HAMILTON HIGH SCHOOL
Comprehensive Modernization Project

Prepared for:
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: William Meade, Environmental Planning Specialist
213.241.3432

Prepared by:
Meridian Consultants LLC
706 S. Hill Street, 11th Floor
Los Angeles, California 90014
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## APPENDICES

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1. Introduction

1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Hamilton High School (Hamilton HS), located at 2955 South Robertson Boulevard, City of Los Angeles (City), County of Los Angeles (County), California (Project site). A Negative Declaration (ND) was published for public review for 30 days, starting on October 15, 2020 and ending on November 16, 2020. This document includes a compilation of the public comments received on the ND and the responses to the comments.

A lead agency has no affirmative duty to prepare formal responses to comments on an ND under the California Environmental Quality Act (CEQA). The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the ND. In the spirit of public disclosure and engagement, LAUSD as the lead agency has responded to all written comments submitted during the 30-day public review period.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

The environmental compliance process is governed by the CEQA and the State CEQA Guidelines. Under CEQA Guidelines Section 21092.5 (b), the lead agency shall notify any public agency which comments on a ND of the public hearing or hearings if it has been scheduled. If a notice to the commenting public agency is provided in accordance with Section 21092, then the notice would satisfy the requirements for responding to comments on NDs. A Notice of Intent (NOI) was circulated to the public agencies and interested parties on October 15, 2020. A description of the NOI process for the proposed Project is included in this section under Section 1.2.1 Notice of Intent.

Although the ND process does not require the lead agency to provide formal responses to comments, as previously mentioned, in the spirit of public engagement, LAUSD has responded to all written comments submitted during the 30-day public review period as provided in this document. Under CEQA Section 15204 (b), the guidelines instruct persons and public agencies that a review of a ND should focus on the proposed finding that the project will not have a significant effect on the environment. If persons and public agencies believe that the project may have a significant effect they should:

1. Identify the specified effect,
2. Explain why they believe the effect would occur, and
3. Explain why they believe the effect would be significant.

1 California PRC, §21000 et seq (1970).
2 California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.
Per CEQA Guideline Section 15204 (c), “reviewers should explain the basis for their comments and provide data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments’ claims. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” CEQA Guideline Section 15204 (d) further stipulates each agency should only focus its comments on environmental information germane to that agency’s statutory responsibility. Lastly, CEQA Guideline Section 15204 (e) states Section 15204 in overall should not be used to restrict the ability of the reviewers to comment on the general adequacy of a document or the lead agency’s ability to reject comments not focused as recommended by this section.

As pertaining to CEQA requirements, lead agencies need only to respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

### 1.2.1 Notice of Intent and Public Outreach

Pursuant to CEQA Guideline Section 15072 and 15073, a NOI (See Appendix A and Appendix B) was circulated to the public agencies and interested parties on October 15, 2020 and posted online at the State Clearinghouse, Los Angeles County Clerk, and the lead agency website: https://achieve.lausd.net/Page/2799. The meeting notice was circulated in local newspaper outlets including the LA Daily on October 15, 2020 (See Appendix C) and La Opinion on October 15, 2020 (See Appendix D). Direct mailing to all residents within ¼ mile of the Project site was also conducted. The NOI was provided in both English and Spanish and included the following Project information:

- A brief description of the proposed Project components;
- A brief description of the Project location;
- The starting and ending dates of the review period;
- The date, time, and place of the scheduled public meeting to be held by the lead agency;
- Locations where the ND can be found for public review; and
- Information on the LAUSD Board of Education meeting.

A 30 day public commenting period started on October 15, 2020 and ended on November 16, 2020.

The NOI satisfies CEQA Guidelines Section 21092.5 (b) by notifying public agencies of the public hearing which was scheduled. The public hearing was held virtually via Zoom due to the COVID-19 pandemic outbreak on October 28, 2020 at 6:00 pm. The meeting was available to the public via online access and through telephone dial in. All agencies, organizations, and interested parties were encouraged to attend.
2. Response To Comments

This section provides all written comments received on the circulated IS/ND (see Table 1 below) and the District's response to each comment. Comments received during the virtual Public Meeting on October 28, 2020 were responded to during the meeting.

Table 1
Comment Letters Received

<table>
<thead>
<tr>
<th>Letter No.</th>
<th>Commenting Representative</th>
<th>Agency</th>
<th>Date of Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Miya Edmonson IGR/CEQA Branch Chief</td>
<td>California Department of Transportation</td>
<td>November 2, 2020</td>
</tr>
<tr>
<td>2</td>
<td>Shine Ling, AICP Manager, Transit Oriented Communities</td>
<td>Los Angeles County Metropolitan Transportation Authority</td>
<td>November 16, 2020</td>
</tr>
<tr>
<td>3</td>
<td>Lijin Sun, J.D. Program Supervisor, CEQA IGR Planning, Rule Development &amp; Area Resources</td>
<td>South Coast Air Quality Management District</td>
<td>November 10, 2020</td>
</tr>
</tbody>
</table>
November 2, 2020

Will Meade
Los Angeles Unified School District
Office of Environmental Health & Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

RE: Alexander Hamilton High School
Comprehensive Modernization Project – Negative Declaration (ND)
SCH # 2020100269
GTS # 07-LA-2020-03394
Vic. LA-10/PM: R8.016

Dear Will Meade:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced ND. The proposed Project would address the most critical physical concerns of the buildings and grounds at the campus and, through building replacement, renovation, and modernization, would provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project will include the demolition and removal of four permanent buildings/facilities and multiple portable units. Three new permanent buildings will be constructed, along with a central plant and one new lunch shelter to provide for adequate learning spaces and support areas. New athletic fields are also proposed as part of this project. Additional improvements include the modernization of two existing buildings; seismic retrofitting upgrades, access upgrades, and/or additional minor improvements to the other remaining buildings; upgrading and replacing aging utilities and infrastructure; providing new landscaping and hardscaping; and accessibility improvements consistent with the requirements of the Americans with Disabilities Act. The Los Angeles Unified School District (LAUSD) is the Lead Agency under the California Environmental Quality Act (CEQA).

The project is located near the following state facilities:

- **Interstate 10 (I-10):** approximately 500 feet from the I-10 and Robertson Blvd off-ramp.
- **Interstate 405 (I-405):** approximately 2 miles from the I-405 and I-10 interchange.
- **State Route 187 (SR-187):** approximately 4,000 feet from the SR-187 and I-10 interchange.

From reviewing the ND, Caltrans concurs with the following: “During operation, the proposed Project does not include any capacity increase and the nature of the operation would remain the same. The proposed Project would have no impact pertaining to vehicle miles travelled during operation and a less than significant impact during construction. No mitigation or further study is required.”

Therefore, the following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
enhance California’s economy and livability. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. Thus, Caltrans supports the TDM strategies this project has incorporated, such as removing pedestrian barriers and upgrading building accessibility. Additional TDM strategies that LAUSD may want to consider integrating into this project in order to further reduce VMT include:

- Ensure that project driveway placements do not directly cause issues related to line of sight of pedestrians or bicyclists.
- Verify that no more parking than required by the local permitting agency is provided.
- Provide sufficient bicycle parking for students and employees.

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans supports the following measure: “LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.” If construction traffic is expected to cause delays on any State facilities, please submit the Construction Worksite Traffic Control Plan detailing these delays for Caltrans’ review.

If you have any questions about these comments, please contact the project coordinators, Mayra Jimon and Emily Gibson, at Mayra.Jimon@dot.ca.gov and Emily.Gibson@dot.ca.gov, and refer to GTS # 07-LA-2020-03394.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse
1. Responses to Comments from Miya Edmonson, California Department of Transportation, dated November 2, 2020

1-1 The comment includes Project information statement, not an environmental topic comment.

1-2 The comment includes Project information statement, not an environmental topic comment.

1-3 The statement is acknowledged for the record. The Los Angeles Unified School District Board of Education will consider all comments prior to the finalization of this Project. The total parking spaces on the Campus are expected to be reduced as a result of the Project.

As part of the LAUSD Standard Conditions of Approval SC-PED-1, LAUSD is a participant in the SR2S program administered by Caltrans to ensure adequate separation of pedestrians from vehicular traffic from the school site. LAUSD has also developed performance guidelines per SC-PED-2, OEHS Traffic and Pedestrian Safety Program to ensure the safety of pedestrians, bikers, and vehicles around the school site. The safety of pedestrians and bikers would encourage multi-modal transportation and reduce vehicle miles traveled and Greenhouse Gas Emissions.

1.4 All required permits will be procured prior to construction commencement. A Construction Worksite Traffic Control Plan is required per LAUSD Standard Conditions of Approval prior to the commencement of construction to ensure traffic impacts to nearby roadways would be minimized to the extent feasible.
November 16, 2020

Will Meade, Environmental Planning Specialist
Los Angeles Unified School District (LAUSD)
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Sent by Email: ceqa-comments@lausd.net

RE: Hamilton HS Comp Mod – 2955 South Robertson Boulevard
Notice of Intent to Adopt a Negative Declaration (ND)

Dear Mr. Meade:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Alexander Hamilton High School Comprehensive Modernization Project (Project) located at 2955 South (S.) Robertson Boulevard (Blvd.) in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Per Metro’s area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide LAUSD, the Project Sponsor, with specific detail on the scope and content of environmental information that should be included in the Negative Declaration (ND) for the Project. In particular, this letter outlines topics regarding the Project’s potential impacts on the Metro bus facilities and services which should be analyzed in the ND, and provides recommendations for mitigation measures and project design features as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.\(^1\)

In addition to the specific comments outlined below, Metro is providing the Project Sponsor with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

Project Description

The Project includes demolition and removal of four permanent buildings/facilities and multiple portable units. Three new permanent buildings be constructed, along with a central plant and one new lunch shelter to provide for adequate learning spaces and support area. New athletic fields are also proposed as part of this project. Additional improvements include the modernization of two existing buildings; seismic retrofitting upgrades, and/or additional minor improvements to the other remaining buildings; upgrading and replacing aging utilities and infrastructure; providing new landscaping and hardscaping; and accessibility improvements consistent with the requirement of the Americans Disabilities Act (ADA).

\(^1\) See CEQA Guidelines section 15064.3(a); Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018, p. 19.
Recommendations for ND Scope and Content

Bus Service Adjacency

1. **Service:** Metro Bus Line 17 operates on Robertson Blvd. adjacent to the Project. There are a total of two Metro Bus stops directly adjacent to the Project. One is located at the northeast corner of Cattaraugus Avenue (Ave.) and Robertson Blvd. and the second is located at the southeast corner of Robertson Blvd. and Kincardine Ave. Both bus stops service Metro Bus Line 17 that heads southbound.

2. **Impact Analysis:** The ND should analyze potential effects on Metro Bus service and identify mitigation measures as appropriate. Potential impacts may include impacts to transportation services, stops, and temporary or permanent bus service rerouting. Specific types of impacts and recommended mitigation measures to address them include, without limitation, the following:
   a. **Bus Operations Coordination:** The Project Sponsor shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction.
   b. **Bus Stop Condition:** The ND should identify all bus stops on all streets adjacent to the Project site. During construction, the Project Sponsor may either maintain the stop in its current condition and location, or temporarily relocate the stop consistent with the needs of Metro Bus operations. Temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be ADA-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Once the Project is completed, the Project Sponsor must ensure any existing Metro bus stop affected by the Project is returned to its pre-Project location and condition, unless otherwise directed by Metro.
   c. **Driveways:** Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
   d. **Bus Stop Enhancements:** Metro encourages the installation of enhancements and other amenities that improve safety and comfort for transit riders. These include benches, bus shelters, wayfinding signage, enhanced crosswalks and ADA-compliant ramps, pedestrian lighting, and shade trees in paths of travel to bus stops. The Project Sponsor should consider coordinating with the City for the installation of such amenities as part of the Project.

If you have any questions regarding this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address: Metro Development Review, One Gateway Plaza, MS 99-22-1, Los Angeles, CA 90012-2952.

Sincerely,

Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:
- Adjacent Development Handbook: [https://www.metro.net/projects/devreview/](https://www.metro.net/projects/devreview/)
2. Responses to Comments from Shine Ling, AICP, Los Angeles County Metropolitan Transportation Authority, dated November 16, 2020

2-1 The comment includes Project information statement, not an environmental topic comment.

2-2 The comment includes an information statement, not an environmental topic comment.

2-3 The statement is acknowledged for the record. The Los Angeles Unified School District Board of Education will consider all comments prior to the finalization of this Project. Potential impacts to adjacent bus operation are minimized by LAUSD Standard Conditions of Approval SC-T-4, requiring the submission of a Construction Worksite Traffic Control Plan prior to the commencement of construction to ensure traffic impacts to nearby roadways would be minimized to the extent feasible. Construction of the Project will not impact bus stops and bus stops will be maintained in their current condition. The proposed Project will not add any driveways near bus stops and will be utilizing the existing driveways on Robertson Boulevard, where the Metro bus stops adjacent to the school are located. The Project would have no impacts to bus operations during construction or operation outside of construction traffic as the Project would have no increase in student capacity and all construction activities would take place within the existing school grounds. The Project footprint does not include areas outside of the existing Hamilton HS campus where the Metro Buses operate.
Negative Declaration (ND) for the Proposed
Alexander Hamilton High School Comprehensive Modernization Project
(Proposed Project) (SCH No.: 2020100269)

South Coast Air Quality Management District (South Coast AQMD) 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 ND.

South Coast AQMD Staff’s Summary of Project Description in the ND
The Lead Agency proposes to demolish 126,878 square feet of existing structures, modernize two buildings totaling 84,745 square feet, and build five new school facilities totaling 149,173 square feet on 27.7 acres. (Proposed Project). The Proposed Project is located on the southwest corner of South Robertson Boulevard and Cattaraugus Avenue in the City of Los Angeles (City). Based on a review of Figure 1, Regional Location Map, and Figure 5, Proposed Project Site Plan, in the ND, South Coast AQMD staff found that one of the new school facilities will be located within 500 feet of Interstate 10 (I-10). Construction of the Proposed Project is expected to take six years and three months⁴. According to the ND, the Proposed Project contains soil contaminated with lead and arsenic that will need to be removed in accordance with the Removal Action Workplan that will be prepared for the Proposed Project².

South Coast AQMD Staff’s Summary of the Air Quality Analysis in the ND
According to the ND, the Lead Agency includes five air quality standard conditions for the Proposed Project. One of the standard conditions is to require construction equipment as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower⁵. In the CalEEMod Air Quality Emission Output Files, the Lead Agency assumed the use of Tier 4 Final construction equipment to calculate the Proposed Project’s regional construction emissions⁴. The Proposed Project’s daily maximum regional construction NOx emissions would be 89 pounds per day (lbs/day)⁵.

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¹ ND. Page 27.
² Ibid. Page 73.
³ Ibid. Page 40.
⁴ Ibid. Appendices. PDF pages 66 and 67.
⁵ Ibid. Page 43.
South Coast AQMD Staff’s Comments

**CEQA Air Quality Impact Analysis for Regional Construction Impacts**

The Lead Agency used a default one-way truck trip length of 20 miles to quantify the Proposed Project’s construction emissions from hauling construction materials and importing or exporting soil. In the Utilities and Service System Section of the ND, the Lead Agency stated that nonhazardous solid waste will be disposed of within three of the landfills within the City. Since the Proposed Project contains soil contaminated with lead and arsenic that will need to be removed, and depending on the type of contamination, contaminated soil may not be accepted at any of the landfills within the City and may need to be disposed at a permitted hazardous disposal facility outside the City or the Los Angeles County with a one-way trip length that is likely longer than 20 miles. Using a one-way truck trip length of 20 miles likely underestimated the Proposed Project’s construction emissions, particularly from NOx. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project will use to dispose contaminated soil, disclose it in the Final ND, and re-calculate the Proposed Project’s construction emissions from haul truck trips based on the appropriate one-way trip length.

**Air Quality Standard Condition for Construction Equipment**

In the ND, the Lead Agency is committed to using construction equipment as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. This means that some construction equipment at the Proposed Project is Tier 3 and some is Tier 4. However, based on a review of the CalEEMod Air Quality Emission Output Files for the Proposed Project, South Coast AQMD staff found that the Lead Agency calculated the Proposed Project’s construction emissions based on an assumption that all construction equipment at the Proposed Project is Tier 4 Final. It is not appropriate to rely on emissions reductions from Tier 4 Final construction equipment to calculate the Proposed Project’s construction emissions when the Proposed Project can use either Tier 3 or Tier 4 construction equipment. Therefore, South Coast AQMD staff recommends that the Lead Agency revise and strengthen the air quality standard condition for construction equipment in the Final ND to require the use of Tier 4 Final construction equipment. Alternatively, if the Lead Agency does not revise the air quality standard condition for construction equipment in the Final ND, the Lead Agency should re-calculate the Proposed Project’s construction emissions based on the use of Tier 3 construction equipment to determine the level of significance for the Proposed Project’s construction air quality impacts.

**Health Risk Reduction Strategies**

The Proposed Project is located within 500 feet of I-10. Sensitive receptors at the Proposed Project will be exposed to diesel particulate matter emissions from mobile sources traveling on I-10 (e.g., diesel fueled, heavy-duty trucks). Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15.

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or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters\(^9\), a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumptions that the Lead Agency should evaluate in the Final ND. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Final ND. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

Conclusion
Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. If you have any questions or wish to discuss the comments, please contact me at lsun@aqmd.gov.

Sincerely,

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

LS
LAC201020-02
Control Number

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3. Response to Comments from Lijin Sun, J.D., South Coast Air Quality Management District, dated November 10, 2020

3-1 Project information statement, not an environmental topic comment.

3-2 To clarify, the Lead Agency used non-tiered construction equipment to calculate Table 4: Unmitigated Maximum Regional Construction Emissions on page 43 of the ND. As shown by the calculations, NOx emissions would be 89 pounds per day under the unmitigated circumstances and below the SCAQMD Mass Daily Threshold of 100 pounds per day. Therefore, no restriction in terms of construction equipment would be required for the proposed Project. However, per LAUSD Standard Conditions SC-AQ-4, construction personnel would still be required to use Tier 3 or Tier 4 construction equipment to minimize construction emissions.

3-3 The nearest licensed contaminated soil disposal facility is located at 12328 Hibiscus Road in the City of Adelanto, California, approximately 70 miles (one-way) from the Project site. Although the total number of truck trips that would result from soil contaminated with lead and arsenic is unknown (as it would be based on total volume of soil to be exported), for purposes of this response it was assumed that all of the contaminated soil (approximately 181 cubic yards) would be exported and hauled to this facility. This scenario (considered worst case) would result in approximately 26 total trips. Assuming each truck would travel 140 miles per roundtrip, there would be a total of 3,640 miles traveled for contaminated soil hauling.

In adherence to LAUSD Standard Conditions of Approval SC-AQ-4, construction activities would use equipment rated by the USEPA as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. Table 2: Updated Unmitigated Maximum Regional Construction Emissions below, includes the total estimated truck trips noted above for the removal of contaminated soil.

### Table 2

**Updated Unmitigated Maximum Regional Construction Emissions**

<table>
<thead>
<tr>
<th>Source</th>
<th>VOC</th>
<th>NOx</th>
<th>CO</th>
<th>SOx</th>
<th>PM10</th>
<th>PM2.5</th>
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<tbody>
<tr>
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<td>47</td>
<td>121</td>
<td>&lt;1</td>
<td>9</td>
<td>3</td>
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<tr>
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<td>550</td>
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<td>55</td>
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<table>
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<tr>
<th>Threshold exceeded?</th>
<th>No</th>
<th>No</th>
<th>No</th>
<th>No</th>
<th>No</th>
<th>No</th>
</tr>
</thead>
</table>

Source: CalEEMod.

Notes:

- CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
As shown in Table 2, with adherence to SC-AQ-4, impacts related to construction emissions would remain less than significant. As such, the significance level determination noted in the ND would not change with the inclusion of truck haul trips for the disposal of contaminated soils during construction.

3-4 To clarify, the Lead Agency used non-tiered construction equipment to calculate Table 4: Unmitigated Maximum Regional Construction Emissions on page 43 of the ND. As shown by the calculations, NOx emissions would be 89 pounds per day under the unmitigated circumstances and below the SCAQMD Mass Daily Threshold of 100 pounds per day. Therefore, no restriction in terms of construction equipment would be required for the proposed Project. However, per LAUSD Standard Conditions SC-AQ-4, construction personnel would still be required to use Tier 3 or Tier 4 construction equipment to minimize construction emissions.

3-5 A health risk assessment (HRA) would typically be conducted for new school projects within 500 feet of a freeway. However, a HRA is not required for the proposed Project which involves reconstruction, upgrade, and maintenance of an existing school site. The new buildings that will be constructed as part of the proposed Project, along with the existing buildings receiving HVAC upgrades, will be designed with filtration systems with Minimum Efficiency Reporting Value 13 (MERV 13) to reduce emissions from the I-10 freeway.

3-6 The District will provide the above written responses to comments 3-1 to 3-5 raised by SCAQMD prior to adoption of the Final ND.
NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION AND
NOTICE OF PUBLIC COMMENT PERIOD FOR A
PRELIMINARY ENVIRONMENTAL ASSESSMENT – EQUIVALENT

TO: Agencies, Organizations, and Interested Parties

PROJECT TITLE: Alexander Hamilton High School Comprehensive Modernization Project

SUBJECT: Notice of Intent to Adopt a Negative Declaration and Notice of Public Comment Period for a Preliminary Environmental Assessment- Equivalent for the Comprehensive Modernization of Alexander Hamilton High School

Notice is hereby given that the Los Angeles Unified School District (LAUSD or District), as Lead Agency under the California Environmental Quality Act (CEQA) has prepared an Initial Study (IS) for the Alexander Hamilton High School Comprehensive Modernization Project (proposed Project), pursuant to the CEQA (Public Resources Code [PRC], Division 13, Section 21000 et seq. [CEQA Statutes] and the California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Section 15000 et seq. [CEQA Guidelines]). Based on the conclusions of the IS, LAUSD determined that the proposed Project would have no significant adverse impacts on the environment and a Negative Declaration (ND) is appropriate. The District is providing public notice in compliance with CCR Title 14, Chapter 3, Sections 15072 and 15073, as amended. Notice is further given that a Preliminary Environmental Assessment – Equivalent (PEA-E) has been prepared for the proposed Project and is available for review.

PROJECT LOCATION: The 20.7-acre Alexander Hamilton High School campus is located at 2955 S Robertson Boulevard, City of Los Angeles.

PROJECT DESCRIPTION: The proposed Project would address the most critical physical concerns of the buildings and grounds at the campus and, through building replacement, renovation, and modernization, would provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project will include the demolition and removal of four permanent buildings/facilities and multiple portable units. Three new permanent buildings will be constructed, along with a central plant and one new lunch shelter to provide for adequate learning spaces and support areas. New athletic fields are also proposed as part of this project. Additional improvements include the modernization of two existing buildings; seismic retrofitting upgrades, access upgrades, and/or additional minor improvements to the other remaining buildings; upgrading and replacing aging utilities and infrastructure; providing new landscaping and hardscaping; and accessibility improvements consistent with the requirements of the Americans with Disabilities Act. The PEA-E presents the findings of the site assessment investigations performed for this proposed Project. The campus is not on any of the lists compiled under Government Code Section 65926.5.

DOCUMENT AVAILABILITY: The IS-ND and PEA-E are available electronically for public review at the locations listed below.

- Alexander Hamilton High School website (https://hamiltonhs-lausd-ca.schoolloop.com/)
- LAUSD Office of Environmental Health and Safety website:
  - CEQA IS-ND (http://achieve.lausd.net/ceqa)
  - PEA-E (http://achieve.lausd.net/siteassessment)
- California State Clearinghouse (https://ceqanet.opr.ca.gov/)

PUBLIC REVIEW PERIOD: The IS-ND (pursuant to CCR, Title 14, Section 15073[a]) and PEA-E are available for public review and comment from October 15, 2020 to November 16, 2020.

RESPONSES AND COMMENTS: Please indicate a contact person for your agency or organization and send your comments to:

**CEQA and PEA-E Questions and Comments**
Los Angeles Unified School District
Office of Environmental Health and Safety
Attention: Will Meade, Environmental Planning Specialist
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net
Please include “Hamilton HS Comp Mod” in the subject line.

COMMENT MEETING: LAUSD will hold a virtual public meeting on **October 28, 2020 at 6:00pm. Please connect via Zoom or by phone:**

- Zoom Online Meeting Link: https://lausd.zoom.us/j/85821918112; Zoom Online Webinar Meeting ID #: 858 2191 8112; Phone # Dial In: +1-213-338-8477 ID # 858 2191 8112

All agencies, organizations, and interested parties are encouraged to attend.

**LAUSD BOARD HEARING:** Additional information concerning the proposed Project will be posted on the District’s OEHS website: http://achieve.lausd.net/ceqa. The LAUSD Board of Education (Board) will consider this item during a scheduled meeting. Check the LAUSD Board website to find the meeting date and time at http://laschoolboard.org.
ASUNTO: Aviso de intención de adoptar una declaración negativa y aviso de periodo de comentarios públicos para una evaluación ambiental preliminar-equivalente para la modernización integral de la Escuela Secundaria Alexander Hamilton.

PARA: Organismos, organizaciones y partes interesadas

TÍTULO DEL PROYECTO: Proyecto de Modernización Integral de la Escuela Secundaria Alexander Hamilton

RESPUESTAS Y COMENTARIOS: Por favor, indique una persona de contacto de su organismo u organización y envíe sus comentarios a:

CEQA and PEA-E Questions and Comments
Los Angeles Unified School District
Office of Environmental Health and Safety
Con atención a: Will Meade, Environmental Planning Specialist
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net
Por favor, incluya “Hamilton HS Comp Mod” en el asunto.

REUNIÓN PARA PRESENTAR COMENTARIOS: El LAUSD llevará a cabo una reunión virtual pública el día 28 de octubre de 2020 a las 6:00pm. Por favor, conéctese por medio de Zoom o por teléfono:

- Enlace a la reunión en línea por medio de Zoom: https://lausd.zoom.us/j/85821918112; ID de Reunión en Línea de Zoom No. 858 2191 8112; No. de teléfono de conexión: +1-213-338-8477 ID No. 858 2191 8112.

Se invita a asistir a todos los organismos, organizaciones y partes interesadas.

CONSTRUCTION CONTRACTING OPPORTUNITY

CNS-3406383

Los Angeles County Sanitation Districts invite Bids for the Construction of
LONG BEACH WATER RECLAMATION PLANT
POWER DISTRIBUTION SYSTEM MODIFICATIONS
(Bid Opening December 3, 2020 - Estimate $13,000,000 - 16,000,000)
Contracting And Supply Opportunities Include:
Asphalt; Concrete; Electrical Equipment

Los Angeles County Sanitation Districts encourage participation of minority, women, disadvantaged, disabled veterans, and small business enterprises.

Plans and Specifications may be obtained through Quest Construction Data Network (QuestCDN) for a nonrefundable fee of $50.00. This can be done via a link on the District’s website or by completing a Request for (RFQ) at the following ARQ number: 7337942 through the QuestCDN website (www.questcdn.com). Visit the site at www.lascd.org or call 562-412-5307 for “Opportunities, Construction Bids”

MORLIN ASSET MANAGEMENT, LP, as Delaware Limited Partnership as Agent for the JOINT MANAGEMENT COUNCIL, an unincorporated association, will receive qualifications packages from consultants wishing to become pre-qualified for an available bidding opportunity at Los Angeles Unión Station. It is the intent of this Joint Management Council to select a firm that will provide consulting services at Los Angeles Unión Station at the best possible value.

Con la finalidad de que los principales servicios públicos y de los edificios de la estación sean consistentes con los requisitos de la Ley para Estadounidenses con Discapacidades, el IS-MND y la PEA-E están disponibles para su revisión y comentarios públicos desde el 15 de octubre de 2020 hasta el 16 de noviembre de 2020.

Por este medio se avisa que el Distrito Escolar Unificado de Los Ángeles (LAUSD o el Distrito), como Agencia Principal en virtud de la Ley de Calidad Ambiental de California (CEQA) ha preparado un Estudio Inicial para el Proyecto de Modernización Integral de la escuela preparatoria Abraham Lincoln (el Proyecto propuesto). Por lo tanto, ha sido abierto un periodo de revisión para el Proyecto de Modernización Integral de la escuela preparatoria Abraham Hamilton (el Proyecto propuesto), de conformidad con la CEQA (Código de Recursos Públicos [PRC], Título 13, Sección 21100 y siguientes [Estatutos de la CEQA] y el Código de Regulaciones de California [CCR], Título 14, División 15, Capítulo 3, Sección 15000 y siguientes [Directrices CEQA]). Con base en las conclusiones del Estudio Inicial el LAUSD determinó que el proyecto propuesto no tendría un impacto adverso considerable sobre el ambiente y corresponde a una Declaración Negativa (ND). El Distrito brindará aviso público en cumplimiento de SECR 21105.05, Capítulo 3, Secciones 15072 y 15073, emendado. Además, se avisa que una Evaluación Ambiental Preliminar – Equivalente (PEA-E) ya está disponible para su revisión.

La PEA-E presenta los hallazgos de las investigaciones de evaluación del sitio realizadas para este Proyecto propuesto y está disponible para su examen.

DISPONIBILIDAD DE DOCUMENTOS: El IS-ND y la PEA-E están disponibles electrónicamente para su revisión pública en las ubicaciones siguientes.

• Sitio web de la Escuela Secundaria Alexander Hamilton (https://hamiltonhs-lausd-ca.schoolloop.com/)
• Sitio web de la Oficina de Salud y Seguridad Ambiental del LAUSD: (http://achieve.lausd.net/ceqa)
• PEA-E (http://achieve.lausd.net/siteassessment)
• Centro de intercambio de información del estado de California (https://ceqeanet.opr.ca.gov/)

PERIODO DE REVISIÓN PÚBLICA: El IS-ND (de acuerdo con el CCR, Título 14, Sección 15073[a]) y la PEA-E estarán disponibles para su revisión y comentarios públicos desde el 15 de octubre de 2020 hasta el 16 de noviembre de 2020.

RESPUESTAS Y COMENTARIOS: Por favor, indique una persona de contacto de su organismo y envíe sus comentarios a:

Email: CEQA-comments@lausd.net
Por favor, incluya “Hamilton HS Comp Mod” en el asunto.

REUNIÓN PARA PRESENTAR COMENTARIOS: El LAUSD llevará a cabo una reunión virtual pública el día 28 de octubre de 2020 a las 6:00pm. Por favor, conéctese por medio de Zoom o por teléfono:

• Enlace a la reunión en línea por medio de Zoom: https://lausd.zoom.us/j/85821911822 ID de reunión: 858 2191 8122

Se invita a asistir a todos los organismos, organizaciones y partes interesadas.