

**INTERNATIONAL STUDIES
LEARNING CENTER ADDITION
Final Environmental Impact Report
SCH # 2016071011**

Prepared for:

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

Prepared by:

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9.0 INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for the Reuse of the International Studies Learning Center Addition Project. This document together with the Draft EIR and its technical appendices comprise the Final EIR. The document has been prepared by Los Angeles Unified School District (LAUSD), Office of Environmental Health and Safety (OEHS) in accordance with the California Environmental Quality Act (CEQA).

The Final EIR is required under Section 15132 of the *State CEQA Guidelines* to include the Draft EIR, comments and recommendations received on the Draft EIR, the responses of the lead agency to significant environmental issues raised by those comments in the review and consultation process, and any other relevant information added by the lead agency (including minor changes to the Draft EIR). A Mitigation Monitoring and Reporting Program is also required; it can be a separate document, or, as in this case, included in the Final EIR.

The evaluation and response to comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; (5) the ability to discover public concerns.

This document provides revisions to the Draft EIR made in response to comments, staff review, and/or changes to the proposed project. These revisions also correct, clarify, and amplify the text of the Draft EIR, as appropriate, and do not alter the conclusions of the Draft EIR.

PROCESS

In accordance with Section 15050 of the *State CEQA Guidelines* LAUSD is the lead agency that prepared both the Draft and Final EIR for the project, the International Studies Learning Center Addition. LAUSD prepared and circulated the Draft EIR for a period of 45 days, extending from April 10, 2017 and ending on May 24, 2017. The Draft EIR was available for review at the LAUSD OEHS at 333 South Beaudry Avenue, LAUSD Local District East Office at 2151 N. Soto Street), Legacy High School in South Gate at 5225 Tweedy Boulevard, Leland R. Weaver Library at 4035 Tweedy Boulevard, and an electronic copy of the Draft EIR was posted on the LAUSD OEHS website. A public hearing on the Draft EIR was held on April 27, 2017 at Legacy High School Complex Multi-Purpose Room located at 5225 Tweedy Boulevard in South Gate. A Notice of Availability of the Draft EIR was transmitted to responsible and trustee agencies,

regulatory agencies and other to request comments on the Draft EIR, pursuant to *State CEQA Guidelines* Section 15086. Comments on the Draft EIR were received during the comment period, and those comments are responded to in this Final EIR. The Final EIR, together with the proposed project, will be submitted to the City Council for review, and the Council will consider certification of the Final EIR and approval of:

- Adoption of the Proposed Project
- Design Review

CONTENT OF THE FINAL EIR

As discussed above, the primary intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft EIR. Pursuant to Section 15088 of the *State CEQA Guidelines*, LAUSD has reviewed and addressed all comments received on the Draft EIR by the comment period deadline. Included within the Final EIR are the written comments that were submitted during the public comment period as well as oral comments (relevant to the EIR) received at the public hearing.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR includes the following chapters and appendices:

Section 9.0: Introduction. This chapter provides a brief introduction to the Final EIR and its contents.

Section 10.0: Corrections and Additions. This chapter provides a list of corrections and additions to the Draft EIR. None of the changes significantly impact the conclusions presented in the Draft EIR.

Section 11.0 Responses to Comments: This chapter provides a list of commenting agencies, organizations, and individuals. Responses to all comments on the Draft EIR are also included in this chapter.

Section 12.0 Mitigation Monitoring and Reporting Program: This chapter includes the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the *State CEQA Guidelines*.

The Final EIR also includes the previously circulated Draft EIR.

REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency 10 days prior to certification of the Final EIR. The Final EIR is available for public review at:

- LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Los Angeles 90017
- LAUSD Local District East Office, 2151 N. Soto Street, Los Angeles, 90032
- Legacy High School – International Studies Learning Center Office, 5225 Tweedy Boulevard, South Gate 90280
- Leland R. Weaver Library, 4035 Tweedy Boulevard, South Gate, CA 90280

In addition, the NOP/IS is available online at the LAUSD Office of Environmental Health & Safety website (<http://achieve.lausd.net/CEQA>).

10.0 RESPONSES TO COMMENTS

The Draft EIR for the International Studies Learning Center Project was circulated for public review on April 10, 2017. The public review period, which ended on May 24, 2017, afforded public agencies, organizations, and the public in general the opportunity to review the Draft EIR and submit written comments regarding the Draft EIR and the proposed Project in accordance with Section 15073 of the *California Environmental Quality Act (CEQA) Guidelines*.

A total of four agencies and one organization provided comments and/or letters during the circulation period for the Draft EIR. In addition, 25 individuals provided oral comments at a public hearing held on April 27, 2017. This section includes copies of the letters and other comments received, with the responses to the comments raised immediately following each letter.

Comment Number	Commenter	Name	Date
A	Public Agencies		
A1	Native American Heritage Commission	Gayle Toten	April 18, 2017
A2	City of South Gate	Celeste Stahl Brady	May 22, 2017
A3	Governor's Office of Planning and Research	Scott Morgan	May 23, 2017
A4	California Department of Transportation	Dianna Watson	April 28, 2017
B	Organizations		
B1	Padres Unidos	Ivonne Loucel	May 19, 2017
C	Oral Comments		
C1	Public Meeting	Various	April 27, 2017

PUBLIC COMMENT AND RESPONSES

The following pages provide the written comment letters and the Districts' responses to these comments.

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710

Edmund G. Brown Jr., Governor



April 18, 2017

Ed Paek, AICP
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

sent via e-mail: Edward.paek@lausd.net

Re: SCH# 2016071011, International Studies Learning Center Addition Project, Community of South Gate; Los Angeles County, California

Dear Mr. Paek:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Introduction and Project Description, the Summary of Project Impacts, Mitigation Measures, and Residual Impacts section, and the Effects Found Not to be Significant section prepared by Impact Sciences for the Los Angeles Unified School District. We have the following concerns:

- There is no Tribal Cultural Resources section or subsection in the Executive Summary as per California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>
- There is no documentation of **government-to-government consultation by the lead agency** under AB-52 with Native American tribes traditionally and culturally affiliated to the project area as required by statute, or that mitigation measures were developed in consultation with the tribes.
- There are no mitigation measures specifically addressing Tribal Cultural Resources separately. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources.
- Mitigation for inadvertent finds of Archaeological Resources, Cultural Resources, Tribal Cultural Resources, or Human Remains is missing or incomplete. Standard mitigation measures should be included in the document.
- Cultural Resources assessments are outdated (2008). Current assessments should adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources.

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The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources"⁵, that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁶ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or

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¹ Pub. Resources Code § 21000 et seq.

² Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)

³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)

⁴ Government Code 65352.3

⁵ Pub. Resources Code § 21074

⁶ Pub. Resources Code § 21084.2

⁷ Pub. Resources Code § 21084.3 (a)

amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

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

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

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

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

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

Sincerely,

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

Attachment

cc: State Clearinghouse

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⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.

Pertinent Statutory Information:

Under AB 52:

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

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

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

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

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

1. The following topics are discretionary topics of consultation:

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

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

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

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

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

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

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

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

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

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

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

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

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

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

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (e)

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸
This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of “preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county’s jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor’s Office of Planning and Research’s “Tribal Consultation Guidelines,” which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a “Tribal Consultation List.” If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- There is no Statutory Time Limit on Tribal Consultation under the law.
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city’s or county’s jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- Contact the NAHC for:
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project’s APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor’s Office of Planning and Research (2005) at p. 18).

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.991).

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

Letter Number A1: Native American Heritage Commission

Native American Heritage Commission
Harbor and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691

Response A1-1

As provided on pages 35 and 36 of the Initial Study (see Appendix 1.0), No known “tribal cultural resources” as defined under Public Resources Code 21074 are located on the Project site. In accordance with California Public Resources Code section 5097.9, a letter was sent to the NAHC on October 9, 2015 for a related Project occurring on the Project site, requesting outreach with the local tribes, in regards to the Project site. The District did not receive any outreach request from the NAHC. LAUSD sent the Notice of Preparation to the NAHC on July 1, 2016. No response was received from NAHC.

Response A1-2

As provided on pages 35 and 36 of the Initial Study (see Appendix 1.0), No known “tribal cultural resources” as defined under Public Resources Code 21074 are located on the Project site. In accordance with California Public Resources Code section 5097.9, a letter was sent to the NAHC on October 9, 2015 for a related Project occurring on the Project site, requesting outreach with the local tribes, in regards to the Project site. The District received no outreach request from the NAHC.

Response A1-3

As provided on pages 35 and 36 of the Initial Study (see Appendix 1.0), No known “tribal cultural resources” as defined under Public Resources Code 21074 are located on the Project site. The Project site has been the subject of remediation activities under the supervision of DTSC; therefore, it is unlikely that any undiscovered resources remain on the site. SC-CUL-18 addresses the unanticipated discovery of not only archeological resources but also Tribal Cultural Resources. Specifically, SC-CUL-18 states that “all work shall stop within a 30 foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.”

Response A1-4

Standard conditions are included in the Initial Study (See Appendix 1.0 Pages 35 through 37) for the document as well as listed in the Project Description in the DEIR page 2.0-26. The text of the standard conditions is provided below. These conditions are included on all LAUSD projects. The following text is from pages 35 through 37 of the Initial Study.

Although the unanticipated discovery of unique archeological resources is possible during soil excavation activities (e.g., during installation of utilities), based on the lack of previous resources on the site, the probability that archeological resources will be discovered is low. In addition, compliance with Program EIR **SC-CUL-13**, **SC-CUL-17**, and **SC-CUL-18** (included below), would require that upon discovery of an archeological resource (1) construction activities in the immediate area of the find shall cease and LAUSD shall retain a qualified archaeologist to determine the significance of the find, (2) LAUSD shall determine if a Phase III Data Recovery/Mitigation Program is necessary, and (3) if the archeological resource is a Native American resource work shall stop within a 30-foot radius of the discovery.

- **SC-CUL-13:**The contractor shall halt construction activities in the immediate area and notify the LAUSD. LAUSD shall retain a qualified archeologist to make an immediate evaluation of significance and appropriate treatment of the resource. To complete this assessment, the qualified archeologist will be afforded the necessary time to recover, analyze, and curate the find. The qualified archeologist shall recommend the extent of archeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the building site while evaluation and treatment of historical or unique archeological resources takes place.
- **SC-CUL-17:**LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. A Phase III Data Recovery/Mitigation Program would be designed by a Qualified Archaeologist to recover a statistically valid sample of the archaeological remains and to document the site to a level where the impacts can be determined to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an archaeological monitor shall be present on site to oversee the grading, demolition activities, and/or initial construction activities to ensure that construction proceeds in accordance with the adopted Phase III Data Recovery/Mitigation Program. The extent of the Phase III Data Recovery/Mitigation Program and the extent and duration of the archaeological monitoring program depend on site-specific factors.
- **SC-CUL-18:** All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

Response A1-5

The site has been the subject of remediation activities under the supervision of DTSC. Prior to the 1980s, the Project site was used for light industrial and commercial operations. These historic uses resulted in contamination of the groundwater and soil on the Project site. Prior to construction of the proposed Project, in compliance with direction from the DTSC, the District was required to propose and carry out remedial activities necessary to remove the contaminated soil and remediate the groundwater on the Project site. These activities required extensive ground disturbing. No tribal cultural resources have been

discovered to date. Based on the past use and remediation activities, it is unlikely any resources exist on the site. Nonetheless, the District has included Standard Condition SC-CUL-18 in the Project which would reduce any potential impacts due to the discovery of tribal cultural resources. See Response A1-4.

Response A1-6

As provided on pages 35 and 36 of the Initial Study (see Appendix 1.0), No known “tribal cultural resources” as defined under Public Resources Code 21074 are located on the Project site and thus, no significant environmental impact to such resources are expected to result from the proposed Project. In accordance with California Public Resources Code section 5097.9, a letter was sent to the NAHC on October 9, 2015 for a related Project occurring on the Project site, requesting outreach with the local tribes, in regards to the Project site. The District received no outreach request from the NAHC..

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May 22, 2017

Via Federal Express (Original)
and Via Email (Copy) ceqa-comments@lausd.net

Edward S. Paek, AICP
CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 Beaudry Avenue, 21st Floor
Los Angeles, California 90017

Re: City of South Gate ("City") Comments and Objections to Draft Environmental Impact Report ("DEIR") for Los Angeles Unified School District ("LAUSD") International Studies Learning Center ("ISLC" or "Proposed Project")

Dear Mr. Paek:

The undersigned of this firm is special counsel to the City of South Gate; at the direction of the City Attorney and senior staff, this letter presents the City's comments and objections to the DEIR for the LAUSD ISLC Proposed Project. The California Environmental Quality Act, Public Resources Code Section 21000, *et seq.* and the implementing guidelines, Title 14 California Code of Regulations Chapter 3, Section 15000, *et seq.* (together, "CEQA"). Under CEQA, to the extent any of the comments and objections presented in this letter are not fully addressed by LAUSD in the DEIR, these must be addressed in the final Environmental Impact Report ("EIR") for ISLC. Further, the City reserves all rights to provide additional comments and objections, if any, prior to the conclusion of a public hearing on the DEIR for the Proposed Project.

Under the DEIR LAUSD proposes to design, build and operate the International Student Learning Center on a 4.9-acre LAUSD-owned parcel located adjacent to the 35.2-acre new Legacy High School Campus ("LHSC") at 5225 Tweedy Boulevard, South Gate, which is bounded by Tweedy Boulevard to the north, Chakemco Street to the south, Adella Avenue to the east, and an aluminum forger and a truck sale business to the west. As proposed, the ISLC Proposed Project would serve middle school students (in particular from the now overcrowded South Gate Middle School) and include a 4,528 square-foot administrative building, a 16,195 square-foot multi-purpose room and gym facility, a two-story 28,915 square-foot classroom building for 16 classrooms, a 2,147 square-foot lunch shelter and a fenced/gated, secure faculty/staff parking lot with 40 spaces.

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According to the DEIR, during the 2015-2016 school year, 868 middle and high school students attended ISLC, including 408 students in 6th, 7th, and 8th grades, and 460 students in 9th through 12th grades. Upon completion of the proposed Project, the ISLC middle school program that is currently operating on the Southeast Middle 2.0 Project Description Impact Sciences, Inc. 2.0-3 International Studies Learning Center Addition Project Draft EIR 695.015 April 2017 School campus would be relocated to the ISLC campus (460 students).

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The City's comments and objections in this letter focus on the analyses in the DEIR that do not meet the requirements of CEQA and on the topics that were not even analyzed as required by CEQA, including the following categories/topics: (i) Pedestrian Safety; (ii) Traffic and Transportation; (iii) Noise; (iv) Public Safety; (v) Lighted Regional Athletic Fields; (vi) Public Services; (vii) Overcrowding Effects; (viii) Aesthetics and Residential Buffer; and (ix) Hazardous Materials, with the most significant concerns relating to LAUSD ensuring student safety as pedestrians, completing necessary traffic improvements, addressing parking issues created by traffic and pedestrian safety issues, and mitigating impacts to the existing single-family neighborhoods, especially along Aldrich Road (245 feet) and Adella (550 feet) adjacent or near the ISLC campus.

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The DEIR does concede that the Proposed Project will cause significant traffic impacts that can be mitigated to insignificance by the installation and use of a traffic signal ("Traffic Signal") near the new ISLC campus at the three-way intersection of Wright Road, Atlantic Boulevard and Chakemco Street, but otherwise apparently LAUSD's intention is to override the significant impacts without good faith consideration of reasonable and feasible mitigation measures, which evidences non-compliance, even bad faith non-compliance, with CEQA. Therefore, the City trusts and expects that LAUSD will reasonably and in good faith consider the follow comments and objections and revise the DEIR to properly analyze and mitigate the environmental impacts of the ISLC Proposed Project.

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Pedestrian Safety (Section 3.5)

The primary access for pick-up and drop-off operations for the existing LHSC is currently along Tweedy Boulevard, which is accessible from Atlantic Avenue, from Adella and will be accessible from Chakemco Street and other access points. Currently, for LHSC vehicles from Atlantic Avenue travel in an easterly direction on Tweedy Boulevard into drop-off and pick-up zones for passenger cars. Under the DEIR, for the ISLC the proposed the drop-off and pick-up operation will use the *same* access from Atlantic to Tweedy, albeit with a separate curbed vehicular drop-off and pick-up lane, similar to LHSC, with vehicle queuing of about 16 vehicles on-site as shown in Figure 2.0-4, along with speed humps in the two drive-through lanes and signage along the parkway to restrict parking in the drop off and pick up area during arrival and dismissal times.

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Recently, the City was copied on a letter May 19, 2017 from *Padres Unidos de South Gate* to Dr. Ref Rodriguez PhD, LAUSD Board Member with copies to Mayor Davila and LAUSD Superintendent Michelle King, and others (copy attached), which letter voices strong objections and concerns of parents about the unsafe traffic congestion, circulation, pedestrian safety and related ingress/egress issues from existing operations of LHSC using the single access point from Atlantic onto the Tweedy drop-off/pick-up area. Rightly and with a real factual basis, *Padres Unidos de South Gate* requests (i) Tweedy access to the ISLC (and LHSC) be widened to allow for three

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lanes instead of two, (ii) opening another entrance off of Chakemco Street (as too identified in this letter by the City), (iii) need for improved bicycle and pedestrian access as the means to enhance student safety and to alleviate traffic congestion, to which the City concurs. According to the parents more than 10% of LHSC students already bike to school, which means the trend may continue and certainly ISLC middle-school students too will bike to school, as will others to the new, lighted regional fields.

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And, even before receiving the *Padres Unidos de South Gate* letter, LAUSD was aware that many parents of students at LHSC and neighboring businesses and residents have complained to both LAUSD representatives and the City about already excessive queuing and bottleneck conditions and other traffic and pedestrian safety issues associated with the existing Tweedy access and operation of ingress/egress and drop-off/pick-up to/from the LHSC. (See: pp. 90, 117, 119 of Appendices.) The impacts from the operation of the new ISLC middle school will exacerbate these issues and further burden both Tweedy and the nearby streets. The City understands both from the DEIR and from the parents of LHSC students and businesses and residents that Tweedy will remain the main access to both LHSC and ISLC. As requested by *Padres Unidos de South Gate*, businesses, residents and other stakeholders impacted by the Proposed Project, additional, improved access to/from ISLC (and LHSC) will be necessary; nonetheless, the DEIR seems to conclude other access points will not occur or are otherwise infeasible, and these conditions are not a significant impact. However, one or more feasible, additional access points already exist, especially via Chakemco Street that runs parallel to Tweedy Boulevard to the south, and one side of the ISLC building will face Chakemco, but use of Chakemco or other access points will require roadway improvements to be undertaken and paid for by LAUSD as mitigation measures under the ISLC EIR.

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The DEIR does not properly or fully address Chakemco, which fails in CEQA compliance. Only a single point of access through Tweedy is not adequate; inevitably and more than reasonably foreseeable, Chakemco will be used for middle school access. [Nonetheless the DEIR has NO meaningful discussion about this alley-like street--it is narrow, has no sidewalks, has a culvert running down the middle, and haphazard parking patterns including trucks occur by the business uses, which all present serious issues, even dangerous conditions, to student safety—walking and biking to school. LAUSD’s sorely limited analysis in the DEIR in fact itself justifies improvement of Chakemco with, at a minimum, sidewalks on at least one side of the street, and to achieve real pedestrian and bicyclist safety the alley-like roadway needs to be improved by LAUSD to accommodate the inevitable vehicle access that will jeopardize the students/pedestrians/bicyclists going to/from the ISLC sited along Chakemco. (See copies of photos downloaded from GoogleEarth as well as maps from the DEIR depicting current conditions and the location of ISLC on Chakemco and in very close proximity to the new ISLC campus.)

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The State of California CalTrans safe routes to school standards affirmatively require that within a one-quarter-mile radius of a school facility there must be paths to/from campus improved with sidewalks:

- SC-PED-1 Caltrans SRTS Program requires: “This pedestrian safety evaluation includes a determination of whether adequate walkways and sidewalks are provided along the perimeter

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of, across from, and adjacent to a proposed school site and along the paths of identified pedestrian routes within a 0.25 mile radius.”

- SC-PED-2 Traffic and Pedestrian Safety requirements: LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for student drop-off areas, vehicle access, and *pedestrian routes to school*.
 - Appendix C of the SUP Program EIR states school traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
- SC-PED-3 Sidewalk requirements for New Schools: LAUSD shall coordinate with the responsible traffic jurisdiction/agency to ensure these areas are improved prior to the opening of a school. improvements shall include but are not limited to: (1) clearly designate passenger loading areas with the use of signage, painted curbs, etc.; (2) install new walkway and/or sidewalk segments where none exist; (3) any substandard walk/sidewalk segments shall be improved to a minimum of eight feet wide; and (4) provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
- The Safe, Accountable, Flexible, Efficient Transportation equity Act: A Legacy for Users is a federal program, administered by each State, that encourages school children to walk and bicycle to campus. While LAUSD mentions this program, the DEIR does not fulfill the necessary infrastructure to provide a safe, appealing environment for ISLC students who are walking or biking to school.

City staff confirms there are NO sidewalks on Chakemco, and an online search of GoogleEarth reveals NO sidewalks, and the haphazard parking on this substandard roadway. This evidences deficient conditions for a public street directly adjacent and accessible from the ISLC campus, which conditions are the responsibility of LAUSD to resolve and mitigate. Otherwise, middle-school students (ages approx. 11 to 14) will be walking down the middle of this alley-like street, in conflict with traffic, with parked vehicles obstructing access, and the timing of stacking/queuing traffic will impact students’ ingress/egress to an unsafe, unacceptable degree. The right-of-way options for Chakemco need to be analyzed, addressed and fully mitigated in the DEIR by LAUSD as the lead agency.

In the DEIR LAUSD concedes it is required by law to cause “construction of bicycle and pedestrian safety and traffic calming projects” and is responsible to establish and enforce school route plans and for siting and developing school facilities that “*foster a good walking environment.*” The DEIR fails in its analysis of Chakemco as to pedestrian safety; just look at the various maps included in the DEIR to see the close proximity and easy shortcut for students to walk down Chakemco, not Tweedy, to get to Atlantic. None of the street and sidewalk improvements to be made off-site as part of the Proposed Project include any improvements to Chakemco:

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- Tweedy Boulevard would be vacated and widened to accommodate drop-off and pick-up accommodations for the ISLC addition (which was already required as part of the mitigation measures for construction and operation of LHSC under the December 2009 Memorandum of Understanding, as amended (“MOU));
- Appropriate traffic controls such as school warning signs, speed limit signs, school crosswalks, and pavement markings, BUT NO NEW SIDEWALKS, except the new sidewalk committed to be constructed on one side of Tweedy as an LAUSD agreed-to mitigation measure for undertaking and operating LHSC under the MOU.

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Further, the DEIR fails to analyze the conformity of the proposed pedestrian facilities (e.g. sidewalks) to the pedestrian facilities required by the City’s General Plan or the adequacy of such facilities to accommodate pedestrian traffic to and from events at the regional athletic fields that will have day and night use. CEQA requires LAUSD to mitigate its impacts and LAUSD must describe and commit to do so in its mitigation measures by paying for and installing required improvements. The City cites to page 3.5-1 that also evidences the need for LAUSD to construct sidewalks on Chakemco. And, section 3.5.4 Methodology too evidences the need for sidewalks on Chakemco to comply with the SRTS Program. Chakemco provides direct access to the school in an area that has industrial uses. Without sidewalks, in fact all pedestrians will be at-risk, particularly anyone with a disability and young students.

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Section 3.5.5 additionally supports the need for sidewalks on Chakemco – “Impacts related to pedestrian safety are considered significant if the proposed Project would: PED-2 Create unsafe routes to schools for students walking from local neighborhoods.” And, Section 3.6-22 – Traffic Study does not adequately address the pedestrian safety per standards noted above since sidewalks on Chakemco are not proposed for mitigation of impacts in the DEIR and thus the DEIR fails as an adequate environmental assessment. The same objection is lodged as to bicyclist safety as there are few to no bike paths along the access points to/from the ISLC Proposed Project or now as to LHSC.

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Further, separate from Chakemco, the DEIR does not address, no reference is made to, pedestrian access from the southern side of the ISLC site, nor access from the existing bike path/lane found along the Los Angeles River. Innumerable LHSC students already use the LA River bike trail to/from school, but there is no discussion about walking or bicycling to, and use of, this existing, improved bike trail by ISLC (and LHSC) students or the necessary and convenient access to the bike trail for middle-school students. Ease of bicycle and pedestrian access to the LA River trail will lessen pedestrian use of surrounding local streets.

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As suggested mitigation at a minimum there must be improvements to Chakemco and nearby adjacent streets that establish safe diversionary measures to manage student pedestrian use and vehicle access to/from both campuses at LHSC and ISLC. And, the DEIR should discuss the feasibility and potential to modify the building footprint for the ISLC middle school and determine safe routes to both school campuses by pedestrians and vehicles dropping off and picking up students, as well as address the impacts to existing businesses and residents.

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Traffic/Transportation Section 3.6.

1. The Traffic Study and DEIR fail to account accurately for the cumulative number of inbound and outbound students attending LHSC and ISLC per day.

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2. The Traffic Study and DEIR fail to consider the impact of students arriving by public transportation, bicycle or pedestrian traffic between bus stops and ISLC.

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3. The Traffic Study and DEIR fail to consider or discuss the impacts on traffic, parking, bicycles and pedestrians attending events at the lighted regional athletic fields for day use, school hours use, and night use.

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4. The Traffic Study and DEIR fail to analyze existing conditions on Aldrich and Wright streets.

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5. The Traffic Study and DEIR fail to analyze the nearby residential streets; Wright St. was not evaluated. The DEIR needs to analyze the segments of Wright to Abbot and to Chakemco.

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While the DEIR mentions, and through discussions between and among LAUSD and City representatives there has been in concept a commitment by LAUSD to negotiate and enter into a Memorandum of Understanding (“MOU”) with the City for the acquisition of necessary right-of-way and installation/construction of the Traffic Signal, the initial draft of that MOU does not commit clearly to LAUSD being responsible to pay for all costs associated with such acquisition and construction of the Traffic Signal. To be clear--the City objects to any cost-sharing with LAUSD related to the acquisition proceedings and construction through completion to make the Traffic Signal operational prior to the opening of the ISLC Proposed Project.

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Further, the DEIR, in particular the traffic study, has no analysis of certain adjacent public streets to ISLC, including Aldrich at Wright south of Chakemco. While the traffic study has some analysis of Atlantic, the study stopped at Atlantic and there is no discussion at all about the levels and impacts on these other roads and points of access toward the campuses. In addition, the DEIR and traffic study must consider the cumulative impacts that construction will cause on existing roadways; there inevitably will be damage to major collectors and arterials from the construction project and operation of the new school, which need to be mitigated. And, the DEIR must address restoration of roadways to their pre-project conditions due to the construction of the ISLC Proposed Project. For example and from actual, recent experience--the construction of LHSC caused significant road damage to Chakemco, Adella, Wood, and Duncan roadways, but none of this damage to this public property was restored or otherwise corrected properly by LAUSD.

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Secondary and Ancillary Traffic and Safety Impacts related to On-Site and Off-Site Parking Issues from the Proposed Project.

The City disagrees with LAUSD’s position that “parking is not a CEQA issue”. While parking itself may not be a separate category to be evaluated in an Initial Study or and EIR (or an MND), parking issues are an ancillary, secondary environmental impact due to primary impacts of this Proposed Project which will cause traffic congestion, pedestrian safety and other safety hazards as explained in this letter and as already voiced to LAUSD by the community. Thus, although parking issues created by the ISLC (and LHSC) campuses are not in and of themselves a primary impact under CEQA,

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nonetheless these secondary impacts due to parking deficits both on-site or off-site are impacts that require CEQA analysis in the DEIR. (See: DEIR Appendices, Initial Study and pp. 90, 117, 119 that early on conceded substantial impacts to traffic *congestion* along with the transcribed objections at public forums that shared these same concerns.)

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The DEIR fails to clearly explain or identify how access and use of the new, lighted regional athletic fields will be effectively managed and impacts mitigated during school hours, after-school, and during evening and weekend events such as football, soccer, softball and related sports activities. The DEIR fails to study the environmental effects on noise, air quality, traffic and/or pedestrian safety of the athletic uses on the regional athletic fields. While the City encourages and supports LAUSD's objectives and goals for the regional athletic fields, even the addition of lighted fields for school and community activities, according to the DEIR, the new 40 space faculty/staff parking lot will not be available and will not adequately serve middle school special events, athletic uses or other "beyond the bell" uses; therefore, vehicles will access the fields and park in the adjacent neighborhoods both in the nearby residential and business areas. The DEIR states access to this faculty/staff parking lot will be prohibited to non-staff during school hours and will be secured and unavailable during beyond the bell events, thereby exacerbating the traffic and pedestrian safety effects on the surrounding neighborhoods. LAUSD must develop and commit to contingency plans to efficiently and safely circulate vehicles, pedestrians and park the patrons arriving and departing all events, both special and routine, at the ISLC campus.

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Land uses on the properties surrounding the ISLC Proposed Project site include multi-family residences, single-family residences, commercial land uses, industrial land uses, and educational land uses. Nearby sensitive receptors include: the Aldrich Road Residences that are located along Aldrich Road, approximately 245 feet south of the Project site; and, the DEIR fails to account for the Adella residential areas and noise emanating from athletic uses on these single-family residential uses and the quiet enjoyment of the residents' homes.

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The foreseeable impacts of the Proposed Project on the surrounding and nearby residential neighborhoods and existing business operation are inevitable; the conditions will trigger the need to establish and enforce a "residents only" and "local business only" parking permit programs and/or limited short-term parking posted in order to prevent traffic impacts to the neighborhood from school operations and visitors to middle school and athletic facilities from monopolizing and overtaking the neighborhood's on-street parking and vehicle circulation.

As noted, the DEIR states that just 40 off-street parking spaces will be available exclusively for faculty and staff at ISLC; however, the faculty and staff numbers are only for the middle school's initial existence. The figure of 40 gated, on-campus parking spaces ignores increases in student population that in turn causes increased traffic and pedestrians as well as the need for on-site parking available to faculty and staff and visitors. As has occurred with all other LAUSD schools in the City, when additional faculty and staff members are hired, concurrent with increases in the student population, it is clear the parking to be provided as described in the DEIR is *prima facie* insufficient. The DEIR must analyze the impact upon vehicle access and parking from projected student population and projected hires and amend the Proposed Project scope to incorporate additional improvements, including parking spaces and/or require mitigation measures to address this issue.

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The DEIR traffic and related parking needs assumptions do not address or consider the impacts of the myriad of middle school extracurricular activities and events that are held both during school hours, after school hours, and on non-school days. The DEIR only discusses school drop-off/pick-up. The DEIR appears to rely on Legacy Lane, the new connector public street to be constructed by LAUSD as a part of the LHSC mitigation, for off-site parking, but LAUSD cannot double-count those on-street spaces: LAUSD relied on Legacy Lane for off-site parking for LHSC so cannot too conclude that Legacy Lane will meet off-site, on-street parking needs for the ISLC Proposed Project. Further, few other on-street parking spaces, especially unrestricted parking spaces, are available within a quarter-mile of the Proposed Project. In addition, LAUSD is fully aware that for public safety reasons the City will be imposing limitations and restrictions on some or all of Legacy Lane and other on-street parking spaces in the neighboring areas, including hour-limits, required permits with exclusions for use by non-residents and non-businesses such as parents and guests along with the general public that will use the ISLC facilities for school, sporting and other community events. Thus, insufficient on-street parking spaces exist now, and insufficient parking will exist to accommodate vehicles and drivers even with completion of Legacy Lane, to accommodate the expected number of vehicles, visitors and guests to the school, sporting and community events. The DEIR provides no analysis of the impact of inadequate parking or mitigation measures related to these impacts, for which the end result will be parking in vehicles impacting the surrounding business and residential neighborhoods that will result in additional impacts not identified, discussed, or analyzed in the DEIR.

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As an overall comment and objection, in addition to above, LAUSD places the entire onus on the City as to impacts from operation of Legacy Lane. The use of Legacy Lane needs to be properly addressed such that perimeter fencing of athletic fields and related facilities are completed to limit direct access and use of Legacy Lane as off-site parking for ISLC.

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Curiously, in the DEIR there is a limited discussion about a proposed community garden near the faculty/staff parking lot, but no dimensions or further description are specified. What are the details? How would the community access the community garden, what will be the operational rules, will the community garden be accessible after the bell when the ISLC campus is secured from public access?

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Noise Section 3.4.

As part of the Proposed Project, nighttime field lights would be added to the regional athletic fields planned for the southern portion of the LHSC campus. These lights are to conform to LAUSD's Design Standards for field lighting.

- "The majority of school noises would also occur during daytime hour, not early morning or evening hours when people are more sensitive to noise." Page 3.4-25
- "As part of the proposed project, nighttime field lights would be added to the athletic fields planned for the southern portion of the LHSC campus. These lights would conform to the District's Design Standards for field lighting." Page 2.0-11

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The first bullet point is taken from the Noise section, wherein school noises are described as primarily "daytime" activities. The second bullet point is taken from the Project Description section, wherein "nighttime field lights" are proposed for the athletic fields. The DEIR has internally conflicting statements

Mr. Edward S. Paek, AICP
CEQA Project Manager
Los Angeles Unified School District
May 22, 2017
Page 9

about day and evening activities, in particular the expected impacts related to noise attenuation (and parking and other issues discussed in this letter).

The DEIR asserts that noise from student activities would be limited to school day hours. This assumption has not proven true for the operations of LHSC, nor are the noise impacts of the myriad of extracurricular middle school activities considered in the DEIR such as outdoor activities, sporting events, school events like back-to-school night, awards ceremonies, student exhibitions, dances, and other campus activities that often occur both after school hours and after 7:00 p.m. (the first noise sensitivity threshold). Also, the DEIR acknowledges use of the ISLC campus facilities for community events, both day and night activities, including at the regional athletic fields and at special events, which likely will take place during non-academic hours when the impacts of noise are most acute. Further, there may be joint use agreements for school facilities that will also generate vehicular related operational noise as students, spectators, parents and others come and go from the campus facilities and athletic fields. The DEIR must discuss the noise levels from activities likely to occur before and after normal school hours and propose and analyze appropriate mitigation measures.

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In addition, contrary to conclusive statements, the environmental impacts from construction noise are not fully mitigated because the DEIR only commits to the ISLC contractor to build a sound attenuation wall only along the property line adjacent to residential “*when necessary*” at the south side of Legacy Lane. Details of the type and location of fencing/walls are critical to be addressed and evaluated in the DEIR; and LAUSD needs to commit to sound attenuation fencing/walls along the *entire perimeter* for buffer and mitigation of noise. Proper fencing/walls both during construction, and for the permanent facilities, are necessary not only for sound attenuation, but too as a buffer to the residential uses and for aesthetic mitigation. It is not acceptable that “...ambient noise levels at the Aldrich Road [R]esidences beyond the City’s 50 dBA standard for duration of greater than 30 minutes per hour during construction work hours are significant but unavoidable.” More can be done and more details are mandated under CEQA—the only “when necessary” standard is not acceptable mitigation--proper mitigation is imperative to the quality of life and quiet enjoyment of the residents’ homes both during construction and then during operation of the ISLC.

45

Moreover, the Project Construction Schedule states that there “will be ‘pile driving’ on various portions of the ISLC site during the one-month duration of this phase.” Page 2.0-20 The construction noise attenuation needs particular details on how impacts to adjacent residential uses will be mitigated in more detail since as described above the fencing/walls are not addressed for the entire perimeter of the construction site where there are existing homes and operating businesses.

Public Safety

The City, including the Police Department and Public Works staff, have surveyed and monitored existing conditions for access, both pedestrian and vehicular, and on-site parking at LHSC and at South Gate Middle School, as well as at LAUSD's other local high schools South Gate High and Southeast High. These schools evidence a history of significant traffic counts, parking needs, and pedestrian congestion, even separate from drop-off and pick-up times such as for special events, sports, theatre, and open houses. The City's Police Department informs that there are real issues regarding traffic, access, and public safety at these schools, including the new LHSC. These same issues will exist in the operation of ISLC; in reality the environmental impacts to traffic, pedestrian safety and public safety must be addressed and mitigated by LAUSD in this DEIR.

46

As noted in the comments above related to pedestrian safety, under the DEIR LAUSD intends that Tweedy Boulevard remain as the main access point to ISLC (and LHSC). The DEIR ignores the likely use of other adjacent streets for cars and importantly for students walking to/from ISLC. One side of the new ISLC project site is located along Chakemco, but there is no discussion or even mention of the reality that students, as pedestrians, will be required to only use Tweedy when it is clearly foreseeable that students and visitors will inevitably use and walk on Chakemco to get to Atlantic. As mentioned, Chakemco is essentially an alley-type road; it is narrow, there is culvert running down the middle, there are NO sidewalks, so pedestrian safety is at-risk and cars will too try to bypass Tweedy to get to Atlantic, which is indeed a public safety issue. But, as noted, the DEIR essentially ignores the existence of Chakemco except as to the new three-way "Traffic Signal" at Atlantic/Chakemco/Wright. This Traffic Signal is clearly necessary as acknowledged in the DEIR, but with the Traffic Signal inevitably will more cars and nearby too students walking. NO improvements to Chakemco are proposed; this impact causes the DEIR to fail as a proper environmental assessment.

47

Further, the Police Department notes that the Los Angeles River pathways are known to be accessed and used by LHSC students, and in reality the LA River area is used by the general public including the homeless and persons at risk of homelessness. Students walk and bike along the top of the LA River pathways, so there should be discussion, analysis and mitigation measure related to safety of students and the public generally. The streets dead-end/cul-de-sac at the LA River so the DEIR should discuss potential for safety lighting, how the LA River area is accessed at beginning and end of school hours for safe passage and use by students. Will there be security gating preventing access to the LA River so students can safely access this pathway to/from the campus?

48

If LAUSD fails to address and mitigate, or otherwise compromise with the City, these important public safety, pedestrian safety impacts, especially sidewalks and street improvements to Chakemco that are necessitated only by completion of ISLC, along with LAUSD's statement in the DEIR that the District will resort to adoption of a statement of overriding considerations, notwithstanding the real need for sidewalks and street improvements to Chakemco that will significantly reduce these impacts and that are reasonably requested by the City in this letter. LAUSD cannot make a pre-judgment to undertake the Proposed Project regardless of the results of the environmental investigations and analysis conducted in connection with the DEIR, in violation of CEQA. LAUSD's apparent intention to override significant impacts without good faith consideration of reasonable and feasible mitigation measures evidences non-compliance, even bad faith non-compliance, with CEQA.

49

Lighted Regional Athletic Fields; Sporting and Community Events.

Contrary to the statements in the DEIR that all aspects of the proposed regional athletic fields were analyzed as part of the FEIR for LHSC; this is not true. The City objected in 2009 that the southern portion of that project included an area from Tweedy Boulevard to the southern boundary of the site for regional athletic fields both turf and hardcourt (referred to therein as the “Expanded Project”); the District punted, if you will, to a proper CEQA analysis of the uses within the Expanded Project to when this Proposed Project would be more fully analyzed under CEQA (albeit this piecemeal approach was contrary to Section 15082, subsections (a) and (c), of the Guidelines), but in any event LAUSD must now properly analyze and address the environmental impacts in this DEIR and the Final EIR for the Proposed Project.

50

The DEIR fails to accurately describe and study the environmental effects of the “regional athletic fields on the southern 16 acres” of LAUSD property. The DEIR in fact concedes that “[a] part of the Proposed Project, nighttime field lights would be added to the athletic fields planned for the southern portion of the LHSC campus”, and “funding is expected to be available to upgrade field lighting at the athletic fields”, which “lights would conform to the District’s Design Standards for field lighting.” But, NO noise, traffic, pedestrian safety or other impacts are evaluated, addressed or mitigated. The DEIR concedes that LAUSD should locate outdoor activity areas for schools, such as play grounds and sport fields, “away from residential areas” but does not address properly the impacts of the lighted athletic fields on the surrounding uses, especially the single-family Aldrich Road Residences.

The DEIR does not adequately address the impacts of the middle school operations in coordination with the adjacent athletic fields being developed; this causes the Proposed Project to take on a new and expanded role for this southern acreage. Clearly with the new added lighting improvements, the environmental effects on noise, air quality, parking, traffic and/or pedestrian safety must be evaluated, analyzed and mitigated. The DEIR is close to silent other than in the “Project” description. LAUSD must develop and commit to real operational plans to efficiently and safely address the impacts, such as circulation, parking, pedestrian safety, the neighboring residential uses, etc., for participants, visitors, and other patrons arriving and departing special events and the actual operation of these athletic and other events.

51

LAUSD *Standard Conditions* are included but not properly addressed or mitigated with specifics in the DEIR:

“Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.”

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“Implementation of SRTS, traffic control and pedestrian safety devices Traffic and pedestrian safety impacts studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events.”

Further, while the DEIR both concedes and “assumes implementation of playfields on the [ISLC] site” and that “[it] is likely that some accessory structures would be constructed (i.e., restrooms, bleachers, etc.)”--these improvements are not otherwise discussed or analyzed, or the environmental impacts mitigated. In all circumstances, accessible restrooms will be a necessary as patrons will not have access to the locked, fenced and gated ISLC main campus.

53

Public Services.

The following comments, including some objections, are provided related to Public Services. Several corrections to the DEIR are noted too, which may necessitate revisions in the DEIR that may require more analysis and mitigation:

1. Figure 3.0-1 map of related projects: Error--same address and location for two different projects. 9923 Atlantic should be 10000 Atlantic, which is a shopping center.
2. Page iii: Change LADOT to City of South Gate
3. The DEIR fails to study the effect of the on NPDES compliance.
4. The DEIR's failure to properly study or mitigate the impacts of ISLC on public services and/or infrastructure is further discussed below.
5. Page 2.0-28: Hydrology and Water Quality - Project must comply with LID Requirements.
6. Page 2.0-31: Change LADOT to City of South Gate, Department of Public Works.
7. Page 2.0-33: Water Supply – Shall be coordinated with City of South Gate, not LADWP.
8. Page 2.0-33: Fire Protection – Water service shall be coordinated with City of South Gate, not LADWP.
9. Page 2.0-35: Water Quality and Hydrology – EIR states “To accommodate the additional storm water runoff and annual water yield resulting from the construction, storm drain improvements shall provide capacity to carry 25-year peak runoff rates.” The City will require accommodation to 50-year peaks based on industry standards and weather patterns.
10. Page 2.0-35: Worksite traffic control plan shall require prior approval from City of South Gate.
11. Page 2.0-37: Sewer Service – Shall be coordinated with the City of South Gate.
12. Page 2.0-39: Page 3.5-8: AC-T-4 Change LADOT to City of South Gate.
13. Page 3.0-4: Change LADOT to City of South Gate.
14. Page 3.5-8: AC-T-4 Change LADOT to City of South Gate.

Overcrowding Effects.

Neither the DEIR nor supporting studies and appendices discuss the effects of likely overcrowding at ISLC in future years. LAUSD has a history of overcrowded schools, especially in the City of South Gate. Based on this relevant history, it is more than likely that ISLC will become overcrowded.

As an example, LAUSD's South East High School/South East Middle School located in South Gate opened in 2005-06. It was designed for a maximum of 2,475 students on a single track. (Exh. I, South East High School EIR, p. ES-4.) In the 2008-09 school year, fewer than five years after the high school's doors opened, South East High School is more than 10% over its maximum capacity, having 2,817 students on a single track. (Exh. J.)

LAUSD's failure to adequately study the actual uses to which it puts its facilities is further demonstrated by its conduct regarding the existing operation of the International Studies Learning Center at another LAUSD school site in the City of South Gate. This LAUSD school site was planned and studied as a continuation high school located immediately south of the South East High School campus. (Exh. I.) As stated in the EIR for the continuation high school, the campus was planned and studied to have six (6) classrooms and serve approximately 87 students with a maximum capacity of 120 students. (Exh. I.) Instead, this campus has become the LAUSD International Studies Learning Center with grades 6 through 12 and *now enrolled with 760 students, not the planned 87-120 students.* (Exh. Y.) In fact, during the 2015-2016 school year, *868 middle and high school students attended ISLC*, including 408 students in 6th, 7th, and 8th grades, and 460 students in 9th through 12th grades. The DEIR's failure to adequately study or mitigate the effects of likely overcrowding at ISLC establishes an inadequate DEIR under CEQA.

55

Aesthetics and Residential Buffer.

The DEIR must state that the Proposed Project's development site perimeter enclosures shall be approved by the City. The DEIR describes chain link fencing to be installed along the faculty and staff parking lot and the basketball and volleyball courts (along the eastern and southern perimeters); and, wrought iron fencing to be installed and buffered with landscaping, including hedges and trees, along the western boundary of the ISLC site. The City asserts that either or a combination of wrought iron fencing with appropriate landscaping or decorative walls are *necessary as an aesthetic and noise buffer to all adjacent uses*, in particular the residential uses on Aldrich. Further, the type and extent of fencing/walls/landscaping needs further details and these statements must be changed to actual commitments and must be fully incorporated as mitigation measures to buffer the nearby existing residential and business uses.

56

Hazardous Materials Section 3.3.

The DEIR further fails to require mitigation to comply with California Regional Water Quality Control Board ("RWQCB") requirements mandating a Stormwater Pollution Prevention Plan for construction sites disturbing one acre or more of soil, including post-construction stormwater treatment controls. These treatment controls must include provisions for minimizing the amount of runoff. In addition the RWQCB requires that any new parking lots over 5,000 square feet and associated new construction have post-construction treatment controls. Acceptable treatment

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Mr. Edward S. Paek, AICP
CEQA Project Manager
Los Angeles Unified School District
May 22, 2017
Page 14

controls include: (1) infiltration, (2) biofiltration and/or (3) capture and reuse. These controls must be designed to capture the first ¾ inch of rainfall from each storm or the continuous runoff from a 0.2 inch per hour storm. A (Standard) Urban Stormwater Mitigation Plan (“SUSMP”) must be developed and approved. The Los Angeles River, into which all runoff from this site will eventually flow, is currently subject to strict numerical limitations for pollutions such as: trash and litter; the heavy metals copper, cadmium, lead and zinc; and nutrients. Bacterial limitations are expected in the near future. The DEIR must include mitigation measures for these pollutants.

57

We thank you for the opportunity to provide comments and objections to the DEIR during the 45-day review period and hope you will consider the City’s concerns in good faith prior to certifying the DEIR for the Project. If you have questions, please contact Arturo Cervantes, P.E., Director of Public Works /City Engineer or LAUSD counsel may contact the undersigned.

Respectfully submitted,

STRADLING YOCCA CARLSON & RAUTH

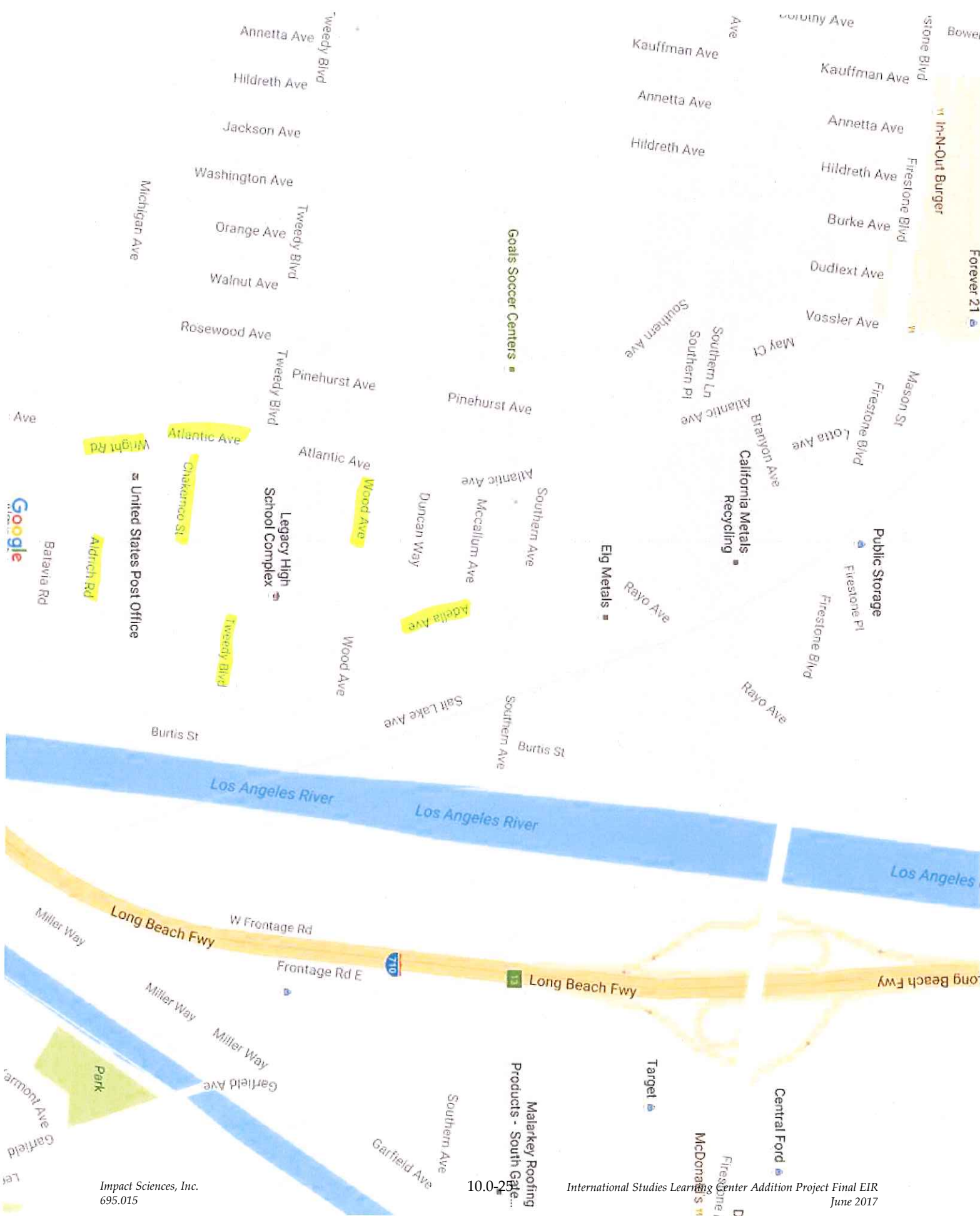


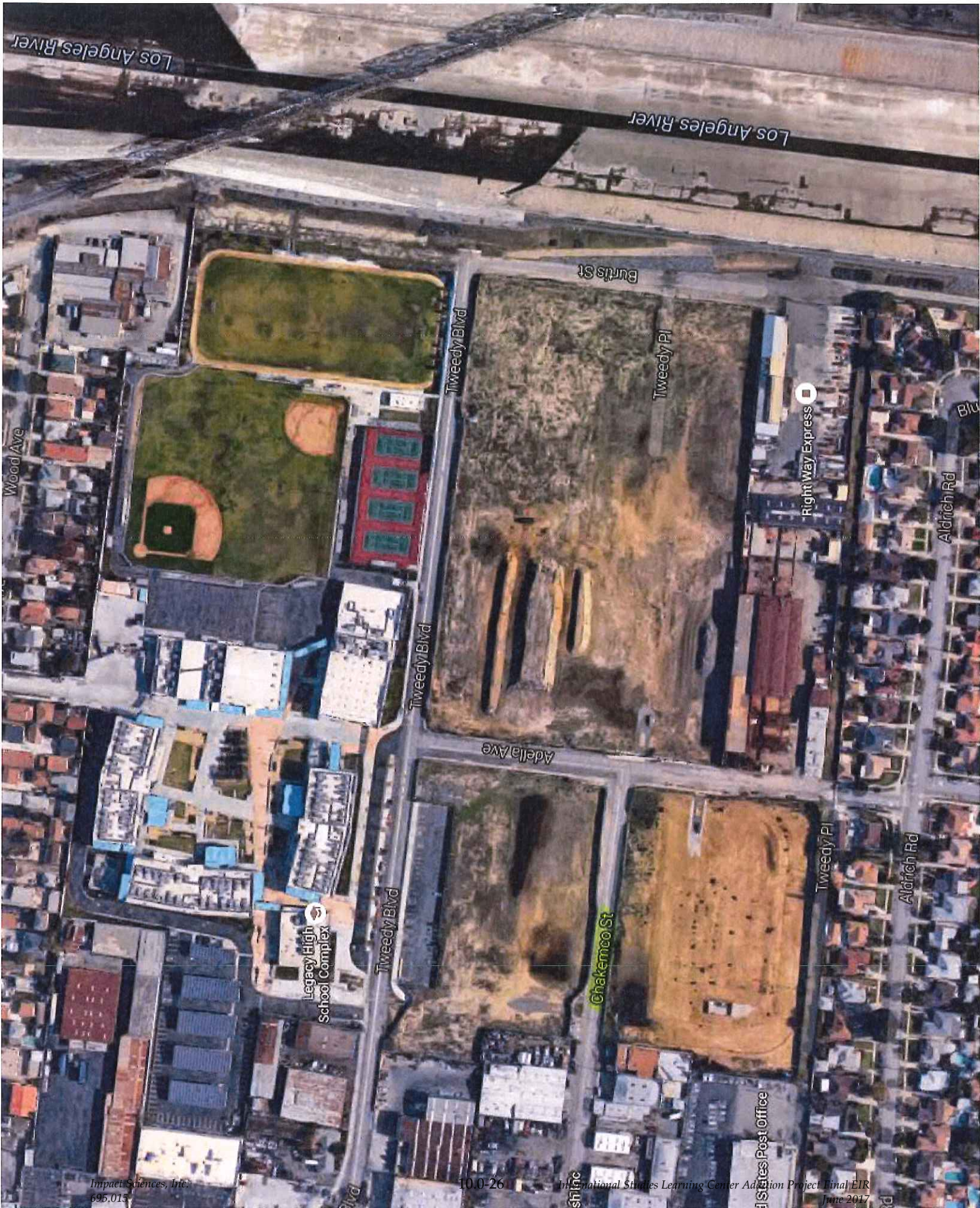
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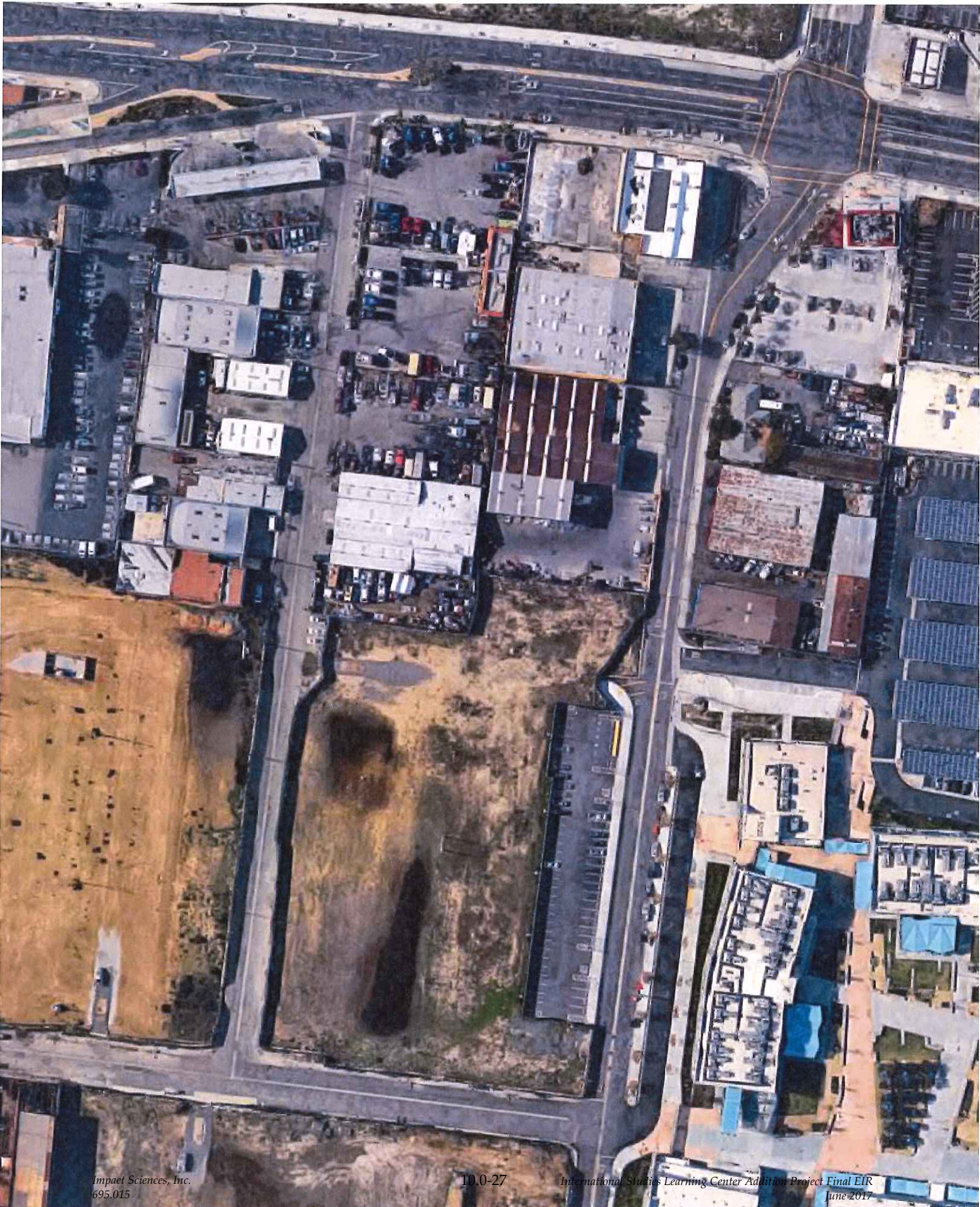
cc: Michael Flad, City Manager
Arturo Cervantes, Director of Public Works/City Engineer
Joe Perez, Director of Community Development
Paul Adams, Director of Parks and Recreation
Raul Salinas, Esq., City Attorney
(all copies transmitted via email)

Referenced Maps, Photos And Letter From Padres Unidos De South Gate

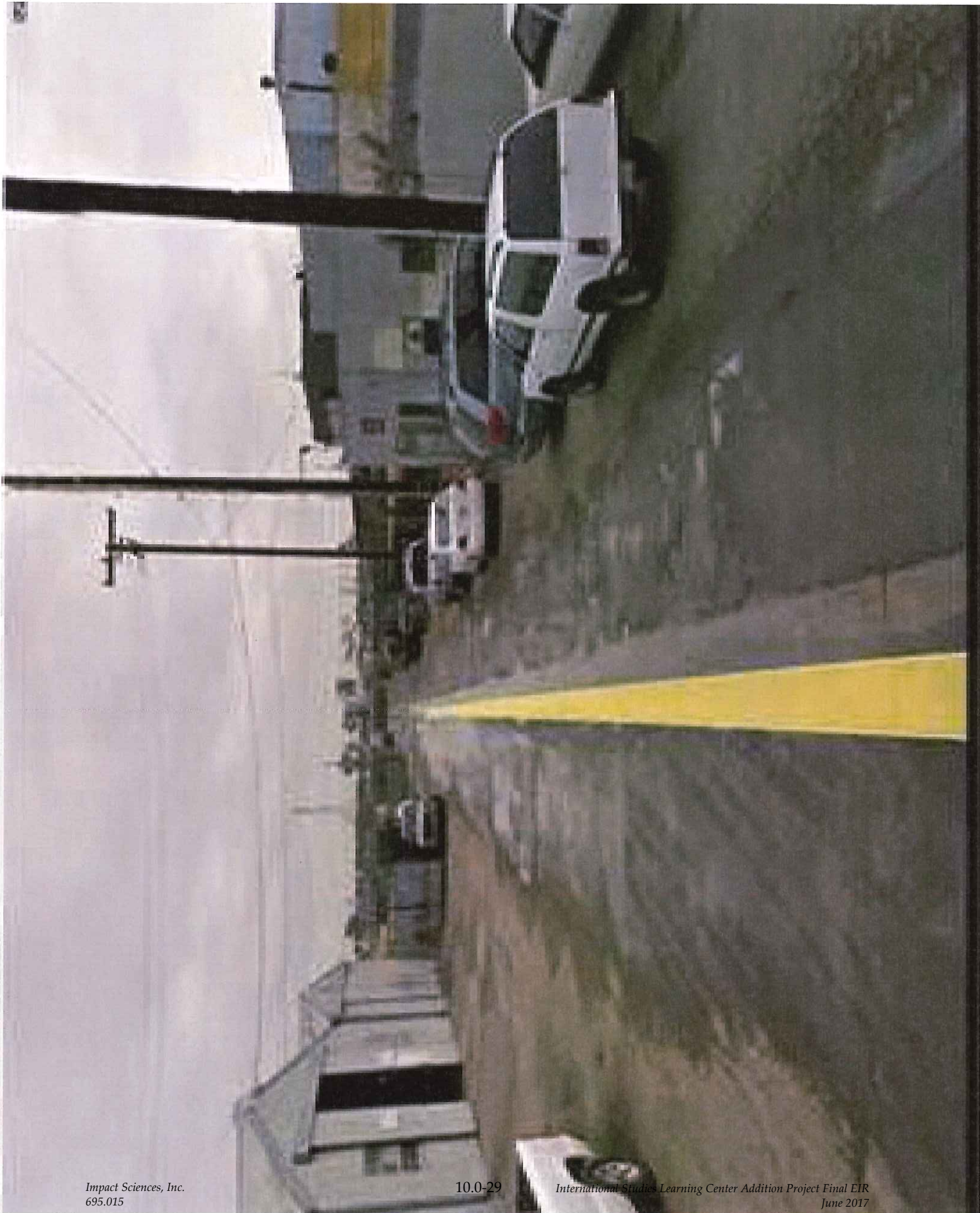
(Attached)











Padres Unidos de South Gate

Dr. Ref Rodriguez, LAUSD Board Member
333 S. Beaudry Ave. 24th Floor
Los Angeles, CA 90017
(213)241-6389

May 19, 2017

RE: International Studies Learning Center Middle School

Dear Dr. Rodriguez,

Padres Unidos de South Gate respectfully requests your attention to the community concerns with the traffic impact on Tweedy Blvd. and Atlantic Ave. in South Gate. During the meetings for both Legacy High School and International Studies Learning Center Middle School we have stated that we welcome the new school in our community to alleviate overcrowding in South Gate M.S. but we would like Tweedy Blvd. to be widened at that intersection to facilitate access to both campuses. Currently, the information we have been presented with states that a two lane street with a roundabout would be sufficient for both parents and staff to enter through Legacy Lane. We have suggested widening Tweedy Blvd. to allow for 3 lanes instead of 2, and opening another entrance off of Chakemco Street for staff to access the campus parking lot.

In addition to the daily access our students and staff need, we also need to consider the proximity of the L.A. River and the possibility of an emergency. If deemed necessary to evacuate both campuses, a 3 lane boulevard would facilitate the process; and an additional exit off of Chakemco would alleviate the traffic flow for staff on to Atlantic.

As a community we are also promoting healthier more environmentally friendly habits, such as walking, and biking to school. We have green pathways and bike lanes throughout South Gate already, and would like to see a lane for bikes to access ISLC Middle School. This would result in fewer vehicles on Tweedy Blvd. and Atlantic Ave. At this moment about 10% of our students, bike to Legacy H.S., which indicates that the trend can be expected to increase when ISLC Middle School students begin to attend the new campus across the street. We were informed that a traffic study was performed by an outside agency contracted by LAUSD, and we wonder if they noticed the existing bike lanes in the city of South Gate, and the proximity of the River bike lanes immediately next to the proposed campus site.

We hope that our concerns, needs, and suggestions will be considered by your wonderful team and other colleagues. As always, it is a pleasure to have your support and advocacy for safer environments conducive to learning. We welcome any and all efforts to demonstrate our support of this and other LAUSD projects, and understand that working together we can achieve our goal of 100% graduation.

Our deepest gratitude for your attention to this matter, and for your continued support for the city of South Gate.

Sincerely,

Padres Unidos de South Gate
Ivonne Loucel, President ixl9483@lausd.net

Maria Parra, Board Member maria.parra@lausd.net

Cc:

Dr. Michelle King, LAUSD
Mark Hovara, LAUSD
Jose Huerta, LAUSD

Letter Number A2: City of South Gate

Stradling Attorneys at Law
Stradling Yocca Carlson & Rauth, P.C.
660 Newport Center Drive, Suite 1600
Newport Beach, CA 92660-6422

Response A2-1

The comment provides introductory information related to the City's position on the proposed Project. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response A2-2

The comment provides a summary of the components of the proposed Project as provided in the DEIR Project Description. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response A2-3

The comment provides general objections to the Project. This commenter's comments that raise specific environmental concerns or impacts are responded to as appropriate below.

Response A2-4

LAUSD has in good faith made every reasonable effort to work with the City of South Gate to identify and mitigate potential significant impacts. As part of its early consultation efforts recommended by CEQA, LAUSD met in-person with representatives from the City of South Gate on five (5) occasions, in addition to numerous e-mails and phone calls, to specifically to determine the scope of the traffic and pedestrian safety analysis, identify potential impacts, and discuss reasonable and feasible mitigation measures. Key meeting and correspondence dates, as well as a synopsis of the topics discussed, are provided below. Minutes from the meetings are provided in Appendix 10.0-1 of this FEIR.

- September 14, 2015 – LAUSD provides City of South Gate with preliminary traffic study scoping document.
- October 27, 2015 – Meeting with the City of South Gate to discuss the scope of the traffic study.
- November 9, 2015 – LAUSD provides updated traffic study scoping document to the City of South Gate.

- April 19, 2016 – Meeting with the City of South Gate to discuss preliminary findings of the traffic study, as well as possible mitigation measures.
- May 17, 2016 – Meeting with the City of South Gate to discuss traffic mitigation. City agreed on traffic signalization mitigation for impact at Atlantic Avenue/Chakemco Street. LAUSD to start conceptual design. Also discussed the possibility of opening the Adella Avenue entrance to the north.
- August 8, 2016 – City of South Gate provides comment letter on the Initial Study.
- October 11, 2016 – Meeting with the City of South Gate to discuss the conceptual traffic signalization plan developed by LAUSD.
- November 9, 2016 – E-mail from the City of South Gate indicating its support implementing the conceptual signalization plan for the intersection of Atlantic Avenue/Chakemco Street.
- December 8, 2016 – LAUSD would be willing to implement the mitigation and enter into a Memorandum of Understanding (MOU) with the City. However, as neither the City nor LAUSD could assure that the signalization plan would be constructed prior to the opening of the ISLC, the impact would remain significant and unavoidable. (See DEIR section 3.6 Transportation pages 3.6-49 and 3.6-50 for discussion of the potential for an memorandum of understanding between the City and LAUSD.
- February 27, 2017 – LAUSD provided the City of South Gate an advance copy of the Draft EIR for preliminary review and comment. After multiple attempts to schedule an in-person meeting and conference call to discuss City comments, no feedback was received.

The scope of the traffic analysis undertaken by LAUSD and its consultant, KOA Corporation, was determined in consultation with the City of South Gate and memorialized in a scoping document dated September 14, 2015 and subsequently revised on November 9, 2015 based on comments received from the City. The scoping document was created as a good faith effort to document major assumptions and set the parameters of the traffic study performed for the proposed Project.

LAUSD again consulted with the City once the traffic study was completed, providing an advance copy of the study and meeting with the City to discuss the findings. After discussions regarding the feasibility of implementing the Atlantic Avenue/Chakemco Street mitigation measure in the form of a traffic signal and related improvements, LAUSD and the City agreed that this mitigation was necessary and determined that a Memorandum of Understanding (MOU) between LAUSD and the City would be the appropriate vehicle for implementation (see email documentation provided in **Appendix 10.0-1**). At no point during these discussions did the City express concerns regarding potential significant impacts at other locations or mitigation measures associated with the proposed Project. LAUSD proceeded with preparation of the EIR and evaluated air quality, geology, hazards, noise, pedestrian safety, traffic, and energy in accordance with the CEQA Guidelines.

When negotiating the terms of the MOU, the City of South Gate and LAUSD understood that this City would not likely acquire the property interests or process the permits needed for the proposed traffic signal and related improvements within a time that would allow the completion of this mitigation measure before the proposed Project begins operating. These actions are within the control and responsibility of the City of South Gate, not LAUSD. As a result the traffic and pedestrian safety impacts that this measure will mitigate to insignificance will be significant and unavoidable at the commencement of the proposed Project, even though these impacts will be mitigated to insignificance once the traffic signal improvements are completed. The City of South Gate has also been aware of these considerations.

Response A2-5

LAUSD has in good faith made every reasonable effort to work with the City of South Gate to identify and mitigate potential significant impacts. As part of its early consultation efforts recommended by CEQA, LAUSD met in-person with representatives from the City of South Gate on five (5) occasions, in addition to numerous e-mails and phone calls, to specifically to determine the scope of the traffic and pedestrian safety analysis, identify potential impacts, and discuss reasonable and feasible mitigation measures. Key meeting and correspondence dates, as well as a synopsis of the topics discussed, are provided below. Minutes from the meetings are provided in Appendix 10.0-1 of this FEIR.

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- December 8, 2016 – LAUSD would be willing to implement the mitigation and enter into a Memorandum of Understanding (MOU) with the City. However, as neither the City nor LAUSD could assure that the signalization plan would be constructed prior to the opening of the ISLC, the impact would remain significant and unavoidable. (See DEIR section 3.6 Transportation pages 3.6-49 and 3.6-50 for discussion of the potential for an memorandum of understanding between the City and LAUSD.
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LAUSD again consulted with the City once the traffic study was completed, providing an advance copy of the study and meeting with the City to discuss the findings. After discussions regarding the feasibility of implementing the Atlantic Avenue/Chakemco Street mitigation measure in the form of a traffic signal and related improvements, LAUSD and the City agreed that this mitigation was necessary and determined that a Memorandum of Understanding (MOU) between LAUSD and the City would be the appropriate vehicle for implementation (see email documentation provided in **Appendix 10.0-1**). At no point during these discussions did the City express concerns regarding potential significant impacts at other locations or mitigation measures associated with the proposed Project. LAUSD proceeded with preparation of the EIR and evaluated air quality, geology, hazards, noise, pedestrian safety, traffic, and energy in accordance with the CEQA Guidelines.

When negotiating the terms of the MOU, the City of South Gate and LAUSD understood that this City would not likely acquire the property interests or process the permits needed for the proposed traffic signal and related improvements within a time that would allow the completion of this mitigation measure before the proposed Project begins operating. These actions are within the control and responsibility of the City of South Gate, not LAUSD. As a result the traffic and pedestrian safety impacts that this measure will mitigate to insignificance will be significant and unavoidable at the commencement of the proposed Project, even though these impacts will be mitigated to insignificance once the traffic signal improvements are completed. The City of South Gate has also been aware of these considerations.

As stated in the Mitigation Monitoring and Reporting Plan (MMRP) and above, LAUSD shall enter into a MOU with the City for implementation of mitigation measure to reduce significant impacts at Atlantic Avenue/Chakemco Street intersection.

Response A2-6

The comment provides a summary of the components of the Project as provided in the DEIR Project description. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response A2-7

Responses to Padres Unidos de South Gate are provided in Comment Letter B1. The City provided a similar comment on the EIR for South Region High School #9 (SRHS #9). As detailed in the Final Recirculated EIR for SRHS#9, widening of Tweedy Boulevard, as has been requested by the City was determined to be infeasible due to the configuration of adjacent properties and the need to acquire additional right of way. The City's comment letter on SRHS #9 and LAUSD's responses to those comments is provided in Appendix 10.0. Further, the South Region High School Recirculated EIR is incorporated by reference into this document and attached as Appendix 10.0 to the EIR. Regarding the request to provide access from Chakemco Street, the staff parking is accessible via Legacy Lane. Chakemco Street is proposed to remain open and therefore could be used by staff. The commenter also cites a need for improved bicycle and pedestrian access. A safe pedestrian route will be provided via Tweedy Boulevard. Therefore, an additional pedestrian route is not necessary or required.

A bike path currently exists and is in use by LHSC students. This condition would remain unchanged with the proposed Project, and the bike path would also serve ISLC students. In addition, although Legacy Lane is not proposed to have a dedicated bike lane, the street would be wide enough to safely accommodate bicyclists and would be implemented as a Class III bikeway. The plans for the Construction of Street Improvements on Legacy Lane (City Project No. 519-ST) were approved by the City of South Gate on January 5, 2016. The Class III Bike Street is only a designation, necessitating signage and pavement markings. It is not a physical bike path. The Traffic Study for the Project made the following determination after review of all local facilities: all local pedestrian routes have adequate sidewalk facilities. This study does not identify any specific impacts that would require additional bicycle facilities. (See Appendix 3.5 of the DEIR) The City's Bicycle Plan includes the connection from Tweedy Boulevard to the LA River bike path to Burtis Street. More specifically, the Mobility Plan for the City of South Gate includes a Bicycle Plan (page 166 of General Plan; Page 24 of 72 of Mobility Element).

It depicts (the then proposed, now under construction) Legacy Lane as a Class III Bike Street. The Mobility Element also defines Legacy Lane as a Class III Bike Street described therein as "New street connections from Tweedy Boulevard just east of Atlantic Avenue to the Los Angeles River" on Page 167 of the General Plan and Page 25 of 72 of the Mobility Element. A Class III Bike Street is a signed street providing for shared use of a street by motor vehicles and bicyclists. While bicyclists have no exclusive use or priority, the signage (both by the side of the street and stenciled on the roadway surface) warns motorists of bicyclists sharing the roadway space. The plans for the construction of Street Improvements on Legacy Lane (City Project No. 519-ST) were approved by the City of South Gate on January 5, 2016. This bicycle path would also serve the ISLC addition Project. Section 3.5 of the DEIR evaluates potential pedestrian safety impacts and provides information on existing pedestrian facilities.

Response A2-8

The DEIR acknowledges as a result of the Project a significant and unavoidable cumulative traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. This impact could be mitigated with implementation of the proposed traffic signal. However, as stated in the DEIR (Section 3.6, page 3.6-50) the identified cumulative impact would remain significant unless the signalization of the Atlantic Avenue/Chakemko Street intersection, identified in Mitigation Measure MM-TRA-1, occurs prior to the opening of the proposed school. The traffic signals and associated improvements, including installation of signage and curb ramps, require approval by the City of South Gate. Discussions between LAUSD and the City indicate that these improvements are not likely to be approved and installed prior to the proposed school's opening. If the Project is approved, LAUSD plans to complete construction of the Project by August 2019 and commence operation by September 2019. Representatives of LAUSD's Facilities Services Division and the City's Engineering and Public Works Departments have crafted the MOU as the means by which LAUSD would fund these improvements and the City would acquire property interests (if necessary) and approve permits needed for the improvements. The City of South Gate and LAUSD have understood that this City would not likely acquire the property interests or process the permits needed for the proposed traffic signal and related improvements within a time that would allow the completion of this mitigation measure before the proposed Project begins operating. . . These actions are within the control and responsibility of the City of South Gate, not LAUSD. As a result LAUSD cannot ensure that the signalization plan improvements would be completed prior to the school's opening. Thus, the Project's traffic impacts on the Atlantic Boulevard and Chakemco Street intersection would result in a significant and unavoidable cumulative traffic impact upon commencement of the proposed Project's operations.

Therefore, due to the uncertainty of LAUSD to implement the proposed mitigation in the necessary timeframe, the cumulative impact at the intersection of Atlantic Avenue and Chakemco Street is found to remain significant and unavoidable.

Response A2-9

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

Limited Vehicular Access. Vehicular access to the School Project from Adella Avenue on the north shall only be available to the following persons for the following purposes (a) delivery trucks and other service vehicles to the cafeteria and maintenance/janitorial service areas for HS #9 (b) trash/refuse trucks to access the refuse area located adjacent to the north entrance to the School Project in the area devoted for trash collection; (c) repair and service trucks and vehicles for authorized work at HS#9; (d) vehicles for faculty, staff, administration employees, and authorized substitutes who will be authorized to park in the 133-space faculty/staff/administration parking lot; and (e) two (2) low capacity buses (20 feet or shorter) that transport special needs students to and from the School Project (together "Authorized Adella Users")

Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

Response A2-10

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via

Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the reasons stated below. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore could be used by staff.

1. A safe pedestrian route will be provided via Tweedy Boulevard, which will have sidewalks on both sides of the street and provide the most direct route to the main entrance of the proposed ISLC campus. Additionally, students who live in the residential area to the south of the proposed ISLC will be able to access the newly constructed Legacy Lane via Adella Avenue (just north of Aldrich Road), which will be closed off to vehicular access, but remain open for pedestrian access. Legacy Lane will be improved with sidewalks on both sides and provide safe and direct

access to ISLC's main entrance on Tweedy Boulevard. Therefore, an additional pedestrian route on Chakemco Street is not necessary or required.

2. Chakemco Street is the primary access for existing businesses along Chakemco, as well as businesses along Legacy Lane; as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement. For example, the property acquisition and design approval process required to construct the sidewalk on the south side of Tweedy Boulevard has taken approximately 5 years, with construction finally slated to begin this year.

Response A2-11

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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space faculty/staff/administration parking lot; and (d) two (2) low capacity buses (20 feet or shorter) that transport special needs students to and from the School Project (together “Authorized Adella Users”)

Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time. LAUSD’s position is Chakemco Street is unsafe for pedestrian access even with the City’s suggested improvements. This position is based on the facts stated in this Response.

Response A2-12

See DEIR page 3.6-5 and page 3.6-6 for a description of existing conditions on Chakemco Street. LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD’s MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time. LAUSD’s position

is Chakemco is unsafe for pedestrian access even with the City's suggested improvements. This position is based on the facts stated in Response A2-9 and Response A2-10. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Response A2-13

As stated in DEIR Section 3.5 Pedestrian Safety, Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position based on facts provided in the Record is Chakemco is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Response A2-14

As stated in DEIR Section 3.5 Pedestrian Safety, Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position based on facts provided in the Record is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Response A2-15

The comment includes a restatement of LAUSD Standard Conditions. As stated in Section 3.5 Pedestrian Safety of the DEIR, LAUSD will comply with the conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. As stated in Section 2.0 (DEIR, page 2.0-9 and 2.0-10), Tweedy Boulevard will be widened to include a sidewalk on the south side of the street and will be turned into a cul-de-sac where it currently intersects with Adella Avenue. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position based on facts provided in the record is Chakemco Street is unsafe for pedestrian access. These improvements are expected to be completed prior to the completion of construction of the proposed Project. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Response A2-16

LAUSD will provide safe pedestrian routes to the proposed Project as described in the DEIR Section 3.5 Pedestrian Safety. See Responses A2-7 and A2-9 through A2-15 above regarding LAUSD's efforts to provide necessary infrastructure for safe pedestrian and bike access to the Project.

Response A2-17

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the following reasons:

1. A safe pedestrian route will be provided via Tweedy Boulevard therefore, an additional pedestrian route is not necessary or required.

2. Chakemco Street is the primary access for existing businesses, as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement.

As stated in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

LAUSD has identified a mitigation measure for the cumulative intersection impact at Atlantic Avenue and Chakemco Street. No additional intersection impacts were identified that would require mitigation. LAUSD has identified safe pedestrian routes via Tweedy Boulevard and Adella Street (on the south). LAUSD has not identified any significant impacts related to pedestrian safety. No additional improvements are necessary or required for Chakemco Street.

Response A2-18

The comment concerns two issues: (1) conformity of the pedestrian facilities to those required by the City's General Plan and (2) the adequacy of the pedestrian facilities proposed in the DEIR. As stated in DEIR Section 3.5 Pedestrian Safety, Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position based on facts provided in the Record is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Daytime use and access to the athletic fields was evaluated as part of the SRHS #9 EIR. See Chapter 3F Pedestrian Safety of the SRHS #9 EIR. Nighttime use of the athletic fields is expected to occur as a result of the inclusion of nighttime lighting for the Project. Pedestrian access will include lighting in accordance with LAUSD Standards. As stated in the School Upgrade Program EIR, Page 5.13-11, "all projects

implemented pursuant to the SUP would implement LAUSD Standards, including SR2S Program; School Design Guide; Traffic Safety Reference Guide; OEHS CEQA Specification Manual, Appendix C, Traffic and Pedestrian Safety Requirements for New School and Appendix D, Sidewalk Requirements for New Schools.” As stated in the comments, a sidewalk on the south side of Tweedy Boulevard to the west of the Project site (between Legacy Lane and Atlantic Avenue) is currently under construction by LAUSD and will be completed by the time the Project is constructed. This new sidewalk will avoid a condition where all student pedestrians would need to cross Tweedy Boulevard to access the ISLC campus, avoiding potential for delay in inbound and outbound vehicle traffic for both schools and avoiding vehicle/pedestrian conflicts. In case the new sidewalk is not constructed by the time the Project is constructed, LAUSD will request that the City of South Gate provide crossing guards for north-south pedestrian crossing at the Tweedy Boulevard/Legacy Place site intersection, to provide balance between vehicle inbound and outbound movements and pedestrians (See DEIR Section 3.5 Pedestrian Safety page 3.5-10). Furthermore, the Project’s pick up and drop off operations have been designed to accommodate existing, adjacent uses and enhance pedestrian safety along Tweedy Boulevard. As required by Standard Condition SC-T-3, all local pedestrian routes will have adequate sidewalk facilities, per LAUSD and City of South Gate design standards. Regarding consistency with the City’s General Plan, the Mobility Element of the General Plan states:

“Pedestrian circulation should be enhanced through appropriate consideration of sidewalk widths in an update of the street design standards, and include the provision of good pedestrian facilities and amenities, to provide options for alternate modes of travel in the City”

The Project is consistent with this statement as it would provide adequate pedestrian facilities along Tweedy Boulevard. In addition, Legacy Lane will also be improved with a connection to Adella Street to allow safe pedestrian access. The plans for the construction of Legacy Lane have been approved by the City. LAUSD’s position, based on facts provided in the Record, is Chakemco Street is unsafe for pedestrian access even with the City’s suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

Response A2-19

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students,

the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

Limited Vehicular Access. Vehicular access to the School Project from Adella Avenue on the north shall only be available to the following persons for the following purposes (a) delivery trucks and other service vehicles to the cafeteria and maintenanceljanitorial service areas for HS #9 (b) trash/refuse trucks to access the refuse area located adjacent to the north entrance to the School Project in the area devoted for trash collection; (c) repair and service trucks and vehicles for authorized work at HS#9; (d) vehicles for faculty, staff, administration employees, and authroized substitutes who will be authorized to park in the 133-space faculty/staff/administration parking lot; and (d) two (2) low capacity buses (20 feet or shorter) that transport special needs students to and from the School Project (together "Authorized Adella Users")

Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the following reasons:

1. A safe pedestrian route will be provided via Tweedy Boulevard therefore, an additional pedestrian route is not necessary or required.
2. Chakemco Street is the primary access for existing businesses, as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement.

As stated in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

LAUSD has identified a mitigation measure for the cumulative intersection impact at Atlantic Avenue and Chakemco Street. No additional intersection impacts were identified that would require mitigation. LAUSD has identified safe pedestrian routes via Tweedy Boulevard and Adella Street (on the south). LAUSD has not identified any significant impacts related to pedestrian safety. No additional improvements are necessary or required for Chakemco Street.

Response A2-20

Page 3.5-1 of the DEIR merely presents the existing condition of Chakemco Avenue as having no sidewalks. Further, LAUSD's position, based on facts provided in the Record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City. As stated in Section 3.5.4, under the Safe Route to School program, LAUSD needs to determine whether adequate walkways and sidewalks are provided along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. As LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map, LAUSD need not "resolve and mitigate" the existing conditions on Chakemco Street.

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff.

Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the following reasons:

1. A safe pedestrian route will be provided via Tweedy Boulevard therefore, an additional pedestrian route is not necessary or required.
2. Chakemco Street is the primary access for existing businesses, as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement.

As stated in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided

in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

LAUSD has identified a mitigation measure for the cumulative intersection impact at Atlantic Avenue and Chakemco Street. No additional intersection impacts were identified that would require mitigation. LAUSD has identified safe pedestrian routes via Tweedy Boulevard and Adella Street (on the south). LAUSD has not identified any significant impacts related to pedestrian safety. No additional improvements are necessary or required for Chakemco Street.

Response A2-21

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

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Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the following reasons:

1. A safe pedestrian route will be provided via Tweedy Boulevard therefore, an additional pedestrian route is not necessary or required.
2. Chakemco Street is the primary access for existing businesses, as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement.

As stated in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

LAUSD has identified a mitigation measure for the cumulative intersection impact at Atlantic Avenue and Chakemco Street. No additional intersection impacts were identified that would require mitigation. LAUSD has identified safe pedestrian routes via Tweedy Boulevard and Adella Street (on the south). LAUSD has not identified any significant impacts related to pedestrian safety. No additional improvements are necessary or required for Chakemco Street.

Page 3.5-1 of the DEIR merely presents the existing condition of Chakemco Avenue as having no sidewalks. Further, LAUSD's position, based on facts provided in the Record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City. As stated in Section 3.5.4, under the Safe Route to School program, LAUSD needs to determine whether adequate walkways and sidewalks are provided along the paths of identified

pedestrian routes within a 0.25 mile radius of a proposed school site. As LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map, LAUSD need not “resolve and mitigate” the existing conditions on Chakemco Street.

Response A2-22

Page 3.5-1 of the DEIR merely presents the existing condition of Chakemco Avenue as having no sidewalks. Further, LAUSD’s position, based on facts provided in the Record, is Chakemco Street is unsafe for pedestrian access even with the City’s suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City. As stated in Section 3.5.4, under the Safe Route to School program, LAUSD needs to determine whether adequate walkways and sidewalks are provided along the paths of identified pedestrian routes within a 0.25 mile radius of a proposed school site. As LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map, LAUSD need not “resolve and mitigate” the existing conditions on Chakemco Street.

LAUSD examined potential access points to the Project in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. However, the staff parking is accessible via Legacy Lane, which in turn would connect to Chakemco Street as well. Chakemco Street is proposed to remain open and therefore, could be used by staff. Additional access points that were also considered for the proposed Project include Wood Avenue on the north. However, based on LAUSD’s MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. MOU subpart F relates to the use of Adella Avenue and states:

Limited Vehicular Access. Vehicular access to the School Project from Adella Avenue on the north shall only be available to the following persons for the following purposes (a) delivery trucks and other service vehicles to the cafeteria and maintenanceljanitorial service areas for HS #9 (b) trash/refuse trucks to access the refuse area located adjacent to the north entrance to the School Project in the area devoted for trash collection; (c) repair and service trucks and vehicles for authorized work at HS#9; (d) vehicles for faculty, staff, administration employees, and authroized substitutes who will be authorized to park in the 133-space faculty/staff/administration parking

lot; and (d) two (2) low capacity buses (20 feet or shorter) that transport special needs students to and from the School Project (together "Authorized Adella Users")

Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

The DEIR acknowledges that as a result of the Project a significant and unavoidable traffic impact would occur at the intersection of Atlantic Avenue and Chakemco Street. Based on facts provided in the DEIR (See Section 3.9 Traffic), additional access points are not necessary or feasible. LAUSD has evaluated Chakemco Street to provide access to the school and has determined it to be infeasible for the following reasons:

1. A safe pedestrian route will be provided via Tweedy Boulevard therefore, an additional pedestrian route is not necessary or required.
2. Chakemco Street is the primary access for existing businesses, as such, routing pedestrians along this route has the potential to result in pedestrian/vehicle conflicts, particularly with the large trucks that access the existing Chakemco Street businesses. Businesses that remain on Chakemco Street would not be restricted from crossing the sidewalks (where students would be walking) to access their businesses. This would create a hazard more significant than the conditions proposed by the proposed Project.
3. Improvements to Chakemco Street would also require acquisition of private property. Property acquisition is a complicated process that often takes years to complete and would not be likely to occur in the timeframe of the proposed Project opening. Acquisition of private property would also be expensive, further adding to the overall cost of the suggested improvement.

As stated in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City.

LAUSD has identified a mitigation measure for the cumulative intersection impact at Atlantic Avenue and Chakemco Street. No additional intersection impacts were identified that would require mitigation. LAUSD has identified safe pedestrian routes via Tweedy Boulevard and Adella Street (on the south). LAUSD has not identified any significant impacts related to pedestrian safety. No additional improvements are necessary or required for Chakemco Street.

Section 3.5 of the EIR already addresses the impacts associated with pedestrian safety and pedestrian access for the Project

Response A2-23

The commenter states an objection as to the lack of bike paths providing access to the Project site. A bike path currently exists and is in use by LHSC students, this condition would remain with the Project. In addition, although Legacy Lane is not proposed to have a dedicated bike lane, the street would be wide enough to safely accommodate bicyclists and would be implemented as a Class III bikeway, as provided in the City approved Legacy Lane construction plans. The City's Bicycle Plan includes the connection from Tweedy Boulevard to the LA River bike path to Burtis Street. This bicycle path would also serve the ISLC addition Project.

Response A2-24

Students walking to the school from the south would be expected to travel through the residential neighborhoods and on to the new Legacy Lane. Legacy Lane would provide a safe pedestrian environment as it would be improved with 10 foot sidewalks and maintain a 60 foot width. The City has placed a large concrete k-rail at the end of Aldrich Road to restrict vehicle access, which would only be removed at the discretion of the City. As provided in the Draft EIR, page 3.5-10 in Standard Condition SC-T-3, LAUSD has committed to the following Project procedures to ensure pedestrian safety:

- LAUSD shall coordinate with the City of South Gate to install appropriate traffic controls, school warning and speed limit signs, school crosswalks and pavement markings. LAUSD shall install these improvements with the site improvements.
- LAUSD shall coordinate with the City of South Gate to prepare a "Pedestrian Routes to School" map. This map would provide a final adopted pedestrian route network, with indications for both sides of each included roadway. As part of the "Pedestrian Routes to School" map, parents and students should be notified to use the existing controlled intersections as crossing points. LAUSD shall conduct these actions with the completion of site improvements.
- LAUSD shall coordinate with the City of South Gate to install signs for the area of transition between the public roadway of Tweedy Boulevard and the on-site pick-up/drop-off area. The locations of prohibited on-street parking areas adjacent to the campus should be determined during that coordination effort. LAUSD shall conduct these actions with the completion of site improvements.

A bike path currently exists and is in use by LHSC students. This condition would remain unchanged with the proposed Project, and the bike path would also serve ISLC students. In addition, although Legacy Lane is not proposed to have a dedicated bike lane, the street would be wide enough to safely accommodate bicyclists and would be implemented as a Class III bikeway. The plans for the Construction of Street Improvements on Legacy Lane (City Project No. 519-ST) were approved by the

City of South Gate on January 5, 2016. The Class III Bike Street is only a designation, necessitating signage and pavement markings. It is not a physical bike path. The Traffic Study for the Project made the following determination after review of all local facilities: all local pedestrian routes have adequate sidewalk facilities. This study does not identify any specific impacts that would require additional bicycle facilities. (See Appendix 3.5 of the DEIR) The City's Bicycle Plan includes the connection from Tweedy Boulevard to the LA River bike path to Burtis Street. More specifically, the Mobility Plan for the City of South Gate includes a Bicycle Plan (page 166 of General Plan; Page 24 of 72 of Mobility Element). It depicts (the then proposed, now under construction) Legacy Lane as a Class III Bike Street. The Mobility Element also defines Legacy Lane as a Class III Bike Street described therein as "New street connections from Tweedy Boulevard just east of Atlantic Avenue to the Los Angeles River" on Page 167 of the General Plan and Page 25 of 72 of the Mobility Element. A Class III Bike Street is a signed street providing for shared use of a street by motor vehicles and bicyclists. While bicyclists have no exclusive use or priority, the signage (both by the side of the street and stenciled on the roadway surface) warns motorists of bicyclists sharing the roadway space. The plans for the construction of Street Improvements on Legacy Lane (City Project No. 519-ST) were approved by the City of South Gate on January 5, 2016. This bicycle path would also serve the ISLC addition Project. Section 3.5 of the DEIR evaluates potential pedestrian safety impacts and provides information on existing pedestrian facilities.

Response A2-25

As described in Responses A2-11 through A2-24 and in Section 3.5 Pedestrian Safety of the DEIR (pages 3.5-7 through 3.5-8), LAUSD will comply with all standard conditions and will continue to coordinate with the City of South Gate to ensure safe pedestrian access to the school. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position, based on facts provided in the record, is Chakemco Street is unsafe for pedestrian access even with the City's suggested improvements. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City. No improvements are necessary or required for Chakemco Street.

Response A2-26

As described in the DEIR page 3.6-20, traffic counts were conducted in November 2015 when LHSC was operational. Therefore the effect of both schools is considered in the traffic analysis.

Response A2-27

Conflict with adopted bike, public transit and pedestrian facilities was analyzed as TRA-6 in the Initial Study, and no impacts were found. Please refer to page 3.6-25 and the Initial Study analysis in Appendix 1.0. As described in the DEIR page, 3.5-9 the anticipated number of students who would walk to and

from the school site (37) was calculated using mode split characteristics of LAUSD schools, established by surveys conducted for LAUSD's School Upgrade Program EIR. The Program EIR defines the following percentage breakdown for high school Project mode splits:

- Trips by car total 68.75% of all trips
- Trips by walking/biking total 24.65% of all trips
- Trips via bus, public transit, and other modes total 6.61% of all trips

The total net Project trip generation, based on the Project seating capacity of 459, is 101 inbound morning peak hour vehicle trips. This number was utilized to calculate pedestrian volumes for the analysis within this report section. For the Project traffic study, both inbound and outbound morning peak vehicle volumes are examined, which includes the full potential impact of drop-off trips, arriving/departing delivery trips, etc. For the pedestrian analysis, it was assumed that no measurable outbound pedestrian volumes would be present in the morning peak hour. Therefore, only inbound pedestrian volumes were examined in this analysis.

The net vehicle trip generation (utilized for the traffic report) was normalized to a 100% mode split: 101 inbound vehicle trips \times (100/68.75) = (101 \times 1.46) or 148 total trips. This number was then factored down to a total pedestrian volume, utilizing the mode split of 24.65% from the walk/bike percentage defined within the bulleted list above: 148 total inbound trips \times (walk/bike mode split of 24.65%) = 37 trips

Details on the anticipated mode split including transit trips are provided in DEIR Appendix 3.5-1.

Response A2-28

Use of the lighted regional athletic fields would be limited to school events (i.e., sports team use). Any use of the fields for other purposes would be subject to civic center permit request. These requests are reviewed and approved by each individual school. Further, the regional athletic fields were proposed as part of the SRHS #9 Project and impacts associated with regional athletic fields were fully analyzed in the Recirculated Final EIR for SRHS #9. Therefore any trips associated with the fields were analyzed in that document. The noise, air quality, traffic and pedestrian safety impacts of construction and operation of the athletic fields were fully evaluated in the Recirculated SRHS #9 EIR. At the time the SRHS #9 EIR was prepared, funding was not available for athletic field lighting. Since publication of that EIR, a potential funding source has been identified for the proposed improvements and LAUSD has therefore included the analysis in this EIR. This EIR considers the addition of nighttime lighting for these fields (See Project Description page 2.0-11, under the heading Recreation and Lighting). The incremental addition of trips associated with nighttime events is expected to be far less than the daily pick up and drop off operation of the school. Therefore, no additional traffic impacts would occur.

Response A2-29

As stated in the DEIR page 3.6-30 roadway segment analysis was not included in the defined study area for the proposed Project for two reasons. First, the Project does not have any direct access into regional neighborhoods, and therefore typical residential roadway analysis examined for potential neighborhood cut through traffic would not apply. Second, the City of South Gate does not require such analysis and does not define thresholds for roadway segment analysis. See the City of South Gate *Guidelines for Development Traffic Impact Analysis (TIA)*. The scope of the traffic analysis undertaken by LAUSD and its consultant, KOA Corporation, was determined in consultation with the City of South Gate and memorialized in a scoping document dated September 14, 2015 and subsequently revised on November 9, 2015 based on comments received from the City. The scoping document was created as a good faith effort to document major assumptions and set the parameters of the traffic study performed for the proposed Project. See Response A2-4 for a summary of meeting between LAUSD and the City. See Appendix 10.0-1 for minutes from these meetings.

Response A2-30

As stated in the DEIR page 3.6-30 roadway segment analysis was not included in the defined study area for the proposed Project for two reasons. First, the Project does not have any direct access into regional neighborhoods, and therefore typical residential roadway analysis examined for potential neighborhood cut through traffic would not apply. Second, the City of South Gate does not require such analysis and does not define thresholds for roadway segment analysis. See the City of South Gate *Guidelines for Development Traffic Impact Analysis (TIA)*. The scope of the traffic analysis undertaken by LAUSD and its consultant, KOA Corporation, was determined in consultation with the City of South Gate and memorialized in a scoping document dated September 14, 2015 and subsequently revised on November 9, 2015 based on comments received from the City. The scoping document was created as a good faith effort to document major assumptions and set the parameters of the traffic study performed for the proposed Project. See Response A2-4 for a summary of meeting between LAUSD and the City. See Appendix 10.0-1 for minutes from these meetings.

Response A2-31

As discussed in Section 3.6 Transportation of the Draft EIR, construction of the proposed Project would contribute to a cumulative impact at the intersection on Atlantic Avenue/Chakemco Street. Implementation of Mitigation Measure MM-TRA-1 would reduce the cumulative traffic impact to less than significant. However, the identified cumulative impact would remain significant unless the signalization of the Atlantic Avenue/Chakemko Street intersection, identified in Mitigation Measure MM-TRA-1, occurs prior to the opening of the proposed school. As these improvements are within City of South Gate's jurisdictions and would require approvals from the City, LAUSD cannot ensure that the

signalization plan improvements would be completed prior to the school's opening, Thus, the Project's traffic impacts on the Atlantic Boulevard and Chakemco Street intersection could result in a significant and unavoidable cumulative traffic impact. Therefore, the LAUSD Board of Education will need to adopt a Statement of Overriding Consideration when considering certification of the EIR and approval of the Project. Negotiation of the terms of the MOU with the City to implement the signalization program, including funding for acquisition and construction, will occur outside of the CEQA process.

Response A2-32

As stated in the DEIR page 3.6-30 roadway segment analysis was not included in the defined study area for the proposed Project for two reasons. First, the Project does not have any direct access into regional neighborhoods, and therefore typical residential roadway analysis examined for potential neighborhood cut through traffic would not apply. Second, the City of South Gate does not require such analysis and does not define thresholds for roadway segment analysis. See the City of South Gate Guidelines for Development Traffic Impact Analysis (TIA).

The scope of the traffic analysis undertaken by LAUSD and its consultant, KOA Corporation, was determined in consultation with the City of South Gate and memorialized in a scoping document dated September 14, 2015 and subsequently revised on November 9, 2015 based on comments received from the City. The scoping document was created as a good faith effort to document major assumptions and set the parameters of the traffic study performed for the proposed Project. See Response A2-4 for a summary of meeting between LAUSD and the City. See Appendix 10.0-1 for minutes from these meetings.

Response A2-33

The proposed Project would not require any specialized construction equipment beyond what is required for a typical construction Project and would not cause damage beyond normal wear and tear. It is assumed that the roadways have been designed, built, and maintained to withstand normal usage. As part of the MOU between the City and LAUSD for roadway and other construction as part of LHSC, LAUSD included funding for road repairs. LAUSD expects to undertake the same process for this Project.

Response A2-34

The commenter states an opinion that parking could result in secondary impacts on nearby neighborhoods. Parking Standards for LAUSD schools are provided in LAUSD's School Design Guide. Vehicular access and parking shall comply with Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. The Design Guide contains the following regulations related to traffic:

- Parking Space Requirements

- General Parking Guidelines
- Vehicular Access and Pedestrian Safety
- Parking Structure Security

The proposed Project provides staff parking in accordance with LAUSD standards of 2.25 spaces per middle school classroom. The determination of sufficient parking is made based on LAUSD experience operating hundreds of schools throughout Los Angeles County. Also analyzed as part of the Project is the inclusion of nighttime lighting for the athletic fields, so it is therefore reasonable to assume that nighttime events would occur. On the occasion nighttime events occur, parking in staff lots would be available at the discretion of site administrators. Nighttime parking will be available at the 54 spaces at the athletic fields, 133 parking spaces at LHSC, and the additional 40 staff spaces on the ISLC campus. Street parking would also be available on Legacy Lane for nighttime events. The SRHS #9 EIR considered parking availability on the Project site and determined special events on campus are not expected to be frequent. Special events on the school campus would normally take place outside of school hours. Given that these programs are intended to serve the local community, and are geared toward family and group activities, most participants are expected to walk or carpool. Further, the addition of ISLC would add 40 parking spaces to the available supply with construction of the Project. Current approved plans for Legacy Lane restrict parking between the hours of 3 a.m. and 8 a.m.; no other restrictions are in place at this time. Therefore, this parking is assumed to be available for nighttime events.

The commenter asserts that by including parking on Legacy Lane as part of the available parking this is “double counting” spaces. Although both schools will use the fields they will not be using them concurrently. Either ISLC will be using the fields for an event or LHSC will use the fields for an event. Therefore, the parking estimated for LHSC will be available if ISLC is holding an event on the fields. Further, events would generally occur during off peak hours when the parking lots of the regional athletic fields, ISLC, and LHSC are expected to be available. While there may be some spill over parking into the existing residential neighborhoods, the amount of parking provided on and around the site would ensure that any overflow parking would be negligible and would not result in a physical impact on the residential neighborhoods.

Response A2-35

The noise, air quality, traffic and pedestrian safety impacts of construction and operation of the athletic fields were fully evaluated in the Recirculated SRHS #9 EIR. At the time the SRHS #9 EIR was prepared, funding was not available for athletic field lighting. Since publication of that EIR, a potential funding source has been identified for the proposed improvements and LAUSD has therefore included the

analysis in this EIR. As was stated in the SRHS #9 EIR, special events on the campus are not expected to be frequent. Special events on the school campus would normally take place outside of school hours. Given that these programs are intended to serve the local community, and are geared toward family and group activities, most participants are expected to walk or carpool. As discussed above, only one school would hold an event on the fields at a time, therefore the trips associated with nighttime events would be less than a full drop off/pick up as analyzed in the EIR (See Section 3.6 Transportation, peak hour trips). As stated on page 3.6-29 of the DEIR, the Project would generate approximately 188 AM peak-hour trips and 138 PM peak hour trips during a typical weekday.¹ As nighttime events at the fields would generally occur in off peak hour, and most participants are expected to walk or carpool, they would be expected to generate less than the 138 peak hour trips.

The addition of field lighting and the specific lighting impacts were evaluated in the Initial Study (refer to Appendix 1.0).

Response A2-36

As stated in Response A2-35 above, special events associated with ISLC (i.e., dances, etc.) are expected to be infrequent because ISLC is a middle school and such events are less frequent at middle schools. As stated in Response A2-34 above, sufficient parking for special events is provided on the LHSC and the ISLC and on Legacy Lane. Parking lot use for beyond the bell activities is at the discretion of the school administrators and not at the discretion of LAUSD. However, based on past availability of staff parking for these types of activities (i.e., past use LHSC) it is reasonable to assume the staff parking areas will be made available.

Response A2-37

The DEIR fully analyzes and discloses significant and unavoidable construction noise impacts (see DEIR 3.4-23) at the Aldrich Road residences. The residences along Adella Avenue (580 feet north of the Project site) are over twice as far from the proposed Project site than the residences along Aldrich Road (245 feet south of the Project site), and are shielded from potential construction noise by the Legacy High School Complex (LHSC – 100 feet north of the Project site). Because they are further than the Aldrich Road residences and shielded by the LHSC, noise level increases would be significantly lower than both LHSC and the residences along Aldrich Road. The residences along Aldrich Road and the LHSC represent the worst-case noise level increases. Further, the noise impacts associated with the use of the athletic fields was analyzed in the SRHS#9 Recirculated EIR and determined to be a significant and unavoidable impact. (See page 3E-15 of the LAUSD South Region High School No. 9 Final EIR.) (The South Region

¹ KOA Corporation, *Traffic Impact Study, LAUSD International Learning Center Addition*, (2016) 15.

High School Recirculated EIR is incorporated by reference into this document and attached as Appendix 10.0 to the EIR). As stated in the SRHS #9 EIR, "Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA Leq at 50 feet. Noise generated by activity in the football and baseball fields would be audible to residences along Wood Avenue and Aldrich Road....athletic activity noise occurring in the athletic areas would increase the ambient noise level above the 3 decibel ambient noise level threshold at residences along Wood Avenue and Aldrich Road. Therefore, this impact would be considered significant and unavoidable." Use of the athletic fields as part of the proposed Project would be expected to result in similar noise levels as those evaluated in the SRHS #9 EIR (i.e., above a 3 decibel ambient noise level threshold) at the Aldrich Road residences. This impact was identified as part of the SRHS #9 EIR and is not therefore a new impact. As such, the use of the athletic fields would not result in any new significant impacts not previously identified. Therefore recirculation of the EIR is not required. See Corrections and Additions for changes to the DEIR.

Regarding noise impacts of the parking, as further described in Response A2-44 below and on page 3.4-24 of the DEIR which states "According to the FTA, a parking facility with a peak hourly activity of 1,000 vehicles can produce a noise level of 56.4 dBA Leq at a reference distance of 50 feet.² Assuming a conservative peak hourly activity level of 40 vehicles, the capacity of the proposed parking lot, it would be expected to generate a maximum noise level of 42.4 dBA Leq at a reference distance of 50 feet. Given the 245 feet distance between the proposed parking lot and Aldrich Road Residences, auto-related noises at the proposed parking lot would not contribute to meaningful temporary or sustained increases in ambient noise levels at Aldrich Road Residences, even during peak times of operational activity." Further, a large industrial facility (steel fabrication) is located between the athletic fields and the Aldrich Road residences and due to its location, the industrial facility acts as a noise buffer.

Response A2-38

The commenter states an opinion that the parking supply is insufficient for staff. ISLC is not an expansion of an existing school or a new school. The ISLC middle school is part of an existing program (ISLC) that serves 6-12 grades. Currently, the middle school portion of the school is located off-site (at Southeast Middle School). ISLC is currently in operation, with no planned expansion in either population or staff. In addition, the parking standard is stated in Section 2.3, Vehicular Access and Parking of the School Design Guide, January 2014. Therefore, the on-site parking supply of 40 spaces exceeds the District standard of 2.25 spaces per middle school classroom (16 classrooms means minimum 36 parking spaces) and will be built to LAUSD design standards for parking spaces. LAUSD has developed these standards based on its knowledge of school operations. Although not applicable, it would also exceed the City of South Gate

² Federal Transit Administration, Transit Noise and Vibration, Impact Assessment, May 2006.

parking standard for schools (one (1) space per employee). Based on LAUSD's loading factor of 2.25 staff members per middle school classroom, the City's minimum number of parking spaces would also be 36 spaces. Therefore, the parking supply is adequate as it is designed to accommodate the existing school program.

Response A2-39

The DEIR focuses on school drop off and pick up as this would be the largest traffic generation phase during the day. Other events associated with the middle school would be infrequent. As currently occurs at ISLC, the proposed Project would include after-school programs for the students, such as athletic activities, special-interest clubs, and extracurricular activities. Additionally, the proposed Project would include occasional nighttime events during the school year; some of these events would be campus-wide such as sport games, school plays, and open houses, while others would be grade-specific, such as commencement. These events would not generate the same volume of traffic as would the combined drop-off and pick-up for the ISLC and LHSC, simply because not all students from both schools are likely to attend. Further, as demonstrated in the Draft EIR, the addition of school traffic alone (i.e., Existing Plus Project), which accounts for existing school drop off at LHSC and assumes ISLC, traffic would not be sufficient to result in a significant traffic impact (DEIR Table 3.6-6 Existing Plus Project Intersection Levels of Service p. 3.6-30). Therefore, it can be reasonably assumed that middle school activities (which would generate less traffic than a full drop-off/pick-up) would not result in significant intersection impacts.

The Commenter asserts that by including parking on Legacy Lane as part of the available parking this is "double counting" spaces. Although both schools will use the fields they will not be using them concurrently. Either ISLC will be using the fields for an event or LHSC will use the fields for an event. Therefore, the parking estimated for LHSC will be available if ISLC is holding an event on the fields. Further, as described above, events would generally occur during off peak hours when the parking lots are expected to be available. While there may be some spill over parking into the existing residential neighborhoods, the amount of parking provided on and around the site would ensure that any overflow parking would be negligible and would not result in a physical impact on the residential neighborhoods.

Response A2-40

The commenter states an opinion that the parking supply is insufficient for staff. ISLC is not an expansion of an existing school or a new school. The ISLC middle school is part of an existing program (ISLC) that serves 6-12 grades. Currently, the middle school portion of the school is located off-site (at Southeast Middle School). ISLC is currently in operation, with no planned expansion in either population or staff. In addition, the parking standard is stated in Section 2.3, Vehicular Access and Parking of the School Design

Guide, January 2014. Therefore, the on-site parking supply of 40 spaces exceeds the District standard of 2.25 spaces per middle school classroom (16 classrooms means minimum 36 parking spaces) and will be built to LAUSD design standards for parking spaces. LAUSD has developed these standards based on its knowledge of school operations. Although not applicable, it would also exceed the City of South Gate parking standard for schools (one (1) space per employee). Based on LAUSD's loading factor of 2.25 staff members per middle school classroom, the City's minimum number of parking spaces would also be 36 spaces. Therefore, the parking supply is adequate as it is designed to accommodate the existing school program.

A complete parking analysis under CEQA was performed as part of the SRHS #9 Recirculated EIR. Page 3H-25 of the EIR includes the following analysis:

"To determine the typical parking demand for a high school, a parking survey of a nearby high school was conducted. Based on a recent parking survey conducted at Bell High School, located approximately 2.7 miles north of the proposed Project site at Bell Avenue and Flora Avenue in the City of Bell, the typical parking demand ratio is 0.09 vehicle per student.³ This student-based rate defines the total parking demand for students, faculty and staff, and visitors. The proposed project's campus population would be approximately 1,431 students. Using the 0.09 vehicle per student rate calculated from the Bell High School survey, the total student parking demand for the proposed project would be 129 parking spaces.

Existing on-street parking within the perimeter of the proposed project site was observed during mid-morning at around 11:00 AM on a typical Wednesday (May 14, 2008) and around 5:00 PM on a typical Tuesday (May 20, 2008). The defined survey periods provided for the capture of area parking demand during the AM mid-morning period when residents would largely be away at workplaces, and also captured parking demand in the early evening, when residents have returned home.

On days of trash collection, some parking is restricted where on-street parking areas are occupied by refuse containers, but the most restricted supply occurs on days of street sweeping. During street sweeping period, one side of most local roadways is closed for a half-day period. As students would need to occupy a space for the entire span of the school day, street sweeping restrictions would cause students to park elsewhere.

Approximately one quarter mile is considered the maximum distance a typical person would walk from a parking space to a destination, and vice versa. Thus, an approximate one-quarter mile radius of the

³ KOA, Traffic Study for Los Angeles Unified School District South Region High School # 9, July 2, 2008.

entrance of the proposed school site was observed. These streets are the ones on which students would be expected to park their vehicles in the surrounding street network. The total weekday area supply, based on on-street parking restrictions during a typical day of street cleaning, is approximately 346 spaces. Including demand generated by existing area uses, the parking availability within a one-quarter mile radius from the proposed project site was determined to be 104 spaces during the AM mid-morning period and 75 spaces during the early evening period. The calculation of this capacity takes into account residential driveways. The proposed project parking demand would be met by the on-street parking supply. The impact would be less than significant. Much of the parking demand would be absorbed by the off-street staff/faculty parking lot. The available on-street parking supply of 104 spaces in the AM period and 75 in the PM period would be adequate to accommodate the remaining student parking demand.”

Parking demand for the middle school is expected to be far less, as middle school students do not drive to school, but are dropped off. Staff parking would also be accommodated on the Project site, eliminating the need to use any street parking. Therefore, the only parking demand that could be generated as a result of the proposed Project is the parking demand for nighttime events at the athletic fields (daytime events at the athletic fields were considered as part of the SRHS #9 Recirculated EIR. During nighttime events at the athletic fields, parking would be provided at the 54 space parking lot on the athletic field site, 133 spaces on the LHSC site, 40 spaces on the ISLC campus, followed by street parking on Legacy Lane based on the analysis provided in SRHS #9 that is expected to be 75 spaces during the early evening period. Plans for Legacy Lane, as approved by the City, restrict parking between the hours of 3 a.m. and 8 a.m.; no other restrictions are in place at this time. Combined, 302 spaces would be available for parking for nighttime events. Given that these programs are intended to serve the local community, and are geared toward family and group activities, most participants are expected to walk or carpool. Therefore, the parking supply would be adequate.

Response A2-41

Legacy Lane is an approved roadway with plans approved by the City of South Gate. Once maintained by the City, it is within the City’s discretion to restrict parking. The plans for the Construction of Street Improvements on Legacy Lane (City Project No. 519-ST) were approved by the City of South Gate on January 5, 2016. Per the approved Legacy Lane plans parking is restricted from 3:00 a.m. to 8:00a.m. The athletic fields will be fenced. LAUSD has provided parking for the school consistent with District design standards.

Response A2-42

A landscaped area is shown in the Project Description (See Figure 2.0-3 Surrounding Land Uses and page 2.0-2 of the DEIR). This area is not a community garden as the Commenter asserts, and there is no reference in the DEIR that it is a community garden. The area is a landscaped area that will be maintained by LAUSD. This area will remain gated; LAUSD currently uses this area for monitoring groundwater.

Response A2-43

The first bullet point referenced in the comment is discussing activity for the proposed Project site. The second bullet point referenced in the comment is discussing adding nighttime lighting at the athletic fields. Because the proposed lighting improvement is occurring at the adjacent Project site, it would not generate nighttime uses or noise levels increases at the proposed Project. These statements are not in conflict as the majority of school noise would continue to occur during school hours. On some occasions it is expected that noise will also occur at the athletic fields after school hours, however, these events would be expected to occur less frequently. Additionally, noise from the adjacent Project site generated by athletic activity would be attenuated by the industrial facility interrupting the line of sight between the athletic fields and sensitive receptors to the south (residences) of the adjacent Project site, and also by the noise attenuating walls between the industrial facility and said sensitive receptors.

Further, the noise impacts associated with the use of the athletic fields was analyzed in the SRHS#9 Recirculated EIR and determined to be a significant and unavoidable impact. (See page 3E-15 of the LAUSD South Region High School No. 9 Final EIR.) (The South Region High School Recirculated EIR is incorporated by reference into this document and attached as Appendix 10.0 to the EIR). As stated in the SRHS #9 EIR, "Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA Leq at 50 feet. Noise generated by activity in the football and baseball fields would be audible to residences along Wood Avenue and Aldrich Road....athletic activity noise occurring in the athletic areas would increase the ambient noise level above the 3 decibel ambient noise level threshold at residences along Wood Avenue and Aldrich Road. Therefore, this impact would be considered significant and unavoidable." Use of the athletic fields as part of the proposed Project would be expected to result in similar noise levels as those evaluated in the SRHS #9 EIR (i.e., above a 3 decibel ambient noise level threshold) at the Aldrich Road residences. This impact was identified as part of the SRHS #9 EIR and is not therefore a new impact. As such, the use of the athletic fields would not result in any new significant impacts not previously identified. Therefore recirculation of the EIR is not required. See Corrections and Additions for changes to the DEIR.

Response A2-44

The commenter states that the DEIR asserts that noise from student activities would be limited to school day hours, and that this assumption has not proven true for the operations of LHSC. However, page 3.4-25 of the DEIR states that the “majority” of school noises would occur during daytime hours (this is also noted in comment A2-43 by the commenter, above). According to the LHSC bell schedule, school begins at approximately 8 a.m. and ends at approximately 2:53 p.m.⁴ Therefore, the majority of school activity is expected to occur between these hours. The majority of school activity is not expected to occur early morning or evening hours. On some occasions it is expected that noise will also occur at the athletic fields after school hours, however, these events would be expected to occur less frequently. Further, the noise impacts associated with the use of the athletic fields was analyzed in the SRHS#9 Recirculated EIR and determined to be a significant and unavoidable impact. (See page 3E-15 of the LAUSD South Region High School No. 9 Final Recirculated EIR.) (The South Region High School Recirculated EIR is incorporated by reference into this document and attached as Appendix 10.0 to the EIR). As stated in the SRHS #9 EIR, “Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA Leq at 50 feet. Noise generated by activity in the football and baseball fields would be audible to residences along Wood Avenue and Aldrich Road....athletic activity noise occurring in the athletic areas would increase the ambient noise level above the 3 decibel ambient noise level threshold at residences along Wood Avenue and Aldrich Road. Therefore, this impact would be considered significant and unavoidable.” Use of the athletic fields as part of the proposed Project would be expected to result in similar noise levels as those evaluated in the SRHS #9 EIR (i.e., above a 3 decibel ambient noise level threshold) at the Aldrich Road residences. This impact was identified as part of the SRHS #9 EIR and is not therefore a new impact. As such, the use of the athletic fields would not result in any new significant impacts not previously identified. Therefore recirculation of the EIR is not required. See Corrections and Additions for changes to the DEIR.

Additionally, the proposed Project is not a high school. Therefore, many of the activities listed by the commenter, such as dances and sporting events, are expected to occur with much less frequency than what would occur at a high school. Events for younger children (such as those attending a middle school) would be expected to terminate at a much earlier hour, and are therefore less likely to occur as late as 7:00 p.m. Further, the actual operation of many of these activities would occur inside school buildings and be shielded from sensitive receptors by the school itself. In particular, dances, back to school nights, awards ceremonies, and student exhibitions would be expected to take place within the interior of the school

⁴ <https://legacyhs-laUSD-ca.schoolloop.com/schedules>, accessed May 24, 2017.

buildings. Because these activities would take place inside of school facilities, adjacent sensitive receptors are not expected to experience an audible sound level increase as a result of after school activities.

Regarding noise from outdoor athletic activity, the proposed Project would implement Project Design Feature N-4 (PDF N-4) from the LAUSD School Upgrade Program EIR. This includes providing noise shielding barriers at playgrounds and other noise-generating school areas that are adjacent to sensitive receptors such as the proposed basketball and volleyball courts on the east side of the Project site. These on-site barriers would be expected to attenuate noise levels associated with outdoor recreational activity to below any level of human perceptibility.

As shown in DEIR Table 3.4-11, peak hour vehicle operational noise would be most significant during the a.m. peak hour, and would increase noise levels by approximately 0.4 dBA. This sound level increase would not be perceptible to humans. As currently occurs at ISLC, the proposed Project would include after-school programs for the students, such as athletic activities, special-interest clubs, and extracurricular activities. Additionally, the proposed Project would include occasional nighttime events during the school year; some of these events would be campus-wide such as sport games, school plays, and open houses, while others would be grade-specific, such as commencement. These events would not generate the same volume of traffic as would the combined drop-off and pick-up for the ISLC and LHSC, simply because not all students from both schools are likely to attend. As a result, traffic operations would not be expected to increase noise levels to be perceptible to humans.

Response A2-45

The nearest residential receptors to the west are approximately 900 feet away and shielded by commercial buildings; the nearest residential receptors to the north are approximately 580 feet away and shielded by multiple educational and commercial buildings. The nearest residences to the east are approximately 1,500 feet away. Construction noise levels are not expected to be audible at any of these sites.

Section 3.4.3 of the DEIR identifies the Aldrich Road residences and the Legacy High School Complex as sensitive receptors. As noted on page 3.4-22 of the DEIR, temporary construction noise barriers would significantly reduce noise impacts at Aldrich Road and Legacy High School. Mitigation measure **MM-NOI-4** states the following:

MM-NOI-4 Prior to issuance of a grading permit, the construction contractor or its designees shall install temporary noise barriers at least 10 feet in height and with a transmission loss value of at least 25 dBA (e.g., 1" plywood with acoustical blankets or aluminum sheets with a thickness of at least 0.125 inches) capable of attenuating on-site construction noises by 15 dBA.

MM-NOI-4 does not state that construction noise barriers be built “when necessary” nor does it state that the walls only be built at the south side of Legacy Lane. The DEIR goes on to state that the barriers would reduce noise impacts at Legacy High School, which is north of the Project site. . As stated on page 3.4-23 of the DEIR, at the Aldrich Road residences, construction-related noise increases would be reduced below commonly accepted CEQA noise thresholds and even thresholds of ready human perceptibility. However, the Project construction would still contribute to noise levels in excess of the City’s noise standard of 50 dBA for duration of greater than 30 minutes per hour for residential properties, as the existing daytime ambient noise levels at Aldrich Road Residences (currently at 50.8 dBA) already exceeds the City’s daytime residential noise standard. As such, mitigation measures **MM-NOI-1** through **MM-NOI-4** provide appropriate mitigation for construction noise level increases.

Response A2-46

See Response A2-4 LAUSD schools are required to comply with California Education Code Sections 32281-32289 dealing with the preparation of “safe school plans” (SSPs) to address violence prevention, student wellness, emergency preparedness, traffic safety, and crisis intervention. The District has developed an SSP model plan and guidelines to assist individual schools in the development of their individual SSPs.⁵ The purpose of the model plan is to standardize SSPs throughout the District and minimize the time required for annual updates. It comprises three volumes: 1) Coordinated Safe and Health School Plan, Prevention Programs; 2) Emergency Procedures; and 3) Recovery Procedures. The District also has developed an emergency response protocol for use during an emergency on a District site during renovation or modification work performed by a contractor.⁶

Response A2-47

The pedestrian safety analysis was based on all potential access routes to the Project site by pedestrians. LAUSD consulted with the City about the scope of the traffic impact study. The scoping document was created as a good faith effort to document major assumptions of the traffic study performed for the proposed Project. See Response A2-17 and A2-20 regarding infeasibility of improvements at Chakemco Street and not identifying the street as a pedestrian route in Safe Routes to School map.

Response A2-48

With regard to public safety impacts to the City of South Gate, all students attend South Gate schools and therefore there would be no net negative impact to public safety from the construction of ISLC. Relieving overcrowding at South Gate Middle School could reduce impacts to public safety, particularly given the

⁵ LAUSD OEHS Reference Guide REF-1242.6, Safe School Plans Update for 2009-2010, August 21, 2009.

⁶ LAUSD Existing Facilities – Construction Safety, SAF: 30, revised March 2, 2007

removal of portable buildings. New construction would provide better sight lines and modern safety technology such as closed circuit TV (CCTV) that is not available for portable classroom buildings. Hazards associated with proximity to the LA River were evaluated in the Initial Study (See pages 60 and 61 of the Initial Study in Appendix 1.0) and in the SRHS #9 EIR (See Section 3D Hazards and Hazardous Materials)

The SUP Program EIR address safety at LAUSD schools (See Section 5.15 Public Services). Individual school projects, such as ISLC, include both design features and provisions for Los Angeles School Police Department (LASPD) police officers in order to ensure a high level of safety and security at school projects and in the immediately surrounding area. The entries and boundaries of school campuses are fenced, secured, and carefully controlled by the LAUSD staff and the LASPD. Marked LASPD police vehicles patrol high schools on a regular basis. LAUSD maintains a cooperative working relationship between the LASPD and affected local and regional law enforcement agencies who act as backup. Further, LAUSD schools are required to comply with California Education Code Sections 32281-32289 dealing with the preparation of “safe school plans” (SSPs) to address violence prevention, student wellness, emergency preparedness, traffic safety, and crisis intervention. The District has developed an SSP model plan and guidelines to assist individual schools in the development of their individual SSPs. The purpose of the model plan is to standardize SSPs throughout the District and minimize the time required for annual updates. It comprises three volumes: 1) Coordinated Safe and Health School Plan, Prevention Programs; 2) Emergency Procedures; and 3) Recovery Procedures. The District also has developed an emergency response protocol for use during an emergency on a District site during renovation or modification work performed by a contractor.

Response A2-49

See Response A2-17, Response A2-20 and Response A2-48.

Response A2-50

Refer to Response A2-37 Response A2-43 and Response A2-44.

Response A2-51

See Response A2-35 and Response A2-36

Response A2-52

The comment refers to LAUSD standard conditions. The full text of the condition is as follows:

SC-T-3: LAUSD will coordinate with the City of South Gate to agree on the following:

- Compliance with the City’s design guidelines for access, parking, and circulation in the vicinity of the 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 SRTS, 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 ITE Trip Generation manual to determine trip generation rates based on the size of the school facility, 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.

The intent of this condition is to work in partnership with the City. As described in Response A2-4 above, LAUSD has made every good faith effort to work with the City of South Gate to identify and mitigate potential significant impacts. As detailed in the meeting minutes and correspondence with the City (provided in Appendix 10.0), the City did not raise concerns regarding the nighttime lighting aspect of the Project during the initial consultation phase. The scope of the traffic analysis undertaken by LAUSD and its consultant, KOA Corporation, was determined in consultation with the City of South Gate and memorialized in a scoping document dated September 14, 2015 and subsequently revised on November 9, 2015 based on comments received from the City. The scoping document was created as a good faith effort to document major assumptions and set the parameters of the traffic study performed for the proposed Project. See Response A2-4 for a summary of meeting between LAUSD and the City. See Appendix 10.0-1 for minutes from these meetings.

Response A2-53

The comment includes a misstatement of the Project description. No bleachers, restrooms, or other accessory structures are intended for the ISLC site, nor were restrooms or bleachers included in the Project description or analysis of the LHSC Project evaluated in the SRHS #9 EIR. These components are not part of the Project. No citation is provided for the statements.

Response A2-54

1. See Corrections and Additions
2. See Corrections and Additions

3. Page 43 of the Initial Study attached as Appendix 1.0 of the DEIR, states, additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The proposed Project would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors would be required to prepare and implement a SWPPP and associated best management practices (BMPs). Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities. Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the proposed Project would not occur and soil erosion impacts would be less than significant. No further analysis is required in the EIR.

NPDES compliance is also discussed on pages 64, 65 and 87 of the Initial Study. Standard conditions related to NPDES compliance include SC-HWQ-1 and SC-HWQ-2 provided for reference below.

SC-HWQ-1 Stormwater Technical Manual: This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction SUSMP requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.

SC-HWQ-2 Compliance Checklist for Stormwater Requirements at a Construction Site: This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.

NPDES compliance is also detailed in the Project Description page 2.0-35 under the heading LAUSD Construction BMPs Water Quality and Hydrology.

4. Public Services and infrastructure (i.e., utilities) impacts are analyzed in the Initial Study (Appendix 1.0 of the DEIR). These impacts were determined to be less than significant without mitigation and therefore were not included in the DEIR.

5. In addition to standard conditions listed in Table 2.0-2, the Project will comply with any necessary Low Impact Design (LID) requirements for the City.
6. See Corrections and Additions.
7. See Corrections and Additions
8. See Corrections and Additions
9. See Corrections and Additions
10. See Corrections and Additions
11. See Corrections and Additions
12. See Corrections and Additions
13. See Corrections and Additions

Response A2-55

LAUSD has constructed 131 new schools as part of its New School Construction Program to address overcrowded conditions. The Commenter's assumption that the school's student population (and consequently its staff numbers) will increase in the future, is not a factual or quantifiable statement. In fact, the Program EIR for the School Upgrade Program cites declining enrollment across LAUSD of approximately four percent (See Program EIR page 4-3 and 4-4). The proposed Project would relocate ISLC middle school students currently at Southeast Middle School and allow for the realignment of middle school enrollment in the South Gate area. The proposed Project is not anticipated to induce growth in the area.

Response A2-56

The proposed Project has been designed as a secure campus, with access to the site controlled by gates and fences. The aesthetic impacts of the Project were evaluated in the Initial Study (provided in Appendix 1.0). From an architectural perspective, the LAUSD School Design Guide⁸ (most recently adopted in 2015) provides guidance to design professionals, including in-house design professionals, to establish a consistent level of quality in school facilities throughout the District. As part of the application for development, the proposed Project would be required to comply with the Submittal Requirements Checklist included in Book Four of the LAUSD School Design Guide, demonstrating that the proposed Project is substantially consistent with the applicable design requirements for site planning, design, pedestrian scale, plants, utilities, and easements. As such, no mitigation is required. In addition a block

wall will be provided on the south end of the Project site to reduce potential noise impacts associated with the basketball courts. Noise impacts associated with operation of the Project are analyzed in Section 3.4 Noise of the DEIR.

Response A2-57

The District will impose all standard conditions related to water quality and hydrology. See Initial Study (Appendix 1.0) discussion of Hydrology and Water Quality. See also the listing of BMPs on page 2.0-35 of the DEIR.



Edmund G. Brown Jr.
Governor

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

Letter A-3



Ken Alex
Director

LAUSD
OFFICE OF
ENVIRONMENTAL HEALTH & SAFETY
2017 MAY 31 PM 4:13

May 23, 2017

Edward Paek
Los Angeles Unified School District
333 S. Beaudry Ave., 21st Floor
Los Angeles, CA 90017

Subject: International Studies Learning Center Addition Project
SCH#: 2016071011

Dear Edward Paek:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on May 22, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016071011
Project Title International Studies Learning Center Addition Project
Lead Agency Los Angeles Unified School District

Type EIR Draft EIR
Description The proposed project includes an addition to the existing Legacy High School Complex campus for ISLC middle school students; and removal of 17 classrooms in portable buildings from the South Gate Middle School campus. The ISLC Addition includes 16 permanent classrooms, an administration building, a lunch shelter, staff and student restrooms, outdoor basketball/volleyball courts, a surface parking lot with 40 parking spaces, a multi-purpose room and gym. Buildings constructed under the proposed project would be a maximum of two stories tall and up to 30 feet in height. Subsequent to the construction of the proposed project, approx 17 classrooms in aging and deteriorating portable buildings located on the South Gate MS campus will be removed.

Lead Agency Contact

Name Edward Paek
Agency Los Angeles Unified School District
Phone 213-241-4676 **Fax**
email
Address 333 S. Beaudry Ave., 21st Floor
City Los Angeles **State** CA **Zip** 90017

Project Location

County Los Angeles
City South Gate
Region
Lat / Long 35° 56' 25" N / 118° 10' 14" W
Cross Streets Tweedy Blvd. and Adella Ave.
Parcel No.
Township

Range **Section** **Base**

Proximity to:

Highways I-710
Airports
Railways UPRR
Waterways Los Angeles River
Schools Legacy HS
Land Use Vacant/Residential Neighborhood Zone (CV) / Tweedy Blvd., Specific Plan

Project Issues Air Quality; Geologic/Seismic; Noise; Toxic/Hazardous; Traffic/Circulation; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; State Water Resources Control Board, Division of Drinking Water; State Water Resources Control Board, Division of Drinking Water, District 22; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 04/06/2017 **Start of Review** 04/06/2017 **End of Review** 05/22/2017

Letter Number A3: Governor's Office of Planning and Research

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812

Response A3-1

The letter confirms receipt of the DEIR by OPR. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be forwarded to the decision-maker prior to a decision on the Project. No further response is necessary.

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
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April 28, 2017

Governor's Office of Planning & Research

MAY 01 2017

STATE CLEARINGHOUSE

Mr. Ed Paek
Los Angeles Unified School District
333 South Beaudry and Adella Avenue
Los Angeles, Ca 90017

RE: International Studies Learning Center (ISLC)
Addition Project
Vic. LA-710
SCH#2016071011
GTS#07-LA-2016-00829ME-DEIR

Dear Mr. Paek:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project consists of the construction of three buildings, including a 4,528 square foot administration building, 16,195 square foot MPR/gymnasium, and 28,915 square foot classroom building as well as a 2,147 square foot lunch shelter. The project will provide programming and a new campus for the ISLC middle school students

The nearest State facility to the proposed project is Interstate 710. Based on review, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities. In addition, the Caltrans supports the Standard Conditions of Approval that are included within the Los Angeles Unified School District, School Upgrade Program EIR (Program EIR). This would ensure that if any traffic impacts were to occur, those impacts would be properly mitigated.

1

Please be mindful that any transporting of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods.

In the Spirit of mutual cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions regarding these comments, please contact project coordinator Ms. Miya Edmonson, at (213) 897-6536 and refer to GTS# LA-2016-00829ME

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

Letter Number A4: Department of Transportation

California Department of Transportation
District 7 – Office of Regional Planning
100 S. Main Street, Suite 100
Los Angeles, CA 90012

Response A4-1

The letter c confirms receipt of the DEIR by Caltrans and provides a general statement in support of the Project Standard Conditions. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be forwarded to the decision-maker prior to a decision on the Project. No further response is necessary.

Padres Unidos de South Gate

Dr. Ref Rodriguez, LAUSD Board Member
333 S. Beaudry Ave. 24th Floor
Los Angeles, CA 90017
(213)241-6389

May 19, 2017

RE: International Studies Learning Center Middle School

Dear Dr. Rodriguez,

Padres Unidos de South Gate respectfully requests your attention to the community concerns with the traffic impact on Tweedy Blvd. and Atlantic Ave. in South Gate. During the meetings for both Legacy High School and International Studies Learning Center Middle School we have stated that we welcome the new school in our community to alleviate overcrowding in South Gate M.S. but we would like Tweedy Blvd. to be widened at that intersection to facilitate access to both campuses. Currently, the information we have been presented with states that a two lane street with a roundabout would be sufficient for both parents and staff to enter through Legacy Lane. We have suggested widening Tweedy Blvd. to allow for 3 lanes instead of 2, and opening another entrance off of Chakemco Street for staff to access the campus parking lot.

1

In addition to the daily access our students and staff need, we also need to consider the proximity of the L.A. River and the possibility of an emergency. If deemed necessary to evacuate both campuses, a 3 lane boulevard would facilitate the process; and an additional exit off of Chakemco would alleviate the traffic flow for staff on to Atlantic.

2

As a community we are also promoting healthier more environmentally friendly habits, such as walking, and biking to school. We have green pathways and bike lanes throughout South Gate already, and would like to see a lane for bikes to access ISLC Middle School. This would result in fewer vehicles on Tweedy Blvd. and Atlantic Ave. At this moment about 10% of our students, bike to Legacy H.S., which indicates that the trend can be expected to increase when ISLC Middle School students begin to attend the new campus across the street. We were informed that a traffic study was performed by an outside agency contracted by LAUSD, and we wonder if they noticed the existing bike lanes in the city of South Gate, and the proximity of the River bike lanes immediately next to the proposed campus site.

3

We hope that our concerns, needs, and suggestions will be considered by your wonderful team and other colleagues. As always, it is a pleasure to have your support and advocacy for safer environments conducive to learning. We welcome any and all efforts to demonstrate our support of this and other LAUSD projects, and understand that working together we can achieve our goal of 100% graduation.

Our deepest gratitude for your attention to this matter, and for your continued support for the city of South Gate.

Sincerely,

Padres Unidos de South Gate
Ivonne Loucel, President ixl9483@lausd.net

Maria Parra, Board Member maria.parra@lausd.net

Cc:
Dr. Michelle King, LAUSD
Mark Hovara, LAUSD
Jose Huerta, LAUSD

Letter No. B1: Padres Unidos de South Gate

Padres Unidos de South Gate
Ivonne Loucel, President

Response B1-1

During the consideration of SRHS#9, LAUSD considered the widening of Tweedy Boulevard. As detailed in the Final Recirculated EIR for SRHS#9, further widening of Tweedy Boulevard was determined to be infeasible due to the configuration of adjacent properties and the need to acquire additional right of way. As stated on page 3H-23 of the LAUSD South Region High School #9 Recirculated Final EIR, “[t]here is not adequate width available at the northbound and southbound approaches to provide additional lane capacity. Widening of any of the intersection approaches is therefore considered to be infeasible. Regarding the request to provide access from Chakemco Street, the staff parking is accessible via Legacy Lane. Chakemco Street is proposed to remain open and therefore could be used by staff.

Response B1-2

The District requires and implements a number of fire, emergency, and safety procedures including, emergency drills and procedures (REF-5803.2), emergency response protocol for LAUSD facilities (SAF.30), emergency operations plan, District emergency response and preparedness (BUL-5433.1), school site emergency/disaster supplies (REF-5451.1) and emergency communications and response actions (REF-5741.0), which would be required and implemented for the proposed Project. LAUSD procedures will be followed in the event of an emergency.

Response B1-3

A bike path currently exists and is in use by LHSC students, this condition would remain with the Project. In addition, although Legacy Lane is not proposed to have a dedicated bike lane, the street would be wide enough to safely accommodate bicyclists and would be implemented as a Class III bikeway, as provided in the City approved Legacy Lane construction plans. The City’s Bicycle Plan includes the connection from Tweedy Boulevard to the LA River bike path to Burtis Street. This bicycle path would also serve the ISLC addition Project.

International Studies Learning Center Addition Project

DRAFT EIR PUBLIC COMMENT MEETING
APRIL 27, 2017

Speakers

Welcome and Introductions

Fortunato Tapia, LAUSD Community Relations

Project Overview

Issam Dahdul, LAUSD Facilities Services Division, Development Manager

CEQA Overview

Edward Paek, LAUSD OEHS, CEQA Project Manager

Summary of Draft EIR Findings

Jessica Flores, Impact Sciences, Principal

Public Comments

Notes: Unintelligible [U/I]
Phonetic [ph]

Fortunato Tapia: [U/I] who is our Facilities Manager and then after the overview we'll have our colleague, Ed Paek and he will have a [U/I] how the Environmental Quality Act [U/I] part of today's meeting. Who then, introduce Jessica Flores who will actually give a brief presentation of the results of the Draft Environmental Impact Report and after that, we will open it to the floor for the most important part of the meeting. Which is the comments, of your input and any questions you may have. So, I see, we have probably... oh, most definitely many of our students, here right? And their parents and some teachers as well of the Campus, excellent. So, it's great to hear, without any further due. Oh, also, if anyone needs to, I'm going to make a brief announcement in Spanish. "*Si hay de habla hispana, y necesita tracción en español, y necesitan audífonos, por favor, alcen la mano para que lo proveemos uno.*" (If there anyone that speaks Spanish, and needs translation into Spanish and needs headphones, please raise your hand so we can provide you with one.) So, we need some headsets over here. Is there anyone here in the front? "*¿Necesita aquí?*" (Do you need one here?) "*Por favor, pueden mantener la mano levantada para que se les provee un audífono, y así podemos seguir con la reunión- igualmente.*" (Please, lift your hand so we can provide you a headphone and that way continue with the meeting.) If the is there anyone that is ahm- monolingual and only English speaker and would like the headsets, so that way, during the Q&A sessions. Or if there are any questions in Spanish, we can all follow along with the headsets. They turn us into bi-lingual individuals instantly. I have a couple of them at home...

[BACKGROUND: Laughing]

Fortunato Tapia: ...my relatives, my parents. So...

[BACKGROUND: Laughing].

Fortunato Tapia: Let's see... "*por favor*" (please). [ASIDE: (U/I).] We have plenty of headsets. [U/I] same class, same class? Extra credit?

[BACKGROUND: Laughing.]

Fortunato Tapia: Nice...

Unknown female: 1 [U/I].

Fortunato Tapia: Nice... [U/I] California- ish. [U/I]. "*Dos aquí al frente, por favor, ¿alguien más necesita un audífono?*" (Two over here to the front, someone else

needs a headset?) [U/I]. We're almost there. If anyone [U/I] not familiar with the school, and just joining us, just like home, there are restrooms on the outside of [U/I] okay, perfect, thank you. So, there are restrooms immediately outside in the yard. The gentlemen's is to the left and the ladies is to the right. In case you need to use the facilities. So, [U/I].

Unknown female 1: [U/I].

Fortunato Tapia: Sorry?

Unknown female 1: Is the press here? [U/I].

Fortunato Tapia: I don't know if there's any members of the press. Is there anyone here from the press or paper? No. Well, that answers your question. Alright, so without any further review, I will go ahead and pass the microphone to my colleague, Issam Dahdul.

Issam Dahdul: Thank you Fort. Ah- hello everybody, my name is Issam Dahdul, ah- I work for the Los Angeles Combined School District, Facilities Department. Ah- I'm the Project Manager for this Project. I'm excited to be a part of such a wonderful school and to nail [ph] to provide wonderful facilities ah- International Studies Learning Center. Ah- so, [U/I].

Unknown female: [U/I].

[BACKGROUND: Laughing].

Issam Dahdul: [U/I].

Unknown female: [U/I].

Issam Dahdul: So, I'm gonna give a quick overview. Some of you may be familiar with the projects and for some of you this may be the first time. I'm gonna give you a quick overview of the project and then we will call it up from the Office of Environmental Safety to provide ah... more in depth in terms of the Environmental Impact Report, CEQA document and of course at the end if there's, any questions I'm happy to answer them. Okay, I hope you guys can see that. So, just to give you a quick overview, of the Campus as you know, the school was a relatively new school. I believe it was opened in 2009. Ah- Legacy High School it was a very small school. It featured its own Principal and in purple here is the Legacy High School which is obviously completed. Ah- there's a lot of projects going on here. Besides the International Learning Center, we have a couple others that we are working on, that are pretty exciting. As part of the original High School,

was always intended to build this road, which is called Legacy Lane. It's gonna go around. You guys that live across the street, you can see a big... ah- dirt area- undeveloped area and so, we're planning to develop that. ah- and it always has been as part of the High School and so, this road here will actually allow these two businesses here to exit out to Tweedy and Chakemco and allows us to go to Adela that that goes North-South and up to Chakemco and runs through a part of [U/I] as well and close that and make it part of the entire site. So, we've got the road, we've also got playfields that will be part of Legacy High School which are a Baseball field and two Softball fields that are going to be developed. The road is actually under construction now. If you look if you peek through the fence, you can see that there are construction contractors right there now. And the playfields, we are hoping will start construction sometime in the summer. The other piece of this project is on the South of Tweedy Blvd. Right now, if you are walking, when you go to the school, on the North side of Tweedy Blvd., there is a sidewalk. On the Southside to get to the sidewalk to there is a sidewalk. We will acquire property, from the property owners in order for us to build the sidewalk. So, this summer we're also gonna be working with a contractor to install a sidewalk. We've already made ah- agreements with the property owners there and will now be starting construction on that as well. And hopefully we will finish this summer. And then last but not least and then subject of this meeting is Public Site for the International Studies Learning Center. So, as many of you know, and as I mentioned before, Legacy High School was broken into three small schools, SE, Valpa, and International Studies Learning Center. These students at International here on Legacy Campus are the 9th thru 12th graders. But half the students are 6th thru 8th grade students that at over at Southeast Middle School. So, once this new building is built, then the students from Southeast Middle School that are part of the International Studies Learning Center School will be able to attend on the Le- Legacy Campus. So, the 6th thru 8th will be here and the High School Students will be across the street. So, that the Principal will then have an oversee everybody on that Campus.

Unknown female 1: Let me ask you a question.

Issam Dahdul: So...

Unknown female 1: Let me ask you a question before you change that slide.

Issam Dahdul: Sure, go ahead.

Unknown female 1: [U/I].

Issam Dahdul: Sure.

Unknown female: 1 I cannot [U/I] for this project, site?

Issam Dahdul: Yes.

Unknown female 1: The brown area underneath, south what is that?

Issam Dahdul: That is a good question. So, as part of the playfields, this site, this area here. Ah-is going to be landscape. So, it's going to be part of the playfields. So, we have landscape there [U/I].

Unknown female 1: [U/I] now?

Issam Dahdul: This, this part here will be part of the play fields and which we think it will start this summer, this summer and it will take about a year of construction.

Unknown female 1: In relation to that picture, the road, the proposal for the future.

Fortunato Tapia: So, we'll finish with your question right now, we are going to ask to hold onto your question until the end of the presentation.

Unknown female 1: Thank you for allowing us to, [U/I] question [U/I].

Issam Dahdul: Yeah.

Unknown female 1: Thank you. First, I ask the brown area, of what it was and he responded. The second question is, the proposed road, that they are doing, how does that relate to the alley that's behind the houses on, Adela there... that string of houses? There's an alley way. It's been a long time that I don't use one of these. This alley way, how does it relate to these houses?

Issam Dahdul: Sure.

Unknown male 1: And between there, the alley way, so what's happening?

Issam Dahdul: So ultimately what happens is the road gets built and adjacent to will be to the sidewalk will be the [U/I] so there's [U/I] sorry about that. So, [ASIDE: Voices heard (U/I).] So, on the Southside of the new road, will be [U/I] so that hasn't changed.

Unknown male 1: This is not the form, but I wish they [U/I].

[U/I]. Alright, so, let's move on. In terms of the project, in terms of the International Project itself we've got approximately 50,000 square feet of new space. We're going to build sixteen (16) classrooms which will accommodate 459 students on approximately 4.9 acres. It will to some extent be a stand-alone school. It will have its own Administration area and it will have its own multi-purpose and gymnasium. And that was one point of contention before we started the project, was we did not want to impact the Legacy High School, ahm- shared spaces, we wanted to be able to provide multi-purpose rooms/gymnasium. One that will have the ability to have Basketball Courts as well. Ahm- its own food service and lunch area and its own parking lot. I should mention as part of this project, we're also going to be able to overtime, take portables out of Southgate Middle School. And the reason for that, is that the students move Southeast Middle School over to the Legacy High School Campus. That, frees up space at Southeast Middle School, in terms of classrooms and right now, Southgate Middle School is one of the most crowded Middle Schools in the District. And, so over time, we see ah- a decline in enrollment in Southgate Middle School and hopefully Southeast Middle School will get more students and that will balance out the school enrollment throughout the schools. Which allows us to take out some of the portables that are there now. Okay, so for International Studies. So, we've actually hired an architect ah- we are ah- we've designed the school. We had designed meetings and shared the design with the community and we have submitted to the State Architects for their approval. They are the ones that actually [ASIDE: Voices heard (U/I).] Ah- ah- there we go. Okay, although, I did like that one [U/I]. Ahm- so... what was I saying? Oh, we hired an architect. We designed it. We have just taken the plans for the new ahm- for the new school and to the Division of State Architects. They're the ones who actually approve the plans and say we proceed with the construction. Similar to, when, let's say you were going to build a house in the City of Southgate. You would have to go to the City of Southgate to have them approve your plans that your architect draws. The Division of State Architects is our City of Southgate if you will in terms of approval. So, this is the layout of the new site... ah- of the new school. What we plan to do is, right now, this is Tweedy Blvd., this is the new Legacy Lane that's being built now. We'll have the new classroom building right at the edge. New Administration so, cars will be able to come in and drop off. Here's the Administration and then students would come in this way. And for the Legacy High School students, the cars could- would have to pass International, that there we're going to build a cul-de-sac. So, what you see now, where Tweedy continues. Although the road will stay in place and will be part of the school and it can be closed off from cars. So, that cars are going to be

forced to turn around. Drop off on the North side of Tweedy for Legacy High School and then, exit back out to Tweedy. And then in...

[BACKGROUND: Voices heard (U/I).]

Issam Dahdul:

...in addition to the classroom building, the Administration building will build a third building multipurpose/gymnasium building that I had mentioned earlier. So, in addition to all that, we are doing forty (40) parking spaces on the Southside and obviously, we've have some outdoor Basketball courts ah- for PE and they will have the use of the new fields that are being built this Summer. Just to give you an idea what it would look like, this like if you you're standing at the corner of Tweedy and ahm- what will be Legacy Lane, and like at the corner now and looking across the street. This is the Library and this this is the classroom building- these are the classrooms. Here's the same thing, just a couple different views. And in terms of schedule, I've kind of hit on this, but in, in general, so we had this project defined ahm... back in 2015. Which means went to the Board of Education, and said "We would like to build a 459 seat Middle School at Legacy High School." And they approved the project. And they said yes, you can spend, spend money on, on building a new school. From that point, we did two (2) main things. There's a lot of things that go into this. But the two (2) main things are we start our Environmental Reviews. Which means we- in accordance with- SEQA we learned more about that today. We follow up, we prepare an Environmental Impact Report. Which is what we're going to be talking about today. And in addition, to that, we started the design. We hired an Architect and a Contractor to, a- design the buildings. Which were taken for approval and then once we get the DSA approval, we will then begin construction. So right now, we are here. Where ah- it is April 2017 and we plan to take the SEQA and project approval to the Board of Education for approval of the Environmental Impact Report and the project ah- next month. [ASIDE: June.] Ah- June sorry, June. Once that happens and once get the plans approved, by DSA we plan to start construction as early as the Fall of 2017 and we anticipate it will be a two (2) year construction period. With the goal of having occupancy in August of 2019. So, it's about two (2) years of construction and then the students can move in August of 2019. And then at point, as I mentioned about Southgate Middle School, as the enrollment in Southgate Middle School can start to shift, then we can we can start to move portables as needed. Okay, so, I will be around if there's any questions towards the end of the meeting. But right now, I'm going to hand this off to ah- Ed. He will talk about the SEQA process. Thank you.

[APPLAUSE]

Ed Paek:

Okay, thanks Issam. Again, my name is Ed Paek. I'm with the District's Office of Environmental Health and Safety. Ahm- and we are responsible for overseeing the SEQA process. Ahm... so what is SEQA? SEQA stands for the California Environmental Quality Act. Ahm... which is a State Law that requires Public Agencies such as the District to consider the impacts of decisions that involve changes to the physical environment. So, what does that mean? As a Public Agency, all LAUSD projects are subject to SEQA. Including useful projects such as this one. [CLEAR THROAT] At LAUSD, OHS is responsible for overseeing the SEQA process to ensure independent and unbiased review. The ultimate goal of SEQA is to develop and maintain a high, a high-quality environment. This is accomplished by informing and engaging the public about the project and its potential environmental impacts. Ahm- it's also to identify ways to avoid or reduce environmental impacts through mitigation measures or project alternatives. In 2014, LAUSD adopted a program, Environmental Impact Report ah- for the Districts School upgrade program. Of which his project is part of. Where applicable this project will rely on analysis standard conditions of approval and mitigation measures contained in the school upgrade program EIR. So, let me give you a quick overview of the SEQ process.

[PAUSE]

Ed Paek:

So, the SEQA process for this project started with the preparation of the Initial Study. The Initial Study determined if the project would have any potential significant impact on the Environment in any of twenty (20) topics including air quality, noise, traffic and others. Based on the results of the initial study, the District decided to prepare an Environmental Impact Report, an EIR which is the most comprehensive form of documentation required under SEQA. A notice of preparation of an EIR was distributed to gather agency and public comments related to the scope of the Environmental analysis ah- and this happened last Summer. As you recall we had a thirty (30) day Public review period, ahm- between July and August [CLEAR THROAT] and that's when we last met when we had the Scoping meeting here, in this very room. The comments received during the Scoping Process were used to inform the analysis contained in the in the Draft EIR which is now available for a Forty-five (45) day public review period that started on April tenth (10th) and ends on May twenty-eight (28). The results of the Draft EIR will be summarized ah- in the next segment of this meeting. Next slide. So, the comments we received during this forty-five (45) day public review period and the comments we receive at tonight's meeting ah- when we go to the Public

comments portion ah- will become part of the Administrative Record and be included in a document called "Final EIR." The final EIR will include responses to all the comments received ahm- and then this document will then be presented to the Board of Education ah- in June when they... ah- before they make a final decision regarding the – before they approve or disapprove the project. So, that's a meeting that happens ahm- at the District Headquarters in downtown L.A. on Beaudry ahm- the June meeting is scheduled for June thirteenth (13th). Ah- and you- everybody should will receive notice ahm- if this item is on that agenda. So, next slide. So, the purpose of this meeting is to provide a brief summary of the Draft EIR. Ah, - it's to provide ahm- an opportunity for the communities, stakeholders to ahm- present comments on the Environmental issues. We will record those comments. Ahm- we do have a Court Reporter present; so, everything here is being recorded. So, please keep that in mind. Ahm- and ah- those will become part of the Administrative Record.

Ah, then we will go ahead and outline the next steps in the SEQA process and just to remind everyone, no decision on the project itself is being made tonight. Tonight, is just a Public forum to gather your comments to include that as part of the EIR document analysis. So, at this; point I'll turn it over to Jessica Flores who is with Impact Sciences. Ahm... who is our Consulting Firm that did- prepare the EIR.

[APPLAUSE]

Jessica Flores:

So, I'm briefly going to talk about, ahm... start with the sort of types of impacts that we find in an EIR. Ahm... and the first one, there is ah- what we call, "No-Impact." And that means there's no connection between the ah- the project and the resource area. Ah, sometimes we see "Less than Significant Impact" which means there's some connection between the project and the resource area. But it doesn't exceed a SEQA threshold. Ah- a lot of times you have to apply mitigation measures. So, we find that the impact to be "Less than significant" with the application of the mitigation measure. And ahm- so, it exceeded the threshold but then we have a mitigation measures that we apply and, it brings it below the threshold. And then, the last type are, "Significant and Avoidable Impacts", that means there's no feasible mitigation measure that can be applied to the project and that would reduce that "Impact below the threshold." Thank you. So, the first step that we checked in the SEQA process was to prepare what is called an "Initial Study" and the "Initial Study" focused out ah- most of the resources areas for this project. Meaning they were found to be "Less than Significant" or there was "No Impact" to the- these are all the resource areas wh- where we found "No impact." So, these did not require further study. Ahm- these were other

ones were “Less than Significant” and all these ones did require further study and they weren’t analyzed in the EIR. Ah- what’s called “Scoped Out” in the Initial Study. So, what, [CLEARS THROAT] the EIR only looked at Air Quality, Geology, Hazards, and Hazardous Materials, Noise, Pedestrian Safety and Transportation and of- [ASIDE: Oh, sorry, go ahead... that’s okay.] Of those, there were “Less than Significant Impacts” for Air Quality Energy, ah- Geology, Hydrology and Pedestrian Safety. Ah- there was one mitigation measure for Pedestrian Safety and technically, it was “Less than Significant with Mitigation” and that required ah- limiting the access during drop-off and pick up. So, the conclusions of the EIR, we found three (3) significant and unavoidable impacts, two (2) of those related to noise was during the construction period. We found there would be ah- significant and unavoidable construction impacts and also, construction vibration impacts which is the sub-category of noise and those were all found to be ahm- at nearby residences.

There was also, what’s called the “Accumulative Impact for Traffic” and that means ah- not the project alone but the project combined with other areas of projects resulted in significant intersection impact on Atlantic and Chakemco. There is a mitigation measure that, would reduce this impact, it would be simulation of the intersection of Atlantic and Chakemco and this is a sort of complicated ahm- drawing of how it would look. But the point is, to understand that it is a complicated signalization scheme and because it is so complicated, ahm- LAUSD is working with the city to ahm- on the timing of this intersection improvement and because of the complexity of timing of it. LAUSD has decided to call that intersection “Impact Significant” and unavoidable even there is a mitigation measure that could be applied ahm- [PAUSE] and probably would likely happen based on the timing. We decided to call it “Significant Unavoidable.” So there were three (3) alternatives, ahm- evaluated in the EIR and as Ed mentioned, “Alternatives” are basically ahm- we are required to look, to look at potential ways to reduce “Significant Impacts.” The first alternative is ah- there is “No Project- Note Valid” which means nothing would happen on the site. The second alternative looked at a recently foreseeable development which means something would be built on this site and in this case, it was using the site core [ph] for purpose fields and the third alternative, included a reduced project alternative meaning ah- a school be built ah- be reduced in size. Ahm- so the main point of the alternatives. [ASIDE: Sorry] the main point of the alternatives is to reduce to reduce significant impacts. What we found with these alternatives were although the multipurpose field the no project reason foreseeable development alternative would reduce the ah- the traffic impact, it would not reduce the noise impacts. And the reduced project alternative would not have reduced any of the

significant unavoidable impacts. And ah- more importantly, neither of these or none of these, would achieve the Districts objectives for this site. Thank you.

Ed Paek: Thanks, Jessica. So, ah-

[APPLAUSE]

Ed Paek: So, at this point we know ah- there is high level of interest in the community regarding this project. And I want to thank all of you for attending tonight. Ahm- so we want to invite everyone here to ahm- present your comments on the Environmental issues that were analyzed in the Draft EIR ahm- again, I wanna remind, you that we have a Court Reporter present, who will transcribe your comments and will be included as part of the Administrative Record in the Final EIR. Ahm- if you don't feel comfortable speaking tonight or you have thoughts later on... in the middle of the night, please feel free to fill out a comment card ahm- which you can drop off with any of the District staff that are here tonight. You can also email any comments ah- actually go to the next slide. Ahm- you can email any comments to our email address: CEQA-comments@LAUSD.net

[BACKGROUND: Voices (U/I).]

Ed Paek: Oh, yeah please ah- remember on the subject line, write the name of the project which is the International Studies Learning Center Addition Project.

Fortunato Tapia: Ed, we're going to swap mics.

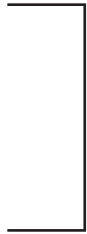
Ed Paek: Oh!

Fortunato Tapia: For you and our presenters. And then Tom Reuben and I will make use of these cordless mics and approach the audience.

Ed Paek: Okay, and ahm- I also want to give everyone a heads-up, please forgive me or forgive us in advance if it does not seem like we are not responding to your question or your comment, ahm- we are not ignoring you or trying to be disrespectful ahm- it's just that we might not have all the answers tonight. But, I assure you that, all your comments will be addressed in the Final Environmental Impact Report. In written form when we have our experts and more time to, to address them. So, ah-, yeah, ahm- if you have a question regarding or comment...

Fortunato Tapia: We have our first question in this corner and then, we'll take Tom Rubens side.

Unknown female 1: Ah, it's not really a question, but it's like a comment I have to say, ahm- I'm a student at Legacy and I feel like, that we shouldn't make this Middle School, like we already have enough traffic here? And I feel like, if we make this Middle School like, it's going to cause more traffic and, yeah I just feel there shouldn't be a Middle School here.



1

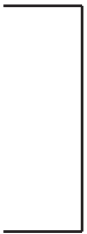
Ed Paek: Thank you. And I guess just, I know there are a lot of concerns about traffic on this site. So, let me just kind of give you a brief summary of what the traffic analysis in the EIR is all about. So, you know I know in the minds of most of us, traffic you know, when we try to get to the school drop and get dropped off or get picked up you know traffic is traffic. But the way we analyze traffic in the EIR is that we use kind of ah- ah, ah a process or a methodology that's actually prescribed or that's dictated by the City of Southgate. And that, usually auh- looks at auh- intersection impacts. So, we are not looking at the local impacts right of the drop off area. But we are looking at how a project would impact major intersections. So, you know for this example, the intersection of Tweedy and Atlantic ah- Atlantic and Chakemco ahm- there's twelve, about different intersections that we looked at ah- in the EIR ahm- and that kind of forms a basis of the traffic analysis. So, please keep that in mind.

Fortunato Tapia: Tom Ruben do you have a question on your end?

Richard Rangel: Ah... yes, good afternoon, my name is Richard Rangel, I live at 5114 Wood Ave.

Ed Paek: If you can bring the microphone closer up, please?

Richard Rangel: Ah- my question is, ah... okay, Legacy right now has their PA system real load. Alright, people work at night as during the day and your PA system, they announce it three (3) times a day and is it... will your school do the same thing? And also, when they open ahm- the Adela for let the students come in through this way... open Adela for they can come in this way?



2

Ed Paek: Ahm- so, to respond to the PA system. Yes, the new school will have a PA System which is designed by LAUSD standards ahm- you know, by we have design standards which require us to point the PA System in towards the campus not out there. Ahm- you know we understand there might be you know, some leakage into the, the to the surrounding

neighborhood. But, ahm- yeah, that's kind of I guess schools operate. Ahm... and then with regards opening the Adela...

Fortunato Tapia: Entrance.

Ed Paek: You talking about Northern entrance?

Richard Rangel: Yeah.

Ed Paek: So, actually ahm... as part of original kind of Development Agreement with the City of Southgate for the Legacy High School Camps ahm- we were not permitted to use that, that drop off area. Ahm- due to the potential neighborhood traffic ahm-kind of impacts that would create on that- you know in the residential neighborhood area right there. So, we are really limited to, to Tweedy.

Richard Rangel: Ah- thank you.

Fortunato Tapia: We'll take our next question from here.

Unknown female 2: Ah, - okay, you said that, you, as far as the traffic concern that you guys looked at where it would affect big intersections. Why not use information given directly by the schools? Because I'm in Design Class with Miss Holland [ph] and we been out there like for two (2) hours a day for like, multiple weeks actually doing the calculations and counting the cars, the students, the bikes, the trucks, the big rigs that come down from the companies. So, we have real numbers. So why not use our information instead of... what affects the intersection.

3

Ed Paek: Ahm... that's a great question. You know, we totally understand. You know, the localized ah- [LAUGHS] the localized impacts of traffic. But again, we are kind of- we use the standard that is given to us by the City of Southgate ahm- because you know the school is, is located in the city. We have to use their chorology ahm- and unfortunately yeah, their methodology doesn't focus on localized impacts. It does focus on the... you know, the larger intersections throughout the city and that's what kind of what SEQA requires us to do.

[BACKGROUND: Voices (U/I).]

Unknown male 1: We hired a Traffic Consultant.

Ed Paek: And, and just to remind you ahm... as part of the Traffic Analysis we did hire a Traffic Consultant that prepared the ah... Traffic Section, of the Traffic Analysis... ahm...

Unknown male 1: And they do counts.

Ed Paek: Yeah, and they do counts as part of that. Again, that's... at the intersections of the school where the, you know where you experience the traffic congestion.

Unknown female 2: I wanted to ask, who is Legacy Lane open to?

Ed Paek: Ah, so, when it's constructed?

Unknown female 2: Yes.

Ed Paek: It will be public right of way. Yeah, anyone will be able to use once it once it's completed.

Unknown female 2: And its access to our school also?

Ed Paek: Ahm- yes, yeap and I think, I don't know if you want to talk about the parking?

[BACKGROUND: Voices (U/I).]

Issam Dahdul: So, so in general yes. Legacy Lane will be available; it will be a public street. Just like Tweedy is a public street. So, cars will be able to travel through it. There will also be parking on the sides as well, so if there is any overflow. Or if you have you know, if you have any Campus events the people will be able to park along Legacy Lance as well for the school.

Maria Soto: My name is Maria Soto and I also have a question about traffic, ah- and you probably get a lot of those now. Ahm- my question is, when was the EIR conducted, ah- we've had recent developments and we do know that traffic has increased. So, I would like to know when this is conducted and If it's, you know, ahm- if, if it is still valid for what is going on right now? And my other question is around, because one the, the street is closed to Tweedy. Will there be any [PAUSE] ahm- this street that's going to be closed right here? Will there be any bike lanes or anything to help mitigate all of the car traffic and maybe help us with student's ah-transporting to the, to the school? Because traffic, is an issue. It's an issue that is increasing in the community. I have been a resident for over twenty-two (22) years and ahm- I understand that from the student's

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perspective as well as residents. We want to make sure we are all getting to where we need to get and the traffic that I am referring to, it's not the localized traffic. But the traffic that is at intersections that is also increasing.

Ed Paek: Ahm... so, to answer to the first part of your question, ahm... which is when the Traffic Analysis was conducted? So that analysis was conducted, I believe last summer by our Traffic Consultant, they did all the counts, ah- you know, they looked at traffic volumes ahm- and the way they look at it is, they, they- take the existing traffic volumes and then they project how much traffic that this project would generate and they use that as a base for their analysis. Ahm... ahm and I should, I should also mention when preparing that report, we actually coordinate with the City of Southgate, so they tell us kind of what other development projects are happening in the area. Ahm- and they give us a list called of the Related Projects ahm- which includes you know, projects that are in development and projects that, that will be developed foreseeable future. So, the traffic analysis takes all that into consideration. Ah- so it should you know, hopefully include you know, some of all the new developments that you mentioned. Ahm- with regards to bike lanes, there will not be any bike lanes on Legacy Lane ahm- Is that right?

Unknown male 1: Yeah, that's correct Issam?

Issam Dahdul: So, Legacy Lane itself does not have a bike lane, but it is going to be a very large wide street and I don't know the dimensions ahm- of how many feet it is, but... sixty (60) right?

Unknown male 1: Yes, sixty (60).

Issam Dahdul: Sixty feet. So, but it does not have a designated bike lane necessarily.

Unknown female 3: It is adjacent to the River there... are you guys aware of that?

Issam Dahdul: Absolutely. We are aware, there will still be access auh- through coming around Legacy Lane up to Birdis [phj].

Unknown female: 3 But there is no bike lane ...

[VOICES OVERLAP]

Issam Dahdul: There is no designated bike lane. But again, the road itself will be sixty (60) feet wide. Which is a relatively large street.

Unknown male 2: Of river?

Issam Dahdul: It will, it's in public street and will be open to the public at all times. It's never going to be closed off.

Unknown female 3: So, that would be a suggestion because we do have a lot of young people traveling down that area ahm- they might be traveling to school. I don't know if you're going to be adding bike lanes into the parking area? But, that would also be a suggestion because at this point, if traffic will be increased and we don't have bike lanes or any other remotes of transportation for, for young people then we are not mitigating, we're increasing traffic- I'm thinking of alternatives.

Issam Dahdul: Thank you.

[PAUSE]

Unknown female 4: Okay, I actually live two (2) blocks away and I was wondering If, the City of Southgate will be opening the, the blocks where they have... where the alley's at? I'm not sure what it's called.

[PAUSE/BACKGROUND: Voices (U/I).]

Issam Dahdul: Oh, I know what she's talking about. So, are you on the Southside of the Legacy Lane or are you on the Northside of the School?

Unknown female 4: We live on the Southside.

Issam Dahdul: On the Southside.

Unknown female 4: Like...

Issam Dahdul: So, so, my understanding is, I mean you're talking about the bollards *[ph]* right? There's these?

Unknown female 5: Right here.

Issam Dahdul: Like... so, you can't drive a car. So, so right now, it's limited you are not allowed to drive a car from this neighborhood up here. My understanding, is it will remain as is. I don't think the city has any plans to remove those bollards *[ph]* in the future. But, it's something that you can ask the city. As a community, I think there might be mixed feelings...

Unknown female 5: Yeah.

Issam Dahdul: Some of the neighbors may like it and some may not. As far as I understand no plans to remove those bollards to allow for cars to drive through on to [U/I].

[PAUSE]

Issam Dahdul: Yes.

Unknown male 3: Yeah, hello. I, I have a question, once again, to be on track, I apologize.

Ed Paek: No.

Unknown male 3: My one concern is, of going back to the statement that was made by, by Mr. Issam.

Ed Paek: Issam Dadhul.

Unknown male 3: Issam Dadhul, thank you. Ah, you had mentioned that Legacy Lane would be opened to the public at all times.

Issam Dahdul: Yes.

[PAUSE]

Unknown male 3: My concern is, on both drop off and pick up. If that lane, that street is open during- to the public. During ahh... the drop off and pick up period times ah- will that, will the way it's designed, will that basically bottleneck the traffic. If your using, for example, if somebody from Tweedy wants to use Legacy Lane for whatever reason, and we have all this traffic from here, brothers, sisters whomever it is that is picking up, their students from both sites. How do we alleviate that potential bottleneck that it's going to create? Essentially, you're looking at about three (3) lanes of traffic in a two (2) lane street?

Issam Dahdul: So, good, good questions. So, ultimately Legacy lane that is being built so that the two (2) Industrial properties to the South of the school which is this and this...

Unknown male 3: Correct.

Issam Dahdul: ...can then access exit either on to Chakemco or they can choose Tweedy obviously. We hope that they will try to avoid this intersection here and will exit out to Chakemco from here. So... there we don't anticipate and I

don't think that the Traffic Analysis anticipates a lot of cars coming in to these businesses. In general, it's their trucks that's are coming in and out. There are Industrial properties and they are ahm- operating business. Ahm... so, does that answer your question on that? I don't know if there was a second part of your question?

Unknown male 3: Because, because the time of drop off going inside...

Ed Paek: Thank you.

Unknown male: 3 ... with the time of drop off coincides with the beginning of their business day. So, I'm assuming that, that the beginning of those two (2) business there. Ah it will be possibly at the time that the students are starting to come into the school. And my point is that, whether use the other street or not. There's still going to be that bottleneck created due to the fact, that there is so much volume coming in, even if there is two (2) streets that they are using to come in. It's- we have to think of all of the workers, in those two (2) businesses. The supplies that goes in and out of those businesses. On top of that, all students moving in and out of the facilities that are being proposed.

Issam Dahdul: So, so I guess a couple of things, one (1):
In terms of the number of students now, since we are adding students, the hope is, one (1) is, some of the students, have siblings that are already coming to the High School.

Unknown male 3: Correct.

Issam Dahdul: So, it's not like we're adding or we don't believe we are adding for one hundred and fifty-nine (159) students. With that said, we, we are adding traffic. There's no way around this. So, in our design ahm- let me go back ahm... [ASIDE: Can you go back, I don't know if this working, go to the... the Plan Site for the School.] So, what we are designing though, is a cul-de-sac. This is ultimately, and it's hard to see it here. But it's really three (3) lanes. You're right, it goes from three (3) lanes into Tweedy and there is a little of bottleneck. That is something we cannot avoid. We did our best, understanding that traffic was a huge issue when we started the project that we wanted to provide as much space and we gave up a lot of space in front of the front of the school of the property that is right across the street. In order to build this huge turn about to allow, ultimately what turns out to be three (3) lanes. It's two (2) lanes plus an internal drop off that comes back ah- in order to have that space. What, what can be done is, a lot is operational right? So, could you... stagger the times from the start times for the school, you've got three (3) schools and

now, you've got a Middle School. That's one option. In terms of the business, we can't control what the business do sincerely. But, as good neighbors you can reach out to them. I think inherently they are probably also want to... and I don't think, they're smart people. They are not going to have their trucks coming out. And the last thing is, and just going into ah... can we go back to... aerial? In terms of this signal, that we are, we're proposing as part of the Traffic Analysis and you saw the design. A little bit hard to read. I believe this is Atlantic, this is Tweedy and this is the road Chakemco. Ultimately this intersection, will severely impacted because there is no ahm- signal. So, you could get stuck at a Stop sign and then be waiting for people to come of this is Wright Road goes to Atlantic where you can make a right turn. So, we're hoping that, that this solution of this signal working with the City of Southgate to install it will allow this to not to bottleneck and provide another way for, for people to get out. Whether it be the businesses and be able to flow out without having to wait for Atlantic traffic to stop. So, it will force the traffic to stop as well as if people do choose to turn down, not to come out of here and, turn, turn this way, then they will be able to get out relatively quickly. Thank you.

Unknown male 4: Hello, I live in the City of Cudahy, when I'm coming though Tweedy to, to Atlantic, I'm gonna make a left turn on Tweedy, there's going to be a big problem with that light. Ah- there's already a big problem with the light turning left on Atlantic.

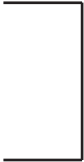
Issam Dahdul: Okay.

Unknown male 4: You said both schools are going to be coming through to Tweedy [U/I].

Ed Paek: So, ah- one of the things that will happen once we install the Signalization Program at, at Atlantic and Chakemco is that, all the lights would have to become synchronized. So hopefully one of the things that the mitigation measure will do is, synchronize the lights better and, and hopefully improve that flow that left turn into Tweedy.

Fortunato Tapia: And then before we take your next question, I want to acknowledge that we have Cadena del Poza [ph] with Dr. Rev Rodriguez office here today, your Board member. [U/I]. Our next question comes from this corner and then, we take yours.

Unknown male 5: Okay, ah- my question is regarding the ah- this company that is here Steel Company, was there a plan to buy this out at all or will it remain there forever for the time being at least?



Issam Dahdul: I'm not aware of any plans of buying them out.

Unknown male 5: Okay, so the plan is, I'm assuming that the purpose of this street here is from this way is for the heavy traffic to come through here and the company to go this way, right?

Issam Dahdul: Yes, there's two (2) the Steel Company and then there's the Right of way Express which also has trucks coming in and out and to yes, it's for them to come in and out and ultimately, we will be building a new road. Right now, Adela is open and Chakemco is open which is here. The District owns this piece here, this piece here and this piece here and right now there's a road but you can't really see it. But a road here and a road here. And this is Chakemco, this is Adela. So, in order for us to close this off and make it one big property, to make it all one big school and we're actually going to have to have to close Tweedy off back here too and we will build a cul-de-sac here. This, it will still look like a street, but there won't be cars driving through, the LAUSD will own this piece. We'll, we'll be able to have cars come on, if you wanna park cars or, it will an operational issue or if you have buses for after school, or whatever. Ah- but there will be traffic coming in and out and it will be fenced off for the District. But ultimately, this road is being built. And it was originally part of the school when it was built. So, that we can close these streets off, and make it all one big property.

Unknown male 5: Okay, so ahm- going back to, there's, there's a bollard [ph]that blocks the exit this way. So, so you can't guarantee that's not going to be removed? It has to be the city?

Ed Paek: The City of Southgate, my understanding there are no plans the City of Southgate to remove them and the District does not have control over what happens with those, with those bollards.

Unknown male 5: And going back, to this site here this bottom part here, so this is going to a field ah?

Issam Dahdul: That, that particular area is basically just going to be landscaped.

[BACKGROUND: Coughing]

Unknown male 5: Just landscape... okay. Ahm, is there going to be a certain part will be a... some kind of [BACKGROUND: Coughing (U/I).] football field or anything like that?

Issam Dahdul: So what we're building it's not shown here because we are focusing on International. But, but in this area, here, there will be a Baseball field, and two (2) Softball fields.

Unknown male 5: You said right here?

Issam Dahdul: You see this big square here?

Unknown male 5: Oaky.

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[VOICES OVERLAP]

Issam Dahdul: [U/I] and that work will start this summer. So, we've got the plans approved and we're hiring a Contractor now so that we can start building land fields.

Unknown male 5: Now, now usually those types of fields have a pretty high light, really bright lights. Is there any way gonna affect coming this way, that we're we're going to have lights really bright lights coming to the residential areas?

Issam Dahdul: So, a good question the lights are usually [U/I] in and away from any residences that are nearby. As a part of this study, we did study the possibility of having lights so, it is included in the Environmental Impact Report so, let me take a step back. So, when we designed the field we, we did not include lights, it's not part of the budget. It's not funded as part of this project either. But, we know that maybe at some time in the future, someone is going to want us to put lights and so we studied it as part of this Environmental Impact Report to see what the Impacts would be on having those fields lights and that is included in the Report.

Unknown male 5: Okay, another question, ahm- in the morning, both schools start the same time? Ahm- is that correct, both schools start at the same time?

Issam Dahdul: I'm going to look back at the Principals back there and let them answer that.

Unknown male 5: Okay, got it.

Gina Howdy: So, ah- I'm Gina Howdy the Principal at International Learning Center and I'm on two (2) different sites. My Middle School is three (3) miles away. And so, I've waited eleven (11) years to finally get my schools together. So, I'm really glad [U/I] one of my Middle School students [U/I] and I don't have to drive to go to my other school. So ahm- but I really do

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appreciate the comment I got because I know there's impacts on the traffic. I think everyone here is concerned about the traffic. So, what the Principals wanted to do was, ah- change the hour when we come in and leave and for the last couple of years International has started earlier from seven-twenty-five (7:25) to seven-thirty-five (7:35) and so we are going to continue with the early schedule. Ahm- Steams starts about eight o'clock (8:00) or ten to eight o'clock and next year Valpa is actually going to start a little later at eight-fifteen (8:15). So, we're actually doing that, to avoid the traffic. Because we understand on the road here we're all living it every day. And I appreciate that. Ah... no, we are not going to start at the same time.

Fortunato Tapia: The next question comes from this one.

Griselda Solis: Hi, ah- my name is ahm... Griselda Solis and I'm a counselor at Valpa so, my concern is, a little different than traffic and it has to, to with traffic, in sense that it's traffic safety. So, you guys mentioned that you are going by something that... regulations with the City of Southgate and you are studying the intersections at Chakemco and Atlantic and Atlantic to Tweedy. My concern is the drop-off and pick up sites. Because I'm not sure how we're managing for pedestrian traffic the pick-up and drop off with the children who tend to be kids running in the middle of traffic. I almost hit a couple of kids. I've also been at the hospital with a kid who got hit by, by one of our LAUSD employees. So, what are we doing to ensure the safety of our students? Because ultimately whether humanistic reason or completely, litigious reason. This can be very expensive and makes us look really bad. So, what are we doing to protect our kids? Aside from the city. If the city is not making us do it, what are we doing?

Ed Paek: So, again, I'm with the District's Office of Environmental Health and Safety and we have something- you know that is something that is important, important; to us, pedestrian safety. Ahm- in terms of ah-mitigation, so, you know, most of th... the traffic concerns are pedestrian safety concerns should be addressed by having this drop-off ahm- you know, by having dedicated drop off lanes you know for the International Studies the Middle School and for the Legacy High School Complex. Ahm... you know, that's, that's one way. Of course, we cannot control, you know, kids running across ahm... you know, on their own... ahm... one of the things you know, we usually do, it's not a requirement but we usually try to have staff out there to try to control, you know, if that, does become an issue, ahm... to have out there. Obviously staffing you know is difficult...

Griselda Solis: I'm not saying, was there ever a walkway in the middle?

[VOICES OVERLAP]

Ed Paek: Okay, actually.

Griselda Solis: [U/I].

Ed Paek: It's a very good question. So, there will be a fence along here. That will prevent students from running across the street. So, they will be forced to go around on the sidewalk. They can't just cut across.

Griselda Solis: You see, in that [U/I] when you're five (5) minutes [U/I] there is no way you can have something in the middle?

Ed Paek: No, no, I'm sorry, I said there is something in the middle. There, there will be a fence. From here to there.

[BACKGROUND: Male voice (U/I).]

Griselda Solis: No, I meant going across, a fence. Oh, I'm sorry, I meant some kind cross walk from the Middle School to the High School. Or are we trying to keep them completely separate?

Ed Paek: The... well, the... if you're dropping off if you have multiple students. If you have a student in the Middle School and a student in the High School, I would anticipate that you would probably drop both of them off here and then the kid is going to walk around this way or you can just drive back around drop off on, on the Northside as well. I mean, there is no way to prevent. You can either walk or...

[VOICES OVERLAP]

Griselda Solis: [U/I] design in a different way. To have child make it to class on time and prevent accidents.

Ed Paek: Thank you for your comment.

Unknown male 6: I think she's talking about, a student going from a class on the Southside to the Northside?

Ed Paek: Oh, [BACKGROUND: Voices heard (U/I).] my, my understanding and, and in talking with the Principals, the Middle School Students will be here.

Aside from any special events that they're going to need to come over to the High School. They, they're not taking classes necessarily or at least the majority of them will not be taking classes at Legacy High School. Or at the High School portion of Legacy. They, will be here at the Middle School. So, it's not like they have five (5) minutes to walk from here to the class there. They're not going to be doing that.

Gina Howdy: I'm sorry, ah... so just to answer that question. The Middle School is South contained the class, like we were just mentioning my Middle School is three (3) miles way. And I have my own teachers, administrator, everyone is there, so the Middle School is going to be South contained with the own Administrative Office, Library, everything will there so that they don't have to cross the street.

Unknown female 6: [U/I] a ten (10) year old has to cross the street.

Gina Howdy: So, I shouldn't have anyone crossing the street at all. Because if they are coming to the Middle School, they'll be dropped at the Middle School and should not be crossing at all to the Middle School.

Unknown female 6: There's going to be that barrier, correct?

Gina Howdy: Yes,

Unknown female6: It will be similar to what is in front of Southeast?

Gina Howdy: Correct.

Unknown female 6: So, we're not going to have a ten-year-old, my brother is there, and go across.

Gina Howdy: You would not have it because, because of them walking, so thank you.

[PAUSE]

Sheila Bottle: Can you go back to the other map?

Issam Dahdul: Sure, can you help me.

Sheila Bottle: That one, Chakemco, Chakemco.

Issam Dahdul: Chakemco.

Sheila Bottle: Chakemco.

Issam Dahdul: It took me a while.

[BACKGROUND: Laughing]

Sheila Bottle: Chakemco *[ph]*. My name is Sheila Bottle and I'm a sixth (6th) grade Middle School teacher for International Studies and, I've at several of the meetings. Each time, I come and learn more and more. I know which questions not to ask because it's quite repetitive of me and I have learned quite a lot.

Issam Dahdul: Thank you for coming.

Sheila Botte: Thanks for having me. Ah- my question is, again, this is our project site. The teacher parking is in this area, right here, right?

Issam Dahdul: Yeah, that is correct.

Sheila Bottle: Right? And this is Chakemco *[ph]*.

Issm Dahdul: Chakemco

Sheila Bottle: Chakemco. [LAUGHS].

Issam Dahdul: It's okay, just go, you can call it whatever you want.

Sheila Bottle: Chakemco and... the student, we would drive down Atlantic onto Chakemco and, could we come this way and enter the teacher parking area. That's my first question. Secondly, if I don't have a child at the High School but I only have a Middle Schooler here. Ah- I would be more as a parent more inclined especially if you come from this direction, to turn down to Chakemco and drop my kid off here. As to opposed to, going to this prescribed drop-off point.

Issam Dahdul: Yeah.

Sheila Bottle: What will prevent those parents, especially when one or two moms or dads with one or two kids in the car solely going to the Middle School. From figuring out that the teachers are going this way. I'm following the teachers, so just go here.

Issam Dahdul: Yeah. The difference between a teacher and parent. Is, the teacher is going to be here all day. Which means they're going to pull in to teach and then leave in the afternoon. Where as a parent, oh yes, they could do

that. It will be hard to prevent them. However, once you turn, if, your heading North on Legacy Lane you either going to make a U-turn which will be illegal, that's one.

Sheila Bottle: There you go.

Issam Dahdul: And the second, if you a stop here.

Sheila Bottle: Right.

Issam Dahdul: And then try to make a left, to get out on to Tweedy. Well, you've got all these cars coming...

Sheila Bottle: [U/I].

Issam Dahdul: So...

Sheila Bottle: That's what I mention.

Issam Dahdul: So, we are encouraging...

[BACKGROUND: Laughing].

Issam Dahdul: ...folks [BACKGROUND: Laughing] to... by adding a huge drop-off in the front of the Middle School, a huge drop-off in front of the Middle School, and huge drop off on Tweedy, there will access. On every school, there's tons of traffic.

[VOCICES OVERLAP]

Sheila Bottle: [U/I].

Issam Dahdul: And I do understand a lot of traffic here on Legacy Lane and nobody can deny that.

Sheila Bottle: Right.

Issam Dahdul: And nobody will ever say that otherwise.

Sheila Bottle: Right.

Issam Dahdul: However, we've done the best that we can in terms of trying to accommodate the known traffic issues here and by having a big drop-off on either side. Now, human nature is human nature, people will try to

find the shortest way of getting there. However, if it is illegal, then the school can tell school police to issue tickets. I see the principal has her hand up and she...

Principal: Well...

Issam Dahdul: Did you want to say something to help me out?

Principal: You look like [U/I] Chakemco where we are at right now at Southeast Middle School where we are currently housed ahm- we have parents, let's pretend this is Alameda. Ah- parents are coming in... we have parents coming in Alameda, here and let's pretend this is Wisconsin, of that- Southeast Middle School. Okay? What we current have right now is coming up Alameda turning on Wisconsin we have kind of a loop thing going on and traffic control happening in back of Southeast Middle. So, it's, it's a whole traffic activity in the back. And here, I foresee that happening here in the front, front of the High School, and in front of the Middle School. But if this were visualized south Wisconsin, Southeast Middle. There would be a whole traffic ah, ah I guess a mediation going on back here. That's what we're going through down the street. And as parent, I would be doing this. I would do it, I would not go here, I wouldn't do it.

Issam Dahdul: Thank you.

[PAUSE]

Sheila Bottle: Ah, so I'm sorry, one of the things Issam keeps referring to, is that, there is a large area where there is a drop-off. And, I don't think we can see it and I know it because I've been in so many of these presentations and we have asked that a really focused area. What you do not see or you cannot properly imagine, is exactly how bad that has been widen to about to three (3) rows on each area. We don't have that right now. We have two (2) rows going up and two (2) rows coming down. But they are making third (3rd) one. So, that's the drop off so there are actually three (3) ways. And we can't really see it there. But, I think that's what he keeps referring to. Again, the problems of traffic, we're going to have and that's why with the Administration we are trying to, but in different types. But what we don't quite see there is, the two (2) lanes plus the drop-off so becoming three (3) on each side.

Issam Dahdul: I also would like to point out, and if sorry cause I... can you go back to the aerial? Somebody asked earlier if there could be drop-off from Adela on the Northside for, for Legacy High School and the answer is no, because

there is no agreement with the city and its understandable well, folks that live in this neighborhood don't necessarily want people dropping of the students. But what is allowed if the staff wanted to utilize this for the parking lot and that is on way to take some of the cars off Tweedy and onto Adela for the Legacy High School. But that's an operation that the Legacy High School Principals will have to ah... agree on and maybe there's issues that make it not as palpable. That is also an opportunity, you know over a hundred (100) cars of Tweedy and on to Adela.

Unknown male 7: I'll make one comment which is, you really, really, do not want to mix a drop-off area here and a parking lot, very bad idea. So, if that begins to happen, the option is to put adult leadership or Public Safety Officer who can ticket and cite and that is generally effective at [U/I] auh- let's be practible. This is the real-world ah- there will always be people who try it. But, some things can be done to significantly discourage that.

[BACKGROUND: Female voice (U/I).]

Unknown female 7: So, I also want to add to the fact my school is six (6) thru twelve (12). So, my Middle School students have siblings in the High School and I'll tell you why, because I give priority to my Middle School students to come into the High School, and about sixty (60) families have siblings. So, we're looking at not adding that many more. The parents I have right now are bringing their younger children so that lot of our families are same it's not adding a lot more. We already have the families here they're just dropping off the Middle School and High School, possibly.

Unknown female: 8 Okay, my turn. Well, I have like a comment based on... you guys are going to make two (2) Softball fields and a Baseball field. Now, we already have a Softball field as it is and by making two (2) and a Baseball fields, I feel like it is really gonna work as much? Plus, a small Football field with kind of no space with bleachers. I see you would make the Football field bigger and get more space with bleachers rather than making more Softball fields, when we already have one here. Also, if there would've been auh- a pool because we do have a swim team here. They have to go to Southgate to go to the pool. And when they could just have one here. Or of course just also a Soccer field. So, we are focusing more on the Baseball and Softball when we already have one they should give more to the bigger sports.

[APPLAUSE]

Issam Dahdul: Thank you.

Unknown male 8: Okay... you guys seem kind of young... so [BACKGROUND: Laughing.] Let me bring you back to [BACKGROUND: Laughing.] when you guys started this project. You guys were thinking about putting an alley back here and you promise us on Wood... W-O-O-D just in case you don't know, there's also a movie called Wood, it's a good movie check it out. Auh-you guys promise us to fix the street here and it hasn't been done. You know, I think auh- did someone mention "Fortuno" or something?

Fortunato Tapia: Mmm.

Unknown male 8: Is that you? Who is the liaison on the flyer?

Issam Dahdul: Fortunato.

Unknown male 8: Fortunato, with all due respect. Okay, so you are the liaison with the, with the....

Unknown female 8: Flyer.

Unknown male 8: ... me, or the community, right?

Fortunato Tapia: [U/I] Community Relations Department.

Unknown male 8: Okay, well you guys promised us to fix the street here. So, here's my question, the City of Southgate says "Go see the City Clerk about that funding to fix that street." Because I noticed that on the side where all the Council Members, those streets are fixed nice. Have you checked those out? Oh! Aren't they nice! Ouuu! Oh, my goodness! I drove over by Long Beach and Firestone and that's a nice street. And you know what he says? "We never fixed that street." "Really?" "I said that's where the girls used to strip at the corner remember?" [BACKGROUND: Laughing.] I said that street right down there, you guys fixed it all up. It's all knocked down now. With the respect, we have parents here. But ahm... it's all fixed up and here we are on Wood and nothing being done there. So, who do I speak to about the funding? That they promised about the street and you guys are worried about doing a street over here huh? Well they haven't done anything to our streets. So, I'm wondering about this street that they're talking about fixing. Who, who would be... who would talk to auh... would that be you sir? About the funding that was supposed to come to fix that? Because I'm curious, if you guys gave them the funding and they're using it somewhere else, that's my issue. And, then also right here on Atlantic, when we wanna make a left, oh my goodness! Oh, my goodness! There has to be like a, like a you know where you can't you got leave this space open? Because when we try to make a left,

ahm... we're sticking out into the traffic going North. So, we're sticking out. So, ahm... that's dangerous because this lane to make the left. The only way that anybody let us in in that lane where everybody making a left, so ahm... if you guys were able to make more time for this to make a left and we could sneak in there. But, if you were to leave the little space open, so we can make the left right there and get on the far-right lane. Because we still wanna go South. We don't want to go to Tweedy. And I think it's a great idea, since the Principals here to ah- work out that parking through Wood. We like teachers come on down on Wood [BACKGROUND: Laughing] you're gonna fix it any way come on down! I mean we have no problem with teachers coming down though that, Adela right there, we're working that parking program. Because, we love teachers [BACKGROUND: Voices (U/).] You know, I'm not like those guys at six-forty (6:40) that don't like teachers. At six-forty a (6:40) a.m. They don't like teachers. I like teachers. I'd like for them to sit down with thirty (30) students for just ten (10) minutes.

Unknown female 8: Yes, sir.

Unknown male 8: God bless them.

Unknown female 8: Thank you.

Issam Dahdul: Okay, so to answer your question with regards to Wood being paved? Ahm... I think after the meeting we can talk to... there's a Representative here from the City of Southgate and we can talk about that in terms of the timing and what not happened.... Okay?

Unknown male 8: Okay, thank you so much.

Issam Dahdul: Ah... but it's not part of this project. Yeah just to be clear, that's part of the International Learning Center and this is something that was done as part of the original school discussed and to be honest, I don't recall exactly what was promised or not promised of the original school. We have to talk afterwards

Unknown male 8: Okay.

Issam Dahdul: Thank you.

[VOICES OVERLAP]

Unknown male 9: [U/I] I'm a student at Legacy-Valpa I'm just wondering, what time will the Middle School come up? Because some students at Legacy ah- they take

the bus and if you miss the first bus, ah- you'll be taking the bus like at three-twenty (3:20). So, I'll be getting home like, I live in Bell and I'll be getting home at like... probably four (4:00). And, if you add on more students I'm pretty sure kids at the Middle School ahm- they are going to take the bus too. So, as the bus gets over packed, the bus driver [U/I] so, I'll be getting home possibly like at five (5:00) and I can't be getting home at that time.

Unknown female 9: So, I know you might be graduating by the time the Middle School's here, honey. But...

[VOICES OVERLAP]

Unknown male 9: Yeah by... [U/I].

[VOICES OVERLAP]

Unknown female 9: And the rest of the students are here. So, right now, the schedule for next year is two-forty-two (2:42). But it doesn't impact you because you're with in the Southeast Middle but by two-forty-two (2:42) to answer your question.

Issam Dahdul: So hopefully, they catch the earlier bus, I don't know if there's a bus at two-forty-two (2:42).

[BACKGROUND: Voices (U/I).]

[PAUSE]

Unknown male 10: Okay, question of traffic. Three (3) lanes is great right there. But if you are going East on Tweedy to Atlantic, there's three lines in three hundred (300) feet. Okay, there's two turning lanes and one (1) only goes straight. If traffic is backed up in the school, how about from Atlantic, towards the park?

Unknown male 11: Yeah.

Unknown male 10: Once traffic get up there, you are stuck there. You know, anything gonna get done about the three (3) lights there? Any more turning lanes or going straight?

Issam Dahdul: We are not doing any as part of this project, there are no improvements to... the only improvements that are being done along Tweedy and not from the School. As I mentioned earlier the sidewalk will be installed on

the Southside. [U/I]. So, here's Tom's Burgers so if on the Southside, there will be a sidewalk. Bu, only that...

[VOICES OVERLAP]

Unknown male 10: But it will only be one (1) lane going straight.

Issam Dahdul: The number of lanes will not change along Tweedy, between the school and Atlantic as part of this project.

Unknown male 10: So, that will be a big traffic jam right there.

Issam Dahdul: Yeah.

Unknown male 10: One lane going [U/I] yeah.

[BACKGROUND: Voices (U/I).]

Unknown female 11: The sidewalk is going to be along Chakemco?

Issam Dahdul: Chakemco... There are no improvements as part of this project along Chememko. So, what I [U/I].

[PAUSE]

Unknown female 11: So, traffic is a big issue. It always has been even when they were planning Legacy School. I live on Wood, I have three (3) different drop offs in the morning. Ahm... and I can tell you as a parent, from Tweedy Elementary as a to Legacy High School and as a parent to a Middle School, I have three (3) different drop-offs in the morning and traffic is backed up all the way to Tweedy on Pinehurst ...

Ed Paek: Yeah.

Unknown female 11: ...I make a left to drop off my other Elementary School daughter and try to make it back to the High School and even to drop-off you know down across, across town it's, it's very hard, because the traffic mitigation has not been taken care of at Atlantic and Tweedy. And you have to understand, at the neighbors on Makala, Dunkin, Adela and Wood have a huge impact and all of our students are kids go to three (3) schools. There are four (4) that traffic jam affects all of us. And if the school District isn't taking into effect that you're basically ahm... gridlocking us into a small ahm... Tweedy- Atlantic intersections and we, we don't have a way out. And that is on a normal day. What happens during an emergency? When

all the parents are going to be frantic trying to get to their students? So, those are things that, I don't think that the District has thought about. I think that the city has thought about either and as much as I complain to the city and to the School District. Our voices aren't being heard. That's, I think is the biggest frustration out of everybody and I feel bad for the teachers that have to be in and out and stuck in gridlock. You know, because I know most of these teachers as well. But as a parent I can get to work by a certain time as well. I don't think that everything is being addressed and I think the EIR needs to take all that into account.

[APPLAUSE]

Issam Dahdul: Thank you.

Unknown female 12: Okay, I just have need some clarification as Dr. Jauregui mentioned. That ahm- some of our students will get priority earlier, and you mentioned this was a Public School and would be open to everyone. So, I would like some clarification on that. And also, support the, the one of the students mentioned and thank you so much for bringing it up. If you're going to graduate that you are thinking about siblings and other community members. I think we all should be thinking about that. And also, public transportation, when I think about what other alternatives besides cars? He brought up a really good point, we have public transportation that will be bring students back and forth that is adequate fits everyone that alleviates some of the traffic.

Issam Dahdul: Thank you.

Unknown female 13: Ahm... back to what the Principal of International was saying about, like I really don't think you guys make this because, I don't think you guys like have [U/I] just even if we do or don't there' going to be traffic regardless. I think you guys should talk about it more and wait till you guys have cause basically like what I'm hearing often it's going to be one way going down there's going to be a lot of ways coming in but going down, there's going to be like, one way out, that's what I'm hearing. I think you guys should talk it over more and like get to the traffic situation because, like what she said she's a parent and she has to take her kids to different schools, so does my mom and she goes to on school to another and I feel you guys should really talk about the traffic.

Issam Dahdul: Okay, thank you.

Principal: For clarification, ahm... the reason why I say it may not impact you right now and I'm saying to next year's schedule. So, it does not affect him personally. Definitely one of the conversations that we as principals have

had, how do we alternate the times because this is reality. I mean it's affecting all of us. But I wanna clarify the issue of school. International Learning Center, it's public school and we've always will be a Public School. We service the Southgate community. International Learning Center is not a Middle School, it's a six thru twelve program. So, like any school you start six grade, you go to the seventh, the eight the ninth, tenth, eleventh and twelve. I have a seven (7) year program, but because of our mind reality right now, and that means being in Southeast Middle-three miles down the street and being right now located in Legacy Complex. My Middle School student as much as many would love to come, they can't' because they are three miles away and the parents feel that they can't bring them all the way over here. So, they feel they need to stay in the area in Southeast High School. So, because of that...

[BACKGROUND: Unknown male (U/I).]

Principal:

...that's right, they can choose to do that, but because I'm... they're the same school, I'm the same principal for both. When I say, it has priority, is right now Southgate has what we call the "Sonner Choice". And that Sonner Choice allows eighth graders to choose a High School. Well, if they choose my High School because they are my kids, right? Sixth thru twelfth automatically they are in my school. They don't need to go anywhere; so, they automatically mine. However, the students who choose to stay in Southeast Middle School or Southeast High School, because its closer to home and we understand that. That opens up the door for other ninth grades to come into the Legacy Complex and specifically, the Intentional Campus. But ah... as far as the Middle School, any student from Tweedy Elementary or from any other school comes to my Middle School. And from there they're guaranteed for seven years. Graduate them from High School but unfortunately because of the distance right now, they have priority obviously, they are my students but they may choose to stay there because of the distance. Just for clarification for the International part. But ah, and I appreciate the comments and all, but I have to tell you, we're not building a school, and these are the words of ahm... our former Superintendent Ramon Cortines [ph], "we're building a school for Middle for International because it's a nice thing to do," we wanna have a nice Middle School here, it's a need. Meaning, that the International is a sixth thru twelfth program. So, I'm gonna take you back history, someone said history. International was supposed to be here sixth thru twelve that Valpa and Steam was not supposed to be here. They were supposed to be in the Maywood School that wasn't built because, it wasn't built on time. It will have built for this. Ah- this coming year, so we had to give up, my Middle School had to give up the spot. Because we had two (2) other school's programs that were

going to start? So, we left the Middle school behind and brought the High School to this Complex. And we've been waiting so long that now finally we have our Middle School coming here. But, totally understand everyone's concern. Because everyone is concerned including my teachers who already expressed their opinion and they're concerned about the traffic. We've been as vocal with them and with the program and that's why they added another lane and that's why we continue to work and try to find different ways that maybe even the City of Southgate someone was talking about turning left and turning right. The Principals go to the Safety Collaborative for Southgate and we have this discussion. You know, we're having this issue. So, they study us, they study the case and they see how many people are turning left. Because obviously, there was no Legacy Complex. So, they had to change the Tweedy, I mean, the Atlantic site. They had change the time. So, that it would time for the traffic to turn left. So, they been doing some changes and obviously when the Middle School parents come, or when the students come. They'll probably look at it again. Because yes, as, as many parents that are the same. We're still dealing with a... big program with hundreds of people who will be coming here. So, I, I appreciate. But, but I hope I answered your question, we are a Public School and anyone can come. Thank you.

Fortunato Tapia: Thank you.

Unknown female 14: Ahm... my question is, this project finalized?

Issam Dahdul: The project is not approved until the Board of Education approves it. So, in June we will go to the Board of Education and we vote for Board members ahm... and Ref Rodriguez is your representative and we go to them and we present the Environmental Impact Report and we present the project for final approval and at that point, that's when we start construction. But we cannot start construction until after the project is approved by the Board of Education. Which we anticipate will happen in June.

Unknown female 14: Do we get a say in whether or not it is? Because I feel like, the only opinions who really should matter are the people who are directly affected by it. Like I know, I'm not gonna be here when it built. But for the future of Valpa, I really you know like me going through it now. I would hate to see future kids have the problem that I'm currently having without the Middle School there. Like also, Abraham was saying with public transportation. I don't get... it takes me an hour to get home. I also stay in Bell. So, that is a big problem. And then I know kids who ride bikes, skateboards, kids who walk there's like so many other problems

that, it affects us. So, I feel like, our, our opinion should matter a little more whether this school is built the way it is being or not. I'm not saying that it should not be there, but the design, like is flawed.

Issam Dahdul: So, the answer is yes. You have a say at the Board of Education. When they meet to vote. It's a Public meeting and you're welcome to attend and make comments to the auh... the voting Board Members and support or against the project, or even to just even give an opinion about the project. At that time and then they vote. Based on the project and any input that they receive.

[PAUSE]

Unknown female 15: Our comments tonight are being recorded and will be part of the final EIR Final Impact Report that the Board need to consider for them to decide [U/I].

Gwen : You, as member of the public, have every right to access your Board Member or any of Board Members as well as Superintendent at anytime, anywhere you wish. So, you can send them a letter, you can call them, send an e-mail them or whatever directly as well as going through the Environmental Clearance Process such as which is what we're doing today. So you have several methods you're able to use them or all of those if you want.

Ed Paek: As Gwen was saying, all the comments here tonight, all the you know, analysis and the in the EIR it's basically to form an informational document that is then presented to the Board Members so they can make an informed decision. So, you know, hopefully they will go to they will have their staff go through it. So you know, they will take all these into consideration traffic concerns and other Environmental concerns before they make final decision on the Project.

Unknown male 11: Ahm... I have a question, up here, ah, is there a wall that separates the road from the... the adding residence? Is there going to be a wall here a wall or fence, that separates us?

Issam Dahdul: I, good question. I don't believe there is a wall necessarily, but I believe there might be a fence. I don't recall the design right now on the top of my head. But there's definitely not wall, but there might be a fence between the two that prevents people from going...

Unknown male 11: Okay.

Issam Dahdul: ...to the easement.

Unknown male 11: And, and the other question, is, this, this right here is going to be pretty long and this one as well? Are you going to put speed bumps anywhere here? Because right now we have a problem with [U/I] we have cars that come and burn tires. So, with speed bumps up and down brand new road, where they have it here they can do that.

Ed Paek: There, there not any speed bumps along Legacy Lane that I am aware of. Like, like with any other street, there is enough of that's something that can be considered for the future, that part of the design is not included.

Unknown male 11: Do we come to you guys for this or the city?

Issam Dahdul: At that point, it would become cities responsibility the public road.

Unknown female 14: [U/I] building a road.

Issam Dahdul: We're building, so, so... just to put a perspective, LAUSD is building the road and then ultimately it becomes a public street and then LAUSD then no longer owns the road. It's public road just like any other street. But as part of our project, we have to build a road.

[PAUSE]

Unknown male: [U/I].

Unknown male 12: I have a question for the Principal of International. Ahm... so you know, how like you were saying that, because you basically had to kick out all your Middle School students from here. Because of us.

Principal of International: No, I didn't say that.

Unknown male 12: So, if we were to be building a Vapla School over there, would you be going against us?

Principal of International: So, I'm not against or for all I was just ah... explaining the case of... explaining to the parent, wondering why I give priority to the Middle School. And I was explaining that, International is not Middle or High School. It's a full program six thru twelve. So, that was an explanation of saying where one school which is basically on two (2) different sites. But, auh... definitely I... really appreciate Valpa and Stern being here, because

without you we wouldn't have a wonderful athletic program, because we share the Complex. I'm really appreciative of the fact that we are together. However, right next door, we're just going to have them Schools so that International continues to be a sixth thru twelve program.

Unknown female 15: My question is geared towards the Principle. Auh... I understand that there was an agreement when Legacy High School was built. Auh, I was part of those meeting as well. An, and I am affected because I live right on the other side of Legacy ahm- but, I do see it every morning. The, the students that come to Legacy High School, some of them walk ah, and they don't necessarily go all the way around on Atlantic they go up the Railroad tracks [U/I] bike lane. Obviously open bike lane but, I've lived in that area for over thirty (30) years. I've been there ever since I was in fifth (5th) grade. Auh- so, I know what happens up there and you know the River bank [ph] is not a safe place to walk for students. My question is, is there any possibility that Legacy High School can open their doors on the other side for those students. Not for parent drop off but at least for those students who walk from our community Maclowlow [ph], Ah... Wood, Dunkin into the Legacy High School Complex. Because it really is dangerous for them to go up ah... and into over the bike path. That is not a safe road for them. I personally have to drop-off my High Schooler because I don't want him to go that way and if that is a path of least resistance, he will take it and, I, I don't, I, I wouldn't let my children...

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Unknown female 16: We totally agree with you. It's not up to us, I think that was decision that was made before, and I'm wondering if that is something we can bring back to the City and see how we can collaborate and really make it where we can open up. But...

[VOICES OVERLAP]

Ed Paek: It's my understanding, to my understanding is, that the City is against having anybody drop-off a student on Adela. And as somebody that lives and I'm sure [U/I] that, what, what it wasn't supposed to do was not to make it hard for a student that was in the neighborhood.

Unknown female: Right.

Ed Paek: To walk in. So, you know, we can get clarification from the City. But I can't imagine they would issue of have an issue with students walking in- it becomes a slippery slope. Because if you open up the gates...

Unknown female: Yep.

Ed Paek: Then how do you stop parents from dropping off. People really that it's there. So, I think that's why the staff has probably never gone toward that. But I can understand the merits for the folks there, large community. So, I can imagine there's a large number of students that would walk and access from there.

Unknown female: So maybe if a parent from the community [U/I] with the City and try to figure it out. I agree, why are they trying to go around two (2) miles extra, just cross the street.

Unknown female: Right, I can tell you because I turn on Wood every day from Wood I have to make a left and turn onto Atlantic that parents are already dropping off of Wood. Ahm ... for students so they don't have to go into the grid lock on Tweedy. They're already dropping off on students on the corner of Atlantic and Wood. So, there's already that gridlock that's already affecting uh- at least those of us that live on Wood. So, I, I don't think that it's something new. I just think it's something we [U/I] up to and parents have students coming into Legacy and into the Middle School. I have to understand that, it's not a place for us to drop-off. That it's for the students who live in that community that they have the ability to walk to school. I live right on the other side on Wood, right close to the River bed and my son could walk to school, but he has to go all the way around and it's not a safe community but, you know, and I wouldn't want him walking ahm... through the bike path.

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Ed Paek: Thank you.

María Parra: *Muy buenas tardes. Ah... me llamo María Parra soy por parte de los Padres Unidos de Southgate. Cuando nosotros empezamos este trabajo de construir escuelas, fue hace diecisiete (17) años. Tienen los audiófonos puestos.*

Good afternoon. Auh... my name is Maria Parra, I'm part of *Padres Unidos* of Southgate. When we started this task of constructing schools, seventeen (17) years ago. They have the headphones on.

Ed Paek: Yeah, he's the one that's talking. [LAUGHS] He's the translator.

María Parra: *Para la gente que habla inglés.*
For the people that speak English.
¿No tienen más equipo de traducción?
Do you have more translation equipment?

Interpreter: *Yo le traduzco.*

I will translate for you.

María Parra: *Okay, ah, cuando nosotros trabajamos en esto, se estableció como una escuela para ayudar a los estudiantes de esta área.*

Interpreter: When we started to work in this school was established to help the student's ah- in this area.

María Parra: *Denle los equipos para que le puedan traducir. Una de las cosas más importantes que nosotros sabemos que estas juntas son para que se tomen consideración las necesidades que como que comunidades tenemos.*

Give him the equipment so he can translate. We know that these meetings are important because so that they can take into consideration the needs as a community we have.

Interpreter: These meetings are for our needs to be considered as a community, the most important thing.

María Parra: *Hemos hablado, sobre la... el problema del tráfico, como diez (10) juntas.*

Interpreter: We have talked about the traffic problem like in about (10) meetings already.

María Parra: *Esta es la tercera junta que tenemos en esta escuela.*

Interpreter: This is the third (3rd) meeting that we have in this school.

María Parra: *Nos hemos visto en las juntas de los Padres Unidos.*

Interpreter: We have seen ourselves in...

[VOICES OVERLAP]

María Parra: *Tuvimos una junta en el departamento en... de la ciudad de City Hall de Southgate.*

Interpreter: We had a meeting at City Hall... place.

María Parra: *Y todas las veces hemos hablado de... mejorar la... el tráfico en esta área.*

Interpreter: Every time we have talked about improving the traffic in this area.

María Parra: *Yo no entiendo cómo hasta punto no hemos llegado a ningún a conclusión.*

Interpreter: I don't understand why at this point we didn't get to a conclusion.

María Parra: *Les hemos dado muchas ideas de cómo mejorarlo.*

Interpreter: We have given you many ideas how to improve it.

María Parra: *Pero, seguimos en la misma conclusión. No hay nada.*

Interpreter: We're still with the same conclusion, there is nothing.

María Parra: *Siempre que hacemos una pregunta, usted siempre nada más dice "gracias, muy buena pregunta, pero no hay resultado."*

Interpreter: Every time they ask a question you say "good question, thank you" but there are no results.

María Parra: *Necesitamos resultados.*

Interpreter: We need results.

María Para: *Necesitamos saber si alguien que tiene que tomar la decisión venga hacerse cargo de la junta.*

Interpreter: We need somebody to have to make decision to come here to take action of this meeting.

María Parra: *Escuchar las preocupaciones de cada uno de los miembros de la comunidad.*

Interpreter: Listen to the worries of the... every one of the community.

María Para: *Porque, nosotros como empleados del Distrito, hoy estamos en esta escuela, mañana vamos a estar en otra. Pero la escuela es de la comunidad.*

Interpreter: Because we a as employees of the District, today we are going to be in this school, tomorrow at another school and the school is the communities.

María Parra: *Y por eso es tan importante que estas juntas, la comunidad hable, y también sea escuchada y le pongan atención a, a, acatar lo que ellos están diciendo.*

Interpreter: And, it's important for these meetings, that the community speaks and, they are listened to and whatever they say, it takes place

María Parra *Una de las cosas más importantes que el Distrito, el Estado ha trabajado es la seguridad de los estudiantes.*

Interpreter: One of the most important things that the District has worked on and the State [CLEARS THROAT] is the student's security.

María Parra: *Y esto, seguridad para los niños, la primera cosa, la más importante. Y el tráfico, tiene mucho que ver con la seguridad de los niños.*

Interpreter: Security for the kids is one of the most important things and traffic is very related to the kid's security.

María Parra: *Cuando nosotros platicamos la última vez sobre Legacy Lane.*

Interpreter: When we talked about Legacy Lane the last time.

María Parra: *Nosotros les sugerimos por que no abrir una puerta.*

Interpreter: We suggested, why don't you open a door.

María Parra: *De la escuela. Para que los padres que vienen por Tweedy en vez de hace la vuelta en la glorieta.*

Interpreter: A door at the school so the parents that come from Tweedy instead of going around at the round [ASIDE: Roundabout.] the runabout, aha.

María Parra: *Vayan por Legacy Lane y salgan en la famosa Chakemco.*

Interpreter: They go through Legacy Lane and they go by the famous Chakemco.

María Parra: *Es sería una opción.*

Interpreter: That would be an option.

María Parra: *Otra, otra sería, la... el negocio que esta sobre Tweedy y la casa que esta enseguida.*

I

Interpreter: Another one would be, the business that is at Tweedy and the house right away.

María Parra: Tienen espacio, donde el Distrito puede comprar para abrir la calle.

[VOICES OVERLAP]

Interpreter: They have space...

[VOICES OVERLAP]

María Parra: Y hacer otra línea de tráfico.

Interpreter: They have space where the District auh- could buy make space and have another traffic lane.

María Parra: Necesitamos que buscar opciones.

Interpreter: We have to look for options.

María Parra: Hemos hablado mucho sobre el mismo tema y o llegamos a ninguna conclusión.

Interprete: Because we talk about the same thing and we don't get to a conclusion.

María Parra: Muchas gracias por su tiempo,

Interpreter: Thank you much for your time.

[APPLAUSE]

Ed Paek: So, so we take traffic very seriously and we have heard your concerns with some of the options that earlier were discussed and as I mentioned last the last meeting. We had our traffic engineer look at the various options in terms of where we were providing a second [U/I] in terms of the site being another lane. AT the end of the day, this solution was considered the best solution. In terms of how to bring traffic in and out. Using big cul-de-sac with lanes on each side. Any other option, still presents issues in regards to getting traffic after onto Atlantic via Chakemco or Woody. So, the solutions you provide were [U/I] but ultimately we [U/I] that the best solution we're presenting to you tonight. Which is having the cul-de-sac because, even the other solutions you

presented, still have the issue of traffic getting back out to Atlantic, either via Chakemco or through Tweedy and by having other lanes... I think one of the other... options you mentioned was ring adding another lane here and letting cars come all the way out. But that would still have everyone coming out to Chakemco –Tweedy. It didn't necessarily solve the problem and it's not that we take your comments in disregard, we do look at them and do have traffic engineers look at them. And at the end of the day, the determination was made with our experts that study traffic, that, in front of the school have a large cul-de-sac roundabout was the best solution. And so, we do, [U/I] have your concerns and bring in this new facility and ahm... with understandings making sure that it is safe for students.

Tom:

Ah- I'm going to try to answer part of that. My name is Tom Reuben and I'm here because I'm the consultant to the Bond oversight Committee which tries to make sure that the tax dollars that you all voted for and pay are wisely spent. In another life, I'm a transportation Consultant. Now, let me give you a little bit of history. Ah- the district built a hundred thirty-one (131) new schools. Over the past twenty (20) years. The District had to find places to put those new schools and believe it or not, the Los Angeles- Greater Los Angeles urbanized area is the dense in the US. It's over a third more dense than greater New York City in terms of people per capita, there's no space here. The District had one of hell of time trying to find plots. And everything we found was a ground field or we had to take out housing or something of that event- that type. So, there was school needed in this area, the District searched high and long what they found was this site, where we are it has several good things, its good size. It was able to be cleaned up or environmental., has a lot advantages and has one huge disadvantage... transportation access. So, that's how that decision was made. Bouncing the good and the bad, that's the transportation, it still exists today. And at the end of the process, of what the school District can do. The School District has a lot of control with what it can do, in the boundaries of the school. It has responsibilities working with the other local governments, particularly the city. To coordinate to make sure that putting the school in doesn't make things worse, that much worse. But beyond that, the District is very limited in what it can do to with the city and the traffic aspect once you get very behind the orders of the school are really up to the city. Okay, now what do you do? There is some hope. A couple of things, ah- the State Legislature increased the motor fuel tax by twelve (12) cents for gasoline and twenty (20) cents a gallon for diesel. This is going to raise over five (5) billion dollars' year and a lot of that is going to go back to the cities. Los Angeles County Transportation Administration has two and quarter percent sales tax on the largest county in the US and gains of about three and half billion dollars a year including a new one that they

just got last fall. And a part of that money, a good part of that money goes back to cities [U/I] that fund are available on a priority basis throughout the county. So, there's only so much you can do about transportation with the School District. You should talk to them. The school district is happy to talk to them Bu the school district cannot force anybody to do anything. Also, the things that you will hear "Is, yes, that sounds like a good solution." But you need to look at the big picture. And this city is very constrained they have—in their money. They have their built-in environments in streets. You're trying to add capacity to an existing street. Very, very difficult, particularly, when you consider in this area in particular where we have lot of small cities, and the streets go from city to city and you need to coordinate. Try to get traffic signals coordinated between cities. Believe me, very difficult to do. But, there is money out there. There will be new big dollars coming in, in the near future. Talked to the city, talk to MTA, tell them is a real need and you want see something done. And you want to see this goes up to priority line. Get together, talk to people, sign petitions, contact, contact to your elected officials. Let them know what the need is. Talk here because it's important and this is an audience that you should be placing your problems before. But, there's only so much that the School District can do. Talk to the city, talk to MTA, talk to the county, talk all the cities in this area and let them know you got problems. Thank you.

[APPLAUSE]

Fortunato Tapia: Thank you Tom. And, and we're approaching eight (8) p.m. and we are going to take the last four (4) and we have, one here and the lady. We'll take the last for questions and we have a slide where we can take comments. I know, it's the last slide, where we can... does anyone have not asked a question yet? We'll give them preference for the sequence of [U/I] questions. So, you haven't asked a question yet?

Leilani: Hi, my name is Leilani and ahm... I have a concern. Since you guys said you were going to make another sidewalk, how is that going to work out if it's already small and stuffed itself? Like, have you guys spoke to the businesses that you guys wanna make a sidewalk?

Issam Dahdul: We have. We already have an agreement with the businesses, that we're going to take their property, to build a sidewalk. So, the street itself will stay the same size the sidewalk will be built where their property is now.

Leilani: Oh. Okay, and I have more, well, it's like a comment. Ahm... it's to Dr.

Jauregui. Ahm... we are going to graduate by the time that your school is being built and, congratulations when it does. But, we are told to get involved more into our city and stuff so, I don't feel like, I feel like we're getting shut down for you telling us we shouldn't really worry about it. But, I think we are all here for a reason and because we wanna be concerned. And, we wanna help the future students who will be in Legacy High School. So, I feel like, by you saying we shouldn't worry about it. I think we should because we're thinking about siblings that are going to be here to your school probably. And that's how I feel, we should, we shouldn't feel like down by saying we're going [ASIDE: Stop?] right, that we shouldn't worry about, about it. Like, the problem will continue to be ours.

Dr. Jauregui: So, thank you, I didn't mean that. I appreciate...

Leilani: Mhm.

Dr. Jauregui: ...I was just saying to answer to the question of [U/I] for my Middle School.

So, I'm sorry for, but I don't want you to shut down. On the contrary I appreciate your advocacy and I want you to continue that. Ahm, ahm... my response to the, I'm not sure if it's going to affect you right now was that, that I was going to give my schedule for next year. Which may be different in two (2) years from now.

Leilani: Yeah.

Dr. Jauregui: When it impacts us, I here right? Because that schedule is next year and I don't know what's going to happen in three (3) years as far as the schedule. I don't know the schedule three (3) years from now, but, ahm... I don't want you to think that I am shutting you down. I really do appreciate that you have worked so hard because with the whole class project and, and that you're doing this advocacy. I, I really appreciate that. I want my students to do that. So, no, don't feel that way at all. You need to do that as future adults. Because that's very important. Thank you for coming and I'm, sorry that, that's how you felt I meant, I didn't mean that way at all. I appreciate it. Thank you, Thank you.

Fortunato Tapia: And then, you have a question too?

Unknown male: Good evening. I'm a resident of Southgate since 1974, moved away to pursue my education and moved back in 2012. Ahm... I'm also a

Commissioner for health and Education in the Southeast Region with [U/I] Solutions of these dynamics. Very much concerned knowing that Southgate has [U/I] funds of the permit, tows of the Regions probably less than two (2) miles from our, prior established ah- choice if preference currently. Ah- looking at that, I don't know how the liaison is involved with that. Just the Air Quality is of concern simply cause the prior Elementary School that was on Ryle relocated to the park. Critical development of our youth since our well [U/I] and wellness how is that involved in decision of this [AISE: Sure.] choice?

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Issam Dahdul: Good question. I'm, [U/I] simple answer which is any time we build school facilities is, we have to go the Department of Toxicology and Substance Control acronym is DTSC. For approval before we can decide any school facilities students. Ahm.. on the campus, the original High School that is sitting on now, had gone through that and has gone through that extensive clean-up was approved by the Department of Toxics Control for the use of a school t, at the same the International Learning Center Middle School portion has also been cleared for us to develop it as school site. Thank you.

Unknown teacher: Okay, so I teach a Design class in the High School and ahm... like four (4) of the students here in the Design class. And we would invite you guys to our class because we've actually thought of numerous things, for example, the bike lane ahm... one of the things studying especially with urban Design, we have partnership [U/I] is ahm... adding a lane doesn't necessarily resolve the problem. And especially if y go to places like, Long Beach, you'll see that thy have [U/I] with the green, how do you call those? The green concrete [BACKGROUND: (U/I).] yeah...

Issam Dahdul: [U/I].

Unknown teacher: Yeah, and in the back, and in the bike lane. We have had like three (30) students get hit by cars.

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Issam Dahdul: Oh, boy.

Unknown teacher: And this is something that is serious issue, I don't think that, I mean we're, we're a Legacy community and [U/I] can get very emotional and I appreciate that bout ourselves you know. An ahm... as advocates we definitely wanna bring solutions. And so, we invite you guys to our Design class and we'll show you some of the ideas that we came up with, our traffic counts ahm... because they have also studied the major intersection and the left-hand turn lane, that backs up. So, we come with CTL solutions and we would love to have you guys come.

Ed Paek: We would love to attend.

Unknown teacher: Okay.

Fortunato Tapia: And our second to last question, comes from Ein [ph].

[APPLAUSE]

Unknown female: Hello I'm a parent here at Valpa. I'm sorry and I know traffic as everybody's concern is but come on, we live in Los Angeles and traffic is [U/I] so, you can drive the freeway at three (3) o'clock in the morning and it's backed up. So, that is something that unfortunately we have to live here in California. [U/I] is a mess less all over the palace demolished, you know, now, when I go to downtown, it's beautiful. Well, you know that is how a city is [U/I] you go to any cities in New York ah, Chicago, Florida their cities are beautiful thanks for that. So, we're not used to ahm... we're comported where we are. We need to becomes to like... to different stuff or changing or [U/I] is where we're living they don't like that. Once we are into the grove and ruling of [U/I] then we're going to that there is Middle School next door. Only to the new parents that are [U/I] of kids that are going to have a High School and Middle School how great it is going to be to have just one (1) drop-off instead of running off to two (2) different schools. But definitely I think that there has to be another drop-off for the kids to come in from back as soon as possible to consider because no one High School I think in the Unified that has one (1) entrance, that definitely has to be worked out. Ahm... another thing I see, also is here other schools that came from Hollywood, I came from Fairfax there were some you know, left turns where Police were enforced and giving tickets. There was a lot of parents on the drop-off opening doors so that the kids can just come off and the cars are rolling that's something that the school can have parents volunteer and give their time to do that, ah... it's just helping each other out raise their onion and hopefully everything you know, works out for the best. You know, generify, next thing you know, Legacy High International, Valpa makes the news in Southgate, and everybody is going to be proud of their new schools that we have here. But we have to think about the long term. What's, gonna future... ahm... Southgate what's going to be the best. But definitely traffic is, is a concern so that is something we have to look for all kids in there is make sure it works together. Thank you, good night.

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Ed Paek: Thank you.

Fortunato Tapia: Thank you for that, and now we'll adjourn with a final. Thank you for being so patient. I asked you ate the being if ahm... we [BACKGROUND: (U/I).]
Right and [BACKGROUND: (U/I).] and, and you have a microphone.

Dr. Alina Harquin Nelson: Do you hear me better like this, or better with the microphone.

Unknown male: Use the microphone. We are being recorded.

Dr. Alina Harquin Nelson: I am fine like this?

Ed Paek: Whatever... just, just go ahead.

Dr. Alina Harquin Nelson: Well, I just...

Ed Paek: Your choice.

Fortunato Tapia: I can hold it for you if you'd like?

Dr. Alina Harquin Nelson: No, it's alright and my ear is not working very well. So, I hear an echo when I talk to you like this. My name is Dr. Nelson, Dr. Alina Harquin Nelson. I've lived in this community for forty-seven (47) years in the same house. We've talked about the traffic, well before I say that. I whole hardly agree that the future is of those who prepare for it today. And when I see young people like this that want to defend the idea. When I see, a community coming together to build this school. I am thrilled. Okay, we're gonna have, when I see somebody saying that when ah-we're gonna be disturbed with is and that and then we'll come together, it is what it is. We're gonna have noise. We're gonna have it [U/I]. But, what I wanted to talk about having seen mentioned and actually some of the audience was lost that interested in this subject and that I thought was something to be discussed but it wasn't. The agenda was not published., so I really didn't know what to expect today. I wanted to talk about the community. Talk about the traffic we talked about the lights, we talked about the noise. We talked about the report and I am very glad to find out that there were two (2) main concerns. Which is where, there noise which is secondary as that is part of built it comes with it. It is what is. But, the other thing was the vibrations. The vibrations that cost structural damage to residents of the vicinity. Structural damage to the houses, the floors to the fences. So, my question is, I realized this is not

the forum and we wanted it recorded and maybe you can give me that information now. What is the appropriate avenue to follow when you need, what are the resources that I have as, as home owner for my house ah- having been damaged for this construction? I don't know if you have that information now? There were four (4) people who left that have had problems with their house and there is a couple still here mainly that I know, that re my neighbors. I don't know if there are any more. But, ah- I for number one, where do I go? Do I go to the City of Southgate, the Board of Education, the C... I forget the name? My mind is not what it used to be, ah, please help me. Because, I've had damage. If it was brick here and there, I would say "It is what is." And go to the dust, it goes with the workers, working at six-thirty (6:30) in the morning. I don't know if they have special permission. But the last time I checked, it was only, they had to start working at seven (7:00) a.m. Not six-thirty (6:30), not six forty-five (6:45), not six fifty-nine (6:59). And if they come before and start rolling their things and not start drilling. To me it's the same as if they were working. If the noise starts at six-thirty (6:30) on Saturday before Easter, it's not correct. I can even dismiss that. But, my, my house cracked, I need help with that. Please point me to the right direction, me and the rest of us...

[APPLAUSE]

Dr. Alina Harquin
Nelson:

...and thank you.

Fortunato Tapia:

Thank you. Issam.

Issam Dahdul:

So, you're talking of the original construction of the High School which was built in 2009? Is that correct?

Dr. Alina Harquin
Nelson:

I'm, talking about what just happened.

Issam Dahdul:

You're saying if, you're talking about...

Dr. Alina Harquin
Nelson:

[U/I].

Issam Dahdul:

...this school?

Dr. Alina Harquin
Nelson:

My house has been damaged. I live...

Issam Dahdul: As part of the... so, so my question is, so my question is which construction are you referring? Are you referring to the construction when we built this? Are you referring to the road that's down the street, that's across the street?

Dr. Alina Harquin Nelson: ...I'm talking, remember I asked at the beginning what is that brown area? And you said that brown area was going to be landscape.

Issam Dahdul: Correct.

Dr. Alina Harquin Nelson: They're digging, and they're pounding, and they're fixing that for something. Probably landscaping.

Issam Dahdul: Mhm... probably we're building road, now. I'm assuming your talking about the road and concerns about...

[VOICES OVERLAP]

Dr. Alina Harquin Nelson: No.

Issam Dahdul: It's okay.

Dr. Alina Harquin Nelson: If it is the road. But hey re pounding and the house is cracked and the tiles are cracked.

Issam Dahdul: Okay, so you have any concerns that I can put you in touch with the construction, manager from that project and we can start from there.

Dr. Alina Harquin Nelson: I don't wanna start from there. I, I need to know...

[VOICES OVERLAP]

Issam Dahdul: I [U/I]

Dr. Alina Harquin Nelson: I wanna file a complaint.

Issam Dahdul: Construction manager so I don't have that formation, so that is something... ..

[VOICES OVERLAP]

Dr. Alina Harquin Nelson: Where are you the liaison?

[VOICES OVERLAP]

Issam Dahdul: [U/I].

Fortunato Tapia: Yes. [U/I] Relations, so you know, be in contact with me and we can do in contact with the construction colleague of ours, that would be the most appropriate party of ours [U/I] district to be in touch with, okay?

Dr. Alina Harquin Nelson: Personally, I cannot be going like this or like that.

Issam Dahdul: Start with Fort.

Fortunato Tapia: You can start with me.

Dr. Alina Harquin Nelson: I don't wanna fight. I just want my house fixed.

Fortunato Tapia: We appreciate your amicable spirit.

Dr. Alina Harquin Nelson: The ceiling cracked and it's not mildew.

Fortunato Tapia: So, we'll be in contact.

Dr. Alina Harquin Nelson: All right.

Fortunato Tapia: And I'll happily walk you over the bridge to our that you'll need to talk to in terms of the construction site. Okay.

Issam Dahdul: Thank you.

Fortunato Tapia: All right, but thank you appreciate.

Issam Dahdul: Thank you everyone.

Fortunato Tapia: So, thank you everyone for joining us this evening, make sure you are signed in and we'll definitely keep you engaged as we move forward with this proposed project for your community. Thank you so much to you all and have a great evening.

[END OF MEETING]

Letter No. C1: Public Meeting

Public Meeting
Legacy High School Complex Multi-Purpose Room
5225 Tweedy Boulevard
South Gate, California
April 27, 2017

Response C1-1

The commenter states a general opposition to the Project with respect to increased traffic. As described in the Draft EIR Section 3.6 Traffic, the Project would result in a significant and unavoidable traffic impact at the intersection of Atlantic Avenue and Chakemco Street.

Response C1-2

LAUSD has specific requirements for PA address systems in its School Design Guide. The PA address system at ISLC will meet the specific requirements for middle schools as provide in the School Design Guide. Regarding the use of Adella Street as an access point to the Project site, Adella Street will be available for pedestrian access via Legacy Lane. Legacy Lane will be improved with a connection to Adella Street to allow safe pedestrian access. The plans for the construction of Legacy Lane have been approved by the City. Vehicular access via Adella Avenue is restricted by the City of South Gate.

Response C1-3

The scope of the traffic analysis was based on a scoping document prepared in coordination with the City. Details of the traffic counts are provided in Appendix 3.5-1.

Response C1-4

Legacy Lane will be a public roadway that will provide access to ISLC and LHSC. The plans for the construction of Legacy Lane have been approved by the City.

Response C1-5

Traffic counts were conducted November 2015. Traffic count data is provided in DEIR Appendix 3.5-1.

Response C1-6

Per the construction plans approved by the City, Legacy Lane will be implemented as a Class III bikeway. As described in the Draft EIR Section 3.6 Traffic, the Project would result in a significant and unavoidable traffic impact at the intersection of Atlantic Avenue and Chakemco Street.

Response C1-7

Per the construction plans approved by the City, Legacy Lane will be implemented as a Class III bikeway.

Response C1-8

As described in the Draft EIR Section 3.6 Traffic, the Project would result in a significant and unavoidable traffic impact at the intersection of Atlantic Avenue and Chakemco Street. Implementation of Mitigation Measure MM-TRA-1 would reduce the cumulative traffic impact to less than significant. However, the identified cumulative impact would remain significant unless the signalization of the Atlantic Avenue/Chakemco Street intersection, identified in Mitigation Measure MM-TRA-1, occurs prior to the opening of the proposed school. Since LAUSD cannot ensure that the signalization plan improvements would be completed prior to the school's opening, the Project's traffic impacts on the Atlantic Boulevard and Chakemco Street intersection could result in a significant and unavoidable cumulative traffic impact. Therefore, the LAUSD Board of Education will need to adopt a Statement of Overriding Consideration when considering certification of the EIR and approval of the Project. Negotiation of the terms of the MOU with the City to implement the signalization program will occur outside of the CEQA process. Trucks would be expected to use Chakemco to avoid school traffic on Tweedy.

Response C1-9

As described in the Draft EIR Section 3.6 Traffic, the Project would result in a significant and unavoidable traffic impact at the intersection of Atlantic Avenue and Chakemco Street. Implementation of Mitigation Measure MM-TRA-1 would reduce the cumulative traffic impact to less than significant. However, the identified cumulative impact would remain significant unless the signalization of the Atlantic Avenue/Chakemco Street intersection, identified in Mitigation Measure MM-TRA-1, occurs prior to the opening of the proposed school. Since LAUSD cannot ensure that the signalization plan improvements would be completed prior to the school's opening, the Project's traffic impacts on the Atlantic Boulevard and Chakemco Street intersection could result in a significant and unavoidable cumulative traffic impact. Therefore, the LAUSD Board of Education will need to adopt a Statement of Overriding Consideration when considering certification of the EIR and approval of the Project. Negotiation of the terms of the MOU with the City to implement the signalization program will occur outside of the CEQA process. Trucks would be expected to use Chakemco to avoid school traffic on Tweedy.

Response C1-10

The k-rail at the end of Adella Street is maintained by the City. LAUSD has no plans or authority to remove the k-rail. With regard to the athletic field lighting, lighting for the athletic fields was evaluated in the Initial Study (See Appendix 1.0). As stated in the Initial Study, the proposed Project would increase the nighttime illumination of the Project site from current levels. Lighting associated with the proposed Project would include interior lights, courtyard lighting, campus marquees, architectural and/or thematic accent lights to highlight building elements, soft accent lighting for landscaping where appropriate, exterior security lighting, wall- or pole-mounted light fixtures, and field lighting. All new outdoor

lighting being added as part of the proposed Project would be subject to SC-AE-6 through SC-AE-8 included in the Program EIR and listed below.

- SC-AE-6: During and after installation of lights, the Project shall comply with the School Design Guide, which outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.
- SC-AE-7: LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.
- SC-AE-8: Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.

International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:

- Limit the amount of light that can be used
- Minimize glare by controlling the amount of light that tends to create glare
- Minimize sky glow by controlling the amount of uplight
- Minimize the amount of off-site impacts or light trespass

All lighting of outdoor areas will be directed onto the Project site, including on walkways, parking areas, play areas (including basketball and volleyball courts), and away from adjacent properties and public right of way to avoid any light impacts from lighting fixtures included in the proposed Project. Furthermore, the new street trees and hedges that would line the perimeter of the site would also minimize light spillover. Implementation of these SCs would ensure impacts related to light and glare remain less than significant. The following SC are provided in the DEIR Project Description (See page 2.0-23)

SC-AE-6 Light and glare Nighttime illumination Lighting installation During and after installation of lights, the Project shall comply with the School Design Guide, which outlines requirements for lighting and measures to minimize glare for pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.

SC-AE-7 Light and glare Nighttime illumination During Project design LAUSD shall reduce the lighting intensity from the new sources on adjacent residences to no more than two foot-candles, measured at the residential property line. LAUSD shall utilize hoods, filtering louvers, glare shields, and/or landscaping as necessary to achieve the standard. The lamp enclosures and poles shall also be painted to reduce reflection. Following installation of lights the lighting contractor shall review and adjust lights to ensure the standard is met.

SC-AE-8: Light and glare Nighttime illumination During Project design Design site lighting and select lighting styles and technologies to have minimal impact off-site and minimal contribution to sky glow. Minimize outdoor lighting of architectural and landscape features and design interior lighting to minimize trespass outside from the interior.

International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZ0-4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:

- Limit the amount of light that can be used
- Minimize glare by controlling the amount of light that tends to create glare
- Minimize sky glow by controlling the amount of uplight
- Minimize the amount of off-site impacts or light trespass

Response C1-11

See Response C1-10 for lighting impacts. With regard to pedestrian safety, in addition to the sidewalks on Tweedy Boulevard, the District will install fencing in the Tweedy Boulevard median. This will ensure students will not be able to cross the street through traffic. Students will instead be required to walk around, using the sidewalks, to the vacated portion of Tweedy Boulevard to cross to the street.

Response C1-12

The comments relate to general traffic movement in the area of the school. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-13

The comment relates to use of the athletic fields. The athletic fields are not part of the proposed Project. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-14

The commenter expresses a concern about paving of Wood Road. Paving of Wood Road is not part of the proposed Project. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

The commenter expresses a general concern about school timing. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-15

As described in the Draft EIR Section 3.6 Traffic, the Project would result in a significant and unavoidable traffic impact at the intersection of Atlantic Avenue and Chakemco Street. Implementation of Mitigation Measure MM-TRA-1 would reduce the cumulative traffic impact to less than significant. However, the identified cumulative impact would remain significant unless the signalization of the Atlantic Avenue/Chakemco Street intersection, identified in Mitigation Measure MM-TRA-1, occurs prior to the opening of the proposed school. Since LAUSD cannot ensure that the signalization plan improvements would be completed prior to the school's opening, the Project's traffic impacts on the Atlantic Boulevard and Chakemco Street intersection could result in a significant and unavoidable cumulative traffic impact. Therefore, the LAUSD Board of Education will need to adopt a Statement of Overriding Consideration when considering certification of the EIR and approval of the Project. Negotiation of the terms of the MOU with the City to implement the signalization program will occur outside of the CEQA process.

Response C1-16

The comments are a set of general concerns related to traffic and schools. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-17

The comments are a set of general concerns related to process and traffic. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-18

Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. With regard to public safety impacts to the City of South Gate, all students attend south gate school and therefore there would be no net negative impact to public safety due to the new school. Relieving overcrowding and South Gate Middle School could reduce impacts to public safety, particularly given the removal of portable buildings.

Response C1-19

Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. With regard to public safety impacts to the City of South Gate, all students attend south gate school and therefore there would be no net negative impact to public safety due to the new school. Relieving overcrowding and South Gate Middle School could reduce impacts to public safety, particularly given the removal of portable buildings.

Response C1-20

Tweedy Boulevard will be improved with sidewalks to provide safe pedestrian access. Additionally, Legacy Lane will be improved to provide a connection to Adella Avenue on the south, allowing safe pedestrian access. LAUSD's position based on facts provided in the record is Chakemco is unsafe for pedestrian access. LAUSD will not recommend Chakemco Street as a pedestrian route on the Safe Routes to School map that will be prepared in conjunction with the City. The remainder of the comments are a general set of concerns regarding traffic. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision

makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-22

New sidewalks will be constructed on Tweedy Boulevard to provide safe pedestrian access. In addition, Legacy Lane will have 10 foot sidewalks to accommodate students walking to and from the school.

Response C1-23

Impacts associated with air quality are evaluated in Section 3.1 Air Quality of the DEIR. As discussed in the EIR (see page 3.1-22), construction of the proposed Project would not produce a local violation of air quality standards or contribute substantially to an existing or projected air quality violation. Impacts would be less than significant. The long-term operation of the proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality. Impacts would be less than significant.

Response C1-24

The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-25

LAUSD examined potential access points in addition to the primary entrance on Tweedy Boulevard. These included pick-up and drop-off on Legacy Lane, however, this access was determined to be infeasible due to safety concerns (See DEIR Alternatives, Alternative Pick-up and Drop-off, pages 4.0-4 through 4.0-5). Further, this access point would still generally require vehicles to access the site via Tweedy Boulevard. This alternative was deemed infeasible as it would require students to cross Legacy Lane to access the high school, creating an unsafe condition. In addition, once parents drop off students, the driver would have to continue around the school and the future playfields to the turnaround at the end of the street. The driver would then have to go back around the school and make a left onto Tweedy Boulevard or Chakemco Street, exacerbating rather than mitigating traffic congestion and hazards. Additional access points that were also considered include Wood Avenue on the north. However, based on LAUSD's MOU (LAUSD South Region High School #9) with the City, access through the residential neighborhoods is restricted. Additionally, vehicular access from the south via Adella Avenue is restricted. For these reasons, LAUSD has determined additional access points for the school site are not feasible at this time.

Response C1-26

The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

Response C1-27

Noise impacts of the proposed Project are addressed in Section 3.4 Noise of the DEIR. As discussed in section 3.4 (page 3.4-23) temporary noise barriers, such as those required in Mitigation Measure **MM-NOI-4**, at least 10 feet in height and with a transmission loss value of at least 25 dBA (e.g., 1" plywood with acoustical blankets or aluminum sheets with a thickness of at least 0.125 inches) would be capable of attenuating on-site construction noises by 15 dBA over the course of Project buildout. These barriers, in conjunction with appropriate mufflers for construction equipment, would reduce construction-related noise increases at Aldrich Road Residences and Legacy High School to 3.3 dBA and 2.1 dBA, respectively.

At Legacy High School, this would limit the long-term noise impacts of most Project construction phases to below LAUSD's 3 dBA noise increase threshold for existing schools. As discussed earlier, demolition activities involving hydraulic breakers and mounted impact hammers occurring as near as 15 feet from Legacy High School buildings would still be capable of exceeding LAUSD standards for exterior, and possibly interior, noise levels. It is specifically for this reason that Mitigated Measure **MM-NOI-3** is required.. By eliminating any overlap of scheduled school functions and demolition activities occurring directly outside Legacy High School, any exceedance of LAUSD noise standards would occur without the presence of school members or staff to be affected. With the incorporation of LAUSD Standard Conditions and Mitigation Measures **MM-NOI-1** through **MM-NOI-4** the Project's construction noise impacts affecting the Legacy High School Complex would be less than significant.

At the Aldrich Road residences, construction-related noise increases would be reduced below commonly accepted CEQA noise thresholds and even thresholds of ready human perceptibility, the Project would still contribute to noise levels in excess of the City's noise standards for residential properties. As codified in the SGMC and further explained in the City's Noise Element, nuisance noises cannot exceed the standards shown in **Table 3.4-6** and **Table 3.4-7**. The Project's construction noise impact inclusive of the existing ambient noise level would be 54.1 dBA which would exceed the 50 dBA threshold. However, it is important to consider that daytime ambient noise levels at Aldrich Road Residences (currently at 50.8 dBA), exceed the City's daytime residential noise standard.

The Project is consistent with LAUSD's exterior noise standard of 67 dBA Leq and would not exceed commonly accepted thresholds of significance for construction noise. Given that the SGMC only permits

temporary exceedances of this noise standard of no more than 30 minutes and that the ambient noise level is already in exceedance of the 50 dBA standard, it would be a technical impossibility for any noise-making activity not to contribute to ambient noise levels in excess of City standards, no matter how mitigated or controlled. Nevertheless, even though the Project's construction noise impacts would not exceed commonly accepted thresholds of significance for construction noise, Project construction would still elevate ambient noise levels further beyond the City's 50 dBA standard for duration of greater than 30 minutes per hour during construction work hours, and would therefore be considered significant and unavoidable.

Further with regard to vibration (see DEIR page 3.4-32) implementation of SC-NOI-7 and Mitigation Measure MM-NOI-5 would ensure that the Project's construction activities do not interfere with the operations of Legacy High School. However, the Project would still exceed the vibration standards set by the FTA and the SGMC at Aldrich Road Residences and the commercial/industrial land uses west of the Project site. As a result, the Project's construction vibration impacts would be significant and unavoidable.

Response C1-28

The comment relates to an existing condition that is not part of the proposed Project. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project. However, because the comment does not raise an environmental issue, no further response is required.

11.0 CORRECTIONS AND ADDITIONS

OVERVIEW

The *California Environmental Quality Act (CEQA) Guidelines* Section 15088.5 requires:

- (a) *A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice of its availability ... "significant new information" requiring recirculation includes, for example, a disclosure showing that:*
 - (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
 - (2) *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
 - (3) *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
 - (4) *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*
- (b) *Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in the adequate EIR.*
- (c) *If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.*
- (d) *Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.*
- (e) *A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.*

New information is "significant" if as a result of the additional information "the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." *Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal.* 864 P.2d 502, 510 (1993) (*Laurel Heights II*). *State CEQA Guidelines* Section 15088.5(a). Recirculation is not mandated when the new information merely clarifies, amplifies, or makes and insignificant modification to an adequate Draft EIR. (*Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 150 P.3d 709 (2007) (quoting *Laurel Heights II*, 864 P.2d at 510); see also *Marin Mun. Water Dist. v. KG Land California Corp.*, 235 Cal.App.3d 1652, 1667 (1991) (citing *Sutter Sensible Planning v. Board of Supervisors* 122 Cal.App.3d 813 (1981)).

In response to public comments received, clarifications to text of the Draft EIR, as well as staff initiated text changes have been made. Additional information has been identified in comments to the Draft EIR and responded to in **Section 10.0, Responses to Comments**, of this Final EIR. These changes made since publication of the Draft EIR do not substantially affect the analysis contained in the Draft EIR, do not result in a substantial increase in the severity of a significant impact identified in the Draft EIR and do not change the conclusions in any way.

All of the public comments to the Draft EIR, as well as these Corrections and Additions to the Draft EIR have been carefully reviewed to determine whether recirculation of the Draft EIR is required. All of the new information in these Corrections and Additions to the Draft EIR and in the comments and in the responses to comments merely clarify or amplify or make insignificant modifications to an adequate Draft EIR. Therefore, the Draft EIR need not be recirculated prior to certification.

CHANGES TO THE DRAFT EIR

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are in underline and deletions are shown in ~~striketrough~~ format.

Table of Contents

Page iii of the DEIR is revised as follows:

3.0-1 List of Related Projects: LADOT <u>City of South Gate</u> Record of Proposed Project

Page 2.0-21 after the section Program EIR for the School Upgrade Program and before the Section Project Overview the text is amended to include the following:

Incorporation by Reference

This EIR incorporates the following documents by reference:

School Upgrade Program EIR, June 2014

South Region High School #9 Recirculated Final EIR, August 2009

Page 2.0-31 of the DEIR SC-T-4 is revised as follows

LAUSD shall require its contractors to submit a construction worksite traffic control plan to the ~~LADOT~~ City of South Gate Department of Public Works for review prior to construction. The plan will 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.

Page 2.0-33 of the DEIR is revised as follows

Water Supply. LAUSD shall require its construction contractor to coordinate with the City of ~~Los Angeles Department of Water and Power (LADWP)~~ South Gate Department of Public Works or other appropriate jurisdiction and department prior to the relocation or upgrade of any water facilities to reduce the potential for disruptions in service. With respect to outdoor systems, in accordance with CHPS Criteria WE1.0: Create Water Use Budget, CHPS requires the landscape and ornamental water-use budget to conform to the California Model Water Efficient Landscape Ordinance.

Page 2.0-33 of the DEIR is revised as follows

Fire Protection. In accordance with the 2016 School Design Guide, LAUSD shall reduce impacts to fire protection services in connection with new construction projects by requiring local fire jurisdictions to review and approve site plans. In this case, LAUSD shall coordinate with the City of South Gate.

Page 2.0-35 of the DEIR is revised as follows:

The design of the storm drain system (i.e., drain inlets and conveyances) must be adequate to prevent localized flooding due to foliage and debris entrapment from increased storm runoff and prevent contamination of any nearby water basins. To accommodate the additional storm water runoff and annual water yield resulting from the construction, storm drain improvements shall provide capacity to carry ~~25-50~~-year peak runoff rates (as required by City of South Gate). As required, an NPDES storm water permit application shall be submitted and the effluent quality criteria shall be specified in the permit, as determined by the Los Angeles RWQCB based on receiving water guidelines and waste load allocations. Monitoring of the outflow from the collection system may be required in the permit to ensure that the requirements and water quality criteria specified by the permit are achieved. The construction contractor shall use reclaimed water during the construction process, specifically for dust control, soil

compaction, and concrete mixing, to the extent feasible.

Page 2.0-35 of the DEIR is revised as follows:

LAUSD shall require its contractors to submit a construction worksite traffic control plan to the ~~LADOT~~ City of South Gate for review prior to construction. The plan will 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 the State of California Department of Transportation (Caltrans), applicable transportation related safety measures shall be implemented during construction.

Page 2.0-37 of the DEIR is revised as follows:

LAUSD or its construction contractor shall coordinate with the City of ~~Los Angeles~~ South Gate Department of Public Works, ~~Bureau of Sanitation, and Bureau of Engineering~~ or other appropriate jurisdictions and departments prior to the relocation or upgrade of any sewer facilities to reduce the potential for disruptions in service.

Page 2.0-31 and 3.5-8 of the DEIR are revised as follows:

SC-T-4 LAUSD shall require its contractors to submit a construction worksite traffic control plan to the ~~LADOT~~ City of South Gate for review prior to construction. The plan will 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.

Page 3.0-4 of the DEIR is revised as follows:

Table 3.0-1 List of Related Projects: ~~LADOT~~ City of South Gate Record of Proposed Projects

Page 3.4-25 of the Draft EIR under the heading School Land Uses is revised as follows:

There are a variety of recurrent activities (e.g., outdoor playing, bells, conversation) that would elevate ambient noise levels at Aldrich Road Residences to differing degrees. Noise associated with the athletic fields was analyzed in the South Region High School #9 and identified as a significant impact. As stated in the SRHS #9 EIR, "Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA Leq at 50 feet. Noise generated by activity in the football and baseball fields would be audible to residences along Wood Avenue and Aldrich Road....athletic activity noise occurring in the athletic areas would increase the ambient noise level above the 3 decibel ambient noise level threshold at residences along Wood Avenue and Aldrich Road. Therefore, this impact would be considered significant and unavoidable." Use of the athletic fields as part of the proposed Project would be expected to result in similar noise levels as those evaluated in the SRHS #9 EIR and would not result in any new significant impacts not previously identified.

12.0 MITIGATION MONITORING AND REPORTING PROGRAM

PURPOSE

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to: (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation measures; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the Project and the methods of monitoring such actions. This MMRP takes the form of a table that identifies the responsible entity for monitoring each mitigation measure and the timing of each measure.

**Table 12.0-1
Mitigation Monitoring and Reporting Program Matrix**

Mitigation Measure	Action Required	Responsible Implementing Party	Monitoring Frequency	Monitoring Responsibility	Timing	Signature of Responsible Party (and compliance date)
MM NOI-1: The construction contractor, or its designee shall ensure all construction areas for staging and warming-up equipment shall be located as far as feasible from noise-sensitive land uses. This condition shall be included as a note on construction plans.	This condition shall be included as a note on construction plans	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to issuance of a grading permit	
MM NOI-2: The construction contractor or its designee shall ensure portable noise sheds for smaller, noisy equipment, such as air compressors, dewatering pumps, and generators are provided as feasible. This condition shall be included as a note on construction plans	This condition shall be included as a note on construction plans	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to issuance of a grading permit	
MM NOI-3: The construction contractor or its designee shall ensure that operation of hydraulic breakers and mounted impact hammers shall be restricted from occurring during Legacy High School's regularly scheduled hours of operation. Furthermore, these pieces of equipment shall not be operated concurrently with any other pieces of heavy machinery in order to prevent elevated cumulative noise impacts. This condition shall be included as a note on construction plans.	This condition shall be included as a note on construction plans	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to the issuance of a grading permit	
MM NOI-4: Prior to issuance of a grading permit, the construction contractor or its designees shall install temporary noise barriers at least 10 feet in height and with a transmission loss value of at least 25 dBA (e.g., 1" plywood with acoustical blankets or aluminum sheets with a thickness of at least 0.125 inches) capable of attenuating on-site construction noises by 15 dBA.	Install temporary noise barriers	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to the issuance of a grading permit	

12.0 Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Responsible Implementing Party	Monitoring Frequency	Monitoring Responsibility	Timing	Signature of Responsible Party (and compliance date)
MM NOI-5: The construction contractor or its designee shall ensure that hoe ram and hydraulic breaker activities shall be conducted outside of Legacy High School hours of operation so as to limit any disruption of learning activities. Similarly, any impact pile driving activities within 250 feet of Legacy High School facilities shall also be conducted outside of regular school hours. This condition shall be included on all construction plans for the project.	This condition shall be included as a note on construction plans	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to the issuance of a grading permit	
MM PED-1: The construction contractor or its designee shall ensure that during construction activities, construction trucks shall not access the site during specific peak student loading/unloading times as specified by LAUSD and the Legacy High School Complex. This requirement shall be included on all construction documents.	This requirement shall be included on all construction documents.	Construction Contractor or Designee	Monitoring required once during establishment of field procedures and then during construction, as necessary, to ensure compliance with the construction plan note.	LAUSD OEHS	Prior to issuance of grading permits	
MM TRA-1 The project applicant shall install a three-way traffic signal in the Atlantic Avenue/Chakemco Street intersection. The signalization would cover the northbound Atlantic Avenue Approach, the Chakemco Street approach, and the Wright Road approach. Southbound Atlantic Avenue would not be controlled by the signal.	LAUSD shall enter into an MOU with the City of South Gate regarding the timing and location of the traffic signal and install the signal as per the MOU conditions.	LAUSD and City of South Gate	Signal will be installed per the MOU conditions.	LAUSD and City of South Gate	Prior to operation of the school	