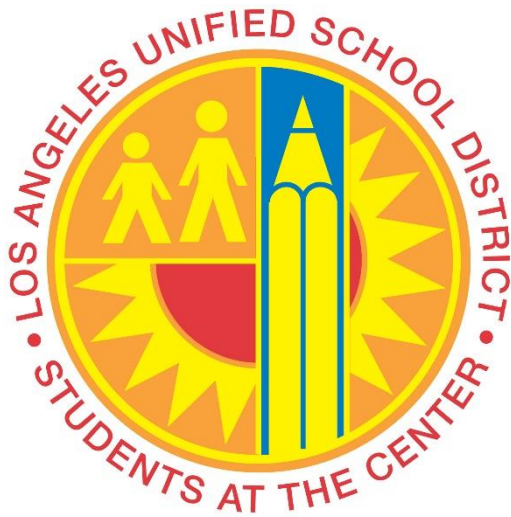


December 2021 | Response to Comments



RISE KOHYANG MIDDLE SCHOOL

Prepared for:

LEAD AGENCY: Los Angeles Unified School District

Office of Environmental Health and Safety

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1. Introduction

1.1 INTRODUCTION

This document includes the public comments received on the Rise Kohyang Middle School Mitigated Negative Declaration (MND) and supporting Initial Study (IS) along with the Lead Agency responses to those comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code, Division 13, Sections 21000 et seq. and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND. In the spirit of public disclosure and engagement, the Los Angeles Unified School District (LAUSD)—as the lead agency for the proposed Project—has responded to all written comments submitted during the 30-day public review period.¹

1.2 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration. Per CEQA Guidelines Section 15072 and 15073, LAUSD determined that an MND would be required for this proposed Project and circulated a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND). The public review period for this CEQA document was from September 30, 2021, to November 1, 2021. Public outreach for the MND included the following methods.

Newspaper Publications

- NOI published in the legal announcement section of *The Daily News* (English) on September 30, 2021.
- NOI published in the legal announcement section of *La Opinión* (Spanish) on September 30, 2021.

U.S. Postal Mail

- NOI (in English, Spanish, and Korean) sent to addresses within 0.25 mile of project site— 685 owner/occupant mailings

Overnight and Certified Mail

- NOI sent to 5 local agencies and 7 Native American tribes.

¹ LAUSD accepted comments for 31 days from September 30, 2021 through November 1, 2021 because October 30, 2021 - the end of the 30-day period was a Sunday.

1. Introduction

Document Availability

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

- Project Site, 1700 and 1710 West Olympic Boulevard, Los Angeles, CA 90004 (NOI only)
- Existing Rise Kohyang Middle School, 3020 Wilshire Boulevard, Los Angeles, CA 90057
 - Rise Kohyang Middle School website: <https://brightstarschools.org/District/Department/9-Public-Documents-Information>
- Pico Union Branch Library, 1030 S Alvarado Street, Los Angeles, CA 90006
- Felipe de Neve Branch Library, 2820 West 6th Street, Los Angeles, CA 90057
- LAUSD Office of Environmental Health and Safety Website
 - CEQA IS-MND: <http://achieve.lausd.net/ceqa>
- CEQAnet Web Portal: <https://ceqanet.opr.ca.gov/>

Community Outreach

Bright Star Schools (BSS) and its representative Pacific Charter Schools Development (PCSD) conducted additional outreach. A community meeting was held on October 12, 2021, at the Bright Star Schools, 600 S. La Fayette Park Place Los Angeles, California 90057, at 6:00 PM. The meeting provided agencies and the public with an opportunity to comment on the proposed Project and the MND.

The meeting was advertised via a 0.25-mile mailing, posting on the Bright Star School website and the LAUSD website, flyers to existing families, and advertised in two local newspapers including The Daily News and La Opinión (published on Thursday, September 30, 2021). Four tables were set up including Design (Pacific Charters School Development), CEQA (PlaceWorks), PEA (PlaceWorks), and School Information (Bright Star Schools). Approximately 12 people were in attendance, and two comments cards were received during the meeting.

1.3 DOCUMENT FORMAT

This document is organized as follows:

Section 1, *Introduction*. This section describes CEQA requirements and content of this document. Additionally, this section describes the public engagement and community outreach that was done for the proposed Project.

Section 2, *Response to Comments*. This section provides a list of interested persons that commented on the MND; comment letters received during the public review period; and individual responses to written comments.

1. Introduction

To facilitate review of the responses, each comment letter has been reproduced and assigned a letter. Individual comments in each letter are numbered, and each letter is followed by responses, with reference to the corresponding comment number.

1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an MND is determined in terms of what is reasonably feasible.

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.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required for MNDs; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

1. Introduction

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2. Response to Comments

This section includes the written comments received on the circulated MND and LAUSD's response to each comment.

Comment Reference	Commenting Person / Agency	Date of Comment	Page Number
A	Max Rosenkrantz	October 12, 2021	7
B	Reynelda Lira	October 12, 2021	12
C	Julia Rodriguez	October 12, 2021	16
D	Aurora Pink	October 13, 2021	20
E ¹	Taylor Spaur	January 7, 2022	27

1: The District received one additional comment via email on January 7, 2022, which was 67 days after the close of the comment period. This comment is attached for reference.

2. Response to Comments

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2. Response to Comments

COMMENT A – Max Rosenkrantz (1 page)

From: Max Rosenkrantz <[REDACTED]>
Sent: Tuesday, October 12, 2021 8:24 AM
To: California Environmental Quality Act Comments <CEQA-Comments@lausd.net>
Subject: Bright Star Charter Middle School

CAUTION: EXTERNAL EMAIL

Dear Committee,

I write in opposition to the proposed Bright Star Charter Middle School. There are far too many schools in this area already, making a bad traffic and parking situation worse. If the students walked to school (as they should) the new school wouldn't be a problem. They don't, so it is.

-Max Rosenkrantz

A-1

2. Response to Comments

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2. Response to Comments

A. Response to Comments from Max Rosenkrantz, submitted via email October 12, 2021.

A-1 Concerns about the potential for increase in traffic and decrease in parking availability near the Project site due to the number of existing schools in the local vicinity are noted.

There are currently three pre-K through 8th grade schools as part of the baseline existing condition located within a quarter-mile of the Project site, including:

- Equitas Academy #3 Elementary Charter, 1050 Beacon Ave, Los Angeles, CA 90015
- 10th Street Elementary School, 1000 Grattan St, Los Angeles, CA 90015
- Immaculate Conception School, 830 Green Ave, Los Angeles, CA 90017

The location of these schools was considered as part of the analysis conducted for the proposed Project, as baseline existing conditions. The proposed Project is a relocation of an existing school located one mile northwest from the Project site. Therefore, there is already an existing student population associated with this school and therefore an identified need. As discussed in Section 3.1.5, *Operation*, of this MND, school hours for the proposed Project would be 8:10 am to 2:45 pm, and some teachers and students may be on campus after school hours; however, the relocated middle school operation hours would differ from the start and end times at the other schools. The staggered school operation start and end times should offset or reduce school related traffic.

As discussed in Section XIV, *Pedestrian Safety*, of this MND, to improve operation near the Project site reduce pedestrian hazards, the proposed Project would comply with SC-PED-5 which requires compliance with LAUSD School Design Guide for new student drop-off, pick-up, bus loading areas, and parking areas; and the proposed Project would implement MM-PED-1, which will required the Charter School administrators to prepare a Traffic Control Plan to minimize traffic congestion and ensure a safe path of travel for walking and biking to school. This is in consideration of the baseline conditions of the other schools in the vicinity.

In addition, as discussed in Section XVIII, *Transportation*, of this MND, the proposed Project is estimated to generate a total of 643 daily vehicle trips, with an estimated daily work vehicle miles traveled (VMT) of 10.6 per employee, which would be greater than the Central Area Planning Commission (APC) significance threshold of 7.6 daily work VMT per employee. However, mitigation measures (MM-TR-1 and MM-TR-2) have been identified to reduce the impact of daily work VMT per employee, including transit subsidies and implementation of a rideshare program for employees. After implementation of mitigation, the proposed Project would generate a total of 507 daily vehicle trips and an estimated daily work VMT of 7.2 per employee. Thus, the proposed Project would result in a daily work VMT less than the Central APC significance threshold of 7.6 daily work VMT per Employee. The proposed Project would also comply with SC-T-2 which would require vehicular access and parking of the proposed Project to comply with the Vehicular Access and Parking guidelines of the School Design Guide, and SC-T-3 that requires coordination and agreement with the City on the following:

2. Response to Comments

- Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the proposed Project.
- Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number, and location of intersections to be studied, and traffic impact thresholds.
- Implementation of SR2S, traffic control and pedestrian safety devices.
- Fair share contribution and/or other mitigation measures for potential traffic impacts.
- Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.
- Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction.
- Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.

Therefore, impacts due to traffic congestion and decreased parking near the Project site, in consideration of the other surrounding land uses including schools, have been determined to be less than significant.

The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang Middle School project.

2. Response to Comments

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2. Response to Comments

COMMENT B – Reynelda Lira (1 page)

COMMENT CARD / TARJETA De COMENTARIO	
Community Meeting / Reunión Comunidad	
Rise Kohyang Middle School / Escuela Secundaria Rise Kohyang	
October 12, 2021 / 12 de octubre de 2021	
Name / Nombre:	Reynelda Lira
Affiliation / Afiliación:	
Address / Dirección:	
Comments / Comentarios:	Me encanta el proyecto Es una buena inversión y sobre todo la seguridad que se puede ver en el Modelo del Proyecto se mira muy hermoso Estoy feliz de que este proyecto se aga Delidad muchisimas gracias por este proyecto con
Written comments must be received no later than October 30, 2021 at the following address: <i>Envia su commentaios antes 30 de octubre de 2021 a la siquient dirección:</i> LAUSD Office of Environmental Health and Safety 333 South Beaudry Avenue, 21 st Floor, Los Angeles, CA 90017 Attention: Eimon Smith	

B-1

Spanish Comment

B-1 Me encanta el Proyecto. Es una buena inversion y sobre todo la seguridad que se puede ver en el modelo del Proyecto. Se mira muy hermoso. Estoy muy feliz de que este Proyecto se haga realidad. Muchisima gracias por este Proyecto.

English Translation

B-1 I love the Project. It is a good investment and above all the security that can be seen in the Project model. It looks very beautiful. I am very happy that this Project is coming true. Thank you very much for this Project.

2. Response to Comments

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2. Response to Comments

B. Response to Comments from Reynelda Lira, submitted October 12, 2021 at the Community Meeting.

B-1 The comments in support of the proposed Project are acknowledged. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang Middle School project.

2. Response to Comments

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2. Response to Comments

COMMENT C – Julia Rodriguez (1 page)

COMMENT CARD / TARJETA De COMENTARIO	
Community Meeting / Reunión Comunidad	
Rise Kohyang Middle School / Escuela Secundaria Rise Kohyang	
October 12, 2021 / 12 de octubre de 2021	
Name / Nombre:	Julia Rodriguez
Affiliation / Afiliación:	
Address / Dirección:	
Comments / Comentarios:	El proyecto es fantástico las escuelas Bright Star ofrecen muchas capacidades a todos los estudiantes. Nos apasiona saber que hay preocupación al tema educativo, construyendo mejores instalaciones.
Written comments must be received no later than October 30, 2021 at the following address: Envía su comentario antes 30 de octubre de 2021 a la siguiente dirección: LAUSD Office of Environmental Health and Safety 333 South Beaudry Avenue, 21 st Floor, Los Angeles, CA 90017 Attention: Eimon Smith	

C-1

Spanish Comment

C-1 El Proyecto es fantástico. Las escuelas Bright Star ofrecen muchas capacidades a todos los estudiantes. Nos apasiona saber que hay preocupación el tema educativo, construyendo mejores instalaciones.

English Translation

C-1 The Project is fantastic. Bright Star schools offer many capabilities to all students. We are pleased to know that there is concern about the educational issue, building better facilities.

2. Response to Comments

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2. Response to Comments

C. Response to Comments from Julia Rodriguez, submitted October 12, 2021 at the Community Meeting.

- C-1 The comments in support of the proposed Project are acknowledged. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang Middle School project.

2. Response to Comments

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2. Response to Comments

COMMENT D – Aurora Pink (Page 1 of 3)

From: Aurora Pink [REDACTED]
Sent: Wednesday, October 13, 2021 3:48 PM
To: California Environmental Quality Act Comments <CEQA-Comments@lausd.net>
Subject: Bright Star Charter Middle School

CAUTION: EXTERNAL EMAIL

Hello,

My name is Aurora Corona. I am a Pico Union Neighborhood Council Board Member. However, I am making this comment as resident living near the proposed site for Bright Star Charter Middle School. I am in opposition of this project for the following reasons:

- There is already an oversaturation of schools in this area (See attachment 2)
- Drop-offs and pick-ups from schools cause traffic jams
 - Union Avenue is a highly travelled one lane in each direction street. Every morning and afternoons there is a horrific traffic jam stretching from Olympic heading southbound to 11th Street and westbound on to Beacon.
- Proposed school site is only ½ block away from Equitas on Beacon and 11th and 10TH Street Elementary School (See attachment 1)
 - Residents can only expect more traffic jams and more circulating traffic on neighboring residential streets.

The current parking lot is an eyesore. However, a Target or Trader Joe's would be more beneficial to the community rather than another school. We have way too many as it is.

I want to make it clear that I am not against education. Schools are extremely essential, but this location is not the right place for it.

Thank you.

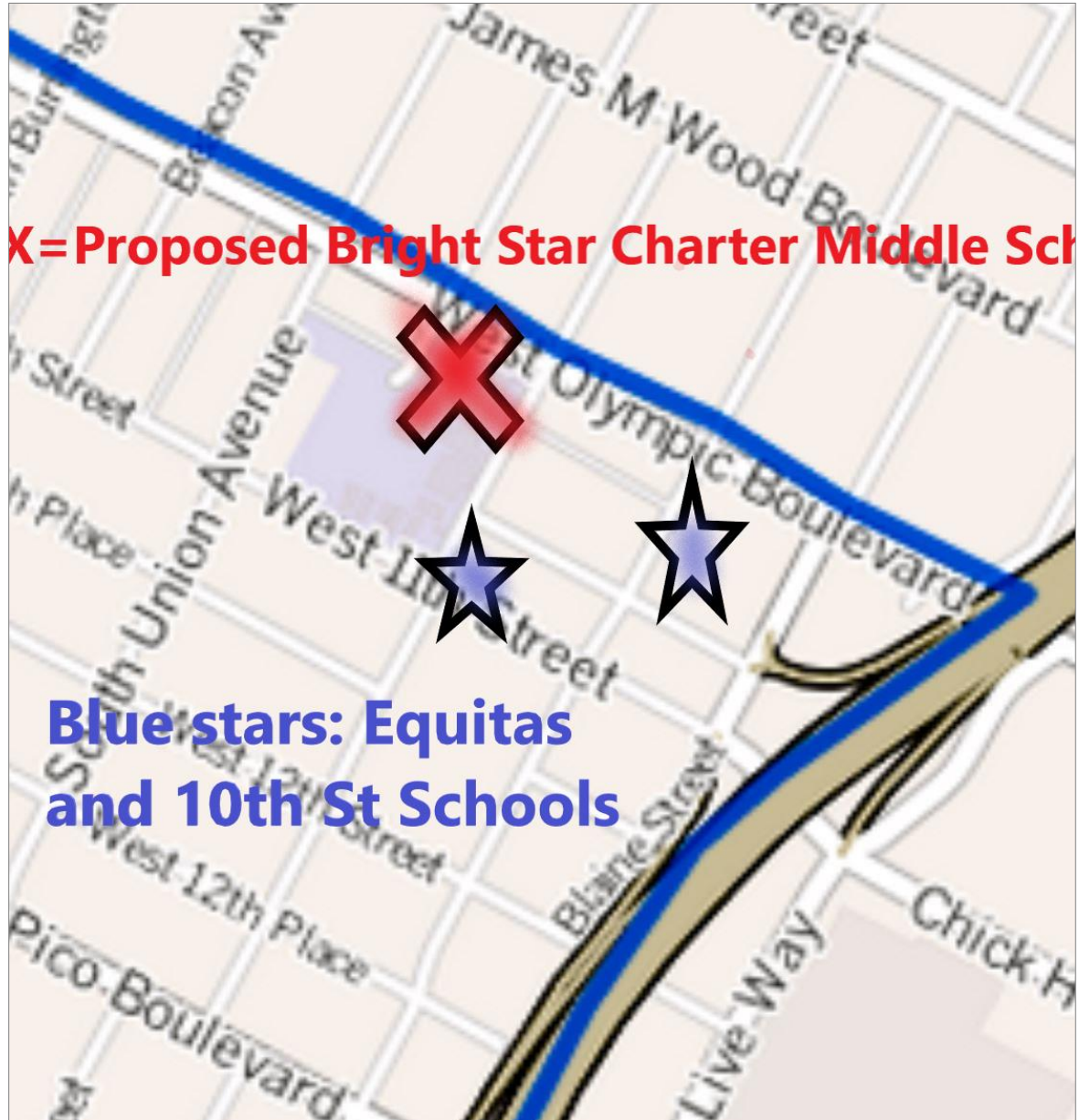
Sent from [Mail](#) for Windows

D-1

D-2

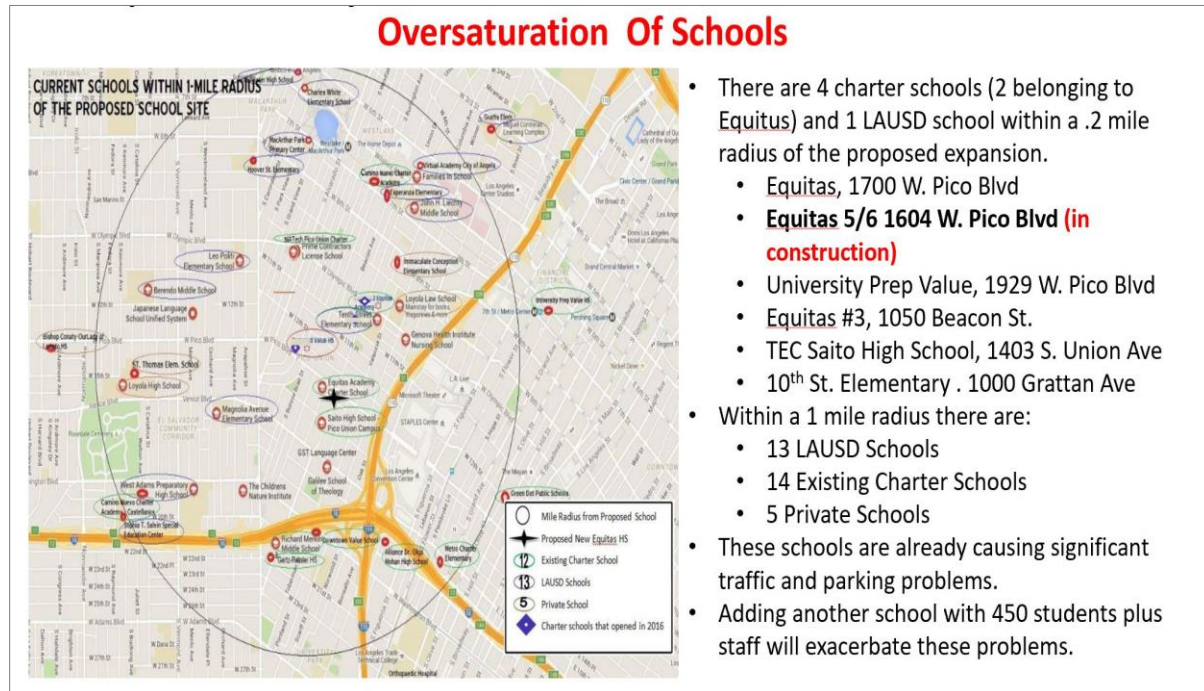
2. Response to Comments

COMMENT D – Aurora Pink (Page 2 of 3)



2. Response to Comments

COMMENT D – Aurora Pink (Page 3 of 3)



2. Response to Comments

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2. Response to Comments

D. Response to Comments from Aurora Pink, submitted via Email October 13, 2021.

- D-1 Concerns about the potential for increase in traffic near the Project site due to the amount of schools in the local vicinity are noted.

As discussed in response A-1, there are currently three pre-K through 8th grade schools that were included as part of the baseline existing condition within a quarter-mile of the Project site, including Equitas Academy #3 Elementary Charter, 10th Street Elementary School, and Immaculate Conception School. School hours for the proposed Project would be 8:10 am to 2:45 pm, and some teachers and students may be on campus after school hours; however, the relocated middle school operation hours would differ from the start and end times at the other schools (see Section 3.1.5, *Operation*, of this MND).

Additionally, as discussed in the Transportation Impact Assessment (TIA) that was prepared for the proposed Project (see Appendix G of this MND), it was determined that the proposed Project's weekday AM and PM peak hour traffic volumes would not cause or substantially extend vehicle queuing at the intersections of Burlington Avenue and Olympic Boulevard, Beacon Avenue and Olympic Boulevard, and Beacon Avenue and 11th Street. Student loading and unloading would occur in the on-site drop-off/pick-up area located within the existing alley (see Figure 6b, *Conceptual Site Plan (Level 1)* of this MND). The drop-off/pick-up area can effectively accommodate one lane of queued vehicles (15 vehicles), plus a bypass lane to allow vehicles to bypass the queue should there be delay related to the passenger loading/unloading of one or more of the queued vehicles.

The forecast peak demand of queued vehicles, which would occur during the morning student drop-off period, is six vehicles; thus, vehicles are not expected to queue onto Beacon Avenue, and it is concluded that the drop-off/pick-up area can accommodate passenger loading and unloading demand. While passenger loading and unloading would occur within the on-site drop-off/pick-up area, some intermittent curbside loading/unloading may occur along the Olympic Boulevard and Beacon Avenue frontages; however, no pedestrian or bicycle conflicts due to potential loading/unloading activities are anticipated to occur. Accordingly, Project-related trips are not expected to queue onto Beacon Avenue.

In addition, Bright Star Schools would ensure that all staff arrive to campus prior to commencement of the student drop-off period. Therefore, it is concluded that the planned drop-off/pick-up area can adequately accommodate the forecast peak demand of six queued vehicles during the morning student drop-off operation.

Although traffic congestion is no longer trigger for impacts related to the CEQA assessment, based upon the TIA and queuing information as outlined above, impacts due to traffic congestion near the Project site have been determined to be less than significant.

- D-2 The Project site is currently a surface parking lot with approximately 60 parking spaces and only minor structures (i.e., a parking attendant booth and storage bins/sheds). The Project site is

2. Response to Comments

surrounded by fencing and most of the Project site is developed with an asphalt and concrete parking lot, with some dirt patches.

Schools located within a quarter-mile of the Project site include two elementary schools, and one private catholic school (K-8). However, the nearest middle schools to the Project site are John Liechty Middle School, Sal Castro Middle School, Alliance Richard Merkin Middle School, Berendo Middle School, which are located approximately between one mile and two miles from the Project site. Therefore, the Proposed project would provide educational opportunities for students in grades 6th through 8th, which are currently not provided in the existing area.

The applicant, Bright Star Schools, is not considering commercial uses as part of the proposed Project at this site. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang Middle School Project.

2. Response to Comments

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2. Response to Comments

COMMENT E – Taylor Spaur (1 page)

Email provided after the close of the public review period.

From: T. J. Spaur <[REDACTED]>
Sent: Friday, January 7, 2022 11:28 AM
To: California Environmental Quality Act Comments <CEQA-Comments@lausd.net>; Pico Union
<[REDACTED]>
Subject: Bright Star Charter Middle School

CAUTION: EXTERNAL EMAIL

Statement AGAINST proposed Bright Stars charter school.

On January 3, 2022 ten board members were present at our general board meeting. We voted unanimously to write in opposition to the proposed construction of a school at **1700 W. Olympic Blvd and Beacon.**

The Pico Union Neighborhood Council opposes the construction of this school because we feel it would negatively impact the residents of our district, especially those that live near Olympic, Union, 11th St., and Beacon. There is a charter school with 450 students at the corner of Beacon and 11th St. This school always jams up traffic on Union Avenue during drop-offs and pick-ups. Placing another school of about the same size ½ a block away would exacerbate the traffic congestion and negatively impact the health and safety of residents. Also, six schools already exist within 0.3 miles of the proposed location so it seems unnecessary to add another.

With respect,

Taylor Spaur
Pico Union Neighborhood Council: <[REDACTED]> (Taylor Spaur)

2. Response to Comments

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2. Response to Comments

E. Comment received from Taylor Spaur, submitted via Email January 7, 2022.

The District received one additional comment via email on January 7, 2022, which was 67 days after the close of the comment period. This comment is attached for reference.

2. Response to Comments

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