



March 2018 | Final Environmental Impact Report
State Clearinghouse No. 2017081047

HUNTINGTON PARK HIGH SCHOOL COMPREHENSIVE MODERNIZATION

Los Angeles Unified School District

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
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1. Introduction

1.1 CEQA COMPLIANCE

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

CEQA Guidelines, Section 15132, states that the Final EIR shall consist of:

- (a) The Draft Environmental Impact Report (Draft EIR) or a revision of the Draft;
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agency comments on the Draft EIR;
- (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 Draft EIR for the Los Angeles Unified School District's (LAUSD) Huntington Park High School Comprehensive Modernization Project (Project) during the public review period, which began January 3, 2018, and closed February 19, 2018. In compliance with CEQA and the CEQA Guidelines, the Final EIR represents the independent judgment of the lead agency (LAUSD). This document and the circulated Draft EIR comprise the Final EIR.

1.2 FORMAT OF THE FINAL EIR

This document is organized as follows:

Chapter 1. Introduction. This chapter describes CEQA requirements and content of this Final EIR.

Chapter 2. Response to Comments. This chapter provides a list of agencies, organizations, and persons that commented on the Draft EIR; copies of comment letters received during the public review period; and individual responses to written comments.

The LAUSD has determined that the text and information in this Final EIR does not constitute the type of significant new information that requires recirculation of the Draft EIR for further public comment under CEQA Guidelines Section 15088.5. None of the material provided in the Final EIR indicates that the Project will result in a new significant environmental impact not previously disclosed in the Draft EIR. Additionally, none of the material in the Final EIR indicates that there would be a substantial increase in the severity of a

1. Introduction

previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

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 Draft EIRs 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 sent at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this Final EIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on Draft EIRs.

2. Response to Comments

Section 15088 of the CEQA Guidelines requires the lead agency (LAUSD) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the Draft EIR and prepare written responses.

This chapter provides all written responses received on the Draft EIR during the public review period (January 3, 2018 – February 19, 2018) and the LAUSD's responses to each comment.

To facilitate review of the responses, each comment letter has been reproduced and assigned a letter (A through H). Individual comments have been numbered and the comments are followed by responses with references to the corresponding comment. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented. Changes to the Draft EIR 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 Draft EIR during the public review period.

Reference	Commenting Person/Agency	Comment Letter Date	Page No.
A	City of Huntington Park Resolution No. 2017-35	January 25 (Resolution dated November 7, 2017)	2-3
B	Gabrieleno Band of Mission Indians – Kizh Nation	January 4	2-11
C	Native American Heritage Commission	January 25	2-15
D	Elsa Avalon, Grandparent/Gardian	January 25	2-21
E	Rodolfo Vallejo, Communities for a Better Environment (CBE)	January 25	2-25
F	Irene Settele, Alumni Association President	January 25	2-31
G	Joe Lawson, Resident	January 25	2-35
H	Manuel Avila, Huntington Park City Council	January 25	2-39
I	State of California Department of Transportation	February 15	2-43
J	Valentin Amezquita	February 17, 2018	2-47
K	METRO	February 19, 2018	2-51

2. Response to Comments

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2. Response to Comments

A – City of Huntington Park Resolution No. 2017-35 (6 pages)



Office of the City Clerk

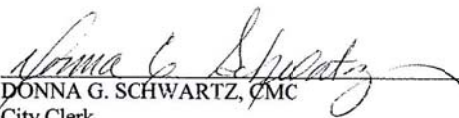
CERTIFICATION

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF HUNTINGTON PARK)

I, **DONNA G. SCHWARTZ, CITY CLERK** of the **CITY OF HUNTINGTON PARK, CALIFORNIA**, do hereby attest, under penalty of perjury, the foregoing to be a full, true and certified copy of: RESOLUTION NO. 2017-35, THAT WAS APPROVED BY THE CITY COUNCIL OF THE CITY OF HUNTINGTON PARK, CALIFORNIA, AT THE REGULAR CITY COUNCIL MEETING ON TUESDAY, November 7, 2017, the original of which is on file in the Office of the City Clerk at City Hall, 6550 Miles Avenue, Huntington Park, California.

A-1

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of the City of Huntington Park, this 13th day of November 2017.


DONNA G. SCHWARTZ, CMC
City Clerk

(SEAL)

6550 Miles Avenue Huntington Park, CA 91765 www.hpcap.gov (323) 581-6300

2. Response to Comments

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RESOLUTION NO. 2017-35

**A RESOLUTION OF THE CITY COUNCIL OF THE
CITY OF HUNTINGTON PARK SUPPORTING THE
MAINTENANCE OF AN INDOOR POOL AT
HUNTINGTON PARK HIGH SCHOOL**

WHEREAS, historic properties and resources are rare and valuable assets of a community that cannot be replaced; and

WHEREAS, the City of Huntington Park ("City") promotes the protection, enhancement, preservation, and designation of historic properties and resources for the culture, education, enjoyment and economic welfare of the City's resident; and

WHEREAS, Section 37361 of the California Government Code grants cities the power to protect properties and resources of historical and aesthetic interest; and

WHEREAS, Title 9, Chapter 3, Article 18 of the Huntington Park Municipal Code implements the City's historic preservation goals, policies and programs; and

WHEREAS, Huntington Park High School ("HPHS") was founded in 1909, but the earliest buildings on the campus were constructed in the 1920s; and

WHEREAS, following a 6.4-magnitude 1933 Long Beach Earthquake ("1933 Earthquake"), school buildings that either were destroyed or suffered major damage were removed and completely reconstructed, while a few buildings were only partially reconstructed; and

WHEREAS, HPHS was evaluated as part of a historic resources survey conducted by the Los Angeles Unified School District ("LAUSD") in 2002; and

WHEREAS, HPHS was assigned a California Historical Resources Status Code of "3S", which indicates that the campus "appears eligible for the National Register of Historic Places or California Register of Historic Resources through survey evaluation;

and

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2. Response to Comments

1 **WHEREAS**, based on information and belief the existing gymnasium and indoor
2 pool were constructed prior to the 1933 Earthquake, in 1923; and

3 **WHEREAS**, LAUSD is proposing a comprehensive modernization of HPHS; and

4 **WHEREAS**, the HPHS Comprehensive Modernization Project ("Project") is
5 designed to address the most critical physical concerns of the building and grounds at
6 the campus while upgrading, renovating, modernizing, and reconfiguring the campus to
7 provide facilities that are safe, secure, and better aligned with the current instructional
8 program; and

9 **WHEREAS**, in August of 2017, an Initial Study was prepared in accordance with
10 CEQA and CEQA Guidelines; and

11 **WHEREAS**, pre-construction and design activities began in the fourth quarter of
12 2015 and are anticipated to be completed in the third quarter of 2019; and

13 **WHEREAS**, the campus wide modernization process will occur in several phases,
14 so that HPHS may continue operating while school is in session; and

15 **WHEREAS**, Phase 3 of the proposed Project includes, the partial demolition and
16 removal of the Gymnasium (Building 13), including the demolition and removal of the
17 historic HPHS indoor pool; and

18 **WHEREAS**, Phase 5 of the proposed Project includes, the construction of an
19 outdoor pool of 25-yards x 25 meters, including decking, fencing, and bleacher seats as
20 well as a 1-story pool support building that would be located immediately north of the
21 new gym building, housing: field restrooms, pool equipment storage, and chemical
22 storage; and

23 **WHEREAS**, the City Council received public calls for the maintenance of an
24 indoor pool at HPHS during its regular City Council meeting on September 19, 2017; and

25 **WHEREAS**, the indoor pool at HPHS is a historic city hallmark valued by the
26 public; and

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2. Response to Comments

1 **WHEREAS**, the public expressed preference for an indoor pool, since an indoor
2 pool is accessible to HPHS students and the general public year-round regardless of
3 weather conditions; and

4 **WHEREAS**, the maintenance cost of an indoor pool is generally lower than an
5 outdoor pool, since it is not exposed to outside dust and debris that would normally make
6 its way into an outdoor pool; and

7 **WHEREAS**, generally an indoor pool is sheltered from direct sunlight, which
8 means it is generally not exposed to UV radiation and may not require as much
9 chlorination and sanitization;

10 **WHEREAS**, the City supports the maintenance of an indoor pool at HPHS to
11 preserve this historical hallmark and preserve students' and the public's continued
12 enjoyment of an indoor pool at HPHS

13
14 **NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF HUNTINGTON PARK**
15 **DOES HEREBY RESOLVE AS FOLLOWS:**

16
17 **SECTION 1.** The indoor pool at HPHS is a historic hallmark valued by students and
18 residents.

19
20 **SECTION 2.** The public called for the maintenance of an indoor pool at HPHS as part
21 of the Comprehensive Modernization Project.

22
23 **SECTION 2.** The City supports the maintenance of an indoor pool at HPHS as part of
24 the Comprehensive Modernization Project.

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26 **SECTION 3.** This Resolution shall take effect immediately upon its adoption.

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2. Response to Comments

1 **SECTION 4.** The City Clerk shall certify to the adoption of this Resolution.

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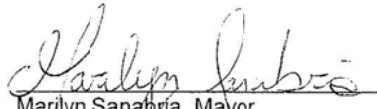
3 **THE FOREGOING RESOLUTION** is approved and adopted by the City Council of the
4 City of Huntington Park this 7th day of November 2017.

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Marilyn Sanabria, Mayor

9 ATTEST:

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Donna G. Schwartz, CNC
City Clerk

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2. Response to Comments

CERTIFICATION

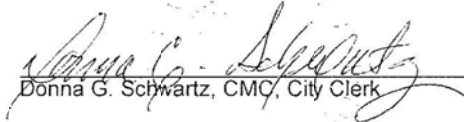
STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF HUNTINGTON PARK)

I, Donna G. Schwartz, City Clerk of the City of Huntington Park, California, do hereby certify that the foregoing Resolution No. 2017-35 was duly passed and adopted by the City Council of the City of Huntington Park at a regular meeting of the City Council held on the 7th day of November 2017, by the following vote, to wit:

AYES: Council Member(s): Macias, Ortiz, Avila, Vice Mayor Pineda and Mayor Sanabria

ABSENT: Council Member(s): None

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Seal of the City of Huntington Park, this 8th day of November 2017.


Donna G. Schwartz, CMC, City Clerk

2. Response to Comments

Response to Comment A - City of Huntington Park 2017 Resolution.


- A-1 The District appreciates the information provided by the City on its support of maintaining the indoor pool at Huntington Park High School (HPHS). The Resolution does not provide any specific comments related to the Draft EIR or environmental impacts of the proposed Project. However, it will be included as part of the administrative record and made available to the decision makers (the Board of Education) for consideration and review, prior to a final decision on the proposed Project. The proposed Project entails removal of the existing Gymnasium Building (including the indoor pool) and construction of a new Gymnasium Building with an outdoor pool.

2. Response to Comments

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2. Response to Comments

Comment Letter B – Gabrieleno Band of Mission Indians – Kizh Nation (1 page)



Gabrieleno Band of Mission Indians – Kizh Nation
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

January 4, 2018

Regarding: Huntington Park High School Comprehensive Modernization project

Dear Ms. Eimon Smith,

This email is in response to the above referenced project located at 6020 Miles Ave Huntington Park Los Angeles. The project location is within our Ancestral territory which may have potential for discoveries of our cultural resources. Therefore, we would like to request that one of our Native Monitors be present during any and all ground disturbances. B-1

Should you have any questions or concerns, please contact our office at 844-390-0787.

Thank you,

Andrew Salas
Chairman, Gabrieleno Band of Mission Indians-Kizh Nation

Gabrieleno Band of Mission Indians – Kizh Nation PO Box 393 Covina, CA 91723 (626) 926-4131
website: www.gabrielenoindians.org email: gabrielenoindians@yahoo.com

2. Response to Comments

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2. Response to Comments

Response to Comment Letter B - Gabrieleno Band of Mission Indians – Kizh Nation, dated January 4, 2018.

- B-1 Comment acknowledged. In response to the Gabrieleno Band of Mission Indians-Kizh Nation's comment letter on the HPHS Comprehensive Modernization Initial Study and Notice of Preparation (see Draft EIR Appendix A), OEHS staff participated in a conversation via conference call with the Tribe on September 28, 2017 at 1:00 PM. Although the Initial Study determined that the Project would not be expected to result in impacts to tribal cultural resources, the District incorporated Mitigation Measure TCR-1 (MM-TCR-1) following Tribal consultation to ensure protection of unanticipated discoveries associated with Tribal cultural resources.

MM-TCR-1. LAUSD shall have a Native American monitor on-call during construction-related ground disturbance activities. The Native American monitor selected by the District must have at least one or more of the following qualifications: at least one year of experience providing monitoring Native American support during similar construction activities; be designated by the Tribe as capable of providing Native American monitoring support; and/or have a combination of education and experience with Tribal cultural resources. Prior to the start of the construction, the monitor shall provide the construction crew(s) with a brief summary of the sensitivity of Tribal cultural resources, the rationale behind the need for protection of these resources, and information on the initial identification of Tribal cultural resources.

Subsequently, the monitor shall remain on-site for the duration of the ground disturbances at the site to ensure the protection of any other resources that may be in the area.

The Native American Monitor will complete monitoring logs on a daily basis. The logs will provide descriptions of the daily activities, including construction activities, locations, soil, and any Tribal cultural resources identified.

MM-TCR-1 is consistent with SC-TCR-1 and was incorporated into the Draft EIR. The Tribal meeting and measure is documented in the Table 1-1 on page 1-10 of the Draft EIR.


These comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter C – Native American Heritage Commission (5 pages)

<p>STATE OF CALIFORNIA NATIVE AMERICAN HERITAGE COMMISSION Environmental and Cultural Department 1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 Phone (916) 373-3710 Fax (916) 373-5471</p>	<p>Edmund G. Brown Jr., Governor </p>
<p>January 25, 2018</p>	
<p>Eimon Smith Los Angeles Unified School District 333 South Beaucry Avenue, 21st Floor Los Angeles, CA 90017</p>	
<p>Sent via e-mail: eimon.smith@lausd.net</p>	
<p>Re: SCH# 2017081047, Huntington Park High School Comprehensive Modernization Project, Community of Huntington Park; Los Angeles County, California</p>	
<p>Dear Mr. Smith:</p>	
<p>The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary; the Introduction and Project Description; the Environmental Analysis, Section 5.1, Cultural Resources; and the Initial Study, section V, Cultural Resources and section XVII Tribal Cultural Resources, prepared by PlaceWorks for the Los Angeles Unified School District. We have the following concerns:</p>	<p>C-1</p>
<p>1. Stipulation that no tribes have provided contact request letters under AB-52 is in error. Three of the five Gabrieleno tribes affiliated to the area have sent letters to the Los Angeles Unified School District (in 2015 and 2016) requesting project information and the opportunity to consult. Discussions under AB-52 may include the type of document prepared; avoidance, minimization of damage to resources; and proposed mitigation. Please provide documentation that government-to-government consultation is conducted as per AB-52 requirements.</p>	<p>C-2</p>
<p>a. The NAHC further recommends that consultation outreach should be done for all of the tribes on the NAHC list, which is consistent with Best Practices. Please refer to: http://nahc.ca.gov/wp-content/uploads/2015/04/AB52TribalConsultationRequirementsAndBestPractices_Revised_3_9_16.pdf</p>	
<p>2. Lack of consultation with tribes traditionally and culturally affiliated to the project area or lack of documented resources does not mean there are no potential impacts and does not preclude inadvertent finds. Mitigation for Tribal Cultural Resources is required with or without consultation with tribes. Mitigation measures specifically addressing inadvertent finds of Tribal Cultural Resources separately and distinctly from Archaeological Resources should be included in the document. Mitigation language for archaeological resources (such as data recovery and curation) is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources. For sample mitigation measures for Tribal Cultural Resources, please refer to California Natural Resources Agency, (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf</p>	<p>C-3</p>
<p>3. In the Environmental Analysis section 5.1 Cultural Resources, standard conditions for Archaeological Resources and Tribal Cultural Resources are missing. These conditions appear in the initial Study but are not included in the DEIR document.</p>	<p>C-4</p>
<p>4. Mitigation language for archaeological resources in SC-CUL-8 (such as data recovery and curation) is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources.</p>	<p>C-5</p>
<p>ADDITIONAL INFORMATION: The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).</p>	<p>C-6</p>
<p>CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse</p>	
<p>¹ Pub. Resources Code § 21000 et seq. ² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b) ³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1) ⁴ Government Code 65352.3 ⁵ Pub. Resources Code § 21074</p>	

2. Response to Comments

change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment.⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://naac.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

Please contact me at gayle.totton@naac.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,



Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse

C-6
cont'd

⁶ Pub. Resources Code § 21084.2
⁷ Pub. Resources Code § 21084.3 (a)
⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

2. Response to Comments

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project,⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10**. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss** both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 **shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program**, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report **may not be certified**, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21030.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

¹⁸ Pub. Resources Code § 21082.3 (d)

2. Response to Comments

- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
 - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easements voluntarily conveyed.²³
 - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴
- The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

C-6
cont'd

²³ (Civ. Code § 815.3 (d)).

²⁴ (Pub. Resources Code § 5097.991).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).

2. Response to Comments

Response to Comment Letter C – Native American Heritage Commission, dated January 25, 2018.

- C-1 This comment is an introductory paragraph and set of general remarks; no response required.
- C-2 Both the Notice of Preparation (NOP; August 2017) and the Notice of Availability (NOA; January 2018) were sent to six tribes: Gabrieleno Band of Mission Indians - Kizh Nation, Gabrielino /Tongva Nation, San Fernando Band of Mission Indians, Gabrielino Tongva Indians of California Tribal Council, Gabrieleno/Tongva San Gabriel Band of Mission Indians, and the Fernandeno Tataviam Band of Mission Indians. The Gabrieleno Band of Mission Indians - Kizh Nation provided comments on both the NOP and NOA.

In response to the Gabrieleño Band of Mission Indians-Kizh Nation's comment letter on the HPHS Comprehensive Modernization Initial Study and NOP, OEHS staff participated in a conversation via conference call with the Tribe on September 28, 2017 at 1:00 PM. The addition of MM-TCR-1 was the result of this conversation. The Tribal meeting and new measure is documented in the Table 1-1 on page 1-10 of the Draft EIR.

- C-3 As documented on Table 1-1 on page 1-10 of the Draft EIR, the Draft EIR includes a tribal cultural standard condition (SC-TCR-1) and a mitigation measure (MM-TCR-1) that are separate and distinct from archaeological resources.
- C-4 LAUSD Standard Conditions of Approval were included in the Draft EIR as Appendix E.
- C-5 LAUSD Standard Condition of Approval SC-CUL-8 is not a mitigation measure, and is not included in tribal cultural resources section. As shown in Draft EIR Appendix E, SC-CUL-8 is only included in cultural resource section related to historic and archaeological resources. Appendix E includes a standard condition, SC-TCR-1 for tribal cultural resources and the Draft EIR includes MM-TCR-1 for tribal cultural resources that are separate and distinct from archaeological resources.
- C-6 This comment outlines existing CEQA regulations and guidance. No response is required.

These comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter D – Elsa Avalon, Grandparent/Gardian (comment card)

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: H.P. H School, H.P.
Date / Fecha: 1/25/18
Name / Nombre: Elsa Avalon
Affiliation / Afiliación: Grandparent / Guardian
Address / Dirección: 3612 Linc Oak St, Huntington Park, CA 90255
Comments / Comentarios: Accommodation for Parent parking | D-1

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentarios antes de 19 de Febrero 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Eimon Smith

2. Response to Comments

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2. Response to Comments

Response to Comment Letter D – Elsa Avalon, Grandparent/Guardian, comment card dated January 25, 2018.

D-1 As part of the Project, additional parking will be provided. The Project includes the expansion of parking to accommodate the existing campus needs. Where feasible additional skateboard/bike racks will be provided to expand existing alternative modes of transportation. The additional parking will be provided in new and expanded lots on-site off Belgrave Avenue.

These comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter E – Rodolfo Vallejo, C.B.E. (comment card)

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: HUNTINGTON PARK H-S - MODERNIZATION
Date / Fecha: 01-25-18
Name / Nombre: RODOLFO VALLEJO
Affiliation / Afiliación: C.B.E.
Address / Dirección: 5952 MIDDLETON ST H-PARK CA 90255
Comments / Comentarios: AFTER THE COMPLETION OF THE MENTIONED SCHOOL, INAGURATION: WITH USA MARINE BAND E-1

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentario antes de 19 de Febrero 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Eimon Smith

2. Response to Comments

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: REABILITATION OF H.P.H.S.

Date / Fecha: 01-25-18

Name / Nombre: RODOLFO VALLEJO C.B.E.

Affiliation / Afiliación: C.B.E. SCHOOLS COMMITTEE

Address / Dirección: 5952 MIDDLETON ST

Comments / Comentarios:

{ CREATE JOBS TO LOCAL RESIDENTS → E-2
INCLUDE A SPANISH GASEBO IN THE PROJECT E-3
INCLUDE IN THE SCHOOL PROJECT E-4
A SYSTEM WITH FILTRATION WATER SO

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentario antes de 19 de Febrero 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 2nd Floor, Los Angeles, CA 90017
Attn: Eiron Smith

OUR KIDS - CAN DRINK QUALITY WATER

2. Response to Comments

FIND THE FORMULA TO ATTRACK
THE PARENTS SO THEY CAN PARTICIPATE
IN THE

E-2
Cont'd

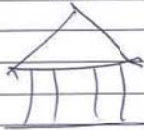
INCLUDE A SPANISH GASEBO
SO OUR KIDS CAN USE AS MEMBER OF LOCAL
ACCORDING TO THE STYLE OF BAND
DESIGN

E-3
Cont'd

EVOLUCION

E-5

PRACTICO FOR PARENTS TO DROP UP
KIDS



2. Response to Comments

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2. Response to Comments

Response to Comment Letter E – Rodolfo Vallejo, C.B.E., comment card dated January 25, 2018.

- E-1 The comment about inauguration with USA Marine Band is acknowledged.
- E-2 Construction jobs would be created during the modernization Project. The District would comply with the Project Stabilization Agreement (PSA) which the Board of Education entered into with local building and construction unions in 1999. The PSA is intended to ensure labor harmony on our jobsites and provide a uniform labor relations framework for the various trades and unions during the Project. Among the goals and objectives of the PSA are to prevent work stoppages or slowdowns, to encourage contracting with small businesses that reflect the diversity of Los Angeles, to hire local workers when possible, to provide a sufficient supply of skilled craft persons and to establish a standardized grievance/dispute resolution procedure(s) when matters do arise. A copy of the PSA is available at the following link: <http://www.laschools.org/new-site/project-stabilization/>.
- Parents are encouraged and welcome to participate in the planning process for this Project. The current campus includes a parent center that will continue to operate following completion of the Project. Notices for this Project were mailed to all parents/guardians of the students that attend HPHS.
- E-3 The proposed Project would modernize and upgrade buildings and facilities to align with the current programmatic and operational needs of the campus while retaining or enhancing program opportunities for future planning. A larger gazebo that accommodates room for a band is not part of the proposed Project at this time.
- E-4 The drinking fountains have filtered water for students and staff on campus.
- E-5 There are several drop-off and pick-up zones around the existing school campus. The proposed Project does not include changes to the existing main entrance and student drop-off/pick-up zone off Miles Avenue.

These comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter F – Irene Settele, Alumni Association President (comment card)

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: HPHS - Alumni

Date / Fecha: 1-25-18

Name / Nombre: IRENE SETTELE

Affiliation / Afiliación: Alumni Association President

Address / Dirección: _____

Comments / Comentarios: We would like to ask would it be possible to offer & promote a Scholarship Fundraiser by selling a "Buy a Spartan Brick" for the Gym Building demolition? F-1

"Once a Spartan always a Spartan!" Thank you, Irene

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentarios antes de 19 de febrero 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Eimon Smith

2. Response to Comments

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2. Response to Comments

Response to Comment Letter F – Irene Settele, Alumni Association President, comment card dated January 25, 2018.

- F-1 The comment about the scholarship fundraiser is acknowledged. This comment will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter G – Joe Lawson, Resident (comment card)

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: HP. High.

Date / Fecha: 1-25-18

Name / Nombre: Joe Lawson

Affiliation / Afiliación: President of HP

Address / Dirección: 6519 Templeton St. HP. 90255

Comments / Comentarios: Does this project/plan have a layout to ease flow of traffic along Grand/50th - a lane for parent/student drop-off - pickup of students. Please consider an area for lanes within the project to ease for future traffic and its increase in students.

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentario antes de 19 de Febrero 2018 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Eimon Smith

G-1

2. Response to Comments

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2. Response to Comments

Response to Comment Letter G – Joe Lawson, Resident, comment card dated January 25, 2018.

- G-1 The proposed Comprehensive Modernization project would not result in an increase in students at HPHS. Potential impacts to transportation and traffic were evaluated in the Initial Study (Draft EIR Appendix A); where it was determined that the Project would not result in significant impacts related to transportation and traffic and no mitigation measures or further study were required. This comment will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter H – Manuel Avila, Huntington Park City Council (comment card)

COMMENT CARD / TARJETA DE COMENTARIO
Public Meeting / Reunión Pública

Huntington Park High School Comprehensive Modernization Project
Modernización Integral de la Escuela Preparatoria de Huntington Park

Project / Proyecto: _____
Date / Fecha: _____
Name / Nombre: MANJEL "MANNY" AVILA
Affiliation / Afiliación: H.P. CITY COUNCIL
Address / Dirección: _____
Comments / Comentarios: Please keep us informed about the project. Let us know thru The City Manager or the Mayor if the City can be of any help or assistance in the realization of the school modernization. H-1
Thank you

Written comments must be received no later than February 19, 2018 at the following address:
Envía su comentarios antes de 19 de Febrero 2018 a la siguiente dirección:
LaUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attn: Eimon Smith

2. Response to Comments

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2. Response to Comments

Response to Comment Letter H – Manuel Avila, Huntington Park City Council, comment card dated January 25, 2018.

H-1 Comment acknowledged. The District will keep the City of Huntington Park informed about the project.

This comment will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter I – State of California Department of Transportation (2 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7—OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
www.dot.ca.gov



*Serious drought.
Making Conservation
A California Way of Life!*

February 15, 2018

Ms. Eimon Smith
Los Angeles Unified School District
333 South Beaudry Avenue
Los Angeles, CA, 90017

RE: Huntington Park High School
Comprehensive Modernization
Vic: LA-5 / PM: 15.588
GTS# 07-LA-2017-01294
SCH# 2017081047

Dear Ms. Smith:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of modernization improvements to Huntington Park High School. Changes will include demolition, construction, and renovation activities. Other improvements include campus-wide infrastructure upgrades, including water, irrigation, gas, sewer, fire, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, and exterior paint. | I-1

Upon reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

The DEIR states 51 car parking spaces will be added in addition to an existing 159 on-site car parking spaces, resulting in a total of 210 car parking spaces. The stated purpose of the parking expansion is to:

- accommodate existing parking demand
- reduce parking-related congestion
- increase safety
- meet District required ratio of 2.5 spaces per classroom. | I-2

Existing research on parking suggests that providing more free parking merely enables and encourages more driving. As such, the addition of 51 more spaces may have unintended consequences that counteract the intentions behind the parking addition. While the comprehensive modernization is not intended to increase capacity or enrollment at the school, by adding more car parking the project may actually encourage more site users to drive who might otherwise walk, bicycle, carpool, or take public transit. | I-1

No mention is made of existing or new bicycle parking to be installed, despite the fact that students are more likely than the general public to walk and bicycle to and from the project site. By investing in more parking for cars but omitting parking for active transportation (bicycling, | I-3

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

2. Response to Comments

Ms. Eimon Smith
February 15, 2018
Page 2

skateboard, scooter) the project disproportionately promotes driving above other modes. This is inconsistent with State and Caltrans policy goals. The lead agency is encouraged to also incorporate measures that can promote active transportation. In the absence of such active transportation amenities, site users (including students, facility and staff) may be unable, unpermitted, or discouraged from using alternate modes. Please note the relative cost of investing in active transportation is minor compared to investments in automobile infrastructure.

If you have any questions regarding these comments, please contact project coordinator Severin Martinez, at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# LA-2017-01294.

Sincerely,



FRANCES LEE
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

2. Response to Comments

Response to Comment Letter I – State of California Department of Transportation, dated February 15, 2018.

- I-1 Introductory paragraph; no response required.
- I-2 The additional parking is required to accommodate the current demand for parking on the campus. Some students currently driving to the school are parking in the surrounding neighborhoods. The Project would not encourage driving over other modes. Where feasible, additional bike racks, skateboard towers, and other storage facilities would be installed to provide more opportunities for alternative means of transportation. The exact amount will be finalized as the design is refined and finalized.
- I-3 As previously noted, additional bike racks, skateboard towers, and other storage facilities would be installed to provide more opportunities for alternative means of transportation. The exact amount will be finalized as the design is refined and finalized.

This comment will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Email J – Valentin Amezcuita (1 page)

From: Valentin Amezcuita
Sent: Saturday, February 17, 2018 12:54 AM
To: CEQA-comments@lausd.com
Subject: HPHS Comp Mod Public Comments on the DEIR

Dear LAUSD staff,

I've briefly reviewed subject: DEIR and have the following comment/suggestion:

Even though your analysis has determined that there is no significant impact to energy resources (DEIR Page 1-9), I would still like to underscore that given the very well-known relationship between water conservation and energy intensity (the energy-water nexus and the energy needed to convey water to the end user), there is an opportunity to perform more water conservation (with the use of treated graywater generated onsite for reuse onsite and thus offset limited potable water supplies – we have a drought and this year is amongst the driest ever) which would in turn result in less energy used as well as a reduction of the concomitant greenhouse gases (GHGs) that would be avoided and otherwise generated absent these kinds of efforts.

J-1

Given that using innovative technology to treat this graywater for onsite use (subsurface for landscaping or other green areas), some possible funding could come from AB 32 monies for mitigating GHG impacts to the climate. These and other BMPs would go a long way toward addressing these challenges a drop at a time likened to the butterfly effect.

Look forward to LAUSD incorporating this discussion and actions based on the foregoing input in existing or new schools. Thank you for your consideration.

Valentin P. Amezcuita
Long-time resident of Huntington Park and graduate of HPHS

2. Response to Comments

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2. Response to Comments

Response to Comment Email J – Valentin Amezquita, dated February 17, 2018.

J-1 The proposed Project includes improvements to landscaping throughout the campus in accordance with the District's Standard Conditions of Approval, efficiency policies, guidelines and criteria; and the Collaborative for High Performance Schools (CHPS) which includes criteria for energy efficiencies and water efficiencies amongst other efficiencies. Additionally, the District will realize efficiencies through the replacement of inefficient facilities and buildings with efficient facilities at the HPHS campus.


The comment about the scholarship fundraiser is acknowledged. This comment will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

Comment Letter K – METRO (5 pages)



Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

February 19, 2018

Eimon Smith
Los Angeles Unified School District
Office of Environmental Health and Safety
City of Los Angeles
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

RE: Huntington Park High School (HPHS) Comprehensive Modernization Project – Notice of Availability of a Draft EIR

Dear Mr. Smith:

Thank you for the opportunity to comment on the Notice of Availability of a Draft EIR for the Huntington Park High School (HPHS) Comprehensive Modernization Project (“Project”) located at 6020 Miles Avenue in the City of Huntington Park. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency’s statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro looks forward to collaborating with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County. K-1

Project Description

The Project encompasses most of HPHS and consists of the comprehensive modernization of the campus, including demolition, construction, and renovation activities. The Project includes demolition and removal of eight relocatable buildings and four permanent buildings: 1) Home Economics & Classroom, 2) Power Plant/Boiler Vault Building 1, 3) Annex, and 4) Gymnasium; construction of a new classroom building, a new specialty classroom building and Gymnasium (and outdoor pool); and remodel and modernization of the existing Administration, Science & Classroom, and Buildings.

Metro Comments

West Santa Ana Branch Transit Corridor Alignment K-2

Metro is evaluating a potential new transit corridor connecting southeast Los Angeles County to downtown Los Angeles via the abandoned Pacific Electric right-of-way/West Santa Ana Branch Corridor (PEROW/WSAB), and a combination of local streets and private and Metro-owned rail right-

2. Response to Comments

HPHS Comprehensive Modernization Project
Notice of Availability of Draft EIR– Metro Comments
02/19/18

of-way. The proposed alignment traverses along Randolph Street and includes a rail station near Pacific Blvd./Randolph St., within walking distance to the proposed Project. Currently, Metro is preparing a Draft Environmental Impact Statement/Report, planned for release and public comment in 2019. The WSAB Transit Corridor Project is slated for completion in 2028. For reference, we'd like to direct City staff to the WSAE Transit Corridor Project webpage, which houses the 2013 Alternatives Analysis Report authored by the Southern California Association of Governments (SCAG) as well as Metro's 2015 Technical Refinement Study and the 2017 Northern Alignment Options Screening Report: <https://www.metro.net/wsab>. Please contact Teresa Wong, Senior Manager of Mobility Corridors Planning, with additional questions at 213-922-2854 or wongte@metro.net.

Metro Bus Operations

Metro bus lines 108/358 and 251 operate on East Slauson Avenue and Miles Avenue, adjacent to the proposed Project. One Metro bus stop on East Slauson Avenue is directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

1. Although the Project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stop must be maintained as part of the final Project.
2. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus Operations. Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.
3. Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), pedestrian lighting, as well as a continuous canopy of shade trees, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops. The City should consider requiring the installation of such amenities as part of conditions of approval for the Project.
4. Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.
5. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
6. Metro would like to inform the Project sponsor of Metro's employer and student transit pass programs. The Annual Transit Access Pass (A-TAP) and Student Transit Access Pass (S-TAP) offer efficiencies and group rates to agencies like LAUSD that can offer employees as an incentive to utilize public transit and for students to receive a reduce fare. For more information, contact Devon Deming at 213-922-7957 or DemingD@metro.net.

K-2
con't

Active Transportation

Metro encourages the promotion of bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks for students, as well as secure and enclosed long-term bicycle parking for

K-3

2. Response to Comments

HPHS Comprehensive Modernization Project
Notice of Availability of Draft EIR–Metro Comments
02/19/18

faculty and staff. Bicycle parking facilities should be highly visible, easy to locate, and sited so they can be safely and conveniently accessed. Additionally, the applicant should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as Slauson Station. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

K-3
cont'd

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the “2010 Congestion Management Program for Los Angeles County,” Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

K-4

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 –D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net. Metro looks forward to reviewing the Final EIR. Please send it to the following address:

**Metro Development Review
One Gateway Plaza MS 99-183
Los Angeles, CA 90012-2952**

Sincerely,



Derek Hull
Manager, Transportation Planning
Attachments: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

Page 3 of 3

2. Response to Comments

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2. Response to Comments

Response to Comment from METRO, dated February 19, 2018.

- K-1 This comment includes an introductory paragraph and project summary; no response required.
- K-2 This comment includes information on a potential new transit corridor, along with standard template text and does not specifically address Project-related impacts or the adequacy of the Draft EIR.

Additionally, this comment discusses bus operations on Slauson Avenue and Miles Avenue. This Project would modernize an existing school campus and would not relocate or install any bus facilities or sidewalks, or affect municipal bus operations or schedules, bus stops or shelters. None of the existing campus driveways would be relocated near transit stops. The list of comments does not specifically address the proposed Project or the adequacy of the Draft EIR.

- K-3 The existing school campus has several bicycle parking facilities. As a part of the Project, additional bike racks, skateboard towers, and other storage facilities would be installed to provide more opportunities for alternative means of transportation. The exact amount will be finalized as the design is refined and finalized.
- K-4 This comment outlines State requirements for Congestion Management Program. This Project would not change existing traffic patterns or the number of vehicles on the roadways.

These comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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