

October 2019 | **Response to Comments**
State Clearinghouse No. 2019059091

ELIZABETH LEARNING CENTER

Comprehensive Modernization

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: Will Meade, LEED AP, CEQA Project Manager



Prepared by:

PlaceWorks
3 MacArthur Place, Suite 1100
Santa Ana, California 92707

Table of Contents

Section	Page
1. INTRODUCTION.....	1-1
1.1 INTRODUCTION.....	1-1
1.2 PUBLIC ENGAGEMENT.....	1-1
1.3 DOCUMENT FORMAT.....	1-2
1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	1-2
2. RESPONSE TO COMMENTS.....	2-1

Table of Contents

This page intentionally left blank.

1. Introduction

1.1 INTRODUCTION

This document includes the public comments received on the Elizabeth Learning Center Mitigated Negative Declaration and supporting Initial Study (MND) along with the Lead Agency responses to those comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC], Division 13, Section 21000 et seq. [CEQA Statute] and the California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Section 15000 et seq. [CEQA Guidelines]), 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.

1.2 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration. Per CEQA Guidelines Section 15072 and 15073, the LAUSD determined that an MND would be required for this proposed Project and circulated a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and MND. The public review period for this CEQA document was from May 22, 2019 to June 21, 2019. Public outreach for the MND included distribution through the following methods:

Newspaper Publications

- NOI published in the legal announcement section of the Daily News (English language daily newspaper) on May 22, 2019.
- NOI published in the legal announcement section of La Opinión (Spanish language daily newspaper) on May 22, 2019.

U.S. Postal Mail

- NOI sent to parents or guardians of the Elizabeth Learning Center students – 1,822 parents/guardians
- NOI sent to addresses within 0.25 mile of project site – 485 owner/occupant mailings

Overnight and Certified Mail

- NOI sent to nine (9) local agencies and six (6) Native American Tribes
- NOI and MND sent to the South Coast Air Quality Management District

1. Introduction

- NOI and MND sent to the Office of Planning and Research, State Clearinghouse for distribution to fifteen (15) state agencies.

Public Posting

- NOI posted at the Elizabeth Learning Center campus

Document Availability

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

- LAUSD, Office of Environmental Health and Safety (OEHS), 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3417)
- Cudahy Library, 5218 Santa Ana Street, Cudahy, CA 90201
- Elizabeth Learning Center, Main Office, 4811 Elizabeth Street, Cudahy, CA 90201
- LAUSD Local District East Office, 2151 North Soto Street, Los Angeles, CA 90032
- LAUSD website at: <http://achieve.lausd.net/ceqa>

Community Outreach

A CEQA public meeting was held on May 28, 2019, at the Elizabeth Learning Center at 6:00 PM. The meeting provided agencies and the public an opportunity to comment on the proposed Project and the MND.

1.3 DOCUMENT FORMAT

This document is organized as follows:

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

Section 2, *Response to Comments*. This section provides a list of agencies, organizations and interested persons that commented on the MND, comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered for each letter, and the letter is followed by responses with references 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 findings that the project will not have a significant effect on the environment. If the commenter believes that the project

1. Introduction

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. 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

This page intentionally left blank.

2. Response to Comments

This section has the written comments received on the circulated MND and LAUSD OEHS' response to each comment. No comments were received during the CEQA public meeting.

Comment Reference	Commenting Person / Agency	Date of Comment	Page Number
A	Gabrieleno Band of Mission Indians-Kizh Nation	05/29/19	2-3
B	Department of Toxic Substances Control	06/10/19	2-7
C	County Sanitation District of Los Angeles County	06/18/19	2-11
D	South Coast Air Quality Management District	06/19/19	2-15
E	California Department of Transportation	06/25/19	2-21

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER A – Gabrieleno Band of Mission Indians-Kizh Nation (1 page)

Letter A



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

Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration

May 29, 2019

City of Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Good Afternoon William Meade,

We have received your Notice of Intent to adopt a Negative Declaration for the Elizabeth Learning Center at 4811 Elizabeth Street Project in the location of the Los Angeles county. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

A-1

Sincerely,
Gabrieleno Band of Mission Indians/Kizh Nation
(1844) 390-0787 Office

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

A. **Response to Comments from the Gabrieleno Band of Mission Indians-Kizh Nation, dated May 29, 2019.**

A-1 The comment letter has a single comment: the Gabrieleno Band of Mission Indians-Kizh Nation's Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

The comment is not directed toward the project-related environmental impacts or the content or adequacy of the CEQA Negative Declaration.

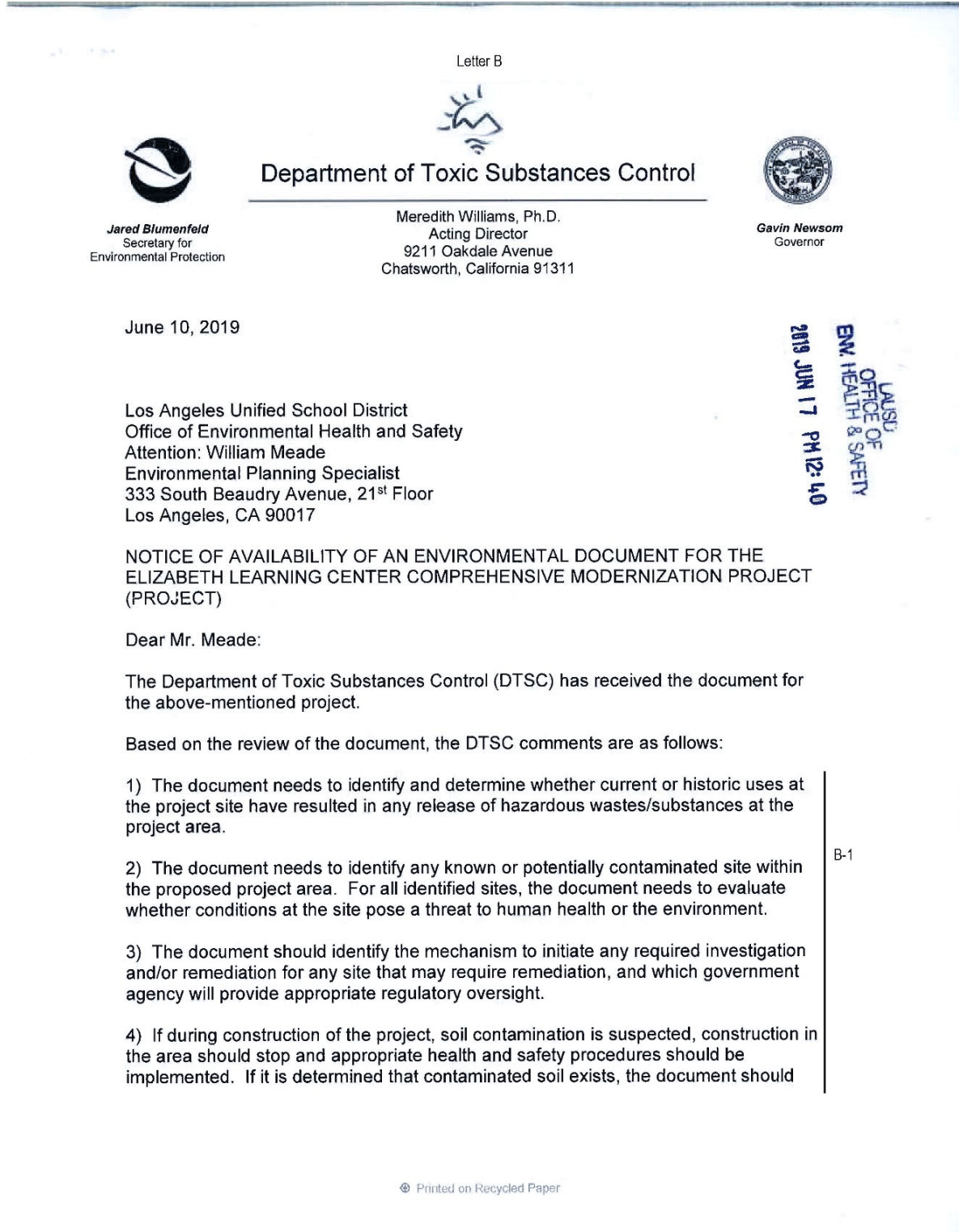
As discussed in Chapter 4, Section XIX Tribal Cultural Resources, page 127, of the Initial Study the Gabrieleño Band of Mission Indians–Kizh Nation requested notification and consultation through the PRC Section 21080.3.1 process with LAUSD. LAUSD OEHS staff and the Gabrieleño Band of Mission Indians–Kizh Nation completed consultation regarding this Project with two meetings in early 2019. The result of the consultation was to require standard conditions of approval SC-TCR-1 and SC-TCR-2 to protect potential unanticipated discoveries associated with Tribal Cultural Resources. These conditions were included in the Initial Study and are incorporated into the Project.

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER B – Department of Toxic Substances Control (2 pages)



Letter B



Jared Blumenfeld
Secretary for
Environmental Protection

Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

June 10, 2019

Los Angeles Unified School District
Office of Environmental Health and Safety
Attention: William Meade
Environmental Planning Specialist
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

LAUSD
OFFICE OF
ENV. HEALTH & SAFETY
2019 JUN 17 PM 12:40

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL DOCUMENT FOR THE ELIZABETH LEARNING CENTER COMPREHENSIVE MODERNIZATION PROJECT (PROJECT)

Dear Mr. Meade:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should

B-1

2. Response to Comments

Mr. William Meade
June 10, 2019
Page 2

identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

B-1
Cont'd

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,



Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

2. Response to Comments

B. Response to Comments from the Department of Toxic Substances Control, dated June 10, 2019.

B-1 DTSC's comments about current and historic contamination on site and vicinity are addressed in the Phase I Environmental Site Assessment for the proposed Project. The assessment revealed no evidence of Recognized Environmental Conditions (RECs), Controlled RECs, Historical RECs, or vapor encroachment conditions in connection with the property. The Phase I ESA is attached as Appendix E of the Initial Study and is posted on LAUSD OEHS's website <https://achieve.lausd.net/ceqa>. Soil sampling and testing is underway as part of Preliminary Environmental Assessment-Equivalent process. If warranted, contaminated soil will be removed in accordance with LAUSD established Specifications and adopted Standard Conditions of Approval (SC) for soil hazards. SC-HAZ-4 requires the following:

The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements:

- District Specification Section 01 4524, Environmental Import / Export Materials Testing.
- Removal Action Workplan.
- South Coast Air Quality Management District (SCAQMD) Rule 1466.
- Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979.
- Lead and asbestos abatement requirements identified by the LAUSD Facilities Environmental Technical Unit (FETU) in Phase I, Phase II, or abatement plan(s).


2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER C – County Sanitation Districts of Los Angeles (2 pages)

Letter C



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

June 18, 2019
Ref. DOC 5161960

Mr. William Meade
Environmental Planning Specialist
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Dear Mr. Meade:

**NOI Response to
the Elizabeth Learning Center Comprehensive Modernization**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) for the subject project on May 22, 2019. The proposed project is located within the jurisdictional boundaries of District No. 1. We offer the following comments regarding sewerage service:

1. The additional wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Wright Road Trunk Sewer, located in Atlantic Avenue at Cecilia Street. The Districts' 26.4-inch diameter lined trunk sewer has a capacity of 9.5 million gallons per day (mgd) and conveyed a peak flow of 5.1 mgd when last measured in 2013.
2. The additional wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently processes an average flow of 261.1 mgd.
3. The expected increase in average wastewater flow from the project, described in the document as a net increase of 26,384 square feet to the existing school campus, is 5,277 gallons per day, after all structures on the project site scheduled to be demolished are demolished. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. In determining the impact to the Sewerage System and if connection fees are applicable, the Districts' will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel(s) or facilities on the parcel(s) in the development. For more

LAUSD
OFFICE OF
ENV. HEALTH & SAFETY
2019 JUN 21 AM 11:06

C-1

DOC 5191929.D01

2. Response to Comments

Mr. William Meade

-2-

June 18, 2019

information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, and click on Connection Fee, Service Charge and More. For more specific information regarding the connection fee application procedure and if fees are applicable to your specific project, the developer should contact the Districts' Wastewater Fee Public Counter at (562) 908-4288, extension 2727. If a connection fee is applicable, payment will be required before this project is permitted to discharge to the Districts' Sewerage System. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project.

C-1
Cont'd

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

DOC 5191929.D01

2. Response to Comments

C. **Response to Comments from the County Sanitation Districts of Los Angeles, dated June 18, 2019.**

C-1 The comment letter provides information on sewerage service for the Elizabeth Learning Center. Specific comments are in relation to conveyance facilities and capacity; treatment plant capacity and flow; general Sanitation Districts information; wastewater treatment facility and connection fee information for new developments; and regional growth forecast to determine wastewater treatment capacity.

Specific comments are not directed toward the project-related environmental impacts or the content or adequacy of the CEQA Mitigated Negative Declaration (MND).

The Elizabeth Learning Center is in the City of Cudahy. As discussed in Chapter 4 of the Initial study, the Project would improve facilities on an existing school campus; it does not consist of a new residential or commercial land use development that would require new sewer connections. The Campus is completely developed and is currently generating wastewater. The school modernization would serve existing and future students living in the region and would not increase the student population, staff, or utility demands. The Project would not require the relocation or construction of new wastewater treatment facilities and would not increase the strength or quantity of wastewater currently being discharged from the Campus. Based on the analysis in the Initial Study the proposed Project would not affect Los Angeles County Sanitation District's facilities and services.

2. Response to Comments

This page intentionally left blank.

2. Response to Comments

LETTER D – South Coast Air Quality Management District (4 pages)

Letter D



SENT VIA E-MAIL AND USPS:

June 19, 2019

CEQA-comments@lausd.net

William Meade, Environmental Planning Specialist
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

Mitigated Negative Declaration (MND) for the Proposed Elizabeth Learning Center Comprehensive Modernization Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to modernize the existing Elizabeth Learning Center, including the demolition of three existing academic buildings totaling 33,722 square feet, the removal of 22 portable structures totaling 29,794 square feet, the construction of approximately 86,900 square feet of academic buildings, and the retrofitting of the existing Administrative Building on 16.8 acres (Proposed Project). The Proposed Project is located at 4811 Elizabeth Street on the northeast corner of Elizabeth Street and Atlantic Avenue in the City of Cudahy. Upon review of Figure 3 in the MND and aerial photographs, South Coast AQMD staff found that residential uses and two city parks are adjacent to the Proposed Project¹. Construction is anticipated to begin in July 2021 and would be completed in July 2025². In order to allow the school to remain in operation during construction, 15 relocatable buildings will be added on campus³.

South Coast AQMD Staff's Summary of Air Quality Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant after the implementation of "the Exhaust Emissions and Fugitive Dust measures under" Standard Conditions of Approval for Air Quality (SC-AQ) 4⁴ from the Los Angeles Unified School District's (LAUSD) School Upgrade Plan (SUP), which is a programmatic EIR that guides the modernization of certain LAUSD schools, such as the Proposed Project. SC-AQ-4 requires projects to use construction equipment that meets or exceeds Tier 3 emissions standards, or Tier 4 emissions standards for engines between 50 and 750 horsepower⁵.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the proposed standard conditions of approval that reduce localized PM_{2.5} emissions to a less than significant level. While the Lead Agency included a discussion

D-1

¹ MND, Section 2 Environmental Setting, 2.2 *Surrounding Land Uses*, Page 9.

² *Ibid.*, Section 3 Project Description, 3.2 *Construction Phasing*, Page 33.

³ *Ibid.*, 3.2.2 *Interim Student Housing*, Page 32.

⁴ *Ibid.*, Section 4 Environmental Checklist and Analysis, Page 52.

⁵ *Ibid.*, Page 45.

2. Response to Comments

William Meade

June 19, 2019

of SC-AQ-4, South Coast AQMD staff found that the Lead Agency did not commit to SC-AQ-4, as it's written in the LAUSD SUP. Rather, the Lead Agency stated that "the construction contractor shall use Level 2 diesel particulate filters [(DPF)] on off-road construction equipment of 50 horsepower or more during the Phase 1 of construction⁶." As mentioned above, SC-AQ-4 requires the use of construction equipment that meets or exceeds Tier 3 emissions standards, or Tier 4 emission standards for engines between 50 and 750 horsepower⁷. Therefore, to go beyond the requirements set forth in SC-AQ-4, South Coast AQMD staff recommends that the Lead Agency require the use of Tier 4 construction equipment for engines greater than 50 horsepower in the Final MND, rather than only requiring a level 2 DPF. This recommendation will also further reduce the Proposed Project's localized PM2.5 emissions on sensitive receptors (e.g., students and teachers) on campus and those who live adjacent to the Proposed Project during construction since the Proposed Project's localized construction PM2.5 emissions were found to be 4.62 pounds per day (lbs/day), which is slightly below South Coast AQMD's Localized Significance Threshold of 5.50 lbs/day. Please see the attachment for additional information.

D-1
Cont'd

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:RD
[LAC190521-08](#)
Control Number

⁶ *Ibid.*

⁷ *Ibid.* Page 45.

2. Response to Comments

William Meade

June 19, 2019

ATTACHMENT

Air Quality Mitigation Measures or Project Requirement

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse air quality impacts. To go beyond the requirements set forth in SC-AQ-4, and to further reduce the Proposed Project's localized construction emissions from PM_{2.5}, South Coast AQMD staff recommends that the Lead Agency incorporate the following conditions for the Proposed Project as air quality mitigation measures or project requirements in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website⁸.

D-1
Cont'd

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

- Require the use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁹. A list of CARB verified DPFs are available on the CARB website¹⁰.
- To ensure that Tier 4 construction equipment or better will be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.
- In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

South Coast AQMD "SOON" Funds

- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available

⁸ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁹ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹⁰ *Ibid*. Page 18.

2. Response to Comments

William Meade

June 19, 2019

low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>

D-1
Cont'd

2. Response to Comments

D. Response to Comments from the South Coast Air Quality Management District, dated June 19, 2019.

D-1 The first two paragraphs are a review of the Project description, and a summary of the air quality analysis, and no response is needed.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the Board of Education (BOE) on February 5, 2019 (Board Report Number 241-18/19). The SCs were updated to incorporate and reflect changes in the laws, regulations, and the District's standard policies, practices and specifications.

As identified on page 44 of the Initial Study, applicable SCs related to air quality impacts associated with the proposed Project are shown in the table. Implementation of these SCs are required as part of the Project.

SC-AQ-4 requires preparation of an air quality assessment. If impacts are identified, then specific air emission reduction measures shall be implemented, which includes all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.

Because the analysis identified potentially significant regional construction air quality impacts during Phase 1 of construction, implementation of exhaust emissions and fugitive dust measures under SC-AQ-4 are required.

As part of the SC-AQ-4 requirements, to reduce atmospheric particulate matter that have a diameter less than 2.5 micrometers ($PM_{2.5}$) the construction contractor shall also be required to use Level 2 DPF on off-road construction equipment of 50 horsepower or more during the Phase 1 of construction. As shown in Table 4 of the Initial Study, implementation of only the Level 2 DPFs would reduce localized emissions from Phase 1 site preparation activities to below the screening-level $PM_{2.5}$ LST. Implementation of the other exhaust emissions measures (including Tier 3 or 4) and fugitive dust reduction measures listed under SC-AQ-4 would provide further reductions in construction-related criteria air pollutant emissions and result in overall lower emissions than what is shown in Table 4. Therefore, no additional measures are required to reduce emissions and impacts would be less than significant.

The attachment to the comment letter provides information on Tier 4 construction equipment, Level 3 DPF and funding for low-emission heavy-duty engines.

2. Response to Comments

This page intentionally left blank.


2. Response to Comments

LETTER E – California Department of Transportation (2 pages)

Letter E

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov


Making Conservation
a California Way of Life.

2019 JUN 28 PM 12:46
LAUSD
OFFICE OF
ENV. HEALTH & SAFETY

June 20, 2019

William Meade
Environmental Planning Specialist
Office of Environmental Safety
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90071

RE: Elizabeth Learning Center
Comprehensive Modernization
Mitigated Negative Declaration (MND)
SCH# 2019059091
GTS# 07-LA-2019-02504
Vic. LA-710/ PM 19.244

Dear Mr. Meade:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of the demolition of three permanent buildings (33,722 square feet: Buildings A, B, and East Classroom Building 3); the removal of 22 portable buildings (26,794 square feet); construction of one or more permanent buildings (~86,900 square feet)(1 to 2-story) providing secondary school classrooms and support facilities, elementary classrooms and support facilities, kindergarten classrooms and support facilities , and a library; seismic retrofit and modernization of the Administrative Building; various improvements to other remaining buildings; site upgrades to infrastructure and utilities, landscape and hardscaping, site lighting, fencing, and gates; and improvements to meet the programmatic access requirements of the Americans with Disabilities Act.

As Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to "provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability." After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

The nearest State facility to the proposed project is Interstate 710 (I-710). I-710 currently experiences extended peak hours with limited traffic flows. Though it is stated that some work will be done during instructional breaks, when students are off the Campus, and hauling would not start until 7:00am while avoiding peak commute times, the project will include construction and/or hauling during school days. Therefore, during construction,

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

E-1

2. Response to Comments

Mr. Meade
June 20, 2019
Page 2

the hauling/equipment trucks must be operated strategically and use alternative routes to keep the freeway operation system working effectively.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing. These suggestions can reduce pedestrian and bicyclist exposure to vehicles ensuring safety by lessening the time that the user is in the likely path of a motor vehicle.

E-2

Pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and other signage and striping should be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Formal information from traffic control devices should be reinforced by informal sources of information such as lane widths, landscaping, street furniture, and other road design features.

We look forward to your cooperation and reviewing any proceeding documents related to this project. If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov and refer to GTS# 07-LA-2019-02504.

Sincerely,



MIYA EDMONSON
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

E. Response to Comments from the California Department of Transportation, dated June 20, 2019.

E-1 The comment letter provides a summary of the project description, the Caltrans mission statement, information on the nearest State facility to the school, the requirement for a transportation permit for oversized-transport vehicles on State highways, and vehicle speed reduction methods.

LAUSD will comply with permit requirements for State highways. Based on the analysis in the Initial Study the proposed Project would not affect the Caltrans facilities or services.

2. Response to Comments

This page intentionally left blank.