

April 2018 | Final Environmental Impact Report

State Clearinghouse No. 2017111008

SHERMAN OAKS CENTER FOR ENRICHED STUDIES COMPREHENSIVE MODERNIZATION

Los Angeles Unified School District

Prepared for:

Los Angeles Unified School District

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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) Sherman Oaks Center for Enriched Studies (SOCES) Comprehensive Modernization Project during the public review period, from February 26, 2018, to April 12, 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 together form 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 contents 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.

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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 responses to all written comments received on the Draft EIR during the public review period (February 26, 2018, to April 12, 2018), as well as a letter received from the Los Angeles County Metropolitan Transportation Authority on April 19, 2018.

To facilitate review of the responses, each comment letter has been reproduced and assigned a letter (A through D). Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number. Where sections of the Draft EIR are excerpted in this document, the sections are shown indented. Changes to the Draft EIR text, if any, are shown in underlined text for additions and strikeout for deletions. All of the comments provided will be included as part of the administrative record and considered by the Board of Education prior to a final decision on the proposed Project.

The following is a list of individuals and agencies that submitted comments on the Draft EIR during the public review period.

Number Reference	Commenting Person/Agency	Comment Letter Date / District Receipt Date 2017	Page No.	
Individuals and A	Individuals and Agencies			
Α	Jeffrey Mausner	March 20, 2018	2-3	
В	Lisette Lazaveno	March 20, 2018	2-14	
С	Carmen Segura	March 20, 2018	2-18	
D	Candace Rumenopp	March 14, 2018	2-22	
E	LA County Metropolitan Transportation Authority	April 19, 2018	2-26	

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Comment A – Jeffrey Mausner (2 pages)

March 20, 2018 meeting regarding SOCES (Sherman Oaks Center for Enriched Studies) EIR (Environmental Impact Report).

Good evening. I'm Jeffrey Mausner. I'm a Board Member and the 2nd Vice President of the Tarzana Neighborhood Council. I'm speaking on behalf of myself and on behalf of the neighbors I've spoken with on this. Because of the short notice given of the EIR and this meeting, there was not an opportunity for the Tarzana Neighborhood Council to consider weighing in on this matter. And apparently, LAUSD doesn't present matters like this to the affected Neighborhood Councils at their regular board meetings.

A-1

I live on Amigo Avenue, about 50 yards from SOCES. (In the transcript of the last meeting, my statement was transcribed as coming from Jeff Bannister, living on Nico [Street]. To clarify the record, it's Jeff Mausner on Amigo Ave.)

A-2

In the Draft EIR, Section 1.4, Statement of Objectives, there is nothing regarding minimizing disruption to the people who live around the school site. Objective #7 is: "Limit the disruption of the educational experience of students during construction of the Project by limiting the number and/or duration of phases."

A-3

There is no similar provision for the neighboring residents. In fact, there is little in the Draft EIR indicating that the neighboring residents will be protected from noise, vibration, dust, pollution, and traffic during construction. The document does not even correctly state the residential neighborhood where the school is located – it says Reseda. The school is actually located in Tarzana. It doesn't appear that the authors of the EIR cared much about the surrounding residents, if they don't even know where the school is located.

A-4

On pages 109 and 114 of the Appendix, there is a short discussion of the distance of the neighbors from the school:

"The nearest sensitive receptors are the apartments to the east approximately 550 feet from the center of the construction activities; single-family residences to the north across Victory Boulevard at 570 feet; single-family residences to the west across Yolanda Avenue at approximately 650 feet; and single-family residences to the south across Erwin Street at approximately 525 feet."

A-5

Based upon those distances, it is determined in the draft EIR that the noise and vibration that will be experienced by the neighbors (the sensitive receptors) will not be significant.

1

However, those distances are measured from "the center of the construction activities." What is that, the center of the campus? It does not appear that the distance of the neighbors to the actual construction, which will take place on the periphery of the campus, was considered. Those actual distances from the neighbors to the actual construction have to be measured, and steps have to be taken to decrease noise, vibration, dust, and pollution which will actually be experienced by the neighbors.

A-5 cont'd

There should also be a specific Objective added to the EIR, Objective #8, which states: Limit the disruption of noise, vibration, dust, pollution, and traffic to the neighboring residents during Project construction. This should include, but not be limited to:

- a. Having a contact telephone number or telephone numbers, which will be answered 24 hours a day, with specific people designated as the responsible parties for answering the phone, fo complaints regarding noise, vibration, dust, pollution, traffic, and other matters regarding the construction.
- b. Extensive use of noise barriers and curtains to reduce construction noise.
- c. Strict compliance with the following prohibited hours for construction: not before 7 AM and not after 9 PM on weekdays, and not after 7 PM on weekdays for performing noisy work; not before 9 AM and not after 6 PM on Saturdays; not at all on Sundays.

I'm especially concerned about noise, vibration, and dust around where the Transportation Building will be torn down and the new Gymnasium will be built (Yolanda and Victory), around the Auditorium (Yolanda and Erwin), across from the Administrative and Counseling Buildings (Erwin Street), and the apartments to the east of the campus, where demolition will take place and new buildings will be constructed within a few yards of those residences. We want to see specific provisions in the Final EIR addressing the **true distance between the neighbors and the actual construction**, and how noise, vibration, dust, pollution, and traffic will be minimized for the neighbors.

Jeffrey Mausner

(For Identification Purposes)

Board of Directors and 2nd Vice President, Tarzana Neighborhood Council Chairman, Tarzana Neighborhood Council Animal Welfare Committee Neighborhood Council Liaison to Los Angeles Animal Services Department Volunteer, West Valley Animal Shelter

Email: Jeff@MausnerLaw.com; J.Mausner@TarzanaNC.org

Cell phone: (310) 617-8100

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A-6

A. Response to Comments from Jeffrey Mausner, dated March 20, 2018.

- A-1 Public notice for the Draft EIR community meeting that was held on March 20, 2018 was mailed on February 23, 2018, three weeks before the community meeting. Notices for the community meeting were also emailed to individuals, agencies, and interested parties who provided contact information during the November 8, 2017 scoping meeting for the Project and notices were distributed by hand and posted on-line at https://achieve.lausd.net/ceqa. The public review period was 45 days, from February 26, 2018, to April 12, 2018. This comment letter was received three weeks prior to the end of the public review period on April 12, 2018. No additional comments on the Project were received from the Tarzana Neighborhood Council during the remainder of the public review period.
- A-2 As part of the Final EIR, page 56 of the scoping meeting transcript has been revised to reflect the correct name and street. Text has been revised as follows:
 - AUDIENCE: Hi, I'm Jeff <u>Bannister Mausner</u>. I live over on <u>Nico Amigo</u>. I am the second vice president of the Tarzana neighborhood council.
- A-3 Construction activity impacts on the surrounding neighborhood, including noise, vibration, dust, pollution, and traffic were analyzed in the Initial Study (Appendix A of the Draft EIR). Noise and vibration were analyzed in Chapter 4, Item XII, Noise; dust and pollution were analyzed under Item III, Air Quality; and traffic was analyzed under Item XVII, Transportation and Traffic. Measures to reduce impacts on the surrounding neighborhoods include LAUSD Standard Conditions of Approval listed in each Initial Study Chapter and included in the Draft EIR as Appendix E. LAUSD Standard Conditions of Approval are uniformly applied development standards and were adopted by the LAUSD BOE in November 2015. The Standard Conditions of Approval were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs as well as typically applied mitigation measures. Adopted Standard Conditions of Approval commit the District to compliance tracking and follow-up on this Project.

Air Quality. The following LAUSD Standard Conditions of Approval, as applicable related to air quality apply to the proposed Project:

- SC-AQ-2 LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
- SC-AQ-3 LAUSD's construction contractor shall:
 - Maintain slow speeds with all vehicles.
 - Load impacted soil directly into transportation trucks to minimize soil handling.

- Water/mist soil as it is being excavated and loaded onto the transportation trucks.
- Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site.
- Minimize soil drop height into transportation trucks or stockpiles during dumping.
- During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks.
- Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed.
- Place stockpiled soil on polyethylene sheeting and cover with similar material.
- Place stockpiled soil in areas shielded from prevailing winds.

SC-AQ-4 LAUSD shall prepare an air quality assessment.

If site-specific review of a school construction Project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.

LAUSD shall mandate that construction bid contracts include the measures identified in the air quality assessment. Measures shall reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. Specific air emission reduction measures include, but are not limited to, the following:

Exhaust Emissions

- Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).
- Consolidate truck deliveries and/or limit the number of haul trips per day.
- Route construction trucks off congested streets.
- Employ high pressure fuel injection systems or engine timing retardation.
- Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.
- Use construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4

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(model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.

- Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.
- Utilize electrical power rather than internal combustion engine power generators as soon as feasible during construction.
- Utilize electric or alternatively fueled equipment, if feasible.
- Utilize construction equipment with the minimum practical engine size.
- Utilize low-emission on-road construction fleet vehicles.
- Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.

Fugitive Dust

- Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible.
- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.
- Pave construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles.
- Pave all construction access roads for at least 100 feet from the main road to the Project site.
- Water the disturbed areas of the active construction site at least three times per day, except during periods of rainfall.
- Enclose, cover, water twice daily, or apply non-toxic soil binders according
 to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and
 sand) with a five percent or greater silt content.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph).
- Apply water at least three times daily, except during periods of rainfall, to all unpaved road surfaces.
- Limit traffic speeds on unpaved roads to 15 mph or less.

- Prohibit high emission causing fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD.
- Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials.
- Limit the amount of daily soil and/or demolition debris loaded and hauled per day.

General Construction

- Utilize ultra-low VOC or zero-VOC surface coatings.
- Phase construction activities to minimize maximum daily emissions.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person).
- Develop a trip reduction plan for construction employees.
- Implement a shuttle service to and from retail services and food establishments during lunch hours.
- Increase distance between emission sources to reduce near-field emission impacts.
- Require construction contractors to document compliance with the identified mitigation measures.

Additionally, several elements of SCAQMD Rule 403, such as protocols for mitigation of potential fugitive dust emissions, have been incorporated into the Project. Access to the site will be controlled, and excavation will not be conducted during times of high wind conditions.

Noise and Vibration. The following LAUSD Standard Conditions of Approval related to noise and vibration apply to the proposed Project:

- SC-AQ-2 LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive noise is not generated by unmaintained equipment.
- SC-N-5 LAUSD Facilities Division or its construction contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the construction contractor shall continue on

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an as-needed basis throughout the construction phase of the Project to reduce school and other noise sensitive land use disruptions.

- SC-N-6 The LAUSD shall require the construction contractor to minimize blasting for all construction and demolition activities, where feasible. If demolition is necessary adjacent to residential uses or fragile structures, the LAUSD shall require the construction contractor to avoid using impact tools. Alternatives that shall be considered include mechanical methods using hydraulic crushers or deconstruction techniques.
- SC-N-8 LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the construction contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.
 - Prior to construction activities, the construction contractor shall inspect
 and report on the current foundation and structural condition of the
 historic building.
 - The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building.
 - The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building.
 - During demolition the construction contractor shall not phase any
 ground-impacting operations near a historic building to occur at the same
 time as any ground impacting operation associated with demolition and
 construction of a new building.
 - During demolition and construction, if any vibration levels cause cosmetic
 or structural damage to a historic building the District shall issue "stopwork" orders to the construction contractor immediately to prevent
 further damage. Work shall not restart until the building is stabilized
 and/or preventive measures to relieve further damage to the building are
 implemented.
- SC-N-9 LAUSD shall prepare a noise assessment.

If site-specific review of a school construction Project identifies potentially significant adverse construction noise impacts, then LAUSD shall implement all feasible measures to reduce below applicable noise ordinances. If exterior construction noise levels exceed local noise standards, policies, or ordinances

at noise-sensitive receptors, LAUSD shall mandate that construction bid contracts include the measures identified in the noise assessment. Specific noise reduction measures include, but are not limited to, the following:

Source Controls

- Time Constraints prohibiting work during sensitive nighttime hours
- Scheduling performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM)
- Equipment Restrictions restricting the type of equipment used
- Noise Restrictions specifying stringent noise limits
- Substitute Methods using quieter methods and/or equipment
- Exhaust Mufflers ensuring equipment have quality mufflers installed
- Lubrication & Maintenance well maintained equipment is quieter
- Reduced Power Operation use only necessary size and power
- Limit Equipment On-Site only have necessary equipment on-site
- Noise Compliance Monitoring technician on site to ensure compliance
- Quieter Backup Alarms manually-adjustable or ambient sensitive types

Path Controls

- Noise Barriers semi-permanent or portable wooden or concrete barriers
- Noise Curtains flexible intervening curtain systems hung from supports
- Enclosures encasing localized and stationary noise sources
- Increased Distance perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment

Receptor Controls

- Window Treatments reinforcing the building's noise reduction ability
- Community Participation open dialog to involve affected residents
- Noise Complaint Process ability to log and respond to noise complaints.
 Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the Project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the contractor and the District. In the event of noise complaints LAUSD shall monitor noise

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from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.

Temporary Relocation – in extreme, otherwise immitigable cases.
 Temporarily move residents or students to facilities away from the construction activity.

Traffic. The following LAUSD Standard Conditions of Approval related to traffic apply to the proposed Project:

SC-T-4 LAUSD shall require its contractors to submit a construction worksite traffic control plan to the local City or County jurisdiction for review prior to construction. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. LAUSD shall encourage its contractor to limit construction-related trucks to off-peak commute periods. As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

With implementation of these conditions neighborhood impacts would be less than significant.

- A-4 Although the Sherman Oaks Center for Enriched Studies is physically located in Tarzana, the EIR used the correct post office address for the high school based on the 91335 zip code (Reseda north of Oxnard Street). The community of Tarzana is identified as south of Victory Boulevard not Oxnard Street. The Tarzana zip code is 91356 and covers the area south of Oxnard Street. Unfortunately, the U.S. Postal Service has not updated its zip codes.
- A-5 The noise and vibration analysis in the Initial Study (Appendix A of the Draft EIR) was calculated in terms of average noise levels in accordance with current industry standards. The analysis is based on the fact that construction equipment moves around the site and would be located at all points of the site for about the same amount of time. Construction equipment would operate at the site boundary nearest to any given sensitive receptor for the same amount of time that such equipment would operate at a point furthest from the same sensitive receptor. Though construction noise would, at times, be louder when closer to receptors (and quieter when further away or buffered) than the average noise levels in the noise analysis, a spatially averaged point on the construction site (i.e., the center of the construction site) represents the noise level averaged over the entire construction period.

As stated in Chapter 4, Item XII, Noise (in Appendix A), the distances provided are from the center of the construction activities which is consistent with the noise analysis that was completed for the proposed Project. As further discussed in Chapter 4, Item XII, Noise, there may be short periods on any given day when a noisy piece of equipment could be near the campus boundary and cases where noise levels at nearby receptors may intermittently and temporarily exceed the noise ordinance's limit of 75 dBA. In such instances, as noted in

Chapter 4, Item XII, Noise, the District's construction activities would be consistent with Section 41.40 of the Los Angeles Municipal Code and incorporate all technically feasible noise Standard Conditions of Approval (including but not limited to SC-N-5,-6, -8-9, as applicable) to attempt to reduce noise impacts to the maximum extent feasible.

A-6 See response to A-3. By limiting the disruption of the educational experience for on-site sensitive receptors (i.e., students who may be within less than 100 feet of new construction; per Objective #7 for the proposed Project), the District will ensure that impacts to off-site receptors are also limited. Further, Construction activity impacts on the surrounding neighborhood, including noise, vibration, dust, pollution and traffic were analyzed in the Initial Study (Appendix A of the Draft EIR). Noise and vibration were analyzed in Chapter 4, Item XII, Noise; dust and pollution were analyzed under Item III, Air Quality; and traffic was analyzed under Item XVII, Transportation and Traffic. The conditions identified in the comment are covered under the LAUSD Standard Conditions of Approval, specifically in SC-N-9.

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Comment B – Lisette Lazaveno (1 page)

	COMMENT CARD / TARJETA DE COMENTARIO Public Meeting / Reunión Pública
Sherman Oaks	Center for Enriched Studies High School Comprehensive Modernization Project niegral de la Escuala Preparatoria de Sherman Oaks Center for Enriched Studies
Project / Proyecto:	SOCES
Date / Fecha:	3.50-18
Name / Nombre:	Liselfe Lazaneno / HUDBepafamasbralobal, net
Affiliation / Afiliació	n:
Address / Dirección:	
Comments / Comen	arios:
I have	a son who has asthma, During custouchan
if I no	his asthma is getting worst one to
dust iss	us who should I contact?

Written comments must be received no later than April 12, 2018 at the following address:

Envia su commentaios antes de 12 de Abril 2018 a la siquient dirección:

LAUSD Office of Environmental Health and Safety

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: Eimon Smith

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B. Response to Comments from Lisette Lazaveno, dated March 20, 2018.

B-1 All construction related questions and concerns should be addressed to Teresa Akins, Community Relations, at teresa.akins@lausd.net; the main LAUSD phone line, (213) 241-1340; or her direct line, (213) 241-1326. Additionally, in compliance with LAUSD Standard Condition of Approval SC-N-9, advance notice of the start of construction shall be delivered to all sensitive receptors adjacent to the Project area. The notice will state specifically where and when construction activities will occur and provide contact information for filing complaints with the contractor and the District.

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LETTER C – Carmen Segura (1 page)

Public Meeting / Reunión Pública
Sherman Oaks Center for Enriched Studies High School Comprehensive Modernization Project Modernización Integral de la Escuala Preparatoria de Sherman Oaks Center for Enriched Studies
Project / Proyecto:
Date / Fecha: 3-20-18
Name/Nombre: Carnen Sigva.
Affiliation / Afiliación:
Address / Dirección: 49830 Vose St Reseda.
Address/Dirección: 49830 Jose St Reseda. Comments/Comentarios: S Gread, Nice Comments/Comentarios: S Gread, Nice
es un predietto Bueno.
Is great, nice. This is a good project.
Written comments must be received no later than April 12, 2018 at the following address: Envia su commentaios antes de 12 de Abril 2018 a la siquient dirección: LAUSD Office of Environmental Health and Safety 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 Attn: Eimon Smith

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- C. Response to Comments from Carmen Segura, dated March 20, 2018.
 - C-1 Comment noted.

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LETTER D – Candace Rumenopp (1 page)

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RE Sherman Dats Contr for torridonito Sturbes The Bang 14, 2018	
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Picking (on CAMPUS) closer To Victing that does not use Delano/Amigo Deland Amigo Deland Amigo Deland Accept to herewishes of trombleff behind by students	D-3
PA Systen is loud enough to see the learn on Calvert Better angual to sono only to the Computer to the Compu	D-4
Enough Parking for night School Drivers on comprise with permitter	D-5
Oil work To be 1864 Calvert St Dove in a very quick Tarzana Ca 91335 6810 Tirrely Freshion (Candace Rumerupp	D-6

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D. Response to Comments from Candace Rumenopp, dated March 14, 2018.

- D-1 Truck routes are determined by the City of Los Angeles. The LAUSD must obtain a haul route permit from the City of Los Angeles, Department of Building and Safety (LADBS). However, Reseda Boulevard and Victory Boulevard would be the primary access and haul routes during construction, not the neighborhood streets. During construction, concerns regarding the haul routes should be addressed to Teresa Akins, Community Relations, at teresa.akins@lausd.net; the main LAUSD phone line, (213) 241-1340; or her direct line, (213) 241-1326.
- D-2 Local roads are expected to fare well under standard truck travel during construction. The District requires contractors to repair damage resulting from their construction activities; this includes damage to local roads. Construction activity impacts on the surrounding neighborhood, including noise, were analyzed in the Initial Study (Appendix A of the Draft EIR). See response to Comment A-3 for more details. LAUSD has prepared a Preliminary Environmental Assessment that analyzed any contamination on the site, and a Removal Action Workplan that outlined the removal and disposal of the contaminated materials. Additionally, the South Coast Air Quality Management District has three rules that address excavation (Rules 1150, 1166, and 1466) and one that addresses fugitive dust (Rule 403). Additionally, any soil that is imported or exported must be chemically tested in accordance with specific written procedures outlined in LAUSD Specifications, Section 01 4524, "Environmental Import/Export Materials Testing." These measures specify the requirements for the excavation, sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. LAUSD will comply with Standard Conditions of Approval and regional air quality regulations.
- D-3 The main entrance to the campus is along Erwin Street. Student drop-off and pick-up takes place along two streets: Erwin Street and Yolanda Avenue. The proposed Project does not include changes to the existing main entrance and student drop-off/pick-up zones. As part of the Project, additional parking would be provided to accommodate the existing campus needs, which should reduce the amount of parking on the surrounding streets.
- D-4 Changes to the PA system are not part of the current Project. However, through inclusion in this Final EIR, this comment is 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.
- D-5 The school has three on-campus parking lots: Student and Staff Parking Lot #3 in the northwest part of campus with access from Yolanda Street; Staff Parking Lot #2 in the southeast corner of the school, with two access driveways from Erwin Street; and Staff Parking Lot #1 on the south side of the school adjacent to Building H, with access from Erwin Street. As part of the Project, 46 parking spaces would be added to the existing 164 spaces. A total of 210 spaces would be provided on campus.

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D-6 Demolition, construction, and modernization activities associated with the proposed Project are expected to take approximately 55 months. Because the Project site is an active school campus, less than five acres (contiguous) in each location on campus would be disturbed at any one time.

LETTER E – LA County Metropolitan Transportation Authority (4 pages)



Los Angeles County Metropolitan Transportation Authority One Gateway Plaza Los Angeles, CA 90012-2952 213.922.2000 Tel metro.net

April 19, 2018

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

RE: Comment Letter – Sherman Oaks Center for Enriched Studies (SOCES) Comprehensive Modernization Project – Notice of Availability of a Draft Environmental Impact Report

Dear Ms. Smith:

Thank you for the opportunity to comment on the Notice of Availability of a Draft Environmental Impact Report for the Sherman Oaks Center for Enriched Studies (SOCES) Comprehensive Modernization Project ("Project") located in the City of Los Angeles. 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.

E-1

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TDCs). 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.

Project Description

The proposed Project encompasses most of the SOCES school campus and consists of the comprehensive modernization of the school, including demolition, construction, and renovation activities. The Project includes demolition of the gymnasium, lunch shelter, transportation building, and four classroom buildings; removal of 12 classrooms in re-locatable buildings; construction of four classroom buildings, gymnasium, field house/toilet building, and lunch shelter; remodel and modernization of the auditorium, administration and counseling buildings.

Metro Comments

Metro Bus Service Adjacency

Metro bus lines 150/240, 164, 744 operate on Victory Boulevard and Reseda Boulevard, adjacent to the proposed Project. Several Metro bus stops on Victory Boulevard and Reseda Boulevard are directly adjacent to the proposed Project. The following comments relate to bus operations and the bus stop:

E-2

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- Although the Project is not expected to result in any long-term impacts on transit, the Project sponsor should be aware of the bus facilities and services that are present. With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential impacts on the Metro bus lines. Potential impacts could include construction traffic as well as operation of and shipment/deliveries to the completed Project.
- 2. The existing Metro bus stop must be maintained as part of the final Project. 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 with any questions at least 30 days in advance of initiating construction activities.
- 3. Metro Strongly Encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks, ADA-compliant curb ramps, 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 nearby bus stops. The LAUSD should consider the installation of such amenities as part of the conditions of approval for the Project.
- 4. Any planned wayfinding signage that also includes Metro content/information must conform to Metro Signage Stancards. Please contact Lance Glover, Senior Manager with Metro Signage & Environmental Graphic Design, with any questions at GloverL@metro.net or 213.922.2360 for the latest version of these standards. Metro reserves the right to review and approve any use of its information on such signage. 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.
- 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.

Transit Orientation

Considering the proximity to the Metro Orange Line Reseda Station, Metro would like to identify the potential synergies associated with transit-oriented development:

- Metro supports development of commercial and residential properties near transit stations
 and understands that increasing development near stations represents a mutually beneficial
 opportunity to increase ridership and enhance transportation options for the users of the
 developments. Metro encourages the City and Project sponsor to be mindful of the Project's
 proximity to transit.
- Metro would like to inform the Project sponsor of Metro's employer and student transit pass programs. The Annua Transit Access Pass (A-TAP) and Student Transit Access Pass (S-TAP) are programs which offer efficiencies and group rates to agencies like CUSD that can offer employees as an incentive to utilize public transit and for students to receive a reduce fare. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.

E-3

E-2

Cont'd

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- 3. Metro strongly encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies should be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.
- 4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
- 5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability path design guidelines.pdf

E-3 Cont'd

6. Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access the nearby bus stops. LAUSD should consider the installation of such amenities as part of the conditions of approval for the Project.

Active Transportation

Metro encourages the promotion of bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or secured bike room, for students, faculty and staff. Bicycle parking facilities should be highly visible, easy to locate, and sitec 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 Reseda Station. The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

E-4

Congestion Management Program (CMP)

Beyond impacts to Metro facilities and operations, Metro must also notify the Project sponsor of state requirements. A Transportatior 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:

E-5

- 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).
- 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

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- 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.
- Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

E-5 Cont'd

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.ne. Metro looks forward to reviewing the Final EIR. Please send it to the following address:

Metro Development Review One Gateway Plaza MS 99-18-63 Los Angeles, CA 90012-2952

Sincerely,

Derek Hull

Manager, Transportation Planning

pred R. Hull.

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

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E. Response to Comments from LA County Metropolitan Transportation Authority, dated April 19, 2018.

- E-1 This comment includes an introductory paragraph and Project summary; no response is required.
- E-2 This comment discusses bus stops on Victory Boulevard and Reseda Boulevard and operations. 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 or install wayfinding signage. None of the existing campus driveways would be relocated near transit stops. Construction traffic would not interrupt bus service. The list of comments does not specifically address the proposed Project or the adequacy of the Draft EIR.
- E-3 The Project would not construct commercial or residential developments and LAUSD is aware of Metro's employer and student transit pass programs. 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

The proposed Project does not include changes to the existing main entrance and student drop-off/pick-up zones. As part of the Project, additional parking will be provided to accommodate the existing campus needs, which should reduce the amount of parking on the surrounding streets.

- E-4 See response to Comment E-3.
- E-5 This comment outlines State and Metro requirements for Congestion Management Program. This Project would not change existing traffic patterns or the number of vehicles on the roadways.

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