

July 2024 | Mitigation, Monitoring, and Reporting Program
State Clearinghouse No. 2024040744
James A. Garfield High School
Major Modernization Project



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1. Introduction

1.1 PURPOSE

This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to implement and monitor compliance with the mitigation measures identified by Los Angeles Unified School District (LAUSD) for the major modernization project at James A. Garfield High School (Project).

This MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code, which states:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
 - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate, or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

The Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural designs are subject to review and approval by the California Division of the State Architect (DSA). The Project is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),¹ LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.²

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce greenhouse gas (GHG) emissions from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy

¹ California Green Building Standards Code, Title 24, Part 11.

² The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

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and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. The SCs for District Construction, Upgrade, and Improvement Projects were adopted by the Board on December 12, 2023.³ SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the Office of Environmental Health and Safety (OEHS) CEQA team to offset potential environmental impacts. The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the LAUSD Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the SCs).

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including on-site treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, water-wise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project design features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations, CHPS prerequisite criteria, PDFs, and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

³ LAUSD. Los Angeles Unified School District Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects
https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/135/ceqa/2023_Standard_Conditions_UPDATE_Final.pdf

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- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, State, and local laws and regulations, PDFs, and SCs.

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.⁴ Federal, State, regional, and local laws, regulations, plans, and guidelines, CHPS criteria, PDFs, and SCs are considered part of the proposed Project and are included in the environmental analysis.

1.2 PROJECT LOCATION

Garfield HS is at 5101 East Sixth Street within the neighborhood of East Los Angeles, an unincorporated community of Los Angeles County (Assessor Parcel Numbers [APNs] 5248-021-901, 5248-010-904, and 5248-012-914). The Campus sits on a 19.3-acre site bound by East Sixth Street to the south, South Woods Avenue to the east, residences and Escuela Street to the north, and Fraser Avenue to the west.

1.3 SUMMARY 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.

1.4 ENVIRONMENTAL IMPACTS

1.4.1 No Impact and Less Than Significant Impact

The following environmental resource areas were identified as no impact or less than significant in the Initial Study.

⁴ CHPS. CHPS Criteria. <https://chps.net/chps-criteria>.

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

1.4.2 Less Than Significant with Mitigation

The Initial Study found that the Project would result in a potentially significant impact without mitigation to Cultural Resources. Table 1 lists the mitigation measure that was incorporated into the Project. With the incorporation of mitigation measure MM-CUL-1, impacts to Cultural Resources would be less than significant.

2. Monitoring and Reporting Requirements

2.1 INTRODUCTION

CEQA requires adoption of a reporting or monitoring program for the conditions of Project approval that are necessary to mitigate, reduce, or avoid significant impacts on the environment.⁵

The purpose of the MMRP is to ensure the effective implementation of the measures for the Project. In addition, it provides a means for identifying corrective actions, if necessary, before irreversible environmental damage occurs. As the Lead Agency, LAUSD is responsible for review and approval of the Project and adoption of the MMRP.

The program requirements outlined in Table 1 include:

- Mitigation measures;
- Responsibility for implementation;
- Implementation phase (i.e., pre-construction, construction, prior to occupancy, post-occupancy);
- Responsibility for monitoring; and
- Completion date and initials of monitoring party.

2.2 CATEGORIZED MATRIX

Project-specific mitigation measures have been categorized in Table 1. The table serves as the basis for scheduling the implementation of and compliance with mitigation measures.

⁵ Public Resources Code, Section 21081.6.

2. Monitoring and Reporting Requirements

Table 1
Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
CULTURAL RESOURCES				
<p>MM-CUL-1 LAUSD shall require the Construction Contractor to develop and implement an interpretative outdoor program:</p> <ul style="list-style-type: none"> • Outdoor Classroom/History Garden. The Construction Contractor shall develop an outdoor classroom/history garden that includes the following minimum requirements: <p>The garden shall be a minimum of 2,000 sf in size, intended to be an area where students can collectively gather and learn as a classroom or collaborate in smaller groups surrounded by a natural, planted backdrop. The outdoor classroom shall include permeable pavers, seating for 32 students, and electrical outlets, wifi, and a blackboard.</p> <p>Features of the garden are intended to commemorate the events, people, and places associated with Garfield HS, particularly with regard to the school's role in the Blowouts and the Chicano Civil Rights Movement in Los Angeles. At a minimum, the garden shall incorporate interpretive panels, display cases, and plaques, as described below. These</p>	LAUSD FSD / OEHS ⁶	During the design of and prior to the construction of any new buildings on the Campus	LAUSD FSD / OEHS	

⁶ FSD – Facilities Services Division
 OEHS – Office of Environmental Health and Safety

2. Monitoring and Reporting Requirements

Table 1
Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>features could be placed throughout campus as well.</p> <ol style="list-style-type: none"> 1. Opportunities to Communicate. Outdoor spaces shall be designed to encourage the exchange of stories and information pertinent to the historic events that took place on the campus. These spaces shall be open to students, faculty, and campus visitors (including alumni and the general public). 2. Interpretive Panels. The Construction Contractor shall develop content for interpretive panels to be placed in the History Garden and other locations on campus at Garfield HS, as well as the other East Los Angeles schools that participated in the Blowouts. Panels should include approximately 200 words of narrative text, as well as maps, photographs, and images that tell the story of the Blowouts. Permanent panels shall be installed in the History Garden, as well as throughout the campus referring to historic events associated with the Blowouts. 				