

February 2022 | Final Environmental Impact Report
State Clearinghouse No. 2018041074

OLD SCHOOLHOUSE REMOVAL

Azusa Unified School District

Prepared for:

Azusa Unified School District

Contact: Arturo Ortega
Superintendent
546 South Citrus Avenue
Azusa, California 91702
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Prepared by:

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Table of Contents

| Section | Page |
|--|-------------|
| 1. INTRODUCTION..... | 1-1 |
| 1.1 INTRODUCTION..... | 1-1 |
| 1.2 FORMAT OF THE FEIR..... | 1-1 |
| 1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES | 1-2 |
| 2. RESPONSE TO COMMENTS | 2-1 |

Table of Contents

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Administrative Code Section 15000 et seq.).

According to CEQA Guidelines, Section 15132, the FEIR shall consist of:

- (a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;
- (b) Comments and recommendations received on the DEIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies comments on the DEIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

This document contains responses to comments received on the DEIR for the Old Schoolhouse Removal during the public review period, which began June 12, 2019, and closed July 26, 2019. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency. This document and the circulated DEIR comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

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

Section 2, Response to Comments. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, the comment letters received have been reproduced and assigned a letter, A1, A2 and A3. Individual comments have been numbered for the letter, and the letter is followed by responses with references to the corresponding comment number.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of DEIRs should be “on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. 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 EIR is determined in terms of what is reasonably feasible. ...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to 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 EIR.”

CEQA Guidelines Section 15204 (c) further advises, “Reviewers 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.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This 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.”

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the Azusa Unified School District (District) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the District's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

| Number Reference | Commenting Person/Agency | Date of Comment | Page No. |
|-------------------------------------|---|-----------------|----------|
| Agencies & Organizations | | | |
| A1 | Azusa Historical Society, Board of Directors | July 18, 2019 | 2-3 |
| A2 | City of Azusa, Matt Marquez, Economic and Community Development Director | July 29, 2019 | 2-7 |
| A3 | Governor's Office of Planning and Research, State Clearinghouse, Scott Morgan, Director | July 29, 2019 | 2-13 |

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LETTER A1 – Azusa Historical Society, Board of Directors (4 pages)



July 18, 2019

To Whom It May Concern,

- A1-1 We, the Azusa Historical Society Board of Directors, are solely opposed to the demolition of the Azusa Unified School District's Old School House located at 403 North Angeleno Avenue in Azusa, California.
- A1-1 As the last remaining Azusa school house circa early 1900's it represents many different aspects of Azusa history. The structure was originally built at the old Riley School location between Soldano Avenue and Pasadena Avenue on 4th Street. The building, in and of itself, is considered valuable from an architectural standpoint due to it being one of the only surviving single room wood framed school houses in the San Gabriel Valley, and in 1946 was saved from demolition by the Azusa School Board of Trustees due to its historical value and relocated to its present location where it has stood for the last 72 years.
- A1-2 As you may be aware, the Azusa Historical Society has frequently provided tours of the Museum located at the Durrell House in Veteran Park to local elementary school children. One of the most appealing rooms to the school children is the mock up of the turn of the century class room. It is here where the children can see for themselves how much times have changed from the classroom of the past to the classroom of the current. We believe that there is an opportunity to embrace this very unique situation by preserving the structure and creating a partnership between the Azusa Historical Society and the Azusa Unified School District so that we may actually allow our students to literally step into history. Where other local historical society's and preservation groups have tried to recreate and present a sense of the past in settings fit for school tours and research, we know that we have the "real deal."
- A1-2 The Old School House is a history lesson for us all from which to learn. This structure represents a time when equality was not for all and the building itself allows us the opportunity to step back in time to a period when segregation was a fact and when Mexican students were separated from their peers and sent to this school house to learn English and to participate in "Americanization" classes. The building also has importance from a governmental standpoint as the only other polling location, other than City Hall, in the early days of the City. We believe due to its local significance as a cultural and historical landmark, that it also meets the criteria for State designation.
- A1-3 We strongly urge you to consider the preservation and restoration of this historic structure. Once this building is gone, it can never be brought back. For over 116 years this structure has stood witness to the growth and changes within the City of Azusa, we respectfully ask that we decide it should continue to stand into the future.
- A1-3 Sincerely
- A1-3 The Azusa Historical Society Board of Directors

Attachment to Azusa Historical Society letter, page 1



Azusa Unified School District

546 South Citrus Avenue . P.O. Box 500 . Azusa, CA 91702-0500
Phone (626) 967-6211; FAX (626) 858-6123

Board of Education

| | |
|------------------------|----------------|
| Helen Jaramillo | President |
| Xilomin Cruz-Gonzalez | Vice President |
| Paul Naccachian | Clerk |
| Jeri Bibbles-Vogel | Member |
| Yolanda Rodriguez-Peña | Member |
| Linda Kaminski, Ed.D | Superintendent |

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT *Old Schoolhouse Removal Project*

NOTICE IS HEREBY GIVEN that Azusa Unified School District (District), as lead agency for the project, has completed a Draft EIR in compliance with the California Environmental Quality Act (CEQA). The purpose of this notice is to (1) serve the public Notice of Availability (NOA) of the Draft EIR pursuant to the CEQA Guidelines Section 15087, and (2) advise and solicit comments regarding the content of the Draft EIR.

Project Title: Old Schoolhouse Removal

Project Location: The project site is at 403 North Angeleno Avenue in the City of Azusa, Los Angeles County, California. It is on the southeast corner of Slauson Middle School (340 West 5th Street).

Proposed Project: The proposed project involves removing the Old Schoolhouse structure, removing chain-link fencing around the structure, capping utility systems connected to the structure, and improving the footprint of the Old Schoolhouse and surrounding area with either landscape or parking.

The District is considering two options to remove the Old Schoolhouse:

- *Sell the Old Schoolhouse.* The District would offer to sell the Old Schoolhouse in its current state to a successful buyer who can preserve the structure in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- *Demolish the Old Schoolhouse.* If a successful buyer is not identified or if the structure is not removed from District property (i.e., project site) by the successful buyer prior a specified deadline, the District would demolish the Old Schoolhouse structure.

The District would implement the proposed project during the fourth quarter of 2019.

Significant Environmental Effects: The project would have significant impacts under the environmental category of historical resources. Under the Sell the Old Schoolhouse Option, impacts to historical resources would be less than significant. Under the Demolish the Old Schoolhouse Option, impacts would be significant and adverse.

The project site is not on a list of hazardous waste sites compiled pursuant to Government Code section 65962.5. The proposed project is not considered a project of statewide, regional, or area-wide significance. A scoping meeting will not be held by the lead agency.

Document Availability: The Draft EIR is available for public review at the following locations:

- Slauson Middle School, Administrative Office, 340 West Fifth Street, Azusa, CA 91702
- AUSD, Main District Administrative Office, 546 South Citrus Avenue, Azusa, CA 91702
- <http://ausd-ca.schoolloop.com/business>

Public Review and Comment: The District will accept written comments on the Draft EIR beginning **June 12, 2019**, and ending **July 29, 2019**. Written comments must be received no later than July 29, 2019, and should be directed to the attention of Marc Bommarito, Assistant Superintendent, Business Services, at the address below:

THIS NOTICE WAS POSTED
ON June 11 2019
UNTIL July 11 2019
REGISTRAR – RECORDER/COUNTY CLERK

Marc Bommarito
Assistant Superintendent, Business Services
Azusa Unified School District
546 South Citrus Avenue
Azusa, CA 91702
mbommarito@azusa.org
626-858-6162

2019 160218
FILED
Jun 11 2019
Dean C. Logan, Registrar – Recorder/County Clerk
Electrically signed by TODD TRAN

“Education – The Torch that Lights the Path of Knowledge”

Attachment to Azusa Historical Society letter, page 2



Azusa Unified School District

546 South Citrus Avenue . P.O. Box 500 . Azusa, CA 91702-0500
Phone (626) 967-6211; FAX (626) 858-6123

Board of Education

| | |
|------------------------|----------------|
| Helen Jaramillo | President |
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| Paul Naccachian | Clerk |
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Proposed Project: The proposed project involves removing the Old Schoolhouse structure, removing chain-link fencing around the structure, capping utility systems connected to the structure, and improving the footprint of the Old Schoolhouse and surrounding area with either landscape or parking.

The District is considering two options to remove the Old Schoolhouse:

- *Sell the Old Schoolhouse.* The District would offer to sell the Old Schoolhouse in its current state to a successful buyer who can preserve the structure in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- *Demolish the Old Schoolhouse.* If a successful buyer is not identified or if the structure is not removed from District property (i.e., project site) by the successful buyer prior a specified deadline, the District would demolish the Old Schoolhouse structure.

The District would implement the proposed project during the fourth quarter of 2019.

Significant Environmental Effects: The project would have significant impacts under the environmental category of historical resources. Under the Sell the Old Schoolhouse Option, impacts to historical resources would be less than significant. Under the Demolish the Old Schoolhouse Option, impacts would be significant and adverse.

The project site is not on a list of hazardous waste sites compiled pursuant to Government Code section 65962.5. The proposed project is not considered a project of statewide, regional, or area-wide significance. A scoping meeting will not be held by the lead agency.

Document Availability: The Draft EIR is available for public review at the following locations:

- Slauson Middle School, Administrative Office, 340 West Fifth Street, Azusa, CA 91702
- AUSD, Main District Administrative Office, 546 South Citrus Avenue, Azusa, CA 91702
- <http://ausd-ca.schoolloop.com/business>

Public Review and Comment: The District will accept written comments on the Draft EIR beginning **June 12, 2019**, and ending **July 29, 2019**. Written comments must be received no later than July 29, 2019, and should be directed to the attention of Marc Bommarito, Assistant Superintendent, Business Services, at the address below:

A1-3
CONT'D

2019 174436

FILED
 Jun 21 2019
 Dean C. Logan, Registrar - Recorder/County Clerk
 Electronically signed by MAXINE CARRASCO

Marc Bommarito
 Assistant Superintendent, Business Services
 Azusa Unified School District
 546 South Citrus Avenue
 Azusa, CA 91702
 mbommarito@azusa.org
 626-858-6162

THIS NOTICE WAS POSTED
 ON June 21 2019
 UNTIL July 22 2019
 REGISTRAR - RECORDER/COUNTY CLERK

"Education - The Torch that Lights the Path of Knowledge"

A1. Response to Comments Azusa Historical Society, Board of Directors, dated July 18, 2019.

A1-1 The commenters state that the Azusa Historical Society Board of Directors are opposed to the demolition of the Old Schoolhouse. The commenters indicate that the Old Schoolhouse is the last remaining schoolhouse circa 1990s and the building is considered valuable from an architectural and historical standpoint.

The District shares the Historical Society's concern over the potential demolition of the Old Schoolhouse. The District has selected the Relocated and Rehabilitation for Reuse Alternative and is working with the City of Azusa to relocate the Old Schoolhouse to Veterans Freedom Park.

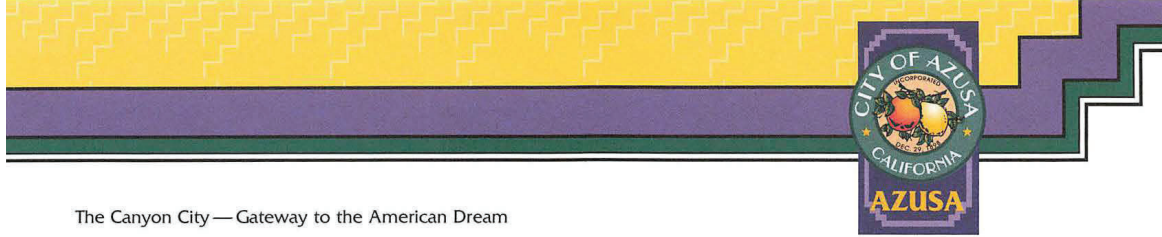
A1-2 The commenters state that the Azusa Historical Society has frequently provided tours of the Museum located at the Durrell House to elementary school children, which include tours of "mock-up" turn-of-the-century classrooms. The commenters opine that there is an opportunity to create a partnership with the District so that students can visit the preserved Old Schoolhouse. The commenters state that due to the Old Schoolhouse's local significance as a cultural and historical landmark, that it also meets the criteria for state designation.

As indicated on page 5.1-10 in Chapter 5.1, *Historical Resources*, of the Draft EIR, the Old Schoolhouse is eligible for listing in the California Register of Historic Resources under Criteria 1 and 3. The proposed project would relocate the Old Schoolhouse to Veterans Freedom Park. As the Draft EIR includes the same conclusion as the commenter, no changes to the analysis are required.

A1-3 The commenters urge the District to consider preservation and restoration of the Old Schoolhouse. The commenters also attached two copies of the Notice of Availability for the Draft EIR (see the Societies attachments of the Notice of Availability, pages 2-4 and 2-5).

The District agrees that relocation and preservation of the Old Schoolhouse is preferable and selected the Relocated and Rehabilitation for Reuse Alternative. The District is working with the City of Azusa to relocate the Old Schoolhouse to Veterans Freedom Park.

LETTER A2 – City of Azusa, Matt Marquez, Economic and Community Development Director (2 pages)



The Canyon City — Gateway to the American Dream

July 29, 2019

Marc Bommarito
Assistant Superintendent Business Services
Azusa Unified School District
546 South Citrus Avenue
Azusa, CA 91702
mbommarito@azusa.org

RE: Comments on Old Schoolhouse Removal Draft Environmental Impact Report

The City of Azusa has reviewed The Old Schoolhouse Removal (“Project”) Draft Environmental Impact Report (“Draft EIR”) and provides the following comments:

- A2-1 | 1. As was the case with the Initial Study and Notice of Preparation for the Project (“IS/NOP”), the Draft EIR does not list the City of Azusa as a responsible agency for the Old Schoolhouse Removal Project. As noted in Draft EIR section 3.4.2, a responsible agency is one that has discretionary power over a project. (Pub. Resources Code, §21069.) The Draft EIR states that the Project would not require approval from any public agencies. This assertion is incorrect. For example, Azusa Municipal Code Section 55-49 provides special review procedures for demolition of a potential landmark such as The Old Schoolhouse. Further, it appears that the City’s zoning and building code apply to the Project. Government Code, section 53094 only allows a school district to render local zoning ordinances inapplicable if the district takes specific action and if the project is for classroom facilities. As documented in the Draft EIR, that is not the case with this Project. Further, even if the District believes that the Project is exempt under Government Code, section 53094, that does not relieve it of the obligation, under Government Code, section 53097, to comply with any City ordinance regulating drainage, road improvements and conditions, or grading plans. Finally, the City also reserves the right to designate the property as a historic landmark and/or to nominate The Old Schoolhouse structure for listing on the California Register of Historic Resources, after which the demolition would require a certificate of appropriateness from the City. The City should have been listed in the Draft EIR as a responsible agency, and the District must comply with all requirements for responsible agencies under CEQA vis-à-vis the City. (Pub. Resources Code, §21153; State CEQA Guidelines, § 15096.)
- A2-2 |
- A2-3 |
- A2-4 | 2. The Project includes a Parking Lot option which, as documented in the Draft EIR, would increase the impermeable surface area on the site by 5,000 square feet. (Draft EIR §3.3.1, p. 3-3.) Neither the IS/NOP section 5 nor the Draft EIR, provide substantial evidence to support an explanation as to how the Parking Lot would comply with the City’s Stormwater and Urban Runoff Pollution Prevention Ordinance in Azusa Municipal Code Chapter 60, or with any other requirements from the state or regional water quality control board under the NPDES program.
- A2-5 | Further, neither the IS/NOP nor the Draft EIR provide substantial evidence as to whether the

Old Schoolhouse Removal DEIR Comment Letter
July 29, 2019
Page 2 of 2

A2-5
CONT'D

Parking Lot will result in an increase stormwater runoff, for which the City has an obligation under its MS4 permit to control and for which mitigation may be required under CEQA. Though this issue was expressly raised in the City's IS/NOP Comment letter, the only information provided in the Draft EIR is the unsupported statement in the Project Description that "landscaping" in the Parking Lot options would "filter stormwater runoff." (Draft EIR §3.3.1, p. 3-3.). This statement does not constitute substantial evidence. (State CEQA Guidelines, §15384.)

A2-6

3. State CEQA Guidelines, section 15126.6(e)(2) states that if, as is the case here, the no-project alternative is the environmentally superior alternative, an EIR must also identify "an environmentally superior alternative" from among the other alternatives. But section 7.5 of the Draft EIR fails to identify an environmentally superior alternative, stating instead that all three of the alternatives identified in the Draft EIR are "environmentally superior." By failing to identify an environmental superior alternative the District may not avoid having to make specific findings, supported by substantial evidence, as to the feasibility of the "environmentally superior alternative." (Pub. Resources Code, §§21081(a)(3), 21081.5; State CEQA Guidelines, §15091(a)(3).) Based on review of Chapter 7 of the Draft EIR, the environmentally superior alternative appears to be the "Relocate to Another District Property and Rehabilitate for Reuse" alternative, which is environmentally superior to the Project and feasible, as the Draft EIR states that it meets all but 2 of the Project objectives. (*See Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477 [alternatives must be able to implement most project objectives, but they need not be able to implement all of them].)

A2-7

As a Responsible Agency for this Project, if the City concludes that the Final EIR is inadequate for its purposes, under State CEQA Guidelines, section 15050 and 15096, the City must either challenge the adequacy of the EIR in court, assume the lead agency status, or require preparation of a subsequent EIR. Accordingly, we appreciate your consideration of the City's comments on the Draft EIR, and look forward to the City's preparation of a Final EIR, or of a recirculated Draft EIR, that ensures the environmental review of the Project is adequate for the City's purposes, and adequately ascertains, discloses, and feasibly mitigates all potential environmental impacts of the Project.

A2-8

As our agencies have discussed for decades, The Old Schoolhouse has a rich history in the City of Azusa and its potential demolition is of significant concern to the City. Once the School District has fully complied with CEQA, the City would encourage the District to only move forward with the Project if it the "environmentally superior alternative" is chosen. The "environmentally superior alternative" is to "Relocate to Another District Property and Rehabilitate for Reuse".

Sincerely,



Matt Marquez

Economic and Community Development Director

A2. Response to Comments from City of Azusa, Matt Marquez, Economic and Community Development Director, dated July 29, 2019.

A2-1 The commenter indicates that the Initial Study and Notice of Preparation (IS/NOP) and the Draft EIR do not list the City of Azusa as a responsible agency for the proposed project.

While the District disagrees with the City concerning its designation as a responsible agency under CEQA, the District has selected the Relocated and Rehabilitation for Reuse Alternative and is working with the City of Azusa to relocate the Old Schoolhouse to Veterans Freedom Park. The District shares the City's concern over the Old Schoolhouse and looks forward to its successful relocation.

A2-2 The commenter opines that the Draft EIR's assertion, that the proposed project would not require approval from any public agencies, is incorrect. The commenter states that City of Azusa Municipal Code Section 55-49 would apply to the proposed project, and that Government Code Sections 53094 and 53097 are applicable to the proposed project.

The District is not subject to the City of Azusa's Municipal Code Section 55-49 and its procedures for demolition of a potential landmark. While disagreeing with the City's comment, the District has selected the Relocated and Rehabilitation for Reuse Alternative and is working with the City of Azusa to relocate the Old Schoolhouse to Veterans Freedom Park.

The District has decided to move forward only with the removal of the Old Schoolhouse and will not proceed with development of a parking lot. This eliminates the issues raised about Government Code sections 53094 and 53097.

A2-3 The commenter states that the City reserves the right to designate the property as a historic landmark and/or to nominate the Old Schoolhouse structure for listing on the California Register of Historic Resources, after which the demolition would require a certificate of appropriateness from the City. The commenter reiterates that the City should have been listed as a responsible agency and that the District must comply with all requirements for responsible agencies under CEQA vis-a-vis the City.

The District is not subject to the City of Azusa's Municipal Code Section 55-49 and its procedures for demolition of a potential landmark. However, the District is working with the City to relocate the Old Schoolhouse to Veterans Freedom Park. The City will be free to nominate the building for listing on the California Register of Historic Resources.

A2-4 The commenter indicates that the neither the Draft EIR nor the IS/NOP provided substantial evidence to support an explanation as to how the parking lot would comply with the City’s Stormwater and Urban Runoff Pollution Prevention Ordinance, Azusa Municipal Code Section 60, or with state or regional water quality control board requirements under the NPDES program.

The District has decided to move forward only with the removal of the Old Schoolhouse and will not proceed with development of a parking lot. This eliminates the issues raised about Government Code sections 53094 and 53097.

A2-5 The commenter states that neither the IS/NOP nor the Draft EIR provide substantial evidence as to whether the parking lot would result in an increase in stormwater runoff, for which the City has an obligation under its MS4 permit to control and for which mitigation may be required under CEQA. The commenter indicates that this issue was raised in the City’s IS/NOP comment letter, however, Section 3.31 on page 3-3 of the Draft EIR, states that the parking lot option would “filter stormwater runoff,” and that this statement does not constitute substantial evidence.

The District has decided to move forward only with the removal of the Old Schoolhouse and will not proceed with development of a parking lot. This eliminates the issues raised about Government Code sections 53094 and 53097.

A2-6 The commenter states that according to CEQA Guidelines, Section 15126.6(e)(2), if the no-project alternative is the environmentally superior alternative, as is the case in the Draft EIR, then the EIR must also identify “an environmentally superior alternative” from among the other alternatives. The commenter states that the “Relocate to Another District Property and Rehabilitate for Reuse” is the environmentally superior alternative as it meets all but two of the project objectives.

Table 7-1 on page 7-13 of the Draft EIR identifies three alternatives that would be environmentally superior to the proposed project. Relocation to Another District Property and Rehabilitate for Reuse is shown as environmentally superior to the proposed project. This alternative is discussed beginning on page 7-11 of the Draft EIR. The District has chosen to implement the relocation alternative and looks forward to the successful transfer of the Old Schoolhouse to Veterans Freedom Park.

A2-7 The commenter opines that, as a responsible agency for the proposed project, if the City concludes that the Final EIR is inadequate under State CEQA Guidelines Section 15050 and 15096, the City must either challenge the adequacy of the EIR in court, assume the lead agency status, or require preparation of a subsequent EIR. The City looks forward to the preparation of the Final EIR or recirculated Draft EIR that ensures the environmental review of the proposed project is adequate for the City’s

purposes, and adequately ascertains, discloses, and feasibly mitigates all potential environmental impacts of the proposed project.

The District has chosen to implement the relocation alternative and is working with the City to relocate the Old Schoolhouse to Veterans Freedom Park. With relocation of this building, the project would have no significant impacts. Recirculation of the Draft EIR is unnecessary.

A2-8 The commenter states that the Old Schoolhouse has a rich history in the City and its potential demolition is of significant concern to the City. The commenter states that, once the District has fully complied with CEQA, the City would encourage the District to only move forward if the environmentally superior alternative, which is the “Relocate to another District Property and Rehabilitate for Reuse,” is chosen.

The District is pleased to work with the City on the relocation of the Old Schoolhouse to Veterans Freedom Park. No further response is necessary.

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LETTER A3 – Governor’s Office of Planning and Research, State Clearinghouse, Scott Morgan, Director (1 page)



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor’s Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

July 29, 2019

Marc Bommarito
Azusa Unified School District
546 South Citrus Avenue
2018041074
Azusa, CA 91702

Subject: Old Schoolhouse Removal
SCH#: 2018041074

Dear Marc Bommarito

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 7/26/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, <https://ceqanet.opr.ca.gov/2018041074/2>.

A3-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
AUG - 2 2019
AZUSA UNIFIED SCHOOL DISTRICT
BUSINESS SERVICES

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

A3. Response to Comments from Governor’s Office of Planning and Research, State Clearinghouse, Scott Morgan, Director, dated July 29, 2019.

A3-1 The commenter indicates that the State Clearinghouse submitted the EIR to selected state agencies for review and received no comments from state agencies during the review period. The commenter states that the Project complied with the State Clearinghouse review requirements for draft environmental documents.

The comment does not address the adequacy of the Draft EIR as it pertains to CEQA; therefore, no further response is necessary.

**CEQA FINDINGS OF FACT
REGARDING THE
FINAL ENVIRONMENTAL IMPACT REPORT
FOR THE
REMOVAL OF OLD SCHOOLHOUSE
STATE CLEARINGHOUSE NO. 2018041074**

Exhibit A

I. BACKGROUND

The California Environmental Quality Act (CEQA) requires that a number of written findings be made by the lead agency in connection with certification of an environmental impact report (EIR) prior to approval of the project pursuant to Sections 15091 and 15093 of the CEQA Guidelines and Section 21081 of the Public Resources Code. This document provides the findings required by CEQA.

A. PROJECT SUMMARY

Project Location

The project site is on the southeast corner of Slauson Middle School at 340 West 5th Street in the City of Azusa, northeast Los Angeles County, California. The project site has a separate address—403 North Angeleno Avenue—and is the northwest corner of the intersection of West 4th Street and North Angeleno Avenue. The cities surrounding Azusa include Duarte and Bradbury to the west, Glendora to the east, and Irwindale and Covina to the south. The San Gabriel Mountains and San Gabriel River are north of the project site. Interstate 210 (I-210) is 0.35 mile southwest of the site, and the Metrolink Gold Line Light Rail is 0.4 mile north of the project site.

Project Description

The proposed project involves relocating the Old Schoolhouse structure, removing the chain-link fencing around the structure, capping utility systems connected to the structure, and improving the footprint of the Old Schoolhouse and surrounding area with either landscape or parking. The proposed Project would relocate the Old Schoolhouse to Veterans Freedom Park, located at 213 East Foothill Boulevard, in the City of Azusa.

The District has decided to move forward only with the removal of the Old Schoolhouse and will not proceed with development of a parking lot.

B. ENVIRONMENTAL REVIEW PROCESS

In conformance with CEQA, the State CEQA Guidelines, and the AUSD CEQA Guidelines, the AUSD conducted an extensive environmental review of the proposed project.

- The AUSD determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP) and Initial Study on April 30, 2018. The public review period extended from April 30, 2018, to May 29, 2018.
- Based upon the Initial Study and Environmental Checklist Form, the AUSD staff determined that a Draft EIR (DEIR) should be prepared for the proposed project. The scope of the DEIR was

determined based on AUSD's Initial Study, comments received in response to the NOP, and comments received at the scoping meeting conducted by the District. Table 2-1, *NOP Response Letters*, of Section 2.2 of the DEIR describes the issues identified for analysis in the DEIR.

- The District prepared a DEIR, which was made available for a 45-day public review period beginning June 12, 2019, and ending July 26, 2019.
- The District prepared a Final EIR (FEIR), including the Responses to Comments to the DEIR, the Findings of Fact, and the Statement of Overriding Considerations. The FEIR/Response to Comments contains comments on the DEIR, responses to those comments, revisions to the DEIR, and appended documents.

C. RECORD OF PROCEEDINGS

For purposes of CEQA and these Findings, the Record of Proceedings for the proposed project consists of the following documents and other evidence, at a minimum:

- The NOP and all other public notices issued by the District in conjunction with the proposed project
- The FEIR for the proposed project
- The DEIR
- All written comments submitted by agencies or members of the public during the public review comment period on the DEIR
- All responses to written comments submitted by agencies or members of the public during the public review comment period on the DEIR
- The Mitigation Monitoring and Reporting Program
- The reports and technical memoranda included or referenced in the Response to Comments
- All documents, studies, EIRs, or other materials incorporated by reference in the DEIR and FEIR
- The Resolutions adopted by the AUSD Board of Education in connection with the proposed project, and all documents incorporated by reference therein, including comments received after the close of the comment period and responses thereto
- Matters of common knowledge to the District, including but not limited to federal, state, and local laws and regulations
- Any documents expressly cited in these Findings
- Any other relevant materials required to be in the record of proceedings by Public Resources Code Section 21167.6(e)

D. CUSTODIAN AND LOCATION OF RECORDS

The documents and other materials that constitute the administrative record for the District's actions related to the project are at the AUSD, 546 South Citrus Avenue, Azusa CA 91702. The District is the custodian of the administrative record for the project. Copies of these documents, which constitute the record of proceedings, are and at all relevant times have been and will be available upon request at the offices of the District. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2) and Guidelines Section 15091(e).

II. FINDINGS AND FACTS AND OVERRIDING CONSIDERATIONS

The AUSD, as lead agency, is required under CEQA to make written findings concerning each alternative and each significant environmental impact identified in the DEIR and FEIR.

Specifically, regarding findings, Guidelines Section 15091 provides:

- (a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:
 - 1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the FEIR.
 - 2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
 - 3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the FEIR.
- (b) The findings required by subsection (a) shall be supported by substantial evidence in the record.
- (c) The finding in subdivision (a)(2) shall not be made if the agency making the finding has concurrent jurisdiction with another agency to deal with identified feasible mitigation measures or alternatives. The finding in subsection (a)(3) shall describe the specific reasons for rejecting identified mitigation measures and project alternatives.
- (d) When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or

substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures.

- (e) The public agency shall specify the location and custodian of the documents or other material which constitute the record of the proceedings upon which its decision is based.
- (f) A statement made pursuant to Section 15093 does not substitute for the findings required by this section.

The “changes or alterations” referred to in Section 15091(a)(1) may include a wide variety of measures or actions as set forth in Guidelines Section 15370, including:

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

III. FINDINGS AND FACTS REGARDING IMPACTS

A. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

Initial Study

An Initial Study was prepared by the District to identify the potential significant effects of the project. The Initial Study was completed and distributed with the Notice of Preparation for the proposed project, dated April 20, 2018, and is included in the Draft EIR as Appendix A. The Initial Study determined that the proposed project would not have the potential to result in significant impacts to the following resources:

- Aesthetics
- Agricultural Resources
- Air Quality,
- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Cultural Resources in the Environmental Checklist was determined to require further assessment in an EIR. The Initial Study stated that impacts to Tribal Cultural Resources were determined to be below established thresholds of significance. However, based on a comment letter from the Gabrieleño Band of Mission Indians-Kizh Nation requesting tribal monitoring, Tribal Cultural Resources was included in the EIR.

Final EIR

This section identifies impacts of the proposed project determined to be less than significant without implementation of project-specific mitigation measures. This determination, however, does assume compliance with Existing Regulations as detailed in Chapter 5 of the FEIR.

Tribal Cultural Resources

Impact 5.2-1: The proposed removal of the Old Schoolhouse would not cause a substantial adverse change in significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, pursuant to criteria in Public Resources Code Section 5024.1(c), or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).

The Old Schoolhouse structure is listed in the City of Azusa's Survey List of Historic Properties, but it is not on the City's official Historic Landmark List. Nevertheless, in accordance with PRC Section 5024.1(c), the Old Schoolhouse is eligible for listing on the California Register under Criteria 1 and 3 (see Impact 5.1-1). Its eligibility is based on the building's association with the early education of children in the City of Azusa and the structure being the oldest and last remaining one-room schoolhouse in Azusa and the San Gabriel Valley. The Old Schoolhouse eligibility for listing is not for association with a Native American tribe or as a potential tribal cultural resource. Although the building is eligible for listing in the California Register, pursuant to criteria in PRC Section 5024.1(c), its proposed relocation would not adversely affect the significance of a tribal cultural resource.

Cumulative Impact

As with the proposed project, each related cumulative project would be required to comply with AB 52 and PRC Section 21083.2(i), which addresses accidental discoveries of archaeological sites and resources, including tribal cultural resources. Therefore, any discoveries of TCRs caused by the project or related projects would be mitigated to a less than significant level, and therefore project impacts would not be cumulatively considerable.

Finding

The Azusa Unified School District Board of Education finds, based upon the Draft EIR and Final EIR and the whole record, that the proposed project will result in less than significant impacts and less than cumulatively considerable impacts associated with the project site being eligible for listing in the California Register of Historical Resources or in a local register of historical resources.

B. IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

This section identifies impacts of the proposed project determined to be less than significant with the incorporation of mitigation measures.

Cultural and Historic Resources

Historical Resources

Impact 5.1-1: Removal of the Old Schoolhouse—via relocation and rehabilitation in conformance with the Secretary’s Standards or its demolition—would cause a potentially significant adverse change to the building’s historical significance.

The Old Schoolhouse and former Riley School property are not listed in the National Register of Historic Places or California Register of Historic Resources (CRHR). However, the Old Schoolhouse is eligible for listing in the CRHR as a historical resource under Criteria 1 and 3.

- **Criterion 1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.**

The Old Schoolhouse has made a significant contribution to the early history of education of children and appears to be the oldest and last remaining one-room schoolhouse in Azusa and the San Gabriel Valley. It is associated with an important time of local history, as it housed segregated Mexican and Latino children before the District was required by a federal court ruling to integrate them with the rest of the school population in 1947. Additionally, the District acknowledges the historical connection of the Old Schoolhouse building to the community in Resolution #05-06:30. Therefore, the Old Schoolhouse is eligible for listing in the California Register under Criterion 1.

- **Criterion 3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.**

Though the Old Schoolhouse may have been constructed as early as 1903, it is eligible for listing under Criterion 3 as an example of a one-room schoolhouse dating from 1929. The Old Schoolhouse building has retained important levels of integrity of materials, workmanship, design, feeling, and association. While the building has not retained its original integrity of setting and location, its current setting and location on a property that functions as an educational facility has created for the building a relationship with its historic location. The building’s design (massing and fenestration) clearly demonstrates its original use as a one-room

schoolhouse—a rare example in Los Angeles County. The exterior of the building has retained a substantial amount of its historic architectural integrity from the 1929 remodel using the Craftsman style of architecture. The interior of the building has also retained a substantial level of physical integrity. Overall, the building successfully conveys its ability to present its historic significance of early education in Azusa.

According to the CEQA Guidelines, a project would result in a significant impact to historical resources if it would materially impair a historical resource (CEQA Guidelines Section 15064.5[b][1]). Impairment occurs if the historical resource is demolished or materially altered in an adverse manner its physical characteristics of features that convey the historical significance and justify its inclusion in or eligibility for inclusion in the CRHR (CEQA Guidelines Section 15064.5[b][2]). The CEQA Guidelines also specify a means of evaluating the relative significance of project impacts on historical resources. CEQA Guidelines Section 15064.5(b)(3) states:

Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than significance on the historical resource.

Compliance with the Secretary’s Standards indicates that a project may have a less than significance impact on a historical resource. The converse of this does not hold; that is, failure to comply with the Secretary’s Standards does not, by definition, result in a significant impact under CEQA. CEQA recognizes that alterations that are not consistent with the Secretary’s Standards may still not result in significant impacts to the historical resource. Therefore, the significance of project impacts on a historical resource can be evaluated by determining:

- Whether a project is in conformance with the Secretary’s Standards (less than significant impact).
- Whether a project is in substantial conformance with the Secretary’s Standards and does not result in material impairment (less than significant impact, with mitigation if required).
- Whether a project is not in conformance with the Secretary’s Standards and results in material impairment (significant impact).

Project implementation would result in the relocation of the Old Schoolhouse to Veterans Freedom Park, consistent with the Secretary of Interior’s Standards for the Treatment of Historic Properties.

Relocation of the Old Schoolhouse. The Old Schoolhouse, which was relocated from its original location at the Old Riley School located at Soldano Avenue and 4th Street, to its existing location on Slauson Middle School, would be relocated to Veterans Freedom Park, at 213 E Foothill Boulevard, which is approximately 0.7 miles northeast of the project site. As stated in Section 7.2 of the DEIR, a less than significant finding on proposed alterations to historical resources can be made only if the alterations are consistent with the Secretary’s Standards for Treatment of Historic Properties. On this

basis, the impact of relocating the Old Schoolhouse to another site, if executed in accordance with Secretary Standards, would be less than significant.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

CUL-1 Prior to the removal of the Old Schoolhouse building—via relocation in conformance with the Secretary’s Standards or demolition—the District shall retain qualified individuals to document the facility using the Historic American Building Survey (HABS) Level III standards as a guideline for recording the building through a compilation of photographs, drawings, and written description to record the historic resource:

- **Written Data:** The history of the property and description of the historic resource shall be prepared. The Historic Resource Assessment Report of the Old Schoolhouse (see Appendix F of the DEIR) may be used.
- **Drawings:** A sketch plan of the interior floorplan of the building shall be prepared.
- **Photographs:** Large-format photographs and negatives shall be produced to capture interior and exterior views of the Old Schoolhouse structure. At least two large format pictures shall be taken to show the building’s setting in context and in relationship to its location. The photographs and negatives must be created using archival stable paper and processing procedures.
- **Document.** The HABS Level III document must be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. A digital version of the HABS document shall be prepared with the hard copy. The final HABS Level III document shall be donated to the Azusa Historical Society and/other responsible repository within the San Gabriel Valley.

Cumulative Impact

The proposed project would have a cumulatively considerable effect on historical resources if the project and related projects were historically significant under the same criteria and conditions, and their alterations were inconsistent with the Secretary’s Standards. The potential for cumulative impacts to cultural resources from other projects is unknown. Destruction of significant cultural resources from each of these projects would constitute a significant cumulative impact.

However, similar to the proposed project, all projects would require mitigation of impacts, including archiving and recovery of any found resources prior to development of the site. The proposed project has incorporated mitigation measures that would reduce the potential contribution to cumulative impacts, under the option to sell the Old Schoolhouse. Therefore, the project would not result in significant to cultural resources, under the option to relocate the Old Schoolhouse. In consideration of the preceding factors, the project’s contribution to cumulative cultural resource impacts would be rendered less than significant, and therefore, project impacts would not be cumulatively considerable.

Finding

The Azusa Unified School District Board of Education finds that implementation of Mitigation Measure CUL-1 is feasible in reducing impacts to cultural resources under the option to relocate the Old Schoolhouse and is therefore adopted (Public Resources Code § 201081[a][1], Guidelines § 15091[a][1]). Therefore, the Azusa Unified School District Board of Education hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR and Final EIR.

Tribal Cultural Resources

Impact 5.2-2: Soil-disturbing activities for the proposed project may encounter undiscovered tribal cultural resources.

The project site has been identified by the Gabrieleño Band of Mission Indians-Kizh Nation as being within their geographic area and as potentially culturally sensitive to the Gabrieleño people. In a letter dated May 8, 2018, the Gabrieleño Band of Mission Indians-Kizh Nation requested tribal member monitoring during all ground-disturbing activities at the project site.

The Old Schoolhouse structure is supported by wood post footings, and the relocation of the structure and footings would require minimal soil disturbance. Capping utilities on the site would disturb soil, but likely no more than 24 inches deep. (Development of a parking lot at this location has been eliminated from the project, so any soil disturbance associated with that component of the project would not occur). The project site was previously graded during construction of Slauson Middle School, and project implementation would not require deep excavations. Consequently, it is unlikely that implementation of the proposed improvements would result in discovery of subsurface resources. However, as discussed in Sections 5.5(b) and 5.17(b) of the Initial Study (see Appendix A of the DEIR), if subsurface resources are uncovered, the District will comply with CEQA Guidelines Section 15064.5, which provides that work in the area of a discovery shall be suspended until a qualified archaeologist can assess the significance of the find, and if necessary, develop appropriate avoidance and/or recovery. Considering the Kizh Nation's request for a tribal monitor and the fact that a prehistoric village has been discovered approximately 1.5 miles northeast of the site, the District concurs that any accidental discovery of tribal resources would be potentially significant.

Mitigation Measures:

The following mitigation measures were included in the DEIR and the FEIR and are applicable to the proposed project. The measures as provided include any revisions incorporated in the FEIR.

TCR-1 In the event of an accidental discovery of subsurface items during soil disturbance construction activities, the District shall immediately retain a qualified registered professional archaeologist (RPA) to evaluate the potential resource and make a finding significance under Section 15064.5 of the California Environmental Quality Act Guidelines. If the RPA determines that the potential resource is of tribal cultural significance, the RPA shall contact liaisons for local Native American tribes, including but not limited to the Gabrieleño Band of Mission Indians Kizh Nation and their Native Monitor. The RPA and Native Monitor shall assess the find and, as

appropriate, develop a plan for recovery, analysis, report, and/or curation of the item to the appropriate entity or Native American tribe. The find shall be reported to an accredited and permanent scientific institution, such as the South Central Coastal Information Center.

Cumulative Impact

Each related cumulative project would be required to comply with CEQA Guidelines Section 15064.5, which addresses accidental discoveries of archaeological sites and resources, including tribal cultural resources. Therefore, any discoveries of tribal cultural resources caused by the project or related projects would be mitigated to a less than significant levels. Project impacts would not be cumulatively considerable.

Finding

The Azusa Unified School District Board of Education finds that implementation of Mitigation Measure TCR-1 is feasible in reducing impacts to tribal cultural resources and is therefore adopted (Public Resources Code § 201081[a][1], Guidelines § 15091[a][1]). Therefore, the Azusa Unified School District Board of Education hereby finds that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR and Final EIR.

C. SIGNIFICANT UNAVOIDABLE SIGNIFICANT ADVERSE IMPACTS

The proposed project would not result in unavoidable adverse impacts where either mitigation measures were found to be infeasible, or mitigation would not lessen impacts to less than significant.

IV. ALTERNATIVES TO THE PROPOSED PROJECT

A. Alternatives Selected for Further Analysis

The following alternatives were determined to represent a reasonable range of alternatives with the potential to feasibly attain most of the basic objectives of the project but avoid or substantially lessen any of the significant effects of the project.

No Project Alternative

Under this alternative, no changes to the project site would occur. The Old Schoolhouse would remain in its current condition and the surrounding fence would not be removed, and the District would not install landscaping or a new parking lot on the project site. The District would continue to replace/reinstall tarp over the structure's roof to minimize damage from inclement weather. Due to the unstable nature of the Old schoolhouse, the cost to purchase and install the tarp is approximately \$3,000. The District has not allocated other funds to maintain the Old Schoolhouse. Similar to existing conditions, under this alternative, the structure would continue to fall into disrepair. Neither the District, City, nor community have made efforts to improve the Old Schoolhouse over the last decade.

Conclusion

The No Project Alternative is neither environmentally superior nor inferior to the proposed project in terms of historical resources. This alternative would retain the Old Schoolhouse in place, but the building would continue to deteriorate in place. The No Project Alternative would not meet any of the project objectives:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
9. Consider the feasibility for preservation or adaptive reuse of the Old Schoolhouse.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

Finding

The Azusa Unified School District Board of Education finds the No Project Alternative as less desirable than the proposed project because legal, economic, and social considerations make this alternative infeasible (Public Resources Code § 21081[a][3], Guidelines § 15091[a][3]).

Mothball the Old Schoolhouse In-Situ Alternative

This alternative would allow the Old Schoolhouse building to remain in its current location but would be “mothballed” in accordance with the National Park Service’s Technical Preservation Brief #31, “Mothballing Historic Buildings,” included as Appendix I to the DEIR. Mothballing the Old Schoolhouse building would prevent it from further deterioration until additional funding became available for a feasible alternative, such as the “rehabilitate and reuse” alternative. Mothballing can protect a building for up to 10 years; long-term success would depend on continued monitoring and maintenance.

This alternative would close the Old Schoolhouse building temporarily to protect it from weather and secure it from vandalism. Physical repairs would be made prior to securing the building. Mothballing would ensure that the roofs are watertight, that the drainage of the building would not result in damage,

that pests and nests have been removed from the building, that the electrical wiring of the building is safe, that the building is secure, and that the building is well ventilated. Under this alternative, the following steps would be implemented to mothball the Old Schoolhouse building:

- Documentation
- Stabilization
- Mothballing

Preparing the building for mothballing should be undertaken with the assistance of a qualified historic architect or architectural historian with training in methods of historic building conservation. The cost to mothball the facility is roughly 10 percent of the rehabilitation budget, or approximately \$37,804. With the cost to prepare a condition assessment of the Old Schoolhouse, the total cost of the Mothballing Alternative would be \$47,804. Mothballing would take approximately one to two months. The mothballing alternative would delay the proposed landscaping and/or parking lot improvements at the campus until a final decision is made about the Old Schoolhouse.

Conclusion

The mothballing alternative is environmentally superior to the proposed project in terms of historical resources. Although the Old Schoolhouse building would be stabilized and improved for mothballing, the structure would not be improved to Field Act standards, and the fence surrounding the building would remain for public safety purposes and to discourage trespassing. Therefore, this alternative would not significantly enhance the aesthetics of Slauson Middle School or the surrounding residential community. This alternative would not meet nine of the 10 project objectives:

1. Ensure public welfare and safety of Slauson Middle School occupants and surrounding community.
2. Reduce District liability associated with the Old Schoolhouse, a non-Field Act compliant structure.
3. Reduce District exposure by eliminating safety hazards and hazardous materials.
4. Ensure wise and efficient use of public resources.
5. Improve aesthetics of Slauson Middle School and surrounding community.
6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.
8. Maximize useable space at Slauson Middle School.
10. Develop mitigation to reduce or eliminate, if possible, significant effects, if preservation and/or adaptive reuse is determined infeasible.

Finding

The Azusa Unified School District Board of Education finds the Mothball the Old Schoolhouse In-Situ Alternative as less desirable than the proposed project because economic and social considerations make this alternative infeasible (Public Resources Code § 21081[a][3], Guidelines § 15091[a][3]).

Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ Alternative

Under this rehabilitation alternative, the Old Schoolhouse structure would not be demolished, and the footprint of the structure would not be improved with landscaping for extension of the Slauson Middle School lawn or with a new parking lot. The Old Schoolhouse would be stabilized in its current location for low-impact reuse, including but not limited to office space, part-time museum, and/or educational facility for Slauson Middle School. This alternative would be implemented in accordance with Secretary Standards for the treatment of historic properties, as well as applicable California Historical Building Code requirements, and Division of the State Architect requirements for structural safety and Field Act compliance. Under this alternative, the existing fencing surrounding the building would be removed, and students and staff of District would be able to occupy the Old Schoolhouse building. This alternative would include improvements to the Old Schoolhouse, specified in a Preliminary Report of Current Conditions of the Old Schoolhouse prepared in August 2015 (see Appendix J of the DEIR).

Should this alternative be implemented, a Historic Structures Report (HSR) would be required to document current conditions, as they may have changed from 2015, and confirm that the improvements proposed under this alternative are fully consistent with the Secretary's Standards and Guidelines. The cost to prepare the HSR would be about \$11,800.¹ According to the 2015 Preliminary Report of Current Conditions, the cost to implement the above improvements was \$455,497. Assuming conditions have not changed substantially, and no additional improvements are required, the total cost to implement this Alternative would be \$467,297. This alternative would take approximately two months to complete and could be done over a summer break.

Conclusion

This adaptive reuse alternative is environmentally superior to the proposed project in terms of historical resources. However, this alternative would not meet two of the 10 project objectives:

6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.

Finding

The Azusa Unified School District Board of Education finds the Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ more desirable than the proposed project because it would preserve the historic and structural integrity of the Old Schoolhouse. However, economic considerations make this alternative infeasible (Public Resources Code § 21081[a][3], Guidelines § 15091[a][3]).

¹ All cost figures have been adjusted from the original 2015 study using Bureau of Labor Statistics factors for December 2021.

Relocate and Rehabilitate for Reuse Alternative

CEQA requires analysis of alternative project locations. The key question and first step in such an analysis is to determine whether the significant effects of the project would be avoided or substantially lessened by implementing the project at another site (CEQA Guidelines 15126.6[f][2]). For the proposed project, the question would be whether relocating the Old Schoolhouse building to a different site would reduce the project's significant and adverse impact on historical resources. The Old Schoolhouse, which was relocated from its original location to its existing location on Slauson Middle School, would be relocated to Veterans Freedom Park, at 213 E Foothill Boulevard, which is approximately 0.7 miles northeast of the project site.

A less than significant finding on proposed alterations to historical resources can be made only if the alterations are consistent with the Secretary's Standards for Treatment of Historic Properties. On this basis, the impact of relocating the Old Schoolhouse to another site, if executed in accordance with Secretary Standards, would be less than significant.

However, relocation alone would not reduce the significant impact to a level below significance. If the Old Schoolhouse collapsed or was irreparably damaged during the relocation process, the impact would be considered significant and unavoidable. Also, if the Old Schoolhouse was left as-is after relocation, impacts to the historical resource would remain significant and adverse. To eliminate the significant impact, the Old Schoolhouse would also need to be maintained after its relocation and/or improved under the Secretary Standards. Rehabilitation of the structure is discussed under the Rehabilitate for Adaptive Reuse of the Old Schoolhouse In-Situ Alternative, above.

The cost to relocate the Old Schoolhouse structure is estimated to be in excess of \$60,000, based on the distance to the receiving site and potential site improvements for its placement. The cost to rehabilitate the structure for potential reuse is \$437,797.² Therefore, the cost to relocate and rehabilitate the Old Schoolhouse for reuse could be up to \$497,797 (\$60,000 + \$437,797).

Conclusion

Even with the potential for a significant and adverse impact associated with movement of the building, this alternative is environmentally superior to the proposed project in the area of historical resources. This alternative would meet all but the following two of the 10 project objectives:

6. Ensure prudent and responsible spending of limited District funds.
7. Minimize or eliminate, if possible, costs associated with the Old Schoolhouse.

Finding

The Azusa Unified School District Board of Education finds the Relocate and Rehabilitate for Reuse Alternative as less desirable than the proposed project because economic considerations make this alternative infeasible (Public Resources Code § 21081[a][3], Guidelines § 15091[a][3]).

² All cost figures have been adjusted from the original 2015 study using Bureau of Labor Statistics factors for December 2021. See Appendix J of the DEIR for the Preliminary Report of Current Conditions of the Old Schoolhouse.

V. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance the benefits of the proposed project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered “acceptable” (State CEQA Guidelines Section 15093[a]). CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate to a level below significance. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 [b]). The agency’s statement is referred to as a “Statement of Overriding Considerations.”

The Azusa Unified School District Board of Education found that changes were incorporated into the project, including adoption of the Relocate and Rehabilitate for Reuse Alternative, working with the City of Azusa to relocate the Old Schoolhouse to Veterans Freedom Park and incorporating Mitigation Measures CUL-1 and TCR-1.

As a result, there are no significant and unavoidable impacts and therefore, adoption of a Statement of Overriding Considerations is unnecessary.

February 2022 | Mitigation Monitoring and Reporting Program
State Clearinghouse No. 2018041074

OLD SCHOOLHOUSE REMOVAL

Azusa Unified School District

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Table of Contents

| Section | Page |
|---|-------------|
| 1. INTRODUCTION..... | 1 |
| 1.1 PURPOSE OF MITIGATION MONITORING PROGRAM..... | 1 |
| 1.2 EIR SUMMARY..... | 1 |
| 1.3 PROJECT LOCATION..... | 2 |
| 1.4 ENVIRONMENTAL IMPACTS..... | 2 |
| 2. MITIGATION MONITORING PROCESS..... | 3 |
| 2.1 MITIGATION MONITORING PROGRAM ORGANIZATION..... | 3 |
| 3. MITIGATION MONITORING REQUIREMENTS..... | 4 |
| 3.1 PRE-MITIGATION MEETING..... | 4 |
| 3.2 CATEGORIZED MITIGATION MEASURES/MATRIX..... | 4 |
| 3.3 IN-FIELD MONITORING..... | 4 |
| 3.4 COORDINATION WITH CONTRACTORS..... | 4 |
| 3.5 COMMUNITY INVOLVEMENT..... | 4 |

Table of Contents

List of Tables

| Table | Page |
|---|-------------|
| Table 3-1 Mitigation Monitoring Requirements | 5 |

1. Introduction

1.1 PURPOSE OF MITIGATION MONITORING PROGRAM

The Azusa Unified School District (District) is the lead agency for the proposed Removal of Old Schoolhouse project and has developed this Mitigation Monitoring and Reporting Program (MMRP) to provide a vehicle by which to monitor mitigation measures and conditions of approval outlined in the Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2018041074. The Mitigation Monitoring Program has been prepared in conformance with Section 21081.6 of the Public Resources Code and Insert City Monitoring Requirements. Section 21081.6 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.
 - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

The MMRP consists of mitigation measures that avoid, reduce, and/or fully mitigate potential environmental impacts. The mitigation measures have been identified and recommended through preparation of the Environmental Impact Report and drafted to meet the requirements of Public Resources Code Section 21081.6.

1.2 EIR SUMMARY

The EIR identified one significant and unavoidable adverse impact, as defined by CEQA, which would result from implementation of the proposed relocation of the Old Schoolhouse. The proposed project would significantly impact Historic Resources in Chapter 5.1 of the DEIR.

1. Introduction

1.3 PROJECT LOCATION

The proposed project site is located on the southeast corner of Slauson Middle School campus at 403 North Angeleno Avenue in the City of Azusa, Los Angeles County. The site is located at the northwest corner of the intersection of West 4th Street and North Angeleno Avenue, north of Memorial Park. The project site is about 0.5 miles northeast of the Interstate 210 Freeway (210).

1.4 ENVIRONMENTAL IMPACTS

1.4.1 Impacts Considered Less Than Significant

The Initial Study and supporting EIR identified various thresholds from the CEQA Guidelines among a number of environmental categories that would not be significantly impacted by the proposed project and therefore did not require mitigation. Impacts to the following environmental resources were found to be less than significant.

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

The Initial Study stated that impacts to Tribal Cultural Resources were determined to be below established thresholds of significance. However, based on a comment letter from the Gabrieleño Band of Mission Indians-Kizh Nation requesting tribal monitoring, Tribal Cultural Resources was included in the EIR, and a mitigation measure TCR-1 is included.

1.4.2 Unavoidable Significant Adverse Impacts

The proposed project would not result in any unavoidable significant adverse impacts.

2. Mitigation Monitoring Process

2.1 MITIGATION MONITORING PROGRAM ORGANIZATION

Overall MMRP management is the responsibility of the District. The District's technical consultants (CEQA consultant, biologist, archaeologist, paleontologist, etc.) may perform related monitoring tasks under the direction of the environmental monitor (if they are contracted by the District).

2.1.1 AZUSA UNIFIED SCHOOL DISTRICT

The District is the designated lead agency for the MMRP and has the overall responsibility for the review of all monitoring reports, enforcement actions, and document disposition. The District will rely on information provided by individual monitors (e.g., CEQA consultant, biologist, archaeologist, paleontologist) as accurate and up to date, and will field check mitigation measure status, as required.

2.1.2 Mitigation Monitoring Team

The mitigation monitoring team, including the construction manager and technical advisors (CEQA consultant, biologist, archaeologist, paleontologist), is responsible for monitoring implementation/compliance with all adopted mitigation measures and conditions of approval. A major portion of the team's work is in-field monitoring and compliance report preparation. Implementation disputes are brought to the District Superintendent and/or his/her designee.

2.1.2.1 MONITORING TEAM

The following summarizes key positions in the MMRP and their respective functions:

- District Construction Manager: Responsible for coordination of mitigation monitoring team, technical consultants, and report preparation and implementing the monitoring program, including overall program administration and document/report clearinghouse and first phase of dispute resolution.
- Technical Advisors: Responsible for monitoring in respective areas of expertise. Report directly to the monitoring program manager.

2.1.3 Recognized Experts

The use of recognized experts on the monitoring team is required to ensure compliance with scientific and engineering mitigation measures. The mitigation monitoring team's recognized experts assess compliance with required mitigation measures, and recognized experts from responsible agencies consult with the District Construction Manager regarding disputes.

3. Mitigation Monitoring Requirements

3.1 PRE-MITIGATION MEETING

A pre-monitoring meeting will be scheduled to review mitigation measures, and explain implementation requirements.

3.2 CATEGORIZED MITIGATION MEASURES/MATRIX

The mitigation measures are shown in Table 3-1 along with schedule, and responsible monitor. The mitigation table will serve as the basis for scheduling the implementation of, and compliance with, all mitigation measures.

3.3 IN-FIELD MONITORING

Project monitors and technical subconsultants shall exercise caution and professional practices at all times when monitoring implementation of mitigation measures. Protective wear (e.g. hard hat, glasses) shall be worn at all times in construction areas.

3.4 COORDINATION WITH CONTRACTORS

The District Construction Manager is responsible for coordination of contractors and for contractor completion of required mitigation measures.

3.5 COMMUNITY INVOLVEMENT

Monitoring reports are public documents and are available for review by the general public at the District office.

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

| Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|--|--|---|-----------------------------------|---|
| CULTURAL RESOURCES | | | | |
| <p>CUL-1 Prior to the removal of the Old Schoolhouse building—via relocation and rehabilitation in conformance with the Secretary's Standards or demolition—the District shall retain qualified individuals to document the facility using the Historic American Building Survey (HABS) Level III standards as a guideline for recording the building through a compilation of photographs, drawings, and written description to record the historic resource:</p> <ul style="list-style-type: none"> • Written Data: The history of the property and description of the historic resource shall be prepared. The Historic Resource Assessment Report of The Old Schoolhouse (DEIR Appendix F) may be used. • Drawings: A sketch plan of the interior floorplan of the building shall be prepared. • Photographs: Large-format photographs and negatives shall be produced to capture interior and exterior views of the Old Schoolhouse structure. At least two large format pictures shall be taken to show the building's setting in context and in relationship to its location. The photographs and negatives must be created using archival stable paper and processing procedures. • Document: The HABS Level III document must be produced on archival-quality paper, and all large format photographs and negatives labeled to HABS standards. A digital version of the HABS document shall be prepared with the hard copy. The final HABS Level III document shall be donated to the Azusa Historical Society and/or other responsible repository within the San Gabriel Valley. | Azusa Unified School District | Prior to removal of the Old Schoolhouse | Azusa Unified School District | |
| TRIBAL CULTURAL RESOURCES | | | | |
| TCR-1 | In the event of an accidental discovery of subsurface items during soil disturbance construction activities, the District shall immediately retain a qualified registered professional archaeologist (RPA) to evaluate the | Qualified Registered Professional Archaeologist (RPA) | During soil-disturbing activities | Azusa Unified School District |

3. Mitigation Monitoring Requirements

Table 3-1 Mitigation Monitoring Requirements

| Mitigation Measure | Responsibility for Implementation | Timing | Responsibility for Monitoring | Monitor (Signature Required) (Date of Compliance) |
|--|-----------------------------------|--------|-------------------------------|---|
| <p>potential resource and make a finding of significance under Section 15064.5 of the California Environmental Quality Act Guidelines. If the RPA determines that the potential resource is of tribal cultural significance, the RPA shall contact liaisons for local Native American tribes, including but not limited to the Gabrieleño Band of Mission Indians–Kizh Nation and their Native Monitor. The RPA and Native Monitor shall assess the find and, as appropriate, develop a plan for recovery, analysis, report, and/or curation of the item to the appropriate entity or Native American tribe. The find shall be reported to an accredited and permanent scientific institution, such as the South Central Coastal Information Center.</p> | | | | |