

Los Angeles Unified School District

Roosevelt High School Comprehensive Modernization Project SCH # 2017101037

Volume I Final Environmental Impact Report



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April 2018

**Roosevelt High School Comprehensive
Modernization Project**

**Final Environmental Impact Report
SCH # 2017101037**

Volume 1

Prepared for:

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April 2018

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9.0 INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for the Roosevelt High School Comprehensive Modernization Project. This document together with the Draft EIR and its technical appendices comprise the Final EIR. The document has been prepared by Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS) in accordance with the California Environmental Quality Act (CEQA).

The Final EIR is required under Section 15132 of the *State CEQA Guidelines* to include the Draft EIR, comments and recommendations received on the Draft EIR, the responses of the lead agency to significant environmental issues raised by those comments in the review and consultation process, and any other relevant information added by the lead agency (including minor changes to the Draft EIR). A Mitigation Monitoring and Reporting Program is also required; it can be a separate document, or, as in this case, included in the Final EIR.

The evaluation and response to comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; (5) the ability to discover public concerns.

This document provides revisions to the Draft EIR made in response to comments, staff review, and/or changes to the proposed Project. These revisions also correct, clarify, and amplify the text of the Draft EIR, as appropriate, and do not alter the conclusions of the Draft EIR.

PROCESS

In accordance with Section 15050 of the *State CEQA Guidelines* LAUSD is the lead agency that prepared both the Draft and Final EIR for the Roosevelt High School Comprehensive Modernization Project. LAUSD prepared and circulated the Draft EIR beginning on February 6, 2018 and ending on March 23, 2018. In response to several requests for an extended public review period, LAUSD continued to accept comments through April 6, 2018, for a total comment period of nearly 60 days. While Section 15087 of the *State CEQA Guidelines* only requires giving notice by at least one of the following procedures, the District elects to use all three in an effort to notify as wide an audience as possible. A Notice of Availability of the Draft EIR was transmitted to responsible and trustee agencies, regulatory agencies and other interested

parties and stakeholders, as well as published in the Los Angeles Daily News and La Opinión and posted at the Project site, to request comments on the Draft EIR, pursuant to *State CEQA Guidelines* Section 15086.

The Draft EIR was available for review at the LAUSD OEHS, 333 South Beaudry Avenue; the LAUSD Local District Office East, 2151 N. Soto Street; the Roosevelt High School Main Office, 456 S. Mathews Street; and the Benjamin Franklin branch of the Los Angeles public library, 2200 E 1st Street. An electronic copy of the Draft EIR was also posted on the LAUSD OEHS website (<http://achieve.lausd.net/CEQA>). A public hearing on the Draft EIR was held on Wednesday, February 21, 2018 at 6:00 p.m. in the Cafeteria at Roosevelt High School, 456 S. Mathews Street, Los Angeles, California 90033.

Comments on the Draft EIR were received during the comment period, and those comments are responded to in this Final EIR. The Final EIR, together with the proposed Project, will be presented to the Board of Education for review, and the Board will consider certification of the Final EIR and approval of the Proposed Project

CONTENT OF THE FINAL EIR

As discussed above, the primary intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft EIR. Pursuant to Section 15088 of the *State CEQA Guidelines*, LAUSD has reviewed and addressed all comments received on the Draft EIR, including all comments received after the comment period deadline. Included within the Final EIR are the written comments that were submitted during the public comment period as well as oral comments (relevant to the EIR) received at the public hearing.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR includes the following chapters and appendices:

Section 9.0: Introduction. This chapter provides a brief introduction to the Final EIR and its contents.

Section 10.0: Corrections and Additions. This chapter provides a list of corrections and additions to the Draft EIR. None of the changes significantly impact the conclusions presented in the Draft EIR.

Section 11.0 Responses to Comments: This chapter provides a list of commenting agencies, organizations, and individuals. Responses to all comments on the Draft EIR are also included in this chapter.

Section 12.0 Mitigation Monitoring and Reporting Program: This chapter includes the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the *State CEQA Guidelines*.

The Final EIR also includes the previously circulated Draft EIR.

REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency 10 days prior to certification of the Final EIR. The Final EIR is available for public review on the LAUSD Office of Environmental Health & Safety website (<http://achieve.lausd.net/CEQA>).

10.0 RESPONSES TO COMMENTS

The Draft Environmental Impact Report (Draft EIR) for the Roosevelt High School Comprehensive Modernization Project (proposed Project) was circulated for public review for 60 days, beginning on February 6, 2018. The public review period, which ended on April 6, 2018, afforded public agencies, organizations, and the public in general the opportunity to review the Draft EIR and submit written comments regarding the Draft EIR and the proposed project in accordance with Section 15073 of the *California Environmental Quality Act (CEQA) Guidelines*.

A total of six public officials, three organizations, and 58 individuals provided comments and/or letters during the circulation period for the Draft EIR. Fifty-three individuals provided oral comments at a public hearing held on February 21, 2018. This section includes copies of the letters and/or comments received, with the responses to the comments raised immediately following each letter.

In addition, the organization InnerCity Struggle presented 176 form letters with individual comments in favor of the proposed project; and a petition circulated by the organization in favor of the proposed Project garnered 753 signatures. A form comment card with check boxes indicating opposition to the proposed Project and in favor of Alternative 2 distributed by the Coalition to Preserve Los Angeles (C2P-LA) was returned by 66 individuals. A form letter indicating opposition to the proposed Project and in favor of Alternative 2 distributed by the Committee to Defend Roosevelt High School was returned by 127 individuals. A petition hand-circulated by the Committee to Defend Roosevelt High School in opposition to the proposed Project garnered 208 signatures. An on-line petition circulated through the ‘Change.org’ website by the Committee to Defend Roosevelt High School in opposition to the proposed Project garnered 208 electronic signatures. Twenty-two comment cards were completed by Stevenson Middle School students following a presentation of the proposed Project. Copies of these documents are included as Appendices 10.0-1 through 10.0-6, respectively, to this Final EIR.

Comment Number	Commenter	Name	Date
A	Public Agencies/Officials		
A1	California Department of Transportation	Frances Lee	March 22, 2018
A2	Native American Heritage Commission	Gayle Totten, Ph.D.	February 20, 2018
A3	South Coast Air Quality Management District	Lijin Sun, J.D,	March 20, 2018
A4	State Senator – 24 th District	Kevin de León	February 20, 2018
A5	County Supervisor – 1 st District	Hilda Solis	February 20, 2018
A6	Assemblymember – 51 st District	Wendy Carillo	April 6, 2018
A7	Assemblymember – 53 rd District	Miguel Santiago	March 23, 2018

Comment Number	Commenter	Name	Date
A8	Councilmember – 1st District	Gilbert A. Cedillo	March 22, 2018
A9	Councilmember – 1st District	Gilbert A. Cedillo	April 6, 2018
A10	Councilmember – 14 th District	Jose Huizar	March 23, 2018
B	Organizations		
B1	Alma Family Services	Jean G. Champommier, Ph.D.	February 21, 2018
B2	Boyle Heights Chamber of Commerce	Jennifer Lahoda	February 21, 2018
B3	Boyle Heights Neighborhood Council	Unsigned	March 28, 2018
B4	Coalition to Preserve LA	Unsigned	February 21, 2018
B5	Coalition to Preserve LA	Jill Stewart	March 23, 2018
B6	Coalition to Preserve LA	Jorge Castaneda	April 6, 2018
B7	Committee to Defend Roosevelt	Multiple	April 6, 2018
B8	East Los Angeles College	Miguel Dueñas	February 20, 2018
B9	East Los Angeles Community Corporation	Ernesto Espinoza	February 16, 2018
B10	InnerCity Struggle	Maria Brenes	February 21, 2018
B11	Jovenes	Andrea Marchetti	February 22, 2018
B12	KIPP:LA	Marcia Aaron	March 20, 2018
B13	Hollenbeck Middle School	Randy Romero	March 20, 2018
B14	Homeboy Industries	Fr. Gregory Boyle, S.J.	March 20, 2018
B15	Latino Equality Alliance	Eddie Martinez	February 21, 2018
B16	Latinos in Heritage Conservation	Laura Dominguez	March 20, 2018
B17	LA Voice	Zachary Hoover	February 28, 2018
B18	Legacy LA	Maria Lou Calanche	February 19, 2018
B19	Los Angeles Conservancy	Adrian Scott Fine	April 6, 2018
B20	Partnership for Los Angeles Schools	Joan Sullivan	March 21, 2018
B21	Promesa Boyle Heights	Kathi Cervantes	February 27, 2018
B22	Proyecto Pastoral	K. Cato	February 27, 2018
B23	Public Health Advocates	Harold Goldstein, Dr.P.H.	February 20, 2018
B24	Roosevelt High School	Ben Gertner	March 20, 2018
B25	Self Help Graphics & Art	Joel Garcia	February 12, 2018
B26	Stevenson Middle School	Leo I. Gonzalez	March 20, 2018
B27	Sunrise Elementary School	Luis Barraza	February 20, 2018
B28	United Way of Greater Los Angeles	Deena Margolis	February 27, 2018

Comment Number	Commenter	Date
C	Individuals	
C1	America Aceues	February 21, 2018
C2	Leticia Aguiar	February 21, 2018
C3	Ana E. Alvarenga	February 21, 2018
C4	Viviann Anguiano	February 21, 2018
C5	Xavier Aramula	March 22, 2018
C6	Roque Armenta	February 21, 2018
C7	Maria Brenes	February 21, 2018
C8	Belinda Campos	February 21, 2018
C9	Lucia Carranza	February 21, 2018
C10	Carolina Couto	February 21, 2018
C11	Danilo Cuxil	February 21, 2018
C12	Vivian Escalante	March 23, 2018
C13	Jose A. Espinoza	March 1, 2018
C14	Alison Ferreyra	February 21, 2018
C15	Carlos Figueroa	February 21, 2018
C16	Rosa Figueroa	February 21, 2018
C17	J. Miguel Flores	March 22, 2018
C18	J. Miguel Flores	March 23, 2018
C19	Jenesis Fonseca-Ledezma	March 23, 2018
C20	Arely Garcia	February 23, 2018
C21	Gloria Angelica Gasca	February 15, 2018
C22	Blanca Gonzalez	February 21, 2018
C23	Chantal Gonzalez	February 21, 2018
C24	Joaquin Gonzalez	February 21, 2018
C25	Martin Gonzalez	February 21, 2018
C26	Guadalupe	February 21, 2018
C27	Monica Guerrero	March 1, 2018
C28	Felipe Gutierrez	February 21, 2018
C29	Maria D. Gutierrez	February 21, 2018
C30	Daniela Hernandez	February 21, 2018
C31	Toby Horn	February 15, 2018
C32	Juan Ixtan	February 21, 2018
C33	Nidia L. Jimenez	February 21, 2018
C34	Rosalie Lazarus	February 15, 2018
C35	Sara Magallon	March 22, 2018
C36	Jonathan Manzanares	March 29, 2018
C37	Kevin and Diana Meagher	February 21, 2018

10.0 Responses to Comments

Comment Number	Commenter	Date
C38	Keiko Miya	March 23, 2018
C39	Noelia Morán	February 21, 2018
C40	Valerie Najera	April 4, 2018
C41	Carol Ng	March 15, 2018
C42	Cynthia Olmos	February 21, 2018
C43	Rosa C. Peña	February 21, 2018
C44	Dora Perez	March 23, 2018
C45	Laura Romo	March 22, 2018
C46	Laura Romo	April 6, 2018
C47	Maria Ruiz	February 21, 2018
C48	Maribel Sarabia	February 21, 2018
C49	Cecilia Sutherland	February 21, 2018
C50	Laura Torres	February 20, 2018
C51	Peter Tuite	March 11, 2018
C52	Kasey Ventura	February 21, 2018
C53	Vickie Vértiz	February 21, 2018
C54	Gabriel Vidal	February 21, 2018
C55	Rosa M. Zambrano [neé Gomez]	March 1, 2018
C56	Maria Zavaleta	February 21, 2018
C57	Norberto Zuala	February 21, 2018
C58	Judy Branfman	March 19, 2018
D	Oral Comments	Date
D1	Richard Alatorre	February 21, 2018
D2	Gypsy	February 21, 2018
D3	Luanda Diaz	February 21, 2018
D4	Ocho Ramirez	February 21, 2018
D5	Miguel Guerrero	February 21, 2018
D6	Maria Louise	February 21, 2018
D7	Ariana Fernandez	February 21, 2018
D8	Exatiana	February 21, 2018
D9	Dr. John Fernandez	February 21, 2018
D10	Magdalena Ceja	February 21, 2018
D11	Wilfredo Lopez	February 21, 2018
D12	Carlos Castillo	February 21, 2018
D13	Allison Pereira	February 21, 2018
D14	Yolanda Gonzalez	February 21, 2018
D15	Marlene	February 21, 2018
D16	Jorge Lopez	February 21, 2018

10.0 Responses to Comments

D	Oral Comments	Date
D17	Gavin Glosio	February 21, 2018
D18	Cindy	February 21, 2018
D19	Omar Lopez	February 21, 2018
D20	Man 1	February 21, 2018
D21	Maria Zabaleta	February 21, 2018
D22	Joseph Cruz	February 21, 2018
D23	Cecilia Silvia	February 21, 2018
D24	Alvin	February 21, 2018
D25	Joaquin Gonzalez	February 21, 2018
D26	Enrique Rendon	February 21, 2018
D27	Ariana Romero	February 21, 2018
D28	Anthony	February 21, 2018
D29	Maria	February 21, 2018
D30	Antonio	February 21, 2018
D31	Diana	February 21, 2018
D32	Laura Banuelos	February 21, 2018
D33	Woman 1	February 21, 2018
D34	Cynthia	February 21, 2018
D35	Loyola Felix	February 21, 2018
D36	Axel	February 21, 2018
D37	Belinda Campos	February 21, 2018
D38	Veronica Gutierrez	February 21, 2018
D39	Woman 2	February 21, 2018
D40	Jorge Castaneda	February 21, 2018
D41	Clara Velez	February 21, 2018
D42	Zuma Melendez	February 21, 2018
D43	Francisca Alma	February 21, 2018
D44	Maria Leon	February 21, 2018
D45	Nicolette Morales	February 21, 2018
D46	Maria Prevez	February 21, 2018
D47	Roslyn Sibarra	February 21, 2018
D48	Antonio Avillar	February 21, 2018
D49	Viviana Escalante	February 21, 2018
D50	Candy Tanamache	February 21, 2018
D51	Kenneth Byard	February 21, 2018
D52	Gene Kenotene	February 21, 2018
D53	Francisco Ceja	February 21, 2018

PUBLIC COMMENT AND RESPONSES

The following pages provide the written comment letters and the Districts' responses to these comments. Many of the comments submitted on the Draft EIR repeatedly focused on a particular set of issues. Accordingly, "Topical Responses" have been prepared for such issues. Each Topical Response provides a complete discussion of the general concern raised, and incorporates in one location the information requested from the various permutations of the comment received from the different commenters. Consequently, a particular topical response may provide more information than requested by any individual comment. The Responses to Comments section of the Final EIR refers the reader to the Topical Responses section for repeatedly raised comments.

Topical Responses in this EIR address the following concerns:

- **Topical Response 1:** Responses to Comments Supporting Alternative 2
- **Topical Response 2:** Precommitment to the Proposed Project
- **Topical Response 3:** Community Outreach Regarding the Proposed Project

TOPICAL RESPONSES

Topical Response 1 – Responses to Comments Supporting Alternative 2

This response addresses comments to the Draft EIR in support of Alternative 2 – Rehabilitation of Building 1, which question the Draft EIR’s analysis that Alternative 2 would not meet many of the objectives of the Project and the Los Angeles Unified School District’s (LAUSD’s) broader policy objectives that are listed in Section 2.0.7 of the Draft EIR.

As defined in **Section 3.2, Cultural Resources**, the Roosevelt High School (Roosevelt HS) campus is identified as an eligible historic district based on criteria A/1 due to its association with the 1968 Walkouts (also known as the Blowouts) and B/2 due to its association with the lives of significant persons in the LAUSD civil rights movement. All buildings present on the campus in March 1968 at the time of the Walkouts are considered contributors to the proposed Roosevelt High School Historic District. The contributors and the priority of significance of each are listed in **Table 10.0-1 Roosevelt High School Historic District Contributors**. In addition, Building 1 (also known as the R Building) has been identified as being individually eligible as a historical resource under criteria A/1 and B/2. Therefore, the loss of contributors and Building 1 would be a significant and unavoidable impact to historic resources.

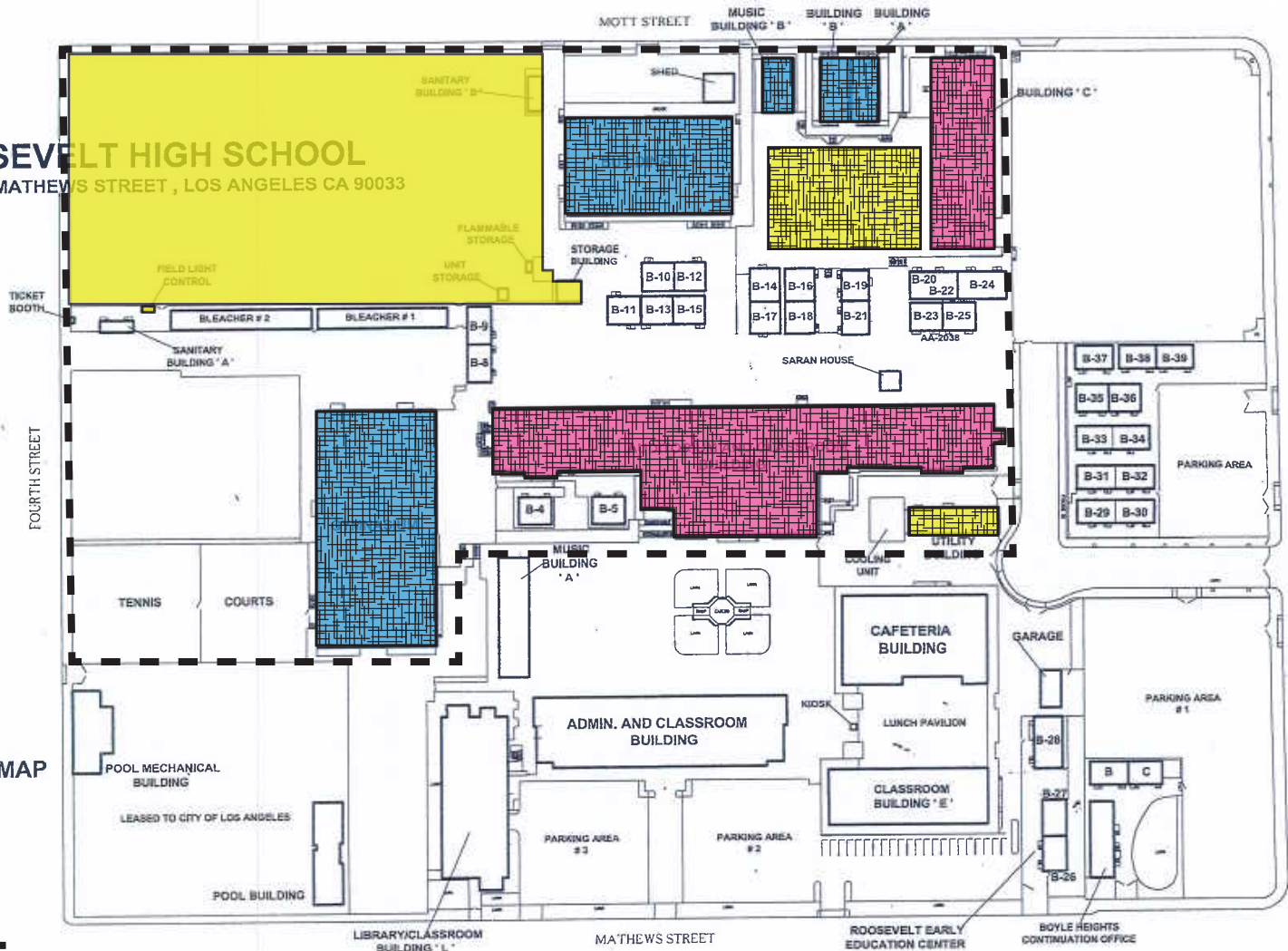
The buildings proposed for demolition under the proposed Project are shown in **Figure 10.0-1 Historic District Contributors and Buildings to be Demolished – Proposed Project**.

**Table 10.0-1
Roosevelt High School Historic District Contributors**

Bldg. No	Building Name	Year Built	Priority
1	Auditorium and Classroom	1922	Primary
7	Classroom Building	1937	Primary
6	Industrial Arts	1968	Secondary
8	Instrumental Music Building	1959	Secondary
17	Classroom	1964	Secondary
18	Classroom	1964	Secondary
19	Physical Education Building	1968	Secondary
10	Flammable Storage Building	1953	Tertiary
11	Field Sanitary Building	1958	Tertiary
12	Equipment Field Storage	1941	Tertiary
16	Field Light Controls	1949	Tertiary
20	Utility Building	1968	Tertiary
n/a	Track		Tertiary
n/a	Portions of Landscaping		Tertiary

Source: ASM Affiliates, CRTR January 2018

ROOSEVELT HIGH SCHOOL
456 SOUTH MATHEWS STREET, LOS ANGELES CA 90033



Contributor

- Primary
- Secondary
- Tertiary

- Historic District
- To be Demolished

SOURCE: LAUSD, 2017

FIGURE **10.0-1**

Historic District Contributors and Buildings to be Demolished – Proposed Project



Background

The proposed Project has been developed under the LAUSD's School Upgrade Program (SUP), established to improve student health, safety, and educational quality by modernizing, upgrading, building, and repairing school facilities. The SUP goals and principals approved by the LAUSD Board of Education (BOE) are the following:

- Schools Should be Physically Safe and Secure
- School Building Systems Should be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision¹

Furthermore, six core principles have been established for developing 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.
- The exterior conditions of the school site should be addressed to improve the visual appearance including landscape, hardscape, and painting.
- The interior physical conditions of classroom buildings that would otherwise not be addressed should be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatments/blinds and whiteboards.

¹ LAUSD Board of Education Report. January 14, 2014. Report Number 143 – 13/14. Subject: School Upgrade Program.

Capital Needs Assessment: Master Planning and Facilities Condition Assessment

The capital needs assessment and master planning process for the School Upgrade Program began in 2010, with surveys and visual assessments of the nearly 600 legacy K-12 campuses (schools constructed prior to the initiation of the District's current Bond Program in 1997) within the District. The effort involved building industry professionals, including architects, structural engineers, mechanical engineers, electrical engineers, and civil engineers, however seismic and historic evaluations, site surveys and infrastructure analysis, including topographic, geological and utility surveys, were not undertaken at this time. Each survey considered existing school-based facilities and demographics data in conjunction with data collected during individual site visits. The information gathered was reviewed to verify school configurations, assess physical conditions, document current uses, and identify physical and instructional needs. Draft survey reports were created and reviewed with key school site, local/regional area, and central staff.

Once school surveys were completed, conceptual plans that propose possible solutions to address major deficiencies, instructional needs, and enrollment projections were prepared. Conceptual planning considers removing and/or replacing obsolete and significantly deteriorated structures, modernizing existing facilities, and increasing open space. Input from key stakeholders in the school community is also considered in the development of each plan. The facilities master plans serve as a roadmap for the development and execution of future capital projects that will modernize, build, and repair school facilities to improve student health, safety, and educational quality.

In August 2012, a Facilities Condition Assessment (FCA) of the District's legacy school campuses was initiated. The assessments are performed by teams of skilled-trades personnel within Maintenance & Operations whose expertise is used to determine the remaining service life of approximately 800 different types of building and site components. The information is used in conjunction with master planning surveys for project planning. FCA data is also used to support the development of projects throughout the Facilities Services Division so as to minimize costs and increase efficiency.

Methodology for Prioritizing Schools Sites for Comprehensive and Identification of Sites

The funding identified for the comprehensive approach (comprehensive modernization projects) to improving the District's aging and deteriorating school facilities while significant, is insufficient to address all of the known physical needs of our school facilities. As such, a prioritization methodology was developed to identify the K-12 District-operated legacy school sites that have the most critical physical conditions and prioritize them for improvements so the schools are safe, healthy, and functional

places to learn. This is an important step towards providing equity between our newer schools and our legacy schools so that every student has an equal opportunity for success.

The approach was deliberative, data-driven, and inclusive. The prioritization methodology reflects the District's vision, priorities, and facility needs, and the goals of the School Upgrade Program. A committee of District leaders provided strategic guidance and direction, and a committee consisting of external experts with capital planning, prioritization, education, and/or facilities issues also provided feedback, suggestions, and validation of the process and methodology.

Based on the outcome of the process, the most reliable and measureable facilities-based datasets that best express a school's physical condition were identified to assess each school's need for a comprehensive modernization project. An emphasis was placed on those conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate. This methodology was vetted through extensive analysis and discussions with internal and external stakeholders and technical experts.

As stated on page 2.0-10 of the Draft EIR, in March 2015, the Board of Education approved the 11 school sites that were identified for the development of comprehensive modernization projects. The sites were identified as having a multitude of critical physical conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate, based on an assessment of the following conditions:

- The physical condition of a school's buildings and grounds/outdoor areas identified by the 10-year Facilities Condition Index (FCI), a comparative indicator of the relative condition of a school's facilities in relation to the current replacement value. Where applicable, the FCI score is adjusted to reflect projects underway and the improved conditions that will be provided.
- The seismic risk factor identified using the Federal Emergency Management Agency's (FEMA) Hazus-MH model for determining the probability of failure based on the predicted earthquake magnitude generated by specific faults, year of construction, type of construction, number of stories, and code and construction quality at the time of construction.
- Size of food service facility, multi-purpose room/auditorium, and library determined by an assessment of the difference between the size of the core facility and the design standard for a new facility.
- Size of play space determined by an assessment of the difference between the size of a school's play area and the size recommended under the Rodriguez Consent Decree.

- Percentage of classrooms in portable buildings calculated based on the number of classrooms in portable buildings versus the number of classrooms in permanent buildings.
- Adequacy of controlled public access point based on an assessment of whether a campus has a secured single point of entry, an intercom/camera system that controls visitor access to the school site, or neither.
- Site density determined by an analysis of the amount of square footage per student at a school site.

The 11 school sites identified for a comprehensive modernization project were: Cleveland, Grant, Huntington Park, Jefferson, North Hollywood, Polytechnic, Roosevelt, San Pedro, and Venice High Schools, Sherman Oaks Center for Enriched Studies (SOCES), and Burroughs Middle School (Board Report No. 373-14/15). The Board of Education's approval authorized staff to commence pre-design/due diligence activities in order to develop well-defined Project Definition proposals including a budget, scope, and schedule.

Project Development

With the Board's March 2015 authorization, the District proceeded with a Preliminary Site Analysis/Program Development Phase during which the following studies and analysis were performed for each campus:

- Seismic Evaluations of AB 300 buildings (Tier 1/Tier 2)
- Geotechnical Analysis
- Topographic and Utility Surveys
- Cost Analysis
- Historic Evaluations
- Educational and Operational Analysis
- Demographic Analysis
- Accessibility Evaluation
- Facilities Condition Assessment
- Environmental Studies
- Other studies and analysis as required

Moreover, school-site administrators and staff, Local District representatives, and District leadership were engaged in the preliminary assessment stage, especially as it relates to the ongoing educational programming efforts.

Project development focused on addressing the most critical issues — failing buildings and / or building systems and buildings deemed through a detailed seismic evaluation to require seismic life-safety upgrades. As part of this effort, extensive seismic evaluations were performed by structural engineers. Buildings with characteristics identified by the State of California Assembly Bill 300 (AB 300), the Seismic Safety Inventory of California Public Schools, Department of General Services Building List, were evaluated to determine where seismic upgrades were needed, and the extent of work required to ensure life safety.²

Additional assessments of the 11 school facilities, educational programming, and infrastructure were performed by industry professionals, along with extensive seismic and historic evaluations. These evaluations were then reviewed by District staff, as well as peer reviewed by other outside building professionals with extensive experience in seismic design involving historic structures. The findings of these evaluations, coupled with input from community members, school users and stakeholders, formed the basis for the comprehensive modernization project at Roosevelt HS, and to meet the six core principles of comprehensive modernization projects. To address the significant seismic deficiencies, to provide an equitable, 21st century learning environment, and to maximize cost efficiencies, the proposed Project includes the demolition and rebuilding of certain campus buildings as outlined in the **Section 2.0, Project Description** of the Draft EIR.³

On December 8, 2015, the BOE approved the project definition for the proposed Roosevelt High School Comprehensive Modernization Project. The proposed Project is defined to address the most critical physical concerns of the building and grounds while upgrading, renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.

² *The AB 300 list identifies those school buildings that do not meet the minimum requirements of the 1976 California Uniform Building Code (UBC). AB 300 identified 269 of the LAUSD's nearly 13,000 buildings for seismic evaluation. In 2006, upon further analysis by LAUSD staff, including site visits and field investigations, a total of 667 buildings were identified for seismic evaluation based upon AB 300 criteria and LAUSD's higher standards. Since that time, seismic evaluations have been performed on school buildings identified to be the most seismically vulnerable, and projects have been developed to address the buildings determined to be in the greatest need of structural upgrades.*

³ LAUSD 2015a.

Comprehensive Modernization project definitions, which consists of a proposed project's budget, scope and schedule, are based on the core principles to project scoping. Utilizing the core principles to project scoping helps ensure a consistent, transparent, and equitable approach in the planning, design and construction of all proposed comprehensive modernization projects.

Findings of the Analysis Phase

Building 1, originally comprised of four-stories, is the oldest building on the Roosevelt HS campus. The original 1922 building required seismic strengthening projects in 1936 and 1954 and a fire resulted in the removal of the original fourth floor. In addition to classrooms and related support spaces, the building also includes an auditorium with balcony seating and a large double-height lobby. Building 1, which contains the auditorium and classrooms, does not meet current District standards for performing arts spaces and classroom size and state and federal requirements governing classroom size and accessibility. Of the 48 classrooms in the building, thirty-three (33) or more than two-thirds of the building's classrooms, are less than 800 square feet (sf), which is the smallest classroom size that may be used as a general classroom per LAUSD specifications.⁴ While an 800 sf classroom meets the minimum size requirements, it is far from the California Department of Education's (CDE) standard classroom size of 960 sf. Moreover, almost every exterior door, including at official building entrances, requires the use of stairs, thereby limiting access to students, faculty, parents, and the community with disabilities. The existing stairs do not meet American with Disabilities (ADA) accessibility requirements. An elevator was retrofitted at the south end of the building, which can add significantly to the distance the community with disabilities must travel to access certain areas of the building.

Major structural modifications would be required in order to bring Building 1 up to current Division of State Architect (DSA) seismic standards, including extensive foundation work to resist the overturning of the three-story building in a significant seismic event. A new foundation system would be required, including additional spread footings and more than 100 new structural 'micro-piles'; further, extensive areas of the existing ground floor slab would require demolition in order to install the new foundation system. In total, the retrofit would require the removal and replacement of 65 percent of the floor and roof areas.

As noted below, these and other major renovations required to meet seismic standards would not enable Alternative 2 to attain the proposed Project's objective of providing educational facilities that meet CDE educational specifications and that are equivalent to other new LAUSD buildings.

⁴ LAUSD's recommended general classroom size is 960 sf.

All existing exterior perimeter walls would need to have metal dowels drilled into the surface every two-foot (2') on center to bind the existing brick onto the concrete substrate. Numerous shear walls would also be required on the exterior of the building, at critical places perpendicular to the exterior and a few along the interior corridors. The building dimensions and required locations of the shear walls would make all classroom spaces elongated. This elongated configuration would decrease classroom flexibility, and increase viewing and listening distances, which in turn degrades the learning environment for the students. Further, the areas of the building that would be large enough for standard classrooms would be reduced, resulting in fewer standard classrooms. This would make the building very inefficient, forcing the District to devote a higher percentage of its limited financial resources to building areas that are ultimately not instructionally useful. A memo and drawings showing the locations of some of the required structural improvements is provided in **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**, to this Final EIR.

When making the decision to pursue demolition and new construction rather than a seismic retrofit and rehabilitation in compliance with the SOI standards, many factors were considered. These include current standards for a 21st century learning environment, cost, schedule, and the technical details and feasibility associated with renovating Building 1. In comparison to other school modernization and retrofit projects, the seismic work required for Building 1 is more extensive due primarily to construction type and number of stories, in addition to the constraints of the building geometry and floor heights that prevents meeting educational specifications. These considerations are described in detail below and in the responses to other specific questions that deal with Alternative 2 and the preservation of Building 1 also documented in this section.

Development of Alternative 2 – Rehabilitation of Building 1

LAUSD considered and explored a reasonable range of potentially feasible project alternatives that could lessen the significant environmental impacts of the proposed Project, including such impacts on Building 1 and other historic resources, but still feasibly attain most of the proposed Project's objectives as required by CEQA. See CEQA Guidelines Section 15126.6.

Under Alternative 2, Building 1 would be rehabilitated. The rehabilitation would consist of seismic, accessibility and life/fire safety upgrades to meet current Federal, State and Local requirements and standards for school buildings. The purpose of this alternative is to consider the rehabilitation of Building 1 in a manner that the Project would conform with the *Secretary of the Interior Standards for the Treatment of Historic Properties* (SOI Standards) and mitigate the significant and unavoidable impact to Building 1.

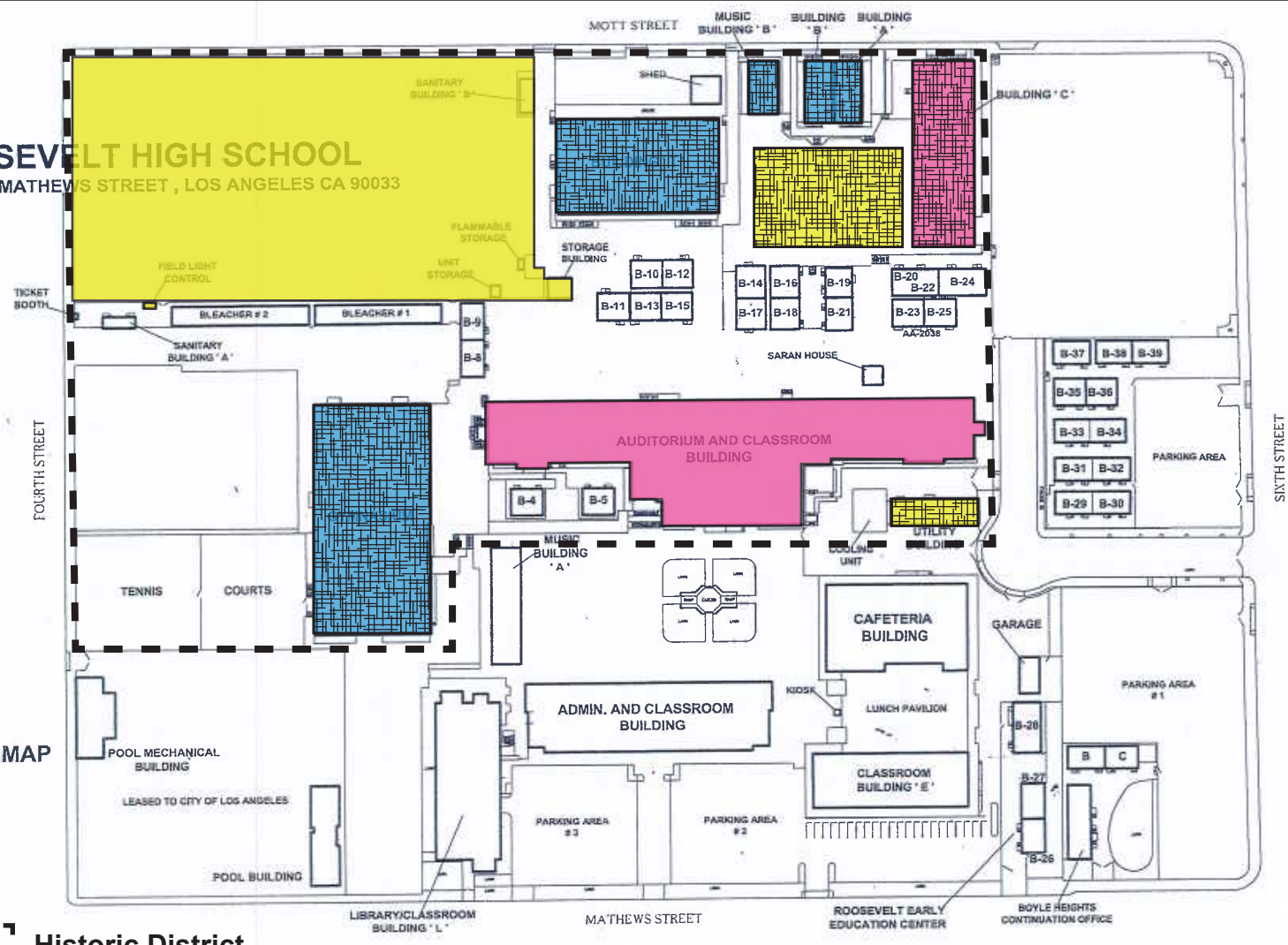
Figure 10.0-2 Historic District Contributors and Buildings to be Demolished – Alternative 2 illustrates which buildings would be demolished and retained under this alternative. LAUSD staff has generated alternate site plans that illustrate what the project could look like under this Alternative (see **Appendix 10.0-8 and Appendix 10.0-9, Alternative 2 – Site Planning Options**). While not included in the Draft EIR, but included in this Final EIR, these site plans were shared to the public during the numerous community meetings held during the Draft EIR comment period (see **Appendix 10.0-10, Presentation to the Boyle Heights Neighborhood Council – Planning and Land Use Committee**). As described in the Draft EIR, if the District were to select Alternative 2, it would have very significant impacts in terms of cost, schedule, and building layout and functionality. These are further described below.

Figure 10.0-2 Historic District Contributors and Buildings to be Demolished – Alternative 2 illustrates this alternative. As described in the Draft EIR and detailed below, Alternative 2 would not be feasible or desirable because it would not attain many of the proposed Project's objectives and would prevent the District from providing a modernized, upgraded high school that would provide a seismically safe facility that would meet educational requirements.

As described in the Draft EIR, Alternative 2 would yield 16 classrooms that would be usable for instruction. This low classroom count is caused by the combined effects of an inefficient existing building geometry coupled with the required structural intervention. The ground floor is additionally compromised by a floor to floor height of 10'-6". With a structural depth of 18" and required installation of HVAC systems and lighting, the final ceiling would be installed about 7'6" above the floor. This low ceiling would preclude classrooms from being on this floor level. As a result, approximately 45,200 square feet (sf) of additional classroom space, due to the limited ceiling height at the first floor, would need to be constructed elsewhere on an already constrained campus. As a result of the additional necessary classroom space and the tight campus layout, parking would need to be either located on the expansion area for the playfields or, to accommodate the playfields, a 19,700 sf parking structure would need to be constructed with an elevated playdeck on top. Both the classroom building and the parking/playdeck combination would add substantially to the overall construction cost of the Project and the maintenance and operation cost upon completion.

ROOSEVELT HIGH SCHOOL

456 SOUTH MATHEWS STREET, LOS ANGELES CA 90033



- Contributor**
- Primary
 - Secondary
 - Tertiary

- Historic District
- To be Demolished

SOURCE: LAUSD, 2017

FIGURE **10.0-2**

Historic District Contributors and Buildings to be Demolished – Alternative 2

Cost

The cost to renovate schools is an important factor for a public agency such as LAUSD to face with regard to its school facilities. Despite the investments made to address overcrowding and repair schools, the District is still making up for decades of facilities neglect. District school facilities are old, deteriorating, being pushed way beyond their useful lives, and do not adequately function as schools of the 21st century. Almost half of the District's buildings were constructed at least 50 years ago, nearly 800 of the buildings were constructed more than 75 years ago, and approximately 15 percent of the "newly" constructed school projects are already ten years old. Available funding is woefully insufficient to address all of the known needs of our school facilities. Therefore, the comprehensive modernization projects are focused on the most critical issues – failing buildings and/or building systems, and buildings deemed through a detailed seismic evaluation to require seismic upgrades. These projects address essential safety issues so that our schools are safe and our students can learn. This approach will allow us to reach more schools with the limited funding available.

Alternative 2 will require constructing an additional 72,700 sf building to house the required permanent classrooms provided in the proposed Project. This includes approximately 61,000 sf of additional general and specialty classroom space and an elevated playdeck. In addition, Alternative 2 will require another phase of construction and an additional 19 temporary classrooms.

Construction on an operating campus is disruptive to the ongoing educational programs on campus. To minimize disruption, LAUSD has committed to completing all modernization projects as quickly as possible. Based on LAUSD's extensive experience in constructing new schools and modernizing existing schools over the last 20 years, a program valued at over \$25 billion, a significant amount of additional time will be required to retrofit and rehabilitate Building 1. Unforeseen conditions throughout construction, materials testing, careful selective demolition, the addition of a construction phase, and constructing an elevated playdeck are estimated to require at least two additional years of construction. The extended construction duration would incur additional cost escalation and construction management costs. In addition, Alternative 2 will require offsite temporary parking for staff and faculty along with shuttle service to and from the school site. As a result, Alternative 2 would increase the overall cost by an estimated \$39.8 million dollars more than current cost of \$173 million for the proposed Project (see **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**).

Layout

Under Alternative 2, Building 1 would remain in the middle of the Project site. Therefore, the preferred and optimal site plan as presented in the proposed Project would require significant reorganization. As

part of this reorganization, parking and the athletic components of the site (i.e., tennis courts, basketball courts) would be located in the future expansion area for the football or baseball fields, precluding the future expansion of the football field to regulation size unless an investment is made in an elevated playdeck. Under Alternative 2, the new gym would be located at 6th Street, resulting in the locker rooms being much further from the various sports fields and courts and will result in delays for students and staff transitioning between periods during school and athletic events outside of school hours. This lack of consolidation also will compromise campus security during non-school hours in order to provide access for community groups. Additionally, Building 1's location in relation to the future baseball field would prevent direct pedestrian access from the gym to the courts and to the track and field. Students would be required to walk through or around Building 1, adding to the inefficiencies.

Furthermore, and of great concern to the District, the reconfiguration also would create a more complicated first responder access plan with emergency roads more disconnected and non-contiguous, thus further compromising fire-life-safety mitigation at the site.

As discussed in more detail below, in order to meet the instructional requirements of the school, another new classroom building would need to be constructed to compensate for the loss of classrooms resulting from the retention of Building 1. Further, to meet the DSA playfield requirement, a play deck would need to be constructed on top of the parking area.

Relationship to the Proposed Project Objectives and LAUSD Goals and Principles

State CEQA Guidelines Section 15126.6 (a) states "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effect of the project. As described in Section 4.0 Alternatives, Alternative 2 would not achieve several of the project objectives and those that would be achieved would be done so at a lesser extent than the proposed Project. In particular, Alternative 2 would result in increased cost, additional time, inferior classroom facilities and reduced safety and accessibility, as described herein.

LAUSD Board of Educations (BOE) approved SUP goals and principles are:

- Schools Should be Physically Safe and Secure
- School Building Systems Should be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

These goals and principles would not be achieved under Alternative 2 for the following reasons:

Schools Should be Physically Safe and Secure

Compared to the proposed Project, Alternative 2 would be less safe and secure for several reasons. First, the layout of the campus under Alternative 2 would not maximize sight lines that increase safety. Second, Alternative 2 would place the auditorium space on the interior of the campus, which is not as secure as having this core facility, utilized by the public and community at large, near the perimeter of the campus. This is a common LAUSD site planning feature that is frequently implemented at other campuses. Third, the fire access lane provided in Alternative 2 is discontinuous, providing less than ideal fire department and first responder access.

School Building Systems Should be Sound and Efficient

An objective of the School Upgrade Program is that school building systems should be sound and efficient. As presented to the Bond Citizens' Oversight Committee at its November 20, 2013 meeting, and the Board of Education's Audit, Budget and Facilities Committee Meeting on January 9, 2014, this objective was established to support projects that would result in school facilities that: 1) provide an adequate building infrastructure to support the learning environment, and that are also 2) efficient to maintain and operate. As compared to the proposed Project, Alternative 2 would result in a building infrastructure that does not support the learning environment for 21st century learners, CDE requirements for school facilities, nor LAUSD design standards for the modernization and construction of school facilities. Moreover, as compared to the proposed Project, Alternative 2 would result in a school site that is less efficient to maintain and operate. Under Alternative 2, the inefficiency of Building 1 and the construction of additional classrooms on site would increase the burden placed on school-site custodial staff, maintenance and operations, and administrators, teachers, and aides with student supervision responsibility. Essentially there would be more spaces to clean, maintain, and supervise thereby making the site less efficient to maintain and operate under Alternative 2 as compared to the proposed Project.

School Facilities Should Align with Instructional Requirements and Vision

Under Alternative 2, Building 1 would not align with the current instructional requirements and vision. Today's standards call for a performing arts center which includes a large performance/auditorium space and classroom spaces specifically designed for performing arts, including music, dance, drama, and choral arts, etc. Under Alternative 2, the existing auditorium would be upgraded, however the upgrades would not result in an auditorium meeting today's standards – the acoustics could not be sufficiently upgraded, the rake of the floor wouldn't change and site lines would not be optimized, and the required specialty support classrooms could not be provided immediately adjacent to the auditorium. Additionally, only 16 classrooms usable for instruction would be located in Building 1. While the size of

the 16 classrooms would allow for instructional use, the layout of the classrooms would be compromised and would not meet the current facilities standards for a 21st century learning environment. All remaining spaces in the building would not align with LAUSD's instructional requirements and vision.

Alternative 2 does not meet several of the basic Project objectives, which are set forth in the Draft EIR in **Section 2.0, Project Description**. Project objectives not met or impeded by Alternative 2 are listed below.

Objective #3: Provide educational facilities that meet California Department of Education (CDE) educational specifications and are equivalent to other LAUSD campuses.

By retaining and renovating Building 1, classroom sizes in the building would not meet current LAUSD standard classroom size and dimensions. The Building's existing structural layout would restrict classroom proportions to an elongated and narrow shape. These restricted proportions do not support effective instruction when compared to classrooms that meet District educational specifications. These elongated classrooms would limit teaching wall visibility and result in reduced acoustical effectiveness due to the increased distance from the instructor to the student and limit flexible seating arrangements. The seismic retrofit work would result in an inefficient utilization of space by only yielding 16 classrooms that meet CDE standards from the existing 48 under-sized classrooms.

The major renovations that would be required to meet seismic safety standards would not enable the attainment of the proposed Project objective of providing educational facilities that meet CDE educational standards and that are equivalent to other District campuses. All existing exterior perimeter walls would need to have metal dowels drilled into the surface every two-feet (2') on center to bind the existing brick onto the concrete substrate. Numerous shear walls would also be required on the exterior of the building, at critical places perpendicular to the exterior and a few along the interior corridors. The building dimensions and required locations of the shear walls would make all classroom spaces elongated. This elongated configuration would decrease classroom flexibility, and increase viewing and listening distances, which in turn degrades the learning environment for the students. Further, the areas of the building that would be large enough for standard classrooms would be reduced, resulting in fewer standard classrooms. This would make the building very inefficient, forcing the District to devote a higher percentage of its limited financial resources to building areas that are ultimately not instructionally useful. A memo and drawings showing the locations of some of the required structural improvements is provided in **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**, to this Final EIR. As a result, Alternative 2 would not attain Objective #3 of the proposed Project.

The remaining spaces and rooms also would not meet the CDE standard for classrooms and would have to be used as smaller support spaces that are not required by the program. In addition, the limited floor to floor height at the first floor of Building 1 does not provide for adequate ceiling heights for this floor to be

utilized for classrooms. There would be more support spaces than the program and Project requires. Sixty-five (65%) percent of Building 1 would be considered unsuitable for the educational program requirement, as well as for administrative purposes due to its location in the interior of the campus. In order to provide a secure, single point of entry to the campus, the administration needs to be located on the perimeter.

Objective #7: Improve the overall functionality and utility of the campus by placing buildings to be compatible with adjacent functions by creating different “zones” that separate academic uses from physical education uses.

By incorporating Building 1 into the site plan, the area designated as “classroom zone” at the interior of the campus would be used primarily by Building 1. As Building 1, when renovated would only accommodate 16 classrooms, the remaining classrooms would need to be accommodated elsewhere on the site and hinder the improvement of the overall functionality of the campus.

The proposed Project provides strategic zoning for the Roosevelt campus. The administration, performing arts, and gymnasium buildings would be on the perimeter of the site, to provide for controlled access and ease of community use. Classrooms would be centrally located around the quad reducing travel time between classes. In addition, the location of the staff parking lot under the proposed Project would be adjacent to the classroom building with minimal travel distance and change in elevation.

In Alternative 2, Building 1 would remain at the middle of the Project site, which doesn’t provide for efficient placement of academic, administrative, athletic, and public spaces. Also, under Alternative 2, access to the other buildings, particularly ADA access, would be impeded by Building 1. As a part of this reorganization, parking and the athletic components of the site (i.e., tennis courts, basketball courts) would be located in the future expansion area for the football or baseball fields, precluding the future expansion of the football field to regulation size.

Parking would need to be either located on the expansion area for the playfields or, to accommodate the playfields, in a parking structure with a playdeck on top comprising approximately 19,700 sf. Both the classroom building and the parking/playdeck combination would add substantially to the overall construction cost of the project and the maintenance and operation upon completion without enabling this Project Alternative to achieve the proposed Project Objective # 7 and other Objectives, as discussed below.

Under Alternative 2, the new gym would be located at 6th Street, resulting in the locker rooms being much further from the various sports fields and courts and will result in delays for students and staff

transitioning between periods during school and athletic events outside of school hours. This lack of consolidation also will compromise campus security during non-school hours in order to provide access for community groups. Additionally, Building 1's location in relation to the future baseball field would prevent direct pedestrian access from the gym to the courts and to the track and field. Students would be required to walk through or around Building 1, adding to the inefficiencies. As a result, Alternative 2 would not attain Objective #7 of the proposed Project.

Objective #8: Incorporate opportunities into the campus site plan for future expansion of the currently undersized football, track, and baseball fields.

As discussed above, due to the need to accommodate additional classrooms on the site to make up for the lack of classrooms within Building 1 and the tight campus layout, parking would need to be accommodated in the future expansion area for the baseball or football fields which could not be built, thereby resulting in students of Roosevelt HS having inferior athletic facilities to other LAUSD campuses.

It may be possible to accommodate the future expansion of the playfields by constructing a parking structure with a playdeck on top; however, both the classroom building and the parking/playdeck combination would add substantially to the overall construction cost of the Project adding approximately \$3.2 million to the Project budget, in addition to the maintenance and operation costs upon completion. In addition, the covered parking lot would be more difficult to keep safe and secure due to line of sight issues. As a result, Alternative 2 would not attain Objective #8 of the proposed Project.

Objective #11 Maximize the use of limited bond funds to provide modern and permanent classroom facilities.

Alternative 2 would not maximize the use of limited bond funds for several reasons, including the following: Alternative 2 will require constructing an additional 72,700 sf building to house the required permanent classrooms provided in the proposed Project. This includes approximately 61,000 sf of additional general and specialty classroom space and an elevated playdeck. In addition, Alternative 2 will require another phase of construction, requiring an additional 19 temporary classrooms.

Construction on an operating campus is disruptive to the ongoing educational programs on campus. To minimize disruption, LAUSD has committed to completing all modernization projects quickly. Based on LAUSD's experience in constructing schools, additional time will be required to retrofit and rehabilitate Building 1. Unforeseen conditions, materials testing, careful selective demolition, and additional construction phase, and constructing an elevated playdeck are estimated to require at least two additional years of construction. The extended construction duration would incur additional cost escalation and construction management costs. In addition, Alternative 2 will require offsite temporary parking for staff and faculty along with shuttle service to and from the school site. As a result, Alternative 2 would

increase the overall cost by an estimated \$39.8 million dollars more than the proposed project (see **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**) and would not attain Objective #11 of the proposed Project.

Objective #12 Replace buildings and infrastructure that have reached the end of their useful lives.

This objective would not be achieved as LAUSD's team of expert consultants has determined the structural systems and geometry of Building 1 no longer serve the primary purpose of the building for classrooms. Additionally the ability to repurpose Building 1 for current and future academic needs is limited. The structural system layout is not conducive to the program requirements. Building 1 does not meet the needs of the current users in a purposeful manner, therefore it has been determined that it has reached the end of its useful life. After renovation of Building 1 to meet SOI standards and to retain the character defining features identified in the Supplemental Historic Resources Evaluation, like the double loaded corridor and stairways, only 35% of the building would be usable to support the instructional program. As a result, Alternative 2 would not attain Objective #12 of the proposed Project.

Objective #14 Improve campus access, safety supervision, and circulation especially for emergency vehicles and personnel.

This objective would not be achieved under Alternative 2 due to the inefficient layout of the campus. As mentioned above, the athletic zone would be bisected and would not improve access or circulation. Under Alternative 2, the new gym would be located at 6th Street, resulting in the locker rooms being much further from the various sports fields and courts and will result in delays for students and staff transitioning between periods during school and athletic events outside of school hours. This lack of consolidation also will compromise campus security during non-school hours in order to provide access for community groups.

The reconfiguration under Alternative 2 would also result in a more complicated first responder access plan with disconnected and non-contiguous emergency access lanes with four separate, segregated points of entry. Whereas the proposed Project would provide a unified, connected, centralized emergency access lane, which would be safer and more efficient. As a result, Alternative 2 would not attain Objective #14 of the proposed Project.

Objective #16 Undertake renovation and construction activities in a timely manner in order to allow school operations to return to normal as quickly as possible.

This objective would not be achieved as the renovation and construction activities would take longer to complete for a renovation compared to new construction due to the need to adhere to SOI standards. Alternative 2 will require constructing an additional 72,700 sf building to house the required permanent

classrooms provided in the proposed Project. This includes approximately 61,000 sf of additional general and specialty classroom space and an elevated playdeck. In addition, Alternative 2 will require another phase of construction, requiring an additional 19 temporary classrooms.

Construction on an operating campus is disruptive to the ongoing educational programs on campus. To minimize disruption, LAUSD has committed to completing all modernization projects quickly. Based on LAUSD's experience in constructing schools, additional time will be required to retrofit and rehabilitate Building 1. Unforeseen conditions, materials testing, careful selective demolition, and additional construction phase, and constructing an elevated playdeck are estimated to require at least two additional years of construction. The extended construction duration would incur additional cost escalation and construction management costs. In addition, Alternative 2 will require offsite temporary parking for staff and faculty along with shuttle service to and from the school site. As a result, Alternative 2 would increase the overall cost by an estimated \$39.8 million dollars more than the proposed Project (see **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**) and would not attain Objective #16 of the proposed Project.

As discussed above, Alternative 2, while being the environmental superior alternative, would not feasibly meet several important proposed Project Objectives by not: a) providing educational facilities equivalent to other LAUSD campuses; b) improving the overall functionality and utility of the campus; c) incorporating opportunities for future expansion of the football, track; and baseball fields; d) maximizing the use of limited bond funds to provide modern and permanent classroom facilities; e) replacing buildings and infrastructure that have reached the end of their useful lives; f) improving campus access, safety supervision, and circulation, especially for emergency vehicles and personnel; and g) undertaking renovation and construction in a timely manner to allow school operations to return to normal as quickly as possible. In addition Alternative 2 would not meet two of the SUP goals 1) Schools Should be Physically Safe and Secure and 2) School Facilities Should Align with Instructional Requirements and Vision. CEQA allows the lead agency to determine that an environmentally superior alternative is infeasible because it is inconsistent with a project's objectives.⁵

⁵ See *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899 (*Rialto*); *CNPS* at pp. 1001-1002; 2 *Kostka & Zischke, Practice Under the Cal. Environmental Quality Act* (Cont.Ed.Bar 2d ed. 2011) § 17.30, pp. 17-30-17-31.) Similarly, in *Los Angeles Conservancy v. City of West Hollywood* (2017) the court found that in general, a lead agency may approve a project that will have a significant effect on the environment if the city finds that "(1) specific economic, legal, social, technological, or other consideration . . . make infeasible the mitigation measures or alternatives identified in the [EIR]; and (2) the significant effects on the environment are outweighed by "specific overriding economic, legal, social, technological, or other benefits of the project." (Pub. Resources Code § 21081, subds. (a)(3) & (b).) An agency's finding of infeasibility is entitled to deference by courts as long as there is substantial evidence in the record to support its decision that fair argument can be made to support the agency's conclusion.

Topical Response 2 – Precommitment to the Proposed Project

This topical response addresses comments over concerns that the LAUSD proceeded in a manner as to preclude consideration of preservation alternatives, prior to the completion of the required CEQA analysis.

The District has not approved the proposed Project and has not otherwise committed to a definite course of action regarding the proposed Project when it entered into the referenced Design-Build Contract (Design-Build Contract) with Swinerton Builders (Swinerton). The District may terminate the Design-Build Contract at any time with or without cause, and has a broad, unconditional right to change the design or features of the proposed Project if the Board of Education (Board) in its discretion decides to approve it. See the Design-Build Contract, a copy of which is attached **Appendix 10.0-11**, Sections 1.1 and 7.1.1. The ability to terminate the Design-Build Contract is an important right the District retains, especially in the event the Board does not certify the EIR or approve the project. This right to terminate as set forth in this Design-Build Contract has actually been used on several occasions by the District to terminate similar design-build contracts that the District entered into under the same statutory authority that authorized the District to enter into the Design-Build Contract here.⁶ No construction, including any demolition, excavation, grading, or construction of improvements, can occur under the Design-Build Contract and its General Conditions unless and until the Board first certifies the EIR for the proposed Project and approves this Project, and issues a notice to proceed with construction. See **Appendix 10.0-11**, Design-Build Contract Section 3.5 and the General Conditions Section 8.1.1.

Taken together, these contract terms mean that before the Board decides whether to certify this EIR and whether to approve the proposed Project, the Board: a) retains complete discretion not to approve the proposed Project by having the unfettered power to terminate the Design-Build Contract at any time before (or after) the Board takes action on the EIR or the proposed Project; b) maintains the ability to modify the proposed Project in any manner it chooses, which will enable the District to design and build that version of the proposed Project that the Board may decide to approve, including the incorporation of any mitigation measures or the adoption of any project alternatives to the proposed Project that the Board may approve; c) can balance the benefits of the proposed Project against any of its significant environmental effects if such effects cannot otherwise be avoided; and d) cannot authorize, and the design-builder cannot undertake, any demolition, excavation, grading or construction of any improvements. These contractual rights and obligations will ensure that no approval of the proposed

⁶ See **Appendix 10.0-12** - Notice of Termination for the Fremont High School Project and **Appendix 10.0-13**, Notice of Termination for the Mandarin and English Dual Language Immersion ES Project.

Project, no commitment to a definite course of action regarding this Project, and no physical alteration of the environment, such as any demolition of Building 1 or any other existing building or other improvement of Roosevelt HS, will occur before the District completes a CEQA review and the Board certifies it.

Rather than indicating a commitment to the proposed Project before the District completes the CEQA process, the Design-Build Contract reflects the District's efforts to achieve the twin goals of planning for and fixing the enormous costs of the proposed Project and of advancing CEQA's objectives of identifying and mitigating or avoiding this Project's potentially significant environmental effects.

The State legislature intended the design-build contracting process provided in the Education Code to enable school districts to engage in long-term planning, project management, and underwriting of major capital projects, such as the Roosevelt High School Comprehensive Modernization project, in a manner that provides financial certainty, expedites project completion, reduces project costs and minimizes cost overruns that could jeopardize the viability of such projects. See Education Code §§ 17250.10 – 17250.50. Entering into a design-build contract, such as the Design-Build Contract here, identifies and locks in all costs associated with the design and construction of such major projects that could last several years from inception to completion. This legislatively enacted tool has become essential in today's real estate and construction climate in which the costs of labor and critical materials such as lumber, copper, and steel have skyrocketed.

CEQA, in turn, affords a lead agency the ability to plan for such major, capital-intensive projects, including preparing preliminary designs, taking other preparatory steps and expending substantial funds, so long as the agency does not commit to a definite course of action or precludes mitigation measures, project alternatives, or a decision not to proceed with the proposed Project. The District believes that in entering into the Design-Build Contract, it has struck the appropriate balance envisioned by CEQA and the statutory design-build process by enabling the District to plan for and fix the proposed Project's considerable costs in case it decides to approve the proposed Project, while retaining the complete ability to adopt any mitigation measures or project alternatives or forego approving this Project altogether as may be warranted by its CEQA review.

To remove any uncertainty over the District's ability to accomplish these CEQA objectives, the District and the design-builder have amended the Design-Build Contract that further clarifies the District's powers to certify the EIR, adopt mitigation measures or any project alternative, balance the benefits of the proposed Project against any unavoidable significant environmental effects or even disapprove the proposed Project before any commitment to a final design or any construction of any improvement or demolition can occur. See **Appendix 10.0-11** Amended Design-Build Contract Section 1.1.

The District remains equally committed to preserving historic and cultural resources as reflected in many of its schools throughout its geographic span whenever it can feasibly do so and still meet the goals of its district-wide modernization program. In advance of implementing this program the District commissioned a comprehensive Historic Context Statement, a 55-campus historic resources survey, and the preparation of procedural guidelines to ensure compliance with CEQA. The District was recognized for this effort, receiving awards from the California Preservation Foundation in 2014 and the Los Angeles Conservancy in 2015 for the Los Angeles Unified School District Historic Context Statement, 1870 to 1969. According to the Los Angeles Conservancy, the Historic Context Statement “created a framework for evaluating Los Angeles’ public schools at a critical time in the district’s history... represent[ing] a sea change for LAUSD in embracing its historic schools and seeking to understand its rich architectural heritage... [It] will help guide the stewardship of some of our most important buildings. Because of the high degree of standardization in school curricula and facilities design—particularly during the postwar period—the document also provides a model for evaluating school facilities throughout California and beyond.”⁷ Drawing on this Statement the District prepared the Design Guidelines and Treatment Approaches for Historic Schools,⁸ which recommend approaches for modernization and upgrade projects that also avoid significant adverse impacts to LAUSD’s historically significant schools. The District continues to use these tools and CEQA to carefully assess any potentially significant impacts to historic and cultural resources, including those that are manifest in the proposed project, and identify and implement feasible measures to mitigate such impacts.

⁷ <https://www.laconservancy.org/lausd-historic-context-statement>

⁸ https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/Final_Design_Guidelines.pdf

Topical Response 3 – Community Outreach Regarding the Proposed Project

This topical response addresses comments over concerns regarding a perceived lack of community outreach performed by LAUSD for the proposed Project.

LAUSD has made every good faith effort to comply with and exceed the public participation requirements of CEQA. The LAUSD Office of Environmental Health and Safety (OEHS) works in partnership with Community Relations Department of the Facility Service Division (FSD) to build greater public understanding and broader participation in the CEQA process. With regard to notification, OEHS has compiled a mailing list of approximately 4,855 listings, which includes residents within a ¼-mile radius of the RHS campus; parents of students at RHS and Hollenbeck Middle School; elected officials and public agencies; community-based and non-profit organizations; and other interested parties and previous meeting attendees. In addition, “backpack” fliers advertising the publication of the Draft EIR and advertising the Draft EIR comment meeting (included in **Appendix 10.0-14**) were sent home with students at RHS (as well as the Math, Science, and Technology Magnet Academy, STEM Academy of Boyle Heights, and Boyle Heights HS), as well as all the elementary schools (ES) and middle schools (MS) that feed into RHS, which include the following:

**Table 10.0-2
Roosevelt High School Modernization Project Flyer Distribution**

School	Total Copies
Belvedere ES	810
Breed ES	480
Dena ES	510
Garza Primary Center	180
Eastman ES	900
Euclid ES	810
Evergreen ES	870
1 st Street ES	690
Lorena ES	540
Malabar ES	750
Rowan ES	960
2 nd Street ES	450
Sheridan Street ES	1050
Soto ES	270
Sunrise ES	480

Belvedere MS	1,110
Hollenbeck MS	1,140
Stevenson MS	1,380
Boyle Heights STEM	240
Roosevelt HS Math/Science/Tech Magnet	570
Roosevelt HS	1,740

Source: LAUSD , Office of Environmental Health and Safety, April 2018

In accordance with Section 15105 of the *State CEQA Guidelines*, LAUSD prepared and circulated the Draft EIR for a period of 45 days public review period from February 6, 2018 to March 23, 2018. As requested by several parties, late comments were accepted through April 6, 2018, for a total comment period of nearly 60 days. In exceedance of the minimum notification requirements of Section 15087 of the *State CEQA Guidelines*, a notice of availability of the Draft EIR was direct mailed to the aforementioned mailing list, as well as published in the *Los Angeles Daily News* and *La Opinion*, and posted at the Project site. Additionally, the FSD Community Relations Department canvassed over 2,500 fliers to all residences within a ½-mile radius of the Roosevelt HS campus for every community meeting held for the proposed Project.

The Draft EIR was available for review at the LAUSD OEHS at 333 South Beaudry Avenue, the LAUSD Local District Office East, 2151 N. Soto Street, the Roosevelt HS Main Office, 456 S. Mathews Street, the Benjamin Franklin branch of the Los Angeles public library, 2200 E 1st Street, and an electronic copy of the Draft EIR was posted on the LAUSD OEHS website (<http://achieve.lausd.net/CEQA>). Although not required by CEQA, a Spanish translation of the Executive Summary of the Draft EIR was made available to the public.

LAUSD has provided a number of opportunities for stakeholder input and public participation. Spanish language interpretation services have been provided at all public meetings hosted by LAUSD. For the comprehensive modernization project such as this one, LAUSD has taken the additional step of forming Project Advisory Groups (PAG). The primary purpose of the PAG is to complement the at-large community meetings by engaging with focused group of stakeholders in a more direct and meaningful manner. PAGs consist of:

1. Interested participants as individual stakeholders. (Not intended to represent any group or category of stakeholders.)

2. Persons who've demonstrated interest in this level of project participation, have some skill, knowledge, or experience that they want to contribute to the project.
3. Persons recommended by the BM's office, Local District office, or the Principal.
4. Persons invited from Neighborhood Councils, alumni groups, student government, parent centers, teachers groups, and community-based and faith-based organizations, among others.

Over the course of the Project, LAUSD has participated in numerous community meeting related to the proposed Project. **Table 10.0-3, List of Meetings regarding the Roosevelt High School Modernization Project**, provides a summary of the various public meetings hosted by LAUSD during the Project planning and CEQA process.

Table 10.0-3
List of Meetings regarding the Roosevelt High School Modernization Project

Date	Meeting Host	Meeting Subject
May 11, 2015	FSD ^a	Community Meeting – Project identification
November 4, 2015	FSD	PAG and RHS School Staff Meetings – Project definition
November 9, 2015	FSD	Community Meeting – Project definition
November 1 & 15, 2016	FSD	RHS School Staff Meeting – Project update
November 16, 2016	FSD	PAG ^d – Project update
November 30, 2016	FSD	Community Meeting - Project update
January 24, 2017	OEHS ^b & FSD	Meeting with the LA Conservancy to discuss historic resources
May 4, 2017	OEHS & FSD	Meeting with the LA Conservancy to discuss historic resources
August 15, 2017	OEHS & FSD	Meeting with the LA Conservancy to discuss historic resources
October 17, 2017	FSD	PAG – design update
October 24, 2017	FSD	RHS School Staff - design update
November 1, 2017	OEHS & FSD	Community - design update and CEQA scoping meeting
January 22, 2018	OEHS & FSD	Meeting with the LA Conservancy to discuss historic resources
February 3, 2018	FSD	Town Hall meeting with the community
February 8, 2018	Boyle Heights Neighborhood Council	Presentation on the Roosevelt High School Modernization Project at the BHNC Planning and Land Use Committee meeting

10.0 Responses to Comments

	(BHNC)	
February 21, 2018	OEHS & FSD	Community - design update and CEQA Draft EIR comment meeting
March 15, 2018	OEHS & FSD	Meeting with the LA Conservancy to discuss historic resources
March 17, 2018	RHS ^c Alumni Association	Presentation on the Roosevelt High School Modernization Project
March 17, 2018	Committee to Defend Roosevelt / Coalition to Preserve LA / LA Conservancy	Meeting to discuss Preservation Alternative
March 28, 2018	BHNC	Presentation on the Roosevelt High School Modernization Project at the BHNC Planning and Land Use Committee meeting

a - FSD - Facility Service Division

b – OEHS - Office of Environmental Health and Safety

c – RHS - Roosevelt High School

d – PAG - Project Advisory Group

Source: LAUSD Office of Environmental Health and Safety, April 2018

DEPARTMENT OF TRANSPORTATION

DISTRICT 7-OFFICE OF REGIONAL PLANNING

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 897-0067

FAX (213) 897-1337

www.dot.ca.gov

Letter A1

*Serious drought.
Making Conservation
A California Way of Life!*

March 22, 2018

Mr. Ed Paek

Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA, 90017

RE: Roosevelt High School
Comprehensive Modernization
Vic: LA-5 / PM: 17.532
GTS# 07-LA-2017-01339
SCH# 2017101037

Dear Mr. Paek:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of a comprehensive modernization of Roosevelt High School campus. The project would include new classrooms, a gym, lunch shelter and auditorium, as well as various upgrades for American with Disabilities Act (ADA) compliance and other infrastructure improvements.

1

Upon reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

Several State, local, and LAUSD specific policies and goals related to sustainable transportation and climate change encourage measures that will promote walking, bicycling, public transit, and carpooling. It is incumbent upon the lead agency to implement design elements (such as pedestrian-oriented design, quality bicycle/skateboard parking, carpool parking) that promote alternatives to driving. Overseeing more than 900 schools, several of which will undergo comprehensive modernizations, each such project is an opportunity to demonstrate LAUSD's commitment to sustainable transportation. If elements such as on-site bicycle parking are omitted from comprehensive modernizations, these improvements may take years to implement, if they are ever implemented at all. Also, although current metrics used to measure impacts may show minimal effects on the transportation system requiring mitigation, LAUSD is welcome to incorporate active transportation improvements voluntarily to reflect the agency's commitment to policies and resolutions cited in Caltrans' Notice of Preparation (NOP) comment letter.

2

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

Mr. Ed Paek
March 22, 2018
Page 2

If you have any questions regarding these comments, please contact project coordinator Severin Martinez, at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# LA-2017-01339.

Sincerely,



FRANCES LEE
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter Number A1: California Department of Transportation – District 7

Office of Regional Planning
100 S. Main Street, MS 16
Los Angeles, CA 90012

Response A1-1

The comment restates the general project description for the proposed Project. It presents no environmental issues within the meaning of CEQA and no specific response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response A1-2

The comment raises issues regarding specific policies and goals related to sustainable transportation and climate change, particularly in relation the inclusion of design elements (such as quality bicycle/skateboard parking, carpool parking) that promote alternatives to driving.

The Project would not encourage driving over other modes. Where feasible, additional bike racks, skateboard towers, and other storage facilities would be installed to provide more opportunities for alternative means of transportation. The exact quantities for these facilities will be finalized as the Project design is refined and finalized.

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Fax (916) 373-5471

Edmund G. Brown Jr., Governor



February 20, 2018

Ed Paek
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Sent via e-mail: CEQA-comments@lausd.net

Re: SCH# 2017101037, Roosevelt High School Comprehensive Modernization Project, City of Los Angeles; Los Angeles County, California

Dear Mr. Paek:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary; Table ES-1, the Introduction and Project Description; the Environmental Impact Analysis, section 3.2 Cultural Resources, and the Other CEQA sections (Effects Found not to be Significant) prepared by ESA for the Los Angeles Unified School District. We have the following concerns:

1. The statement that no letters have been received by the lead agency is in error. Three culturally affiliated tribes have confirmed that they did send letters to LAUSD requesting notification for projects under AB-52.
2. There is no documentation of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes. Discussions under AB-52 may include the type of document prepared; avoidance, minimization of damage to resources; and proposed mitigation. Contact by consultants during the Cultural Resources Assessments is not formal consultation.
3. Mitigation for Tribal Cultural Resources cites SC-CUL-18. This standard condition is not on the list of Standard Conditions listed under Cultural Resources.
4. Standard Condition SC-CUL-13 addresses archaeological resources only. There are no mitigation measures specifically addressing Tribal Cultural Resources separately and distinctly from Archaeological Resources. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources. For sample mitigation measures, please refer to California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>

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ADDITIONAL INFORMATION:

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project 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.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

6

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and**

¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

AB 52 have tribal consultation requirements. Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,



Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects.¹¹
1. The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10.** Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program,** if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report **may not be certified,** nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

⁹ Pub. Resources Code § 21080.3.1, subs. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of “preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county’s jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city’s or county’s jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

7

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project’s APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

- o Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- o Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- o Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- o Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- o Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

Letter Number A2: Native American Heritage Commission

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691

Response A2-1

The comment states that the agency has reviewed the Draft EIR for the proposed project. It presents no environmental issues within the meaning of CEQA and no specific response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response A2-2

Both the Notice of Preparation (October 2017) and the Notice of Availability (February 2018) were sent to six tribes: Gabrieleno Band of Mission Indians - Kizh Nation, Gabrielino /Tongva Nation, San Fernando Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrieleno/Tongva San Gabriel Band of Mission Indians, and the Fernandeno Tataviam Band of Mission Indians. No letters from any of these tribes were received by LAUSD OEHS.

Response A2-3

As part of the AB 52 process, the tribe must respond to LAUSD within 30 days of receiving this notification if they want to engage in consultation on the Project, and LAUSD must begin the consultation process within 30 days of receiving the tribe's request. While no requests for consultation were specifically received for the proposed Project, OEHS staff did participate in a conversation via conference call with the Gabrieleno Band of Mission Indians – Kizh Nation in September 2017 for a different LAUSD project, during which a measure similar to SC-CUL-18 was discussed to ensure protection of unanticipated discoveries associated with Tribal cultural resources.

Response A2-4

The text of LAUSD Standard Condition of Approval SC-CUL-18 was included in **Section XVIII, Tribal Cultural Resources** in the Initial Study, provided as **Appendix 1.0** of the Draft EIR. This SC states that if during grading, excavation, or other ground disturbing activities evidence of Native American resources is uncovered the following procedure shall be implemented:

All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

Response A2-5

As discussed above in Response to Comment A2-4, SC-CUL-18 specifically addresses the treatment of Tribal Cultural Resources, separate and apart from archeological resources.

Response A2-6

This comment outlines existing CEQA regulations and guidance. It presents no environmental issues within the meaning of CEQA and no specific response is required.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

March 20, 2018

CEQA-comments@lausd.net

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Draft Environmental Impact Report for the Proposed Roosevelt High School Comprehensive Modernization Project (SCH No.: 2017101037)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

1

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to modernize the campus for Roosevelt High School by demolishing temporary buildings and replacing them with permanent structures and buildings of approximately 236,000 square feet on 22.7 acres (Proposed Project). Construction is expected to be completed in 48 months¹. Because Roosevelt High School is an active campus, construction of the new buildings and modernization must be phased in a way to maintain the academic functions².

SCAQMD Staff's Comment – Overlapping Construction and Operational Impacts

In the Air Quality Section, the Lead Agency quantified the Proposed Project's regional construction and operational emissions³ and compared them to SCAQMD's air quality CEQA significance thresholds for construction and operation, respectively. Because of a phased project schedule, the Proposed Project's construction activities may overlap with operation of *new* buildings. In the case of overlapping construction and operation activities, SCAQMD staff recommends adding the construction and operational peak daily emissions in pounds per day and comparing those emissions to SCAQMD's air quality CEQA significance thresholds for *operation*⁴ to determine the level of significance.

2

SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition of a number of aged buildings⁵, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the Final EIR.

3

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements

4

¹ Draft EIR. Page 2.0-31.

² *Ibid.*

³ Draft EIR. Table 3.1-5 and Table 3.1-6. Pages 3.1-23 and 3.1-23.

⁴ South Coast Air Quality Management District. *Air Quality Significance Thresholds*. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁵ Draft EIR. Table 2.0-1. Page 2.0-11.

unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

4

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS
LAC180208-03
Control Number

Letter Number A3: South Coast Air Quality Management District

21865 Copley Drive
Diamond Bar, CA 91765-4178

Response A3-1

The comment states that the agency has reviewed the Draft EIR for the proposed project. It presents no environmental issues within the meaning of CEQA and no specific response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response A3-2

The comment raises issues regarding overlapping Construction and Operational impacts to air quality.

The first operational phase of the proposed project would be completed by October 2020, after the completion of phase two of construction. Subsequent phase three construction emissions were added to operational emissions to account for construction emissions that occur while the second phase of the project is operational. It is important to note that operational emissions include completion of the entire project, so adding construction emissions would be a worst-case scenario as it is impossible for the project to operate in its entirety while construction is still occurring. Results of this analysis are shown in **Table 10.0-1** below.

**Table 10.0-1
Estimated Project Operational Emissions**

Scenario	Maximum Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM10	PM2.5
Maximum Existing Daily Emissions	16	49	161	<1	31	9
Maximum Project Daily Emissions	14	45	133	<1	41	11
Net Increase	-2	-4	-28	0	10	2
Maximum Construction Emissions (Phase 3)	48	10	27	<1	3	1
Total Net Combined Daily Emissions	46	6	-1	<1	13	3
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Localized Existing Emissions	6	<1	<1	<1	<1	<1
Localized Project Emissions	5	<1	<1	<1	<1	<1
Net Increase Localized Operational Emissions	1	0	0	0	0	0
Maximum Localized Construction Emissions (Phase 3)	48	8	23	<1	3	1
Total Net Combined Localized Emissions	49	8	23	<1	3	1
SCAQMD Localized Threshold	N/A	161	1,861	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No

Source: Impact Sciences, Inc. Emissions calculations are provided in *Appendix A*.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

Response A3-3

The comment raises issues regarding the removal of asbestos containing materials during demolition and/or renovation activities.

Section 3.3, Hazards and Hazardous Materials of the Draft EIR discusses the requirements for handling asbestos containing materials (ACMs) under SCAQMD Rule 1403, the federal Asbestos Hazard Emergency Response Act (AHERA) which provides guidance for the management of ACMs in schools, the California Occupational Safety and Health Administration (Cal OSHA) requirements for disturbance of ACMs, including removal operations, and the California Code of Regulations (CCR) Title 8, which regulates asbestos exposure in all work defined in the Code's Section 1502 including demolition or salvage of structures where asbestos is present, removal or encapsulation of materials containing asbestos, construction, alteration, repair, maintenance, or renovation of structures.

All removal of ACMs would be conducted by a licensed asbestos removal contractor using approved techniques and equipment and would be subject to the aforementioned rules and regulations.

Response A3-4

The comment states that per the state Public Resources Code and CEQA Guidelines, written responses must be provided to the SCAQMD's comments.

As demonstrated above, LAUSD has provided written responses as required.



SENATOR KEVIN DE LEÓN
PRESIDENT PRO TEMPORE

February 20, 2018

Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

I extend my full support to the currently proposed Roosevelt High School Comprehensive Modernization Project. Our students deserve state of the art facilities to provide them with a first-class education. Students from Boyle heights deserve a classroom where they will learn the various skills necessary for them to achieve success in the global economy.

I am pleased to see that the LAUSD Board of Education is willing to commit \$173 million dollars to Roosevelt High School. The demand and need for these improvements stem back to the 1968 walkouts when students spoke out against unequal learning conditions in the Eastside. Our youth and teachers have lacked 21st century facilities for decades, and the community is eager to see this modernization project become a reality.

School facilities have a profound impact on both our students and educators. A comfortable modern learning space can be a powerful tool for effective instruction. For too long, these students and this community have tolerated outdated facilities. I applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony.

Sincerely,

A handwritten signature in cursive script that reads "Kevin de León".

Kevin de León
Senate President Pro Tempore
24th Senate District

Letter Number A4: Kevin de León, Senate President Pro Tempore, 24th Senate District

California State Senate
District Office
1808 W. Sunset Blvd.
Los Angeles, CA 90026

Response A4-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



BOARD OF SUPERVISORS COUNTY OF LOS ANGELES

856 KENNETH HAHN HALL OF ADMINISTRATION / LOS ANGELES, CALIFORNIA 90012
Telephone (213) 974-4111 / FAX (213) 613-1739

Letter A5

HILDA L. SOLIS
SUPERVISOR, FIRST DISTRICT

February 20, 2018

Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

As Supervisor for the First District of the County of Los Angeles, I am pleased to learn that the Los Angeles Unified School District Board of Education has committed \$173 million dollars toward modernizing Roosevelt High School, a historic institution within the First District. The Comprehensive Modernization Project will bring four new buildings to the Roosevelt campus that will house 78 new classrooms, a performing arts center, a gymnasium, and a wellness clinic.

In 1968, students walked out from their classrooms in East Los Angeles, protesting the unequal conditions in Los Angeles Unified School District high schools. Today, the long overdue improvements to Roosevelt High School are a testament to how far we have come, and how far our students can go with the proper infrastructure to support their education.

School facilities have a profound impact on both our students and educators. The plans to modernize Roosevelt High School will make it a more suitable and inspiring environment for students, educators and Boyle Heights. For these reasons and many others, I applaud the project and believe it will positively impact our communities and our students for generations. I look forward to the ground breaking ceremony.

Please contact my staff, Taylor Dudley, with any questions at tdudley@bos.lacounty.gov or (213) 974-4111. Thank you.

Yours Sincerely,

HILDA L. SOLIS
Supervisor, First District

1

Letter Number A5: Hilda Solis, Supervisor, 1st District

Los Angeles County Board of Supervisors
856 Kenneth Hahn Hall of Administration
Los Angeles, CA 90012

Response A5-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0051
(916) 319-2051
FAX (916) 319-2151

DISTRICT OFFICE
1910 WEST SUNSET BOULEVARD, SUITE 810
LOS ANGELES, CA 90026
(213) 483-5151
FAX (213) 483-5166

E-MAIL
Assemblymember.Carrillo@assembly.ca.gov

Assembly California Legislature



WENDY CARRILLO
ASSEMBLYMEMBER, FIFTY-FIRST DISTRICT

COMMITTEES
APPROPRIATIONS
HEALTH
PUBLIC SAFETY
RULES
WATER, PARKS, AND WILDLIFE

April 6, 2018

Board of Education
Los Angeles Unified School District
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

I write to express my conditional support for the proposed Roosevelt High School Modernization Project. As an alumni of Roosevelt High School, and someone who grew up in Boyle Heights and City Terrace, I can attest that modernizing efforts would improve the school environment and culture. However, I also believe that the history of the school should be preserved and I am weary of a project that would tear down the "R" building (the original school structure) without efforts of historic preservation. Our community is deserving of owning and appreciating the buildings whose doors have witnesses and housed social change, student activism and a commitment to education for generations. If more affluent communities have been able to preserve their historic structures, that same level of effort should be made on the eastside.

This is one of the reasons I am cautiously optimistic of the \$173 million that the Los Angeles Unified School District Board of Education (LAUSD BOE) has allocated towards the proposed project at Roosevelt High School.

In March, we commemorated the 50th Anniversary of the Chicano/a Walkouts in East Los Angeles, in which the leaders of this movement demanded better school conditions and greater educational equity. This proposed project attempts to address some of those concerns. It is my most sincere hope that this project will improve the educational environment and safety of the students, as well as provide a more fulfilling educational experience overall, while not endangering the historic structure and nature of the "R" building on campus. Preserving our history and its many lessons for the present is of paramount importance to me.

School facilities have a profound impact on all who attend and work there, from students to teachers and administrators. This is particularly true in a place like Roosevelt, where historic facilities possess a significance beyond a physical structure. They are standing tools of instruction for all generations. I would like this project to assist students in feeling safer, and in turn to improve the educational outcomes for them and the surrounding community. However, we must strike a balance between improvement and historical preservation.

Sincerely,

Wendy Carrillo
Assemblymember
51st District
California State Assembly

WC/BPS



Printed on Recycled Paper

1

Letter Number A6: Wendy Carrillo, Assemblymember 51st District

California State Assembly
District Office
1910 W. Sunset Blvd, Suite 810
Los Angeles, CA 90026

Response A6-1

The comment includes a statement of conditional support of the proposed Project, and raises concerns regarding potential impacts to historical cultural resources as a result of implementation of the proposed Project.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding historical cultural resources concerns.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

CAPITOL OFFICE
P.O. BOX 942849
SACRAMENTO, CA 95814
(916) 319-2053
FAX (916) 319-2153

DISTRICT OFFICE
320 WEST 4TH STREET,
SUITE 1050
LOS ANGELES, CA 90013
(213) 620-4646
FAX (213) 620-6319

E-MAIL
Assemblymember.Santiago@
assembly.ca.gov



COMMITTEES
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PUBLIC SAFETY
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HIGHER EDUCATION
UTILITIES & COMMERCE

OFFICE OF ASSEMBLY MEMBER
MIGUEL SANTIAGO
FIFTY-THIRD ASSEMBLY DISTRICT

March 23, 2018

Letter A7

Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

RE: Roosevelt High School Comprehensive Modernization Project

Dear Board Members:

I am writing to express my strong support for the current proposed Roosevelt High School Comprehensive Modernization Project. I commend the Los Angeles Unified School District Board of Education (LAUSD) for committing \$173 million dollars towards the renovation and construction of new buildings within the Roosevelt campus.

The demand and need for these improvements stem back to the 1968 walkouts when students from Roosevelt and surrounding high schools protested against unequal learning conditions on the Eastside. Today, the long overdue improvements to Roosevelt High School are a testament to how far we have come, and also how far our students can go with the proper infrastructure to support their education.

School facilities have a profound impact on both our students and educators. LAUSD's Roosevelt High School Comprehensive Modernization Project is an investment for our students' future successes. I applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony.

If you have any questions, please feel free to reach out to my District Director, Mark Gonzalez, at (213) 620-4646 or Mark.Gonzalez@asm.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Miguel Santiago".

MIGUEL SANTIAGO

Assembly Member
Fifty-Third District

1

Letter Number A7: Miguel Santiago, Assemblymember, 53rd District

California State Assembly
District Office
320 West 4th Street, Suite 1050
Los Angeles, CA 90013

Response A7-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



Letter A8

GILBERT A. CEDILLO
COUNCILMEMBER
FIRST DISTRICT

March 22, 2018

Ms. Gwenn Godek
CEQA Advisor / CP
LAUSD / OEHS

Dear Ms. Godek:

I write to request a 45 day extension to the comment period pertaining to the Roosevelt Modernization Project. I believe that a good number of stakeholders have yet to be notified and would very much like to participate in this process.

A8

Sincerely,

Gilbert A. Cedillo
Councilmember, First District

CITY HALL 200 N. Spring St. Room 470 Los Angeles, CA 90012
Tel: (213) 473-7001 • Fax: (213) 473-7462

Letter Number A8: Gilbert A. Cedillo, Councilmember, 1st District

City of Los Angeles
City Hall
200 N. Spring Street, Room 470
Los Angeles, CA 90012

Response A8-1

The comment requests the extension of the statutory 45-day comment period on the Draft EIR for the proposed Project.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.



GILBERT A. CEDILLO
COUNCILMEMBER
FIRST DISTRICT

April 6, 2018

Submitted by email

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

RE: Roosevelt High School Comprehensive Modernization Project (Roosevelt Comp Mod) DEIR

Dear Mr. Paek:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Roosevelt High School Comprehensive Modernization Project. As a proud Roosevelt Rough Rider (Roosevelt High, 1972 and Los Angeles City Councilmember, I am writing to voice my concern over the proposed Roosevelt High Comprehensive Modernization project.

Since 1923, Roosevelt High has been an important neighborhood anchor for generations of diverse Boyle Heights students and residents. Like Sears Tower, Boyle Hotel, Los Angeles County General Hospital + USC Medical Center, and Evergreen Cemetery, Roosevelt High's original 1922 Auditorium and Classroom Building (also known as the R Building) is one of Boyle Heights' most recognized and cherished community touchstones. Roosevelt High has served generations of diverse students and holds a lifetime of community memories. This neighborhood heritage provides a sense of place and belonging for residents who too often have been left out of discussions of how their neighborhood will evolve over time.

As currently proposed, LAUSD will demolish a National Register-eligible historic district associated with the nationally significant 1968 East L.A. Blowouts. Among the buildings proposed for demolition in the Roosevelt Comprehensive Modernization project is Roosevelt High's R Building, a primary contributor to the historic district and an individually eligible historic resource.

With such few sites associated with Latino heritage landmarked at the local, state, and national level, stewards of our shared cultural heritage must be reminded of their important role in protecting known Latino heritage sites threatened by demolition, neglect, inappropriate development, or insensitive public policy. The National Park Service's American Latino Theme Study has highlighted the importance of places associated with the 1968 East L.A. Blowouts to the broader history of Latino civil rights. Roosevelt High, along with four other Eastside high schools, including Lincoln High, which is in my council district, achieved national attention in March 1968 when Chicano students organized and led a series of walkouts and related activities to demand educational equality from the Los Angeles Unified School District (LAUSD). In 2014, SurveyLA, a comprehensive citywide survey of historic resources, identified Roosevelt High as eligible for listing in the National Register. LAUSD's own Supplemental Historic Resource Evaluation Report confirmed this finding in 2017. By preserving and rehabilitating the schools where



student activism and the fight for Chicano civil rights made meaningful national impact, LAUSD could embrace the role of historic places in the process of educating students.

We all agree that students deserve safe and high-quality facilities. Preserving and rehabilitating the R Building does not stand in the way of providing a 21st century educational facility. By incorporating Roosevelt High's R Building into the campus-wide modernization (Alternative 2), LAUSD will invest in an important neighborhood anchor that will continue to meet the needs of diverse students for generations to come. Alternative 2 meets most of the Roosevelt High Comprehensive Modernization project's overall objectives. By further, careful study of site planning issues, I believe that Alternative 2 could meet more project objectives.

I look forward to helping find a way to include the preservation and rehabilitation of the R Building in the campus-wide modernization.

Sincerely,



Gilbert A. Cedillo
Councilmember,
First District

Letter Number A9: Gilbert A. Cedillo, Councilmember, 1st District

City of Los Angeles
City Hall
200 N. Spring Street, Room 470
Los Angeles, CA 90012

Response A9-1

The comment raises concerns regarding potential impacts to historical cultural resources as a result of implementation of the proposed Project.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding historical cultural resources concerns.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

March 23, 2018

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Attn: Edward Paek

Dear Mr. Paek,

As the Los Angeles City Councilmember representing the Boyle Heights community, while public discourse has shown local support for the Roosevelt High School Modernization Project, I want to ensure that Roosevelt's important history and culture are preserved, prioritized and maintained. Founded in 1922, the Roosevelt High School campus has immense significance and importance for Boyle Heights and our Eastside communities, playing a critical and central role in the development of a diverse student body, as well as for the Chicano Movement and in particular the 1968 Blowouts. As such, I would like to see key historical elements preserved including:

- Preservation, relocation, and proper handling of the Lindbergh Fountain, which should move to a centralized location on campus that would include a commemorative plaque, outlining the history and importance of the Fountain.
- Preservation and relocation of the Japanese Garden to a centralized part of campus.
- Preservation and centralized relocation of the R building murals that commemorate the history of the Chicano Movement, our heritage, and our resilience.
- Emphasis on school spirit in the new school's design.

In addition to the incorporation of the historical elements, I would like to see special attention given to our students' safety with the proposed main entrance and new administration building relocating to 4th Street. It is important to work closely with our Department of Transportation early in the process to discuss a traffic plan, signage, curb painting, or any other recommended measures to keep students safe as they walk along and get picked up and dropped off on busy corridor and congested street.

Lastly, I would like to see dust mitigation and suppression prioritized and surrounding residents who live nearby engaged and informed through every step of the construction process about noise control, dust mitigation and traffic control. Since construction will take place during the school year, students and their families must be informed of this process and dust mitigation must be fully suppressed for the health and safety of all, especially during school hours.

Sincerely,

José Huizar
Councilmember, 14th District

1

2

3

Letter Number A10: Jose Huizar, Councilmember, 14th District

City of Los Angeles
City Hall
200 N. Spring Street, Room 465
Los Angeles, CA 90012

Response A10-1

The comment raises concerns regarding potential impacts to historical cultural resources as a result of implementation of the proposed Project. Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding historical cultural resources concerns.

Culturally important elements and spaces on the Roosevelt HS campus are extensively discussed in the *Theodore Roosevelt Senior High School Cultural Analysis* prepared by PCR (now ESA) in February 2017 and included in the technical appendices of the Draft EIR. The memorandum provides background, physical descriptions, and recommendations for features such as the Lindbergh Fountain, class tiles, Japanese Garden, central quad and gazebo, benches, and murals.

With regard to the Lindbergh Fountain and the Japanese garden, these elements would be relocated, but retained as part of the proposed Project. As recommended in the report, the Fountain would be restored to its historical appearance to the extent feasible. The Japanese Garden would be relocated to an area of the campus that is easily accessible to students. Existing landscaping features, such as mature plantings, monuments, and other elements would be relocated and reused to the extent feasible. There is archival information and historical photographs housed in the Japanese American National Museum archives and an excellent publication about Japanese gardens published by the NPS Manzanar National Historic Site, which could be consulted during a redevelopment plan to gather design concepts for a new garden. Complete documentation of both features, including drawings, photographs, and other documentation would be kept as archival records and/or for display within a school building. The campus murals are powerful expressions of the Roosevelt HS student social activism, culture, and community struggles. The report discusses four exterior murals and one interior mural, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural. In addition, the *El Plan del Pueblo – Boyle Heights*, prepared by the East LA Community Corporation, identifies the *Anahuac* mural, located along the perimeter retaining wall at Mott Street and 6th Street as one of cultural significance and the longest and largest mural in Boyle Heights.⁹

⁹ https://issuu.com/eastlacommunitycorporation/docs/plandelpueblo_english_digitalversio

As part of the proposed Project, Building 1, which contains the Harvey Milk Day of Service mural and the portable buildings on which the four exterior murals are painted would all be demolished or removed. While LAUSD does not have a formal mural policy, artists are typically required to complete a license agreement which waives all rights to any mural painted on LAUSD property. In the absence of such a license agreement, the mural would be subject to the California Art Preservation Act, under which LAUSD would be obligated to contact the artist and request a waiver prior to removal. In either case, the murals would be documented and retained in archival records. As recommended by the report, the proposed Project includes areas where new murals can be painted.

Response A10-2

The comment raises concerns regarding traffic and student safety following the proposed relocation of the main entrance to the school.

Regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans Safe Routes to School (SRTS) Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing

guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events

- o Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

SC-T-4 LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

The proposed Project would also implement the following mitigation measure to help maintain student safety during construction:

MM-PED-1: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD. This requirement shall be included on all construction documents.

Response A10-3

The comment raises concerns regarding noise, fugitive dust, and traffic control during Project construction.

Analysis in **Section 3.4, Noise** of the Draft EIR acknowledges that construction activities would elevate ambient noise levels above the LAUSD exterior noise level (67 dB(A) Leq) at one or more of the adjacent sensitive receptors, as well as exceed the City's threshold of resulting in an increase of more than 5 dB(A).

As previously discussed, there are a number of standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are the applicable noise-reduction features to be included in the Project.

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 noise is not generated by unmaintained equipment.

SC-NOI-1 LAUSD shall include features such as sound walls, building configuration, and other design features in order to attenuate exterior noise levels on a school campus to less than 70 dBA L10 or 67 dBA L_{eq}.

SC-NOI-9 LAUSD shall prepare a noise assessment. If site-specific review of a school construction project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. Exterior construction noise levels exceed local noise standards, policies, or ordinances at noise sensitive receptors. LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:

Source Controls:

Time Constraints – prohibiting work during sensitive nighttime hours

Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM)

Equipment Restrictions – restricting the type of equipment used

Noise Restrictions – specifying stringent noise limits

Substitute Methods – using quieter methods and/or equipment

Exhaust Mufflers – ensuring equipment have quality mufflers installed

Lubrication & Maintenance – well maintained equipment is quieter

Reduced Power Operation – use only necessary size and power

Limit Equipment On-Site – only have necessary equipment onsite

Noise Compliance Monitoring – technician on site to ensure compliance

Quieter Backup Alarms – manually-adjustable or ambient sensitive types Path Controls

Noise Barriers – semi-permanent or portable wooden or concrete barriers

Noise Curtains – flexible intervening curtain systems hung from supports

Enclosures – encasing localized and stationary noise sources

Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage, and maintenance of equipment

Receptor Controls:

Window Treatments – reinforcing the building’s noise reduction ability

Community Participation – open dialog to involve affected residents

Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints the District shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.

Temporary Relocation – in extreme otherwise unmitigatable cases. Temporarily move residents or students to facilities away from the construction activity.

As previously discussed **SC-T-4** would maintain traffic and pedestrian safety during construction in the Project area.

In addition, Mitigation Measures **MM-NOI-1** through **MM-NOI-10** would reduce construction noise level increases primarily by requiring the use of sound attenuation walls between construction activities and sensitive receptors. Further **MM-NOI-11** through **MM-NOI-12** would truck noise in residential areas to the extent feasible.

Construction Noise – General On-Site Construction Activities

MM-NOI-1 The Project shall comply with the City of Los Angeles Building regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner’s agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

MM-NOI-2 Construction and demolition activities shall be scheduled so as to avoid, to the extent feasible, simultaneously operating several pieces of equipment that cause high noise levels.

- MM-NOI-3** The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers.
- MM-NOI-4** Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- MM-NOI-5** Barriers such as plywood structures or flexible sound control curtains shall be erected between the proposed Project and adjacent sensitive receptors to minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 10 dB(A) and block the line-of-sight between the Project site and these adjacent land uses. This specification shall be included on all project plans.
- MM-NOI-6** The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices capable of attenuating sound by 3 dB(A) or more. This specification shall be included on all project plans.
- MM-NOI-7** Demolition of concrete/asphalt shall not be done during school hours when children are playing in the adjacent athletic fields.
- MM-NOI-8** The construction staging area shall be as far from sensitive receptors as possible.
- MM-NOI-9** Two weeks prior to commencement of construction, notification shall be provided to the off-site residential, school, and church uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- MM-NOI-10** A sonic pile driver shall be used in place of an impact pile driver to reduce noise and vibration during pile drilling/driving activities. This specification shall be included on all project plans.

Construction Noise – Off-Site Haul Truck Activities

- MM-NOI-11** All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. This specification shall be included on all project plans.

MM-NOI-12 Any haul route for haul trucks shall avoid residential streets to the extent possible.

Following implementation of Mitigation Measures **MM-NOI-1** through **MM-NOI-10** the new ambient exterior noise levels during construction would be 58.9 dB(A) Leq at Hollenbeck Middle School and 64.7 dB(A) Leq at on-site uses, below LAUSD's 67 dB(A) Leq threshold. The new ambient exterior noise levels during construction at off-site residences would be a maximum of 68.4 dB(A) Leq, which is below the City's 75 dB(A) threshold.

During mitigated construction activities, the interior ambient noise level would also be reduced to below the LAUSD threshold (45 dB(A)) for classrooms located on the Hollenbeck Middle School, as well as on-site classrooms (**Table 3.4-8**). Thus, construction related impacts would be less than significant.

Analysis in **Section 3.1, Air Quality** of the Draft EIR acknowledges that construction operations could result in manmade fugitive dust sources during soil disturbing activities. The following South Coast Air Quality Management District (SCAQMD) rules would be applicable to the Project, and would be applied to all work related to soil disturbing activities:

Rule 403. The purpose of this rule is to reduce the amount of particulate matter entrained in the ambient air as a result of manmade fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust sources. It requires the use of best available control measures to minimize fugitive dust emissions. This is applicable to soil excavation and handling operations during the removal action, excavation and grading activities, as well as exhaust from construction equipment.

Rule 1466. This rule imposes requirements to minimize the amount of off-site fugitive dust emissions containing toxic air contaminants by reducing particulate emissions associated with earth-moving activities, including soil excavation, handling, stockpiling, loading, etc. This is applicable to soil excavation and handling operations during the removal action, as well as construction excavation and grading activities.

The following actions are currently recommended to implement Rule 403 and have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the dust generation source:

- Apply water and/or approved nontoxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days).
- Replace ground cover in disturbed areas as quickly as possible

- Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content.
- Water active grading sites at least twice daily during construction activities.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or should maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code.
- Sweep streets at the end of the day if visible soil material is carried over to adjacent roads.
- Install wheel washers or gravel construction entrances where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the sites each trip.
- Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads.

In addition, the Project would be required to implement the following SCs related to the control of fugitive dust during construction:

SC-AQ-3 LAUSD's construction contractor shall:

- Maintain slow speeds with all vehicles
- Load impacted soil directly into transportation trucks to minimize soil handling
- Water/mist soil as it being excavated and loaded onto the transportation trucks
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site
- Minimize soil drop height into transportation trucks or stockpiles during dumping
- During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed
- Place stockpiled soil on polyethylene sheeting and cover with similar material
- Place stockpiled soil in areas shielded from prevailing winds

SC-AQ-4 **Fugitive Dust**

- 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.

10.0 Responses to Comments

- 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.

Implementation of these measures would minimize fugitive dust from construction activities to the maximum extent feasible.



Progress through Commitment to Excellence

2/21/2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

Alma Family Services is writing to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate. Alma Family Services was established in East Los Angeles in 1975 by parent advocates to provide bilingual mental health and other social services for members of the community including those with an intellectual disability. The agency now provides a wide range of services to children, youth and families including prevention services, mental health and social services, preschool and after-school programs and various peer-based support groups for children, transition age youth, and families. Since 2009, Alma Family Services has partnered with the Los Angeles Mayor’s Office, the Los Angeles County Department of Mental Health and the Los Angeles Unified School District to offer school-based mental health services, youth development and gang prevention services at Roosevelt High School.

We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of ‘68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

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We’d like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Jean G. Champommier, Ph.D.
President/Chief Executive Officer
Alma Family Services Corporate Office
900 Corporate Center Drive, #350
Monterey Park, CA 91754
(323) 526-4016 Ext. 206 / (323) 526-4096 Fax
Email: jeanc@almafamilyservices.org

Letter No. B1: Alma Family Services

900 Corporate Center Drive, #350
Monterey Park, CA 91754

Response B1-1

The comment provides introductory information about Alma Family Services and includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



February 21, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

**Executive Board –
2017-2018**

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Alicia Maldonado
*Mockingbird
Communications*

Patricia Siqueiros
Variety Boys & Girls Club

Zulema Velazquez
State Farm Insurance

Beatriz Zaragoza
All State Insurance

To Whom It May Concern,

We, the Boyle Heights Chamber of Commerce, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

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We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Lahoda".

Jennifer Lahoda
President of the Board
Boyle Heights Chamber of Commerce

Letter No. B2: Boyle Heights Chamber of Commerce

2900 E. Olympic Blvd.
Los Angeles, CA 90033

Response B2-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



Boyle Heights Neighborhood Council
2130 E. First St., Suite 110, Los Angeles, CA 90033
www.bhnc.net



Table with 6 columns and 4 rows listing council members and their roles: President, Vice President, Secretary, Treasurer, Outreach & Events, Planning & Land Use.

RE: Roosevelt HS Comprehensive Modernization Program Draft EIR

Date: 2018/March 28

BHNC/PLUC Meetings

On March 28th, 2018 the BHNC Board discussed and voted to [SUPPORT] the Roosevelt HS Comprehensive Modernization Project Draft EIR (RHS Modernization Project), including support of Alternative 2 and issue the following letter.

February 8, 2018
March 8, 2018
March 28, 2018

Vote Tally: [0] recusals, [2] abstentions, [1] nays, [8] ayes

The BHNC, after hearing a presentation from representatives of the RHS Modernization Project, and testimony from the public at the BHNC PLUC meetings on February 8th,2018; engaging in public discussion on March 8th, 2018 and on March 28th, 2018 issue the following:

The Stakeholders of Boyle Heights have expressed primarily concerns of safety along the Fourth Street entrance, Preservation/Demolition of a Cultural Resource (the "R" Building), and a lack of a proper presentation on the Alternative options.

The BHNC acknowledges that safety along Fourth Street is a concern, but given that the nature of the entrance is not intended for drop-off/pick-up, will be used primarily for pedestrian traffic and that additional measures of traffic safety included within the proposal will be adequate.

That while the BHNC recognizes and supports the Roosevelt Modernization Project, including the enhancements of the existing educational facilities as needed. We also believe that the preservation and conservation of the "R" building as a cultural and historic resource is vitality important to Roosevelt and Boyle Heights. Acknowledged by the Draft EIR as a qualifying candidate under the LAUSD HCS (page 170 & 171), and for the National and California Registrar (page 176 & 177).

The 1968 Walkout and subsequent Walkouts the following years and decades, have served as a reminder of the Civil Right's movement in Boyle Heights. As inspiration to our youth and the struggle for equality in this country. As marked by the LAUSD's recognition of the event for the 50th Anniversary. And stands as a significant reason drawing the public's interest in visiting or moving to the community.

The Impact of the loss of history will be such that it will not go unnoticed by this community and the world at large who look to Boyle Heights for it's passion in civil struggles. Therefore we urge the LAUSD to consider Alternative 2 as a viable recommendation to satisfy both the modernization and restoration that will continue to thrive in our Boyle Heights Community. We also ask that the LAUSD extend the public comment period In order that the public can further review these details of Alternative 2 and have the opportunity to provide feed back.

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- Boyle Heights Neighborhood Council

Letter No. B3: Boyle Heights Neighborhood Council

2130 E. First Street, Suite 110
Los Angeles, CA 90033

Response B3-1

The comment provides introductory information and states general concerns about the Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B3-2

The comment raises concerns regarding traffic and student safety following the proposed relocation of the main entrance to the school. Pedestrian Safety was evaluated in **Section 3.5, Pedestrian Safety** of the Draft EIR.

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Further, regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: The Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This Guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds

- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Section 3.6, Traffic and Transportation in the Draft EIR is based on a traffic study performed for the proposed Project by KOA Corporation on December 19, 2017 (included as Appendix 3.6 to the Draft EIR). Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

As the proposed Project would not result in an increase in enrollment, the Project is not expected to create new vehicle trips, and there would be no Project impacts. Under the Future Conditions with Project Construction (2018), the intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant

Response B3-3

The comment includes statements in general support of the proposed Project, but raises concerns regarding the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding historical cultural resources concerns.

Response B3-4

The comment requests the extension of the statutory 45-day comment period on the Draft EIR for the proposed Project.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.

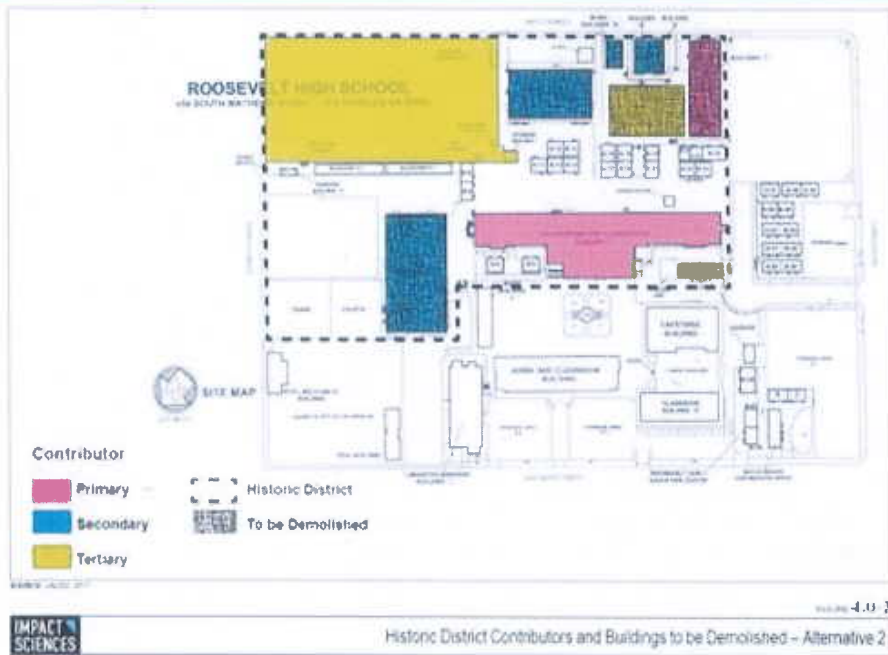


The Coalition to Preserve LA believes in modernization guided by informed, community input, and inclusive community outreach. The anemic community outreach and engagement we have observed throughout Boyle Heights regarding the Roosevelt Project is best summarized by this fact:

The Draft Environmental Impact Report was released 3 days ago, but only in ENGLISH, NOT IN SPANISH. Not even the “Executive Summary” is available in Spanish – a promise made by LAUSD on several occasions.

Why? After all, according to LAUSD’s *Office of Environmental Health and Safety*, “the DEIR will be available for review during the 45-day public review period from February 6, 2018 to March 23, 2018.”

Is this a form of negligence? Ineptitude? Discrimination? Do Spanish speakers deserve a lesser public review period because they speak Spanish? Is this not one of the issues that energized students in 1968 to take a stand against an unjust system that discriminates against Mexican-Americans?



Will LAUSD commit to providing a SPANISH VERSION for the 77% of Boyle Heights families who speak SPANISH at home, families with kids aged 5-17, precisely the students that will be directly impacted by this project? Is it fair to demand for a new 45-day clock once the Spanish document is provided, for those Spanish speakers? The Coalition to Preserve LA hopes so. In the meantime, here is a rough Spanish translation of a very important recommendation described in the DEIR:

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Alternative 2 – Rehabilitation of Building 1

Under Alternative 2, Building 1 would be rehabilitated. The renovation would consist of seismic, ADA accessibility and life/fire safety upgrades to meet current DSA requirements and LAUSD standards. The purpose of this alternative is to renovate Building 1 in a manner that the historic character/character defining features of the building would be retained and renovated

Alternativa 2 - Rehabilitación del edificio 1

En la Alternativa 2, el Edificio 1 sería rehabilitado. La renovación consistiría en mejoras sísmicas, de accesibilidad de ADA y de seguridad de vida / contra incendios para cumplir con los requisitos actuales de DSA y los estándares de LAUSD. El objetivo de esta alternativa es renovar el Edificio 1 de forma tal que el carácter / carácter histórico que define las características del edificio se conserven y renueven.

Letter No. B4: Coalition to Preserve LA

Coalition to Preserve LA
jilltepleystewart@gmail.com

Response B4-1

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net

Roosevelt Comp Mod

Dear Mr. Paek:

The Coalition to Preserve LA, a non-profit with several thousand people on its mailing list, urges you to preserve Roosevelt High School Building 1, a fine and irreplaceable historic structure that embodies the spirit and stories of early 1900s multiculturalism and racial understanding, and positive Vietnam War-era ethnic activism among young people in America.

Coalition to Preserve L.A. is a citywide movement of concerned residents who believe in open government, people-oriented planning, equitable housing and environmental stewardship of Los Angeles through advocacy and empowering the community.

The Roosevelt High School campus was identified as a National Register-eligible historic district for its cultural associations with the Blowouts of 1968 and the Chicano Civil Rights movement, and this alone should qualify this important structure for preservation status. LAUSD has an obligation to consider meaningful preservation alternatives alongside its proposed demolition project.

LAUSD can create an upgraded campus while still retaining some of the most historic buildings associated with the Blowouts. Investment in Roosevelt High through upgrades is a great thing for the community, but it doesn't need to come at the expense of community, city, and state history.

Roosevelt High is very significant for the Boyle Heights community and all of Southern California, for the history that took place there is of national significance. Students at Roosevelt High deserve a campus that respects the community's very own contributions to Latino and Chicano history—that history is inspiring and should be celebrated, and the best way to celebrate that history is with a physical link to the past, and not leave students to only read about it in a textbook.

KEY POINTS:

1. In 1968 the Eastside student Blowouts protested the public education system and called for improved facilities and culturally relevant curriculum, and Building 1 was filled with planning and student meetings, both planned and impromptu hallway gatherings. And as the *Los Angeles Times* reported, Sal Castro, an Eastside high school teacher and leading activist in the 1960s, said he believed the blowouts

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should be seen as the equivalent of black civil rights touchstones like the Selma march or the lunch-counter sit-ins. To him, they jump-started the Chicano rights movement.

In 2009, during Obama's two-day swing through Southern California, he traveled to Kern County to dedicate the Cesar E. Chavez National Monument, *the first such site to honor a contemporary Mexican American*. Castro had asked Obama to squeeze in a second ceremony to dedicate a plaque for the Eastside students at Hazard Park near County-USC Medical Center, where they had gathered during the blowouts. The White House imprimatur, he believes, would elevate the walkouts to their proper place in history.

Castro was happy he was being honored but also felt the labor leader's monolithic stature had overshadowed the struggles of urban Latinos. "Cesar Chavez unionized 16,000 farmworkers," Castro wrote. By contrast, 48,000 students marched in the blowouts.

In fact, the Draft Supplemental Historic Resource Evaluation Report conducted by ASM Affiliates identified Roosevelt High School's campus as an historic district given the potential eligibility in criteria listed for the National Register of Historic Places and the California Register of Historical Resources. The study evaluated the Blowouts as a potentially significant event as well as the involvement of Sal Castro as a potentially significant person during the Blowouts.

2. Long before the Blowouts, Building 1, also known as "R," and known in the old days as Building A, played a unique and lasting role in LA's early acceptance of multiculturalism.

In the era between World Wars I and II, an estimated 40,000 to 50,000 Jews, 15,000 Mexicans and more than 5,000 Japanese, with notable populations of Armenians, Italians, Anglos, African Americans and Russian Molokans — a persecuted, Christian sect that split from the Russian Orthodox Church — thrived in Boyle Heights. After 1945, a trickle of Holocaust survivors arrived there too. The children of all these ethnic groups met, played together and formed friendships at Roosevelt High School.

Building 1 was the site of the publication of a rare, multiethnic school newspaper that embraced the multicultural miracle unfolding in Boyle Heights, *The Rough Rider*. A headline in the *Rough Rider* on Nov. 7, 1940, read, "Bees Triumph Over Favored Fremont Squad," and, as the author wrote of Roosevelt's players, "Kitioka completed a forward to end Reznikoff, who went over the end zone for the second tally of the day." On Nov. 6, 1941, *The Rough Rider* noted that 23 seniors were in the honor society, six of them Japanese and 12 Jewish, and that the Japanese Club held a joint meeting with a Mexican school club, *Los Caballeros*.

According to the Abraham Hoffman book, "Boyle Heights: Recollections and Reminiscences of the Boyle Heights Jewish Community in Los Angeles, 1920s-1960s" (Western States Jewish History Association, 2011):

George Masuki was elected president of the graduating class on March 12, 1942, just before the U.S. government ordered the evacuation of all Japanese Americans from the West Coast. In a farewell note, Masuki wrote, "I am rather confused as to what will become of me when I leave school." As publisher Epstein observed, the young people of Boyle Heights absorbed diversity before diversity guidelines existed.

Building 1 was the center of the action, and one of the noteworthy students was Jesse Dumas, an African American elected president of Roosevelt High School just after World War II. As former student Hershey Eisenberg told the Jewish Journal in 2002:

"Roosevelt High School was the melting pot," Eisenberg continues. "We had Japanese students. We had a big Molokan Russian population who lived in the Flats." Eisenberg recalls occasional friction between Jewish teens and Mexican gang members. But overall, he says, "we all got along very well. The first year I went to Roosevelt, we had a black kid, Jesse Dumas, who was president."

3. The Coalition also has deep concerns about LAUSD's outreach in the community regarding Building 1 demolition versus preservation.

It is now clear that many residents were unaware of the true scope of the project or that LAUSD was required to consider preservation options. That fact wasn't relayed to residents and stakeholders. LAUSD presented the project as a "modernization" of the school, with no indication of a proposed demolition, or partial demolition, of historic buildings on the campus. LAUSD officials referred to the fate of Building 1 as a "modernization," a misleading term that never indicated a demolition was under consideration. An LAUSD-hosted community meeting involved minimal local outreach, just 25-30 people attended, and attendees said LAUSD did not alert those residents to the loss of a major historic building or seek their discussion of that.

Why did it require an anonymous stakeholder, just two weeks ago, to canvass the neighborhood with flyers, urging residents to take action to save Building 1? A resident alerted the Boyle Heights Neighborhood Council just last week. Can you imagine LAUSD withholding this crucial information about a beloved local historic site, from the Sherman Oaks Neighborhood Council or the Bel Air-Beverly Crest Neighborhood Council?

A flyer from LAUSD about the upcoming meeting said nothing to parents about demolition but an up and coming modernization. A local resident who attended found detailed drawings from architects and engineers of new buildings going up and the map of the new plan -- but no images of what would be lost. A distracting Dodger ballgame played on a screen while this crucial informational meeting unfolded.

4. We understand Building 1 needs seismic work, but LAUSD should make every effort to save this centerpiece of Roosevelt High, even if it costs more. A key issue that LAUSD must address under

CEQA is the extensive negative effects on greenhouse gas emissions if LAUSD chooses to demolish rather than to retrofit. Have they completed this assessment?

As shown by the National Trust for Historic Preservation in its study, "[The Greenest Building](#)" ([link to pdf download here](#)), saving and retrofitting major buildings instead of demolishing them prevents vast tonnages of embedded carbon from the existing building materials and their manufacturing, from being released back into the atmosphere. In other words, Building 1 is an important carbon sink, and even if LAUSD builds the most expensive LEED qualified building to replace Building 1, that LEED building would require many many years of operation -- probably decades -- to make up for the release of this embedded carbon due from this extensive demolition.

4

Thank you.

Sincerely,

Jill Stewart
Executive Director
Coalition to Preserve LA
jilltepleystewart@gmail.com

Letter No. B5: Coalition to Preserve LA

Jill Stewart
Executive Director
Coalition to Preserve LA
jilltepleystewart@gmail.com

Response B5-1

The comment provides introductory information about the Coalition to Preserve LA (CP2PLA) and a statement in opposition to the Project, due to the historical nature of the campus buildings. Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B5-2

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus. It presents no environmental issues within the meaning of CEQA and no specific response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response B5-3

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B5-4

The comment raises concerns regarding greenhouse gas emissions.

A full discussion and an analysis of the proposed Project's potential contribution to greenhouse gas emissions was included as **Section VII, Greenhouse Gas Emissions** in the Initial Study that was provided as **Appendix 1.0** of the Draft EIR. Impacts were found to be less than significant.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net

Roosevelt Comp Mod

Dear Mr. Paek:

The Coalition to Preserve LA urges you to preserve and renovate Roosevelt High School Building 1, a fine and irreplaceable historic building that embodies the spirit of early multiculturalism, racial understanding and positive activism among young people in America.

As described in the DEIR, Building 1 meets the eligibility criteria for the National Register of Historic Places and the California Register of Historical Resources. The study evaluated the Blowouts (also known as the Walkouts) as a significant event and the involvement of Sal Castro as a significant person during the Blowouts.

Sal Castro

In 1968, the Blowouts, organized in part by educator Sal Castro, protested the public school system, calling not only for improved facilities, but culturally relevant curriculum as well. The *Los Angeles Times* reported Sal Castro believed the blowouts were the equivalent of black civil rights touchstones like the Selma march or the lunch-counter sit-ins. To him, they jump-started the Chicano Civil Rights movement.

In 2009, during Obama's two-day swing through Southern California, he traveled to Kern County to dedicate the Cesar E. Chavez National Monument, *the first such site to honor a contemporary Mexican American*. Castro asked Obama to squeeze in a second ceremony to dedicate a plaque for the Eastside students at Hazard Park near County-USC Medical Center, where they had gathered during the blowouts. The White House imprimatur, he believed, would elevate the Walkouts to their proper place in history.

Castro was happy Chavez was being honored but also felt the labor leader's monolithic stature had overshadowed the struggles of urban Latinos. "Cesar Chavez unionized 16,000 farmworkers," Castro wrote. By contrast, **48,000 students marched in the blowouts.**

Building 1 (The "R" Building)

Long before the Blowouts, Building 1, known in the old days as Building R, played a unique and lasting role in LA's early acceptance of multiculturalism.

In the era between World Wars I and II, an estimated 40,000 to 50,000 Jews, 15,000 Mexicans and more than 5,000 Japanese, with notable populations of Armenians, Italians, Anglos, African Americans and Russian Molokans — a persecuted, Christian sect that split from the Russian Orthodox Church — thrived in Boyle

Heights. After 1945, a trickle of Holocaust survivors arrived there too. The children of all these ethnic groups met, played together and formed friendships at Roosevelt High School.

Building 1 was the site of the publication of a rare, multiethnic school newspaper that embraced the multicultural miracle unfolding in Boyle Heights, *The Rough Rider*. A headline in the *Rough Rider* on Nov. 7, 1940, read, "Bees Triumph Over Favored Fremont Squad," and, as the author wrote of Roosevelt's players, "Kitioka completed a forward to end Reznikoff, who went over the end zone for the second tally of the day." On Nov. 6, 1941, *The Rough Rider* noted that 23 seniors were in the honor society, six of them Japanese and 12 Jewish, and that the Japanese Club held a joint meeting with a Mexican school club, *Los Caballeros*.

According to the Abraham Hoffman book, "Boyle Heights: Recollections and Reminiscences of the Boyle Heights Jewish Community in Los Angeles, 1920s-1960s" (Western States Jewish History Association, 2011):

George Masuki was elected president of the graduating class on March 12, 1942, just before the U.S. government ordered the evacuation of all Japanese Americans from the West Coast. In a farewell note, Masuki wrote, "I am rather confused as to what will become of me when I leave school." As publisher Epstein observed, the young people of Boyle Heights absorbed diversity before diversity guidelines existed.

Building 1 was the center of the action, and one of the noteworthy students was Jesse Dumas, an African American elected president of Roosevelt High School just after World War II. As former student Hershey Eisenberg told the Jewish Journal in 2002:

"Roosevelt High School was the melting pot," Eisenberg continues. "We had Japanese students. We had a big Malkan Russian population who lived in the Flats." Eisenberg recalls occasional friction between Jewish teens and Mexican gang members. But overall, he says, "we all got along very well. The first year I went to Roosevelt, we had a black kid, Jesse Dumas, who was president."

Community Outreach

The Coalition to Preserve LA has deep concerns about LAUSD's outreach in the community regarding Building 1 demolition.

It is now clear that many residents were unaware of the true scope of the project or that LAUSD was required to consider preservation options. That fact wasn't relayed to residents and stakeholders. LAUSD presented the project as a "modernization" of the school, with no indication of a proposed demolition, or partial demolition, of historic buildings on the campus. LAUSD officials referred to the fate of Building 1 as a "modernization," a misleading term that never indicated a demolition was under consideration. An LAUSD-hosted community meeting involved minimal local outreach, just 25-30 people attended, and attendees said LAUSD did not alert those residents to the loss of a major historic building or seek their discussion of that.

Why did it require a concerned stakeholder to canvass the neighborhood with flyers, urging residents to act to save Building 1? A flyer from LAUSD said nothing to parents about demolition.

Alternative 2 – Rehabilitation of Building 1

The Coalition to Preserve LA agrees Building 1 needs seismic work, restoration, and renovation, and therefore fully supports “Alternative 2,” as described in the DEIR: Under Alternative 2, Building 1 would be rehabilitated. The renovation would consist of seismic, ADA accessibility and life/fire safety upgrades to meet current DSA requirements and LAUSD standards. The purpose of this alternative is to renovate Building 1 in a manner that the historic character/character defining features of the building would be retained and renovated following Secretary of the Interior Standards and the significant and unavoidable impact associated with loss of the individually eligible resource (Building 1) would be avoided.

3

Is LAUSD in Violation of ?

The Coalition to Preserve LA and the Boyle Heights Community agree that “Alternative 2,” which includes the renovation of Building 1, can address its current state of disrepair. Demolition is not necessary. What follows are excerpts of the law and descriptions of apparent violations of Prop 98, as were described by numerous teachers and students on Februar

y 21, 2018:

BACKGROUND

In November 1988, California voters passed [Proposition 98](#), also known as The Classroom Instructional Improvement and Accountability Act. This ballot initiative provides California's public schools with a stable source of funding. In return, all public schools in California are required annually to prepare School Accountability Report Card (SARCs) and disseminate them to the public. SARCs are intended to provide the public with important information about each public school and to communicate a school's progress in achieving its goals.

In the years since the passage of Proposition 98, additional requirements for school accountability reporting and dissemination have been established through [legislation](#). Most SARC requirements are codified in California Education Code (EC) [Sections 33126 and 33126.1](#). In addition, similar requirements are contained in the federal Elementary and Secondary Education Act (ESEA) legislation. Most SARC requirements are codified in California Education Code (EC) [Sections 33126 and 33126.1](#).

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WHAT THE LAW SAYS

33126. (8) Safety, cleanliness, and adequacy of school facilities, including any needed maintenance to ensure good repair as specified in Section 17014, Section 17032.5, subdivision (a) of Section 17070.75, and subdivision (b) of Section 17089.

33126.1. (3) A summary statement of the condition of school facilities, as required by Section 17014, Section 17032.5, subdivision (a) of Section 17070.75, and subdivision (b) of Section 17089. The department shall provide examples of summary statements of the condition of school facilities that are acceptable and those that are unacceptable.

33126.5. The State Allocation Board, in cooperation with the Superintendent of Public Instruction, shall develop and maintain an automated school facilities inventory that is capable of indicating the statewide percentage of facility utilization and projecting school facility needs five years in advance, in order to permit the board to study alternative proposals for the allocation of funds for new construction, maintenance, and rehabilitation.

33128. (a) The standards and criteria to be adopted by the State Board of Education pursuant to Section 33127 shall include, but not be limited to, comparisons and reviews, including appropriate methods of projection, of all of the following: (F) Facilities maintenance funding adequate to preserve functionality of facilities for their normal life

WHAT ROOSEVELT STUDENTS AND TEACHERS SAID

On February 21st, 2018, the LAUSD Office of Environmental Health & Safety (OEHS) hosted a CEQA – Draft EIR PUBLIC MEETING, where dozens of current Roosevelt teachers, students, and alumni affirmed the state of Building 1 was in great disrepair, with reports of vermin infestation going back to 2002, according to teacher Jorge Lopez, and that falling ceiling tiles were the norm, according to teacher Magdalena Ceja, who repeated these comments to KPCC’s Kyle Stokes. Ceja also affirmed the electrical outlets in her classroom were faulty. This is a fire hazard. These testimonies, if true, raise profound questions about LAUSD’s concerns and actions (or lack of actions) with regards to the health and safety of teachers and students going back as far as 2002, if not more.

The Coalition to Preserve LA joins the Boyle Heights community in demanding to know **why Roosevelt’s SARC’s completely contradict these testimonies.**

Here is a screengrab of Roosevelt’s SARC, describing the repair status of “Pest/Vermin Infestation,” “Fire Safety,” and “Interior Surfaces” as GOOD, with an overall rating of EXEMPLARY:

SCHOOL FACILITY GOOD REPAIR STATUS - MOST RECENT YEAR (MONTH AND YEAR IN WHICH DATA WERE COLLECTED: MAY 2015)		
System Inspected	Repair Status	Repair Needed and Action Taken or Planned
Gas Leaks	GOOD	
Mechanical / HVAC	GOOD	
Sewer	GOOD	
Interior Surfaces	GOOD	
Overall Cleanliness	GOOD	
Pest / Vermin Infestation	GOOD	
Electrical (Interior and Exterior)	GOOD	
Restrooms	GOOD	
Sinks / Drinking Fountains (Inside and Outside)	GOOD	
Fire Safety	GOOD	
Hazardous Materials (Interior and Exterior)	GOOD	
Structural Damage	GOOD	
Roofs	GOOD	
Playground / School Grounds	GOOD	
Windows / Doors / Gates / Fences	GOOD	
Overall Rating	EXEMPLARY	

4

<http://search.lausd.net/cgi-bin/fccgi.exe?w3exec=sarc20162017&which=7751>

Relatedly, The Coalition to Preserve LA requests LAUSD immediately make available for public review all Records of maintenance repairs that occurred between 2002-2017.

The Coalition to Preserve LA joins the Boyle Heights community in asking for all records of Prop 98 related funding (from 2002-2017) received by Roosevelt High School.

Manufacturing Stakeholder Non-Participation

Community partnership was non-existent due in part to LAUSD’s opting to use a “Design-Build” strategy, instead of a “Design-Bid-Build” strategy, which would have produced a more transparent process with informed community members contributing to the designing and planning phases. The Coalition to Preserve LA

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urges the school district to open up a new, transparent, inclusive DEIR review process with full presentations (including graphic animations, detailed site plans) for Alternative 2 and other feasible options.

5

The Coalition to Preserve LA requests LAUSD make available to the public R building retrofit plans using less expensive steel materials instead of concrete.

6

Sincerely,
Jorge Castaneda
Community Organizer
Coalition to Preserve LA



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Coalition to Preserve L.A. is a citywide movement of concerned residents who believe in open government, people-oriented planning, equitable housing and environmental stewardship of Los Angeles through advocacy and empowering the community.

Letter No. B6: Coalition to Preserve LA

Jorge Castaneda
Community Organizer
Coalition to Preserve LA

Response B6-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus and a statement in opposition to the Project, due to the historical nature of the campus buildings. Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B6-2

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B6-3

The comment raises concerns regarding potential impacts to historical cultural resources as a result of implementation of the proposed Project.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding historical cultural resources concerns.

Response B6-4

The comment raises concerns regarding the Classroom Instructional Improvement and Accountability Act, the School Accountability Report Card (SARC) posted May 2015, and anecdotal information reported by school staff and students. Further C2PLA has requested all records of Prop 98 related funding (from 2002-2017) received by Roosevelt High School.

It should be noted that the SARC includes a Facility Inspection Tool (FIT) that evaluates the physical condition of a school in a number of categories and determine if they are in “good repair” as defined by Education Code (EC) Section 17002(d)(1). “Good repair” is defined to mean that the facility is maintained in a manner that ensures that it is clean, safe, and functional. The tool is designed to identify areas of a school site that are in need of repair based upon a visual inspection of the site. While the SARC is useful in providing a baseline evaluation of a school’s facility systems and components, it does not go into the high level of detail that was used by LAUSD in its master planning and site analysis process to identify the schools of greatest need and establish the scope of work contemplated for the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response B6-5

The comment raises concerns regarding the public engagement process and community outreach in connection with LAUSD using a design-build strategy for project delivery.

Refer to **Topical Response 2, Precommitment to the Proposed Project**, and **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B6-6

This comment requests a re-design for the Alternative 2 project renovations to Building 1.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

April 6, 2018

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

Dear Mr. Paek:

RE: DEIR Roosevelt High School Comprehensive Modernization Project

The Committee to Defend Roosevelt was formed in December 2017 in response to learning about the Roosevelt High School Comprehensive Modernization Project. We are a grassroots committee of local residents and Roosevelt High alumni who care deeply about Roosevelt High and its students – past, current, and future. LAUSD has an opportunity to preserve and rehabilitate the R building as part of the proposed modernization, and we look forward to finding a way to accomplish this.

1

The Committee to Defend Roosevelt has talked with hundreds of residents in Boyle Heights about the modernization proposed at Roosevelt High and they were alarmed to hear that modernization as proposed by LAUSD meant the demolition of the R Building and other buildings on the historic campus. They were also concerned about other environmental impacts the proposed project will have in our neighborhood.

According to the DEIR, Preservation Alternative 2 meets nine of the sixteen Project Objectives, yet has not been presented in detail to the public. On March 17, 2018, the Committee to Defend Roosevelt hosted a public meeting to discuss the preservation alternatives to the proposed project. LAUSD was invited and shared new information about Alternative 2 that was previously not included in the DEIR. To date, this information has not been available to the general public.

2

On March 21, 2018, the Committee to Defend Roosevelt submitted a request to extend the public comment period for the Roosevelt High School Comprehensive Modernization Project Draft EIR for an additional 45 days to allow the public more time to review and comment on new information LAUSD presented at a meeting we hosted on March 17, 2018. We also requested that LAUSD make any information not previously included in the project DEIR available to the public and that LAUSD host an additional CEQA meeting to inform the public about the Preservation Alternatives under consideration.

While we thank you for providing the Committee to Defend Roosevelt an additional two week extension to submit comments, we are disappointed that the general public was not given more time to learn about, review, and comment on the Roosevelt High Comprehensive Modernization Project DEIR and the new related information.

3

Roosevelt High is an important legacy school in Los Angeles that should be preserved and rehabilitated for current and future students. We are opposed to the proposed project “as is” because it calls for demolition of an important neighborhood asset and an iconic landmark of Los Angeles.

Deferred maintenance should not be the reason why a historic school is demolished. To better understand the maintenance issues at the R Building and other facilities on campus, the Committee to Defend Roosevelt respectfully requests the maintenance logs for 2015-2017 for the entire school, including but not limited to the R-Building, STEM, and the Magnet building.

4

Many of us do not understand the reason behind LAUSD decision to enter into a Design-Build contract for the Roosevelt High Comprehensive Modernization project, given the known controversy over historic and culturally significant resources on campus. This approach does not appear to have the best interest of the students, parents, community and stakeholders in mind and appears to have limited the public's input on the future of Roosevelt High and Boyle Heights.

5

- When was the public notified about the Roosevelt High Comp Mod design-bid contract?
- Was the Boyle Heights Neighborhood Council notified of the Roosevelt High Comp Mod design-bid contract?
- Is there contingency in the contract should the LAUSD approve a preservation alternative for the Roosevelt High Comp Mod project?

We support Preservation Alternative 2 and believe that with additional review and study, this development option can meet most of the project objectives. Retaining and reusing the R Building would help students develop a sense of place and belonging, and will provide students with a better understanding of their surroundings and our shared history.

The 50th anniversary of the East Los Angeles Blowouts brings a renewed sense of pride in our neighborhood. Roosevelt High and Boyle Heights is an important part of this Los Angeles and LAUSD heritage. In addition to retaining and reusing the R Building to meet the current educational program, preserving the R Building will facilitate the preservation of our Roosevelt High memorabilia, plaques, photos, banners, statues, artwork, and trophies that also help tell our neighborhood's history and values. LAUSD can renovate the ticket-booth to sell tickets for tours, during which everything regarding the Annual Commemoration of the 1968 Student Walkouts for Educational Justice can foster student learning. Future events may include watching related films, inviting related guest speakers, reading the 1968 student demands in class or in a public forum or assembly, holding activities, campus tours, and facilitating brown bag discussions on the historical significance of the moment during school when appropriate, and hosting many public community events.

6

The R Building is the heart of the Roosevelt High campus. The R Building is more than just an old building. It is a functioning classroom building. It is also the history of the school and holds nearly 100 years of stories.

Laura Romo, a Roosevelt High alumni, local resident, and member of the Committee to Defend Roosevelt adds, "I graduated in 2014 and to this day, I still take my son on walks to Roosevelt High, just like my dad used to take me and my brothers to play basketball, tennis, soccer, and other sports. I want to see my son going to class in a beautifully restored and modern R Building, where he may also connect and be inspired by our important Roosevelt High and Boyle Heights heritage."

Zulma Melendrez shares: “When I see our historical monument, touch it, walk through it, sit on its entrance concrete steps and finally join the R Building’s presence with the memories of my days at Roosevelt, the feeling is beyond words. This feeling cannot come about from reading about it, seeing a picture and/or sharing its story without the R Building physically standing in front of me. The R Building is a treasure to me, the Boyle Heights community, to the students, past and present, and its physical legacy should continue because it is a reflection of us students, our lives, and events. The R building is our legacy.”

JoAnn Tambara shares: “My family has an over 85 year connection to Roosevelt High School. My dad graduated in 1933, my mom in June of 1941, six months before the bombing of Pearl Harbor (making her class one of the last to graduate from Roosevelt with any Japanese/Japanese-Americans), 2 cousins who graduated in the 50's and my brother (older) and I graduated in the mid 60's. I then taught at Roosevelt for a total of 26 of my 32-1/2 years with LAUSD (my last 14 years in the R bldg), having retired from Roosevelt, then continuing to volunteer there for at least 4 years as a retiree. The R bldg was the main building for the 6 of us and now is the central building and should, in the modernization, become the historical monument. We are all connected to it and to Roosevelt by it.” Once retrofitted and rehabilitated, the R Building can continue to serve the needs of our local students. Creative redesign of the building’s interiors can result in some expanded classroom spaces, including using the basement, fourth floor, or the auditorium for additional classroom space. Any additional classrooms needed as part of the Roosevelt High Comprehensive Modernization project can be added to other areas of the campus. For example, did LAUSD consider adding an additional floor to the cafeteria to provide more classroom space?

6

Adding Multi-level Parking at the Hollenbeck Mathews/Sixth street entrance would ease the parking struggles for the community, and perhaps during off hours or special events, this Multi-level parking could charge a very modest fee to help offset the construction. This multi-level parking could also remedy some of the site circulation and planning issues associated with Alternative 2.

7

During the meeting held on Saturday March 17, 2018, a community member asked if steel rather than concrete reinforcement had been considered for the retrofit of the R Building. Please provide information about the various retrofit and rehabilitation approaches that have been considered by LAUSD. Also, no current comparative cost analyses for the proposed project and Alternative 2 have been presented.

8

We have learned that a Roosevelt High staff member, now retired, was able to acquire cherry blossom trees that were being given out so that those who lost their lives in Japan's 2011 Earthquake/Tsunami could be remembered and memorialized. She gave one to the then Japanese Language teacher at Roosevelt High because the Japanese Language teacher had lost seven family members in this horrific natural disaster, ranging from an infant to her elderly father. What accommodations have been made to preserve this gift to the school, which adds to the school's rich history?

9

Many of us have concerns that the bond monies for the Roosevelt High Comprehensive Modernization did not include an upgrade to the lunch room and cafeteria, with a modern kitchen, perhaps even culinary classes for both students and stakeholders, with additional classrooms on the top.

10

Traffic and Safety Concerns

The proposed entrance on 4th street should be reconsidered to ensure the the safety of our children. Parents dropping off their teens while battling the rush hour traffic during the morning and afternoon is dangerous to the livelihood of all attending Roosevelt High and the surrounding neighbors. We believe the entrance on Mathews should continue to be the main entrance, or an entrance on 6th Street should be further explored.. Further, the DEIR has limited the project study area of traffic impact to five intersections near Roosevelt High. Many students walk to campus from the residential neighborhood beyond Fickett and Fourth Streets. We do not agree that traffic on 4th Street will not be impacted by the proposed new face of Roosevelt High. We respectfully request that a traffic study on the signalized intersection of Fickett and Fourth Streets be commissioned to provide additional analyses about the impact to traffic the proposed project will generate.

11

Sixth Street is the only one of the four surrounding streets which has no activity after 4 pm. The gym is the one building that there is student activity until late on a daily basis because of the athletes who get out of practice, sometimes after dark, and depending on whether their team had a game as well as when we are on Standard Time. The gym is also the venue for dances. This is a major safety issue to have the gym on 6th Street. We have spoken to current Roosevelt High parents and they are not happy about the gym being proposed on the southern end of the campus. Football parents in particular are not happy about the gym being on the opposite side of the campus from Montgomery Field. But nevertheless, it is a major safety issue. It would make more sense for the location of the gym to be closer to the football field and 4th street.

12

Community Outreach

Why did the LAUSD outreach fliers regarding the Roosevelt High School Comprehensive Modernization Project not accurately inform the public that LAUSD proposed demolition of historic and culturally significant buildings, including the R Building, at Roosevelt High? LAUSD’s Modernization Project has been in process for three years. Why are some community members that live across the street from Roosevelt not aware about the Modernization of Roosevelt, nor the demolition of the historical buildings at Roosevelt? And why are most community members not aware of the plans to demolish the R building?

13

RHS Comp Mod DEIR compared to Burroughs Comp Mod Initial Study

We have been reviewing other LAUSD Comprehensive Modernization plans and see different approaches to preservation and modernization. When we reviewed the DEIR report for John Burroughs Middle School in Hancock Park we found three Modernization approaches with maps. All three maps are in color and all three plans include the rehabilitation and renovation of the historical buildings on the Burroughs campus. Furthermore, pictures in color of the historical features, details, of the buildings at Burroughs were included in the report (see “Burroughs Middle School Comprehensive Mod Project, Initial Study”, page 17, 23). Amongst the pictures there is one in particular that we took note of, that of the concrete steps inside one of the buildings. It reminded us of Roosevelt’s R building’s entry Auditorium lobby stairs leading to the second floor where the

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students from the 1968 Chicano Walkouts gathered peacefully and the reason why the R building is a National Register-eligible historic building.

Why was the community of Boyle Heights only presented with one Modernization Plan/map? Burroughs was presented with three plan/maps.

Why does the RHS Modernization Plan not include site plans for the proposed preservation alternatives?

Why does the RHS DEIR report not include any pictures of the features and/or details of any of the buildings in Roosevelt's historic district?

Given the caliber status of the historical buildings at Roosevelt why did LAUSD not include them, not even one, in the Modernization Plan from the beginning in March 2015?

Even after Roosevelt was identified as a National Register-eligible historic district, why was it not treated like a historical campus in the DEIR as outlined on page 6 of the "Los Angeles Unified School District Design Guidelines and treatment Approaches for Historic Schools"?

Why did LAUSD not hire an Architectural Historian as required for a historical campus as outlined on page 8 in the "Los Angeles Unified School District Design Guidelines and Treatment Approaches for Historic Schools"?

Thank you for the opportunity to comment on the DEIR for the Roosevelt High's Comprehensive Modernization Project. We believe LAUSD can reconfigure the design to provide a safe campus, with quality educational facilities that includes the preservation of the R building at Roosevelt High.

Committee to Defend Roosevelt

Vivian Escalante
Rafael Romo
Francisca Romo
Cesar Romo
Laura Romo
Alonso Romo
Alfredo Romo
Zulma Melendrez

14

15

Letter No. B7: Committee to Defend Roosevelt

Committee to Defend Roosevelt

Response B7-1

The comment provides introductory information and states general concerns about the Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-2

The comments states a concern that 'new information' regarding Alternative 2 to the proposed Project was provided at a meeting held on March 17, 2018.

However, contrary to the commenter's assertion, the information provided at the meeting was not new, and was provided to those present at the meeting to expand on and clarify information which had already been provided in the Draft EIR.

Response B7-3

This comment re-states the need for further review time and a preference for Alternative 2, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-4

The comment raises concerns regarding deferred maintenance at the campus, and requests all copies of the maintenance logs for 2015-2017 for the school, including but not limited to Building 1, STEM, and the Magnet building.

The comment does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response B7-5

The comment raises concerns regarding the public engagement process and community outreach in connection with LAUSD using a design-build strategy for project delivery.

Refer to **Topical Response 2, Precommitment to the Proposed Project**, and **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-6

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, along with personal reminiscences of campus life, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-7

This comment recommends the inclusion of a parking structure in the proposed Project.

Parking Standards for LAUSD schools are provided in LAUSD's School Design Guide. All vehicular access and parking would comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to parking:

- Parking Space Requirements
- General Parking Guidelines
- Vehicular Access and Pedestrian Safety

The proposed Project would continue to provide staff parking in accordance with LAUSD standards of 2.25 spaces per high school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County.

Response B7-8

This comment requests a re-design for the Alternative 2 project renovations to Building 1 and requests comparative cost analyses. Refer to Topical Response 1,

According to Section 15002(a) of the CEQA Guidelines, one of the basic purposes of CEQA is to inform governmental decision makers and the public about potential significant environmental effects of proposed activities. CEQA Section 21060.5 defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.” In addition, Section 15131(a) of the CEQA Guidelines specifically excludes economic and/or social effects from being considered significant effects on the environment. Therefore cost analyses need not be included in a CEQA document, however, in the interest of transparency, LAUSD has provided this information, refer to **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**.

Further, as stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Therefore, no further analysis required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-9

The comment raises concerns regarding the recent gift of a ‘Pink Cloud’ tree to the campus to commemorate the loss of Japanese lives during the 2011 earthquake and subsequent tsunami, but does not raise an environmental issue within the meaning of CEQA, and no further response is required. (Refer to Letter No. C38 from Keiko Miya for further information regarding this gift.)

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-10

The comment raises a question about the possibilities for the use of bond funds for campus upgrades outside of those in the proposed Project, and makes suggestions for additional design and programmatic changes, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-11

The comment raises concerns regarding traffic and student safety following the proposed relocation of the main entrance to the school.

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Further, regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds

- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Section 3.6, Traffic and Transportation in the Draft EIR is based on a traffic study performed for the proposed Project by KOA Corporation on December 19, 2017 (included as Appendix 3.6 to the Draft EIR). Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

As the proposed Project would not result in an increase in enrollment, the Project is not expected to create new vehicle trips, and there would be no Project impacts. Under the Future Conditions with Project Construction (2018), the intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant

Response B7-12

The comment raises concerns for student safety due to the location of the proposed new gym, and makes suggestions for additional design and programmatic changes, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-13

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-14

The comment raises concerns regarding the alternatives included in the Draft EIR for Roosevelt High School Comprehensive Modernization Project, versus those analyzed for the John Burroughs Middle School.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed Project which includes those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B7-15

This comment is conclusionary and re-states a preference for Alternative 2, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

EAST LOS ANGELES COLLEGE

MARVIN MARTINEZ, *President*

1301 Avenida Cesar Chavez
Monterey Park, California 91754
323 265 8650



February 20, 2018

Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

It is my pleasure to write this letter in support of our students in Boyle Heights that will eventually enroll at the Roosevelt High School campus.

I would like to convey my full support for the currently proposed Roosevelt High School Comprehensive Modernization Project. Our students deserve state of the art facilities in order to provide them with a first-class education.


It is widely known that school facilities have a profound impact on both our students and educators. With regards to our Boyle Heights students, we can attest to the reality that school facilities undoubtedly affect their learning, behavior, engagement, health, achievement and personal growth. The effects aren't limited to students alone considering that teachers, too, are also affected by school facilities when it comes to staffing, retention, and dedication. Our kids and teachers have lacked 21st century facilities for decades and have had to make do with their instructional spaces but this can no longer be the case as we are eager to see change finally take place in our schools.

Our students and teachers, for decades, have endured learning and teaching in inadequate buildings with substandard plumbing, roofing, electrical systems and poor ventilation. Our learners and educators are urgently in need of adequate facilities and resources which will result from the overall improvements of the modernization project.

We are overjoyed the LAUSD Board of Education has prioritized Roosevelt High School to be renovated by investing \$173 million dollars to provide our students with facilities that support their full potential and promising future. These long awaited improvements stem back to the 1968 walkouts when students spoke out against unequal learning conditions in the Eastside.

We owe it to our persevering students who have waited for campuses like Roosevelt High School to finally be renovated! Our students deserve first-rate facilities and a first-class education. For this countless reasons, we applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony to kick-off what will undoubtedly have a positive impact for our Boyle Heights community and our country for many generations.

Best,


Miguel Dueñas
Associate Dean, Student Services

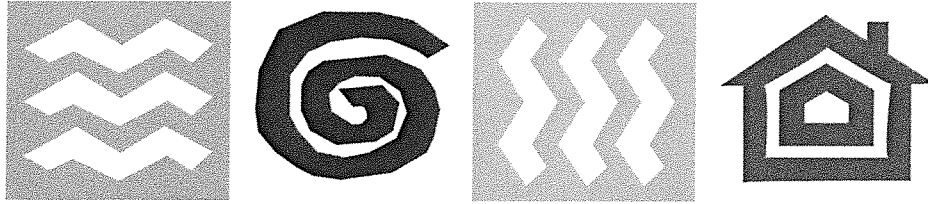
Letter No. B8: **East Los Angeles College**

1301 Avenida Cesar Chavez
Monterey Park, CA 91754

Response B8-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



EAST LA COMMUNITY CORPORATION

2917 E 1st Street, Suite 101 Los Angeles, California 90033

February 16, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Dear Mr. Paek,

East LA Community Corporation is writing to **express our support of the Roosevelt High School (RHS) Comprehensive Modernization Project (Modernization)**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in RHS to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. We would like to underscore the importance of the Modernization project as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizations such as InnerCity Struggle and Promesa Boyle Heights have engaged in the planning of the Modernization project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ernesto Espinoza', with a long horizontal stroke extending to the left.

Ernesto Espinoza
Vice President of Community Capital
East LA Community Corporation

Letter No. B9: **East LA Community Corporation**

2917 E. 1st Street, Suite 101
Los Angeles, CA 90033

Response B9-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



530 SOUTH BOYLE AVENUE
LOS ANGELES, CA 90033

office {323} 780.7605
fax {323} 780.7608

www.innercitystruggle.org

February 21, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

RE: Support for the Roosevelt High School (RHS) Comprehensive Modernization project

To Whom It May Concern,

InnerCity Struggle is writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a comprehensive wellness center, gymnasium, auditorium, lunch shelter, and support spaces. **In light of the 50th anniversary of the East L.A. walkouts, we are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners and community members.

Furthermore, InnerCity Struggle supports the proposed comprehensive modernization project for Roosevelt High School and urges the plan move forward without delays. Roosevelt High School students, staff and faculty deserve modern facilities that meet the needs of today's students to be prepared for college and 21st Century careers.

Sincerely,

Maria Brenes, Executive Director

Letter No. B10: **InnerCity Struggle**

530 South Boyle Avenue
Los Angeles, CA 90033

Response B10-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



February 22, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Andrea Marchetti
Executive Director
(323) 260-8035 x 106
amarchetti@jovenesinc.org

Letter No. B11: **Jovenes**

1208 Pleasant Avenue
Los Angeles, CA 90033

Response B11-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

TAX ID # 26-1607268

MARCIA AARON
CHIEF EXECUTIVE OFFICER

March 20, 2018

Dear Board Members:

It is my pleasure to write this letter in support of our students in Boyle Heights that will eventually enroll at the Roosevelt High School campus.

I would like to convey my full support for the currently proposed Roosevelt High School Comprehensive Modernization Project. Our students deserve state of the art facilities in order to provide them with a first-class education.

It is widely known that school facilities have a profound impact on both our students and educators. With regards to our Boyle Heights students, we can attest to the reality that school facilities undoubtedly affect their learning, behavior, engagement, health, achievement and personal growth. The effects aren't limited to students alone considering that teachers, too, are also affected by school facilities when it comes to staffing, retention, and dedication. Our kids and teachers have lacked 21st century facilities for decades and have had to make do with their instructional spaces but this can no longer be the case as we are eager to see change finally take place in our schools.

Our students and teachers, for decades, have endured learning and teaching in inadequate buildings with substandard plumbing, roofing, electrical systems and poor ventilation. Our learners and educators are urgently in need of adequate facilities and resources which will result from the overall improvements of the modernization project.

We are overjoyed the LAUSD Board of Education has prioritized Roosevelt High School to be renovated by investing \$173 million dollars to provide our students with facilities that support their full potential and promising future. These long awaited improvements stem back to the 1968 walkouts when students spoke out against unequal learning conditions in the Eastside.

We owe it to our persevering students who have tolerantly waited for campuses like Roosevelt High School to finally be renovated! Our students deserve first-rate facilities and a first-class education. For this countless reasons, we applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony to kick-off what will undoubtedly have a positive impact for our Boyle Heights community and our country for many generations.

Respectfully and Moving forward,


Marcia Aaron
KIPP LA Public Schools CEO

Letter No. B12: **KIPP:LA**

3601 East First Street
Los Angeles, CA 90033

Response B12-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

March 20, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Dear Mr. Ed Paek:

We, the undersigned are principals of LA Unified elementary, middle, and high schools in Boyle Heights. **We write to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. As proud principals of the Boyle Heights community, the site of the historic 1968 East L.A. Walkouts, **we are pleased that the call of ‘68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

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We’d like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. **We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.**

Sincerely,



Randy Romero
Hollenbeck Middle School
Administration, Principal

Letter No. B13: **Hollenbeck Middle School**

2510 East Sixth Street
Los Angeles, CA 90023

Response B13-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.


Board of Directors

John Brady, Chair
 Taylor Adams
 Javier Angulo
 Sean Arian
 Joe Argilagos
 Gregory Boyle
 James Burk
 Rosa Campos-Ibarra
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 Rick Creed
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 O'Malley Miller
 J. Mario Molina, MD
 Ashley Palmer
 Viktor Rzeteljski
 Alan Smolinisky
 Rob Smith III
 Elizabeth Stephenson
 Carlos Vasquez
 Chris Weitz

To Whom It May Concern,

I am writing to express my support of the Roosevelt High School (RHS) Comprehensive Modernization project, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

I commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. I am pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized through the Comprehensive Modernization Project.

I'd also like to underscore the importance of the Modernization as it relates to safety and access. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

I commend Los Angeles Unified for its deliberate inclusion of community input in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the Roosevelt High School campus.

I support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

A handwritten signature in black ink that reads "Gregory J. Boyle, S.J."

Fr. Gregory J. Boyle, S.J.
Executive Director

Letter No. B14: Homeboy Industries

130 West Bruno Street
Los Angeles, CA 90012

Response B14-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Community Advisors

Stephen C. Chavez
Elena Popp, Esquire
Ángel Agustín Gorbea
Art Becerra
Liliana T. Pérez
Ché Ruddell-Tabisola

Advisory Board

Ari Gutiérrez-Arambula, MBA*
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Marco Antonio González
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Cesar A. Portillo
Mercedes Márquez

*Founding Board Members

Executive Director
Eddie Martinez

Public Education Director
Juan Castillo Alvarado

Contact Us Here:
Mi Centro LGBTQ en Boyle Heights
553 S. Clarence, Suite 5
Los Angeles, CA 90033
(323) 286-7224
info@LatinoEqualityAlliance.com

www.LatinoEqualityAlliance.com
www.FaceBook.com/LatinoEqualityAlliance
www.Twitter.com/LEA_CA
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Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

February 21, 2018

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,



Eddie Martinez
Executive Director

1

Letter No. B15: Latino Equality Alliance

553 S. Clarence Street, Suite 5
Los Angeles, CA 90033

Response B15-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

EXECUTIVE COMMITTEE

March 20, 2018

Sehila Mota Casper
Houston, TX

Antonia Castañeda, PhD
San Antonio, TX

Sara Delgadillo Cruz
Los Angeles, CA

Laura Dominguez
Los Angeles, CA

Sarah Zenaida Gould, PhD
San Antonio, TX

Yolanda Chávez Leyva, PhD
El Paso, TX

Marta V. Martínez
Providence, RI

Moira Nadal
Washington, D.C.

Leonor Xochitl Pérez, PhD
San Diego, CA

Raymond Rast, PhD
Spokane, WA

Daniel Serda, PhD
Kansas City, MO

Desiree M. Smith
San Francisco, CA

Josephine S. Talamantez
Sacramento, CA

Edward Torrez, AIA
Chicago, IL

Transmitted via email

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net

RE: Draft Environmental Impact Report, Roosevelt High School Comprehensive Modernization Project

Dear Mr. Paek,

On behalf of Latinos in Heritage Conservation (LHC), thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Roosevelt High School Comprehensive Modernization Project. We write to express our deep concern over the proposed demolition and replacement of the campus, which has been identified as historic district for eligible listing in the National Register of Historic Places for its associations with the Chicano Movement.

Few sites representing the histories of communities of color have been designated at the national, state, and local levels, leaving our irreplaceable cultural assets vulnerable to demolition, neglect, inappropriate development, and insensitive public policy. As time passes, preserving places of significance to Latinas/os assumes greater urgency nationwide. The marking this year of the fiftieth anniversary of the East L.A. Blowouts brings renewed importance to the legacy of the landmark event and to the value of the places that help tell that story, including Roosevelt High.

Located at 456 Mathews Street in Boyle Heights, Roosevelt High opened in 1923 and expanded over the decades to encompass an entire city block. The original Auditorium and Classroom Building (Building 1 aka R Building), which received a seismic upgrade and PWA Moderne remodel following the 1933 Long Beach earthquake, continues to anchor the campus, which contains a mix of buildings from subsequent decades.

Roosevelt High, along with four other East L.A. high schools, achieved national attention in March 1968 when Chicano students led a series of organized walkouts and related events known as the East L.A. Blowouts to demand educational equality from the Los Angeles Unified School District (LAUSD). This act of courage and determination served as a catalyst for the Chicano civil rights movement in Los Angeles and beyond, connecting local students to national and international struggles for justice.

SurveyLA, the City of Los Angeles' award-winning comprehensive historic resources survey, identified Roosevelt High as eligible for listing in the National Register in 2014.

LAUSD’s Supplemental Historic Resource Evaluation Report reaffirmed the finding in June 2017. The latter report argues that Building 1/R Building was the center of campus activity during the walkouts and is “an iconic representation of the campus” (16).

As national organizations attest, Roosevelt High belongs to a collection of significant historic sites associated with the 1968 Blowouts. Scholars with the Hispanic Access Foundation, for example, recently identified Lincoln High School as one of ten places associated with Latina/o heritage that warranted recognition and protection (“Place, Story, and Culture,” 2017). The National Park Service’s 2013 *American Latino Theme Study* similarly underscored the centrality of places associated with the Blowouts to the broader history of Latina/o civil rights. Preserving the R Building will provide a deeper understanding of the interrelated histories and experiences of Chicanas/os across East L.A. neighborhoods and the nation at large.

We concur wholeheartedly that students at Roosevelt High School deserve the safest and highest-quality school facilities possible. We do not believe that modernization is fundamentally a choice between historic preservation and new construction. As LAUSD’s own record of rehabilitation at other campuses demonstrates, historic buildings can be upgraded and seismically retrofitted to meet current needs, so that modernization does not happen at the expense of community history. In this case, a viable partial preservation approach could rehabilitate the R Building while integrating sensitive new construction and community amenities into the campus.

The Draft EIR studied four preservation alternatives, including Alternative 2, which would retain and upgrade the R Building as part of a campus-wide modernization. This feasible alternative would preserve an important touchstone of Los Angeles’ Chicana/o history while meeting most of the project objectives. We urge LAUSD, as the lead agency, to select Alternative 2 as its preferred project, paving the way for Roosevelt’s historic fabric to enliven the educational experience of future generations of students.

About Latinos in Heritage Conservation (LHC)

Founded in 2014, LHC is a national organization of professionals, educators, and advocates dedicated to promoting historic preservation in Latina/o communities throughout the United States. We work to ensure Latina/o historic places and stories are part of a more inclusive American narrative and to sustain the living cultural heritage of the country’s diverse Latino communities.

Sincerely,



Laura Dominguez
Co-Chair



Sarah Zenaida Gould, PhD
Co-Chair

cc: Mónica García, LAUSD Board of Education, District 2
Los Angeles Conservancy

1

2

Letter No. B16: Latinos in Heritage Conservation

502 Furr Drive
San Antonio, TX 78201

latinoheritageconservation@gmail.com

Response B16-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus and a statement in opposition to the Project, due to the historical nature of the campus buildings. Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B16-2

The comment provides information about the Latinos in Heritage Conservation (LHC), but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



February 28, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

On behalf of LA Voice, we are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

LA Voice is an interfaith, community organization that unites people from diverse backgrounds to improve the quality of life in their communities. We are a network of 55 congregations, serving thousands of families across the county of Los Angeles. Our congregations are filled with families who sit in LAUSD classrooms everyday and we recognize how their educational experience impacts our communities

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

A handwritten signature in black ink, appearing to read "Zachary Hoover".

Zachary Hoover, Executive Director
LA Voice

Letter No. B17: LA Voice

contact@lavoice.org

Response B17-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



February 19, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Dear Mr. Paek,

On behalf of the youth and families that participate at Legacy LA I am writing to **express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Maria Lou Calanche
Executive Director

Cc: Monica Garcia, School Board President

1

Letter No. B18: **Legacy LA**

Hazard Park Armory
1350 San Pablo Street
Los Angeles, CA 90033

Response B18-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

April 6, 2018

Submitted by email

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

**RE: Roosevelt High School Comprehensive Modernization Project
(Roosevelt Comp Mod) DEIR**

Dear Mr. Paek:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Roosevelt High School Comprehensive Modernization Project. Students deserve the safest, highest-quality school facilities possible. However it is not an either/or choice, as the Conservancy strongly believes Roosevelt High School should be modernized but not at the unnecessary expense of the community’s shared history. As part of much-needed upgrades to facilities, we would like to ensure that eligibility of the Roosevelt High School campus (or a portion thereof, as a partial preservation approach) remains as a historical resource, while minimizing adverse impacts associated with the proposed project.

The Conservancy strongly believes feasible preservation options exist to accomplish this goal. We urge the Los Angeles Unified School District (LAUSD) to set an example for its students of responsible historic and cultural stewardship by adopting a preservation alternative as the preferred project. We greatly appreciate LAUSD’s willingness to work cooperatively with the Conservancy, and we look forward to continued conversations that we hope will result in a preservation-based solution.

As currently proposed, LAUSD will demolish a rare collection of historic and culturally significant buildings, eligible as a National Register historic district for its association with the nationally significant 1968 Chicano Blowouts. Among the buildings proposed for demolition in the Roosevelt Comprehensive Modernization project is Roosevelt High’s centerpiece, its original 1922 Auditorium and Classroom Building (also known as Building 1 and the R Building), a primary contributor to the historic district and an individually eligible historic resource. Additional contributing buildings to be demolished include the Industrial Arts building (1968), Classroom Building 7 (1937), Instrumental Music Building (1959), Classroom Building 17 (1964), Classroom Building 18 (1964), Gymnasium Building (1968), and the Utility Building (1968).

According to the DEIR, the proposed project is designed to address the most critical physical concerns of the buildings and grounds on campus while upgrading,



Letter B19

renovating, modernizing, and reconfiguring the campus to provide facilities that are safe, secure, and better aligned with the current instructional program.

1

The district’s goal to provide a safe and healthy environment that promotes learning is important. Preservation and rehabilitation of historic campus buildings are fully capable of achieving 21st century classroom standards, an approach LAUSD has demonstrated with other historic school facilities.

While we are encouraged by LAUSD’s effort to consider preservation alternatives that retain and upgrade the R Building as part of the Roosevelt High Comprehensive Modernization project, we are concerned that the analyses of the alternatives are not evaluated in great detail. Furthermore, new information about Alternative 2, including a site plan, was only recently presented at a public meeting on March 17, 2018. Such pertinent information is currently not available to the general public.

2

As there will be an unavoidable significant impact to an important collection of historic resources, we urge LAUSD to provide additional information and analyses of Alternative 2, and other potentially feasible alternatives to demolition that could accomplish most of the Roosevelt High Comprehensive Modernization project goals while retaining the R Building.

I. Historical Significance of Roosevelt High School Campus

Located at 456 Mathews Street in Boyle Heights, Roosevelt High School is of national significance for its association with the 1968 student walkouts, known as the “Blowouts,” which were an important early effort in the Chicano Civil Rights movement. Roosevelt High was identified as a National Register-eligible historic district for its association with the Chicano Civil Rights movement by the City of Los Angeles’ SurveyLA in 2014. That finding was reaffirmed by LAUSD’s Supplemental Historic Resource Evaluation Report for the campus in May 2017.

The campus opened in 1923 and expanded over the decades to encompass the entire block bounded by Mathews, Mott, 4th and 6th Streets. The original Auditorium and Classroom Building (Building R), which received a seismic upgrade and PWA Moderne remodel following the 1933 Long Beach earthquake, continues to anchor the campus which contains a mix of buildings from subsequent decades.

Roosevelt High, along with Lincoln, Garfield, Wilson (now El Sereno Middle School), and Belmont High, was thrust into the national spotlight in March 1968 when Chicano students staged the Blowouts to demand educational equality. Last month marks the 50th anniversary of the historical event and presents an opportunity to recognize the important role Chicano students, Los Angeles, and LAUSD’s five schools played in a nationally significant youth led movement for educational reform.

3

The R Building is documented as the primary setting for activities associated with the Blowouts on the Roosevelt campus, including a sit-in that students staged on the lobby stairs and an assembly held by District officials in the auditorium. Historians have detailed the significance of the Walkouts as the first major protest against racial and educational inequality by Chicanos in the U.S., serving as an important catalyst for the Chicano movement in Los Angeles and beyond.

Adding another layer of cultural significance to the R Building are several important campus murals found in its interior, including the “Harvey Milk Day of Service.” As stated in the DEIR, the murals at Roosevelt High are “powerful expressions of the Roosevelt High School student social activism, culture, and community struggles.”¹

¹ Draft EIR, 3.2-20.

Letter B19

3

With few sites representing Latino heritage landmarked on the national state, and local level, protecting known significant Latino heritage resources, such as those associated with the 1968 Blowouts, becomes of urgent concern. Preserving and rehabilitating Roosevelt High’s R Building will build on the efforts of the Latino Heritage Scholars, an initiative of the Hispanic Access Foundation, and others who work to protect, share, and celebrate significant sites related to Latino heritage, including those associated with the Blowouts and Chicano civil rights history.

Given the significance of the site, the Conservancy and others have focused on a preservation alternative that offers a realistic win-win solution and does not call for preservation of the entire eligible historic district. We fully understand the challenges and need to provide some new facilities at Roosevelt High. However, that goal is not mutually exclusive of preservation and reuse, as we strongly believe a more viable plan should be considered, one that successfully includes preservation and new development. For these reasons we are focusing on preservation of only the R Building instead of the entire historic district.

I. Feasible Preservation Alternatives Exist that Avoid or Substantially Lessen Significant Adverse Impacts on Historic Resources

A key policy under CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”² To this end, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”³

Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁴ Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”⁵ The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁶

4

A. Alternative 2: Retention and Renovation of the R Building Would Mitigate the Significant and Unavoidable Environmental Impacts of the Demolition of the Roosevelt Senior High School Historic District

As currently envisioned, the proposed project would demolish the existing contributors to the National Register-eligible historic district, resulting in a significant loss of the historic resource. The DEIR has evaluated three preservation alternatives, all of which would result in the loss of most of the historic district contributors. Alternative 1 is no project and therefore not a bona fide alternative. The Conservancy believes “Alternative 2 – Rehabilitation of Building 1” is the most viable and capable of meeting project goals and objectives. We encourage LAUSD to spend additional time on this alternative to address the identified challenges as part of a good faith effort to allow for a potential win-win outcome. The third alternative would retain the historic district, but would not meet most of the Roosevelt High Comprehensive Modernization project objectives, and is not a meaningful preservation alternative. Alternative 4 is similar to Alternative 2, though it does not make improvements to the R Building.

² Public Resource Code, Sec. 21001 (b), (c).

³ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.

⁴ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1123.

⁵ Public Resource Code, Sec. 21002.1.

⁶ Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.

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According to the DEIR, Alternative 2 meets a majority of the project objectives and can partially meet additional objectives:

- **Objective 3:** While the Building’s existing structural layout would restrict classroom proportions, many classrooms can be still be enlarged to meet California Department of Education educational specifications. In addition, as new concrete shear walls for seismic retrofit are required, care to place these in as many non-classroom spaces within the R Building as possible may reduce blocking existing classroom windows and/or allowing for more viable classroom configurations.
- **Objective 7:** Because the footprint of the R Building is within the academic zone it remains compatible with adjacent academic functions. The gym was sited along the same axis as the academic zone in the proposed project, so retaining the R Building would simply require it be moved further south and would not impede improving the overall functionality and utility of the campus.
- **Objective 11:** Modern and permanent classrooms can be achieved by retrofitting and rehabilitating the R Building. Also, a cost analysis of Alternative 2 is not currently available for public review.
- **Objective 12:** If retrofitted and rehabilitated, the R Building can continue to serve students and the district.
- **Objective 14:** The athletic zone would not be bisected if the R Building is retained as stated in the DEIR. Reconfiguration of the site plan can improve campus access, safety supervision, and circulation.
- **Objective 16:** There is no comparison of project timelines to prove that renovation and construction activities would not occur in a timely manner.

4

In the analysis of Alternative 2, the DEIR states, “The purpose of [Alternative 2] is to renovate Building 1 in a manner that the historic character/character defining features of the building would be retained and renovated following *Secretary of the Interior Standards* and the significant and unavoidable impact associated with loss of the individually eligible resource (Building 1) would be avoided.” This understanding of the Secretary’s Standards is unnecessarily limited, given that Roosevelt High is eligible for listing on the National Register because of its association with an important historical event and historic personage, not for its architecture. Therefore, there may be more leeway in the guidelines to reconfigure the building’s interiors in order to provide more efficient classroom space.

Overall, the DEIR provides only limited details on Alternative 2, as no site plan, seismic study with calculations, or cost analysis is provided. This makes it difficult to understand the particulars of this alternative and why LAUSD believes it cannot meet core project objectives. Based on a request by the Conservancy, in mid-March we did receive a version of the site plan and detailed seismic studies. We are very appreciative to have the new, detailed analysis and thank LAUSD for responding to our request. We also appreciate the meeting that the Conservancy had with LAUSD staff on March 15. Based on the seismic studies and discussion at the meeting, we have a better understanding of the seismic issues and are not convinced that the existing structural system of Building R precludes rehabilitation.

The Conservancy would like to see Roosevelt High School become a 21st century educational facility and believe that Alternative 2 would allow for a project that would honor the rich cultural significance of Roosevelt High, while meeting most of the overall project objectives. As a partial preservation alternative, Alternative 2 would not enable the campus to retain its National Register eligibility as historic district, but it would maintain the individual eligibility of the R Building and provide meaningful mitigation for the other losses associated with the proposed project.

Letter B19

B. Seismic Issues Are Not Insurmountable

The Conservancy has spent considerable time evaluating the seismic analysis that is included within the DEIR, and additional studies that have been provided to us since the release of the DEIR. From the DEIR, seismic studies appear to be limited by “a cursory review of the available construction documents, previous reports and brief observation of each building.”⁷ In addition, the DEIR states that analysis “did not include a detailed comprehensive structural review of existing structures subject to gravity and/or seismic loadings” and “exhaustive structural calculations were not performed as part of this work, nor was computer modeling of the structures.”⁸

To help us better assess and understand the seismic issues, we have also consulted with David Cocke of Structural Focus, an expert in structural engineering, to fully review LAUSD’s analysis. We’ve asked LAUSD the following questions:

- Why does the project exceed the 50 percent threshold of replacements costs, and did that cost include the seismic costs as well?
- Would the scheme change if the existing lateral force resisting elements were counted in the capacity instead of "bypassed"?
- Are the previously added shotcrete shear walls being counted? If not, why?

Through our conversation with LAUSD and the additional structural reports that you provided, we now have a much better understanding of the seismic issues and the method proposed to retrofit the R Building. Thank you for making yourself and consultants available to answer questions and explain in much greater detail. Our conclusion is the same as the DEIR’s, which states the seismic retrofit “could be accomplished while maintaining the historic character of Building 1 and would be completed in accordance with the Secretary of the Interior Standards for the Treatment of Historic Properties.” While we understand this has some implications on classroom configurations, we do not see the seismic retrofit being an insurmountable challenge. This approach can provide for a safe building and maintain the historic eligibility of the R Building, while ensuring a safe building and learning environment.

While there are unique seismic challenges presented at Roosevelt High School, we believe further study of solutions for retrofitting and rehabilitating the R Building could identify approaches that would maximize classroom spaces to meet current needs. The retrofit will require more creativity and sensitivity, especially in the placement of shear walls to maximize the total number of usable classrooms. Preservation architects and engineers have made great strides in addressing seismic concerns. Recent advances in carbon and composite fiber wrap, center coring, and the strategic insertion of shear walls and bracing have allowed our most beloved historic buildings, such as the 1913 Los Angeles County Natural History Museum and the 1911 Huntington Art Gallery, to retain significant historic fabric, adhere to the *Secretary of the Interior’s Standards*, and meet today’s seismic and use requirements. These innovations have been facilitated by the California Historical Building Code, which offers code flexibility to meet the performance requirements of current codes without sacrificing historic integrity. We strongly encourage LAUSD to reconsider this approach and other preservation alternatives, including those that might not strictly adhere to the *Secretary of the Interior’s Standards* but will still maintain eligibility of the R Building.

5

⁷ Roosevelt High School Comprehensive Modernization Project Draft EIR, V.2, 2.0 Existing Site Survey and Investigation, 257.
⁸ *Ibid.*, 259.

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C. Required Classrooms Are Provided

According to the DEIR, the R Building provides 48 classroom spaces, 31 of which are currently in use. Of those in use, twenty are considered too small (less than 800 sq. ft.) by current LAUSD standards. Based on the proposed seismic analysis provided within the DEIR, specifically the DLR study, it estimates a post-retrofitted R Building to provide a total of 21 usable classroom spaces. Based on conversations with LAUSD staff, we understand this falls short of the total needed, by approximately 15 classrooms. However the DEIR itself does not appear to indicate this shortfall or the number of classrooms that will be provided within the proposed new buildings as part of the preferred project. Only a total number of 111 classrooms is indicated, representing an overall reduction in the current count of 132 classrooms.

Our review of the floorplans provided within the DLR study indicates an inefficient layout that could be reconfigured to increase the number of usable classroom spaces, perhaps by as many as 5 additional classrooms. There are numerous spaces indicated as miscellaneous, or deemed too small, yet could be reconfigured so as to better meet the needs. For example, DLR's Second Floor Plan Test Fit indicates a string of continuous miscellaneous spaces totaling 2,920 square feet. The placement of shear walls and interior columns could be addressed to allow for one or two more classroom spaces in this location.

We understand the classroom spaces at Roosevelt High School are deemed inferior by LAUSD due to their rectangular shape and orientation, versus a preferred, square classroom space. However, this is not solely an issue that is inherent to Roosevelt High School, as classroom spaces at other LAUSD historic campuses pose similar challenges. While not ideal it is also not an insurmountable challenge or reason enough to demolish an historic building. Further, Alternative 2 calls for additional, new classroom spaces, in addition to the rehabilitation of the R Building, which will be of the size and shape preferred by LAUSD.

D. Alternative Site Planning and Design Can Address LAUSD Needs

The DEIR does not include detailed site planning analysis for Alternative 2. Only an illustration that indicates buildings to be demolished is provided, as indicated through Figure 4.0-2, "Historic District Contributors and Buildings to be Demolished." Likewise, the same type of limited illustration is provided for Alternatives 3 and 4. We believe this to be inadequate and the reason why we requested LAUSD to provide a site plan that accurately portrays the alternatives as described in the DEIR. In mid-March we received a site plan for Alternative 2.

The Conservancy greatly appreciates LAUSD providing these materials. However, we are concerned that this was not provided to the broad public and the plan we received was inaccurate, as it included a building (Instrumental Music Building) not indicated for preservation as part of Alternative 2 analysis. We understand this was made in error and an updated site plan was provided as part of a Power Point presentation by LAUSD on March 17, 2018. At this meeting LAUSD made available new information, including a site plan, regarding Alternative 2 at a public meeting organized by the Committee to Defend Roosevelt at Hollenbeck Police Station. This new information should be included in the DEIR to inform the public about the proposed project and its preservation alternatives.

Based on conversations with LAUSD and our independent review, we believe site planning and design to be the primary challenge standing in the way of preserving and retaining the R Building as part of Alternative 2. We understand the challenges of wanting to provide a safe and secure campus as well as developing a plan that allows for the desired amenities and future expansion of athletic fields. These are not mutually exclusive from preservation or reason alone to demolish a significant historic and cultural resource. Did LAUSD consider other site planning options, including reducing or relocating tennis and basketball courts elsewhere on site, or additional means to provide the required parking such as a parking

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Letter B19

structure with tennis and basketball courts on the roof? This is a particularly tight site which might require special consideration in order to meet the listed objectives. LAUSD has stated that we don't want to have disparities between school campuses and the types of amenities offered. We fully agree though inherently all LAUSD school campuses are unique, as none are the same and each offers opportunities and challenges when considering a modernization project. We all need to be looking for creative and innovative solutions as there is a disparity when some schools and communities are allowed to retain their historic buildings while others are not.

Further study of the Alternative 2 site plan is necessary and strongly encouraged in this regard to identify opportunities to improve site circulation, while maintaining a safe school environment and freeing up space for needed fire lanes. We intend to do the same and provide LAUSD suggestions for other viable site planning options, though more time is necessary given we only recently received the site plan. This may include demolition or reconfiguration of one or more of 1970s buildings on campus, building a multi-level parking structure, reducing the amount of outdoor basketball or tennis courts, siting some, or all of the outdoor basketball or tennis courts on top of new construction, or adding additional floors to new construction.

7

II. Lead Agency Must Not Pre-Commit to a Project

As included in our November 14, 2017 Notice of Preparation (NOP) comments, we are concerned that LAUSD has proceeded in a manner as to preclude consideration of preservation alternatives, prior to the completion of the required CEQA analysis.

Pre-planning stages for the Roosevelt High School Comprehensive Modernization Project included the Board of Education's approval of pre-design and due diligence activities necessary to define the proposed project in March 2015. This included the completion of a preliminary historic resource evaluation in June 2015 that was flawed and incorrectly identified the campus as not being eligible as a historic resource when in 2014 the campus had been identified as a National Register-eligible historic district through the City of Los Angeles' SurveyLA program.

Following our review of the preliminary historic resource evaluation, the Conservancy provided LAUSD with additional information highlighting the cultural significance of the campus and the need for a thorough historic resource assessment that evaluated the campus based on local, state and national eligibility criteria. As a result, the 2017 cultural resource evaluation (*Draft Supplemental Historic Resource Evaluation Report for Roosevelt Senior High School, Los Angeles, Los Angeles County, California*, ASM Affiliates, May 2017) identified the campus as a National Register-eligible historic district for its associations with the Blowouts and Chicano Civil Rights movement.

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While LAUSD has now commissioned a thoroughly comprehensive evaluation that detailed the cultural significance of Roosevelt High and four other LAUSD campuses associated with the Blowouts, it appears that the planning for the proposed Roosevelt High project, as initially conceived, has continued apace without reconsidering the retention of any identified historic resources. Instead, an Interpretive Plan is included as an appendix to the cultural resource evaluation.

LAUSD's action on August 22, 2017 is also problematic, where the Board of Education authorized the Chief Procurement Officer to enter into a contract (\$144,357,565) with Swinerton Builders and LPA, Inc. for the "Design and Construction of the Roosevelt High School Comprehensive Modernization Project." This action appears to pre-commit LAUSD to a certain outcome prior to the completion of the environmental review process, and consideration of viable preservation alternatives. Has a contract been signed and was any CEQA review or clearance completed for this action? Also, are there contingencies in

Letter B19

place within the contract, should LAUSD pursue a preservation alternative instead? In our meeting with LAUSD on March 15, 2018, when asked about the cost implications of choosing Option 2, it was mentioned that there would be an additional cost if the contract were changed to a preservation alternative. And the cost of the change would be added to the actual cost of construction.

An agency may not pre-commit to a project before CEQA review is completed, because “[a] fundamental purpose of an EIR is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.”⁹ Even though CEQA review has just begun, LAUSD must take care to allow the environmental review process to determine the version of the project that is ultimately certified.

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About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

The Conservancy greatly values working with LAUSD and understands the immense task it has in caring for and being a steward of hundreds of historic school campuses. Our intent is to work collaboratively toward preservation solutions whenever possible, especially in challenging projects like this where there are no easy solutions. We are hopeful that together we can identify a plan for moving forward.

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Thank you for the opportunity to comment on the DEIR for the Roosevelt High School Comprehensive Modernization Project. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

⁹ *Laurel Highlands Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 394.

Letter No. B19: Los Angeles Conservancy

Adrian Scott Fine, Director of Advocacy
523 W 6th Street, Suite 826
Los Angeles, CA 90014

Response B19-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B19-2

The comments states a concern that 'new information' regarding Alternative 2 to the proposed Project was provided at a meeting held on March 17, 2018.

However, contrary to the commenter's assertion, the information provided at the meeting was not new, and was provided to those present at the meeting to expand on and clarify information which had already been provided in the Draft EIR.

Response B19-3

The comment provides a further recitation of information regarding the historic nature of events and buildings on the Roosevelt campus, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B19-4

This comment requests additional analysis and re-design for the Alternative 2 project renovations to Building 1.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination. Further, in a recent case decided by the California Court of Appeal¹⁰, the Court found that there was no legal authority that would require a lead agency to provide architectural drawings of an alternative plan, and the Court declined to make such a requirement.

The commenter stated that they “encourage LAUSD to spend additional time on this alternative to address the identified challenges as part of a good faith effort to allow for a potential win-win outcome.” The District and its consultants have had a lengthy engagement process with the commenter, including several meetings prior to and during the CEQA review process. LAUSD has commissioned additional studies to evaluate and study alternative solutions for retaining Building 1. This additional information validated the District’s initial findings and has been shared with the commenter and the wider community at several public meetings (refer to **Topical Response 3, Community Outreach Regarding the Proposed Project**, for additional information on public outreach.) At this time, LAUSD is continuing to engage with the commenter. Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2**.

Response B19-5

This comment presents opinions regarding the ability of LAUSD to seismically retrofit Building 1 in a manner that would be in accordance with the Secretary of the Interior Standards for the Treatment of Historic Properties. The comment specifically references the Preliminary Tier 1 study which is described on page 257 as “employing the standard methodology outlined in the American Society of Civil Engineers/Structural Engineering Institute (ASCE/SEI) publication, Seismic Evaluation and Retrofit of

¹⁰ *Los Angeles Conservancy v. City of West Hollywood* (2017)18 Cal.App.5th 1031, 1038

Existing Buildings (ASCE 41- 13). This guideline is widely accepted as the standard by which existing buildings are evaluated for determination of potential seismic vulnerabilities. For the purpose of this evaluation, the Tier 1 Initial Screening Phase was used in order to determine potential structural seismic vulnerabilities and if further evaluations (i.e. Tier 2 or 3) are warranted.”

Starting on page 298 of the same document is further evaluation, i.e., the ASCE 41-13 Tier 2 Deficiency-Based Evaluation & Retrofit. The methodology for the Tier 2 Evaluation is described on page 303:

“All of the evaluations and studies were based on existing documents provided by the District, a site walk-through of the building, and structural calculations performed using the guidelines outlined in ASCE 41-13.” The methodology is further described on page 316: “the above deficiencies were determined with a linear dynamic computer model of the building, as well as engineering fundamentals.”

As previously stated, a lead agency need not consider every alternative to a project, nor to analyze it in exhaustive detail. Further, in a recent case decided by the California Court of Appeal¹¹, the Court found that there was no legal authority that would require a lead agency to provide architectural drawings of an alternative plan, and the Court declined to make such a requirement.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

Response B19-6

This comment presents opinions regarding the ability of LAUSD to renovate Building 1 in a manner that would provide an adequate number and configuration of classrooms.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

Response B19-7

The comments states a concern that ‘new information’ regarding Alternative 2 to the proposed Project was provided at a meeting held on March 17, 2018, and that further planning should be undertaken for Alternative 2.

¹¹ *Los Angeles Conservancy v. City of West Hollywood* (2017)18 Cal.App.5th 1031, 1038

However, contrary to the commenter's assertion, the information provided at the meeting was not new, and was provided to those present at the meeting to expand on and clarify information which had already been provided in the Draft EIR.

As previously stated, a lead agency need not consider every alternative to a project, nor to analyze it in exhaustive detail. Further, in a recent case decided by the California Court of Appeal¹², the Court found that there was no legal authority that would require a lead agency to provide architectural drawings of an alternative plan, and the Court declined to make such a requirement.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2**.

Response B19-8

The comment raises concerns regarding the original historical resources evaluations and LAUSD using a design-build strategy for project delivery.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2**, and **Topical Response 2, Precommitment to the Proposed Project**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response B19-9

The comment provides information about the Los Angeles Conservancy, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

¹² *Los Angeles Conservancy v. City of West Hollywood* (2017)18 Cal.App.5th 1031, 1038



20th Street Elementary School • 99th St. Elementary School • 107th Street Elementary School • Carver Middle School • Figueroa Elementary School • Grape Street Elementary School • Griffith Joyner Elementary • Hollenbeck Middle School • Huerta Elementary School • Jordan High School • Markham Middle School • Math, Science & Technology Magnet Academy at Roosevelt • Mendez High School • Ritter Elementary School • Roosevelt Senior High School • Santee Education Complex • Stevenson Middle School • Sunrise Elementary School

Letter B20

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Dear Ed Paek:


On behalf of the Partnership for Los Angeles Schools, we are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized through the Comprehensive Modernization Project.**

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We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. **We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.**

Sincerely,


Joan Sullivan
Chief Executive Officer
Partnership for Los Angeles Schools

Letter No. B20: Partnership of Los Angeles Schools

1055 Wilshire Boulevard, Suite 1850
Los Angeles, CA 90017

Response B20-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

February 27, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Kathi Cervantez
Promesa Boyle Heights
Early Education Program Coordinator

Letter No. B21: Promesa Boyle Heights

135 N. Mission Street
Los Angeles, CA 90033

Response B21-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

27 February 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Cato, K.
IMPACTO Program Director
at Proyecto Pastoral

Letter No. B22: **Proyecto Pastoral**

135 N. Mission Road
Los Angeles, CA 90033

Response B22-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



**PUBLIC HEALTH
ADVOCATES**
EVERYONE HAS THE RIGHT TO BE HEALTHY

February 20, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

I am writing **to express Public Health Advocates' strong support for the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Harold Goldstein, DrPH
Executive Director

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Letter No. B23: Public Health Advocates

P.O. Box 2309
Davis, CA 95617

Response B23-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

March 20, 2018

Los Angeles Unified School Board
333 S. Beaudry Ave., 24th Floor
Los Angeles, CA 90017

Dear Los Angeles Unified School Board:

We, the undersigned are principals of LA Unified elementary, middle, and high schools in Boyle Heights. **We write to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. As proud principals of the Boyle Heights community, the site of the historic 1968 East L.A. Walkouts, **we are pleased that the call of ‘68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We’d like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

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Sincerely,



Ben Gertner
Theodore Roosevelt High School
Administration, Principal

Cc:

LAUSD Facilities
Board Members
InnerCity Struggle
Promesa Boyle Heights

Letter No. B24: Roosevelt High School

456 S Mathews Street
Los Angeles, CA 90033

Response B24-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



SELF HELP
GRAPHICS & ART

February 12, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to safety and access. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its deliberate inclusion of community input in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of- the art facilities that will be constructed on the RHS campus. We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,

Joel Garcia
Co-Director, Programs and Operations
Self Help Graphics & Art
323.881.6444 SHG&A

Letter B25

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Board Members

- Dr. Karen Mary Davalos, *Chair*
- Valarie De La Garza, *Vice Chair*
- Roberta Tinajero-Frankel, *Secretary*
- Endy Bernal
- Dr. Gilberto Cárdenas
- Keri V. Castaneda
- Yvonne Colacion
- Raquel Dominguez
- Paulina M. Flores
- Alfred Fraijo, Jr., Esq.
- Zac Guevara
- Rick Ramirez
- Justin Woodward

Staff

Joel Garcia
Director of Programs & Operations

Betty Avila
Associate Director

Alexa B. Kim
Program Associate / Volunteer Coordinator

1300 East 1st Street
Boyle Heights, CA 90033
323.881.6444
www.selfhelpgraphics.com

Letter No. B25: Self Help Graphics & Art

1300 East 1st Street
Los Angeles, CA 90033

Response B25-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

March 20, 2018

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Dear Mr. Ed Paek:

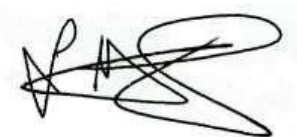
We, the undersigned are principals of LA Unified elementary, middle, and high schools in Boyle Heights. **We write to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. As proud principals of the Boyle Heights community, the site of the historic 1968 East L.A. Walkouts, **we are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. **We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.**

Sincerely,



Leo I. Gonzalez
Robert Louis Stevenson Middle School
Administration, Principal

Letter No. B26: Stevenson Middle School

725 S Indiana Street
Los Angeles, CA 90023

Response B26-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

February 2, 2018

Los Angeles Unified School Board
333 S. Beaudry Ave., 24th Floor
Los Angeles, CA 90017

Los Angeles Conservancy
523 W. 6th Street
Los Angeles, CA 90014

Dear Los Angeles Unified School Board and Los Angeles Conservancy,

We, the undersigned are principals of LA Unified elementary, middle, and high schools in Boyle Heights. **We write to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.

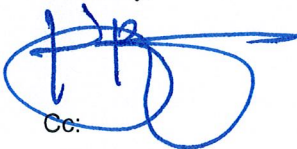
We commend the Board of Education for investing \$137 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. As proud principals of the Boyle Heights community, the site of the historic 1968 East L.A. Walkouts, **we are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,



Cc:

LAUSD Facilities
Board Members
InnerCity Struggle
Promesa Boyle Heights

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Letter No. B27: Sunrise Elementary School

2821 7th Street
Los Angeles, CA 90023

Response B27-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.



Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

It is my pleasure to write this letter on behalf of United Way of Greater Los Angeles in support of our students in Boyle Heights that will eventually enroll at the Roosevelt High School campus.

I would like to convey the organization's full support for the currently proposed Roosevelt High School Comprehensive Modernization Project. Our students deserve state of the art facilities in order to provide them with a first-class education.

It is widely known that school facilities have a profound impact on both our students and educators. With regards to our Boyle Heights students, we can attest to the reality that school facilities undoubtedly affect their learning, behavior, engagement, health, achievement and personal growth. The effects aren't limited to students alone considering that teachers, too, are also affected by school facilities when it comes to staffing, retention, and dedication. Our kids and teachers have lacked 21st century facilities for decades and have had to make do with their instructional spaces but this can no longer be the case as we are eager to see change finally take place in our schools.

Our students and teachers, for decades, have endured learning and teaching in inadequate buildings with substandard plumbing, roofing, electrical systems and poor ventilation. Our learners and educators are urgently in need of adequate facilities and resources which will result from the overall improvements of the modernization project.

We are overjoyed the LAUSD Board of Education has prioritized Roosevelt High School to be renovated by investing \$173 million dollars to provide our students with facilities that support their full potential and promising future. These long awaited improvements stem back to the 1968 walkouts when students spoke out against unequal learning conditions in the Eastside.

We owe it to our persevering students who have tolerantly waited for campuses like Roosevelt High School to finally be renovated! Our students deserve first-rate facilities and a first-class education. For this countless reasons, we applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony to kick-off what will undoubtedly have a positive impact for our Boyle Heights community and our country for many generations.

Respectfully and Moving forward,

Deena Margolis
Vice President, Community Impact

Letter No. B28: United Way of Greater Los Angeles

1150 S Olive Street, Suite 500
Los Angeles, CA 90015

Response B28-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: America Obeno

Affiliation / Afiliación: Proyecto Pastoral at Dolores Mission

Address / Dirección: 135 N. Mission Rd., LA CA 90042

Comment / Comentarios:

Is there a plan to assist w/ conducting traffic during the demolition and construction phase?

What's the timeframe? Will city traffic conductors be assisting? * We are concerned about additional traffic congestion and pedestrian safety concerns along 4th street.

1

Written comments must be received no later than March 23, 2018 at the following address:

Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C1: America Aceues

Proyecto Pastoral at Dolores Mission
135 N. Mission Road
Los Angeles CA 90042

Response C1-1

The comment raises concerns regarding traffic and student safety in the project vicinity during project construction and operation.

Most of the following measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction’s design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

SC-T-4 LAUSD shall require its contractors to submit a construction worksite traffic control plan to the LADOT for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

The proposed Project would also implement the following mitigation measure to help maintain student safety during construction:

MM-PED-1: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD. This requirement shall be included on all construction documents.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Leticia Aguiar

Affiliation / Afiliación:

Address / Dirección: 4438 Blanchard st LA. CA 90022

Comment / Comentarios: Mis hijos estudiaron aqui en Roosevelt uno ya graduo de la Universidad e/otra esta en su segundo año de Universidad, yo estoy de acuerdo en la Remodelacion de Roosevelt, creo que nuestras proximas generaciones se merecen una escuela con nuevos edificios y Tecnología de actualidad. Los felicito y adelante con el proyecto ADELANTE

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LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

EDUCACION
DIGWA PARA
NUESTROS JOVENES.
GRACIAS.

TRANSLATION

Name: Leticia Aguiar

Comment: My children went to school here at Roosevelt. One of them has already graduated from university and the other one is in his second year of university. I am in agreement with the remodeling of Roosevelt. I believe our next generations deserve a school with new buildings and current technology. I congratulate you and onward with the project.

ONWARD DECENT EDUCATION FOR OUR YOUTH. THANK YOU.

Letter No. C2: **Leticia Aguiar**

4438 Blanchard Street
Los Angeles, CA 90022

Response C2-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Ana E. alvarenga

Affiliation / Afiliación: Community Rep. R.H.S.

Address / Dirección: 457 S. Evergreen Ave L.A Ca 90033

Comment / Comentarios:

Apoyo 100%, Hermoso!!! Parece universidad.
o más amplio.
Me gustaría en espacios para los padres
(importante) en oficinas principales o
administración.

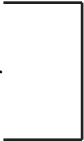
Written comments must be received no later than **March 23, 2018** at the following address:
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333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Ana E. Alvarenga

Affiliation: Community Rep. R.H.S.

Comment: I support [it] 100%, Beautiful!!! It looks like a university. I would like a larger space for parents (important) in the main offices or administration.



Letter No. C3: Ana E. Alvarenga

Community Representative Roosevelt HS
457 S. Evergreen Avenue
Los Angeles, CA 90033

Response C3-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C4

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Vivian Anguiano

Affiliation / Afiliación: Partnership for LA Schools

Address / Dirección:

Comment / Comentarios:

RHS students deserve adequate facilities for 21st Century learning. I urge you to approve this plan in its current form, that includes the demolition of the R-building. The plan as it stands honors the '68 walk outs. This is what RHS

1

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Attn: Edward Paek
CEQA-comments@lausd.net

Students deserve! I urge you not to delay this process.

Letter No. C4: Viviann Anguiano

Partnership for LA Schools

Response C4-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: XAVIER ARAMBULA <arambula@g.ucla.edu> on behalf of Xavier Arambula <x.man@ucla.edu>
Sent: Thursday, March 22, 2018 7:29 PM
To: Paek, Edward
Cc: rsagara@laconservancy.org
Subject: Roosevelt High School - Save R building
Importance: High

I graduated from Roosevelt in 1977 and have very fond memories from my time there. My homeroom was in the R building so first thing every morning I would walk up the main stairs to go to homeroom. I took it for granted then, for the most part, but later I realized that walking up that grand entrance implied you were entering an important place. Walking up a staircase to your future.

The auditorium has a special place in my heart because of one special night. A night where I wasn't even in the audience. That night happened towards the end of my senior year. It was awards time and I had come down with a case of the Chicken Pox so I couldn't attend the awards ceremony. In lieu of my attendance, my younger sister went in my place. She was a freshman at Garfield High at the time, but family is stronger than rivals. Anyway, she went in my place and accepted all my awards for me. I had around seven total. She told me later that it felt like she was at the Academy Awards because every time they called my name, they would say, "...accepting the award for Xavier Arambula is his younger sister..." When she first told me that I couldn't stop from laughing because she added that she got tired having to get up, walk down the aisle, and then go back to her seat because she had to do that SEVEN TIMES! Again, a memory I'll never forget even though I wasn't actually there.

I was a member of the men's varsity tennis team all three years I was at Roosevelt. In my senior year I was awarded the MVP trophy. It was a tradition to commemorate MVP athletes and winning teams in the main hallway on the first floor of the R building. It was a great sense of pride. One that I'll never forget.

The R building is the heart of Roosevelt. It was in 1977 and I'm sure it's the case now. Roosevelt doesn't need a heart transplant. It just needs to be healthy again and improved. The R building should be brought into the 21st century, but also strengthen the connection to its historic past with a well-deserved restoration/renovation.

Lastly, I was first a Roosevelt Rough Rider and now I'm a UCLA Bruin. Interestingly enough, I first started working here shortly after a seismic retro-fit was done to Moore Hall on campus. It's one of the earlier buildings built. Imagine if UCLA had decided not to retro-fit because it was too expensive and instead knock down the building? Moore

Hall is an iconic building that has always housed the school of education. Once you destroy buildings like this, you can never restore its historic stature with a new building no matter how much better it might be functionally. The R building falls into the same category. It needs to be restored and modernized in a sensitive way so that future Rough Riders can also immerse themselves in its history and tradition of educational excellence.

1

Thanks,

Xavier Arambula
Class of 77

Letter No. C5: Xavier Arambula

Arambula@g.ucla.edu

Response C5-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, along with personal reminiscences of campus life, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: roque armenta
Affiliation / Afiliación: COMMUNITY ORGANIZATION - INNER-CITY STRUGGLE
Address / Dirección: 4600 3/4 CATAPUA STREET LOS ANGELES CA 90032
Comment / Comentarios:

THIS PROJECT WILL PROVIDE OUR STUDENTS WITH A
QUALITY EDUCATION. MOVING FORWARD WITH THE PROJECT
IS THE BEST WAY TO HONOR THE 1968 LEGACY. I'D LIKE TO SEE
THIS PROJECT HONOR THE HISTORY BY INCLUDING MURDERS AND
STATUES AS WELL AS OTHER IDEAS TO COMMEMORATE THE
HISTORY OF THE COMMUNITY.

1

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Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
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333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C6: Roque Armenta

Community Organization – InnerCity Struggle
4600 ¾ Catalpa Street
Los Angeles, CA 90032

Response C6-1

The comment includes statements in support of the proposed Project and requests the protection of the campus murals.

The campus murals are powerful expressions of the Roosevelt HS student social activism, culture, and community struggles. The report discusses four exterior murals and one interior mural, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural. In addition, the *El Plan del Pueblo – Boyle Heights*, prepared by the East LA Community Corporation, identifies the *Anahuac* mural, located along the perimeter retaining wall at Mott Street and 6th Street as one of cultural significance and the longest and largest mural in Boyle Heights.¹³

As part of the proposed Project, Building 1, which contains the Harvey Milk Day of Service mural and the portable buildings on which the four exterior murals are painted would all be demolished or removed. While LAUSD does not have a formal mural policy, artists are typically required to complete a license agreement which waives all rights to any mural painted on LAUSD property. In the absence of such a license agreement, the mural would be subject to the California Art Preservation Act, under which LAUSD would be obligated to contact the artist and request a waiver prior to removal. In either case, the murals would be documented and retained in archival records. As recommended by the report, the proposed Project includes areas where new murals can be painted.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

¹³ https://issuu.com/eastlacommunitycorporation/docs/plandelpueblo_english_digitalversio

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Letter C7

Name / Nombre: Maria Brenes

Affiliation / Afiliación: Community partner / LAUSD parent

Address / Dirección: 530 S. Boyle Ave. LA 90033

Comment / Comentarios:
Please move forward with modernization
and work with school community to
develop a historical/cultural heritage plan.

1

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*Envia su comentarios antes de **23 de marzo 2018** a la siguiente dirección:*

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: Edward Paek

CEQA-comments@lausd.net

Letter No. C7: Maria Brenes

Community Partner / LAUSD Parent
530 S. Boyle Avenue
Los Angeles, CA 90033

Response C7-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C8

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Belinda Campos

Affiliation / Afiliación: Public Health Advocates

Address / Dirección: _____

Comment / Comentarios: _____

Public Health Advocates supports the new
buildings of RHS and supports all new changes
that the ~~developer~~ developers have designed w/
community input including hydration stations.

1

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*Envia su comentario antes de **23 de marzo 2018** a la siguiente dirección:*
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C8: Belinda Campos

Public Health Advocates

Response C8-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Lucía Carranza

Affiliation / Afiliación: _____

Address / Dirección: 1271 S Indiana St Los Angeles CA 90023

Comment / Comentarios: _____

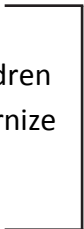
Estoy de acuerdo en que se haga el nuevo
proyecto de la escuela Roosevelt H.S. mis hijas
estudiaron aqui dejaron recor y recuerdos aqui pero
es necesario la modernizacion de la escuela

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LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Lucia Carranza

Comment: I am in agreement with the new Roosevelt H.S. project being done. My children went to school here and they left a record and memories here but it is necessary to modernize the school.



Letter No. C9: Lucia Carranza

1271 S. Indiana Street
Los Angeles, CA 90023

Response C9-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.


COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Carolina Cobro
Affiliation / Afiliación: Promesa Boyle Heights - Community School Coordinator
Address / Dirección: 135 N. Mission Road, LA CA 90033
Comment / Comentarios:

I fully support the modernization the way that it is now. Families, students and community organization have organized and mobilized to ensure this project takes place. We can no longer wait for this project to take place. The Boyle Heights Community deserves a school.

1

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Attn: Edward Paek
CEQA-comments@lausd.net

that meets the needs of students now. They deserve a safe, state of the art facility that will prepared them for 21st century careers.

Letter No. C10: **Carolina Couto**

Promesa Boyle Heights – Community School Coordinator
135 N. Mission Road
Los Angeles, CA 90033

Response C10-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Danilo Cuxil

Affiliation / Afiliación: Estudiante.

Address / Dirección: 3475 Eagle st L.A. C.A. 90063

Comment / Comentarios: En mi opinion me parece un muy buen proyecto. Es algo de mucha importancia en el futuro para que las miles de personas que tengan la oportunidad del aprendizaje en estas instalaciones sea de mucha comodidad.

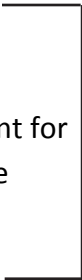
Written comments must be received no later than March 23, 2018 at the following address:
 Envía su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
 LAUSD Office of Environmental Health and Safety
 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
 Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Danilo Cuxil

Affiliation: Student

Comment: In my opinion, I think it is a very good project. It is something very important for the future so that the thousands of people who will have the opportunity to learn in these facilities will do so very comfortably/conveniently.



Letter No. C11: Danilo Cuxil

Student
3475 Eagle Street
Los Angeles, CA 90063

Response C11-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

March 23, 2018

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

Dear Mr. Paek:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Roosevelt High Comprehensive Modernization Project.

Alternative 2 IS THE PREFERRED DEVELOPMENT OPTION FOR THE ROOSEVELT HIGH COMP MOD PROJECT

Committee to Defend Roosevelt has been talking tour our neighbors since February and there is overwhelming support to Retain, rehabilitate and reuse the R-Building – Hundreds of local residents object to demolishing the R Building

We do not understand why LAUSD has NOT been open-minded about repurposing the R-Building as part of the modernization project. Once retrofitted and rehabilitated, the R Building can continue to serve the needs of our local students. Creative redesign of the building's interiors can result in some expanded classroom spaces, including using the auditorium as a classroom lecture hall. Any additional classrooms needed as part of the Roosevelt High Comp Mod project, can be added to other areas of the campus.

And as we all know, the 50th anniversary of the East Los Angeles Blowouts brings a renewed sense of pride in our community. Roosevelt High is why Boyle Heights is linked to these important historical events. In addition to retaining and reusing the R Building to meet the current educational program, preserving the R Building will facilitate the preservation of our Roosevelt's memorabilia, plaques, photos, banners, statues, artwork, and trophies that also help tell our neighborhood's history and values. LAUSD can renovate the ticket-booth to sell tickets for tours, during which everything regarding the Annual Commemoration of the 1968 Student Walkouts for Educational Justice can foster student learning. Future events may include watching related films, inviting related guest speakers, reading the 1968 student demands in class or in a public forum or assembly, holding activities, campus tours, and facilitating brown bag discussions on the historical significance of the moment during school when appropriate, and hosting many public community events.

The students need more, and retaining and reusing the R Building would help them develop a sense of place and belonging, and will support opportunities to learn more about their surroundings and our shared history. We do not support demolishing our important Roosevelt High and Boyle Heights heritage.

1

Since LAUSD challenged that a rehabilitated R-Building would not result in as many classrooms as proposed new construction, has LAUSD considered using the auditorium as classroom space? Lectures in the auditorium may prepare students for a college setting.

2

Adding Multi-level Parking at the Hollenbeck Mathews/Sixth street entrance would ease the parking struggles for the community, and perhaps during off hours or special events, this Multi-level parking could charge a very modest fee to help offset the construction. This multi-level parking could also remedy some of the site circulation and planning issues associated with Alternative 2.

3

There are many Community supporters for Alternative 2:

1. Committee to Defend Roosevelt
2. LA Conservancy
3. Coalition to Preserve LA
4. Latinos in Heritage Conservation
5. Over 500 signatures gathered

4

No line items for Optional Renovation

We have not been presented with any optional renovation alternatives.

During the meeting held on Saturday March 17, 2018, a community member asked if steel rather than concrete reinforcement had been considered for the retrofit of the R Building. Using concrete is more expensive. Were several retrofit and rehabilitation approaches considered?

5

No current comparative cost analyses for the proposed project and Alternative 2 have been presented. We request that we receive the cost analysis for the Design-Build Proposed Project, and for Alternative 2.

Deferred Maintenance

R/1-Building

The question everyone wants to know, how could LAUSD defer maintenance on the R-Building for so many years? In February 2018, I was alarmed to hear of the many maintenance and facility issues regarding the R Building. How can it be possible that Roosevelt High School received a FACILITY GOOD REPAIR STATUS according to the SCHOOL ACCOUNTABILITY REPORT CARD in May 2015? Does this mean students and faculty are lying about the rats that they have names for? Or, the rat feces that is in the classrooms? If this is true, LAUSD has jeopardized the well-being of children and faculty for many years.

6

Deferred maintenance should not be the reason why a historic school should be demolished. To better understand the maintenance issues at the R Building and other facilities on campus, the Committee to Defend Roosevelt respectfully requests the maintenance logs for 2015-2017 for the entire school, including but not limited to the R-Building, STEM, and the Magnet building.

We are interested to know if the Bond money for this Proposed Project would be granted, if deferred maintenance were purposely caused in order to demolish the R-Building?

Objections to Proposed Project:

Design-Build should not have been selected!

On August 22, 2017, LAUSD Board approved a \$144,357,565 contract with Swinerton Builders, who will partner with the architecture firm LPA,, Inc., item 8-Board of Education Report No. 010—17/18 Procurement Services Division Facilities Contracts.

When was the public notified about the Roosevelt High Comp Mod design-bid contract?

Was the Boyle Heights Neighborhood Council notified of the Roosevelt High Comp Mod design-bid contract?

Is there contingency in the contract should the LAUSD approve a preservation alternative for the Roosevelt High Comp Mod project?

7

Many of us are still unsure the reason behind LAUSD agreeing on a Design-Build contact for Roosevelt High, given the known controversy over historic and cultural significant resources on campus. This approach does not appear to have the best interest of the students, parents, community and stakeholders in mind and appears to include a very small select group to provide input on the future of Roosevelt High and Boyle Heights.

In the Draft Environmental Impact Report (DEIR), Alternative 2 meets 9 of the 16 Project Objectives, yet has not been presented in detail to the public.

We the Committee to Defend Roosevelt are requesting the percentage of construction bills, bids, concepts, designs, dates that are in?

Proposed Project Parking

It's perplexing, why would LAUSD ONLY add 8 additional parking spaces?

Parking

REFUSING to consider Multi-Level Parking, which is a constant concern throughout our community of Boyle Heights, and our city, whereas builders, architects and LAUSD show no interest for community safety, or intrusiveness affecting the livelihood of residents who are unable to park in front of their home, as visitors park and block driveways, forcing residents, elders, and parents with children, residents with groceries, to park away from their homes.

8

Current CEQA process lacking in Outreach Conversations

Hundreds of stakeholders, students, business owners that we have spoken to may have heard of the modernization, yet are completely unaware of LAUSD's proposed plans to demolish Roosevelt's historic R-Building. In fact, most of the campus will be demolished and a very new modernization does not reflect the historic character of our neighborhood.. So why are the LAUSD's designers and architects designs NOT reflecting any design with historic value, just boxes and an unsafe tunnel where lockers will be, painted murals which can be painted over, and the plaques being placed?

Our interest in preserving the R Building, a Boyle Heights and Los Angeles landmark, continues to be dismissed by LAUSD design plans. As a long time resident of Boyle Heights, I value the diversity and cultured history throughout our community. I am not clear why the Roosevelt Comp Mod designers did not take the time to do their more historical research to better inform their design...we are not the west side of Los Angeles, we are the East Side, with rich history, and we wish to protect and maintain that history.

9

Object to an Entrance on 4th Street

Many of us agree that placing a new entrance on 4th street is dangerous and will create huge gridlock during morning rush hour yet LAUSD is not wanting to be held accountable for any concerns regarding the safety of all it's students that will be getting dropped off at the proposed entrance, stating that it is an entrance of the campus, but not the gateway drop-off. Explain that to the parents who are rushing to get to work and dropping off their teens, while being challenged by the working class rushing to get to work. How many more students must suffer for the bad choices of a Unified School District that didn't take the time to thoroughly plan for the modernization because of a pending building contract?

10

Has LAUSD considered upgrading the Outdated Administration Building at Mathews?

Many of us are concerned and want to know why the current Administration Building has NOT been considered for modernization and as the MAIN ENTRANCE, which is safer for all students and parents.

An option for a new modernized Administration Building, incorporating the existing Library/Classroom, the admin/classrooms, and the existing west classroom, which have NOT been proposed or considered. LAUSD could have more classrooms, instead of demolishing the R-Building.

11

Has LAUSD considered upgrading the Outdated Cafeteria?

Many of us have concerns that the bond monies for the Roosevelt High School Modernization did not include a better lunch room and cafeteria, with a modern kitchen, perhaps even culinary classes for both students and stakeholders, with additional classrooms on the top.

We'd like to know why our community was excluded when gathering community input for a more functional school campus for better growth for our students?

12

These are my current comments to the content included in the Roosevelt High's Comp Mod project DEIR. However, new information about Alternative 2 was briefly made available to the Committee to Defend Roosevelt on March 17, 2018 at a meeting we hosted. This information should be widely available to the public. This is one of the reasons why the Committee to Defend Roosevelt is asking for a 45-day extension of the public review period. Please consider this request so that we may fully participate in the environmental review process for this very important project. Thank you.

13

Sincerely,
Vivian Escalante
Roosevelt High School Alumni, 1972
Committee to Defend Roosevelt
Vivian_escalante@outlook.com

Letter No. C12: Vivian Escalante

Vivian_escalante@outlook.com

Response C12-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, and a statement in opposition to the Project, and in favor of Alternative 2 due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-2

This comment suggests using the renovated auditorium in Building 1 as additional classroom space, should Alternative 2 be implemented.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding issues concerning what constitutes appropriate instructional spaces for current teaching methods.

Response C12-3

This comment recommends the inclusion of a parking structure in the proposed Project.

Parking Standards for LAUSD schools are provided in LAUSD's School Design Guide. All vehicular access and parking would comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to parking:

- Parking Space Requirements
- General Parking Guidelines
- Vehicular Access and Pedestrian Safety

The proposed Project would continue to provide staff parking in accordance with LAUSD standards of 2.25 spaces per high school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County.

Response C12-4

The comment lists community supporters of Alternative 2 but does not raise an environmental concern within the meaning of CEQA.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-5

This comment requests a re-design for the Alternative 2 project renovations to Building 1 and requests comparative cost analyses.

According to Section 15002(a) of the CEQA Guidelines, one of the basic purposes of CEQA is to inform governmental decision makers and the public about potential significant environmental effects of proposed activities. CEQA Section 21060.5 defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.” In addition, Section 15131(a) of the CEQA Guidelines specifically excludes economic and/or social effects from being considered significant effects on the environment. Therefore cost analyses need not be included in a CEQA document, however, in the interest of transparency, LAUSD has provided this information, refer to **Appendix 10.0-7, Alternative Seismic Analysis and Cost Estimates**.

Further, as stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Therefore, no further analysis required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-6

The comment raises concerns regarding the Classroom Instructional Improvement and Accountability Act, the School Accountability Report Card (SARC) posted May 2015, and anecdotal information reported

by school staff and students. The SARC includes a Facility Inspection Tool (FIT) that evaluates the physical condition of a school in a number of categories and determine if they are in “good repair” as defined by Education Code (EC) Section 17002(d)(1). “Good repair” is defined to mean that the facility is maintained in a manner that ensures that it is clean, safe, and functional. The tool is designed to identify areas of a school site that are in need of repair based upon a visual inspection of the site. While the SARC is useful in providing a baseline evaluation of a school’s facility systems and components, it does not go into the high level of detail that was used by LAUSD in its master planning and site analysis process to identify the schools of greatest need and establish the scope of work contemplated for the proposed Project.

Further the commenter requests all copies of the maintenance logs for 2015-2017 for the school, including but not limited to the R-Building, STEM, and the Magnet building. The commenter alleges that LAUSD intentionally deferred maintenance on school buildings. The comment does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response C12-7

The comment raises concerns regarding the public engagement process and community outreach in connection with LAUSD using a design-build strategy for project delivery. The commenter further requests information regarding what percentage of the contract has been fulfilled.

Refer to **Topical Response 2, Precommitment to the Proposed Project**, and **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-8

The comment raisins concerns reading neighborhood parking.

Parking Standards for LAUSD schools are provided in LAUSD’s School Design Guide. All vehicular access and parking would comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to parking:

- Parking Space Requirements

- General Parking Guidelines
- Vehicular Access and Pedestrian Safety

The proposed Project would continue to provide staff parking in accordance with LAUSD standards of 2.25 spaces per high school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County.

Response C12-9

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-10

The comment raises concerns regarding traffic and student safety following the proposed relocation of the main entrance to the school.

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Further, regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and

sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Section 3.6, Traffic and Transportation in the Draft EIR is based on a traffic study performed for the proposed Project by KOA Corporation on December 19, 2017 (included as Appendix 3.6 to the Draft EIR). Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

As the proposed Project would not result in an increase in enrollment, the Project is not expected to create new vehicle trips, and there would be no Project impacts. Under the Future Conditions with Project Construction (2018), the intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant

Response C12-11

The comment questions why the Administration building was not included in the proposed project.

The proposed Project has been developed under the LAUSD's School Upgrade Program (SUP) to improve student health, safety, and education through the modernization of school facilities. The LAUSD Board of Education (BOE) approved SUP goals and principals are:

- Schools Should be Physically Safe and Secure
- School Building Systems Should be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

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.

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

Project development focused on correcting the most critical issues – failing buildings and / or building systems and buildings deemed through a detailed seismic evaluation to require seismic life-safety upgrades.

It was determined by LAUSD that the Administration building did not meet the above criteria for inclusion in the proposed Project.

Response C12-12

The comment raises a question about the possibilities for the use of bond funds for campus upgrades outside of those in the proposed Project, and makes suggestions for additional design and programmatic changes, but does not raise an environmental issue within the meaning of CEQA, and no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C12-13

The comments states a concern that ‘new information’ regarding Alternative 2 to the proposed Project was provided at a meeting held on March 17, 2018.

However, contrary to the commenter’s assertion, the information provided at the meeting was not new, and was provided to those present at the meeting to expand on and clarify information which had already been provided in the Draft EIR.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (DEIR)
Roosevelt High School Comprehensive Modernization Project
Borrador del Estudio de Impacto Ambiental (DEIR)
Proyecto de Modernización Integral de Preparatoria Roosevelt

Name / Nombre: Jose A. Espinoza

Affiliation / Afiliación: Principal, Math, Science, and Technology Magnet Academy at Roosevelt High School

Address / Dirección: 456 South Mathews Street

Comments /Comentarios: _____

I write to express my full support of the RHS Comprehensive Modernization Project. Our students deserve and need world class facilities to learn and grow as individuals. The changing curricular demands set by Common Core and the Next Generation Science Standards envision learning environments that allow students to explore, make connections, collaborate with their peers and teachers, and to use technology to personalize their learning experience. Current facilities were not designed (e.g. classrooms too small) to support 21st century learning and should be modernized .

I also support the modernization because current facilities are in need of constant repair.

1

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de Marzo, 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek

Email: CEQA-comments@lausd.net
Please include "Roosevelt Comp Mod" in the subject line
Incluya "Roosevelt Comp Mod" en la línea de asunto

Letter No. C13: Jose Espinosa, Principal

Math, Science, and Technology Magnet Academy at Roosevelt High School
456 South Mathews Street
Los Angeles, CA 90033

Response C13-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Letter C14

Name / Nombre: Alissa Ferrayra
Affiliation / Afiliación: Labor Community Strategy Center
Address / Dirección: 3655 Rosalind Place CA 90023
Comment / Comentarios:

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentario antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Public Comment Guide
Creating Solutions

Who are you?

- Who do you represent?
- What is your connection to Roosevelt?
- Why does this Matter to you?

Uplifting the Positive

- What do you like about the project?
- What about the project addresses the needs of the community?

Solution – How can we make it better?

- What recommendations do you have for the project's design?
- How will this make the design stronger?

Who are you?
I'm a senior here at Roosevelt High School. I'm also a community member who's been involved in organizations that help the community. I've been here at Rainboyle heights since 2010.

Uplifting the Positive
I enjoyed the video because it was a great way of showing how the building might look. Seeing lots of windows ^{in the school} ~~so~~ ^{and} ~~so~~ ^{use} ~~so~~ ^{so} many lights is something I'm excited for. As well as a new full sized clinic that I assume will be open to the community.

Solution – How can we make it better?
I however don't feel the students had much say on the design. I found myself debating the renovation of this building too because its importance but I also understand that its in no proper shape for teachers to teach or for students to learn.

I want to see some of what United students has done to get students to get ~~was~~ ^{be} involved. I welcome you to come back and ~~to~~ ^{to} listen to the comments suggestions and answer questions.

1

Letter No. C14: **Alison Ferreyra**

Labor Community Strategy Center
3055 Rosalind Place
Los Angeles, CA 90023

Response C14-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Carlos Figueroa

Affiliation / Afiliación: Estudiante de adultos

Address / Dirección: 2422 WABAS AVE. WA. CA. 90033

Comment / Comentarios:
Mi preocupación es donde los Ban va poner
alos estudiantes de clase de adultos
de ingles ?

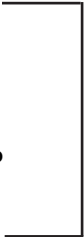
Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la sigüent dirección:
 LAUSD Office of Environmental Health and Safety
 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
 Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Carlos Figueroa

Affiliation: Adult Student

Comment: My concern is, where will you put the students of English classes for adults?



Letter No. C15: Carlos Figueroa

Adult Student
2422 Wabash Avenue
Los Angeles, CA 90033

Response C15-1

The comment raises concerns regarding the location of the Adult Learning Center.

During construction and following the proposed Project, the campus will continue to provide administrative space and shared classrooms for the Boyle Heights Adult Education School. The adult school only functions during evenings or otherwise outside of regular school hours.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Rosa Figueroa

Affiliation / Afiliación: Madre voluntaria

Address / Dirección:

Comment / Comentarios: Tengo un hijo en Roosevelt, aunque mi hijo ya no le va a tocar la nueva escuela yo los apoyo estoy de acuerdo con la Remodelación de la escuela porque nuestros estudiantes se merecen una escuela de calidad sigan Adelante con el proyecto "Que nadie los detenga Adelante"

Written comments must be received no later than March 23, 2018 at the following address: Gracias
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Rosa Figueroa

Affiliation: Parent [Mother] Volunteer

Comment: I have a son at Roosevelt and even though my son will not [use] the new school, I support you. I am in agreement with the school remodeling because our students deserve a quality school. Onward with the project, "Don't let anyone stop you, Onward. Thank you."

1

Letter No. C16: Rosa Figueroa

Parent (Mother) Volunteer

Response C16-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

From: Miguel Flores [<mailto:mflores1818@hotmail.com>]

Sent: Thursday, March 22, 2018 12:14 PM

To: California Environmental Quality Act Comments; Robinson, Dane; Paek, Edward

Subject: Roosevelt High School Project: Extending Public Comment Period to Draft EIR

Dear LAUSD:

On Saturday, March 17, 2018, an oral request was made to extend the public comment period for the Draft EIR to LAUSD staff present at a community meeting regarding the Roosevelt High School Project held at the Hollenbeck Police Station in Boyle Heights. At the forum, several community members expressed concern regarding community outreach and education about the Project.

I repeat my request to LAUSD to extend the public comment period for the Draft EIR for the Roosevelt Project to allow for public participation pursuant to the mandates of CEQA, Public Resources Code Section 21000 et seq.

Also, please send me written notice for all public hearings, and approvals related to the Project to 2000 Pennsylvania Ave, Los Angeles, CA, 90033.

Thank you,
J. Miguel Flores

1

Letter No. C17: **J. Miguel Flores, Esq.**

2000 Pennsylvania Avenue
Los Angeles, CA 90033

Response C17-1

The comment requests the extension of the statutory 45-day comment period on the Draft EIR for the proposed Project.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.

J. Miguel Flores, Esq.
2000 Pennsylvania Ave
Los Angeles, CA 90033
March 23, 2018

Los Angeles Unified School District, Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor,
Los Angeles, CA 90017
ATTN: Mr. Edward Paek, CEQA Project Manager

Re: Theodore Roosevelt High School Project

Dear LAUSD:

I write these comments as an alumnus of Roosevelt High School, Class 94, and as someone who has an interest in preserving the history of Boyle Heights.

The Draft EIR for the Project fails in a number of areas, including, not analyzing a wide range of alternatives, inadequate study of cultural and historic resources, conflicts with local plans, traffic impacts, and health impacts.

The Project requires further study and greater consideration of alternatives, especially those that would preserve the R Building on the campus for future generations of RHS students.

1

I. Process Has Lost Legitimacy as LAUSD Has Pre-Committed Itself to the Project, and all Public Input and CEQA Process is a Sham, a Post Hoc Rationalization for Action Already Taken.

“Because the EIR must be certified or rejected by public officials, it is a document of accountability. If CEQA is scrupulously followed, the public will know the basis on which its responsible officials either approve or reject environmentally significant action, and the public, being duly informed, can respond accordingly to action with which it disagrees.”
Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376.

2

CEQA Guidelines Section 15004(b)(2) states:

(2) To implement the above principles, public agencies shall not undertake actions concerning the proposed public project that would have a significant adverse effect or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance. For example, agencies shall not:

(A) Formally make a decision to proceed with the use of a site for facilities which would require CEQA review, regardless of whether the agency has made any final purchase of the site for these facilities, except that agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance.

(B) Otherwise take any action which gives impetus to a planned or foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.

The Los Angeles Conservancy has noted that LAUSD has already entered into agreements that commits LAUSD to a definite course of action, thereby defeating the whole purpose of CEQA.

In its November 14, 2017, letter to LAUSD, the Los Angeles Conservancy notes:

“LAUSD’s action on August 22, 2017 is also problematic, where the Board of Education authorizes the Chief Procurement Officer to enter into a contract (\$144,357,565) with Swinerton Builders and LPA, Inc. for the “Design and Construction of the Roosevelt High School Comprehensive Modernization Project.”

“This action appears to pre-commit LAUSD to a certain outcome prior to the completion of the environmental review process, and consideration of viable preservation alternatives.” Exhibit 1.

II. LAUSD Has Discouraged Public Participation by Holding A Limited Number of Public Scoping Meetings and Public Hearings.

CEQA Guidelines 15201 states:

“Public participation is an essential part of the CEQA process. Each public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities.”

LAUSD has discouraged public participation by holding only two public hearings in February 2018. At a forum sponsored by the Committee to Defend Roosevelt, held on March 17, 2018, at the Hollenbeck Police Station, LAUSD officials attended and an oral request was made to extend the public comment period on the Draft EIR. The LAUSD

2

3

Officials said they would refer the matter to LAUSD counsel. As of the submittal of this letter, LAUSD has not extended the public comment period.

In a case involving the construction of the Century Freeway in Los Angeles, RHS alumnus, the Hon. Harry Pregerson, wrote about the importance of public deliberation in the planning and construction of public projects.

“While this delay has no doubt inconvenienced the defendants, that inconvenience does not outweigh the public's interest in assuring that the costs and benefits of the Century Freeway project are fully and deliberately considered by the responsible public officials.” *Keith v. Volpe, D.C.* (1972) 352 F.Supp. 1324, 1341.

Judge Pregerson further wrote in the decision regarding the importance of compliance with environmental laws:

“The Court realizes that the delay caused by the preliminary injunction will increase the cost of the Century Freeway if it is ever completed, temporarily inconvenience many individuals, and hinder the planning programs of several of the cities along the route of the freeway. It is necessary, however, to look to the ultimate benefit which hopefully will accrue to everyone living in the Los Angeles area from compliance with our federal and state environmental protection laws. The federal and state highway authorities have not complied; that is why a preliminary injunction is necessary.” *Keith v. Volpe, D.C., supra*, 352 F.Supp. at 1356-1357.

LAUSD has disregarded the environmental laws and process by pre-committing itself to the Project by awarding construction contracts. LAUSD has also not complied with environmental laws by its inadequate environmental review of the proposed RHS project.

III. The Proposed RHS Demolition Project Would Have Significant Aesthetic Impacts

The Draft EIR fails adequately study the impacts on cultural resources, including various murals within several buildings at RHS and around the RHS perimeter walls. The Draft EIR fails to address preservation of these murals.

IV. The Proposed RHS Demolition Project Will Have Significant Land Use Impacts as it is Contrary to the Current Los Angeles City Boyle Heights Community Plan

The Draft EIR fails to adequately analyze the Project's conflicts with the local community plans. The current and proposed Boyle Heights community plans calls for historic preservation of local resources:

The current Boyle Heights plan states:

The physical character of Boyle Heights is low-scale in nature both along the commercial corridors and in the residential community as well.

Issues

- Preserve the existing low scale character of the community.
- Preserve the continuity of the streetscape and enhance community identity

Boyle Heights Community Plan, p. I-9. (Exhibit 2)

Under schools the Boyle Heights Community Plan states:

Policies

Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character and, as appropriate, use schools to create a logical transition and buffer between different uses.

5

Programs

Require that a decision maker involved in a discretionary review for a proposed school, adopt a finding which supports the application of this policy. Boyle Heights Community Plan, p. III-8.

Under Public Facilities, the Boyle Heights Plan states:

Whenever possible, **concepts of intensification, rehabilitation**, reuse and multiple use of facilities and sites should be utilized. Site size standards should be tailored to unique Community conditions, and site expansion. Boyle Heights Community Plan, p. III-7.

The modernistic square shape proposed designs conflict with the community character. The demolition of the R building conflicts with policies of rehabilitation and reuse. Site size standards are not being tailored to the unique Community conditions.

The proposed RHS demolition Project is contrary to the proposed City of Los Angeles, Boyle Heights Community Plan, particularly the policies and goals stated at pages 26 and 27 regarding historic preservation in the neighborhood. Exhibit 3.

V. The Proposed RHS Demolition Project Would Have Significant Impact on Cultural and Historical Resources.

The Draft EIR fails to adequately study the Project's impacts on cultural and historic resources, including but not limited to the contributions of generations of Roosevelt High School former students. The EIR fails to address that RHS is associated with prominent alumni, including but not limited to:

- Leo Buscaglia - writer and professor
- Chris Arreola - professional heavyweight boxer
- Lou Adler – Grammy Award winner and film producer; noted for Rocky Horror Picture Show and Up in Smoke
- Sam Balter – All-American basketball player UCLA; gold medalist in 1936 Summer Olympics; member of SCSBA Hall of Fame
- Paul Bannai – first Japanese-American assemblyman in California
- Lynn Cain – USC running back, played for Atlanta Falcons and Los Angeles Rams
- Phil Carreón (1923–1920), big-band leader who gave Lennie Niehaus his first job as arranger and alto saxophonist
- Gil Cedillo – California state senator
- Willie Davis – MLB outfielder for Los Angeles Dodgers 1960–72; 2-time All-Star and 2-time World Series champion
- Michael Galitzen (Mickey Riley) – 1932 Summer Olympics gold medalist, springboard diving
- Mike Garrett – football player, Heisman Trophy winner for USC 1966; later USC athletic director
- Joe Gold – founder of Gold's Gym
- Frances Hashimoto - former president and CEO of Mikawaya, credited as creator of mochi ice cream and introducing it to American consumer market
- Genaro Hernandez – world junior lightweight champion 1991–1994
- Robert Kinoshita – artist, art director, set and production designer in film and television from 1950s-'80s
- Herbert G. Klein - President Richard Nixon's communications director for executive branch
- Julian Nava - Los Angeles Unified School District Board of Education, U.S. Ambassador to Mexico
- Lennie Niehaus – Emmy Award winner and Clint Eastwood's musical director
- Eugene Obregon – Medal of Honor in Korean War
- **Harry Pregerson – first Jewish American appointed federal circuit judge, 9th Circuit Court of Appeals**

- Myron Prinzmetal - cardiologist
- Ricky Romero – All-City Player of the Year; pitcher for Toronto Blue Jays
- Edward R. Roybal – LA city councilman 1949–62; U.S. House of Representatives 1963–1993
- Andy Russell - born as "Andrés Rábago" in Boyle Heights, Los Angeles, 1940s Mexican-American crooner of hits "Bésame Mucho" and "What a Difference a Day Made"; later an international singing star in Mexico, Latin America, and Spain
- Shirlee Smith - author
- Donald Sterling - former owner of NBA's Los Angeles Clippers
- A. Wallace Tashima – first Japanese-American appointed federal circuit judge, 9th Circuit Court of Appeals
- Bobbi Trout – record-setting aviator of 1930s and 1940s, contemporary of Amelia Earhart and Pancho Barnes
- Antonio Villaraigosa – Mayor of Los Angeles, 2005–13
- Harold M. Williams – Chairman of Securities and Exchange Commission during Carter administration; president emeritus of Getty Center
- Howard Zieff – film director, Private Benjamin, House Calls, My Girl

[https://en.wikipedia.org/wiki/Theodore_Roosevelt_High_School_\(Los_Angeles\)](https://en.wikipedia.org/wiki/Theodore_Roosevelt_High_School_(Los_Angeles)) [Last visited March 21, 2018.]

Attached collectively at Exhibit 4, are various articles, publications, regarding significant contributions of RHS former students.

VI. The Draft EIR fails to adequately study health impacts on students and people working at the new RHS considering the Project is in a hot zone for dangerous diesel particulate matter.

Pursuant to the California Supreme Court's holding in *California Building Industry Association v Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, a public agency must analyze how environmental conditions might adversely affect a school project's users.

“Although CEQA does not generally require an evaluation of the effects of existing hazards on future users of the proposed project, it calls for such an analysis in several specific contexts involving certain airport (§ 21096) and school construction projects (§ 21151.8), and some housing development projects (§§ 21159.21, subds. (f), (h), 21159.22, subds. (a), (b)(3), 21159.23, subd. (a)(2)(A), 21159.24, subd. (a)(1), (3), 21155.1, subd. (a)(4), (6)).” *California Building Industry Association v Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 391; emphasis added.

Public Resources Code § 21151.8: states:

- (a) An environmental impact report shall not be certified or a negative declaration shall not be approved for a project involving the purchase of a schoolsite or the construction of a new elementary or secondary school by a school district unless all of the following occur:
- (1) The environmental impact report or negative declaration includes information that is needed to determine if the property proposed to be purchased, or to be constructed upon, is any of the following:
- (A) The site of a current or former hazardous waste disposal site or solid waste disposal site and, if so, whether the wastes have been removed.
- (B) A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code.
- (C) A site that contains one or more pipelines, situated underground or aboveground, that carries hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood, or other nearby schools.
- (D) A site that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor.
- (2) (A) The school district, as the lead agency, in preparing the environmental impact report or negative declaration has notified in writing and consulted with the administering agency in which the proposed schoolsite is located, pursuant to Section 2735.3 of Title 19 of the California Code of Regulations, and with any air pollution control district or air quality management district having jurisdiction in the area, to identify both permitted and nonpermitted facilities within that district's authority, including, but not limited to, freeways and busy traffic corridors, large agricultural operations, and railyards, within one-fourth of a mile of the proposed schoolsite, that might reasonably be anticipated to emit hazardous emissions or handle hazardous or extremely hazardous substances or waste. The notification by the school district, as the lead agency, shall include a list of the locations for which information is sought.
- (B) Each administering agency, air pollution control district, or air quality management district receiving written notification from a lead agency to identify facilities pursuant to subparagraph (A) shall provide the requested information and provide a written response to the lead agency within 30 days of receiving the notification. The environmental impact report or negative declaration shall be conclusively presumed to comply with subparagraph (A) as to the area of responsibility of an agency that does not respond within 30 days.
- (C) If the school district, as a lead agency, has carried out the consultation required by subparagraph (A), the environmental impact report or the negative declaration shall be conclusively presumed to comply with subparagraph (A), notwithstanding any failure of the consultation to identify an existing facility or other pollution source specified in subparagraph (A).

(3) The governing board of the school district makes one of the following written findings:

(A) Consultation identified no facilities of this type or other significant pollution sources specified in paragraph (2).

(B) The facilities or other pollution sources specified in paragraph (2) exist, but one of the following conditions applies:

(i) The health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school.

(ii) Corrective measures required under an existing order by another agency having jurisdiction over the facilities or other pollution sources will, before the school is occupied, result in the mitigation of all chronic or accidental hazardous air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If the governing board makes a finding pursuant to this clause, it shall also make a subsequent finding, prior to occupancy of the school, that the emissions have been so mitigated.

(iii) For a schoolsite with a boundary that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, the governing board of the school district determines, through analysis pursuant to paragraph (2) of subdivision (b) of Section 44360 of the Health and Safety Code, based on appropriate air dispersion modeling, and after considering any potential mitigation measures, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.

(C) The facilities or other pollution sources specified in paragraph (2) exist, but conditions in clause (i), (ii), or (iii) of subparagraph (B) cannot be met, and the school district is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements in subdivision (a) of Section 17213 of the Education Code. If the governing board makes this finding, the governing board shall adopt a statement of overriding considerations pursuant to Section 15093 of Title 14 of the California Code of Regulations.

(b) As used in this section, the following definitions shall apply:

(1) "Hazardous substance" means any substance defined in Section 25316 of the Health and Safety Code.

(2) "Extremely hazardous substances" means an extremely hazardous substance as defined pursuant to paragraph (2) of subdivision (g) of Section 25532 of the Health and Safety Code.

(3) "Hazardous waste" means any waste defined in Section 25117 of the Health and Safety Code.

(4) "Hazardous waste disposal site" means any site defined in Section 25114 of the Health and Safety Code.

(5) "Hazardous air emissions" means emissions into the ambient air of air contaminants that have been identified as a toxic air contaminant by the State Air Resources Board or by the air pollution control officer for the jurisdiction in which the project is located. As determined by the air pollution control officer, hazardous air emissions also means emissions into the ambient air from any substances identified in subdivisions (a) to (f), inclusive, of Section 44321 of the Health and Safety Code.

(6) "Administering agency" means an agency authorized pursuant to Section 25502 of the Health and Safety Code to implement and enforce Chapter 6.95 (commencing with Section 25500) of Division 20 of the Health and Safety Code.

(7) "Handle" means handle as defined in Article 1 (commencing with Section 25500) of Chapter 6.95 of Division 20 of the Health and Safety Code.

(8) "Facilities" means any source with a potential to use, generate, emit, or discharge hazardous air pollutants, including, but not limited to, pollutants that meet the definition of a hazardous substance, and whose process or operation is identified as an emission source pursuant to the most recent list of source categories published by the California Air Resources Board.

(9) "Freeway or other busy traffic corridors" means those roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area, as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

(Amended by Stats. 2008, Ch. 148, Sec. 2. Effective January 1, 2009.)

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Because LAUSD is essentially building a new school, LAUSD must conduct a health assessment to study air quality impacts on students attending the new RHS. It is well known that Boyle Heights is at the center of the City's major freeway arteries. Exhibits 2, 3, 5.

Education Code Section 17213 provides protections for students from schools being built near hazardous freeways and provides that school districts must make certain findings in school construction projects:

The governing board of a school district may not approve a project involving the acquisition of a schoolsite by a school district, unless all of the following occur:

(a) The school district, as the lead agency, as defined in Section 21067 of the Public Resources Code, determines that the property purchased or to be built upon is not any of the following:

(1) The site of a current or former hazardous waste disposal site or solid waste disposal site, unless if the site was a former solid waste disposal site, the governing board of the school district concludes that the wastes have been removed.

(2) A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for

removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code.

(3) A site that contains one or more pipelines, situated underground or aboveground, that carries hazardous substances, extremely hazardous substances, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood.

(b) The school district, as the lead agency, as defined in Section 21067 of the Public Resources Code, in preparing the environmental impact report or negative declaration has consulted with the administering agency in which the proposed schoolsite is located, pursuant to Section 2735.3 of Title 19 of the California Code of Regulations, and with any air pollution control district or air quality management district having jurisdiction in the area, to identify both permitted and nonpermitted facilities within that district's authority, including, but not limited to, freeways and other busy traffic corridors, large agricultural operations, and railyards, within one-fourth of a mile of the proposed schoolsite, that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste. The school district, as the lead agency, shall include a list of the locations for which information is sought.

(c) The governing board of the school district makes one of the following written findings:

(1) Consultation identified none of the facilities or significant pollution sources specified in subdivision (b).

(2) The facilities or other pollution sources specified in subdivision (b) exist, but one of the following conditions applies:

(A) The health risks from the facilities or other pollution sources do not and will not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.

(B) The governing board finds that corrective measures required under an existing order by another governmental entity that has jurisdiction over the facilities or other pollution sources will, before the school is occupied, result in the mitigation of all chronic or accidental hazardous air emissions to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school. If the governing board makes this finding, the governing board shall also make a subsequent finding, prior to the occupancy of the school, that the emissions have been mitigated to these levels.

(C) For a schoolsite with a boundary that is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, the governing board of the school district determines, through analysis pursuant to paragraph (2) of subdivision (b) of Section 44360 of the Health and Safety Code, based on appropriate air dispersion modeling, and after considering any potential mitigation measures, that the air quality at the proposed site is such that neither short-term nor long-term exposure poses significant health risks to pupils.

(D) The governing board finds that neither of the conditions set forth in subparagraph (B) or (C) can be met, and the school district is unable to locate an alternative site that is suitable due to a severe shortage of sites that meet the requirements in subdivision (a) of Section 17213. If the governing board makes this finding, the governing board shall adopt a statement of

Overriding Considerations pursuant to Section 15093 of Title 14 of the California Code of Regulations.

(d) As used in this section:

(1) "Hazardous air emissions" means emissions into the ambient air of air contaminants that have been identified as a toxic air contaminant by the State Air Resources Board or by the air pollution control officer for the jurisdiction in which the project is located. As determined by the air pollution control officer, hazardous air emissions also means emissions into the ambient air from any substance identified in subdivisions (a) to (f), inclusive, of Section 44321 of the Health and Safety Code.

(2) "Hazardous substance" means any substance defined in Section 25316 of the Health and Safety Code.

(3) "Extremely hazardous substances" means any material defined pursuant to paragraph (2) of subdivision (g) of Section 25532 of the Health and Safety Code.

(4) "Hazardous waste" means any waste defined in Section 25117 of the Health and Safety Code.

(5) "Hazardous waste disposal site" means any site defined in Section 25114 of the Health and Safety Code.

(6) "Administering agency" means any agency designated pursuant to Section 25502 of the Health and Safety Code.

(7) "Handle" means handle as defined in Article 1 (commencing with Section 25500) of Chapter 6.95 of Division 20 of the Health and Safety Code.

(8) "Facilities" means any source with a potential to use, generate, emit or discharge hazardous air pollutants, including, but not limited to, pollutants that meet the definition of a hazardous substance, and whose process or operation is identified as an emission source pursuant to the most recent list of source categories published by the State Air Resources Board.

(9) "Freeway or other busy traffic corridors" means those roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

(Amended by Stats. 2007, Ch. 130, Sec. 54. Effective January 1, 2008.)

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Judge Pregerson also observed of Los Angeles air pollution:

“Air pollution,’ the Supreme Court recently observed, ‘is, of course, one of the most notorious types of public nuisance in modern experience.’ *Washington v. General Motors Corp.*, 406 U.S. 109, 92 S.Ct. 1396, 1398, 31 L.Ed.2d 727 (1972). **Air pollution in the Los Angeles basin is particularly obnoxious, and the major cause of it is**

automobile emission.” *Keith v. Volpe, D.C., supra*, 352 F.Supp. at 1334; emphasis added.

Attached hereto at Exhibit 5 are various materials regarding high levels of diesel particulate matter in Boyle Heights due to the Freeway traffic. Some schools in Boyle Heights have additional filters to protect students from harmful emissions.

The Draft EIR must explore the use of additional mitigation to protect students from diesel particulate matter, including increased use of air filters, and other advanced air cleaning technologies.

VII. The Draft EIR Fails to Adequately Analyze Traffic Impacts and Pedestrian Safety.

The Draft EIR for the Project fails to adequately analyze student safety on Fourth Street due to the Project’s proposed configuration of moving the RHS main entrance to Fourth Street from Matthews Street.

Fourth Street has become a major corridor for traffic commuting to Downtown Los Angeles. Commuters exit the Five Freeway before the East LA interchange, and use Fourth Street to travel to Downtown. In addition, because of the 6th Street Bridge demolition and proposed reconstruction, traffic that once travelled on 6th Street has moved to Fourth Street.

Moving the new RHS entrance to Fourth Street will create a bottle neck on Fourth Street at Mathews Street, just before the major intersection with Soto Street.

The Draft EIR must also study cumulative traffic impacts of proposed new development in the area, including the redevelopment of the Sears Property on Olympic Blvd. and Soto Street, 6th Street Bridge Replacement, other construction of high density housing, particularly on METRO properties.

VIII. The Draft EIR Fails to Consider a Range of Alternatives.

“A major function of an EIR ‘is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.’ [Citation.]” *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 735; see Pub. Resources Code, § 21002.1(a) [purpose of EIR includes identifying alternatives to the project].) The Guidelines explain that the EIR “shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project.

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Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.” Guidelines, § 15126.6(a). “A potential alternative should not be excluded from consideration merely because it ‘would impede to some degree the attainment of the project objectives, or would be more costly.’” *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1354, quoting Guidelines, § 15126.6(b).

Even as to alternatives that are rejected, however, the “EIR must explain why each suggested alternative either does not satisfy the goals of the proposed project, does not offer substantial environmental advantages, or cannot be accomplished.” *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, *supra*, 27 Cal.App.4th at p. 737; see Guidelines, § 15091 (c) [when an agency finds that alternatives are infeasible, it must “describe the specific reasons for rejecting” the alternatives].) The explanation must be sufficient to enable meaningful public participation and criticism. *Stand Tall on Principles v. Shasta Union High Sch. Dist.* (1991) 235 Cal.App.3d 772, 786.

Although the level of detail will vary depending upon an alternative's potential for feasibility, in every case, the EIR must disclose “the ‘analytic route the ... agency traveled from evidence to action.’ [Citation.]” *Laurel Heights*, *supra*, 47 Cal.3d at p. 404. And the lead agency itself must travel that analytic route: It “must independently participate, review, analyze and discuss the alternative in good faith.” *Kings County*, *supra*, 221 Cal.App.3d at p. 736. The agency may not simply accept at face value the project proponent's assertion's regarding feasibility. *Sierra Club v. County of Napa*, *supra*, 121 Cal.App.4th at p. 1504.

The R Building is a historical resource that should be preserved for future generations. It represents the collective experience of all RHS students across 100 years. Each generation facing its unique challenges has stepped up to meet those challenges and has left their footprint on the R Building’s halls and classrooms.

The Draft EIR fails to consider alternatives such as demolishing the existing Administration Building, as LAUSD indicates he will build a new administration building as part of the proposed Project. The current classrooms in the current Administration Building on the Mathews Street side have been substandard and out of date for decades. The building itself lacks any architectural significance.

The Draft EIR also fails to consider alternatives that would replace the current cafeteria building and single-story classrooms that are adjacent to the cafeteria building. Again, these structures can be replaced with a multi-story classroom and cafeteria building. Such a building exists across the street at Hollenbeck Middle School.

IX. The Intensification of Use of the RHS Campus is Questionable Considering Declining LAUSD Enrollment.

Current LAUSD statistics demonstrate decreased enrollment in LAUSD schools. Exhibit 6. These decrease in enrollment can be attributed to greater school choice alternatives such as charter schools and declining populations due to displacements from high rents, gentrification and other social trends. Considering these down trends in enrollment it is highly questionable that the R building needs to be demolished for more intensified use of the campus.

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X. LAUSD Should Consider Alternatives that Preserve Completely or in Part the R Building at RHS.

Because of its historical significance, I petition the LAUSD Board to consider alternatives that preserve the R Building or any portions for future generations.

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Sincerely,



J. Miguel Flores, Esq.

Attachments: Exhibits 1 through 6 (336 Pages)

Letter No. C18: **J. Miguel Flores, Esq.**

2000 Pennsylvania Avenue
Los Angeles, CA 90033

Response C18-1

The comment provides general introductory statements and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C18-2

The comment raises concerns in connection with LAUSD using a design-build strategy for project delivery. Note: Exhibit 1 incorporated as part of this comment is included as **Appendix 10.0-15** of this Final EIR.

Refer to **Topical Response 2, Precommitment to the Proposed Project.**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C18-3

The comment raises concerns regarding the public engagement process and community outreach and the public review period for the Draft EIR.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.

Refer also to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C18-4

The comment raises concerns regarding aesthetics and the various murals that currently exist on campus buildings.

Culturally important elements and spaces on the Roosevelt HS campus are extensively discussed in the *Theodore Roosevelt Senior High School Cultural Analysis* prepared by PCR (now ESA) in February 2017 and included in the technical appendices of the Draft EIR. The memorandum provides background, physical descriptions, and recommendations for features such as the Lindbergh Fountain, class tiles, Japanese Garden, central quad and gazebo, benches, and murals.

With regard to the Lindbergh Fountain and the Japanese garden, these elements would be relocated, but retained as part of the proposed Project. As recommended in the report, the Fountain would be restored to its historical appearance to the extent feasible. The Japanese Garden would be relocated to an area of the campus that is easily accessible to students. Existing landscaping features, such as mature plantings, monuments, and other elements would be relocated and reused to the extent feasible. There is archival information and historical photographs housed in the Japanese American National Museum archives and an excellent publication about Japanese gardens published by the NPS Manzanar National Historic Site, which could be consulted during a redevelopment plan to gather design concepts for a new garden. Complete documentation of both features, including drawings, photographs, and other documentation would be kept as archival records and/or for display within a school building. The campus murals are powerful expressions of the Roosevelt HS student social activism, culture, and community struggles. The report discusses four exterior murals and one interior mural, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural. In addition, the *El Plan del Pueblo – Boyle Heights*, prepared by the East LA Community Corporation, identifies the *Anahuac* mural, located along the perimeter retaining wall at Mott Street and 6th Street as one of cultural significance and the longest and largest mural in Boyle Heights.¹⁴

As part of the proposed Project, Building 1, which contains the Harvey Milk Day of Service mural and the portable buildings on which the four exterior murals are painted would all be demolished or removed. While LAUSD does not have a formal mural policy, artists are typically required to complete a license agreement which waives all rights to any mural painted on LAUSD property. In the absence of such a license agreement, the mural would be subject to the California Art Preservation Act, under which LAUSD would be obligated to contact the artist and request a waiver prior to removal. In either case, the

¹⁴ https://issuu.com/eastlacommunitycorporation/docs/plandelpueblo_english_digitalversio

murals would be documented and retained in archival records. As recommended by the report, the proposed Project includes areas where new murals can be painted.

Response C18-5

The comment raises concerns regarding land use issues and conflicts with the Boyle Heights Community Plan, a component of the land use element of the General Plan of the City of Los Angeles.

The City of Los Angeles General Plan land use designation for the Project site is “Public Facilities.” The proposed Project would be consistent with the existing zoning for the site. The Project does not require a General Plan Amendment or other change in land use designation. As such, the proposed Project would not conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the Project.

Note: Exhibit 2 incorporated as part of this comment is included as **Appendix 10.0-16** of this Final EIR and Exhibit 3 incorporated as part of this comment is included as **Appendix 10.0-17** of this Final EIR.

Response C18-6

The comment provides a listing of prominent alumni, and a statement in opposition to the Project. Note: Exhibit 4 incorporated as part of this comment is included as **Appendix 10.0-18** of this Final EIR.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C18-7

The comment raises concerns regarding air quality and potential health risks at the school site, stating that as “LAUSD is essentially building a new school, LAUSD must conduct a health assessment to study air quality impacts on students attending the new Roosevelt HS.” Note: Exhibits 2, 3 and 5 incorporated as part of this comment are included as **Appendix 10.0-16**, **Appendix 10.0-17** and **Appendix 10.0-19**, respectively, of this Final EIR.

Contrary to the commenter’s assertion, the Project site has been functioning as a LAUSD school site since 1922, and thus the Modernization project is not a ‘new’ school. The Public Resources Code sections cited are relevant to siting and building a new school, not renovating an existing school.

Further, potential air quality impacts of the proposed Project were analyzed in **Section 3.1, Air Quality**, in the Draft EIR. The section analyzes the potential air quality impacts, both temporary (i.e., construction) and long-term (i.e., operational), from the implementation of the proposed Project.

The Draft EIR acknowledges that during construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. However, due to the limited scale and phasing of construction, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Additionally, the localized construction impacts summarized in **Table 3.1-5** reflect work done by the SCAQMD to provide conservative screening levels for potential health impacts for sensitive receptors near proposed Projects. That is, the thresholds shown in **Table 3.1-5** are considered by the SCAQMD to be minimum levels at which it is possible health impacts might occur given worst-case conditions for receptors within 25 meters of a project with a maximum of 5 acres graded per day. Emissions below those levels would not cause impacts to sensitive receptors, including students, even in worst-case conditions. Compliance with SCAQMD Rule 403 and implementation of LAUSD Standard Conditions of Approval would ensure that the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction, impacts would be less than significant, and no mitigation is required.

As discussed in **Section 3.1, Air Quality** in the Draft EIR, the surrounding land uses are primarily residential and commercial, which provide no substantial sources of toxic air contaminants. Consequently, operation of the proposed Project would not cause sensitive receptors, including students, faculty, and staff, to be exposed to substantial pollutant concentrations. Therefore, impacts would be less than significant, and no mitigation is required.

Response C18-8

The comment raises concerns regarding traffic and student safety following the proposed relocation of the main entrance to the school.

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Further, regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: The Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This Guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls,

crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian stud, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Response C18-9

The comment raises concerns regarding cumulative traffic in the Project area.

Section 3.6, Traffic and Transportation in the Draft EIR is based on a traffic study performed for the proposed Project by KOA Corporation on December 19, 2017 (included as Appendix 3.6 to the Draft EIR). Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

As the proposed Project would not result in an increase in enrollment, the Project is not expected to create new vehicle trips, and there would be no Project impacts.

Project level cumulative impacts were analyzed in the Future (2018) with Project scenario. This scenario includes the Project and Related Projects (a total of 24 projects, as listed in Table 3.0-1) and represents the most intense period of traffic generation. As shown in the analysis, the Project would not result in any project level impacts nor would the Project contribute to a cumulative impact at any of the studies intersections. Therefore, cumulative level impacts would be less than significant.

Response C18-10

The comment states that LAUSD failed to consider a range of alternatives.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed Project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

Response C18-11

The comment raises issues related to the ‘intensification’ of uses on the Project site, as related to current enrollment trends in the LAUSD, but does not raise an environmental concern within the meaning of CEQA. Note: Exhibit 6 incorporated as part of this comment is included as **Appendix 10.0-20** of this Final EIR.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C18-12

The comment makes a request that the Board consider a preservation alternative to the Project. Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

GODEK, GWENN

From: Fonseca-Ledezma, Jenesis <fonseca@g.harvard.edu>
Sent: Friday, March 23, 2018 10:16 AM
To: California Environmental Quality Act Comments
Cc: rsagara@laconservancy.org
Subject: RHS Comp Mod

Yes to Alternative 2

Dear Edward Paek and LAUSD,

I am writing to voice my interest in the preservation of the administration/auditorium building (currently known as the "R" building; formerly known, prior to the 70's, as the "A" building).

As a Roosevelt High School alumna, I can attest to the value that lies in knowing the rich and complex history of our campus, from its Japanese-American to Mexican-American roots, and more.

Restoring this building would contribute to the preservation of that history, particularly as it pertains to the East Los Angeles Walkouts. These walkouts served to draw attention to the unequal conditions in LAUSD high schools. Demolishing this building would symbolically destroy the efforts of Roosevelt High School alumni who have and will continue to advocate for a school that reflects our hard work and aspirations. I believe that the building can be improved and certainly do not wish to obstruct the desire for a better facility. I believe there can be a compromise through a remodeling not a demolition.

I echo the sentiments of many of my peers who believe that, "A historic rehabilitated building "R" will promote pride, tradition, inspiration and remind students to follow their dreams. The students deserve to live in history and have the opportunity to add their own experiences about the R building and Boyle Heights. It is important for the historical physical evidence of our multicultural community, past and present, to continue for future generations."

Roosevelt High Schoolers deserve the best that LAUSD can provide.

Thank you in advance,

Jenesis

--

Jenesis Fonseca-Ledezma (she, her, hers)
 Harvard University | American Studies PhD Student
 Princeton University | Class of 2014
fonseca@g.harvard.edu

*"I did then what I knew how to do.
 Now that I know better, I do better."
 - Maya Angelou*

Letter No. C19: **Jenesis Fonseca-Ledezma**

fonseca@g.harvard.edu

Response C19-1

The comment provides general introductory statements and a statement in opposition to the proposed Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

2/23/18

Mr. Ed Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Ave., 21st Floor
Los Angeles, CA 90017

To Whom It May Concern,

We, the undersigned are organizations and individuals, are writing **to express our support of the Roosevelt High School (RHS) Comprehensive Modernization project**, a plan that puts the safety of Roosevelt High School students first and includes significant improvements to facilities that will support student learning and promote a positive school climate.


We commend the Board of Education for investing \$173 million in Roosevelt High School to modernize new classrooms and the construction of a gymnasium, auditorium, lunch shelter, and support spaces. **We are pleased that the call of '68 walkout alumni for LA Unified to improve the conditions of facilities of Roosevelt High School will be potentially realized** through the Comprehensive Modernization Project.

We'd like to underscore the importance of the Modernization as it relates to **safety and access**. The modernized facilities will boast state of the art technology access, larger classroom size, enhanced access for students with disabilities, and will update buildings to current earthquake prevention code.

We commend LA Unified for its **deliberate inclusion of community input** in the planning process, including the engagement of 21 feeder schools, local community partners, and community members. Community organizational leaders such as InnerCity Struggle and Promesa Boyle Heights have also engaged in the planning of the Modernization Project and support the state-of-the art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of Roosevelt High School, particularly during the 50th anniversary of the 1968 East L.A. Walkouts.

Sincerely,



Arely Garcia

2/23/18

1

Letter No. C20: **Arely Garcia**

[no contact information provided]

Response C20-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

February 15th, 2018

Los Angeles Unified School District Board of Education
333 South Beaudry Avenue, 24th Floor
Los Angeles, CA 90017

Dear Board Members:

It is my pleasure to write this letter in support of our students in Boyle Heights that will eventually enroll at the Roosevelt High School campus.

I would like to convey my full support for the currently proposed Roosevelt High School Comprehensive Modernization Project. Our students deserve state of the art facilities in order to provide them with a first-class education. I recall taking SAT tests at Roosevelt High School and having to stare at the stains on the ceilings and dilapidated classrooms. As a resident of Boyle Heights my parents opted to send me to different schools because they did not feel at home with our local options. With the great strides that our schools are making I am asking that we invest in our schools as a whole to ensure that our future generations, such as quite possibly soon my niece will have a better facility and instructional space.

It is widely known that school facilities have a profound impact on both our students and educators. With regards to our Boyle Heights students, we can attest to the reality that school facilities undoubtedly affect their learning, behavior, engagement, health, achievement and personal growth. The effects aren't limited to students alone considering that teachers, too, are also affected by school facilities when it comes to staffing, retention, and dedication. Our kids and teachers have lacked 21st century facilities for decades and have had to make do with their instructional spaces but this can no longer be the case as we are eager to see change finally take place in our schools.

Our students and teachers, for decades, have endured learning and teaching in inadequate buildings with substandard plumbing, roofing, electrical systems and poor ventilation. Our learners and educators are urgently in need of adequate facilities and resources, which will result from the overall improvements of the modernization project.

We are overjoyed the LAUSD Board of Education has prioritized the Roosevelt High School renovation by investing \$173 million dollars to provide our students with facilities that support their full potential and promising future. These long awaited improvements stem back to the 1968 walkouts when students spoke out against unequal learning conditions in the Eastside.

We owe it to our persevering students who have tolerantly waited for campuses like Roosevelt High School to finally be renovated! Our students deserve first-rate facilities and a first-class education. For this countless reasons, we applaud the currently proposed comprehensive modernization project and look forward to the groundbreaking ceremony to kick-off what will undoubtedly have a positive impact for our Boyle Heights community and our country for many generations.

Respectfully and Moving forward,



Gloria Angelica Gasca
695.019

Letter No. C21: Gloria Angelica Gasca

[no contact information provided]

Response C21-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Blanca Gonzalez Teodoro

Affiliation / Afiliación: Padre de Estudiante (Roosevelt HS)

Address / Dirección: 722 S Soto St L.A. CA 90023

Comment / Comentarios: Yo como padre de un estudiante del 10 grado y uno mas q' yo casi viene a Roosevelt estoy de acuerdo q' este proyecto se realice creo q' ya es hora q' nuestra escuela ya sea renovada y nuestras hijas merecen algo nuevo y limpio para q' ellas tomen clases en aulas saludables

Written comments must be received no later than March 23, 2018 at the following address:

Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

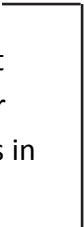
gracias

TRANSLATION

Name: Blanca Gonzalez

Affiliation: Parent of Roosevelt H.S. student -- Teodoro

Comment: As a parent of a 10th grade student and another one who is about to start at Roosevelt, I am in agreement with this project being completed. I think it is about time our school is renovated. Our children deserve something new and clean so they can go to class in healthy classrooms. Thank you.



Letter No. C22: Blanca Gonzalez

Parent of a Roosevelt High School student
722 S. Soto Street
Los Angeles, CA 90023

Response C22-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Chantal Gonzalez

Affiliation / Afiliación: Estudiante

Address / Dirección: 3428 Pomeroy St. Los Angeles Ca. 90063

Comment / Comentarios: Solo tengo una pequeña pregunta
Donde pondran el area de adultos?
Nosotros como adultos necesitamos y tenemos
derecho a aprender.
Todo el proyecto se ve y escucha muy bien
pero se olvidan de nosotros "LAS ADULTOS"

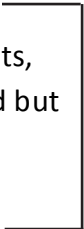
Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
 LAUSD Office of Environmental Health and Safety
 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
 Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Chantal Gonzalez

Affiliation: Student

Comment: I just have one small question: where will you place the adults' area? As adults, we need to learn and have the right to do so. The entire project looks and sounds very good but you are forgetting about us, "THE ADULTS".



Letter No. C23: Chantal Gonzalez

Student
3428 Pomeroy Street
Los Angeles, CA 90063

Response C23-1

The comment raises concerns regarding the location of the Adult Learning Center.

During construction and following the proposed Project, the campus will continue to provide administrative space and shared classrooms for the Boyle Heights Adult Education School. The adult school only functions during evenings or otherwise outside of regular school hours.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Joaquin Gonzalez

Affiliation / Afiliación: _____

Address / Dirección: _____

Comment / Comentarios: _____

~~Hi my n~~ Hi My Name is Joaquin Gonzalez I am a United Students leader from Garfield, I am representing Matthew Teller who comments "This will be good for the community and it will be safe for future generations"

1

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C24: Joaquin Gonzalez

United Students Leader
Garfield High School

Response C24-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Martin Gonzalez

Affiliation / Afiliación: Roosevelt Graduated

Address / Dirección: 457 S Evergreen ave L.A.C 90033

Comment / Comentarios:

What took you so long

We needed that for a long

time Thank you

1

Written comments must be received no later than March 23, 2018 at the following address:
 Envía su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
 LAUSD Office of Environmental Health and Safety
 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
 Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C25: Martin Gonzalez

Roosevelt High School Graduate
457 S. Evergreen Avenue
Los Angeles, CA 90033

Response C25-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C26

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Enaolalpe

Affiliation / Afiliación: Community member

Address / Dirección: 1254 Grand

Comment / Comentarios:

Hello my name is Enaolalpe I am a united students leader from Mendez HS. I am representing Roosevelt High School student Brandon B. who comments, "We need to change how the school looks and for the safety of the future generations."

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

1

HISTORY
IS
TAUGHT!

Letter No. C26: Guadalupe

Community Member

Response C26-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Los Angeles Unified School District
Office of Environmental Health & Safety

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (DEIR)
Roosevelt High School Comprehensive Modernization Project
Borrador del Estudio de Impacto Ambiental (DEIR)
Proyecto de Modernización Integral de Preparatoria Roosevelt

Name / Nombre: Monica Guerrero

Affiliation / Afiliación: MST Magnet at Roosevelt H.S

Address / Dirección: 456 S. Mathews St., Los Angeles

Comments / Comentarios:

I am in full support of the Modernization Project at Roosevelt High. Our mission as a community should be to provide our students with the best resources to make them competitive candidates to get into the college and or career of their choice. Our students deserve high quality facilities to support high quality learning. I understand that Roosevelt has a lot of history, but our new generation of learners deserve to start making history of their own and that begins with modern classrooms and a campus that will help them reach their fullest potential. Let's invest in our students.

1

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de Marzo, 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek

Email: CEQA-comments@lausd.net
Please include "Roosevelt Comp Mod" in the subject line
Incluya "Roosevelt Comp Mod" en la línea de asunto

Letter No. C27: Monica Guerrero

Math, Science, and Technology Magnet Academy at Roosevelt High School
456 South Mathews Street
Los Angeles, CA 90033

Response C27-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C28

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Felipe Gutierrez

Affiliation / Afiliación: Parent ~~Student~~

Address / Dirección: 3956 Gleason St

Comment / Comentarios: I support the construction for Roosevelt H/S for the new students to come to this school.

1

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C28: **Felipe Gutierrez**

Parent
3956 Gleason Street
Los Angeles, CA 90033

Response C28-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

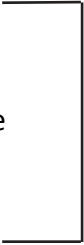
Name / Nombre: María D. Gutierrez
Affiliation / Afiliación: _____
Address / Dirección: 3956 Gleason St L.A., CA.
Comment / Comentarios: Me Interesa el Nuevo Edificio.
Por la seguridad y mejoramiento de
Nuestros Estudiantes y se lo merecen.
Toda la Comunidad y futuros Estudiantes.
Gracias por el Cambio y Mejoramiento a la
Comunidad y familias.

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Maria D. Gutierrez

Comments: I am interested in the new building for the safety and improvement of our students and they deserve it, the entire community and future students. Thank you for the change and improvement to the community and for families.



Letter No. C29: Maria D. Gutierrez

Parent
3956 Gleason Street
Los Angeles, CA 90033

Response C29-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C30

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Daniela Hernandez

Affiliation / Afiliación: Invercity Struggle

Address / Dirección: 530 S Boyle Avenue, Los Angeles, CA 90088

Comment / Comentarios: The modernization of Roosevelt is a victory for the students and community of Boyle Heights. Let's invest in the education and futures of our youth by continuing the full implementation of this project. Our youth deserve a quality education and I am excited about the opportunities that a renovated Roosevelt can offer to them.

1

Written comments must be received no later than **March 23, 2018** at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C30: Daniela Hernandez

InnerCity Struggle
530 S. Boyle Avenue
Los Angeles, CA 90033

Response C30-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Toby Horn <thorn626@gmail.com>
Sent: Thursday, February 15, 2018 9:46 PM
To: Paek, Edward
Cc: Rosalind Sagara
Subject: Save Roosevelt High School

Mr. Paek,

Please listen to the consulting engineer. Mr. Green, and simply rehab the existing building to bring it up to current EQ standards. There is no reason that the building must be demolished.

Just remember how embarrassed LAUSD was because of the Ambassador Hotel debacle. And what did LA Unified do? It overspent on new construction and designed a weak semblance of the perfectly rehabilitatable building that existed. It erased an important part of local history for naught . Also, many, millions of dollars were needlessly spent on defending lawsuits that more appropriately should have gone to educational programs and student support.

1

Show that you can be a strong minded leader and ensure that the standing Roosevelt HS building(s) be retained and rehabilitated.

Thank you,

Toby Horn
146 S. Fuller
Los Angeles 90036

Letter No. C31: Toby Horn

thorn626@gmail.com

Response C31-1

The comment provides general statements in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Juan Ixtan

Affiliation / Afiliación: _____

Address / Dirección: 2722 Wynglen Lane Los Angeles CA 90023

Comment / Comentarios: _____

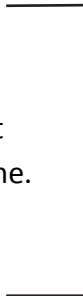
Yo estoy de acuerdo en todo lo que van a construir porque yo pienso que es el mejor preparación para el futuro de nuestros hijos espero que todo salga bien y lo pedimos a Dios que no haya ningún accidente sobre todo el proceso de la construcción y que Dios bendiga a todos
Bendiciones.

Written comments must be received no later than March 23, 2018 at the following address:
Envía su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Juan Ixtan

Comment: I am in agreement with everything that you will build because I think it is the best preparation for the future of our children. I hope everything goes well. We ask God that there be no accidents, especially during the construction process and may God bless everyone. Blessings [to you].



Letter No. C32: **Juan Ixtan**

2722 Wynglen Lane
Los Angeles, CA 90023

Response C32-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C33

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Nidia L. Jimenez

Affiliation / Afiliación: Estudiante adulto (ingles.)

Address / Dirección: 2707 E. 5th St L.A.

Comment / Comentarios:

Hola!! yo tengo dos inquietudes
la numero uno es para la compania CEQA
hablando de salud personal, cuanto nos puede
dañar a las personas que vivimos cerca de
la escuela con la demolición?

Written comments must be received no later than March 23, 2018 at the following address:

Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

estube en la reunion y me preocupa que en
el proyecto y recorrido virtual no mire la
propuesta de mover las aulas en las
que tomamos las clases de ingles,
de antemano les agradezco por
el proyecto espero su respuesta y
que nos tomen en cuenta a los
alumnos de adultos ingles.

(Gracias)

TRANSLATION

Name: Nidia L. Jimenez

Affiliation: Adult student (English)

Comment: Hello!! I have two concerns: the first one is for the CEQA company. Speaking of personal health, how much can the demolition harm us, those of us who live close to the school? I was at the meeting and I was worried that in the project and the virtual tour I did not see a proposal for moving the classrooms where we take English classes. I thank you beforehand for the project. I await your response and [hope] you will take us into account, the adult students of English.

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(Thank you)

Letter No. C33: **Nidia L. Jimenez**

Adult Student
2707 E. 5th Street
Los Angeles, CA 90033

Response C33-1

The comment raises concerns regarding health risks during the demolition phase of the proposed Project.

The Draft EIR acknowledges that during construction, sensitive receptors could be exposed to a variety of airborne emissions including those from construction equipment. However, due to the limited scale and phasing of construction, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. Additionally, the localized construction impacts summarized in **Table 3.1-5** reflect work done by the SCAQMD to provide conservative screening levels for potential health impacts for sensitive receptors near proposed Projects. That is, the thresholds shown in **Table 3.1-5** are considered by the SCAQMD to be minimum levels at which it is possible health impacts might occur given worst-case conditions for receptors within 25 meters of a project with a maximum of 5 acres graded per day. Emissions below those levels would not cause impacts to sensitive receptors, including students, even in worst-case conditions. Compliance with SCAQMD Rule 403 and implementation of LAUSD Standard Conditions of Approval would ensure that the proposed Project would not exceed any of the SCAQMD regional or localized significance thresholds for air quality emissions during construction, impacts would be less than significant, and no mitigation is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C33-2

The comment raises concerns regarding the location of the Adult Learning Center.

During construction and following the proposed Project, the campus will continue to provide administrative space and shared classrooms for the Boyle Heights Adult Education School. The adult school only functions during evenings or otherwise outside of regular school hours.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: rosalielazarus@roadrunner.com
Sent: Saturday, February 17, 2018 11:01 AM
To: Paek, Edward
Subject: roosevelt high

Please consider the history of the school and preserve it and don't destroy more of los angeles . Rosalie Lazarus

1

Letter No. C34: Rosalie Lazarus

rosalielazarus@roadrunner.com

Response C34-1

The comment provides general statements in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

GODEK, GWENN

From: Sara Magallon <saraymagallon@gmail.com>
Sent: Thursday, March 22, 2018 2:32 PM
To: California Environmental Quality Act Comments
Subject: RHS Comp Mod

To whom it may concern,

I am an RHS alumni, class of 2006. I grew up a block away from RHS. All three of my siblings, numerous cousins, aunts and uncles attended Roosevelt. This school holds many memories for my family and I, not to mention all the history since it was established in 1922. RHS is a large factor in the history of Boyle Heights. Demolishing our school will be like erasing the Walkouts of 1968 which are national history; the influx of European immigrants; the multicultural diversity of our student body; the evacuation of the Japanese American students during WWII.

In a time where wealth is driving the underprivileged out of our communities, it is important to keep what we can. I understand that the school needs renovations and the R Building needs plenty of seismic retrofits, but this is all manageable while restoring the historic value of the R Building. I confidently say retrofits can be made because since graduating RHS in 2006, I have received a degree in Civil Engineering and currently pursuing a graduate degree in Geological Engineering. I have worked on many seismic retrofit projects, with more complex issues, and know we can upgrade the R Building without having to raze it.

I insist that you consider "Alternative 2" in the modernization plans for RHS. Let those who have attended RHS and those who will one day attend RHS, keep a little bit of our history with them.

Thank you,
Sara Magallón
RHS c/o 2006

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Letter No. C35: Sara Magallon

saraymagallon@gmail.com

Response C35-1

The comment provides general statements in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: jonathan manzanas <jonnyboie1@icloud.com>
Sent: Thursday, March 29, 2018 8:21 PM
To: California Environmental Quality Act Comments
Subject: R building

To whom it may concern,
My name is Jonathan Manzanas and I went to RHS. I would like to support the R building from being demolished.
Being keep out history alive for as long as possible. Thanks

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Sent from my iPhone

Letter No. C36: Jonathan Manzanares

Jonnyboie1@icloud.com

Response C36-1

The comment provides a general statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C37

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: KEVIN MEAGHER AND DIANA MEAGHER
Affiliation / Afiliación: HOME OWNER EMAIL: TOLUCA KEVIN@GMAIL.COM
Address / Dirección: 513 SOUTH MATHEWS ST
Comment / Comentarios: QUESTIONS

- ① START AND END DATE OF ALL CONSTRUCTION? _____
- ② ANY ZONING CHANGES FOR OUR PROPERTY ON MATHEWS ST? _____
- ③ ANY CHANGE TO STREET ITSELF WHEN DONE? _____
- ④ ANY CLOSURE OF MATHEWS DURING CONSTRUCTION? _____
- ⑤ ANY IMPROVEMENTS TO MATHEWS ST ITSELF? _____

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Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C37: Kevin and Diana Meagher

2722 Wynglen Lane
Los Angeles, CA 90023

Response C37-1

The comment requests information regarding the construction schedule for the proposed Project.

Construction activities are anticipated to begin in Quarter 3-2018 and will be substantially completed in Quarter 4-2022.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C37-2

The comment asks if there will be any zoning changes as a result of the proposed Project.

No changes to any local property zoning will occur as a result of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C37-3

The comment asks if there will be any changes or improvements to Mathews Street, or whether there will be any street closures as a result of the proposed Project.

No changes will be made to Mathews Street as a result of the proposed Project.

No road closures are anticipated during construction, a worksite traffic control plan would minimize impacts of all construction traffic flows and vehicle parking areas on site pick-up/drop-off activities. In addition, flag persons should be stationed at each site construction access point to control conflicts between pedestrians, vehicles in travel lanes, and pedestrians on the sidewalk.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

GODEK, GWENN

From: Keiko Miya <miyak35@gmail.com>
Sent: Friday, March 23, 2018 8:58 PM
To: California Environmental Quality Act Comments
Cc: rsagara@laconservancy.org
Subject: Rehabilitation of RHS's R-Building and preservation of some of the trees

Gentlepersons,

As a former teacher and a friend and relative of many people who have graduated from Roosevelt, I, Keiko Miya urge you to preserve and rehabilitate the R Building. It is a building with rich "character", unlike many sterile looking buildings that are being constructed in the last 30 to 40 years.

In addition, there are many trees and plants on campus that have been planted by many people's efforts. The idea for the Japanese Garden was nurtured and came to fruition by the efforts of a student Shigeo Takayama, who attended Roosevelt in the 1930's. This original one was destroyed during WWII's wartime hysteria and wildness. More gentle Boyle Heights community in the 1990's rallied on rebuilding the garden (though much diminished in size) at another location in 1996. In 2005 the former student and builder of the original garden of 1935, Mr. Takayama financed the refurbishment and maintenance of the now called Garden of Peace. This garden needs to be perpetuated.

I was a teacher of Japanese from 1996 to 2013 at Roosevelt. On Mar. 11, 2011, I lost seven members of my family in Japan, including father and brother and his family, to the earthquake and ensuing tsunami. Roosevelt High School raised my morale in many ways. One of them was to plant, in Jan 2012, a very young cherry tree of the "Pink Cloud" variety on the lawn facing the T-building and S-building to honor the lives of the lived ones I lost. I have purchased a bronze plaque to identify the tree and to have it live in perpetuity. I am waiting to place the plaque when the tree will have a permanent "home" on Roosevelt's campus. All principals since 2012 have welcomed the tree wholeheartedly. If the present location will not work for "Pink Cloud", I hope that the designers of the updated campus will find the perfect spot at Roosevelt for it to grace the school with its bright pink color.

Thank you for your kind attention and hope that the good graces will lead you to make peaceful decisions.

Sincerely yours,
Keiko Miya

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Letter No. C38: **Keiko Miya**

Miyak35@gmail.com

Response C38-1

The comment concerns the overall merits of the proposed Project due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment also contains reminiscences of campus life and information regarding the recent gift of a 'Pink Cloud' tree to the campus to commemorate the loss of Japanese lives during the 2011 earthquake and subsequent tsunami.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Noelia Moran

Affiliation / Afiliación: Familias Unidas

Address / Dirección: 2229 Rogers Av

Comment / Comentarios:

*No apoyo este proyecto, porque: si queremos lo mejor para nuestras estudiantes, tenemos que darles lo mejor, los edificios ya no son muy seguros y la nueva construcción, dara mas seguridad para profesores y estudiantes.
Tengo una hija graduada de aquí, y se lo importante que*

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333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

es para la comunidad, una renovación en esta escuela.

TRANSLATION

Name: Noelia Moran

Affiliation: Families United [*Familias Unidas*]

Comment: I support this project because: if we want the best for our students, we have to give them the best, the buildings are no longer very safe and the new construction will provide more safety for teachers and students.

I have a daughter who graduated from here and I know how important a renovation in this school is for the community.

Letter No. C39: **Noelia Morán**

Familias Unidas
2229 Rogers Avenue
Los Angeles, CA 90023

Response C39-1

The comment includes statements in support of the proposed Project.

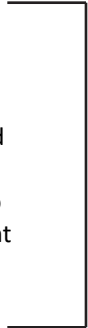
The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Valerie Najera <najeravalerie@gmail.com>
Sent: Wednesday, April 4, 2018 6:34 PM
To: California Environmental Quality Act Comments
Subject: RHS Comp Mod

Dear Mr. Edward Paek

I am writing to express my concern about the preservation of R building at Roosevelt High. Although I was not able to attend RHS myself, my father and his siblings and most of my friends from Hollenbeck Middle School did. I remember walking through the campus with complete admiration for the history in the buildings, knowing that my dad had walked the same campus. I was born and raised in Boyle Heights, and it is devastating to think that something from my very roots can be completely destroyed and taken away from me and my community. I'd love to take my children one day to the Roosevelt and show them the school their grandfather attended many years before. Please, please take into account what this school's history means to the people of the community and preserve it.



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Thank you,
Valerie Najera

Letter No. C40: Valerie Najera

najeravalerie@gmail.com

Response C40-1

The comment provides a general statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Carol Ng <carolng38@yahoo.com>
Sent: Thursday, March 15, 2018 1:48 AM
To: Paek, Edward
Subject: Roosevelt High School

Dear Mr. Paek,

I am not a resident of the Roosevelt area but a resident of Marshall High School's area. I want to point out that after the 1971 earthquake, Marshall suffered considerable damage. LAUSD's solution was to raze this historic structure.

Instead, the alums and community members protested. I believe some politicians also supported saving the main building. LAUSD eventually relented, gutted the damaged area, reinforced it and rebuilt the main building in its original Gothic style. They put in new windows and added air conditioning. As the school has a classic exterior and could be "anywhere", it has been used for numerous movie and television locations, thus garnering a return on the money spent to restore the building.

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Sadly, Los Angeles High was not so lucky. After the same earthquake, its classic style main building was razed by LAUSD and a new, nondescript building replaced it.

Because of Roosevelt's significance in the 1968 walkouts, it should be appropriately preserved. Although LAUSD's first response is to raze, it is possible to preserve as demonstrated by the Marshall example.

I strongly urge you to reconsider.

Sincerely,
Carol Ng
323-665-4448
carolng38@yahoo.com

Letter No. C41: **Carol Ng**

carolng@yahoo.com

Response C41-1

The comment provides a general statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C42

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Cynthia Olmos

Affiliation / Afiliación: Community member

Address / Dirección: 3495 Eagle St, Los Angeles, CA, 90063

Comment / Comentarios:

So students don't feel safe in buildings knowing they can fall anytime. The wellness center is beneficial to the community and students. Murals should represent what the community wants to show.

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Written comments must be received no later than March 23, 2018 at the following address:
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333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C42: **Cynthia Olmos**

Community Member
3495 Eagle Street
Los Angeles, CA 90063

Response C42-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C42-2

The comment includes statements in support of the campus murals.

The campus murals are powerful expressions of the Roosevelt HS student social activism, culture, and community struggles. The report discusses four exterior murals and one interior mural, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural. In addition, the *El Plan del Pueblo – Boyle Heights*, prepared by the East LA Community Corporation, identifies the *Anahuac* mural, located along the perimeter retaining wall at Mott Street and 6th Street as one of cultural significance and the longest and largest mural in Boyle Heights.¹⁵

As part of the proposed Project, Building 1, which contains the Harvey Milk Day of Service mural and the portable buildings on which the four exterior murals are painted would all be demolished or removed. While LAUSD does not have a formal mural policy, artists are typically required to complete a license agreement which waives all rights to any mural painted on LAUSD property. In the absence of such a license agreement, the mural would be subject to the California Art Preservation Act, under which LAUSD would be obligated to contact the artist and request a waiver prior to removal. In either case, the murals would be documented and retained in archival records. As recommended by the report, the proposed Project includes areas where new murals can be painted.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

¹⁵ https://issuu.com/eastlacommunitycorporation/docs/plandelpueblo_english_digitalversio

COMMENT CARD / TARJETA DE COMENTARIO

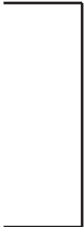
Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Rosa C. Peña
Affiliation / Afiliación: clases de adulto ingles
Address / Dirección: 2422 WABAS AV. LA. CA. 90033
Comment / Comentarios: Necesitamos educación de calidad
para nuestros niños en un lugar
seguro y limpio con buenos maestros
para eso pagamos taxes ya est tiempo
que agan algo
Rosa Peña.

Written comments must be received no later than **March 23, 2018** at the following address:
Envia su comentarios antes de **23 de marzo 2018** a la siquent dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Rosa C. Pena
Affiliation: Adult English classes
Comment: We need quality education for our children in a safe and clean place, with good teachers, that is why we pay taxes. It is about time something is done.
Rosa Pena.



Letter No. C43: **Rosa C. Peña**

Adult English Classes
2422 Wabash Avenue
Los Angeles, CA 90033

Response C43-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

GODEK, GWENN

From: dora perez <perezdora3@gmail.com>
Sent: Friday, March 23, 2018 10:13 AM
To: California Environmental Quality Act Comments
Subject: RHS como Mod

To whom it may concern:
I understand that there must be renovations to RHS “R Building” for safety & logistics matters, however the replacement should/could have the same face as to not lose the historical face of RHS. So that future generations can have a piece of our RHS Culture

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Letter No. C44: **Dora Perez**

Perezdora3@gmail.com

Response C44-1

The comment concerns the overall merits of the proposed project, primarily due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Laura Romo <romolaura96@gmail.com>
Sent: Thursday, March 22, 2018 10:37 PM
To: Paek, Edward

March 23, 2018

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

Dear Mr. Paek:

I'm writing to comment on the Modernization Project. The project will demolish Roosevelt High's original Auditorium and the college corner also the classrooms I had, the R building should be eligible and counted as a historic district and an individually eligible historic building. I want to save the building because I feel it is the heart of the school as well as the main building in the school. I appose the demolition and I want to fight to keep it standing in the future as well as it has done in the past . I wish to see my son going to the school and be educated what happened around that building. I had most of my classes in there, so many memories I had and I won't forget and seeing the building is a great feeling I remember my first day of school my two brothers walked me and showed me around telling me "this is the R building , you can't miss it it's the one in the middle and most of your classes are there". My parents and my four brother all went to Roosevelt and we all graduated. I graduated in 2014 and till this day I take my son there for walks just like my dad use to take me and my brothers to play basketball, tennis , soccer and other sports as a family so i want to know where will you guys move the tennis courts ? .

While I appreciate LAUSD's inclusion of preservation alternatives that retain and upgrade the R Building as part of the Roosevelt High Comp Mod project in the DEIR, I do not agree with LAUSD's statement that "each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impact of the Project."I think if more room was needed the R building has more floors on top that were never used my four years I was there

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was never a time where I didn't here "they are working on the fourth floor " but it was never done . The air conditioning was always getting worked on as well and I remember how amazing it was that we never cared on how it looks , The teachers were amazing despite how hot it was , it was terrible and the problems in the R building were never fixed and they should of we didn't deserve to be in a hot room trying to learn and have so many kids in one class . I might not know how bad the problems were in the building but I'm sure it could have been fixed all these years and there wouldn't be anything to fix if it was fixed all these years and there would of been more space for kids in other rooms and then there wouldn't have to be a cut on teachers that were the best and they had to go when they could of been teaching in rooms that were never used . All those rats we saw and bugs could of also been avoided. I just feel like it you guys should extend it and really think about it . I think Alternitive 2 is the best for all of us we can have both modernization and our Heart in there as well (R Building).

2

I am concerned that LAUSD has not provided sufficient details or opportunities to learn about the preservation alternatives:

- LAUSD outreach fliers regarding the Roosevelt High School Comprehensive Modernization Project do not inform the public that LAUSD propose demolition of historic and culturally significant buildings, including the R Building, at Roosevelt High.
- At a CEQA meeting held at the Roosevelt High Auditorium on February 21, 2018, the preservation alternatives were not discussed in any detail.
- Figures 4.0-2, 4.0-3, and 4.0-4 included in the DEIR outline the historic buildings to be demolished, but do not show where campus-wide modernization would be placed should the historic buildings be preserved as part of Alternative 2, 3, and 4, respectively. Further, at a public meeting hosted by the Committee to Defend Roosevelt on March 17, 2018, a new Alternative 2 site plan was presented to those in attendance, but is not available for public review.

3

I also want to add that please consider adding a parking structure. The traffic on 4th street Mott street and Eagle street , the traffic is horrible as well as parking. My dad goes to work passing on 4th street and he says he needs to put gas at night so the morning he can avoid how bad the traffic is and imagine putting the entrance there it just won't work . It's not considering the house owners around here and especially tax payers . Another thing is that I am very upset that my family didn't know about this until November 2017 was when we found out and I feel like it wasn't really out there to the neighbors and the parents of the students. I am a member of The Committee To Save Roosevelt and I talked to people if they knew that the modernization was going to knock down the R building no one knew and they were surprised ! I also think it was more out because of my family we all helped to spread the word of what was really happening we left papers at my brothers Barber shop (LA City Clips) down the street of Roosevelt. And I was contacted by channel news 11 and I was interviewed . I talked about the buildings that were getting destroyed and how mad I was that it was out there for everyone to know . On the paper you guys past out wasn't clear to me I feel like that should of been included in clear words.

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In addition, Roosevelt High has been identified as a National Register-eligible historic district for its association with the 1968 student walkouts and Chicano Civil Rights movement by Los Angeles' SurveyLA in 2014 and LAUSD's Supplemental Historic

6

Resource Evaluation Report for the campus in May 2017. Roosevelt High's R Building, specifically, has been documented as a primary setting for activities associated with the nationally significant 1968 Blowouts.

Alternative 2: Retention and Renovation of Building 1 is preferred mitigation for the significant and unavoidable environmental impacts caused by the demolition of the Roosevelt Senior High School Historic District, and important and rare collection of historic resources in Boyle Heights. As stated in the DEIR, Alternative 2 meets most of the Roosevelt High Comp Mod project objectives. It also partially, or entirely meets the following:

Retaining the R Building does not prevent integration of 21st century technology in rehabilitated classroom spaces. While the R Building's existing structural layout may limit classroom proportions, many classrooms may be enlarged to meet California Department of Education educational specifications. What approaches were considered when LAUSD stated that the seismic retrofit would result in an inefficient utilization of space? Would LAUSD consider revising the Alternative 2 site plan to find additional areas for classroom spaces?

6

Retaining and rehabilitating the R Building as part of the modernization is compatible with the overall project objectives of creating distinct academic and athletic zones. The proposed gym has been placed along the same axis as the academic zone in the proposed project, so retaining the R Building would simply require it be moved further south and would not impede improving the overall functionality and utility of the campus.

Modern and permanent classrooms can be achieved by retrofitting and rehabilitating the R Building. Has a cost analysis of Alternative 2 been commissioned? If so, can you make it available for public review and input? Additionally, various approaches to preservation solutions may result in different associated costs. How were approaches to retrofit and rehabilitation of Alternative 2 considered? .

If retrofitted and rehabilitated, the R Building can meet student and faculty needs.

The athletic zone would not be bisected if the R Building is retained as stated in the DEIR. Reconfiguration of the site plan can improve campus access, safety supervision, and circulation.

In addition, LAUSD's action on August 22, 2017 to authorize the Chief Procurement Officer to enter into a contract (\$144,357,565) with Swinerton Builders and LPA, Inc. for the "Design and Construction of the Roosevelt High School Comprehensive Modernization Project" appears to pre-commit LAUSD to a specific design rather than allowing the environmental review process to inform the design of the project, as required by law. Has a contract been signed and was any CEQA review or clearance completed for this action? Are there contingencies in the contract, should LAUSD pursue a preservation alternative?

7

I am really concerned about the increase in noise and traffic that the proposed project will cause.

8

Thank you for the opportunity to comment on the DEIR for the Roosevelt Comp Mod Project.

Sincerely,
Laura Romo
Roosevelt High School Alumni, 2014
Committee to Defend Roosevelt
Romolaura96@gmail.com 3234232279

From: Laura Romo

Sent from my iPhone

Letter No. C45: Laura Romo

Romolaura96@gmail.com

Response C45-1

The comment concerns the overall merits of the proposed project, primarily due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C45-2

The comment expresses opposition to the proposed Project, opinions regarding the state of Building 1, and the evaluation of alternatives in the Draft EIR.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C45-3

The comment raises concerns regarding the public engagement process and community outreach. The comments also states a concern that 'new information' regarding Alternative 2 to the proposed Project was provided at a meeting held on March 17, 2018.

However, contrary to the commenter's assertion, the information provided at the meeting was not new, and was provided to those present at the meeting to expand on, and clarify information which had already been provided in the Draft EIR.

Refer also to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C45-4

This comment recommends the inclusion of a parking structure in the proposed Project, and expresses concern regarding the new entrance on 4th street.

Parking Standards for LAUSD schools are provided in LAUSD's School Design Guide. All vehicular access and parking would comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to parking:

- Parking Space Requirements
- General Parking Guidelines
- Vehicular Access and Pedestrian Safety

The proposed Project would continue to provide staff parking in accordance with LAUSD standards of 2.25 spaces per high school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County.

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Response C45-5

The comment raises concerns regarding the public engagement process and community outreach.

Refer also to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C45-6

This comment requests additional analysis and re-design for the Alternative 2 project renovations to Building 1.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

Response C45-7

The comment raises concerns in connection with LAUSD using a design-build strategy for project delivery.

Refer to **Topical Response 2, Precommitment to the Proposed Project.**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C45-8

The comment expresses concerns regarding the potential for the proposed Project to cause increases in noise and traffic in the Project vicinity. The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

For the record, potential noise and traffic impacts were analyzed in **Section 3.4, Noise** and **Section 3.6, Transportation and Traffic** in the Draft EIR.

April 6, 2018

Mr. Edward Paek, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: edward.paek@lausd.net

Dear Mr. Paek:

I'm writing to comment on the Roosevelt High Comprehensive Modernization Project Draft Environmental Impact Report. The project will demolish Roosevelt High's original Auditorium and Classroom, a primary contributor to a National Register-eligible historic district and an individually eligible historic building in Boyle Heights. It's also where my brothers and I had many of our high school classes and where we made cherished memories. I want the building to be kept and upgraded because it is the heart of the school and an important landmark in our neighborhood. I oppose the demolition of the R Building and I want to help LAUSD find a way to maintain it now and in the future. I wish to see my son going to classes in a beautifully restored and modern R Building, where he may also connect and be inspired by our important Roosevelt High and Boyle Heights heritage.

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Of the memories I have and I won't forget is seeing the R building on my first day of school, when my two brothers walked me to school and showed me around telling me, "This is the R building, you can't miss it, it's the one in the middle, and most of your classes are there." My parents and my four brothers and I all went to Roosevelt High and we all graduated. I graduated in 2014 and to this day, I still take my son there for walks just like my dad used to take me and my brothers to play basketball, tennis, soccer and other sports as a family.

While I appreciate LAUSD's inclusion of preservation alternatives that keep and upgrade the R Building as part of the Roosevelt High Comp Mod project in the DEIR, I do not agree with LAUSD's statement that "each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impact of the Project." I think if more room was needed for classroom use, the R building has more floors on top that were never used during the four years I attended Roosevelt. There wasn't a time when I didn't hear: "They are working on the fourth floor," but it was never completed. The air conditioning was always getting worked on as well and I remember how amazing it was that we never cared how our building looked, or how hot it was without air conditioning. Our teachers were amazing despite the learning environment. In fact, it was a terrible learning environment and the problems in the R building were never fixed and they should have been because we didn't deserve to be in a crowded hot room trying to learn. But, we

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did learn despite these challenges. I may not even have known how bad the problems were in the building, but I'm sure it could have been fixed all these years and if it had, people wouldn't think that demolition was the only solution now. Perhaps then, too, great teachers wouldn't have been fired or left to teach elsewhere. All those rats we saw and bugs could have also been taken care of. LAUSD needs to extend the public comment period for at least 45 days so the public can review and provide comment on Alternative 2 as the preferred and best development option for Roosevelt High's Comp Mod project.

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I am concerned that LAUSD has not provided sufficient details or opportunities to learn about the preservation alternatives:

- LAUSD outreach fliers regarding the Roosevelt High School Comprehensive Modernization Project do not inform the public that LAUSD propose demolition of historic and culturally significant buildings, including the R Building, at Roosevelt High.
- At a CEQA meeting held at the Roosevelt High Auditorium on February 21, 2018, the preservation alternatives were not discussed in any detail.
- Figures 4.0-2, 4.0-3, and 4.0-4 included in the DEIR identify the historic buildings to be demolished, but do not show where campus-wide modernization would be placed should the historic buildings be preserved as part of Alternative 2, 3, and 4, respectively. Further, at a public meeting hosted by the Committee to Defend Roosevelt on March 17, 2018, a new Alternative 2 site plan was presented to those in attendance, but is not available for public review.

4

Please also consider adding a parking structure to Alternative 2. The traffic and parking on 4th and Mott streets and Eagle street is horrible. My dad goes to work passing on 4th street and he says he needs to put gas at night to avoid how bad the traffic is in the morning. If you are going to add new amenities to Roosevelt High, you must consider how this will add to the residents' and taxpayers' concerns over parking and traffic. To ignore this issue is irresponsible. Adding a parking structure may help alleviate some site planning issues with respect to Alternative 2 as well.

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Roosevelt High has been identified as a National Register-eligible historic district for its association with the 1968 student walkouts and Chicano Civil Rights movement by Los Angeles' SurveyLA in 2014 and LAUSD's Supplemental Historic Resource Evaluation Report for the campus in May 2017. Roosevelt High's R Building, specifically, has been documented as a primary setting for activities associated with the nationally significant 1968 Blowouts.

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Alternative 2: Retention and Renovation of Building 1 is preferred mitigation for the significant and unavoidable environmental impacts caused by the demolition of the Roosevelt Senior High School Historic District, an important collection of historic and culturally significant resources in Boyle Heights. As stated in the DEIR, Alternative 2

meets most of the Roosevelt High Comp Mod project objectives. It also partially, or entirely meets the following:

Retaining the R Building does not prevent integration of 21st century technology in rehabilitated classroom spaces. While the R Building's existing structural layout may limit classroom proportions, many classrooms may be enlarged to meet California Department of Education educational specifications. What approaches were considered when LAUSD stated that the seismic retrofit would result in an inefficient utilization of space? Would LAUSD consider working with our Committee and supporters to revise the Alternative 2 site plan to find additional areas for classroom spaces and improve site circulation?

Retaining and rehabilitating the R Building as part of the modernization is compatible with the overall project objectives of creating distinct academic and athletic zones. The proposed gym has been placed along the same axis as the academic zone in the proposed project, so retaining the R Building would simply require it be moved south and would not impede improving the overall functionality and utility of the campus.

Modern and permanent classrooms can be achieved by retrofitting and rehabilitating the R Building. Has a cost analysis of Alternative 2 been commissioned? If so, can you make it available for public review and input? Additionally, various approaches to preservation solutions may result in different associated costs. How were approaches to retrofit and rehabilitation of Alternative 2 considered?

If retrofitted and rehabilitated, the R Building can meet student and faculty needs.

The athletic zone would not be bisected if the R Building is retained as stated in the DEIR. Reconfiguration of the site plan can improve campus access, safety supervision, and circulation.

In addition, LAUSD's action on August 22, 2017 to authorize the Chief Procurement Officer to enter into a contract (\$144,357,565) with Swinerton Builders and LPA, Inc. for the "Design and Construction of the Roosevelt High School Comprehensive Modernization Project" appears to pre-commit LAUSD to a specific design rather than allowing the environmental review process to inform the design of the project, as required by law. Has a contract been signed and was any CEQA review or clearance completed for this action? Are there contingencies in the contract, should LAUSD pursue a preservation alternative?

Another point I am very upset about is my family didn't know about the Roosevelt High Comp Mod project until November 2017. I feel like there wasn't enough outreach to Roosevelt High neighbors, nor the parents of Roosevelt students. I am a member of the Committee To Defent Roosevelt and I have talked to many people in our neighborhood and have asked if they knew that the modernization was going to knock down the R

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building. No one I spoke to knew and they were surprised when I told them more about it. More people in the neighborhood know about this project because my family has helped to spread the word, including leaving fliers at my brother's barber shop (LA City Clips) down the street from Roosevelt. I was also contacted by Channel 11 News for a television interview. I talked about the buildings that would be demolished and how mad I was that about it. The flier LAUSD used to inform the public about the modernization project did not mention demolition to the public and that was misleading.

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I am also really concerned about the increase in noise and traffic that the proposed project will cause, as I live one block away from Roosevelt High School.

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Thank you for the opportunity to comment on the DEIR for the Roosevelt Comp Mod Project.

Sincerely,

Laura Romo
Boyle Heights resident
Roosevelt High School Alumni, 2014
Committee to Defend Roosevelt, member
Romolaura96@gmail.com
323-423-2279

Letter No. C46: Laura Romo

Romolaura96@gmail.com

Response C46-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, along with personal reminiscences of campus life, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-2

The comment expresses opposition to the proposed project, opinions regarding the state of Building 1, and the evaluation of alternatives in the Draft EIR.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-3

The comment requests the extension of the statutory 45-day comment period on the Draft EIR for the proposed Project.

As a result of requests by both public officials and members of the general public, the Lead Agency, Los Angeles Unified School District (LAUSD) accepted late comments for an additional 15 days, which ended on April 6, 2018 at 5pm.

Response C46-4

The comment raises concerns regarding the public engagement process and community outreach.

Refer to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-5

This comment recommends the inclusion of a parking structure in the proposed Project.

Parking Standards for LAUSD schools are provided in LAUSD's School Design Guide. All vehicular access and parking would comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to parking:

- Parking Space Requirements
- General Parking Guidelines
- Vehicular Access and Pedestrian Safety

The proposed Project would continue to provide staff parking in accordance with LAUSD standards of 2.25 spaces per high school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County.

Response C46-6

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, and a statement in opposition to the Project, due to the historical nature of the campus buildings. The comment also discusses perceived deficiencies in the evaluation of Alternative 2.

As stated in Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the

project, and evaluate the comparable merits of the alternatives. However, an EIR need not consider every conceivable alternative to a project. The Draft EIR provides a range of potential alternatives to the proposed project which includes those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. LAUSD, as the Lead Agency is solely responsible for selecting a range of project alternatives for examination.

Refer also to **Topical Response 1: Responses to Comments Supporting Alternative 2.**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-7

The comment provided an opinion that a reconfiguration of the site plan could improve campus access, safety supervision, and circulation. The comment does not raise an environmental issue within the meaning of CEQA, no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response C46-8

The comment raises concerns in connection with LAUSD using a design-build strategy for project delivery.

Refer to **Topical Response 2, Precommitment to the Proposed Project.**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-9

The comment raises concerns regarding the public engagement process and community outreach.

Refer also to **Topical Response 3, Community Outreach regarding the Proposed Project**

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C46-10

The comment expresses concerns regarding the potential for the proposed Project to cause increases in noise and traffic in the Project vicinity. The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

For the record, potential noise and traffic impacts were analyzed in **Section 3.4, Noise** and **Section 3.6, Transportation and Traffic** in the Draft EIR.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Maria Ruiz
Affiliation / Afiliación: Residente y padre de Familia
Address / Dirección: 1150 S Orme Ave LA, CA 90023
Comment / Comentarios: Yo Apoyo la Modernización de Roosevelt HS. Es importante para nuestros estudiantes. Mi hijo graduo de Roosevelt en 2017 y el tuvo carencias y problemas en el edificio R esta viejo y hace falta tecnología para que los estudiantes aprendan. Me interesa la seguridad

Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

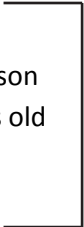
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

TRANSLATION

Name: Maria Ruiz

Affiliation: Resident and parent

Comment: I support the modernization of Roosevelt H.S. It is important for our students. My son graduated from Roosevelt in 2017 and he suffered deficiencies and problems in the R building. It is old and technology is needed so that students can learn. I am interested in safety.



Letter No. C47: Maria Ruiz

Resident and Parent
1150 S. Orme Avenue
Los Angeles, CA 90023

Response C47-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Letter C48

Name / Nombre: Maribel Sarabia

Affiliation / Afiliación:

Address / Dirección: 3102 E. 2nd St L.A., CA. 90063

Comment / Comentarios:

Me pareció maravilloso el proyecto de remodelación ya que es una necesidad de Seguridad, Mejor Aprendizaje y buena calidad Educativa... Solo les pido que nos ayuden a que sean nuestras familias sean las que se beneficien de este proyecto... Por que el costo de

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LAUSD Office of Environmental Health and Safety

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: Edward Paek

CEQA-comments@lausd.net

estamos siendo invadidos por personas ajenas a nuestra comunidad, y con nuestra nueva escuela habra mas intereses para todas las inversionistas que estan construyendo vivienda a altos costos que nuestra comunidad No pueden pagar y hoy por hoy es muy doloroso como sufrimos por estas personas inhumanas que ni siquiera pertenecen a Boyle Heights

Gracias por este gran proyecto

y sigan apoyando a nuestras comunidades ya que nuestros hijos tambien se merecen la mejor calidad Educativa con una buena seguridad y las mejores herramientas.

TRANSLATION

Name: Maribel Sarabia

Comment: I thought the remodeling project was wonderful because it is necessary from a safety [standpoint] and for better learning and good educational quality... I just ask that you help us so that our families are the ones who will benefit from this project... Because the cost of living is increasing more and more every day and we are being invaded by people who are not from this community... [crossed out text, illegible]

we are being invaded by people foreign to our community, and with our new school there will be more interest from all the investors who are building housing at a high cost, which our community cannot afford, and currently it is very painful how we suffer because of these inhuman people who don't even belong to Boyle Heights.

Thank you for this great project and [please] continue to support our communities because our children also deserve the best educational quality with good safety and the best tools.

Letter No. C48: Maribel Sarabia

3102 E. 2nd Street
Los Angeles, CA 90063

Response C48-1

The comment includes statements in support of the proposed Project, and includes concerns regarding area gentrification.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C49

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Cecilia Sutherland

Affiliation / Afiliación: _____

Address / Dirección: _____

Comment / Comentarios: _____

Hi My Name is Cecilia Sutherland, I am a United Students leader from Mendez High School. I am representing Roosevelt Student Arianna Lopez who comments Students Deserve a Modern School where we are in a Safer environment

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Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C49: Cecilia Sutherland

United Students Leader
Mendez High School

Response C49-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Laura Torres <torresla07@gmail.com>
Sent: Tuesday, February 20, 2018 7:06 PM
To: Paek, Edward
Cc: rsagara@laconservancy.org
Subject: The Roosevelt High School Comprehensive Modernization Project

Hello Mr. Edward Paek,

Thank you for your time and considering my comments. I unfortunately can not attend the meeting tomorrow evening. I work late. I also apologize for just now joining the conversation. I was unaware of the proposed demolition until last week.

I am a alum of Roosevelt high and a long time resident of Boyle Heights. I still love in the same apartment I did as when I was a student at Roosevelt. I like many have a deep love and connecting to my community of Boyle Heights. I was shocked that I had not heard of this plan until last week.

I am sure the LA conservancy is sharing many great reasons of the historic cultural significance of the campus, and its strong connections to the Boyle Heights community, we are concerned about the loss of this important community asset.

As a member of the community and alum of Roosevelt, i urge you to preserve the R building and restore the Japanese Garden. There is so much history there and inspiration not only for alums but for future students. I agree with much needed upgrades to the campus. I know it can be costly to restore and upgrade the R building, yet I think the loss would be much greater. As our community changes we deserve to uphold moments of pride in our history. Our community had deep roots in standing up for justice. Currently of the places preserved there is an inequity when it comes to preserving the history of communities of color. LAUSD and out state had a minority majority population. We deserve to have our heritage passed on from generation to generation. While it seems that this issue is a local issue I would argue its much larger.

The students walk outs not only help provide context to a moment of history but the struggles continue to resonate with communities across our country. I remember being a student on the tracking system, a student who was loosing interest in school and with little knowledge of my heritage. I was pulled back into school when I learned about the Chicano movement. As I learned how ordinary people just like at my school took action to improve their lives I was positively impacted. It will forever be with me and continues to guide my choices.

In fact I think of many great schools in our country part of their legacy is their history. It is our right to have our history protected. In fact I think that as the school is upgraded there are opportunities for interpretative signage and online connections that bring history to life and a connection with current students. I think we deserve both upgrades to prepare students for the workforce of tomorrow and a grounded perspective of our communities struggles and success over time. The Latino Community is a force, youth are a future of our economy and democracy. Schools play a key role in preparing students to be good citizens and contribute to our society. Have relevancy to a student makes this easier. I know students especially teens are looking for inspiration, what better inspiration that such a significant movement at their own school.

Please consider that loosing the R building may save money in the short term, yet it would be a invaluable loss over time. Like the students choose to stand with justice and equity, preserve the R building and restore that Japanese Garden.

-Laura Torres
class of 2003

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:)
SMILE

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Letter No. C50: **Laura Torres**

torresla07@gmail.com

Response C50-1

The comment provides information regarding the historic nature of events and buildings on the Roosevelt campus, along with personal reminiscences of campus life, and a statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Peter Tuite <petertuite@hotmail.com>
Sent: Sunday, March 11, 2018 11:51 AM
To: Paek, Edward; rsagara@laconservancy.org
Subject: Roosevelt High School

Hello,

I have read, with disappointment, about plans to demolish Roosevelt High school and replace it with a new building.

I understand there are costs associated with preserving the old building but you must understand the historic and architectural importance of the old building. If you destroy it you are destroying part of our history and culture with which you are responsible for preserving,

Please I urge you to keep and renovate this important building.

best

Peter Tuite

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Letter No. C51: Peter Tuite

petertuite@hotmail.com

Response C51-1

The comment provides a general statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C52

**Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt**

Name / Nombre: Kasey Ventura

Affiliation / Afiliación: _____

Address / Dirección: _____

Comment / Comentarios: As a member of community, I am here in support of the project for the benefits of the students. It is very hard to give the best to students. An issue that we have been fighting for for as long as I remember. This is a fight that we are facing on a daily basis for the history project. This is what

Written comments must be received no later than **March 23, 2018** at the following address:
Envía su comentario antes de 23 de marzo 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

1

The needs of the students. I understand the history and it has inspired me but the demands of the 1960s walkouts are being met now and we're stopping because of another? we keep our history by passing on the spirit to the students and the best that's possible.

Letter No. C52: Kasey Ventura

Community Member

Response C52-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Vickie Vertiz

Affiliation / Afiliación: Promesa Boyle Heights

Address / Dirección: 135 North Mission Rd., LA, CA 90033

Comment / Comentarios: Dear LAUSD:

We write to express our support of the proposed Roosevelt High School Comprehensive Modernization Project, scheduled for completion in 2022. Our families and student cannot wait. We are also glad that this project will potentially honor this school as a site of the '68 Blowouts.

We underscore the importance of the Project as it relates to safety and access.

Written comments must be received no later than **March 23, 2018** at the following address:

Envia su comentarios antes de **23 de marzo 2018** a la siguiente dirección:

LAUSD Office of Environmental Health and Safety

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: Edward Paek

CEQA-comments@lausd.net

The facilities will host state of the art access to technology, feature larger classrooms, and bring the buildings up to earthquake ^{damage} prevention codes.

We commend the district for its deliberate inclusion of community input, including 21 feeder schools, community partners, alumni, community members, and students. Along with Inwee City Struggle, Promesa Boyle Heights has engaged in the planning of the Project and support the modernized art facilities that will be constructed on the RHS campus.

We are eager to support the modernization of RHS, particularly during the 50th anniversary of the '68 Blowouts.

Sincerely,

Promesa Boyle Heights

Letter No. C53: Vickie Vértiz

Promesa Boyle Heights
135 North Mission Road
Los Angeles, CA 90033

Response C53-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: GABRIEL VIDAL

Affiliation / Afiliación: INNERCITY STRUGGLE

Address / Dirección: 530 S. BOYD AVE LA, CA 90033

Comment / Comentarios: RHS MODERNIZATION PROJECT HAS BEEN LONG OVER DUE. THE BOYD HEIGHTS COMMUNITY HAS ALWAYS REPRESENTED EDUCATIONAL & CULTURAL RESILIENCY, SUCCESS & INNOVATION. THE PROJECT REPRESENTS & SHOULD CONTINUE TO EMBODY THE PROGRESS & VALUE OF THE BOYD HEIGHTS / ROOSEVELT H.S. COMMUNITY. THE MODERNIZATION PROJECT SHOULD MOVE ON WITHOUT DELAY & SHOULD CONTINUE TO BE A COLLABORATIVE PROCESS WITH THE YOUTH & COMMUNITY OF RHS / BOYD HEIGHTS! THANK YOU FOR YOUR WORK!

1

Written comments must be received no later than March 23, 2018 at the following address:

Envía su comentarios antes de 23 de marzo 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek
CEQA-comments@lausd.net

Letter No. C54: Gabriel Vidal

InnerCity Struggle
530 S. Boyle Avenue
Los Angeles, CA 90033

Response C54-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Los Angeles Unified School District
Office of Environmental Health & Safety

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (DEIR)
Roosevelt High School Comprehensive Modernization Project
Borrador del Estudio de Impacto Ambiental (DEIR)
Proyecto de Modernización Integral de Preparatoria Roosevelt

Name / Nombre: Rosa M. Zambrano (maiden last name Gomez): _____

Affiliation / Afiliación Former Student Graduated class of 1970: _____

Address / Dirección: 5604 Mission Way Commerce, CA 90040 _____

Comments /Comentarios: I am very excited to have graduated from Roosevelt High School in 1970 and remember an old gym's basement dressing/shower rooms were dark with old fashion gutters to drain the water from the showers. We had driver's training in trailer classrooms and remembered an old cafeteria. In my personal opinion I don't remember anything historic about RHS that needs to be preserved. I have great memories of teachers and fellow students and the cafeteria manager. I have attended some Roosevelt class reunions and enjoy the Roosevelt high school spirit with friends my heart is still part of Roosevelt High School spirit.

I like the idea of a modern school, with plans to leave the Japanese garden, kiosk, band stand etc. Therefore tearing down the R building and making room for a state of the art bldg. if budget is available to make it a reality and making it better for the new generation of students and future leaders to be able to enjoy new building with modernized classrooms that students will feel safe.

Appreciate that you asked the public to submit their opinions and know that I also respect others that work to preserve history

Sincerely Rosa M. Zambrano

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Written comments must be received no later than March 23, 2018 at the following address:
Envia su comentarios antes de 23 de Marzo, 2018 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Edward Paek

Email: CEQA-comments@lausd.net
Please include "Roosevelt Comp Mod" in the subject line
Incluya "Roosevelt Comp Mod" en la línea de asunto

Letter No. C55: Rosa M. Zambrano (nee' Gomez)

5604 Mission Way
Commerce, CA 90040

Response C55-1

The comment includes statements in support of the proposed Project.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Letter C56

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre: Maria Zavaleta

Affiliation / Afiliación: community member

Address / Dirección:

Comment / Comentarios: Hello, my name is Maria Zavaleta, I am a United Student leader from Parkfield HS. I am ~~here~~ representing sandy Gomez. Who comments "I am ~~in~~ drill & we are asking for a dance room since we are forc^{ed} to practice in the cold/hot weather. We want to be the best we can be - but we struggle so much b/c of the amount

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333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: Edward Paek

CEQA-comments@lausd.net

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of support we get which isn't a lot."

own opinion: I believe that students who are passionate about their activities should have the priviledge to practice under a roof. ex; football players have their fields.

What do these amazing dancers have?

Keep it into consideration.

- thank you for your time.

Letter No. C56: Maria Zavaleta

United Student Leader
Garfield High School

Response C56-1

The comment requests the inclusion of a dance studio the proposed Project.

The proposed Project would include a new Auditorium and Performing Arts Building. This new 1-story approximately 35,000 sf building would have an auditorium and classroom spaces specifically designed for performing arts, including music, dance, drama, and choral arts, etc. This building would generally be located on the site of the existing athletic field on 4th Street and the gymnasium (Building #19).

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

COMMENT CARD / TARJETA DE COMENTARIO

Draft Environmental Impact Report (EIR)
Roosevelt High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Preparatoria de Roosevelt

Name / Nombre:

Affiliation / Afiliación:

Address / Dirección:

Comment / Comentarios:

1: Aunque por lo entendido no está autorizado el proyecto, hasta una evaluación final después de la autorización cuando empezaría el proyecto.

2: De acuerdo a la distribución de los espacios ó proyecto, hablando por parte de la educación adulta

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No vimos ningún área destinada ó dirigida hacia nosotros, por lo que se creo la incógnita de si continuara o se terminara la impartición de la educación hacia nosotros. Aunque llevo poco tiempo viviendo en esta zona algo que hace interesante la instalación es que imparte educación sin importar el público hacia quien sea dirigido (niños, jóvenes, adultos) y a pesar de que la construcción es modernista y que es dirigida hacia la juventud que en un futuro pueden llegar a ser dirigentes, o personas que sean un emblema para los Angeles, también tienen que recordar las raíces de las cuales provinieron.

"LA EDUCACION ADULTA ES TAN IMPORTANTE COMO LA DEMAS, YA QUE SON LOS PADRES UN PILAR DE SUS HIJOS".

TRANSLATION

Name: Norberto Zuala

Affiliation: Adult Education

Comment: 1. Even though I understand the project has not been authorized, until a final evaluation after the authorization when the project would start (sic).

2. According to the project distribution or that of the spaces, speaking on behalf of [those in] adult education

we did not see any area destined or designed for us, which raised the conundrum of whether education for us will continue to be taught or will come to a halt. Although I have not lived in the area for long, something that makes the facilities interesting is that it provides education regardless of the public for whom it is geared (children, youth, adults) and even though the construction is modernist and geared toward the youth, who might in the future be our leaders or people who may [become] an emblem of Los Angeles, you must also remember the roots from whence they came.

“ADULT EDUCATION IS AS IMPORTANT AS THE REST, BECAUSE PARENTS ARE THE PILLARS FOR THEIR CHILDREN”.

1

2

Letter No. C57: Norberto Zuala

Adult Student

Response C57-1

The comment requests information regarding the construction schedule for the proposed Project.

Construction activities are anticipated to begin in Quarter 3-2018 and will be substantially completed in Quarter 4-2022.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response C57-2

The comment raises concerns regarding the location of the Adult Learning Center.

During construction and following the proposed Project, the campus will continue to provide administrative space and shared classrooms for the Boyle Heights Adult Education School. The adult school only functions during evenings or otherwise outside of regular school hours.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Paek, Edward

From: Judy Branfman <branfman@ucla.edu>
Sent: Monday, March 19, 2018 2:14 PM
To: Paek, Edward
Cc: rsagara@laconservancy.org
Subject: Writing in opposition to The Roosevelt High School Comprehensive Modernization Project

Dear Mr. Paek,

I am writing to express my opposition to your plan for the The Roosevelt High School Comprehensive Modernization Project, as currently proposed by the Los Angeles Unified School District.

Students deserve the safest and high-quality school facilities possible and I think it is very possible for LAUSD to provide safety, quality education, *and* historic preservation -- it's been done before and can be done again. It is not an "either/or" choice.

Demolishing and replacing almost all of the historically and culturally significant buildings on the school campus, including the original Auditorium and Classroom Building (1922), also known as the "R" Building, is not an acceptable option. This is an historic building where many important events have take place. In addition to the 1968 walkouts, there were many activists, including my relatives, at Roosevelt in the 1920s/1930s, whose activism led to a precedent-setting free speech decision in 1931 (*Stromberg v California*).

Roosevelt was for many years the city's most diverse high school – and is now a proudly majority Latino school. These histories are critical to how LA has become the city it is and the buildings are part of that history. The buildings are classic 1920s architecture and should be honored and preserved. Los Angeles has a shameful history of destroying its historic sites, which should be used by LAUSD as teaching tools. I hope that you will work closely with the LA Conservancy and all the Roosevelt High School stakeholders to find a better solution for revitatlizing Roosevelt High School.

Sincerely,

Judy Branfman

Judy Branfman
PO Box 5351
Santa Monica CA 90409
Research Affiliate,
UCLA Institute for Research on Labor and Employment
branfman@ucla.edu
310.392.2076

Letter No. C58: Judy Branfman

branfman@ucla.edu
P.O. Box 5351
Santa Monica, CA 90409

Response C58-1

The comment provides a general statement in opposition to the Project, due to the historical nature of the campus buildings.

Refer to **Topical Response 1: Responses to Comments Supporting Alternative 2** regarding concerns related to historical cultural resources.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

AUDIO FILE: "RHS CEQA-DEIR Mtg 2-21-18"

Total Duration: 2 hours 9 minutes and 6 seconds

Transcription needed for: 1 hour 25 minutes (starting at 46:40 mins)

Ed: So now we're gonna get to the heart of the meeting which is the public comments segment. We know there's a high level of interest in the community regarding this project, so we want to invite those present here tonight to provide comment on environmental issues that were addressed in the draft EIR. In order to hear as many of you as possible, we will be limiting commenters to two minutes. We'll have a timer pop up on that screen. We also remind everybody that we have a court reporter present who will transcribe your comments which will then be included in the final EIR that is presented to the board of education. We understand that there may be some non-SEQUA-related questions, so just questions on the design, operations, educational program, but tonight's meeting is, you know, we'd like to focus on environmental concerns. However, members of the team will be available after the meeting to address any of those types of questions one on one. And please forgive us if it doesn't seem like we're responding to your questions or comments, we're not ignoring you, the primary purpose of tonight's meeting is to listen to your concerns on the draft EIR. And we might not have the answers tonight, but if you provide your comments, in writing, they will be addressed in the final EIR. So, at this point I'll turn it back to Ford to help us begin the comment segment.

Ford: Thank you, Ed, I appreciate that. So, we're going to have, I know that while our projector wakes up here, we're going to afford everyone two minutes, so we can hear from all of you that want to come up and offer us your comments. And we should be up and ready in a second, I think we are now. And if anyone – now having spent four of my formative years in Boyle Heights, I know that Boyle heights does not have any bashful residents. I can assure you of that. But if any of you are bashful, we do have that little comment card that you received at the registration table. So, we're going to have two lines, one towards my right along that corridor right here, and then here one towards my side. I have the privilege of—oh yes, and then we want to make sure everyone who is not bilingual has a headset. In the event that you don't if you would please raise your hand so one can be afforded to you. And I know they refer to themselves as interpreters, but I really call them magicians for turning us into bilingual individuals. I'd like to thank Uri Lavay and Virginia Wilson for having everyone follow this meeting today sw- effortlessly. Thank you so much. So, we're going to start on my side, and I have the privilege of introducing to you, someone who has a long trajectory of working on behalf of the Boyle Heights community, the honorable Richard Alatorre.

Richard: I will make my comments brief. But I'm here to finally see the progress that's taken a long time for it to come about. Recognizing the importance of the history of this high school; I happened to have graduated from the other high school, but the people in Boyle Heights gave me the privilege of representing them for over 30 years. Both as a member of the legislature and a member of the student council. Roosevelt High School is so important to this community. And I think that it's unfortunate that I never was able to see this day while I was a public operative because Roosevelt deserves its long overdue renovation. It deserves to become part of the importance of all of the opportunities that are being provided to students throughout Los

Angeles, and many of them were not provided to the people here in Los Angeles- here in East Los Angeles. And I'm glad that you're here to listen to the people that have an interest in the progress of Roosevelt High School and to recognize that finally there will be an investment made here in Boyle Heights to improve the opportunities of students in this area. And I commend the school district and I commend the _____ board for having this hearing today to listen to the interested people. I think that—you know, it's taken a long time, but finally we're here, and hopefully that we will make it. Thank you very much.

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Ford: Thank you so much for joining us this evening. So, then we'll take our next comments from that section.

Gypsy: Hello everyone, my name's Gypsy [inaudible], how's everyone doing? Alright. Well I'm glad to hear. I am a resident of Boyle Heights, and I'm not only a resident, I work in the Boyle Heights area/East LA area, so I do civic engagement and I just want to tell you I am going door to door, talking to our community and they have lots of concerns of the future for our kids. Not only that, but of the safety, and the quality of education. So, I'm here to tell you first-hand that the kids are outside of my house and I asked them, why is this important to you, or do you even know that this is happening? And let me tell you a lot of them don't see any future in their education and the quality of education that they have. And when I seen that virtual tour, something in me just awoke, right? It was like a feeling that, I, as a mother, because I have a 3-year-old, my daughter can partake in all of these new 21st century opportunities. For her to exercise any talent that she has, so she can be part of a career, and the workforce of the 21st century so I ask you guys to make a rational decision, and start looking forward because change is very scary, but it's very _____ as well, thank you very much.

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Luanda: Hi, my name is Luanda Diaz and I'm a nurse who lives here in 4th Street. I see several cars every day that speed. Bodies that have been dragged. Fortunately, not killed, some dogs that have been killed, drive-bys, there's a reason why our founding architects didn't make 4th Street an entrance. Not only are we surrounded by tons of freeways-- safety, you've said we were all about safety. I also have been—Catholic, private education, and one of the oldest schools in LA doesn't have \$173 million to make Loyola High School a brand-new school. However, they work with what they have. And we have a lot of tradition, we have diversity, we have a lot of people that have come through this school. And I think that let's see what the people need. If you're in the business of educating our children, do that. Leave the wellness centers to the hospitals. We have an amazing facility here up the block, we have an amazing wellness center that no school will ever be able to match against. In addition to being a nurse in the hospital, I worked for LAUSD for four years. And I saw the culture there, and the waste of money, I could not be part of that. I thought I will come back to my community and start planting seeds everywhere else. I live at the corner of Camulos and 4th Street, in a building that has been there since 1900. Right next door is my little market, it's been there for 79 years. Do you know how many architects came and told me, knock the whole thing down? Combine your property, that's a commercial property, and let's build up, we'll give you money. I said no. I protect Boyle Heights, for all its loveliness and its buildings and everything that it's offered us who grew up here. So, I say help us keep our children and our 4th Street safe. Thank you.

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Ocho: Good evening everyone, my name's Ocho Ramirez and I'm a senior here at Roosevelt High School, and I definitely want to speak out in support of this project. I know that I've heard a lot of students talking about it, there's been a lot of concerns outside of the Roosevelt community, I know that some are afraid that a lot of the preservation of the Roosevelt culture, a lot of the legacy will sort of be diminished once the project is finished, and in regards to that I do want to point out that while this may be sort of a grand threat, I also do want to recognize that it's important to recognize the students and our concerns over a quality education. I know that some people have even pointed out that the East LA walkouts or something that's important to preserve as part of the history here in Roosevelt, but you know when you look at the context and the demands they were making at the time they were demanding better resources or demanding larger classrooms and I hear students speak about it I know that there are a lot of students that are afraid that the classrooms are really small and not necessarily accessible to all there's not entrances for people with wheelchairs in areas of our building. And aside from that, this project will definitely bring a lot of internship opportunities, and if we delay that, I think that we're really delaying a quality education for all of our students here at Roosevelt. And I also want to point out that a lot of the community members have gathered up, we've raised about 800 petitions that have been signed by just Roosevelt community members, students, and of those 800, 184 were _____. So, can we get a round of applause cause [inaudible].

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Ford: We're going to take a question from this section. But before proceeding, I want to make sure that all of you that are here signed in, since I noticed that our attendance from our town hall on the 3rd, doubled, so I want to make sure that I continue to engage you and keep you informed, especially as we move forward with this particular proposed project. So, make sure you sign in.

Miguel: My name's Miguel Guerrero, I actually lived here in Boyle Heights in a foster home, 50 years ago. Later on in 1968, Saul Castro was my teacher at Belmont High School, we had the walkouts, and I met him before he died, I got to talk to him. And one thing he said, when I look around, [inaudible] in the house here, ok, building the structure that you have here that they're contemplating eliminating, I really think they should maintain the exterior, the structural integrity because it's an historical element of what that meant – that was a coming of age for all the students that enabled me to dream, to go to college, I became the first Latino suicide investigator in Los Angeles County. And I've been successful, this all came because of Roosevelt, Belmont High School where I attended, Garfield High School, they made a difference. I was contacted just very recently about the building here [inaudible] it is so significant, that's our building. That's part of our culture. That was our coming of age and if that building is demolished, part of us is going with it. You can't let that happen so that's why I came tonight I just had to be here.

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Maria: Good evening, everyone. My name is Maria Louise and I am a resident of the community here in Boyle Heights and have been for about 20 years. I am also a member of the Parents of United Families Organization, and I'm here right now advocating for the project that they just finished presenting to us- it's excellent, fabulous. My son just graduated this year from Roosevelt High School and now attends Ohio State. During the four years that he was here, he told me about the many needs that the school has. They didn't have enough technology, laboratories, they had a lot of problems doing activities in the school. In our community now. Our community now is an excellent one, rich in culture and treasures. We will never lose that

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because we keep it here inside us. And they've presented a project to us that will preserve things that will show us the culture that we have in Boyle Heights. So, I ask that you continue with this project, because it is very very important to all generations. I'm sure that my grandchildren will come to this school. And they will have access, because what they have now, is not enough. Children with special needs that don't have access to this building. You all know, because they don't have access. Many needs. So, for this reason that it's important that we reach that level – as they say “the 21st century”, right? We must get to that level because [inaudible] deserve it, because our kids deserve it. The future generations will benefit from this great project. Thank you very much for listening.

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Ariana: Hello everyone, my name is Ariana Fernandez I'm a senior currently in [inaudible] at Roosevelt High School. And I'm here to speak about the renovation project because I strongly believe our future students deserve the best resources and education they can get. And with this project our students are guided towards a future of possibilities and development with new implementations of the wellness center which we've never had before which I've never had any kind of situation to actually be a part of but I'm really excited to see our future students be a part of. With new renovations it shows our students they're being taught in an environment that cares about them and supports them to get them ready for college and to get them ready for anything life might throw at them. Not only will they be helped academically, they'll also be helped outside of school with plans to build a wellness center, which I feel shows a sincere commitment towards the future generations of Roosevelt High School. Thank you.

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Exatiana: Good evening everyone, my name is Exatiana, I am a mother volunteer here at Roosevelt School and I've had six kids graduate from here. Two attend universities, one in their third year and one in their second year. My granddaughter goes to school here. I agree with this project for the Roosevelt school, because I think that we need it now. We need our kids to feel up to date with technology, with physical education. We also need that our kids and grandkids and the next generation feel free and safe in our school. This is my school, this is my second home, and I invite all of you, when the project is done, come and see it, so you can see that it's been a good—how do I say it – a need that the school has. Because our school has needs. Both the regular kids as well as the children in special education. I also want to talk about the 800 signatures that we collected, more than 500 of which were from students that are currently in school. 150 are from parts, and 100 or more are from ex-students from _____ in our community. I've been in the Boyle Heights community for 28 years. And I look, and I see that our school needs this great project, this great modernization because we are in the 21st century, and our kids need new technology to get ahead with a quality education. Thank you.

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John: Yes, my name is Dr. John Fernandez, I taught here at Roosevelt High School for 24 years. I was also a lead teacher here in the Social Studies Department. I was also the director of the Mexican American Education Commission for the Los Angeles Unified School District. I'm here because I want the best facilities for our students, for our parents, and for the community. But, I also want maybe a museum, or a monument be placed somewhere on this campus. Too many great people graduated from this school, too many famous people, and a lot of great students. Don Sterling graduated from here. Willie Davis graduated from here. Mike Garrett the Heisman Trophy winner from USC, played professional football, graduated from here. Lou Abner graduated from here. Culian Nava graduated from here. He was on the LAUSD school board.

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And also, the late great Ed Roybal graduated from here, the first Mexican American congressman ever. So, there should be a commemoration, something, a monument, something, we can't just tear it down. There has to be something. But I'm here to also to support the needs of our students. I'd like to also let the community know what's happening here academically. Now, I don't know if a new school is going to increase the student achievement. I don't know if that's guaranteed. I know Mendez is doing very well, they're a new school, but there are other schools that aren't. I just want to give you a little snapshot of what's happening here. Lincoln High School, Wilson High School, Garfield High School, all have higher academic scores than Roosevelt High School, which is a partnership school. Also, the statistics on the last standardized tests, only 39% of the students are proficient in English, 10% are proficient in math, and only 28% are proficient in science. So, we really have to improve that student achievement. We need money, there's \$173 million going to the school. But we need money also to increase that student achievement. We need bilingual psychologists, there is no bilingual education program at this school believe it or not. We also need full-time nurses, and we need more _____. We need the money for that, not just for the school. Thank you.

Ford: Thank you Dr. Fernandez, if we could please have you adhere to your two minutes, so that everyone can have an opportunity to address. Thank you so much we appreciate it. And then please state your name.

Magdalena: Hi Everyone my name is Magdalena Ceja, I'm currently a Roosevelt teacher, but I'm also a born and raised Boyle Heights Resident. And I actually came to Roosevelt too, I graduated in 2011, and sometimes, as I'm hearing these comments, or these comments being made, I think it's very easy for people to comment from outside the school, but when you're inside the school every day, it then becomes an issue of inequality, right, who has – are we providing our students with an equitable education? For those of you that are here on a daily basis, you know there are falling ceiling tiles in our building, there's faulty outlets- My outlets went out one day when I was teaching and so I – I rely a lot on technology, so I had to find a way to teach my lesson without it. There's mice in the building, there's leaking on the third floor, there's a bucket there that's always there. There's students with disabilities who are limited to what classes they can take because there's buildings that don't have access for students with wheelchairs. And there's earthquake concerns- We live in California – earthquake country, so I feel like we can have a building where our students feel safe to be at every day. And when I think about this I think that we're fighting for this, are we not worthy enough to have a campus that benefits the needs of our students? In 1968 students walked out to demand equitable classroom spaces and are we going to ignore that demand for the sake of a building? Also, one final question I want to ask is, how can we expect our students to succeed in the 21st century world when they are stuck in facilities from the 1900s. Thank you.

Wilfredo: Good evening, my name is Wilfredo Lopez. And I have been an activist father for more than 30 years in the Los Angeles School Districts. I've lived in Boyle Heights for 58 years. We lived here in front of the pool, my kids were born here, here they graduated from Hollander, Roosevelt, and [inaudible]. It's a shame what this school has become since the partnerships have been involved, as well as the organizations. They are declining in areas of assistance and drop-out prevention. Parents tell me that they don't even have English classes for parents at this school. Ma'am, they've just now told me to come and speak, that's what they told me. I remember this

school in 1964, when there were Community Service Organizations, and Cesar Chavez came to recruit students to this organization. Among these students was my wife who graduated [inaudible]. All my kids graduated from here. And I don't see that they have 1,200 or 1,300 students when this school had 5,000-6,000 students, Hollander had more than 2,000, Boyle Heights—it was a small city. The scores to graduate from High School in those days was 230, and they lowered them to 210. What does that say? When the students go to get into universities, they won't be able to because of how low their scores are. Please, I remind you all of the struggle _____ [1:11:35] and since they were advised along with Snyder, who is going to supervise this school when they convert it to a charter school? If they kick out all the Roosevelt students, to other schools, where are those other students, that they bring from other communities, from outside, to convert it to a charter school, that discriminate against students with special needs and learning problems?

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Ford: Thank you so much. And thank you for conforming to the two minutes. I don't want to be the bad guy, reminding you that the two minutes it up, so, thank you. Two minutes.

Carlos: Hello, my name's Carlos Castillo, I'm a teacher here at Roosevelt High School. I've been a teacher here for 12 years, I was also previously a teacher at Stevenson, for seven years. I'm also a proud product of LAUSD. I wanted to talk about a couple of issues, segway into a couple of things. First thing is this idea that, what I see of community neglect, I look at this immense space and I'm awed as well, I think it's an awesome space, but this building as been neglected for a long time. And I wonder if it had been in a more affluent part of the city or LAUSD, if it would have been allowed to be neglected this long or deteriorated to this level. And I want to say that it probably wouldn't have. But to not have the plan, the project go as planned in my opinion is to not only add insult to injury but insult to injury to injury to injury, because you know the history of inequitable education at Roosevelt historically. There's also this issue in the community that my students are talking about gentrification, talking about whitewashing- I was quite surprised to find out that the LA Conservancy is somewhat spearheading the project to preserve our building. Once again, a little bit of gentrification, the outsiders telling the community what's best. I think that the new building is something that the students deserve, it's something that students have fought for, even in the 1960s walkouts. It's something that would provide one of the final pieces to accomplishing those demands. My students often don't imagine that they deserve a place like that, but I want to tell them that they do, and that they're going to be able to experience that as community members in the future. So, we support the project, and I hope that you will too. Thank you.

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Allison: Hi, name is Allison Pereira, I'm a senior here at Roosevelt, and I've been in the community for more than 10 years. I see that there's a new project going on and I really feel excited about something going on in our community because there's not a lot of times that we get this amount of money invested into this school. I enjoyed the video and I see that it really excites a lot of my classmates and other peers. However, I don't see a lot of the students here, I understand that it's a community event, it's going to impact the community, but it's more about the students who really come here that are here every day. And why couldn't this meeting be during school hours when students are actually here? I doubt that though our parents know that—the communities know—the teachers and the students are here, wanting to learn and wanting to do stuff, that our buildings are deteriorating. I see it every day when I

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come, I see students be embarrassed of our school, and that's the least I want to see. And this is really exciting, but how come it's taken so long? And I want to really welcome you back into the space, come back into the space and actually talk to our students, come during lunch, [inaudible], come and actually interact with students, ask them what they want to see. The design is really cool, I really like it, but I didn't see any of my peers say yeah that was my idea, they didn't say yeah that's where I wanted it to be, you know, they just said cool. And I think that's not enough, we really need to see students come up here, talk with us, you know, have a conversation, tell them you know what, we see your gardens, your monuments here are really important, where would you like to place them? How would you like to see the school? And I want to see a lot more now that the design project is coming on, and even though we—thank you.

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Ford: Thank you so much. I counted on both aisles and we have 20 folks in this aisle and 20 folks in that aisle, whoever is in line as of now is going to be allowed to give comments and address, but just want to make sure and that would take us up to the closure of our meeting, just past 8 o'clock. But I want to keep my pledge to you, to get you on your way home slightly after 8, so anyone that's in line now, will be on the microphone shortly.

Yolanda: Good evening, my name is Yolanda Gonzalez, I'm the mother of four children, I have two daughters that graduated from Roosevelt, one [inaudible] from school, and the other graduated from elementary school. I have a son that's in 10th grade and for me, congratulate you all on the project that you want to do, I'm a mother that likes the project, and when I told my daughters, they're going to renovate Roosevelt and they told me 'wow, it's about time they should have done that a long time ago'. So, it's a shame because I've been here – I work nights, I start at 10pm, on my feet, I haven't slept, I've volunteered for four years, I've been at the building they want to renovate, and that building is a shame, truly. In my house I like that my kids study in a clean place, and as an environment, I don't need the place to be a 10 but I'd like it to be an 8 or above. I can see how they're going to do the renovation. I congratulate you, and I tell you to push ahead with the remodel don't let anyone stop this project because this project is the future for my grandchildren, it's a good thing, and for my other kid it will be something healthy, a better environment and for all these kids that are there now, some will enjoy it, some won't, but those that are on their way will like the school. No one should say that it won't work. For me, as everyone says, as the gentleman said, it's a shame, it's not a shame because just like how a new phone comes out everyone wants it, everyone wants to modernize, and it's always been that way. The time in which you all studied here have already past. Ok, thank you.

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Marlene: Hi, good afternoon, my name is Marlene and I'm a student here at Roosevelt. I'm [inaudible]. I really like the project that's being done, and I like the new engineering classroom and all that. But, like my previous friend here has said, I would also like to see you guys ask – have service for us, so we tell you what we would like to be done, not just what you already have planned. Yeah, it's nice, we like it, but we also want to be part of it. It's something I would like, to have the kids involved, the students here at Roosevelt. For example, [inaudible] out, stuff like that. Some things, and also the assemblies at school, so we can know more about it. Not just right now, how only some of us came, but so we can know more. Yeah, that's it.

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Jorge: Hello, my name is Jorge Lopez, I am a teacher here at Roosevelt High School, I have been teaching here at Roosevelt High School for 16 years, actually I've been in the R building for 16 years. So, I just want to share, what is it like to be in the R building? This is my experience on the daily, things that folks from the outside might now be aware of, I understand that there's pushback in terms of trying to keep our building. So on the daily, some of the things in terms of being in the R building, I have to be constantly sweeping mice droppings, this building is infested with mice and this is something that has been here since I've been teaching here. The AC always breaking down, imagine being in the classroom during the summer when the AC isn't working or when it is working and you have to have a bucket because the AC is constantly dripping. The square footage is tiny, and when I teach I like to be walking around and supporting my students as much as possible, but the class is so small it makes it really hard to support my students. Another thing too, even though these other conditions that are in the classroom I've tried to make it a more habitable place for my students. So, I'm very excited about the opportunity to have a brand-new building, a brand-new structure, I was showing the pictures to my students about the new school, and some of the students said, 'that looks like a white school'. And it was very sad to know that students have internalized this idea that they are not deserving of a new building, of a new school. And being an ethnic studies teacher too and constantly and teaching about the walkouts, and the 1968 dreams. These are these dreams of the students, this is that reimagined school, that they've been demanding. Do not bring any roadblocks into our school and into our community.

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Gavin: Good evening, my name is Gavin Glosio I am a senior at Roosevelt High School. And I was able to take classes in the R building. Even though I was part of the magnet academy I was able to take classes at that building. And every day I had to walk through it, during rainfalls and hot summer days, I noticed that sometimes in some classrooms the AC doesn't work and during rainfalls its dripping water. And also, the square space is really small too. And also I've noticed that the tiles from the ceilings have been falling, I've seen mice running around everywhere. But I also have a concern, it's a safety hazard, safe for earthquakes. Because one person also pointed out that we live in an area where there's constant earthquakes, it's not safe. And also, opposition coming from, 'oh, we should retain this building', as an historical monument, for the East LA blowouts, but, I don't think the building would remember the blowouts. But we should remember the people that fought for it, and we should really remember the students that fought for the system, back then. Thank you.

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Cindy: Hello everyone, my name is Cindy, and I'm a leader with United Students in Inner City Struggle. I don't attend Roosevelt High School, I go to Lincoln, but I am here to support the Roosevelt students, Boyle Heights, and this project. I am here to uplift and represent Angel Rios' public comment, that states, the community has been wanting this, and it sounds like a great one.

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Omar: Hello, my name is Omar Lopez and I'm going to be a senior at Roosevelt. I wanted to speak out on the modernization project, and why it matters to me. I believe that renovating the R building will help students of the future by giving more chances to learn and as someone that has two younger siblings that could possibly come here, I feel like it's important for them to have a space to be able to learn more and have an environment where they feel safe and accepted. On keeping the culture and protecting the history of what happened here at Roosevelt, I think the murals are kind of a good idea on how to do that, if they do it in the right

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way, kind of just showing the culture and history. An idea I had was that in the R building, when it gets renovated, there's going to be an opening, and in that opening, you have a walkway where students can walk past and going to the fountain. And I think that it'd be a great way to show the walkouts there by having a mural of people walking there, along the fountain, and progressively going into the future.

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Man 1: [inaudible], and I attend Wilson High School. I'm a student leader for [inaudible] for United Students. I'm here to represent [inaudible], which states, according to the presentation, the people of 1968 that participated in the walkouts, they asked for a modernized building.

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Maria: Hello everyone, my name's Maria Zabaleta, I currently attend [inaudible] High School. I'm not a student here, but I'm here to support everyone at Roosevelt High School. I'm representing Sandy Gomez's comments, I am in dance and we are asking for a dance room since we are forced to practice in the cold hot weather, we want to be the best we can be, but we struggle so much because of the amount of support that we get, which isn't a lot. My own opinion towards this is, I'm from East LA, we all come from low income, and this can not just benefit them, as students, but also the teachers, the administrators, and as well the parents. If you guys are going to provide the parents English, you guys can provide technology classes as well. Technology has advanced really well, and I feel like if you guys could also provide that to parents it could help them as well. We can see now how technology has come really far, there's detriment in everything else. If they are aware and have media themselves, it can benefit them as well. And this generation, I believe that students that are passionate about what they like to do, like these girls, that I read her comments, Sandy. Ok, let's use soccer as an example, soccer has a field, that's where they go, their home. How about for them, how about for the dancers? Where are they going to keep practicing? In the hot weather? When it's raining? I don't think that's fair. They should have their own dance room like soccer has their own field. Thank you, have a good day.

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Joseph: Hi, my name is Joseph Cruz, I am a United Students leader from Lincoln High School. I am representing Jose Ameloa, he believes that the R building should be taken down. I'm here because I support the modernization at Roosevelt. I believe that these new buildings will help the future generations.

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Cecilia: Hi, my name is Cecilia Silvia and I am United Students leader from Mendez High School. I am representing Roosevelt student Ariana Lopez, who comments, students deserve a modern school where we are in a safe environment. Thank you.

23

Alvin: Hi, my name is Alvin [inaudible] good morning. I am a leader from Wilson High School, and I'm here to represent one of the Roosevelt student's comments, that reads, students deserve a modern campus in order to learn more effectively. Not only will this campus look beautiful, but will also be safe, keep students safe in classrooms. And I couldn't agree more, because if you go back to the history of the 1968 walkouts, one of their demands was to have a new school. And so rather than living in the past and having an old building I think that it's important to move forward and build a new building.

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Joaquin: Hi, my name is Joaquin Gonzalez and I'm a United Students leader from Garfield High School. I am representing Matthew Tevez who comments, this will be good for the community, and it will be safe for the future generations. Thank you.

25

Enrique: Hello, my name is Enrique Rendon and I'm a senior at Roosevelt High School. And I'm here to represent a student named Valeria, who commented that to keep the project going, and do not halt. The teachers and the administration and [inaudible] are the beauty behind Roosevelt, not the unsafe, outdated, costly building.

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Ariana: Hello, my name is Ariana Romero, I am a junior at Mendez, I'm also a student leader from United Students. I just want to say that it's important to renovate the R building, because of all the safety concerns that the teachers and students and the whole community have, as well as needing new technology. In order to preserve the building, it would cost more than just building a new one. After all, a building does not teach us history, it's the teachers that do. Being an outsider that doesn't go to Roosevelt High School, I didn't know about the walkouts just from the building, I learned it from teachers and educators at my school, and the community as well. Thank you.

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Anthony: Hello, my name is Anthony and I'm a part of ICS, I go to Wilson High School, and say I support the modernization of Roosevelt, I also support it because I think it's important that students have the best environment possible at their school, to be successful and somewhere they feel safe, and somewhere where they don't feel embarrassed to go to because I keep hearing about how the students are embarrassed about the conditions, especially the R room, so I think it's important that it gets modernized so that they feel safe and proud of the campus. Thank you.

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Maria: Good evening, my name is Maria and I'm a United Students leader at Garfield High School. And I am here to represent Madison Arrenda, who said, I want future generations to have access to modern technology, that many may think is inaccessible even in a neighborhood like this. Thank you.

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Antonio: Hi everyone, my name is Antonio, I'm a youth leader at Wilson High School. And I'm here to read a statement that [inaudible] said, and she said, It's a nice layout of our future. And I agree with that. Thank you.

30

Diana: Good Evening, my name is Diana [inaudible], and I am a member from United Students and I attend Garfield High School. And I would like to- I'm so thankful for this, the renovation because I have seen the positive impact on my school, Garfield High School, which has a new building, which has brought a lot of opportunities for me, for example, me getting better grades due to the technology, so I am really happy to see Roosevelt High School, our rival school, to actually have the same access as we do. Thank you.

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Laura: Good evening, my name is Laura Bañuelos, born and raised in Boyle Heights. My family still lives in Boyle Heights. From a long history of aunts and uncles, of *timas* and *timos*, my brothers, my sisters, from Roosevelt High School. Now, let me tell you about my time at Roosevelt High School. I enjoyed history with Ms. Thompson, my math class with Mr. Lozaro, Spanish Mr. Lopez, and those government classes with Mr. Edmundo Rodriguez, who made an impact on me. Who told me to come back and give to my community. Who would preach every day,

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when you go out there and make it, you come back and give to your community. Now, that's what we're doing here tonight. Let me tell you about one other memory I have. The R building, 1987, October 1st. 7:40, 7:41 even, I don't remember everything. 3rd floor of the R building when that shaking began, when those lockers just started moving around and we looked at each other, in a panicked way. We went down on our knees, covered our heads, and when we ran out of that building back out onto the field, and everyone asked, where were you? We said the art building. And all they could do was stare. We thought that building was going to fall. That's the memory I have of the R building. Move forward, teacher, for 10 years at Green Street Elementary, 10 years that I knew that those students were going to come to Roosevelt High School. Let's move forward. Let's give all of our students a chance. Don't let the past hold us back. Let's get into the future. Let's give them a chance. Our students deserve it, our families deserve it, Boyle Heights deserves it.

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Woman 1: [inaudible] I am a United Students leader from Garfield High School and I will be representing a Roosevelt High School student Dana Diaz, who comments, we should knock down and replace the building with a more structurally sound one, for the safety of the students, which should be a priority. This kind of investment has been anticipated and demanded for a long time and we should honor the wishes of our students. Thank you.

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Cynthia: My name is Cynthia and I support this project. I am her representing a Roosevelt Student Francisco Livar, who said, I don't feel safe in the R building knowing that it might fall soon. Knowing that makes me feel really bad and also at Garfield we have a wellness center and all students and community members benefit from it and I know that people here will too.

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Loyola: Hello, welcome, my name is Loyola Felix and I am a United Students Youth leader at Mendez High School, and a proud Boyle Heights resident. I really do support this renovation at Roosevelt because it is much needed here, how in other schools around the heights. I'm really thankful for this investment. I am here to represent Roosevelt High School student Brandon, who comments, we need to change how the school looks, and for the safety of the future generations. Thank you.

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Axel: Hello everyone, my name is Axel, I'm a United Students leader from Garfield High School, and I'm here representing Guadalupe Galleras, a student here at Roosevelt High School. She commented that the building is not going to teach me or others, it wasn't a building that holds the history. The pipes are rusted, and broken, not to mention there are a couple of leaks.

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Belinda: Good evening everyone, my name is Belinda Campos, and I am with Public Health Advocates. For the past three years, my students, healthy teens on the move, here at Roosevelt High School, have attended every meeting that had to do with modernization and also went to testify at LAUSD board meeting on how they support this project. So, meeting with the youth and talking to them, we do have a couple of concerns and approvals that we want, for example something that came up in our meetings is the glass, our students, because of the shootings, believe that it should be bullet-proof. So, it's something that has been talked about, that's just a concern I want to bring up. But also, we want to make sure that the report, that's mentioned today, there's a water portion, water quality portion, we want to make sure that the [inaudible] that's next door, any [inaudible] that's still on campus, that's out, and we want to

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make sure that our students are involved in that process and that part of the report. So, I'm going to have some of my students talk about and invite you guys to a couple of our meetings.

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Veronica: Hi everyone, my name is Veronica Gutierrez, I've been a part of healthy teens on the move for four years now, and I'm here with Public Health Advocates. And I'd really like if you guys could come down to our next meeting, it's on Wednesday, at 3, so if you guys could please make it, it would mean a lot. And I just want to thank you guys for implementing the new hydration stations that you guys promised, you guys had already promised so, we're hoping to see them in the next R building and other buildings. [inaudible]

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Woman 2: [inaudible] student from Garfield High School, and I am here to represent Bionte Nokos, who is a student at Roosevelt. He comments, this modernization providing a more beneficial learning environment for students born in the tech era. Thank you for your time.

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Jorge: Hi, my name is Jorge Castaneda, I am a community organizer with the Coalition to Preserve LA, and first off, I just want to make it clear that at the Coalition to Preserve LA, we are fully in support of the best things that students can get, not just in this area of the city but throughout. That's just a fact, we also believe in community empowerment, and the best way to do that, in my 6-7 years of organizing, I've learned that listening and having access to facts, so I'd just like to very briefly, very briefly, dispel three myths that have been repeated time and time again this evening. This is not an either/or fallacy; it's not all or nothing. So, the mice droppings, I'm against that, the dangerous conditions of this facility, we're all against that. Alternative two, having spent a little more time looking at some maps and some renderings of what alternative two would look like, includes the entire campus still being modernized, and the R building being renovated, upgraded, made safe for earthquakes, fire safety, ADA compliant, everything. Myth number two, Roosevelt does not exist in a vacuum. Today, the average income is \$33,000 for a Boyle Heights resident, paying rent for a two bedroom in Los Angeles is \$3200/month, that comes out to \$38,000 roughly. So, we have to ask ourselves, with everything that's going on surrounding the campus, who is this school being built for? We just have to ask that because I don't know the answer. And finally, if I was to develop a school in France I would be sure to prepare a French report. So, we'd like to see that if we could, a full report in Spanish. Thank you guys, thank you.

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Clara: Hi, my name is Clara Velez, I am a United Students leader at [inaudible] High School and I am a Roosevelt High School Student, Winter Ramirez, who commented, in my opinion it would be nice to build it because we need a better, sicker building, and it would be nice to have new things to help our education.

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Zuma: Hello, my name is Zuma Melendez, and I am a Roosevelt alum, born and raised and have lived here for more than 40 years. I think we're all here for the same reason, and that is for what is best for the students. I think they deserve a modernized school, they do deserve that for a very long time already, but they also deserve to walk and be part of history and to continue that history with their own experiences. And the R building, it doesn't just only have sentimental value, it has historical value, it has almost 100 years of historical Boyle Heights history, and the history of Roosevelt is the same as the history of Boyle Heights. I don't know, but a modernized school, the R building is included to be modernized also. We're not saying that we're not going to modernize it, they have to. So, I just want to emphasize that the students also need a lot of

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inspiration, and there is nothing like having a building that has been around for 100 years, modernized, of course, to emphasize that experience and learning. It is just so monumental that it is just a shame that we don't protect it and conserve it. So, it's just, for all the people here, it's not just—

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Ford: That's why I asked that everyone that isn't bilingual to ask for a headset, so everyone can follow along so thank you for your comments.

Francisca: Hi, my name is Francisca Alma, I'm part of the Boyle Heights community. My children studied here. I would like for them to leave the R Building, it's an historical building and I think that it can be fixed. I think they should think about that. Thank you.

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Maria: Good evening, my name is Maria Leon and I'm a Mother Leader from Boyle Heights. I was involved with the construction of the Estrada Towers, and I was also involved in the building of Mendez. They are now in operation, with great success, Mendez as well, I know that when there are changes there's always obstacles, right? I agree that the history should stay but it can be broadcast on the walls of the new buildings. Other than that, the history here, buildings don't teach the student as a young woman just said here, that's a key concept, a building doesn't make the student, but the student, the parents, and the community make the building. And we can broadcast that story here on the walls so we don't forget. And I just want to say to the young people, I'm motivated that young people have good ideas, here we can start that story, putting it on the walls. You have the vision, and I'll tell the young people, the parents, the residents that have their children here in Boyle Heights, never let them take the dream of having a new building away from you. Your kids, and your kids' kids deserve it because they live here in this city, and no one will take it away. We want a safe building for our kids, to make history, because they deserve it. So, congratulations to all the young people, the parents here, they will not take away our rights that we deserve. Thank you.

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Nicolette: Good evening, my name is Nicolette Morales, I'm a proud Roosevelt alumni, and have a long family lineage since winter of 45. And I'm proud to know that our community is embracing this, to some extent and there are some areas of my concern. One of which is there needs to more than a nod to the façade of the structural integrity of this place that we call an R building. I think there needs more than that. I think that my family that walked out and sacrificed their time, energy, blood, sweat, and tears to have an education, I think there needs to be more than a nod. My second concern is having the entrance on 4th street, when I drive down there, when I walk down there, when I ride my bike down there, it's a very big concern and I don't want my children entering from the 4th Street entrance nor would I want any of my students. My third concern, that my colleagues have shared, is that if there is an internal threat on our campus, which hopefully there never will be, but should there be, what kind of safety precautions are we taking? And my fourth concern, is more of a recommendation for the murals that will be installed, if we can look for local community minority artists to help fill those. Thank you.

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Maria: Good afternoon, good evening, my name is Maria Prevez and I work with Inner City Struggle and have been proud to be part of the Roosevelt community for almost 25 years. In a time where Roosevelt has the most overcrowded school in the nation, where students saw a school to jail pipeline, not a school to success pipeline. So I just want to congratulate all of the individuals that have made up the history of Roosevelt High School from the '68 walkouts that

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inspired the young people of the 90s, today to fight back against the low expectations of our students here in Boyle Heights, and to congratulate the school and the community for ensuring that after so many years, LAUSD finally brought reparations and investing \$173 million into the campus. We will do everything that we can and working with Roosevelt to ensure that the history, tradition of the walkouts and beyond is preserved and that students understand the legacy that will be a part of them, and that this new campus is a part of that legacy that was started in 1968. Thank you.

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Roslyn: Good evening, my name is Roslyn Sibarra and I'm with the Los Angeles Conservancy. I just want to say a little bit about our organization because some of the comments that some people made earlier that maybe we don't have a say, or we don't have a voice on the issue. We work alongside residents across the county, to preserve and revitalize places that matter in our community. That includes schools, churches, houses, libraries, places that really made a difference in people's lives because historical events happened there, because important people passed through there, and we have found in talking and working with hundreds and thousands of people across the county, that places matter. And I invite anyone who wants to know more about the Conservancy's work, to meet up with me because I'd be happy to tell you how I would love to partner with you at some point. There's a couple of concerns that I wanted to raise. We have raised this directly with LAUSD, we've requested seismic studies, and we're trying to better understand the calculations that you've been using to make determinations about what is and what's not possible with regards to our building. As many of you have read the documents they're quite technical, so I think that if you can give us some guidance as to where that information is, we would really appreciate it. Second is, modernization is definitely needed, we think that can happen, while also preserving important Boyle Heights and Los Angeles history, this isn't an either/or thing, and we could really use some maps or visuals to really better understand your analysis of the alternatives. You've presented four alternatives, and I think the public and we are interested in learning more about what that looks like. What does the new construction look like with also a rehabilitated R building. Thank you.

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Antonio: Good evening, my name is Antonio Avillar, and I'm a parent. I just wanted to say that I never went to school but I've learned through the years that God has given me, I know a little bit about construction, what I do want is when building or rebuilding, because there's two things that one has to do whenever you want to build something, the principal base that you're going to follow, the part where the building starts, is knowing what the walls are made of, what the columns are made of, and we're talking about two things. I'm not sure what it's about, but if it's about rebuilding this school, I think that's a good thing. Make the best decision so you can do the best thing so that this school gets stronger. What I understand about this school, I'm not sure how old this school is exactly, what shake tests it has passed, I think you must think about that a lot as well. It's very important to know the test results of how resistant the school is to earthquakes, from what has happened. I know my time is ending, I didn't want to stand up here without giving you a brief comment, but I congratulate you all. I congratulate you and I also think that the students that supported, they have knowledge and I know that they are the future, and today we are the example for them, and they will be the example for those kids that come in the future. So I think the best thing is, everyone has to be an example for future students.

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Ford: You congratulate us, but on the contrary, we congratulate you for participating. Thank you. Our next question?

Viviana: Yes, hello, my name is Viviana Escalante, I'm a native of Angelos, Los Angeles, and Boyle Heights. My family actually come by way of Chavez Ravine, so I've seen or heard all the horror stories about that. I don't want Boyle Heights to be run over again as it was in Chavez Ravine, and I'm also with the committee to defend Roosevelt High School, with regards to the modernization, which I think is awesome, but the modernization also does not create education, it's in the students and where they want to learn. And I think that's really important we have to understand that. And I also want to say that we really need to conserve, enhance, reclaim the R building, it can't be modernized, there's no reason why it shouldn't be modernized, and that is a part of Boyle Heights that is historical, as gentrification is taking over, we must keep that, and we must keep that in our hearts, but in our education, and all the students, as Mr. Bill Gibbs explained when he taught a class about the walkouts, he actually walked them through the R building, so they could understand exactly what it felt like. Is there anything better than walking through the actual site of history? That's very very important. Also, the outreach, I'm getting a late start on this I know people have been working on for years, and it's unfortunate that I am just learning about it, number one, number two, addressing some of the issues here, if we were actually going to have more things going on, we need multi-level parking, and that's not part of the plan. And I'd like to see the alternatives that you had, and with regards to the leaky walls or ACs for the R building, that's deferred maintenance on LAUSD, you should not have to have the students or the teachers ever suffer without air conditioning, without rat stuff, filth, that is unacceptable. And you need to take responsibility for that, so that we can give them a better platform for education. Also, there is the—I'm not sure what is going to happen with the security surveillance, and solar panels for the modernization and the restoration of the R building. Thank you.

Ford: Thank you Mrs. Escalante, thank you for partnering with us in getting your neighbors to come out to the meeting tonight. Go ahead.

Candy: I've been to so many of these meetings, I've said the same thing. Well, no I started out differently. My name's Candy Tanamache, I am a Roosevelt alumni, grew up in Boyle Heights, I graduated in '69. I am chair and president of the Roosevelt High School alumni foundation, we are a 501c3. As I've said at other meetings, I've been coming to these meetings for over two years, and I was one of the ones who initially disagreed with the R building being torn down. I also am one of the ones who walked out in 1968. I sat in the original and first meetings when the students came together, somehow things change as people's memory gets short or they weren't even there, or they're people who stood against it, the students at Roosevelt came together, and were willing to walk out of the school because we knew we weren't getting a good education. We knew that the facilities that we were studying in were falling down around us. One of our main complaints to LAUSD at the time was that Fairfax was getting imported wood for their paneling, they were getting elevators, and what was Roosevelt getting? I was in ceramics class and the ceiling fell down. That has nothing to do with getting any kind of education that you have to sit in a classroom and the water's coming through the ceiling, and tiles fall down on you. These are things that students in 1968 at Roosevelt walked out for. I know some of you think that it was about – it was about a building, to clarify that, we may have

had meetings on the back step, facing the senior quad, no one walked out of the R building at Roosevelt. They all walked out of the fenced [inaudible] that's on Mott Street. People talk as if Roosevelt started in 1968. The Conservatory talks about 1968; this school was opened in 1922. Where people are getting this gentrification, what really gets me irritated, I own property here in Boyle Heights. This has always been an immigrant community. This has always been a population made up of immigrants. What in the world makes you think it can change if it hasn't changed since Boyle Heights was created? So, I really wish that you would think about the present students and their future.

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Kenneth: My name is Kenneth Byard, and I was also here in '68, I graduated on that stage right there in that spot in January 1970. And at that time, I was the advisory chair for the whole school. I was on student council, and what I want to say about this modernization- It is a process that over the last couple of years I applaud LAUSA facilities and their folks for actually coming and involving us. I know it's their job, but LAUSD can be a little aloof, they're not always as transparent as we'd like them to be. But this particular project, when it comes to this building, this was A building, you're calling it R, but this was the A building. So, let's get our history and our facts straight in that respect. As far as the SEQUA, this is one of the most important reports because the noise, and I forget what the second thing was, the two big issues and how they're going to be able to mitigate those aspects of the modernization is really important. And I think that a lot of this needs to be around innovation, what existing building technology today, that we can incorporate into this that will take us so far into the future that we will not look back. That will train people and have a building that actually teaches them just by walking down the hall. Who needs teachers anymore? We have a whole way of actually involving students in this process and being involved in the construction. I think we should get on to innovation bandwidth and talk to the architects and with the students that actually innovate, actually project what the school can be not just today and tomorrow, but 10 years from now, 50 years from now.

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Ford: Thank you, Kenneth. Hey Kenneth, I wish my parents had given me the vitamins they gave you, so I'd be taller. Go ahead.

Gene: Hello, my name is Gene Kenotene I am a teacher here at Roosevelt. I'm the High School English Department chair, been here since 2005. In fact, this is the only school I have ever taught at. I've been in the R building since 2008. And I can say, that while I've loved the experience of teaching anyone who's a roughrider, the experience of teaching in the classroom has always left me feeling we are a neglected campus. One, because the rooms are just not big enough for the population we're dealing with, even right now, even though it's no longer a population of 5,000 students. With a group of students numbering 32, which is actually under LAUSD, which is around 40, I can't walk around my classroom without tripping on anyone. I actually have to make sure that I'm very careful. Now fortunately, the students are incredibly respectful and well-behaved so there's never any issue of I can't get to a student in need. But if there was ever an emergency, it would be chaos because of the simple fact that I would probably trip over three kids trying to get 10 feet across the classroom. Now, that being said, the technology in the R building cannot just be magically replaced if the classroom stays the same it is just too old. The people talk about the AC? They don't make our ACs anymore. People talk about the history, history is not the building, history is the curriculum teachers are teaching and I don't

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talk about the history teachers. If the teachers here, including myself, are aware of the rich history and culture of Boyle Heights, then that culture continues regardless of the building it takes place in. So, if you want to hold us accountable for that, that's where you'll see your children brought up with a culture that you want to maintain and uphold as pride. So, I ask you, even though my room is going to be a space in the air next year, please vote for the modernization project. Thank you.

Ford: And before you actually speak, I want to say, thank you so much for being so accommodating and so supportive in terms of logistics, in my mind you're superman. Thank you so much.

Francisco: Good afternoon, my name is Francisco Ceja and I'm a social studies teacher here at Roosevelt. I helped Afortunato with the audio/visual stuff, it's one of my hobbies. I was leaving but I decided to come back, I wasn't going to say anything, because everyone pretty much said all that needs to be said. But I figured I had an obligation as probably the elder statesman of the school. I'm 45 years old. I've spent more than half my life at Roosevelt. This is my 23rd year of teaching, I came to school here for three years as well. So that's 26 years of my 45 years, I've been at Roosevelt. I haven't been in the R building the whole time, but, I love this place. I love this auditorium, I kind of took it over, many years ago because it's my hobby, I wanted it to look nice, sound nice. I love this space. I do a lot of activities here. We have great concerts here. But one day I went to Garfield and I saw their auditorium. I'm like, wow, I'm working with very limited resources in this auditorium. Out there we could have a really, really good show, in this kind of modern auditorium. And I said, we need – All the teachers here, they talk about the [inaudible], they talked about the problems they see and all that, it's just an outdated building. I liked it, but our students, once they saw that virtual tour, they were so excited. And the number one thing is, why couldn't they have done that four years ago? I wish they would've had it for my graduation year. And I said, we have to start somewhere. And we're going to find ways for you as students that are not going to be a part of it, to contribute to it in some way. And it's going to be a place for your kids, or your [inaudible] that come in. And they're saying that-oh, we're interested in this, well, where were all those people, years ago? When our building was falling apart? All of a sudden everyone wants to come in and save Roosevelt. Alumni or outsiders that have never shown up or put their feet in here on this campus. I applaud the two alumni [inaudible], folks, they were here in '68, they lived through it. And they know that we need some modernization. Thank you.

Ford: Thank you so much, and that wraps up our comment period. I'd like to thank all of you for joining us this evening. As we look at the next steps that lie ahead, we will continue working, engaging you, and I need your assistance in keeping you informed and engaged, making sure that all of you sign in, all of you also have a comment sheet, if you came out here tonight please take the time to fill one out so that we have one for you on the record. And then please take into account that the comment period wraps up and adjourns on the 23rd of March, and when we go to the board of education, with the final Environmental Impact Report, we will keep you informed with the board notice, so you know when those dates are. I want to thank you for giving us such precious time of your evening, we know that you juggle other priorities to join us, we value your time and we look forward to having you back at other meetings, at the home of the might roughriders. Thank you so much. Goodnight.

D: Oral Comments

Public Meeting
Roosevelt High School Cafeteria
456 S. Mathews Street
Los Angeles, CA 90033

February 21, 2018

Response D1 Richard Alatorre

The comment includes general statements regarding the Boyle Heights community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D2 Gypsy

The comment includes general statements regarding the Boyle Heights community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D3 Luanda Diaz

The comment includes general statements regarding the Boyle Heights community.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D4 Ocho Ramirez

The comment includes general statements regarding the Boyle Heights community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D5 Miguel Guerrero

The comment includes general statements regarding the Boyle Heights community and in opposition of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D6 Maria Louise

The comment includes general statements regarding the Boyle Heights community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D7 Ariana Fernandez

The comment includes general statements regarding the Roosevelt community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D8 Exatiana

The comment includes general statements regarding the Boyle Heights community and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D9 Dr. John Fernandez

The comment includes general statements regarding the Roosevelt HS history, other local LAUSD schools and funding.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D10 Magdalena Ceja

The comment includes general statements regarding the current conditions at Roosevelt HS and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D11 Wilfredo Lopez

The comment includes general statements regarding the Roosevelt HS history.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D12 Carlos Castillo

The comment includes general statements regarding the Roosevelt HS history and current conditions and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D13 Allison Pereira

The comment includes general statements regarding the current conditions at Roosevelt HS, requesting more student interaction, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D14 Yolanda Gonzalez

The comment includes general statements regarding the current conditions at Roosevelt HS, requesting more student interaction, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D15 Marlene

The comment includes general statements regarding the current conditions at Roosevelt HS, requesting more student interaction, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D16 Jorge Lopez

The comment includes general statements regarding the current conditions at Roosevelt HS, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D17 Gavin Glosio

The comment includes general statements regarding the current conditions at Roosevelt HS, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D18 Cindy

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D19 Omar Lopez

The comment includes general statements regarding the current conditions at Roosevelt HS, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D20 Man 1

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D21 Maria Zabaleta

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D22 Joseph Cruz

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D23 Cecilia Silvia

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D24 Alvin

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D25 Joaquin Gonzalez

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D26 Enrique Rendon

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D27 Ariana Romero

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D28 Anthony

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D29 Maria

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D30 Antonio

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D31 Diana

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D32 Laura Banuelos

The comment includes general statements regarding the Roosevelt HS history and current conditions and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D33 Woman 1

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D34 Cynthia

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D35 Loyola Felix

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D36 Axel

The comment includes general statements regarding the current conditions at Roosevelt HS, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D37 Belinda Campos

The comment includes general statements regarding the current conditions at Roosevelt HS, requesting more student interaction, and Project design revisions.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D38 Veronica Gutierrez

The comment includes general statements requesting more student interaction, and Project design revisions.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D39 Woman 2

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D40 Jorge Castaneda

The comment includes general statements regarding the current conditions at Roosevelt HS, and in opposition of the proposed Project, in favor of Alternative 2.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D41 Clara Velez

The comment includes general statements in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D42 Zuma Melendez

The comment includes general statements regarding the history of Roosevelt HS, and in opposition of the proposed Project, in favor of Alternative 2.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D43 Francisca Alma

The comment includes general statements regarding the history of Roosevelt HS, and in opposition of the proposed Project, in favor of Alternative 2.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D44 Maria Leon

The comment includes general statements regarding the Roosevelt HS history and current conditions and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D45 Nicolette Morales

The comment includes general statements regarding the Roosevelt HS history and current conditions and in opposition of the proposed Project, in favor of Alternative 2.

For information regarding the 4th Street entrance and student safety the following response is provided:

It should be noted that existing school entryways/access points would remain the same under the proposed Project. The 4th street entry is intended for pedestrian use; no student drop-off/pick-up will be allowed along 4th Street, and the current signage indicating '*No Stopping Anytime*' would remain. Students would still access the campus in a manner similar to how they do now, and traffic circulation patterns are not expected to change.

Further, regarding student safety, as discussed in **Section 3.5, Pedestrian Safety** of the Draft EIR, the proposed Project includes numerous measures aimed at maintaining and improving traffic and pedestrian safety in the Project area:

Most of these measures are standard conditions of approval (SCs) that are included within the *Los Angeles Unified School District School Upgrade Program* EIR (Program EIR). Listed below are all applicable transportation features to be included in the Project.

SC-PED-1 Caltrans SRTS Program: The LAUSD is a participant in the SRTS program administered by Caltrans and local law enforcement and transportation agencies. OEHS provides pedestrian safety evaluations as a component of traffic studies conducted for new school projects. This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. The purpose of this review is to ensure that pedestrians are adequately separated from vehicular traffic.

SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and pedestrian routes to school. Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. Improvements shall include but are not limited to: (1) Clearly designate passenger loading areas with the use of signage, painted curbs, etc., (2) Install new walkway and/or sidewalk segments where none exist, (3) Any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide, and (4) Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades

SC-PED-4 School Traffic Safety Reference Guide REF – 4492.1: Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic surveys, parking restrictions, crosswalks, advance warning signs (school zone), school parking signage, traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.

SC-PED-5 School Design Guide: The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.

SC-T-3 Coordinate with the local City or County Jurisdiction and agree on the following:

- Compliance with the jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project
- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections, traffic impact thresholds
- Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events
- Loading zones will be analyzed to determine adequacy of pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Section 3.6, Traffic and Transportation in the Draft EIR is based on a traffic study performed for the proposed Project by KOA Corporation on December 19, 2017 (included as Appendix 3.6 to the Draft EIR). Traffic analysis was completed for the weekday AM and PM peak-hour traffic periods at the study intersections and included the following traffic scenarios:

- Existing Conditions (2017)
- Future No Project Conditions (2018)
- Future Conditions with Project Construction (2018)

As the proposed Project would not result in an increase in enrollment, the Project is not expected to create new vehicle trips, and there would be no Project impacts. Under the Future Conditions with Project Construction (2018), the intersection of Soto Street and 4th Street would operate at LOS E during both AM and PM peak hours. The LOS value of E represents the intersection operations approaching capacity, but would not exceed the capacity of the roadway. Based on applied significant impact standards, Project construction activities would not create significant impacts at the study intersections. Impacts would be less than significant

Culturally important elements and spaces on the Roosevelt HS campus are extensively discussed in the *Theodore Roosevelt Senior High School Cultural Analysis* prepared by PCR (now ESA) in February 2017 and included in the technical appendices of the Draft EIR. The memorandum provides background, physical descriptions, and recommendations for features such as the Lindbergh Fountain, class tiles, Japanese Garden, central quad and gazebo, benches, and murals.

With regard to the Lindbergh Fountain and the Japanese garden, these elements would be relocated, but retained as part of the proposed Project. As recommended in the report, the Fountain would be restored to its historical appearance to the extent feasible. The Japanese Garden would be relocated to an area of the campus that is easily accessible to students. Existing landscaping features, such as mature plantings, monuments, and other elements would be relocated and reused to the extent feasible. There is archival information and historical photographs housed in the Japanese American National Museum archives and an excellent publication about Japanese gardens published by the NPS Manzanar National Historic Site, which could be consulted during a redevelopment plan to gather design concepts for a new garden. Complete documentation of both features, including drawings, photographs, and other documentation would be kept as archival records and/or for display within a school building. The campus murals are powerful expressions of the Roosevelt HS student social activism, culture, and community struggles. The report discusses four exterior murals and one interior mural, including the Harvey Milk Day of Service mural, three agricultural murals, and the Avenue of the Athletes mural. In addition, the *El Plan del Pueblo – Boyle Heights*, prepared by the East LA Community Corporation, identifies the *Anahuac* mural, located along the perimeter retaining wall at Mott Street and 6th Street as one of cultural significance and the longest and largest mural in Boyle Heights.¹⁶

As part of the proposed Project, Building 1, which contains the Harvey Milk Day of Service mural and the portable buildings on which the four exterior murals are painted would all be demolished or removed. While LAUSD does not have a formal mural policy, artists are typically required to complete a license agreement which waives all rights to any mural painted on LAUSD property. In the absence of such a license agreement, the mural would be subject to the California Art Preservation Act, under which LAUSD would be obligated to contact the artist and request a waiver prior to removal. In either case, the murals would be documented and retained in archival records. As recommended by the report, the proposed Project includes areas where new murals can be painted.

¹⁶ https://issuu.com/eastlacommunitycorporation/docs/plandelpueblo_english_digitalversio

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D46 Maria Prevez

The comment includes general statements regarding the Roosevelt HS history, other local LAUSD schools and funding, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D47 Roslyn Sibarra

The comment includes general statements regarding the mission of the Los Angeles Conservancy, current conditions at Roosevelt HS, and the technical nature of the studies and graphics supporting the Draft EIR.

Refer also to Topical Response 1.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D48 Antonio Avillar

The comment includes general statements regarding the Roosevelt HS current conditions and building projects.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D49 Viviana Escalante

The comment includes general statements regarding the Roosevelt HS history and current conditions and in opposition of the proposed Project, in favor of Alternative 2.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D50 Candy Tanamache

The comment includes general statements regarding the Roosevelt HS history, innovation, and in support of the proposed Project by the chair and president of the Roosevelt HS alumni foundation.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D51 Kenneth Byard

The comment includes general statements regarding the Roosevelt HS history, technological innovation, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D52 Gene Kenotene

The comment includes general statements regarding the Roosevelt HS history, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response D53 Francisco Ceja

The comment includes general statements regarding the Roosevelt HS history, other local LAUSD schools, and in support of the proposed Project.

The comment does not raise an environmental issue within the meaning of CEQA, no further response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

11.0 CORRECTIONS AND ADDITIONS

OVERVIEW

The *California Environmental Quality Act (CEQA) Guidelines* Section 15088.5 requires:

- (a) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability ... "significant new information" requiring recirculation includes, for example, a disclosure showing that:*
 - (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies, amplifies or makes insignificant modifications in the adequate EIR.*
- (c) *If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.*
- (d) *Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.*
- (e) *A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.*

New information is "significant" if as a result of the additional information "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* 864 P.2d 502, 510 (1993) (*Laurel Heights II*). *State CEQA Guidelines* Section 15088.5(a). Recirculation is not mandated when the new information merely clarifies, amplifies, or makes and insignificant modification to an adequate Draft EIR. (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 150 P.3d 709 (2007) (quoting *Laurel Heights II*, 864 P.2d at 510); see also *Marin Mun. Water Dist. v. KG Land California Corp.*, 235 Cal.App.3d 1652, 1667 (1991) (citing *Sutter Sensible Planning v. Board of Supervisors* 122 Cal.App.3d 813 (1981)).

In addition to staff initiated text changes, clarifications to the text of the Draft EIR have been made in response to public comments received. Additional information has been identified in comments to the Draft EIR and responded to in **Section 10.0, Responses to Comments**, of this Final EIR. These changes made since publication of the Draft EIR do not substantially affect the analysis contained in the Draft EIR, do not result in a substantial increase in the severity of a significant impact identified in the Draft EIR and do not change the conclusions in any way.

All of the public comments to the Draft EIR, as well as these Corrections and Additions to the Draft EIR have been carefully reviewed to determine whether recirculation of the Draft EIR is required. All of the new information in these Corrections and Additions to the Draft EIR and in the comments and in the responses to comments merely clarify or amplify or make insignificant modifications to an adequate Draft EIR. Therefore, the Draft EIR need not be recirculated prior to certification.

CHANGES TO THE DRAFT EIR

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are in underline and deletions are shown in ~~striketrough~~ format.

Section 3.3, Hazards and Hazardous Materials

Page 3.3-37 of the DEIR is revised as follows:

No pipelines are located on the Project site. A gas transmission line owned by Sempra Energy is located adjacent to the northeast along 4th Street and diverts further north to South Fickett Street. According to information from the Sempra Energy website, this pipeline is generally equipped with a larger diameter and operates at pressures above 200 psi. This pipeline transports gas from supply points to the gas transmission system.¹ The Project site has been in use as a school since 1923, very likely well before the gas line was put in place. The renovation of the existing school site would not expose new students to an existing hazard, as there is no change in student population proposed. In addition, a Pipeline Safety Hazard Assessment (PSHA) was completed for the proposed Project in March 2018.² The results of the quantitative risk analysis in the PSHA indicate that the calculated risk for the 30-inch natural gas transmission pipeline located beneath 4th Street and South Fickett Street is 3.8×10^{-7} , which is below the LAUSD significance criterions of 1.0×10^{-6} . Therefore, the pipeline would not pose a risk to students.

¹ Converse Consultants, *Phase I Environmental Site Assessment Report, Theodore Roosevelt High School, 456 South Mathews Street, Los Angeles, California 90033, August, 30, 2016.*

² The PSHA is included as Appendix 11.0-1 to the Final EIR.

faculty, staff or visitors at the proposed Project site and no mitigation measures are required.

In addition to natural gas and hazardous liquid pipelines, the LAUSD requires that the risk of releases from high volume (>12 inches) water pipelines be evaluated. The LAUSD PSHA User Manual provides a methodology for evaluating the potential for flooding. The results of the flooding analysis in the PSHA indicate that if a rupture or leak should occur in the MWD Palos Verdes Feeder Pipeline and/or LADWP water mains within 1,500 feet of the proposed Project site, the released water would either be confined to the curbing within the streets (i.e., LADWP water mains) or would not result in water flows or depths at the school site that would pose a significant risk to students, faculty, staff or visitors (i.e., MWD Palos Verdes Feeder Pipeline product instability number of less than 4 ft²/s). ~~compliance with LAUSD guidelines for Pipeline Safety Hazard Assessments and CDE assessment procedures would ensure that measures are taken to reduce impacts associated with the existing pipeline, as detailed in Mitigation Measure MM-HAZ-1. Hazard impacts associated with hazardous substances or materials, or hazardous waste pipelines would be less than significant.~~

Mitigation Measures

~~MM-HAZ-1~~ — ~~Prior to occupancy of the new school buildings, LAUSD shall conduct a Pipeline Safety Hazard Assessments in accordance with LAUSD's User Manual: Pipeline Safety Hazard Assessment. If determined to be necessary, LAUSD shall also develop and implement emergency response procedures for the school based on the assessed risk. The plan shall include the following as appropriate:~~

- ~~————— Emergency response procedures allowing students and staff to shelter in place inside the school.~~
- ~~————— Warning systems to improve evacuation time.~~
- ~~————— Safety training for staff~~
- ~~————— Communication and coordination protocols with emergency response personnel.~~
- ~~————— Requirement that a school be notified of any third party construction near an existing pipeline.~~
- ~~————— Establish emergency telephone communication with school office.~~

Residual Impacts

~~With implementation of Mitigation Measure MM-HAZ-1, Impacts would be less than significant; no mitigation measures are required.~~

12.0 MITIGATION MONITORING AND REPORTING PROGRAM

PURPOSE

This Mitigation Monitoring and Reporting Program (MMRP) for the Roosevelt High School Comprehensive Modernization Project has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to: (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation measures; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the phasing, frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

This MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code (PRC) 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 and all other LAUSD School Upgrade Program-related projects are required to comply with design standards, conditions and sustainable building practices. Certain standards assist in reducing environmental impacts, such as CALGreen¹ and the LAUSD Standard Conditions of Approval,² as applicable by incorporating features and conditions into the project definition and design.

¹ California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

² LAUSD OEHS. "School Upgrade Program Final Environmental Impact Report." <http://achieve.lausd.net/ceqa>. Adopted by the Board of Education on November 10, 2015. (see Program EIR Table 4-1 and Appendix F).

Collaborative for High Performance Schools (CHPS).³ The Project would include CHPS criteria points under seven categories: Integration (II), Indoor Environmental Quality (EQ), Energy (EE), Water (WE), Site (SS), Materials and Waste Management (MW), and Operations and Metrics (OM). Under the current 2014 CA-CHPS criteria, the project would earn at least 250 points—110 prerequisite criteria points and 140 criteria credit points. The optional credit points would be determined during later site and architectural design phases, but all prerequisites are required.

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 in order 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.

Standard Conditions of Approval. LAUSD Standard Conditions of Approval are uniformly applied development standards that were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as from the District’s typically applied mitigation measures. The Standard Conditions were adopted by the LAUSD Board of Education in November 2015.⁴ The Standard Conditions of Approval have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations, and the Los Angeles Unified School District’s standard policies, practices, and specifications. The conditions are divided into the 19 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines). For each Standard Condition of Approval compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact.

Mitigation Measures. If after incorporation and implementation of Federal, State, and local regulations, CHPS prerequisite criteria, Project Design Features, and Standard Conditions of Approval 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:

- 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.

³ *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.*

⁴ *LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: <http://achieve.lausd.net/ceqa> (see Program EIR Table 4-1 and Appendix F).*

- 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, Project Design Features, and Standard Conditions of Approval.

This MMRP describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the Project and the methods of monitoring such actions.

This MMRP takes the form of a table that identifies the responsible entity for monitoring each mitigation measure and the timing of each measure.

**Table 12.0-1
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Action Required	Implementing Party	Responsible Party	Monitoring Responsibility	Timing	Status of Implementation
Mitigation Measures						
Impact – Cultural Resources						
MM-CUL-1: <i>Historical Resource Documentation.</i> A qualified historian or architectural historian who meets the Secretary of the Interior’s Professional Qualifications Standards shall prepare HABS-like historic documentation for the historical resources slated for demolition. The HABS-like package will document in photographs as well as descriptive and historic narrative the historical resources slated for demolition. Documentation prepared for the package will draw upon available primary- and secondary-source research as well as available studies previously prepared for the project. The HABS documentation package will incorporate available architectural drawings on file with the Los Angeles Unified School District. New measured drawings shall not be required for the project. The specifications for the HABS-like documentation package follow: <i>Photographs, Descriptive and Historic Narrative, Historic Documentation Package Submittal.</i>	This condition shall be included as a note on construction plans	LAUSD OEHS/ FSD - Asset Management	LAUSD OEHS	LAUSD OEHS	Prior to the start of construction	
MM-CUL-2: Monitoring of construction-related ground disturbance and excavation is recommended in the northern portion of the Project area. This is due to the potential for the presence of remnants of the historic Zanja Madre ditch system, which has been documented as passing through this portion of the Project area. As the depth or type of potential remains is unknown, monitoring by a qualified archaeologist is recommended during all ground disturbance and excavation in this area.	This condition shall be included as a note on construction plans	LAUSD OEHS / Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-CUL-3: To communicate stories, information, and experiences pertinent to the historic events that took place on the Roosevelt High School campus to students, faculty, alumni, and the general public, an Interpretive Plan shall be developed in collaboration with the Boyle Heights community. An interpretative program shall be developed in coordination with the community.	This condition shall be included as a note on construction plans	LAUSD OEHS/ FSD - Asset Management	LAUSD OEHS	LAUSD OEHS	Prior to the start of construction	

12.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Implementing Party	Responsible Party	Monitoring Responsibility	Timing	Status of Implementation
Impact – Noise						
MM-NOI-1: The Project shall comply with the City of Los Angeles Building regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner’s agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-2: Construction and demolition activities shall be scheduled so as to avoid, to the extent feasible, simultaneously operating several pieces of equipment that cause high noise levels.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-3: The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills and jackhammers.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-4: Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.	This condition shall be included as a note on construction plans, installation of noise barriers	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-5: Barriers such as plywood structures or flexible sound control curtains shall be erected between the proposed Project and adjacent sensitive receptors to minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 10 dB(A) and block the line-of-sight between the Project site and these adjacent land uses. This specification shall be included on all project plans.	This condition shall be included as a note on construction plans, installation of noise barriers	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	

12.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Implementing Party	Responsible Party	Monitoring Responsibility	Timing	Status of Implementation
Impact – Noise						
MM-NOI-6: The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices capable of attenuating sound by 3 dB(A) or more. This specification shall be included on all project plans.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-7: Demolition of concrete/asphalt shall not be done during school hours when children are playing in the adjacent athletic fields.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-8: The construction staging area shall be as far from sensitive receptors as possible.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-9: Two weeks prior to commencement of construction, notification shall be provided to the off-site residential, school, and church uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-10: A sonic pile driver shall be used in place of an impact pile driver to reduce noise and vibration during pile drilling/driving activities. This specification shall be included on all project plans.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
MM-NOI-11: All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. This specification shall be included on all project plans.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	

12.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Implementing Party	Responsible Party	Monitoring Responsibility	Timing	Status of Implementation
Impact – Noise						
MM-NOI-12: Any haul route for haul trucks shall avoid residential streets to the extent possible.	This condition shall be included as a note on construction plans	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	
Impact – Pedestrian Safety						
MM PED-1: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD. This requirement shall be included on all construction documents.	This requirement shall be included on all construction documents.	Construction Contractor	LAUSD PEX	LAUSD OEHS	Prior to the start of construction	