

# Los Angeles Unified School District

## Office of Environmental Health and Safety

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### ADDENDUM TO THE ADOPTED MITIGATED NEGATIVE DECLARATION

RE: Lincoln High School Comprehensive Modernization – Pueblo de Los Angeles Continuation High School Relocation Change

DATE: May 3, 2021

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#### 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).<sup>1</sup> Subsequently, the Board approved the Project as a separate action.<sup>2</sup> In further review following Project approval, the District determined that the temporary relocation of Pueblo de Los Angeles Continuation High School (HS) to Glen Alta Elementary School (ES) during construction was no longer feasible. Instead, Pueblo de Los Angeles Continuation HS will now be permanently relocated to the vacant Jardin de Niños Early Education Center (EEC). The close proximity to the East Los Angeles Skills Center offers students at Pueblo de Los Angeles Continuation HS access to resources, trainings, and opportunities to take other classes that would not have been as readily available at Lincoln High School and Glen Alta ES.<sup>3</sup>

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 relocation of Pueblo de Los Angeles Continuation HS to Jardin de Niños EEC as a part of the Project’s 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

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

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

<sup>3</sup> Jardin de Ninos EEC was deactivated effective July 1, 2018.

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 HS was to be temporarily relocated to Glen Alta Elementary School during construction.

### **Relocation Change Overview**

This Memo has been prepared to document a change to the Project's original temporary relocation of Pueblo de Los Angeles Continuation HS to Glen Alta ES during construction. The Project will now relocate Pueblo de Los Angeles Continuation HS to the vacant Jardin de Niños EEC site. 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.

### **Relocation Change**

The relocation change 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. The change in the location of Pueblo de Los Angeles Continuation HS will not result in an increase in the severity of an environmental impact. The Jardin de Niños EEC is located approximately 1-mile from the current Pueblo de Los Angeles Continuation HS site (on the Lincoln HS campus). As with the Glen Alta ES site that was evaluated in the adopted MND, Jardin de Niños EEC is located within the immediate vicinity of Lincoln HS and has similar existing environmental conditions and capacity to accommodate Pueblo de Los Angeles Continuation HS; such that the relocation of Pueblo de Los Angeles Continuation HS would not create a new impact. The Jardin de Niños EEC site was recently vacated (in July 2018) and would require tenant improvements and Americans with Disabilities Act (ADA) related upgrades to ensure that the campus could accommodate high school students. As such, the relocation of Pueblo de Los Angeles Continuation HS to Jardin de Niños EEC 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 relocation change provided as a part of this Addendum does 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 relocation change 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 relocation change is not 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 relocation change does 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 temporary relocation of Pueblo de Los Angeles HS to Glen Alta ES was no longer feasible. The permanent relocation of Pueblo de Los Angeles HS to Jardin de Niños EEC will provide greater access to resources available at the nearby East Los Angeles Skills Center.