

Los Angeles Unified School District

Office of Environmental Health and Safety

MEGAN K. REILLY
Interim Superintendent of Schools

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

ADDENDUM TO THE ADOPTED MITIGATED NEGATIVE DECLARATION

RE: Lincoln High School Comprehensive Modernization – Historic Stairs and Minor Improvements

DATE: November 30, 2021

Background

On January 12, 2021, the Los Angeles Unified School District (District) Board of Education (Board) adopted the Mitigated Negative Declaration (MND) and the Mitigation Monitoring and Reporting Plan for the Lincoln High School (Lincoln HS) Comprehensive Modernization Project (Project).¹ Subsequently, the Board approved the Project as a separate action.² In further review following Project approval, the District realized that the several additional alterations were required to complete necessary upgrades associated with the Project that were identified during site reconnaissance. These improvements include:

1. Upgrades to the entrance plaza including a replacement of the existing marquee (at the corner of Lincoln Park Avenue and North Broadway);
2. Improvements to the east campus plateau (dirt patch) – install grass and irrigation;
3. Updates to the Auditorium flooring and audio/visual system;
4. Changing the switch back ramp by the east side of the Gymnasium to an elevator;
5. Adding a canopy cover between the entrances of the Performing Arts Annex and Auditorium stage doors;
6. Re-equipping the campus central plant with a new controller, pump, and associated piping;
7. Modernizing the interior plan for the kitchen area in the Home Economic Building;
8. Widening the service road for fire access at the east campus; and
9. Replacement of the historic stairs in kind.

¹ Los Angeles Unified School District. January 12, 2021. Board Report # 203-20/21.

² Los Angeles Unified School District. January 12, 2021. Board Report # 204-20/21.

While these alterations are minor improvements to existing conditions, the replacement of historic stairs required analysis to ensure that the replacement of the stairs complies with the Secretary of the Interior’s Standards (Standards). During a geotechnical assessment of the stairs, it was determined that there were underlying soil conditions and safety hazards that contributed to the severity of stair damage and adverse subgrade conditions (foundation differential settlement, erosion, voids).³ As documented in the Geotechnical Report, replacement of the stairs is required because repairing the stair would be unlikely to yield lasting results, because it would neither address underlying soil conditions nor satisfactorily resolve tripping hazards.⁴

The Standards allow replacement of a character-defining feature if it is deteriorated beyond repair if certain conditions are met. The District’s replacement stairs would be completed in-kind and under the guidance of the District’s Historic Preservation specialist.

The Office of Environmental Health and Safety (OEHS) has reviewed this change and determined that it is not considered “significant” new information that requires recirculation of the MND, per CEQA Guidelines §15088.5. The alterations to the current Project scope is not expected to result in any new significant impacts or require any new mitigation and would not result in a substantial increase in the severity of an environmental impact beyond those evaluated in the MND.

Project Overview

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

Addendum #1

The District prepared an Addendum dated May 3, 2021 to document the Project’s change to relocate Pueblo de Los Angeles Continuation HS to the vacant Jardin de Niños Early Education Center (EEC) site.

³ AECOM Technical Services, Inc. 2019. Geotechnical Report. Los Angeles, CA.

⁴ *Ibid.*

Minor Additional Project Alterations Overview

This Memo has been prepared to document additional improvements to the Project. These improvements include: upgrades to the entrance corner including a replacement of the existing marquee; improvements to the east campus plateau (dirt patch); widening the service road for fire access at the east campus; and replacement of the historic stairs. OEHS will also continue to review plans and designs as they are refined to ensure consistency with the environmental analysis contained in the MND for the Project.

CEQA Compliance

The MND was completed in compliance with the California Environmental Quality Act (CEQA, California Public Resources Code §21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, §15000 et seq.). The MND determined that the following 20 environmental impact categories were not significantly affected by the proposed Project:

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

The MND determined that a less than significant impact with mitigation incorporated on biological resources would result from the implementation of this Project. The native plant species observed on site include coast live oak (*Quercus agrifolia*), western sycamore (*Platanus racemosa*), California fan palm (*Washingtonia filifera*), California black walnut (*Juglans californica*), blue elderberry (*Sambucus nigra*), and toyon (*Heteromeles arbutifolia*). Native plant species observed consisted of isolated individuals therefore did not make up a native vegetation community. No protected trees are planned for removal as part of the Project. However, indirect effects to the critical root zone (CRZ) of these trees could occur, which may result in tree mortality, and therefore impacts to protected trees. Impacts to the CRZ of protected trees could occur due to staging or use of heavy equipment within the CRZ. The CRZ is commonly defined as a circular area around a tree trunk with a radius equivalent to one foot for each inch of diameter at breast height (DBH). Protection of the CRZ of oaks is particularly important, as compaction of soil can create anaerobic conditions that slowly suffocate mycorrhizal fungi that oak trees rely on to fixate nitrogen. With implementation of the mitigation measure of delineating the CRZ of protected trees within or near

to the area of work and requiring no work within the delineated CRZ, the Project would have a less than significant impact with mitigation incorporated to biological resources.

Minor Improvements

The minor improvements as previously described, will not cause any additional adverse change to the noted biological resources impact pursuant to Section 15064.5 nor would it add any new significant effects. These improvements will not result in an increase in the severity of an environmental impact and will replace existing facilities and be completed in-kind. The District's replacement stairs would be completed in-kind and under the guidance of the District's Historic Preservation specialist. As such, the improvements will not result in an increase in the severity of an environmental impact. The Project will have the same purpose, function, and capacity as it is currently designed.

Compliance with Section 15164 of the CEQA Guidelines

Section 15164 of the CEQA Guidelines details that the lead agency may prepare an addendum to an adopted negative declaration if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

Substantial changes are proposed in the project which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The minor improvements included in this Addendum do not constitute new or significant information that would result in an increase in the severity of the previously identified impacts. A new significant environmental impact would not result from the alterations and no new mitigation measures are required.

Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The circumstances under which the Project was undertaken have not changed since the MND was completed. No changes to the previous MND are required and no substantial increase in the severity of previously identified significant effects would result from this additional information. The minor improvements include upgrades to existing facilities and in-kind replacements that and do present a substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.

New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete.

The minor improvements do not change or provide new or significant information of substantial importance that could not have been known with the exercise of reasonable diligence at the time the previous MND was adopted. The alterations were identified as feasible necessities during design refinement and site reconnaissance.