

Soil Removal Plan

James A. Garfield High School
5101 East 6th Street, East Los Angeles, California 90022

Prepared for

Drew Williams, PG
Site Assessment Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue
Los Angeles, California 90017

Prepared by

Terraphase Engineering Inc.
18401 Von Karman Avenue, Suite 410
Irvine, California 92612

September 30, 2024

Project Number S030.064.001

Final

File: rpt-Garfield HS SRP-S030-064-001-DTE



Contents

- Acronyms and Abbreviations iv
- Signatures v
- 1 Introduction..... 1
- 2 Summary of PEA-E Investigation 2
 - 2.1 Site Summary 2
 - 2.2 PEA-E Work Plan 3
 - 2.3 PEA-E Investigation..... 3
 - 2.4 Chemicals of Concern 3
- 3 Screening Criteria 4
 - 3.1 Arsenic 4
 - 3.2 Lead 4
- 4 Proposed Excavation Areas 4
- 5 Removal Action Implementation 5
 - 5.1 Site Preparation 6
 - 5.1.1 Public Participation..... 6
 - 5.1.2 Health and Safety Plan..... 6
 - 5.1.3 Permits and Plans 6
 - 5.1.4 Delineation of Excavation Areas..... 6
 - 5.1.5 Utility Clearance 7
 - 5.1.6 Site Security 7
 - 5.1.7 Dust Control..... 7
 - 5.2 Excavation Plan..... 8
 - 5.2.1 Excavation Procedures 8
 - 5.2.2 Decontamination Procedures..... 8
 - 5.3 Soil Management..... 9
 - 5.4 Confirmation Soil Sampling 9
 - 5.5 Quality Assurance/Quality Control..... 10
 - 5.5.1 Field Duplicates..... 10
 - 5.5.2 Temperature Blanks 10
 - 5.5.3 Laboratory QC Samples and Criteria 10
 - 5.5.4 Updated Profile Sampling..... 11
 - 5.6 Transportation Plan for Off-Site Disposal..... 11
 - 5.7 Backfill and Site Restoration 11
 - 5.8 Variances 11



6 Reporting..... 11

7 Public Participation..... 12

8 References..... 12

Table

- 1 Proposed Soil Excavation Volume Estimations

Figures

- 1 Site Location
- 2 Site Layout
- 3 Arsenic and Lead Concentrations Exceeding Screening Criteria
- 4 Proposed Excavations



Acronyms and Abbreviations

bgs	below ground surface
CEQA	California Environmental Quality Act
COC	chain of custody
cy	cubic yards
DTSC	Department of Toxic Substances Control
ft ²	square feet
Garfield HS	James A. Garfield High School
HASP	health and safety plan
IS/MND	Initial Study/Mitigated Negative Declaration
LAUSD	Los Angeles Unified School District
mg/kg	milligrams per kilogram
Millennium	Millennium Consulting Associates
NOI	Notice of Intent
OEHS	Office of Environmental Health & Safety
PEA-E	preliminary environmental assessment-equivalent
PEA-E Work Plan	<i>Preliminary Environmental Assessment-Equivalent Work Plan</i>
Phase I ESA	<i>Phase I Environmental Site Assessment Report</i>
QC	quality control
RACR	removal action completion report
Site	5101 East 6th Street in East Los Angeles, California
SCAQMD	South Coast Air Quality Management District
SRP	<i>Soil Removal Plan</i>
Terraphase	Terraphase Engineering Inc.
USA	Underground Service Alert



Signatures



Jonathan Marshak, PG, Senior Project Geologist

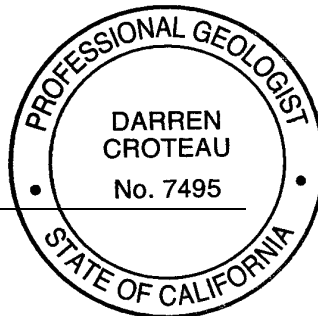
9/30/2024

Date

All geologic information, conclusions, and recommendations in this document have been prepared under the responsible charge of a California-licensed Professional Geologist.



Darren Croteau, PG, Principal Geologist



9/30/2024

Date

1 Introduction

At the request of the Los Angeles Unified School District (LAUSD), Terraphase Engineering Inc. (Terraphase) has prepared this *Soil Removal Plan* (SRP) for the James A. Garfield High School (Garfield HS) at 5101 East 6th Street in East Los Angeles, California (Site; Figure 1)

LAUSD is undertaking a major modernization project at the Site to build a new four-story building and library. The development will involve demolishing two portable classrooms (AA-336 and AA-2554) and Buildings 100 and 200, shown on Figure 2. The *Phase I Environmental Assessment Report* (Phase I ESA) prepared for the Site (Millennium Consulting Associates [Millennium] 2022) and additional Site reconnaissance by Terraphase identified recognized environmental conditions within the development zone. Based on the recommendations from the Phase I ESA, a *Preliminary Environmental Assessment-Equivalent Work Plan* (PEA-E Work Plan) was prepared (Terraphase 2023a) to characterize potential environmental impacts in Site soil in the development zone.

The *Preliminary Environmental Assessment-Equivalent Report* (Terraphase 2023b) identified lead and arsenic impacts in several samples which exceeded the Site screening criteria. The calculated 95 percent upper confidence limit concentrations for arsenic and lead for the Site soil were below their respective screening criteria, and Terraphase determined that the South Coast Air Quality Management District (SCAQMD) Rule 1466 regulations were not applicable for the proposed redevelopment activities.¹ In consultation with LAUSD Office of Environmental Health & Safety (OEHS), Terraphase recommended excavation and removal of shallow soil impacted with arsenic and lead from areas which exceeded the screening criteria.

This SRP was prepared to describe excavation, segregation, and proper handling of soil with arsenic and lead exceedances identified in the *Preliminary Environmental Assessment-Equivalent Report Report* (Terraphase 2023b). The SRP includes the following elements:

- A summary of the preliminary environmental assessment-equivalent (PEA-E) investigation;
- A description of the proposed screening levels;
- Requirements for public participations;
- Excavation activities;
- Waste handling and storage;
- Confirmation soil sampling; and
- Reporting.

¹ <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>



2 Summary of PEA-E Investigation

A description of the Site and results of the PEA-E investigation are presented below.

2.1 Site Summary

The approximately 20-acre Site is an active high school comprised of various buildings, recreational fields, and parking lots. The Site is surrounded by residential properties with commercial businesses on its east side. The development zone, which was the focus of the PEA-E investigation, comprises approximately 1.8 acres and is in the southwest corner of the Site bounded by Fraser Avenue to the west and East 6th Street to the south. The development zone consists of a parking lot, two portable classrooms (AA-336 and AA-2554), and two buildings (Building 100, consisting of a parking garage and classrooms constructed circa 1963, and Building 200, consisting of a library and classrooms constructed circa 1975) planned for demolition. This area will be redeveloped with a four-story building and a new library. The development zone is shown on Figure 2.

Based on review of the Phase I ESA (Millennium 2022), the Site has been occupied by Garfield HS since approximately 1928. Aerial photographs show that the Site was undeveloped from as early as 1923. In 1928, the Site was developed with several buildings and recreational fields on the north side. The Site was further developed with buildings added on the southwestern corner between 1928 and 1938, and several residential buildings added on the north portion of the Site by 1948. Between 1972 and 1994, the majority of the Site remained unchanged except for several cycles of residential development and grading on the northwest portion of the Site. In 2012, a baseball field was added to the northwest corner of the Site. The Phase I ESA cited historical plans provided by LAUSD OEHS, which indicated that autobody, wood working, print, heavy metal shops, and a gun range formerly operated at the Site (Millennium 2022).

The Site is within the Los Angeles Basin in a low-lying area filled with unconsolidated alluvial deposits from the early Holocene and late Pleistocene period consisting of moderately drained silty clay (Millennium 2022). The Site is not located within an earthquake fault zone and the closest active fault is the East Montebello Fault 3.5 miles east of the Site (Millennium 2022).

The Site is within the California Coastal Basin Aquifer. Site soils are expected to have moderate infiltration rates, with expected groundwater flow towards the south along the general topographic gradient (Millennium 2022). Depth to groundwater was measured at 212 feet below ground surface (bgs) in state well 2847B, located adjacent to the east side of the Site, on December 31, 2021.²

² <https://dpw.lacounty.gov/general/wells/#>



2.2 PEA-E Work Plan

The PEA-E Work Plan proposed strategies (Terraphase 2023a) to characterize impacts to shallow soil at the Site from the recognized environmental conditions identified in the Phase I ESA. The following contaminants of potential concern were identified in shallow soil:

- Arsenic and organochloride pesticides from pesticide use;
- Asbestos and lead along building driplines due lead-based paint and building materials;
- Volatile organic compounds from a photograph development laboratory and former printing shop;
- Total petroleum hydrocarbons from a three-stage clarifier;
- Polychlorinated biphenyls from electrical transformers;
- SCAQMD toxic air contaminants including asbestos, cadmium, lead, mercury, nickel, organochloride pesticides, polycyclic aromatic hydrocarbons, and polychlorinated biphenyls.

2.3 PEA-E Investigation

The PEA-E investigation was conducted in general accordance with the PEA-E Work Plan and with the California Environmental Protection Agency, Department of Toxic Substances Control's (DTSC) guidance for school sites (2006) and the *Preliminary Endangerment Assessment Guidance Manual* (2015). The work was conducted at the Site April 4–5, 2023.

A total of 118 soil samples were collected from 40 soil borings during the investigation. Most of the soil borings were advanced to 5 feet bgs with a hand auger and samples were collected at depths of 1, 3, and 5 feet bgs. Two borings in the vicinity of the three-stage clarifier were advanced to 15 feet bgs using a direct-push drilling rig, and samples were collected at depths of 1, 5, 10, and 15 feet bgs.

2.4 Chemicals of Concern

All contaminants of potential concern identified during the PEA-E investigation, except for arsenic and lead, were either not detected or were detected at concentrations that were below the Site screening criteria. Concentrations of arsenic and lead which exceeded the Site screening criteria in several samples are shown on Figure 3. Three samples (SB-13-1.0, SB-25-1.0, and SB-36-1.0) exceeded the Southern California background arsenic concentration of 12 milligrams per kilogram (mg/kg [Chernoff, Bosan, and Oudiz 2008]) at concentrations ranging from 13 (SB-25-1.0 and SB-36-1.0) to 79 mg/kg (SB-13-1.0). Five samples (DUP-04, SB-22-1.0, SB-34-3.0 and its duplicate sample DUP-08, and SB-36-1.0) exceeded the DTSC-modified screening level of 80 mg/kg (DTSC Human and Ecological Risk Office 2022) at concentrations ranging from 92 to 200 mg/kg (SB-36-1.0 and DUP-04, respectively). Therefore, arsenic and lead are the chemicals of concern for this SRP.



3 Screening Criteria

The following screening levels for arsenic and lead were established during the PEA-E investigation.

3.1 Arsenic

The screening level for arsenic is 12 mg/kg, consistent with the Southern California background arsenic concentration (Chernoff, Bosan, and Oudiz 2008).

3.2 Lead

The screening level for lead is 80 mg/kg, consistent with the DTSC-modified screening level for lead (DTSC Human and Ecological Risk Office 2022).

4 Proposed Excavation Areas

Soil excavation and removal was selected as the most appropriate removal action alternative for soil impacted with arsenic and/or lead. The proposed excavation areas are shown on Figure 4. The estimated excavation volumes are presented in Table 1.

There are six proposed excavation areas identified within the development zone that have soil containing lead and/or arsenic which exceed the screening criteria. The excavation areas are estimated around soil samples which exceeded the screening criteria in a given boring advanced during the PEA-E investigation. Since no additional soil characterization work has been performed around these borings where arsenic and lead exceeded the Site screening criteria, the extent of arsenic- and lead-impacted soil has not been defined. This SRP proposes a square excavation surrounding each of the borings, which extends 3 feet laterally in each cardinal direction for excavation areas of approximately 36 square feet (ft²). If the edge of a building or another obstruction is encountered within the 3-foot extension, the excavation will terminate a safe distance from the edge of the building. The excavations are proposed to extend vertically approximately 6 inches beyond the impacted soil in each excavation area. The final depth of the excavations will depend on field measurements and confirmation soil sampling results. Each approximately 36 ft² (6 by 6 feet) excavation area is shown on Figure 4 and described below.

- **Excavation SB-13:** This excavation area is located around boring SB-13 at the south edge of Building 100. Sample SB-13-1.0 had an arsenic concentration of 79 mg/kg, and the deeper sample in boring SB-13-3.0 had a concentration of 5.7 mg/kg. The proposed excavation area of approximately 36 ft² to a depth of 1.5 feet bgs encompasses approximately 2 cubic yards (cy) of arsenic-impacted soil.
- **Excavation SB-14:** This excavation area is located around boring SB-14 at the north edge of Building 200. The duplicate sample (DUP-04) of SB-14-3.0 had a lead concentration of 200 mg/kg, and the deeper sample in boring SB-14-5.0 had a concentration of 53 mg/kg. The proposed excavation area of approximately 36 ft² to a depth of 3.5 feet bgs encompasses approximately 4.67 cy of lead-impacted soil.



- **Excavation SB-22:** This excavation area is located around boring SB-22 at the southeast corner of Building 200. Sample SB-22-1.0 had a lead concentration of 150 mg/kg, and the deeper sample in the boring SB-22-3.0 had a concentration of 13 mg/kg. The proposed excavation area of approximately 36 ft² to a depth of 1.5 feet bgs encompasses approximately 2 cy of lead-impacted soil.
- **Excavation SB-25:** This excavation area is located around boring SB-25 at the north edge of portable Building AA-336. Sample SB-25-1.0 had an arsenic concentration of 12 mg/kg, and the deeper sample in boring SB-25-3.0 had a concentration of 5.1 mg/kg. The proposed excavation area of approximately 36 ft² to a depth of 1.5 feet bgs encompasses approximately 2 cy of arsenic-impacted soil.
- **Excavation SB-34:** This excavation area is located around boring SB-34 in the parking lot south of Building 200. Sample SB-34-3.0 and its duplicate sample DUP-08 had lead concentrations of 110 and 100 mg/kg, respectively. The deeper sample in boring SB-34-5.0 had a concentration of 8.2 mg/kg. The proposed excavation area of approximately 36 ft² to a depth of 3.5 feet bgs encompasses approximately 4.67 cy of lead-impacted soil.
- **Excavation SB-36:** This excavation area is located around boring SB-36 in the northeast corner of Building AA-2554. Sample SB-36-1.0 had arsenic and lead concentrations of 13 and 92 mg/kg, respectively. The deeper sample in boring SB-34-3.0 had arsenic and lead concentrations of 4.4 and 3 mg/kg, respectively. The proposed excavation area of approximately 36 ft² to a depth of 1.5 feet bgs encompasses approximately 2 cy of arsenic- and lead-impacted soil.

The proposed excavations total approximately 17.33 cy of arsenic- and lead-impacted soils. The approximate volumes of excavated soil in each area are shown in Table 1. Analytical results from the PEA-E investigation have characterized the soil as non-hazardous for disposal purposes.

5 Removal Action Implementation

A licensed remediation contractor will be contracted by the selected construction contractor to provide qualified labor, appropriate equipment, materials, and transportation and disposal services to complete the removal action. LAUSD OEHS will separately contract with an environmental consultant to provide project oversight, air monitoring, health and safety compliance, confirmation sampling, and closure reporting. The construction contractor is required to excavate the locations outlined in this SRP before any other subterranean work is completed in a 20-foot radius of each excavation area. LAUSD OEHS requires each SRP excavation to be conducted when students are not on campus (i.e., no SRP excavations during standard operating hours of 7:30 a.m. through 4:30 p.m. nor scheduled during after-school student activities on school or non-school days). Details of the proposed removal action activities are presented below.



5.1 Site Preparation

Prior to mobilization, Site preparation activities will include public notification, preparing a health and safety plan (HASP), obtaining permits, delineation of excavation areas, and utility clearances.

5.1.1 Public Participation

Prior to beginning fieldwork for the proposed removal action, LAUSD will distribute a Removal Action Work Notice to Garfield HS students and staff, and nearby residents and businesses (i.e., within line-of-sight). The notice will be printed in English and Spanish, laminated, and posted along the fence line of the project. It will provide a general description of the fieldwork that will occur, along with the telephone number of the LAUSD OEHS Project Manager for further information.

5.1.2 Health and Safety Plan

The removal contractor and an environmental consultant shall each prepare their own comprehensive HASPs prior to the implementation of the proposed removal activities at the Site. The intent of a HASP, which includes protocols to be followed during removal activities, is to ensure the health and safety of on-site project employees, subcontractors, visitors, and the public. A HASP identifies required policies, procedures, and systems to be followed by project personnel, and must be followed and signed by all field personnel, subcontractors, vendors, visitors, and agency representatives at the Site. Copies of the HASPs will be readily available during field activities.

All Site workers involved with the soil removal will be required to review and sign the HASP before conducting work at the Site. On the morning of each day of field activities, a health and safety meeting will be conducted to discuss the health and safety issues and concerns related to the specific work, including safety concerns regarding coordination of investigation activities. In addition, Site workers shall meet the training requirements specified in the United States Occupational Safety and Health Administration HAZWOPER Standard (29 CFR 1910.120[e]).³

5.1.3 Permits and Plans

The removal contractor will be responsible for obtaining necessary permits and developing the excavation plans for the removal action.

5.1.4 Delineation of Excavation Areas

Prior to initiating the soil excavation activities, the excavation areas will be marked with spray paint by the environmental consultant. In addition, prior to beginning field work, fencing may be installed around individual excavation areas to prevent unauthorized entry and minimize fugitive dust emissions during work activities by the removal contractor.

³ <https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-H/section-1910.120>.



5.1.5 Utility Clearance

Clearance of utilities and other underground obstacles will be conducted by the removal contractor prior to initiating any subsurface investigation activities. Underground Service Alert (USA) will be notified at least 2 business days prior to commencing work at the Site, and after excavation locations are marked with white paint according to USA requirements. The USA ticket will be maintained as long as work continues at the Site and will be updated as necessary for excavation location adjustments.

A geophysical survey will also be completed in the excavation area to identify and mark out underground utilities potentially including, but not limited to, water lines, natural gas lines, electrical lines, telecommunication lines, sewer lines, and storm drainpipes within the excavation areas. The geophysical survey will utilize electromagnetic and ground penetrating radar to locate the underground utility lines and subsurface features and structures prior to the initiation of intrusive investigation activities.

5.1.6 Site Security

The school is secured by a perimeter fence. An exclusion zone will be maintained around the work areas by barricade and placement of signs and caution tape, as necessary. The contractor will place temporary fencing or caution tape around the excavation area any time the work area is left unattended and at the end of each workday until the excavation activities are completed. No one outside of the consultant field staff, removal contractor employees, or LAUSD OEHS authorized personnel will be permitted within the exclusion zone. The fence surrounding the Site will be closed and locked at the completion of each field day.

5.1.7 Dust Control and Monitoring

Dust control measures will be implemented by the removal contractor to stabilize exposed surfaces and minimize activities that suspend or track dust particles. Soil excavation and handling shall be accomplished in a manner that includes adequate measures to minimize and control dust and spillage of soil within the Site. All work shall follow applicable SCAQMD requirements. Specifically, the removal contractor is responsible for meeting requirements and implementing reasonable best management practices specified in SCAQMD Rules 401 (Visible Emissions) and 403 (Fugitive Dust).⁴ Dust control measures shall include, but not be limited to, the following:

- Wet suppression of exposed soil during excavation, loading, and unloading of contaminated soil;
- Adequately tarping haul trucks transporting contaminated soil before leaving the Site;
- Appropriate measures implemented by the contractor to control track out of soil from the Site onto adjacent paved roads;
- Limited on-site traffic speed, reducing speed on unpaved areas; and

⁴ <https://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-401-visible-emissions.pdf> and <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>, respectively.



- Covering and securing stockpiles and exposed areas at the end of each workday.

In addition to the above dust control management practices, OEHS is requiring upwind and downwind dust monitoring of particulate matter in diameter of 10 micrometers or less (PM10 dust monitoring) during soil removal action implementation.

5.2 Excavation Plan

The scope of the proposed removal action is to excavate approximately 17.33 cy of arsenic- and lead-impacted soil from six areas containing soil which exceeds the screening criteria of 12 and 80 mg/kg for arsenic and lead, respectively. Based on available analytical data, the arsenic- and lead-impacted soil has been characterized as non-hazardous.

5.2.1 Excavation Procedures

Soil will be excavated using conventional equipment such as an excavator or backhoe. Proposed excavation areas which contain asphalt or concrete will be saw cut or broken prior to subsurface work and those materials will be segregated from the soil waste.

Sloping and benching of sidewalls is not anticipated to be required for the excavations as proposed. If the confirmation samples indicate that the excavations would require extending beyond a 4-foot depth, the excavations may require those protective systems. The contractor will have a competent person on Site, knowledgeable of Occupational Safety and Health Administration and California Division of Occupational Safety and Health requirements for excavations and shoring, who will make the final determination whether the excavation shall be sloped, benched, or shored. If shoring is determined to be necessary, the contractor shall develop a shoring plan for review by the consultant.

After the of metals-impacted soil has been removed from the proposed excavation area, field staff will screen soil from all the excavation sidewalls and bottom using a handheld X-ray fluorescence (XRF) analyzer to assess approximate concentrations of arsenic and/or lead prior to collecting confirmation soil samples. If the XRF readings exceed the screening criteria for the specified contaminant, the excavation will be extended laterally or vertically beyond the impacted soil, and the new sidewall or bottom will be screened again. Once the readings on the XRF are below the screening criteria, confirmation soil samples will be collected to verify that all metal impacts have been removed. Confirmation soil sampling procedures are discussed in Section 5.4.

5.2.2 Decontamination Procedures

Protocols will be followed to prevent cross-contamination of impacted soil from equipment used during the removal action. The following decontamination procedures will be used by the removal contractor:

- Excavation equipment will be decontaminated using dry methods, such as brushing off excess soil, prior to leaving the Site.
- Water may be used to decontaminate soiled equipment as needed.
- Transport truck drivers will be required to inspect truck tires for loose soil debris. Excess soil will be removed with a wire brush or broom.



5.3 Soil Management

Impacted soils will be stockpiled, placed in bins or directly loaded onto dump trucks for immediate off-site disposal. Whenever possible, excavated soils will be loaded directly onto transportation trucks. If it is necessary to temporarily store the excavated soil on Site until off-site transportation and disposal are available, the following may apply:

- The staging process will be conducted in a manner to minimize the generation of dust. At the staging areas, excavated soil will be placed on an impermeable barrier base (e.g., plastic sheeting) and covered with tarps or other proper materials (e.g., plastic sheeting) to prevent any run-on and/or dust generation. If significant rainfall is anticipated, the staging areas will be bermed to contain any run-off.
- The temporary on-site storage of excavated soil wastes will be secured until they are ready for loading. Storage of waste for longer than 90 days after it is generated is not anticipated.
- Direct loading may take place concurrently with excavation operations, with access of loaders to the stockpile from outside the excavation areas, while excavation operations deposit impacted soil from the excavation areas to the staging areas.

During non-excavation hours, excavated soil stockpiles will be covered with plastic sheeting or other proper materials. Additional field applications may involve installation of a temporary canopy, liner, or other physical barrier that minimizes movement of materials from the Site by wind, water, or any other mechanism.

5.4 Confirmation Soil Sampling

Confirmation soil sampling within the excavation areas will be conducted upon completion of impacted soil removal at all excavation locations to evaluate whether all impacted soil has been removed. Confirmation soil samples will be collected from the base and/or sidewalls of the excavation from freshly uncovered soil.

When XRF readings indicate arsenic and/or lead is below respective screening criteria, confirmation samples will be collected for laboratory analysis. Sidewall samples will be collected at approximately one sample for each 10 linear feet of sidewall, with a minimum of one sidewall sample collected from each excavation sidewall, which is less than 10 linear feet wide. Each sidewall location will consist of one sample collected at the midpoint in depth (approximately halfway between the excavation floor and the ground surface surrounding the excavation perimeter). Bottom samples will be collected at the rate of one sample for each 400 square feet of excavation area at the midpoint of each interval.

Soil samples will be placed in appropriate containers provided by the analytical laboratory. Each sample container will be labeled with the sample ID number, sample depth, and date of collection. After the samples have been labeled and documented in the chain-of-custody (COC) record, they will be placed in a cooler with ice to maintain an approximate temperature of 4 degrees Celsius for transport to a state-certified laboratory. COC protocol will be followed for all soil samples selected for laboratory analysis. The COC form(s) will accompany the samples from the sampling locality to the laboratory, providing a



continuous record of possession prior to analysis. Duplicate soil samples will be collected at a rate of 10 percent of the total samples.

Confirmation soil samples collected during removal activities will be analyzed for lead and arsenic using United States Environmental Protection Agency Method 6020 for lead and arsenic. If the results of laboratory analysis of confirmation samples indicate soil concentrations exceeding Site screening criteria remain in the subsurface, additional soil excavation will be conducted and additional confirmation samples will be collected to verify removal of the impacted soil.

5.5 Quality Assurance/Quality Control

Quality assurance and quality control (QC) samples will be collected to assess the consistency and performance of the sampling program. The types of field QC samples that will be collected during confirmation sampling for the remedial action are described below.

5.5.1 Field Duplicates

Field duplicate confirmation soil samples will be collected and analyzed to evaluate sampling and analytical precision. Field duplicates are collected and analyzed in the same manner as the primary samples. Agreement between duplicate sample results will indicate good sampling and analytical precision. Field duplicates will be collected at a frequency of 10 percent of the primary soil samples collected. The duplicate sample will be subject to the same laboratory analyses performed on the associated primary sample.

5.5.2 Temperature Blanks

One temperature blank will accompany each cooler containing project samples submitted to the subcontract laboratory. Temperature blanks typically consist of deionized water poured into a glass container. Laboratory personnel will obtain temperature measurements from the temperature blank upon receipt of sample shipment containers, and this measurement will be recorded on the COC.

5.5.3 Laboratory QC Samples and Criteria

Laboratory QC samples are used to ensure that conducted analyses are within QC limits and document the quality of analytical results. The types of QC samples the laboratory will employ depend on the particular methodology used to analyze the samples. Each analytical method has a required QC procedure that must meet laboratory-developed acceptance limits for the data to be considered valid.

5.5.4 Updated Profile Sampling

The laboratory analytical results from the PEA-E investigation have indicated that the soil waste is classified as non-hazardous. However, if the removal contractor determines that additional waste characterization samples are necessary to satisfy the disposal facility, the consultant will collect additional waste characterization samples as directed by the contractor.

5.6 Transportation Plan for Off-Site Disposal

The excavated soil will be managed as outlined in Section 5.3. Analytical data from the PEA-E investigation classified the soil as non-hazardous waste. As soil is excavated, it will be directly loaded onto trucks for transportation off Site or temporarily stockpiled or placed in bins on Site until off-site transportation and disposal is arranged. The non-hazardous soil will be transported to an approved landfill for disposal. The construction contractor will reference LAUSD Specification 01-4524 and consult with OEHS Site Assessment Project Manager for district-specific soil export requirements.⁵

5.7 Backfill and Site Restoration

LAUSD OEHS will provide approval for the completion of the soil removal action for each of the impacted soil areas. The approval will be based on the confirmation soil sampling meeting all objectives of this SRP and disposal of the impacted soil at an approved disposal facility. The removal contractor will be responsible for backfilling the excavated areas, if needed, and removing any site safety security barriers. Any import soil to fill excavation areas must comply with LAUSD Specification 01 4524 (Environmental Import/Export Material Testing) and have approval of the OEHS Project Manager prior to backfill.

5.8 Variances

If deviations from the procedures outlined in this SRP are necessary based on field conditions, the consultant will notify LAUSD OEHS and provide justification for the change. Variances will be documented in field notes and will be discussed in the removal action completion report (RACR).

6 Reporting

A RACR will be prepared by the environmental consultant, under the oversight of a California-licensed Professional Geologist or Civil Engineer, once all removal activities have been completed. The RACR will include but is not necessarily limited to:

- Summary of the removal action activities;

⁵ [https://www.lausd.org/Guide Specifications](https://www.lausd.org/Guide%20Specifications).



- Analytical test results of excavation confirmation soil samples, including quality assurance/QC measures sample results;
- Location(s) and rationale for selection of sampling locations and depths;
- Observations and findings of the environmental controls and measurements;
- Photographic log of removal action activities;
- Final limits of soil excavation with the volumes of soil removed; and
- Documentation showing final disposal of all waste materials generated at the Site.

7 Public Participation

This SRP was prepared as a supporting document for the Initial Study/Mitigated Negative Declaration (IS/MND) by LAUSD for the major modernization project planned at the Site, as required by the California Environmental Quality Act (CEQA). A copy of the Notice of Intent (NOI) for the SRP is provided in Appendix A. Public outreach of the IS/MND and the SRP included the following activities:

- Distributing 2,979 copies of the NOI to the student, parent and guardian list, to all addresses within 0.25 miles of the school, to eight State and local agencies, five elected officials, the Los Angeles Register-Recorder, the County Clerk, and the State Clearinghouse.
- Publishing the NOI in the legal announcement sections of the Daily News (English) and in La Opinión (Spanish) newspapers on April 17, 2024
- Posting digital copies of the Draft Final SRP as an appendix of the public IS/MND for public review at the LAUSD OHES (<https://www.lausd.org/ceqa>) and the California State Clearinghouse (<https://ceqanet.opr.ca.gov/>) websites.
- Providing hard copies of the Draft Final SRP for public review at Garfield High School main office (5101 East 6th Street in East Los Angeles, California).

A virtual public meeting was held via Zoom on Wednesday, May 8, 2024 at 6:00 PM. Comments from the public on the IS/MND were accepted from April 17, 2024 to May 17, 2024. Formal comments sent to LAUSD OEHS pertaining to project design specifications, construction details, and public engagement procedural questions were addressed and are included in Appendix B. None of the comments in the public meeting pertained to the environmental interpretations presented in the PEA-E.

8 References

Chernoff, G., W. Bosan, and D. Oudiz. 2008. *Determination of a Southern California Regional Background Arsenic Concentration in Soil*. California Department of Toxic Substances Control (DTSC). 2009. <https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Bagley-Major-Grading-Plan-Change/Determination-of-Background-Arsenic.pdf>.



- California DTSC. 2006. *Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers*. June 9; revised September 12.
- California DTSC, Human and Ecological Risk Office. 2022. *Human Health Risk Assessment (HHRA) Note 3, DTSC-modified Screening Levels (DTSC-SLs)*. Release Date June 2020 – Revised May 2022.
- California Environmental Protection Agency, DTSC. 2015. *Preliminary Endangerment Assessment Guidance Manual*. January 1994. Revised October 2015.
- Millennium Consulting Associates (Millennium). 2022. *Phase 1 Environmental Site Assessment, Garfield High School, 5101 East 6th Street, Los Angeles, CA 90022*. January 27
- San Francisco Bay Regional Water Quality Control Board. 2019. “Direct Exposure Human Health Risk Levels (Table S-1), Tier 1,” *Environmental Screening Levels (ESLs)*. Revision 2. January 24.
- South Coast Air Quality Management District (SCAQMD). 1984. “Rule 401. Visible Emissions.” Adopted February 4, 1977, last amended March 2, 1984. <https://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-401-visible-emissions.pdf>.
- . 2005. “Rule 403. Fugitive Dust.” Adopted May 7, 1976, last amended June 3, 2005. <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.
- . 2021. “Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants.” June 4. <https://www.aqmd.gov/home/rules-compliance/compliance/rule-1466>.
- Terraphase. 2023a. *Preliminary Environmental Assessment-Equivalent Work Plan, James A. Garfield High School, 5101 E 6th St, East Los Angeles, CA 90022*. March 29.
- . 2023b. *Preliminary Environmental Assessment-Equivalent Report, James A. Garfield High School, 5101 E 6th St, East Los Angeles, CA 90022*. July 3.
- United States Environmental Protection Agency. 2002. *Calculating Upper Confidence Limits for Exposure Point Concentrations at Hazardous Waste Sites*. Office of Emergency and Remedial Response. December.
- . 2022. *Regional Screening Level (RSL) Resident Soil Summary Table (TR=1E-06, HQ=1)*. November. <https://www.dir.ca.gov/dosh/acru/acruregistration.htm>

Table

- 1 Proposed Soil Excavation Volume Estimations



Table 1
Proposed Soil Excavation Volume Estimations

Soil Removal Plan
 James A. Garfield High School
 5101 E 6th Street, East Los Angeles, California 90022

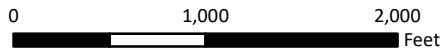
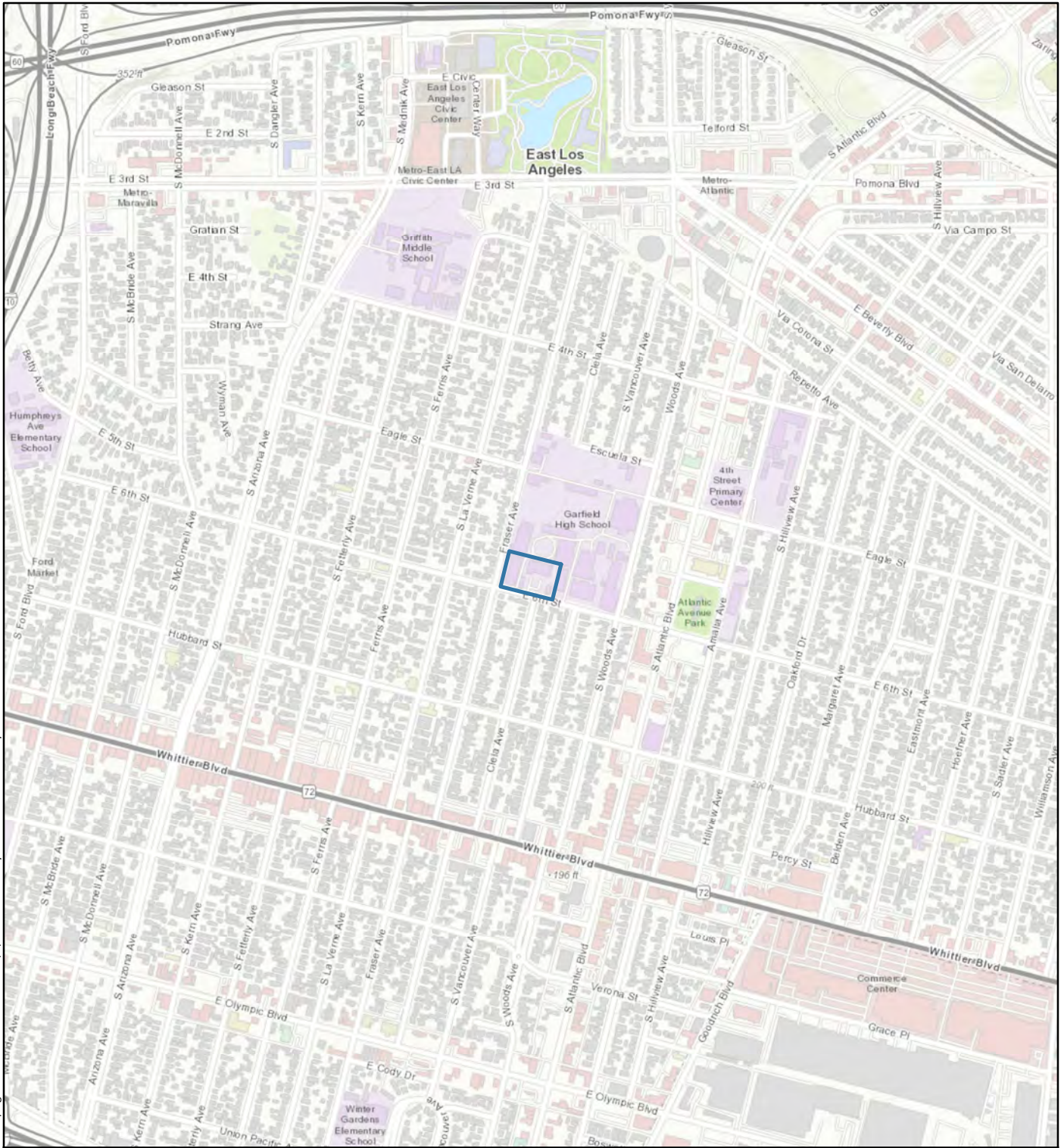
Primary Boring/Boring Group ID	COPCs Above Screening Criteria	Proposed Excavation Surface Area (square feet)	Proposed Excavation Depth (feet bgs)	Proposed Soil Excavation Volume (cubic yards)	Confirmation Sampling Recommendations
SB-13	Arsenic	36	1.5	2	Collect confirmation samples from sidewalls at approximately one sample for each 10 linear feet of sidewall, with a minimum of one sample per each excavation sidewall and one bottom sample for each 400 square feet at the midpoint of each interval
SB-14	Lead	36	3.5	4.67	
SB-22	Lead	36	1.5	2	
SB-25	Arsenic	36	1.5	2	
SB-34	Lead	36	3.5	4.67	
SB-36	Arsenic, Lead	36	1.5	2	
Total Soil Volume				17.33	

Note:
 COPC = chemical of potential concern
 bgs = below ground surface
 Proposed excavation extents are 6 feet long by 6 feet wide.

Figures

- 1 Site Location
- 2 Site Layout
- 3 Arsenic and Lead Concentrations Exceeding Screening Criteria
- 4 Proposed Excavations






1 inch = 1,000 feet



Legend

 Site Boundary

Base Map: ESRI World Topographic Map
(data providers include HERE, Garmin, USGS, et al.)

SAFETY FIRST



CLIENT: LAUSD

PROJECT: 5101 E 6th Street,
Los Angeles, CA 90022

PROJECT NUMBER: S030.064.001

Site Location

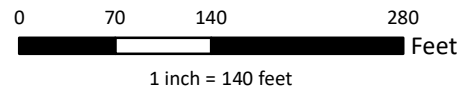
FIGURE 1

File: N:\GIS\Prj\S030 LAUSD\5030_056_Garfield HS\WXDS\20230501\Figure 2 - Site Layout.mxd, 5/15/2023 Created by: Summer Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



- Legend**
- Garfield High School
 - Development Zone

Aerial Imagery Source: Nearmap January 26, 2023



SAFETY FIRST



CLIENT:	LAUSD
PROJECT:	5101 E 6th Street, Los Angeles, CA 90022
PROJECT NUMBER:	S030.056.004

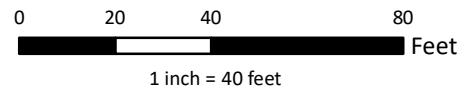
Site Layout

FIGURE 2

File: N:\GIS\Projects\5030 LAUSD\5030_056_Garfield_HSV\XDS\20230515\Figure 4 - Arsenic and Lead Soil Exceedances.mxd, 5/25/2023, Created by: Summer, Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



Aerial Imagery Source: Nearmap January 26, 2023



SAFETY FIRST



CLIENT: LAUSD

PROJECT: 5101 E 6th Street, Los Angeles, CA 90022

PROJECT NUMBER: S030.064.001

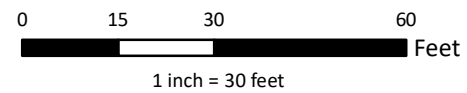
Arsenic and Lead Concentrations Exceeding Screening Criteria

FIGURE 3

File: N:\GIS\Projects\5030 LAUSD\5030_056_Garfield HS\WXDS\20230108\Figure 3 - Proposed Excavations.mxd, 1/9/2024, Created by: S.Turner, Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



Aerial Imagery Source: Nearmap January 26, 2023



 	CLIENT:	LAUSD	Proposed Excavations FIGURE 4
	PROJECT:	5101 E 6th Street, Los Angeles, CA 90022	
	PROJECT NUMBER:	S030.064.001	

Appendix A

Initial Study/Mitigated Negative Declaration Notice of Intent





**NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND
NOTICE OF PUBLIC COMMENT PERIOD FOR
PRELIMINARY ENVIRONMENTAL ASSESSMENT – EQUIVALENT
AND SOIL REMOVAL PLAN**



TO: Agencies, Organizations, and Interested Parties

PROJECT TITLE: James A. Garfield High School Major Modernization Project

SUBJECT: Notice of Intent to Adopt a Mitigated Negative Declaration and Notice of Public Comment Period for Preliminary Environmental Assessment-Equivalent (PEA-E) and Soil Removal Plan (SRP)

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 James A. Garfield High School Major 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 after the implementation of mitigation measures and a Mitigated Negative Declaration (MND) 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) and a Soil Removal Plan (SRP) has been prepared for the proposed Project and is available for review.

PROJECT LOCATION: The 19.3-acre Garfield High School (HS) campus is located at 5101 East Sixth Street in East Los Angeles, an unincorporated area within Los Angeles County.

PROJECT DESCRIPTION: The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at Garfield HS through building replacement, renovation, and modernization to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project includes the demolition of two permanent buildings and two portable buildings, demolition of a second-story pedestrian bridge, construction of a staff parking lot, and construction of a new permanent building that provides adequate learning spaces and support areas. Additionally, the proposed Project includes upgrades to and replacement of aging utilities and infrastructure, Internet Protocol (IP) convergence, and new landscaping and hardscaping. Limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act (ADA) and seismic retrofit pursuant to California Assembly Bill 300 would also be implemented. The PEA-E and SRP 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-MND, PEA-E, and SRP are available electronically for public review at the locations listed below.


- Garfield High School (Main Office) - 5101 E 6th St, East Los Angeles, CA 90022
- LAUSD Office of Environmental Health and Safety websites:
 - CEQA IS-MND (<https://www.lausd.org/ceqa>)
 - PEA-E and SRP (<https://www.lausd.org/siteassessment>)
- California State Clearinghouse (<https://ceqanet.opr.ca.gov/>)

PUBLIC REVIEW PERIOD: The IS-MND (prepared pursuant to CCR, Title 14, Section 15073[a]), PEA-E, and SRP are available for public review and comment from April 17, 2024 to May 17, 2024.

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

THIS NOTICE WAS POSTED
ON April 17 2024
UNTIL May 17 2024
REGISTRAR – RECORDER/COUNTY CLERK

CEQA and PEA-E Questions and Comments
Los Angeles Unified School District
Office of Environmental Health and Safety
Attention: Christy Wong, CEQA Project Manager
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017
Email: CEQA-comments@lausd.net
Please include "Garfield HS Major Mod" in the subject line.

2024 083291

FILED
Apr 17 2024
Dean C. Logan, Registrar – Recorder/County Clerk
Electronically signed by TODD TRAN

COMMENT MEETING: LAUSD will hold a virtual public meeting on **May 8, 2024 at 6:00pm**. Please connect via Zoom or by phone:

- Zoom Online Meeting Link: <https://lausd.zoom.us/j/81131182486>; Zoom Online Webinar Meeting ID #: **811 3118 2486**
- Phone # Dial In: +1 213-338-8477; ID# **811 3118 2486**

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: <https://www.lausd.org/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 <https://www.lausd.org/boe>.



AVISO DE INTENCIÓN DE ADOPTAR UNA DECLARACIÓN NEGATIVA MITIGADA Y DE UN PERIODO DE COMENTARIOS PÚBLICOS PARA LA EVALUACIÓN AMBIENTAL PRELIMINAR — EQUIVALENTE Y EL PLAN DE REMOCIÓN DE TIERRA



PARA: Agencias, organizaciones y partes interesadas

TÍTULO DEL PROYECTO: Proyecto importante de modernización de la Escuela Preparatoria James A. Garfield

ASUNTO: Aviso de Intención de Adoptar una Declaración Negativa Mitigada y de un Periodo de Comentarios Públicos para la Evaluación Ambiental Preliminar-Equivalente (PEA-E, por sus siglas en inglés) y el Plan de Remoción de Tierra (SRP, por sus siglas en inglés)

Por la presente se notifica que el Distrito Escolar Unificado de Los Ángeles (LAUSD o Distrito), como la agencia líder en virtud de la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés), ha preparado un Estudio Inicial (IS, por sus siglas en inglés) para el proyecto principal de modernización de la Escuela Preparatoria James A. Garfield (proyecto propuesto), de conformidad con la CEQA (Código de Recursos Públicos [PRC, por sus siglas en inglés]), División 13, Sección 21000 y siguientes. [Estatutos de la CEQA] y el Código de Regulaciones de California [CCR, por sus siglas en inglés], Título 14, División 6, Capítulo 3, Sección 15000 y siguientes. [Directrices de la CEQA]). Con base en las conclusiones del IS, el LAUSD determinó que el proyecto propuesto no tendría impactos adversos significativos en el medio ambiente después de la implementación de las medidas de mitigación y es apropiada una Declaración Negativa Mitigada (MND, por sus siglas en inglés). El Distrito está proporcionando un aviso público de conformidad con las secciones 15072 y 15073 del Título 14, Capítulo 3, del CCR, en su forma enmendada. Se notifica además que se ha preparado una Evaluación Ambiental Preliminar - Equivalente (PEA-E, por sus siglas en inglés) y un Plan de Remoción de Tierra (SRP, por sus siglas en inglés) para el proyecto propuesto y están disponibles para su revisión.

UBICACIÓN DEL PROYECTO: El campus de la Escuela Preparatoria Garfield (HS) de 19.3 acres está ubicado en 5101 East Sixth Street en el Este de Los Ángeles, un área no incorporada dentro del Condado de Los Ángeles.

DESCRIPCIÓN DEL PROYECTO: El proyecto propuesto está diseñado para abordar las preocupaciones físicas más críticas de los edificios y terrenos de Garfield HS mediante el reemplazo, la renovación y la modernización de edificios para proporcionar instalaciones seguras y mejor alineadas con el programa de instrucción actual. El proyecto propuesto incluye la demolición de dos edificios permanentes y dos edificios portátiles, la demolición de un puente peatonal en el segundo piso, la construcción de un estacionamiento para el personal y la construcción de un nuevo edificio permanente que ofrecerá áreas de apoyo y espacios de aprendizaje adecuados. Además, el proyecto propuesto incluye mejoras y reemplazos de los servicios públicos e infraestructuras antiguas, la convergencia del Protocolo de Internet (IP, por sus siglas en inglés) y nuevos jardines y paisajismo. También se implementaría una modernización limitada de las estructuras existentes, incluidas las instalaciones accesibles, de conformidad con los requisitos de la Ley para Estadounidenses con Discapacidades (ADA, por sus siglas en inglés) y la modernización sísmica de conformidad con el Proyecto de ley 300 de la Asamblea de California. El PEA-E y el SRP presentan los hallazgos de las investigaciones de evaluación del sitio realizadas para este proyecto propuesto. El campus no figura en ninguna de las listas compiladas en virtud de la Sección 65926.5 del Código de Gobierno.

DISPONIBILIDAD DE DOCUMENTOS: El IS-MND, el PEA-E y el SRP están disponibles electrónicamente para su revisión pública en las ubicaciones que se indican a continuación.

- Escuela Preparatoria Garfield (Oficina principal) - 5101 E 6th St, Este de Los Ángeles, CA 90022
- Sitios web de la Oficina de Salud y Seguridad Ambiental del LAUSD:
 - CEQA IS-MND (<https://www.lausd.org/ceqa>)
 - PEA-E and SRP (<https://www.lausd.org/siteassessment>)
- Centro de Intercambio de Información del Estado de California (<https://ceqanet.opr.ca.gov/>)

PERIODO DE REVISIÓN PÚBLICA: El IS-MND (preparado de conformidad con el CCR, Título 14, Sección 15073 [a]), el PEA-E y el SRP están disponibles para su revisión y comentarios públicos del 17 de abril de 2024 al 17 de mayo de 2024.

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

Preguntas y comentarios sobre CEQA y PEA-E
Distrito Escolar Unificado de Los Ángeles
Oficina de Salud y Seguridad Ambiental
Atención: Christy Wong, Gerente de proyectos de CEQA
333 South Beaudry Avenue, 21st Floor,
Los Angeles, CA 90017
Correo electrónico: CEQA-comments@lausd.net
Incluya «Garfield HS Major Mod» en la línea de asunto.

REUNIÓN PARA LA PRESENTACIÓN DE COMENTARIOS: El LAUSD llevará a cabo una reunión pública virtual el 8 de mayo de 2024 a las 6:00 p.m. Conéctese a través de Zoom o por teléfono:

- Enlace a la reunión en línea de Zoom: <https://lausd.zoom.us/j/81131182486>; número de identificación de la reunión del seminario web en línea de Zoom: 811 3118 2486
- Número de teléfono: +1 213-338-8477; número de identificación 811 3118 2486

Se anima a todas las agencias, organizaciones y partes interesadas a asistir a la reunión.

AUDIENCIA DE LA JUNTA DE LAUSD: Se publicará información adicional sobre el proyecto propuesto en el sitio web de OEHS del Distrito: <https://www.lausd.org/ceqa>. La Junta de Educación del LAUSD (Junta) considerará este tema durante una reunión programada. Visite el sitio web de la Junta del LAUSD para ver la fecha y hora de la reunión en <https://www.lausd.org/boe>.

Appendix B

James A. Garfield High School Responses to Comments



July 2024 | Response to Comments
State Clearinghouse No. 2024040744
James A. Garfield High School
Major 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: Christy Wong, CEQA Project Manager
213.241.3394

Prepared by:

WSP USA, Inc.
9177 Sky Park Court
San Diego, California 92123
Contact: Nick Meisinger, CEQA Project Manager
805.252.0060



OEHS
OFFICE OF ENVIRONMENTAL HEALTH & SAFETY

Table of Contents

Section	Page
1. INTRODUCTION	1
1.1 Introduction.....	1
1.2 Public Engagement.....	1
1.3 CEQA Requirements Regarding Comments and Responses	3
2. RESPONSE TO COMMENTS.....	4

1. Introduction

1.1 INTRODUCTION

This document includes the public comments received on the Initial Study prepared for the James A. Garfield High School Major Modernization Project (Project) and provides Los Angeles Unified School District's (LAUSD's) responses to these comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code, Division 13, Sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et seq.), a lead agency has no affirmative duty to prepare formal responses to comments on an Initial Study. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the Initial Study. In the spirit of public disclosure and engagement, LAUSD – as the lead agency for the Project – has responded to all written comments submitted during the 30-day public review period.

1.2 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration (MND). Per CEQA Guidelines Section 15072 and 15073, LAUSD determined that an MND would be appropriate for the Project and circulated a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and the Initial Study. The public review period for this CEQA-compliant document was from April 17, 2024 to May 17, 2024. Public outreach included the following methods:

1.2.1 Newspaper Publications

- NOI published in the legal announcement section of the Daily News (English) on April 17, 2024.
- NOI published in the legal announcement section of the La Opinión (Spanish) on April 17, 2024.

1.2.2 Mailings

- NOI sent to eight State and local agencies, five elected officials, the Los Angeles Registrar-Recorder / County Clerk, and the State Clearinghouse.
- NOI sent to student / parent guardian addresses and all addresses within a 0.25-mile radius of the Project site and – 2,979 mailings.

1. Introduction

1.2.3 Document Availability

The NOI and Initial Study were available for review at the following locations:

- Garfield High School (Main Office) (5101 E 6th St, East Los Angeles, CA 90022)
- LAUSD Office of Environmental Health and Safety website (<https://www.lausd.org/ceqa>)
- California State Clearinghouse (<https://ceqanet.opr.ca.gov/>)

1.2.4 Community Outreach

A virtual public meeting was held via Zoom on May 8, 2024 at 6:00 PM. The meeting provided agencies and the public with an opportunity to comment on the Project and the Initial Study. The meeting included a presentation of the proposed Project, a summary of findings for CEQA and the Preliminary Environmental Assessment-Equivalent (PEA-E), and a question and answer (Q&A) session. During the Q&A session, commenters had inquiries on the following topics:

- Design (including questions regarding the architect selection process, classroom and support spaces, Americans with Disabilities Act of 1990 (ADA) improvements, parking, athletics facilities, landscaping etc.)
- Construction (including questions regarding schedule, safety precautions, traffic control, interim housing)
- Public engagement process

Those comments that were received (listed above) were addressed by LAUSD during the meeting. No other formal comments were received via letter or e-mail from community members. Additionally, none of the Zoom comments pertained to the adequacy of the environmental analyses contained in this Initial Study. As such, pursuant to CEQA Guidelines Section 15204(b), Zoom comments from the May 8, 2024 meeting are not included in this document and do not warrant additional written responses.

1.2.5 Document Format

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and the content of this document.

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the Initial Study, copies of comments received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment has been reproduced and

assigned an alphabetical letter. Individual comments have been provided, followed by responses from LAUSD with references to the corresponding comment number.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments on an Initial Study and reminds persons and public agencies that the focus of review and comment should be “on the proposed findings that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, they should: (1) identify the specific effect; (2) explain why they believe the effect would occur; and (3) explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an Initial Study is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204(c) advises, “[re]viewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

CEQA Guidelines Section 15204(d) also states, “[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” CEQA Guidelines Section 15204(e) states, “[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only 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.

2. Response to Comments

2. Response to Comments

This section provides all written comments received on the Initial Study and LAUSD's response to each comment.

Table 1
Summary of Comments Received

Reference	Commenting Person / Agency	Date of Comment	Page Number
Written Comment Letters			
A	California Department of Transportation	May 17, 2024	6
B	Department of Toxic Substances Control	May 10, 2024	9

2. Response to Comments

COMMENT A – Miya Edmonson, California Department of Transportation (Caltrans) (2 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 288-3582
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



Making Conservation
a California Way of Life

May 17, 2024

Christy Wong
Los Angeles Unified School District
333 S. Beaudry Ave, 21st Floor
Los Angeles, CA 90017

RE: James A. Garfield High School Major
Modernization Project Mitigated
Negative Declaration (MND)
GTS # 07-LA-2024-04510
SCH # 2024040744
Vic. LA 60/PM R3.959
LA 710/PM 24.262
LA 5/PM 12.971

Dear Christy Wong:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at Garfield HS through building replacement, renovation, and modernization to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project includes demolishing two permanent buildings and two portable buildings, demolishing a second-story pedestrian bridge, constructing a staff parking lot, and constructing a new permanent building that provides adequate learning spaces and support areas. Additionally, the proposed Project includes upgrading and replacing aging utilities and infrastructure, Internet Protocol (IP) convergence, and new landscaping and hardscaping. Limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act (ADA) and seismic retrofit pursuant to California Assembly Bill 300 would also be implemented. The PEA-E and SRP present 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. The Los Angeles Unified School District is the Lead Agency under the California Environmental Quality Act (CEQA).

The closest state facilities are SR-60, I-710, and I-5. After reviewing the project's documents, Caltrans has the following comments:

To meet the goals and objectives of community placemaking and safe urban design, Caltrans encourages the Lead Agency to incorporate multi-modal infrastructure along and within the school boundaries for people walking, riding bicycles, and riding transit. This

A-1

"Provide a safe and reliable transportation network that serves all people and respects the environment."

2. Response to Comments

Christy Wong
May 17, 2024
Page 2 of 2

infrastructure should include ADA-compliant design, adequate sidewalks, high visibility crosswalks, class IV bike lanes, and bike parking to best create a fully accessible Complete Street. | A-1
Cont.

Caltrans will require an Encroachment Permit for work performed within the State Right-of-way. Caltrans recommends that large-size truck travel be limited to off-peak commute hours. Caltrans requires a permit for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. | A-2

Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review. | A-3

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04510.

Sincerely,

Anthony Higgins for

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

2. Response to Comments

A. Response to Comments from Miya Edmonson, Caltrans, dated May 17, 2024

- A-1 Comment noted. The proposed Project involves ADA accessibility improvements and increases the number of parking stalls on-campus (refer to Section 3.2.3, *Site Access, Circulation, and Parking*). However, the proposed Project does not include any off-site improvements.
- A-2 Comment noted. LAUSD would obtain an Encroachment Permit for work performed within the State Right-of-Way and comply with all requirements for State highways. Additionally, the District's Standard Conditions of Approval (Standard Conditions or SCs), limits construction-related trucks to off peak commute periods (refer to SC-T-4 in Section 4.18, *Transportation and Circulation* of the Initial Study).
- A-3 Comment noted. Refer to the Response to Comment A-2.

2. Response to Comments

COMMENT B – Tamara Purvis, Department of Toxic Substances (DTSC) (3 pages)



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control
Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

May 10, 2024

Christy Wong
CEQA Project Manager
Los Angeles Unified School District
333 S Beaudry Ave, 21st Floor
Los Angeles, CA 90017
cp-christy.wong@lausd.net

RE: MITIGATED NEGATIVE DECLARATION (MND) FOR THE JAMES A. GARFIELD
HIGH SCHOOL MAJOR MODERNIZATION PROJECT, DATED APRIL 17, 2024
STATE CLEARINGHOUSE # [2024040744](#)

Dear Christy Wong,

The Department of Toxic Substances Control (DTSC) received a MND for the James A. Garfield High School Major Modernization Project (Project). The proposed Project includes the demolition of two permanent buildings and two portable buildings, demolition of a second-story pedestrian bridge, construction of a staff parking lot, and construction of a new permanent building that provides adequate learning spaces and support areas. Additionally, the proposed Project includes upgrades to and replacement of aging utilities and infrastructure, Internet Protocol (IP) convergence, and new landscaping and hardscaping. Limited modernization of existing structures including accessible facilities consistent with the requirements of the Americans with Disabilities Act (ADA) and seismic retrofit pursuant to California Assembly Bill

♻️ Printed on Recycled Paper

2. Response to Comments

Christy Wong
May 10, 2024
Page 2

300 would also be implemented. Based on our review, DTSC requests consideration of the following comments.

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Construction](#) webpage.

B-1

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 [Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers](#).

B-2

3. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within DTSC's and U.S. Environmental Protection Agency (USEPA) Regional Screen Levels (RSLs) for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill

B-3

2. Response to Comments

Christy Wong
May 10, 2024
Page 3

material meets screening levels outlined in the [PEA](#) for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC's Human and Ecological Risk Office \(HERO\) webpage](#).

B-3
Cont.

DTSC appreciates the opportunity to comment on the MND for the Project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process](#) to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

2. Response to Comments

B. Response to Comments from Tamara Purvis, DTSC, dated May 10, 2024

- B-1 Comment noted. LAUSD intends to remove arsenic-contaminated soils south of Building 100 (SB-13), north of portable AA-336 (SB-25), and near the northeast corner of portable AA-2254 (SB-36). Additionally, LAUSD intends to remove lead-contaminated soils surrounding Building 200 (SB-14, SB-22, and SB-34) and northeast of portable AA-2254 (SB-36). For soil sample locations, refer to Section 4.9, *Hazards and Hazardous Materials* of the Initial Study and Appendix H, *Preliminary Environmental Assessment Equivalent (PEA-E) Report* of the Initial Study. Lead and arsenic impacted areas would be managed in accordance with the Soil Removal Plan (SRP), which has been included as Appendix I for reference. This plan would govern delineation, excavation, segregation, and proper handling of soil with arsenic and lead exceedances discovered during the PEA-E.
- B-2 Comment noted. Prior to any demolition, remodeling, and/or renovation activities at the Project site, untested suspect asbestos-containing materials (ACMs), lead-based paints (LBP) and other lead-containing materials (LCMs), and potential Polychlorinated Biphenyls (PCB)-containing building material that may be disturbed would be sampled and analyzed in accordance with applicable regulations. Abatement of known and suspect ACMs, LBP and other LCMs, and potential PCB-containing caulk and paints and any adjacent PCB-impacted building or construction materials should be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs and LBP and other LCMs) in accordance with applicable regulations.
- B-3 Comment noted. Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, *Environmental Import/Export Materials Testing*. This specification has the requirements for the sampling, testing, transporting, and certifying of imported fill materials or exported fill materials from school sites.