

APPENDIX 10.0

**South Region High School No. 9
Final Recirculated Environmental Impact Report
Correspondence with the City of South Gate**

Final

Recirculated Environmental Impact Report

**South Region High School No. 9
SCH No. 2008041065**

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August 2009

EXECUTIVE SUMMARY

This Final Environmental Impact Report (FEIR or August 2009 FEIR) provides revisions to the Recirculated Draft EIR (DEIR or May 2009 Recirculated DEIR) for the proposed project, published for a 45-day public review period beginning May 28, 2009. Revisions to the May 2009 Recirculated DEIR are identified in this FEIR as follows:

- ~~strikeout~~ text to indicate deletions
- ***bold, italic, and underline*** text to signify additions

Introduction

The Los Angeles Unified School District (LAUSD or District) proposes to construct a new high school in the City of South Gate (proposed project). All projects within the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the proposed project in accordance with the California Environmental Quality Act (CEQA).¹ The proposed project is intended to relieve school overcrowding consistent with the New School Construction program and the Facilities Master Plan.^{2,3} The proposed project would relieve overcrowding at Bell, Huntington Park, South East, and South Gate High Schools, located in LAUSD's South Region. ~~This ***The May 2009*** Recirculated Draft Environmental Impact Report (Draft EIR or DEIR)~~ includes information and analyses updated since ~~an~~ the DEIR was circulated for this project in December 2008 (SCH No. 2008041065). For purposes of ~~clarity and distinction~~ ***in this August 2009 FEIR***, ~~this ***the***~~ recirculated document ~~will be~~ ***is*** referred to as the ***May 2009*** Recirculated DEIR and the previously circulated DEIR ~~will be~~ ***is*** referred to as ***December 2008*** DEIR ~~2008~~. LAUSD's Facilities Master Plan sets forth long-term goals for school facilities, including providing a neighborhood school seat for every student (kindergarten through grade 12) in the District, and reducing class sizes to agreed upon limits in all grade levels.

Implementation of the proposed project is intended to fulfill the following objectives:

- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Create schools that are centers of community engagement both during and outside of normal operating hours;
- Relieve overcrowding at Bell, Huntington Park, South East, and South Gate High Schools by providing educational facilities for grades nine through twelve

¹ CEQA, Public Resources Code (PRC), §21000 et al., amended 2006.

² LAUSD, *Facilities Master Plan*. December 1, 1997 (updated in June 2000).

³ LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report (PEIR)*, Board Certified June 8, 2004.

- Avoid displacement of existing residences and businesses where feasible;
- Maintain traditional classroom instruction hours for high school students of approximately 8:00 AM to 3:00 PM;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities;
- Maximize the use of District-owned land; and
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources the wise and efficient use of limited land and public resources.

Purpose of the Environmental Impact Report

The primary purpose of CEQA is to inform the public and decision makers as to the potential impacts of a project and to allow an opportunity for public input to ensure informed decision-making. CEQA requires all state and local government agencies to consider the environmental effects of projects over which they have discretionary authority. CEQA also requires each public agency to mitigate or avoid the significant environmental impacts resulting from proposed projects, when feasible, and to identify a range of feasible alternatives to the proposed project that could reduce or avoid those environmental effects. Under CEQA, a project EIR analyzes the impacts of an individual activity or specific project and focuses primarily on changes in the environment that would result from the activity or project. The EIR must include the contents required by CEQA and the *CEQA Guidelines*, and examine all phases of the project, including planning, construction, operation, and any reasonably foreseeable future phases. ~~This~~ The May 2009 Recirculated DEIR includes information and analyses to consider new playfields proposed for development on the south of the campus, which were not considered in the December 2008 DEIR ~~2008~~. The new playfields proposed are not considered “significant new information” as defined in *CEQA Guidelines* Section 15088.5. Even so, LAUSD has decided to recirculate the December 2008 DEIR ~~2008~~ to enable the responsible and trustee agency, and general public, to review and comment on this new information.

Use of the New School Construction Program Environmental Impact Report

The LAUSD has prepared a Program EIR (PEIR), which provides a programmatic level environmental review for the New School Construction Program (Program) in accordance with the requirements of CEQA.⁴ The LAUSD Board of Education (Board) certified the PEIR on June 8, 2004. The Program is expected to deliver approximately 165,000 classroom seats within LAUSD by the end of 2012.⁵ The PEIR provides general analysis and guidance on the Program while project specific analysis is provided with later CEQA documents through a process known as *tiering*.⁶ This EIR document incorporates the PEIR by reference and concentrates on site-specific issues related to the proposed project. The PEIR is available for review at the LAUSD Facilities Services Division website (www.laschools.org/find-a-school). The PEIR also includes standard mitigation measures and related performance standards (Best

⁴ LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report* (PEIR), Board Certified June 8, 2004.

⁵ LAUSD, *Strategic Execution Plan*, January 2008, p. 8.

⁶ Tiering is the process of first addressing general (programmatic) matters in a broad PEIR, followed by more narrowly focused (project-level) environmental documentation that incorporates by reference the more general document.

Management Practices [BMP's]) that the LAUSD will apply to the proposed project as applicable, to confirm that one or more measures or standards will effectively avoid or reduce environmental impacts.⁷

Project Location and Setting

The proposed project site is located a highly urbanized area of the City of South Gate in southeastern Los Angeles County. Adella Avenue borders the site to the west followed by commercial and light industrial uses serviced by Atlantic Boulevard; Tweedy Boulevard intersects the center of the project area; residential development is located to the north, beyond which is Wood Avenue; a strip of commercial, residential, and light industrial development are located to the south, followed by Aldrich Avenue then more residential development; and the Los Angeles River channel borders the site to the east. Interstate 710 (I-710) is also located approximately 1,130 feet east of the proposed project site. The surrounding area is located on generally level terrain with the exception of the Los Angeles River levee adjacent to the east. Union Pacific Railroad (Spur No. 810961T) is located directly to the northeast. In general, urban and suburban residential land uses dominate much of the land area within the City of South Gate. Additionally, commercial and industrial land uses are prevalent along freeway and railway rights-of-way and major urban roadways, such as boulevards and streets. The site has an abandoned appearance and is primarily vacant, with the exception of one warehouse and four modular storage buildings of various dimensions. All remaining structures, included building foundations and asphalt parking areas, would be removed during construction of the proposed project. The site encompasses approximately 34 acres and is roughly square in plan. The topography is relatively level with an elevation of approximately 95 feet above mean sea level.⁸

Project Description

The proposed project would include the addition of approximately 145,000 square feet (s.f.) of educational building space. Three separate classroom facilities would be constructed, accommodating 1,431 students. The classroom facilities would be two stories in height (approximately 34 feet). Additional school facilities include a 10,000 s.f. multipurpose room, a music and drama hall, a gymnasium, and an administration building. The additional facilities would be centrally located and would not exceed two stories in height (approximately 34 feet). Each of the three classroom buildings would provide a lunch shelter; an additional food service facility would be located adjacent to the music and drama hall. A 133-space surface parking lot would be located on the far west portion of the site, **and an additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.** Playfields would be located to the east and south of the main campus. The playfields would provide soccer, football, softball, and baseball activities. Security and nighttime lighting would be provided for the playfields to the east, and would not be provided for the playfields to the south of the school buildings. There would be no nighttime use of the playfields to the south. An eight-foot wall would be constructed on the northern boundary to separate the school facility from the adjacent residential development.

⁷ LAUSD, OEHS. *New School Construction Program, Draft PEIR*, Appendix B.1. March, 2004.

⁸ Geomatrix Consultants, Inc. *Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report for Proposed South Region High School No. 9 and South Region Middle School No. 4*, City of South Gate, California, 2006, p 2.

Proposed Project Impacts

As allowed by CEQA, ~~this~~ the May 2009 Recirculated DEIR focuses only on those environmental impact categories identified by LAUSD as having “potentially significant” impacts during the notice of preparation (NOP), scoping process, and public review period for the Initial Study.⁹ Other environmental concerns were found to have no impact or a less than significant impact and therefore, not discussed in this document. Environmental factors are listed by the level of significance of their impacts below in Table ES-1 as determined in the Initial Study (see Appendix A of ~~the DEIR 2008~~ this August 2009 FEIR).

**TABLE ES-1
SIGNIFICANCE OF ENVIRONMENTAL PARAMETERS ANALYZED IN THE INITIAL STUDY**

No Impact	Less than Significant Impact	Potentially Significant Impact
Agriculture Resources	Biological Resources	Aesthetics
Mineral Resources	Cultural Resources	Air Quality
Population and Housing	Hydrology and Water Quality	Geology and Soils
Recreation and Parks	Land Use and Planning	Hazards/Hazardous Materials
	Utilities and Service Systems	Noise
		Pedestrian Safety
		Public Services
		Transportation/Traffic

Unavoidable Adverse Impacts

As described in Chapter 3 of this EIR, implementation of the proposed project would result an unavoidable and adverse impacts for air quality, noise, pedestrian safety, and traffic and transportation. Specifically, localized construction air emissions would exceed applicable significance thresholds, noise levels from construction and operations would exceed the applicable standards, and vehicle operations would significantly decrease service levels for certain intersections.

Cumulative Impacts

A list of related present and reasonably foreseeable future projects within the vicinity of the proposed project was developed to evaluate cumulative impacts. The cumulative project list provided in Section 2.5, Cumulative Scenario, includes projects that are either reasonably foreseeable or are expected to be constructed or operated during the life of the proposed project. The proposed project would result in significant and unavoidable impacts with respect to air quality, noise, and traffic and transportation. Cumulative impacts associated with the construction and operation of the proposed school are discussed in detail within each issue area section in Chapter 3, *Environmental Analysis*.

⁹ CEQA Guidelines, CCR, Title 14, Chapter 3, Article 5. §15063, 2007.

Growth-Inducing Impacts

The proposed project would not induce more growth, but it would accommodate the population growth that already has occurred and which will continue to occur over time. The infrastructure improvements that would occur on the proposed project site would be used for the sole purpose of serving the proposed project. The proposed project site is located within an urbanized area and is supported by existing utility infrastructure. Implementation of the proposed project would not be growth inducing and would not create the need for additional housing or infrastructure. The intent of the proposed project is to alleviate the overcrowded conditions and redistribute the existing student population within LAUSD Local District 6 (South Region), specifically at Bell, Huntington Park, South East, and South Gate High Schools. Implementation of the proposed project would not directly or indirectly result in substantial population growth in the area. A significant impact to population growth is not anticipated and no mitigation measures are required.

Mitigation Measures

A summary of the impacts, mitigation measures, and significant impacts after mitigation for the proposed project is provided in Table ES-2 at the end of this chapter.

Alternatives to the Proposed Project

As discussed in Chapter 4, the alternatives to the proposed project, with the exception of the mandatory No Project Alternative, were selected due to their potential to achieve basic project objectives and to lessen or avoid significant environmental effects of the proposed project discussed in the EIR. The alternatives considered in the analysis include:

Alternative 1: No Project

Under the No Project, the proposed project would not be constructed. The project site would remain vacant. The new seats necessary to minimize overcrowding in the South Region would not be provided. LAUSD would be required to continue to accommodate the projected increases in student enrollment, and would add portable classrooms to existing schools where feasible. No change in proposed project site conditions or land uses would occur under this alternative. Even though impacts are generally less than the proposed project, this alternative would not attain any of the project objectives provided on page ES-1.

Alternative 2: Reduced Project Alternative

Under the Reduced Project Alternative, a high school would be operated at the same location as the proposed project, but at a reduced scale. This alternative considers the addition of 1,073 two-semester seats as opposed to the 1,431 two-semester seats, which represents a 25 percent reduction in project size. The remaining area on-site would remain undeveloped. The Reduced Project Alternative would include the multipurpose room, music and drama hall, gymnasium, and administration building, but at a smaller

scale as compared to the proposed project. The facilities would not exceed two stories in height (approximately 34 feet). The 133-space surface parking area (proposed project) would be reduced to 100 spaces under this alternative. This alternative would provide athletic fields for soccer and football, but would not provide a diamond field for softball and baseball activities. Even though this alternative would attain a portion of the project objectives provided on pages ES-1, it would not maximize the use of LAUSD owned and vacant land, reducing reliance on portable classrooms as soon as possible and maximizing the use of limited bond funds to provide the needed classroom facilities.

Areas of Controversy

The *CEQA Guidelines* require that an EIR summary identify areas of controversy known to the lead agency, including those issues raised by other agencies and the public. The analysis in this EIR indicates that localized construction air emissions would exceed applicable significance thresholds, noise levels from construction and operations would exceed the applicable standards, pedestrian safety would require additional consideration, and vehicle operations would significantly decrease service levels for certain intersections. As a result, impacts would be significant and unavoidable, even after incorporation of mitigation measures. As a result, issues related to located air quality, noise from construction and operation, pedestrian impacts, and traffic impacts, are potential areas of controversy.

Issues to be Resolved

Section 15123(b)(3) of the *CEQA Guidelines* requires that an EIR present issues to be resolved by the lead agency.¹⁰ These issues include the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the proposed project include decisions by the LAUSD, as the lead agency, as to whether:

- This EIR adequately describes the environmental impacts of the proposed project;
- The recommended mitigation measures should be adopted or modified;
- Additional mitigation measures need to be applied to the proposed project;
- Feasible alternatives exist that would achieve LAUSD's objectives and would reduce potentially significant environmental impacts;
- Significant unavoidable impacts would occur if the project is implemented; and
- The proposed project should or should not be approved.

¹⁰ *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15123(b)(3), amended 2007.

**TABLE ES-2
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9**

Impacts	Mitigation Measures	Significance (after Mitigation if required)
3A Aesthetics		
Impact 3A.1: Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 AM to 3 AM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 AM to 5 AM Pacific Daylight Time (between early April and late October).	No mitigation measures are required.	Less Than Significant
Impact 3A.2: Result in a cumulatively considerable shadow impacts at the project site and immediate area.	No mitigation measures are required.	Less Than Significant
3B Air Quality		
Impact 3B.1: Violate an air quality standard or contribute to an existing or projected air quality violation.	<p>Mitigation Measure AIR-1:</p> <ul style="list-style-type: none"> • General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. • Apply dust suppressants (e.g., polymer emulsion) to actively disturbed areas upon completion of clearing and grading. • Replace ground cover in disturbed areas as quickly as possible. • Water disturbed sites <u>three</u> times daily (locations where grading is to occur will be thoroughly watered prior to earth moving). • All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches. • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • During construction, trucks and vehicles in loading and unloading queues would turn their engines off when not in use to reduce vehicle emissions; all construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site. • Require minimum soil moisture of 12 percent for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe. • Construction emissions will be scheduled to avoid emission peaks and discontinued during second-stage smog alerts. • General contractors shall maintain and operate construction equipment to minimize exhaust emissions; all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. 	Significant and Unavoidable

**TABLE ES-2 (continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9**

Impacts	Mitigation Measures	Significance (after Mitigation if required)
Impact 3B.2: Expose sensitive receptors to substantial pollutant concentrations.	Mitigation Measure AIR-1	Significant and Unavoidable
Impact 3B.3: The project would have a significant impact if it would conflict with the State goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth in the timetable established by AB32, California Global Warming Solutions Act of 2006.	No mitigation measures are required.	Less Than Significant
Impact 3B.4: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).	No mitigation measures are required.	Less Than Significant
3C Geology and Soils		
Impact 3C.1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.	No mitigation measures are required.	Less Than Significant
Impact 3C.2: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.	No mitigation measures are required.	Less Than Significant
Impact 3C.3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	No mitigation measures are required.	Less Than Significant
Impact 3C.4: Result in cumulatively considerable impact with respect to geology and soil impacts.	No mitigation measures are required.	Less Than Significant
3D Hazards and Hazardous Materials		
Impact 3D.1: Be located on a site that is (a) a current of former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood.	No mitigation measures are required.	Less Than Significant
Impact 3D.2: Be located within 1,500 feet of a pipeline that may pose a safety hazard.	No mitigation measures are required.	Less Than Significant
Impact 3D.3: Be located on a site that contains, or is near, propane tanks that can pose a safety hazard.	No mitigation measures are required.	Less Than Significant

TABLE ES-2 (continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9

Impacts	Mitigation Measures	Significance (after Mitigation if required)
Impact 3D.4: Result in a cumulatively considerable hazard or hazardous materials impact.	No mitigation measures are required.	Less Than Significant
3E Noise		
Impact 3E.1: Expose persons to or generation of noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.	<p>Mitigation Measure NOI-1: LAUSD's construction shall not occur within the City of South Gate's noise sensitive hours of 10 PM and 7 AM.</p> <p>Mitigation Measure NOI-2: LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices.</p> <p>Mitigation Measure NOI-3: LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities.</p> <p>Mitigation Measure NOI-4: LAUSD's construction contractor will require all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible.</p>	Significant and Unavoidable
Impact 3E.2: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	No feasible mitigation measures are available.	Significant and Unavoidable
Impact 3E.3: Expose persons to or generate excessive groundborne vibration or groundborne noise levels.	No mitigation measures are required.	Less Than Significant
Impact 3E.4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	Implementation of Mitigation Measures NOI-1 through NOI-4.	Significant and Unavoidable
Impact 3E.5: Result in cumulatively considerable impact with respect to noise.	No feasible mitigation measures are available.	Significant and Unavoidable
3F Pedestrian Safety		
Impact 3F.1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.	<p>Mitigation Measure PED-1: LAUSD shall coordinate with the City of South Gate and UP Railroad to provide warning signs near the railroad crossing areas adjacent to the school.</p> <p>Mitigation Measure PED-2: Six months prior to opening the school, LAUSD's OEHS shall coordinate with the City of South Gate to prepare a "Pedestrian Routes to School" plan. LAUSD's OEHS will distribute the maps to the school upon completion and the maps will then be distributed to students, parents and staff.</p>	Significant and Unavoidable

TABLE ES-2 (continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9

Impacts	Mitigation Measures	Significance (after Mitigation if required)
Impact 3F.2: Create unsafe routes for students walking from local neighborhoods.	<p>Mitigation Measure PED-3: LAUSD shall coordinate with the City of South Gate to approve plans to construct a sidewalk along the north side of Tweedy Boulevard between Atlantic and the school property line.</p> <p>Mitigation Measure PED-4: Four months prior to opening the proposed high school, 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..</p> <p>Mitigation Measure PED-5: Six months prior to opening of the proposed high school, LAUSD's OEHS shall coordinate with the citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual." The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards.</p>	Significant and Unavoidable
Impact 3F.3: Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.	Implementation of PED-5 would reduce impact to less than significant.	Less Than Significant
Impact 3F.4: Result in cumulatively considerable impact with respect to pedestrian safety.	See Mitigation Measures PED-1 through PED-5 above.	Less Than Significant
3G Public Services		
Impact 3G.1: Result in substantial adverse physical impacts resulting in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times or other performance objectives.	No mitigation measures are required	Less Than Significant
Impact 3G.2: Result in a cumulatively considerable impacts to fire protection services.	No mitigation measures are required	Less Than Significant
3H Traffic		
Impact 3H.1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).	<p>Mitigation Measure TRK-1: At the intersection of Atlantic Avenue and Firestone Boulevard, LAUSD shall coordinate with the City of South Gate to implement a northbound dedicated right turn lane. The northbound bus stop at this location shall be moved to the far side of the intersection (the southeast corner stop is a near-side stop).</p> <p>Mitigation Measure TRK-2: LAUSD shall coordinate with the City of South Gate to develop a Neighborhood Traffic Management Plan for the roadway segments of Adella Avenue north of Wood Avenue and Tweedy Boulevard west of the project site boundary LAUSD will contribute funds in an amount not to exceed \$25,000 toward the completion of a</p>	Less Than Significant

TABLE ES-2 (continued)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9

Impacts	Mitigation Measures	Significance (after Mitigation if required)
Impact 3H.2: Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways.	Neighborhood Traffic Management Plan study, including public meetings and the implementation of traffic calming measures, such as speed humps/cushions or more intense improvements, such as turn restrictions and geometric changes to enforce those restrictions. No mitigation measures are required.	Less Than Significant
Impact 3H.3: Result in inadequate parking capacity.	No mitigation measures are required.	Less Than Significant
Impact 3H.4: Result in a cumulatively considerable impact with respect to traffic.	See Mitigation Measures TRK-1 and TRK-2.	Significant and Unavoidable

CHAPTER 1.0

Introduction

This Final Environmental Impact Report (FEIR or August 2009 FEIR) provides revisions to the Recirculated Draft EIR (DEIR or May 2009 Recirculated DEIR) for the proposed project, published for a 45-day public review period beginning May 28, 2009. Revisions to the May 2009 Recirculated DEIR are identified in this FEIR as follows:

- ~~strikeout~~ text to indicate deletions
- ***bold, italic, and underline*** text to signify additions

1.1 Purpose of the Environmental Impact Report

The Los Angeles Unified School District (LAUSD or District) is proposing to construct a high school referred to as South Region High School (SRHS) No. 9 (proposed project) in the City of South Gate. In accordance with the California Environmental Quality Act (CEQA), projects which have the potential to result in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, must undergo analysis to disclose the potential significant effects.^{1,2}

CEQA was enacted in 1970 by the California Legislature to disclose to decision makers and the public the significant environmental effects of proposed activities and ways to avoid or reduce the environmental effects by requiring implementation of feasible alternatives or mitigation measures.³ CEQA applies to all California governmental agencies at all levels, including local agencies, regional agencies, state agencies, boards, commissions, and special districts (such as LAUSD). LAUSD is the Lead Agency for the proposed project, having the principal responsibility for conducting the CEQA environmental review to analyze the potential environmental effects associated with project implementation.

The CEQA ~~review~~ ***documentation*** included the Initial Study and Notice of Preparation (NOP), circulated for public review between April 11, 2008 and May 12, 2008. LAUSD also facilitated a scoping meeting on April 24, 2008 at the Bryson Elementary School, located at 4470 Missouri Avenue in South Gate, California. The Initial Study determined that an ~~Environmental Impact Report (EIR)~~ was warranted for determining the effects of the proposed project, to provide feasible alternatives, and mitigation measures. As a result, a DEIR was prepared and circulated to the public and affected agencies in December 2008 for a 45-day review period (SCH No.

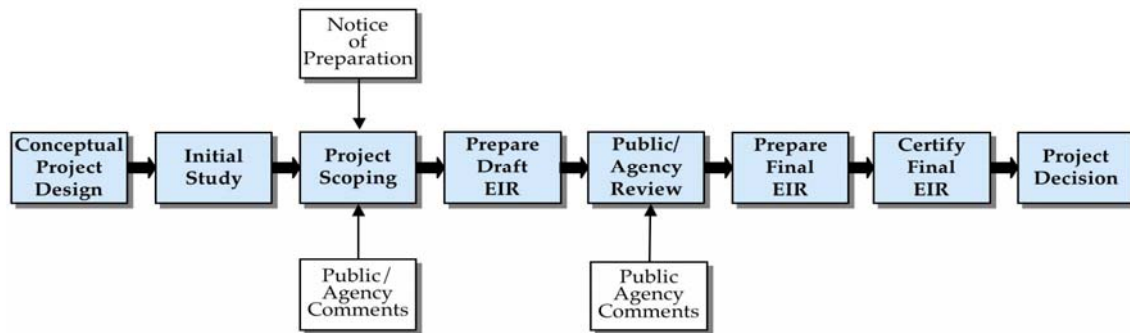
¹ CEQA Statute, Public Resources Code (PRC) Division 13, Chapter 1, §21000 et al., 2005.

² *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Chapter 3, §15378, 2007.

³ CEQA Statute, PRC Division 13, Chapter 1, §21000 et al., 2005.

2008041065), hereinafter referred to as the December 2008 DEIR. A public meeting was held on December 6, 2008 at the Bryson Elementary School to gather input from the local community regarding the findings of the DEIR. ~~Since the circulation of the The December 2008 DEIR DEIR 2008 was recirculated by LAUSD for a 45-day review period, beginning May 28, 2009, to analyze potential environmental impacts resulting from constructing and operating~~ modified their site plan to include new playfields proposed for development to the south of the main campus. This new site component was not considered in the ~~DEIR 2008~~ December 2008 DEIR analysis. ~~This The May 2009 Recirculated DEIR~~ includes analyses for the new playfields. For purposes of clarity and distinction, this document will be referred to as the May 2009 Recirculated DEIR in this August 2009 FEIR. The new playfields proposed are not considered “significant new information” as defined in CEQA Guidelines Section 15088.5. Even so, LAUSD has decided to recirculate the ~~DEIR 2008~~ December 2008 DEIR to include associated CEQA analysis of potential environmental impacts from constructing and operating the south campus playfields for public consideration, in ~~this~~ the May 2009 Recirculated DEIR. LAUSD, as the Lead Agency, is responsible for approving the proposed project. As shown on **Figure 1.1 EIR Process Flowchart**, one of the primary objectives of CEQA is to enhance participation by the reviewing agencies and public in the planning process.⁴ Community members are encouraged to participate in the environmental review process, to request information regarding meetings and release of documents, to monitor newspapers for formal announcements, and to submit comments at every possible opportunity.

**FIGURE 1-1
EIR PROCESS FLOWCHART**



1.2 Use of the New School Construction Program Environmental Impact Report

In response to state and local legislation, and the need to provide additional school facilities throughout LAUSD, the Los Angeles Board of Education (Board) adopted goals and guidelines that provide a policy framework, which is encompassed in the New School Construction Program (Program). Implementation of the Program is outlined in the LAUSD Facilities Master Plan.⁵ The

⁴ CEQA Guidelines, CCR, Title 14, Chapter 3, §15201, 2007.

⁵ LAUSD, *Facilities Master Plan*. December 1, 1997 (updated in June 2000).

Program is a multi-phased effort to provide additional classroom seats by constructing new schools and/or expanding existing school campuses pursuant to the Facilities Master Plan.

LAUSD has prepared a Program EIR (PEIR), which provides a programmatic level environmental review for the Program in accordance with the requirements of CEQA.⁶ The Board certified the PEIR on June 8, 2004. The Program is expected to deliver approximately 165,000 classroom seats within LAUSD by the end of 2012.⁷ The PEIR provides general analysis and guidance on the Program while project specific analysis is provided with later CEQA documents through a process known as *tiering*.⁸ This document incorporates the PEIR by reference and applies the thresholds of significance recommended in the PEIR to determine the significance of environmental effects. The PEIR also includes standard mitigation measures and related performance standards [Best Management Practices (BMPs)] that LAUSD will apply to the proposed project as applicable, to confirm that one or more measures or standards will effectively avoid or reduce environmental impacts.⁹ The PEIR is available for review at the LAUSD Facilities Services Division website (www.laschools.org/find-a-school).

1.3 Scope of the Environmental Impact Report

This section provides a summary of the issues addressed in this August 2009 FEIR Recirculated DEIR, which are consistent with those analyzed in the December 2008 DEIR-2008. The CEQA documentation was prepared following input from the public, responsible agencies, affected agencies, and other interested parties through the EIR scoping and public review process, which included the following activities:¹⁰

- An Initial Study and NOP were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 30 days (April 11 to May 12, 2008).
- The NOP was posted in the County Clerk's office for 30 days from April 11, 2008 to May 12, 2008 and was submitted to the State Clearinghouse on April 11, 2008 (SCH No. 2008041065) to officially solicit participation in determining the scope of the EIR.
- A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the ~~DEIR-2008~~ December 2008 DEIR. A summary of the comments received during the scoping meeting are provided in Appendix A of the ~~DEIR-2008~~ this August 2008 FEIR.
- A ~~Draft EIR DEIR-2008~~ December 2008 DEIR and Notice of Availability (NOA) were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from December 5, 2008 to January 19, 2009).
- The NOA was posted in the County Clerk's office for 45 days from December 5, 2008 to January 19, 2009 and was submitted to the State Clearinghouse on December 5, 2008 to officially solicit participation in the findings of the December 2008 DEIR.

⁶ LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report (PEIR)*, Board Certified June 8, 2004.

⁷ LAUSD, *Strategic Execution Plan*, January 2008, pg. 8.

⁸ Tiering is the process of first addressing general (programmatic) matters in a broad PEIR, followed by more narrowly focused (project-level) environmental documentation that incorporates by reference the more general document.

⁹ LAUSD, OEHS, *New School Construction Program, Draft PEIR*, Appendix B.1, March, 2004.

¹⁰ *CEQA Guidelines*, CCR, Title 14, Chapter 3, §15063, 2007.

- *A public meeting was held on December 6, 2008 at Bryson Elementary School to gather input from the local community regarding the findings of the December 2008 DEIR.*
- *The May 2009 Recirculated DEIR and NOA were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from May 28, 2009 to July 13, 2009).*
- Information requested and input provided during the 45-day public review period for the *DEIR 2008 May 2009 Recirculated DEIR is incorporated in this FEIR (See Section 8, Response to Comments).*

The content of the *December 2008 DEIR and May 2009 Recirculated DEIR* were established based on the findings in the Initial Study and public and agency input. Under *CEQA Guidelines*, the analysis in this EIR is focused on issues determined in the Initial Study to be potentially significant, whereas issues found in the Initial Study to have less than significant impacts or no impact, do not require further evaluation.¹¹ Therefore, based on the analysis contained in the Initial Study, this EIR analyzes the following environmental issues:

- | | |
|-----------------------------------|------------------------------|
| • Aesthetics | • Noise |
| • Air Quality | • Pedestrian Safety |
| • Geology and Soils | • Public Services |
| • Hazards and Hazardous Materials | • Traffic and Transportation |

Mitigation measures to reduce impacts to a less than significant level have been included in this EIR as required, and shall be implemented as feasible. ~~This~~ *The May 2009 Recirculated DEIR* ~~is being~~ was recirculated for review and comment by public and interested parties for a period of ~~30~~ *45* days after publication.¹²⁻¹³ Responses to any comments received and any necessary revisions to the *May 2009* Recirculated DEIR ~~will be~~ *are* provided in this *August 2009* FEIR. The FEIR will be considered for certification by the Board following the public review and comment period and before a decision is made on the proposed project.

1.4 *Final* Environmental Impact Report Organization

This *August 2009 FEIR* ~~Recirculated EIR~~ is organized into the following chapters so the reader can easily obtain information about the project and its specific issues. Additional information, such as the Initial Study/NOP, can be obtained in the ~~DEIR 2008~~ *December 2008 DEIR*.

- **Executive Summary** – Presents a summary of the proposed project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.
- **Chapter 1: Introduction** – Describes the purpose and use of the EIR, provides a brief overview of the proposed project, and outlines the organization of the EIR.

¹¹ *CEQA Guidelines*, CCR, Title 14, Chapter 3, §15000 et al., 2007.

¹² *CEQA Guidelines*, CCR, Title 14, Chapter 3, §15105(a), 2007.

¹³ As provided by *CEQA Guidelines* Section 15105 and *Guidelines Appendix K*(item 3), LAUSD has requested to make this Recirculated Draft EIR available for a 30-day public review and comment period as the document is a supplement to a Draft EIR previously submitted to the State Clearinghouse.

- **Chapter 2: Project Description and Environmental Setting** – Describes the project location, project details, project setting, existing physical conditions, and LAUSD’s overall objectives for the proposed project.
- **Chapter 3: Environmental Analysis** – Describes the existing conditions or setting before project implementation, methods and assumptions used in impact analysis, thresholds of significance, impacts that would result from the proposed project, and applicable mitigation measures that would eliminate or reduce significant impacts for each environmental issue.
- **Chapter 4: Alternatives Analysis** – Evaluates the environmental effects of project alternatives, including the No-Project Alternative and Environmentally Superior Project Alternative.
- **Chapter 5: Other CEQA Considerations** – Includes a discussion of issues required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, and growth inducing impacts.
 - *Chapter 6: Final EIR Introduction - Provides background on the review process for the NOP/IS and May 2009 Recirculated DEIR and provides guidelines about recirculation.*
 - *Chapter 7: Community Outreach and Public Review Process - Provides information related to the distribution of the NOP/IS and the May 2009 Recirculated DEIR, such as where the documents are available, how many copies were distributed, and to whom.*
 - *Chapter 8: Response to Comments - Presents a discussion on the comments received on the May 2009 Recirculated DEIR during the public review period.*
 - *Chapter 9: Changes to the DEIR – Provides the textual changes made to the May 2009 Recirculated DEIR by Chapter and page number. .*
 - *Chapter 10: Mitigation Monitoring and Reporting Plan - Provides a discussion and a table of the project impacts along with their mitigation measures.*
 - **Chapter 611: Acronyms and Abbreviations** – Presents a list of the acronyms and abbreviations relevant to the August 2009 FEIR-EIR.
 - **Chapter 712: References** – Identifies the documents and individuals consulted in preparing the August 2009 FEIR-EIR.
 - **Chapter 813: List of Preparers** – Lists the individuals involved in preparing this EIR and organizations and persons consulted.
 - **Appendices** – Present data supporting the analysis or contents of the August 2009 FEIR-EIR.
 - The Appendices include the following:
 - A – Initial Study and NOP*
 - AI – Comments Received on Initial Study*
 - B – Shade and Shadow Analysis*
 - C – Air Quality Model Outputs*
 - D – Geological Survey*
 - E – Health Risk Assessment*
 - F – Pipeline Safety Assessment*
 - G – Radio Frequency Memorandum*
 - H – Noise Modeling Outputs*
 - I - LACFD Station No. 54, Project Response Summary*

J - Traffic Impact Study / Pedestrian Safety Study
K-Exhibit to Letter Received from Celeste Shahl Brady, Stradling
Yocca Carlson & Rauth (July 10, 2009)

~~A — Air Quality Model Outputs~~

~~B — Pipeline Safety Assessment~~

Additional documents referenced in ~~this~~ **the May 2009** Recirculated DEIR that are not included in the appendices are available at LAUSD's Office of Environmental Health and Safety located at 1055 West 7th Street, 9th Floor, Los Angeles.

1.5 Availability of the Draft Environmental Impact Report

The **May 2009** Recirculated DEIR for the proposed project ~~will~~ **was** distributed directly to numerous agencies, organizations, interested groups, and persons for comment during the comment period. The **May 2009 Recirculated DEIR** is also available at the following locations:

- LAUSD, Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Local District 6 Office, 5800 South Eastern Avenue, Commerce;
- Bell High School, 4328 Bell Avenue, Bell;
- Huntington Park High School, 6020 Miles Avenue, Huntington Park;
- South East High School No. 2, 2720 Tweedy Boulevard, South Gate;
- South Gate High School, 3351 Firestone Boulevard, South Gate; and
- City of South Gate Public Library, 4035 Tweedy Boulevard, South Gate;

In addition, the **May 2009 Recirculated DEIR** is available online at the LAUSD Facilities Services Division website (<http://www.laschools.org/find-a-school>).

1.6 Public Meetings and Hearings

LAUSD received public input on the proposed project's Initial Study and NOP during the public review period and at a scoping meeting held on Thursday, April 24, 2008 at Bryson Elementary School, located at 4470 Missouri Avenue in South Gate, California. LAUSD also received public input on the proposed project's DEIR during the 45-day public review period and at a public meeting to be held at 6:00 PM on December 4, 2008 at Bryson Elementary School. A public meeting will not be held for the Recirculated DEIR. Comments from the community and interested parties are encouraged at all public hearings before the Facilities Committee and the Board. **The Board Meeting to act on this August 2009 FEIR is tentatively scheduled for August 25, 2009. Please contact the Board Secretariat Office at (213) 241-7002 to confirm the date and time of the upcoming Board meeting.**

1.7 Agency Comments

If this document includes information necessary for your agency to meet any statutory responsibilities related to the proposed project, Per CEQA Guidelines 15087, LAUSD needs to know solicited public comment the views of your agency regarding the scope and content of the environmental information included in this August 2009 FEIR. Your agency will need to use the environmental documents prepared by LAUSD when considering any permits or other approvals necessary to implement the project. The environmental topics studied by LAUSD are provided in Chapter 3 of this ~~Recirculated~~ DEIR. The project description, location, and the environmental issues to be addressed in this EIR are contained in the attached materials. Due to the time limits mandated by state law, all written responses ~~must be sent to LAUSD~~ were requested on or before ~~June 27~~ July 13, 2009, or a minimum of ~~30~~ 45 days after publication of this notice [May ~~22-28~~].¹⁴ Please send your response to:

Gwenn Godek, Senior CEQA Project Manager/Consultant
 Los Angeles Unified School District
 Office of Environmental Health and Safety
 1055 West 7th Street, 9th Floor
 Los Angeles, CA 90017

Your comments may also be sent by fax to (213) 893-7412 or by email to: ceqa-comments@laschools.org. Please include "South Region High School No. 9" in the subject line. Agency responses should include the name of a contact person within the commenting agency. In compliance with CEQA Guidelines Section 15088, commenting agencies were provided with responses to their comments on the DEIR ten days prior to the tentatively scheduled certification date of August 25, 2009. Responses to all comments are provided in Chapter 8.0 of this FEIR.

1.8 Revisions to the Revised Draft Environmental Impact Report

Revisions to the May 2009 Recirculated DEIR resulting from public, agency, and staff review are summarized in Chapter 9.0. As provided in CEQA Guidelines Section 15088.5(a), the lead agency is authorized to include additional information in a FEIR including project modifications, changes in the environmental setting, additional data, or other information. The modifications provided herein are minor in nature, and neither result in a new, substantial environmental impact nor substantially increase the severity of an environmental impact already studied in the May 2009 Recirculated DEIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in CEQA Guidelines Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

1. When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;

¹⁴ CEQA Guidelines, CCR, Title 14, Chapter 3, §15105 et al., 2007.

2. When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificance);
3. When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or
4. When the EIR was so fundamentally inadequate that meaningful public review and comment were precluded.

The modifications throughout this August 2009 FEIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this August 2009 FEIR.

CHAPTER 2.0

Project Description and Environmental Setting

2.1 Project Background and Objectives

Project Background

LAUSD is faced with a critical need to provide new school facilities throughout the District to accommodate students in all grade levels. The LAUSD boundary extends beyond the City of Los Angeles and includes the cities of Cudahy, Gardena, Huntington Park, Lomita, Maywood, San Fernando, South Gate, Vernon, West Hollywood, and parts of nineteen other municipalities, and portions of unincorporated Los Angeles County. As of the 2007-2008 school year, LAUSD serves 694,288 students, has 45,473 teachers, and has 38,494 non-teaching employees.¹ The proposed project is part of Phase III of the New School Construction Program. With the passage of Local Measures K and R; and Propositions 47 and 55, funding was provided for Phase II, Phase III, and Phase IV of the Program.^{2,3,4} Phase III would also implement a multi-track, 180-day instructional calendar to increase capacity at specified schools. To achieve these objectives, LAUSD estimates that about 165,000 new classroom seats would be required.⁵

The Program objectives are implemented through the Strategic Execution Plan, which provides goals for the current phase (Phase III) of the Program.⁶ The goals of Phase III are to:⁷

- Eliminate involuntary busing and return students to their neighborhood school;
- Move all middle and high schools to a traditional two-semester calendar;
- Eliminate Concept 6 elementary schools while maintaining two-semester elementary schools on their current calendars;⁸ and
- Implement full-day kindergarten District-wide.

¹ LAUSD, *Fingertip Fact Sheet 2007 – 2008*. website: http://notebook.lausd.net/pls/ptl/docs/page/ca_lausd/lausdnet/offices/communications/communications_facts/0708eng_fingertip_fact_sheet.pdt, accessed May 28, 2008.

² California Secretary of State, *Proposition 47, Kindergarten-University Public Education Facility Bonds Act*, 2003.

³ LAUSD, *Measure K Early Education Program Expansion Act*, 2003.

⁴ LAUSD, *Safe and Healthy Neighborhood Schools Act (Measure R)*, enacted November 5, 2003.

⁵ LAUSD, *OEHS New School Construction Program, Draft EIR*, March 2004, p. 2-6.

⁶ LAUSD, *Strategic Execution Plan*, January 2008, pp. 8 and 12.

⁷ *Ibid.*

⁸ Concept-6 refers to multi-track, year-round instructional calendar.

For the purposes of facilities planning, LAUSD divides the District into three planning regions, each containing one or more Local Districts, for a total of eight districts. The proposed project is located in South Planning Region, Local District 6.

Project Objectives

The LAUSD Strategic Execution Plan sets forth goals for school facilities.⁹ In 2005, the Board approved Phase III that included SRHS No. 9, to be located at the proposed project site. As part of the program, implementation of the proposed project is intended to fulfill the following guiding principles:

- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Create schools that are centers of community engagement both during and outside of normal operating hours;
- Relieve overcrowding at Bell, Huntington Park, South East, and South Gate High Schools by providing educational facilities for grades nine through twelve;
- Avoid displacement of existing residences and businesses where feasible;
- Maintain traditional classroom instruction hours for high school students of approximately 8:00 am to 3:00 pm;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities;
- Maximize the use of District-owned land; and
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources the wise and efficient use of limited land and public resources.

2.2 Project Description

Project Components

Proposed Facilities

The proposed project includes the development of a high school within LAUSD South Region, Local District 6. The proposed project encompasses approximately 34 acres, which would support the 145,000 s.f. of campus development. Three separate two-story (approximately 34 feet) classroom buildings would be constructed to accommodate 1,431 students. Additional one- and two-story (approximately 34 feet) school buildings would be located in between the classroom facilities and would accommodate a multipurpose room, a music and drama hall, a gymnasium, and an administration building. The additional facilities would not exceed two stories in height (approximately 34 feet). Each classroom building would provide a lunch shelter; an additional food service facility would be located adjacent to the music and drama hall. A 133-space surface parking lot would be located on the far west portion of the site, and athletic and playfields would be located to the east and south of the buildings for soccer, football, softball, and baseball

⁹ LAUSD, *Strategic Execution Plan*, January 2008, pp. 8 and 12.

activities. *An additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.* The proposed school would be separated from adjacent residential properties to the north by an eight-foot wall.

Nighttime security lighting and nighttime lighting for the playfields located east of the school buildings would be provided. The lighting system for the proposed project would be designed in accordance with LAUSD design guidelines. Security and nighttime lighting would not be provided for the playfields to the south of the school buildings. Pedestrian access to the proposed project site would be from both Adella Avenue and Tweedy Boulevard. The portion of Adella Avenue that traverses the project site would be vacated. A cul-de-sac would be constructed at the southern terminus of Adella Avenue and the northern boundary of the school site. A private service road to the east of the turn-around would provide access to the maintenance and food service areas. A private service road west of the turn-around would provide access/egress to the parking lot. **Figure 2.1, Conceptual Site Plan**, shows the proposed conceptual site plan for the proposed project.

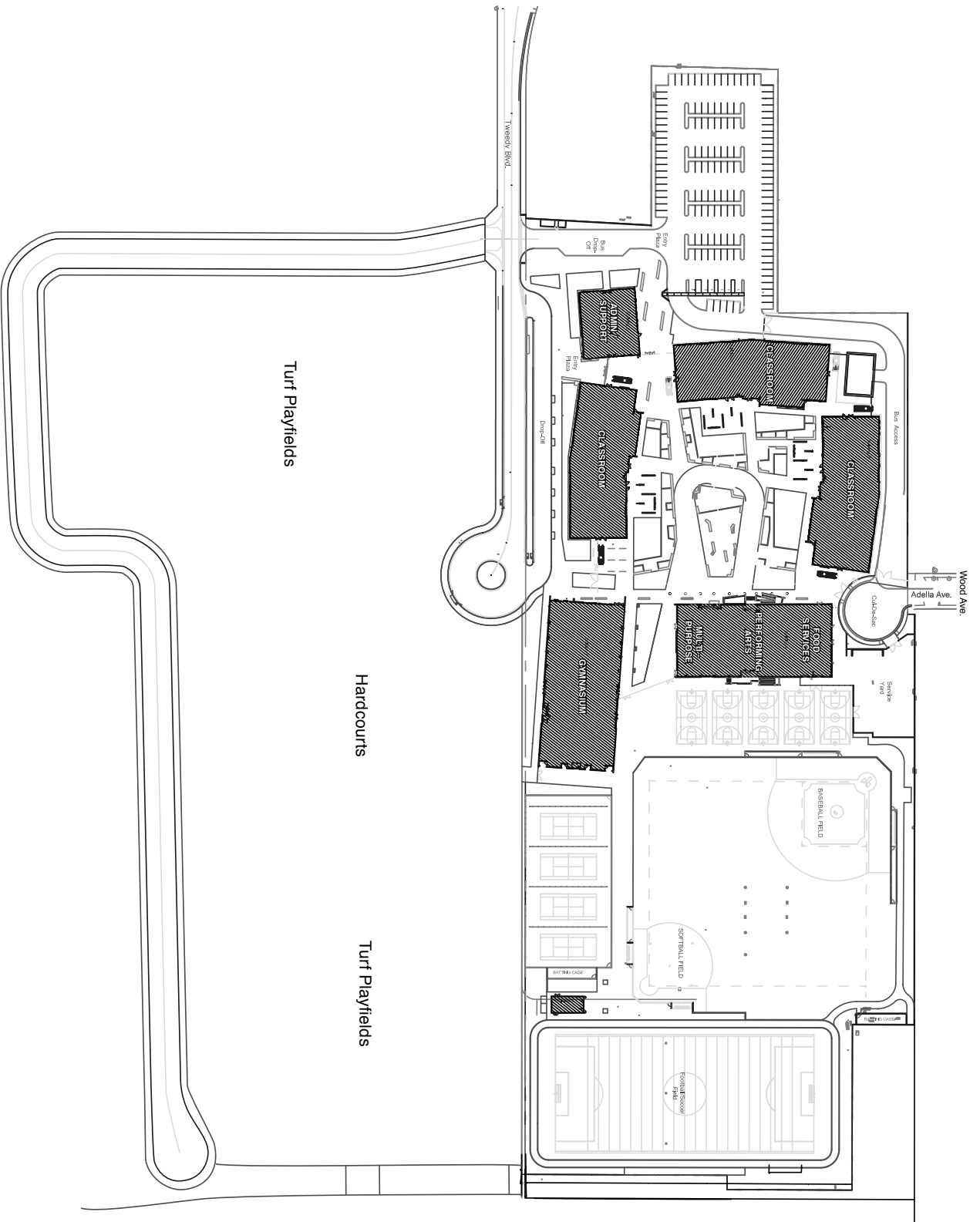
Proposed Programs

Traditional School. The proposed project would provide approximately 1,431 two-semester seats for students in grades nine through 12, and would require approximately 125 faculty, staff and volunteers (full- and part-time). Current plans are to operate the proposed project on a traditional single-track, two-semester, 180-day calendar to relieve overcrowding at Bell, Huntington Park, South East and South Gate High Schools. School instruction hours would be from approximately 8:00 AM to 3:00 PM, with staff and students arriving on campus between approximately 7:00 and 8:00 AM and leaving between approximately 3:00 PM and 5:00 PM.

Summer School. The proposed project may also include summer school sessions, which typically run between early-July and mid-August from approximately 8:00 AM to 12:30 PM. The number of students, faculty, and staff attending the summer sessions varies from year to year, depending on student need and available capacity.

Adult Education. The proposed project would include adult education programs, which typically run throughout the year outside of normal school hours. Fifteen classrooms would be made available for adult education. The number of adult students, faculty, and staff participating varies from session to session, depending on the adult education programs presented, the need, and available capacity.

School-Related Events. 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. Nighttime lighting would not be constructed for the field on the south of the campus.



SOURCE: LAUSD, 2008.

LAUSD #9 . 206227.02

Figure 2.1

Proposed Conceptual Site Plan

Community Use. When the school facilities are not scheduled for school or District-related events, community members may obtain a permit from the LAUSD to use the school facilities by means of the Civic Center Act.¹⁰ Events may include community and City use of the playfields, multipurpose room, and classrooms. Operation of the school facilities for community use may occur outside normal school operating hours, generally between 3:00 PM and 10:00 PM during the weekdays and all day on the weekends. There would be no nighttime use of the playfields located on the southern part of the site. Community uses may vary, depending on the community's needs and applications for permits.

Access and Parking

Pedestrian access to the proposed project site would be from both Tweedy Boulevard and Adella Avenue. The proposed project includes improvements along Tweedy Boulevard between Atlantic Avenue and the school property line. These improvements would include an eight-foot sidewalk along the northern side of Tweedy Boulevard. The proposed sidewalk would need to be constructed within the existing right-of-way and would require approval by the City of South Gate.

Drop-off and pick-up zones for passenger cars would be accessible from Tweedy Boulevard. It is anticipated that traffic would enter through Tweedy Boulevard and would loop around a one-way drop-off area in front of the administration building and classroom building. The drop-off zone would be one-way to alleviate congestion. The bus drop-off for special needs students would be located at a separate drop-off area, to the west of the administration building.

Burtis Street and portions of Adella Avenue and Tweedy Boulevard would be vacated. Tweedy Boulevard would terminate at the western school boundary, transitioning into the school's on-site passenger drop-off area and access to faculty/staff parking. Adella Avenue would terminate at the northern school boundary with a cul-de-sac. A private service road to the east of the cul-de-sac would provide access to the maintenance and food service areas. A private service road west of the cul-de-sac would provide access/egress to the staff parking lot.

A public road would be constructed by LAUSD to re-route traffic to two existing properties located to the southeast of the proposed project site. This roadway would begin at the terminus of Tweedy Boulevard and terminate at the eastern end of the existing industrial uses. The new public road would have a 60-foot total width and would include sidewalks (refer to Figure 2.1). **An additional 170 new parking spaces along the road would be provided.**

Parking facilities would be constructed to meet LAUSD design guidelines of 2.5 spaces per high school classroom.¹¹ Approximately 133 parking spaces would be provided for faculty and staff during school operating hours. Access to the parking lot would be via Tweedy Boulevard and the service road accessed via Adella Avenue. The parking area may be available for after school LAUSD sponsored events and community events.

¹⁰ California Education Code Section 38130 et seq.

¹¹ LAUSD, *School Design Guide. Section 2.3 Vehicular Access and Parking (a) Parking Space Requirements*, October 2003.

Project Location and Site Characteristics

Location

The proposed project site is located in the City of South Gate in southeastern Los Angeles County (refer to **Figure 2.2**, *Regional Location Map*). This site is east of the intersection of Adella Avenue and Tweedy Boulevard, and is generally bounded by residential development to the north, beyond which is Wood Avenue; residential, commercial and light industrial development to the south, beyond which is Aldrich Avenue; commercial uses to the west, beyond which is Atlantic Boulevard; and the Los Angeles River channel to the east. Interstate 710 (I-710) is also located approximately 1,130 feet east of the proposed project site. Refer to **Figure 2.3**, *Proposed Project Location Map*.

Existing Land Uses

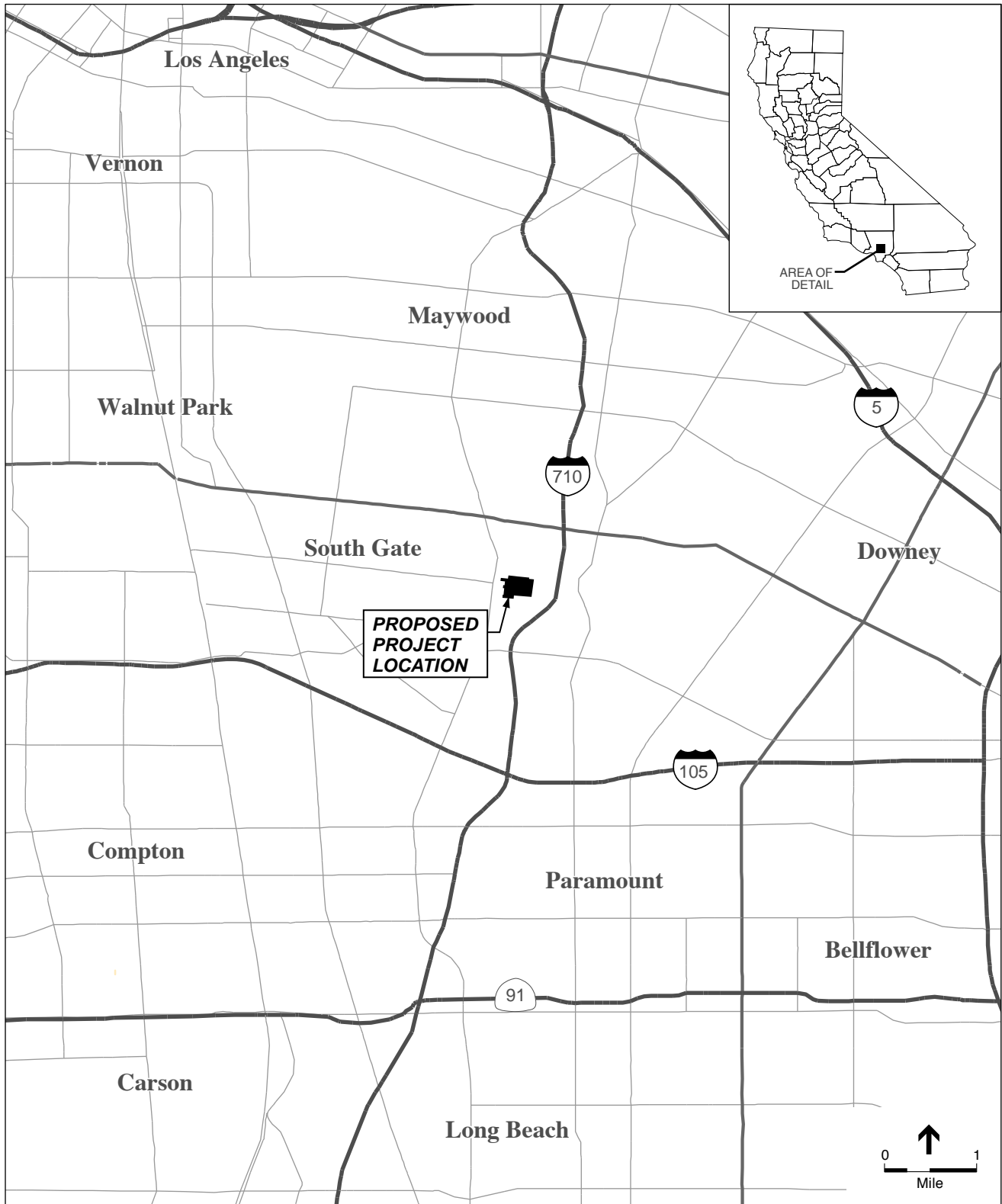
The proposed project site is situated in an urbanized area; most of the parcels that comprise the site were formerly developed with industrial buildings and asphalt parking areas. Refer to **Figure 2.4**, *Existing and Surrounding Setting*, for the existing setting. Most of the industrial buildings have since been demolished. As a result, the site has an abandoned appearance and is primarily vacant, with the exception of two warehouses, one small building and four modular storage buildings of various dimensions. Of the buildings remaining on-site, one is used as a LAUSD field office and the other structures are vacated. All remaining structures, included building foundations and asphalt parking areas, would be removed during construction of the proposed project. The site is roughly square in plan and the topography is relatively level, with an elevation of approximately 95 feet above mean sea level.¹²

Surrounding Land Uses

The proposed project site is located in the County of Los Angeles, within the City of South Gate. The cities and communities surrounding the proposed project site include the City of Vernon; City of Bell; City of Maywood; City of Cudahy; City of Huntington Park, and the City of Downey. The proposed project site lies within a highly urbanized area consisting primarily of commercial, industrial, and residential uses. The surrounding area is located on generally level terrain with the exception of the Los Angeles River levee adjacent to and east of the proposed project site. Refer to Figure 2.4 for the surrounding setting.

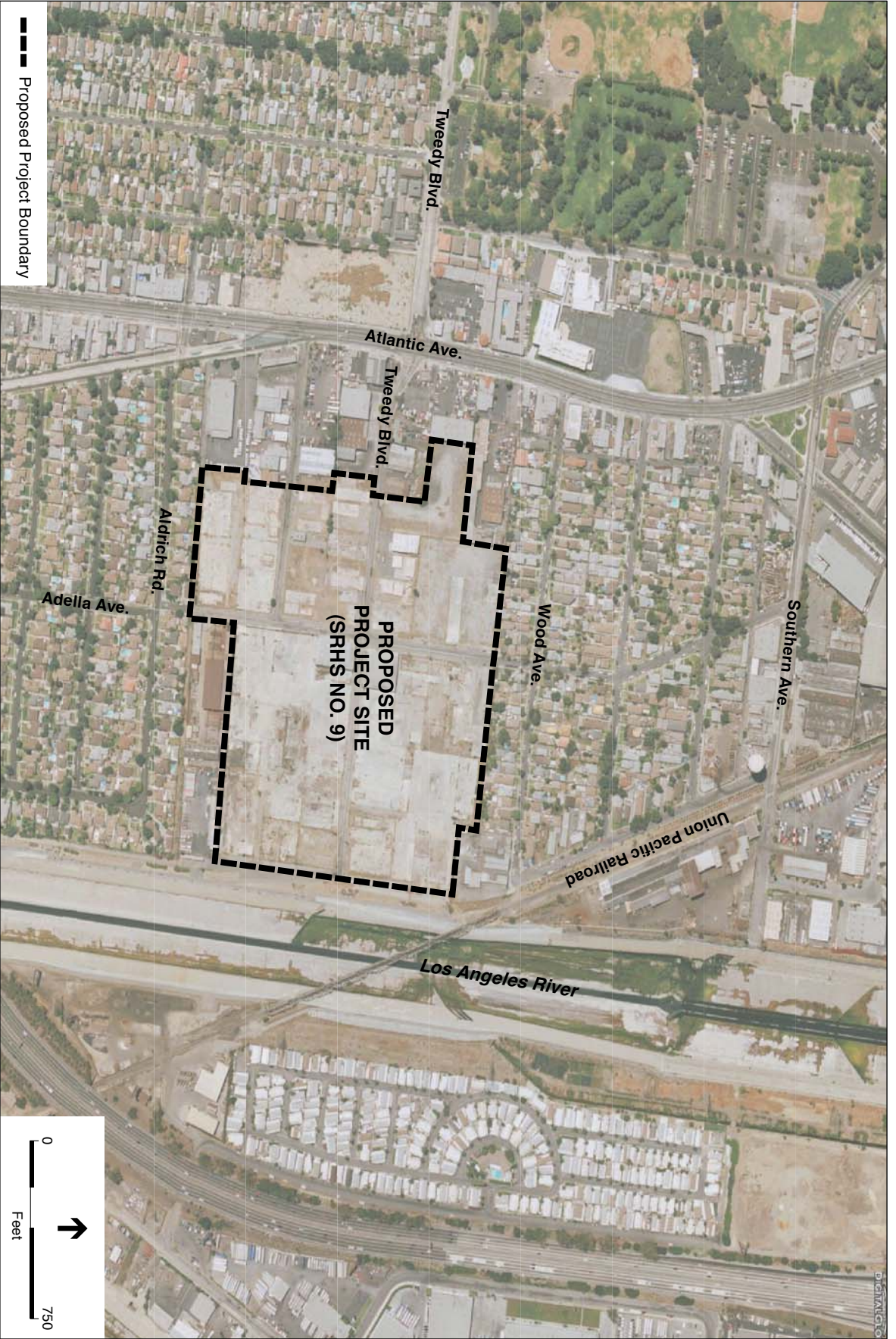
Land uses to the north include residential development, followed by Wood Avenue. Residential, commercial and light industrial uses are located to the south. Union Pacific Railroad (Spur No. 810961T) is located to the northeast. Commercial and light industrial development are adjacent to the southern parameter of the site, including an auto repair business, steel manufacturing facility, and a distribution center. The commercial and light industrial development to the south is followed by Aldrich Avenue and residential development. Commercial uses occur to the west, followed by Atlantic Boulevard which contains dense commercial development including auto repair and fueling stations. The Los Angeles River is located to the east followed by I-710 (located approximately 1,130 feet east from the site).

¹² Geomatrix Consultants, Inc. *Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report for Proposed South Region High School No. 9 and South Region Middle School No. 4*, City of South Gate, California, 2006, p 2.



SOURCE: Street Map USA, 2007.

LAUSD #9 . 206227.02
Figure 2.2
Regional Location Map



SOURCE: Globexplorer, 2007; ESA, 2008.

LAUSD #9 . 206227.02

Figure 2.3

Proposed Project Location Map



SOURCE: Globexplorer, 2007; ESA, 2008.

LAUSD #9 . 206227.02
Figure 2.4
 Existing and Surrounding Setting

General Plan Designation and Zoning

The 34-acre site has a Manufacturing land use designation.¹³ Refer to **Figure 2.5, Existing Land Use and Zoning Designations**.¹⁴ The proposed project site is zoned M-3, Heavy Manufacturing.¹⁵ Schools are permitted in M-3 zones.¹⁶ Land use designations around the proposed project site are Upper-Medium Density Residential to the north; Manufacturing followed by Low Density Residential to the east (beyond the Los Angeles River); Manufacturing and Low Density Residential to the south; and Manufacturing followed by Mixed-Use Commercial/Industrial to the west.¹⁷ The California Legislature granted school districts the authority to exempt their schools from applicable general plans and zoning requirements, provided the school district has complied with the terms of Government Code Section 53094. Namely, school districts must comply with the following:

- Two-thirds of the Board must vote to render the zoning ordinance inapplicable, and
- Within ten days of taking the action, the LAUSD Board must give the City notice of the action under Section 53094.

In accordance with this authority, on October 11, 2005, the LAUSD Board adopted a resolution on the basis of Government Code Section 53094 exempting the proposed project from the applicable zoning designation.¹⁸ The LAUSD Board provided proper notice to the City in compliance with Government Code Section 53094 at that time.

Construction Schedule

Once the proposed project has been approved by the Board, construction of the proposed school would begin. In order to accommodate construction, all structures would be immediately demolished and removed from site. Prior to demolition, existing structures would be tested for the presence of asbestos and lead-based paint. If asbestos or lead is found, the contaminated material would be abated in accordance with all applicable requirements, including South Coast Air Quality Management District (SCAQMD) Rule 1403, and disposed of properly.¹⁹ Uncontaminated materials would be recycled to the extent feasible, and the remaining debris, existing vegetation, and other structures would be removed and disposed of at an approved landfill. Soil remediation would be completed during this phase, under oversight by the State of California Department of Toxic Substances Control (DTSC).

¹³ City of South Gate Planning Department, Zoning Ordinance information. Accessed February 12, 2008.

¹⁴ South Gate Land Use Policy Map, 1986, <http://www.sogate.org/download/index.cfm/fuseaction/download/cid/623/>. Accessed February 12, 2008.

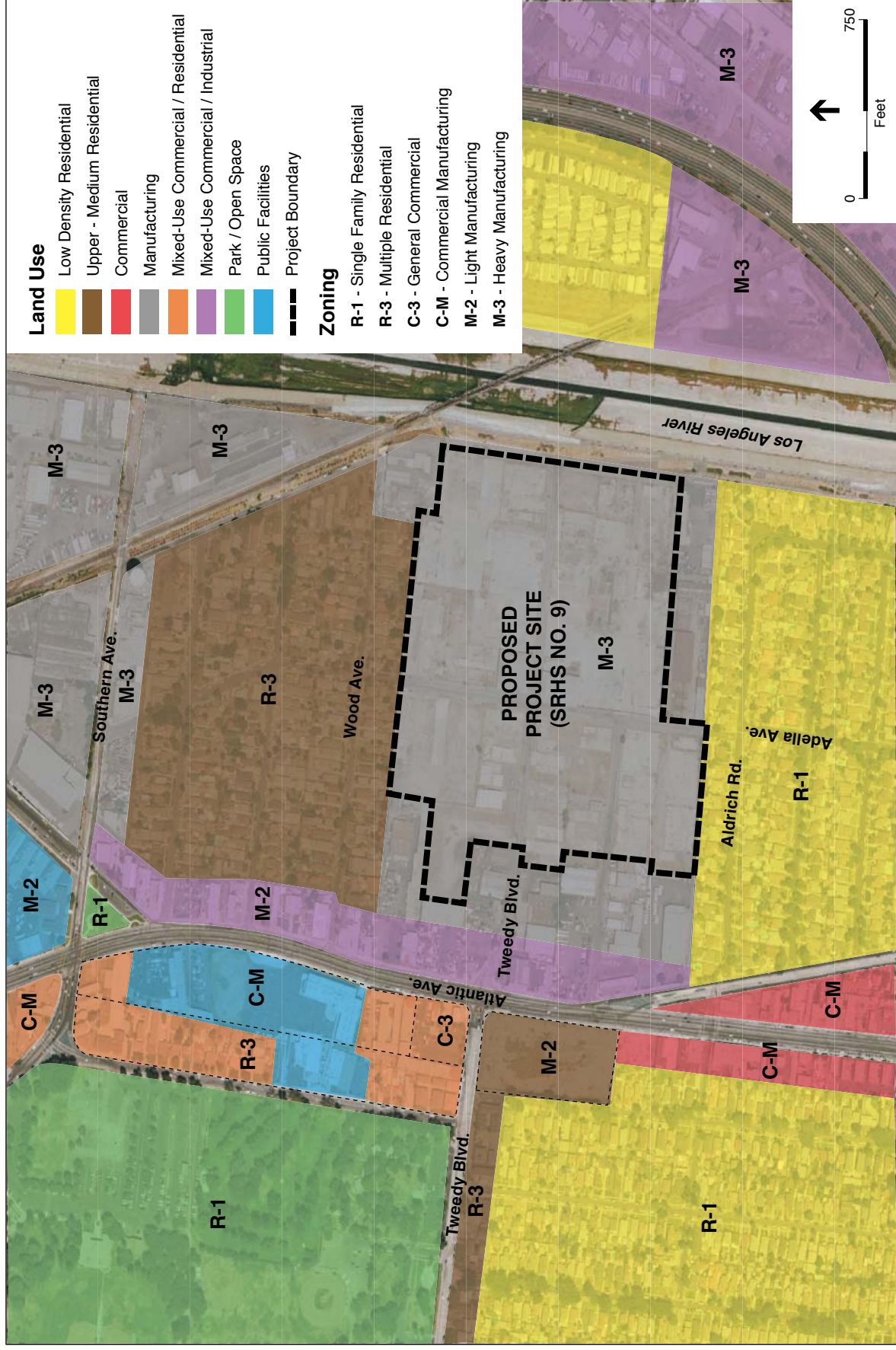
¹⁵ South Gate Zoning Map, Part III, <http://www.sogate.org/download/index.cfm/fuseaction/download/cid/622/>. Accessed February 14, 2008.

¹⁶ City of South Gate Planning Department, Zoning Ordinance Chapter 11. 11.24.010 (M-3) and 11.22.010 (M-2).

¹⁷ South Gate Land Use Policy Map, 1986, <http://www.sogate.org/download/index.cfm/fuseaction/download/cid/623/>, accessed February 12, 2008.

¹⁸ LAUSD Board of Education, *Resolution by the Los Angeles Unified School District Rendering Specified City and County Zoning Ordinances Inapplicable to the District's Acquisition and Use of Property for Designated Schools Pursuant to Government Code Section 53094 and Making Findings of Fact Related Thereto*, adopted October 11, 2005, Reference Board of Education Report No. 69-05/06.

¹⁹ South Coast Air Quality Management District (SCAQMD) Rule 1403. *Asbestos Emissions From Demolition/Renovation Activities*, Adopted October 6, 1989, Amended April 8, 1994.



SOURCE: City of South Gate, 2008.

LAUSD #9 . 206227.02
Figure 2.5
 Existing Land Use
 and Zoning Designations

DTSC's determination would confirm the elimination of any risk to the health and safety of students, faculty, employees and other persons. The schedule described above would assure this determination would occur before the school facilities could be occupied, and would be consistent with the Initial Study's determination that the proposed project would not result in a significant hazardous materials impact.

Construction of the proposed project is anticipated to begin in the summer of 2010 and be completed in the summer of 2012. The target opening date is the fall of 2012. Due to the on-site contamination resulting from previous land uses, remediation would be required.²⁰ Currently, the Remediation Plan is under development and remediation activities are scheduled for implementation in 2009. The proposed project site would be graded and compacted as needed, structural piles will be driven into the ground, followed by completion of necessary trenching (e.g., for utility hookups to buildings). The building footings, buildings, and utilities would then be constructed. The area surrounding the buildings would be covered with concrete and asphalt; new curb-cuts and driveways would be added; new sidewalks would be located along the perimeter of the proposed project site; landscaping, site fencing, and any final work would be completed. The construction site and staging areas would be clearly marked and barriers installed. Construction staging areas would be located north of Tweedy Avenue, where the parking lot and classroom areas are proposed.

2.3 Project Design Features

Collaborative for High Performance Schools (CHPS) Criteria

LAUSD is the first school district in the United States to adopt and implement the Collaborative or High Performance Schools (CHPS) Criteria.²¹ CHPS is a school design standards-setting organization associated with the "Leadership in Energy and Environmental Design" (LEED) group. The Board adopted a Resolution on High Performance School Facilities requiring Phase II and future phase schools to be certified according to the CHPS.²² These measures are considered beneficial to improving environmental quality by avoiding or mitigating impacts. LAUSD has incorporated these into the project design and operation in accordance with federal, state and local regulations, as well as standard LAUSD practices. These measures were assumed to be part of the District's projects, as they may apply to specific projects and are standard conditions, not mitigation measures. The proposed project would include at least of 32 CHPS criteria points, the minimum required to be considered a certified CHPS school. CHPS recommends flexible standards to promote energy efficiency, water efficiency, site planning, materials, and indoor environmental quality.

²⁰ Parsons, *Phase I Soil-Gas Investigation Report for the proposed South Region Middle School No. 4 and South Region High School No. 9*, February 2007.

²¹ CHPS, *High Performance Schools Best Practices Manual, Volume III Criteria*, website www.CHPS.net/manual/documents/2002_updates/CHPSvIII.pdf, accessed November 1, 2001.

²² Los Angeles City Board of Education Resolution, *Sustainability and the Design and Construction of High Performance Schools*, October 28, 2003.

LAUSD Design Standards and Best Management Practices

Some of the following design standards are included as part of the Program Design BMPs, and may be applied to this specific project.

Noise/Acoustics. An analysis of the acoustical environment of the project site (such as traffic) and characterization of planned building components (such as heating, ventilation, and air conditioning) shall be conducted to achieve a classroom acoustical performance of 45 dBA L_{eq} background noise level (unoccupied) or better.²³ As excessive noise from operation of the new school site could disturb adjacent residential uses, the proposed project would be separated from the adjacent residential uses by an eight-foot wall on the north.

Geological Hazards. A Seismic Hazard Evaluation will be completed for each new school construction project, where appropriate, to satisfy certain state requirements.^{24,25, 26}

Light and Glare. All luminaries, or lighting sources, in connection with school construction projects shall be installed in such a manner as to minimize glare for pedestrians and drivers, and to minimize light spilling onto adjacent properties.

Water Supply. LAUSD shall require its construction contractor to coordinate with the City of South Gate 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, CHPS require the landscape and ornamental water use budget to conform to any applicable local Water Efficient Landscape Ordinance. If no local ordinance is applicable, then the water use budget must conform to the landscape and ornamental budget outlined by the California Department of Water Resources.

Reuse of Historical Resources. Where feasible, LAUSD shall require its construction contractor reuse rather than destroy historical resources, as identified in the project-specific Historic Resources Survey. There are no historical resources located on the proposed project site.

Fire Protection. LAUSD shall reduce impacts to fire protection services in connection with new construction projects, by:

- Having local fire jurisdictions review and approve site plans prior to the State Fire Marshal's final approval; and

²³ The unit of measurement of environmental noise is the decibel (dB). To better approximate the range of sensitivity of the human ear to sounds of different frequencies, the A-weighted decibel scale was devised. Because the human ear is less sensitive to low-frequency sounds, the A-scale de-emphasizes these frequencies by incorporating frequency weighting of the sound signal. When the A-scale is used, the decibel levels are shown as dBA. L_{eq} is defined as the equivalent continuous sound pressure level, which represents the average of a 24-hour noise history at a location.

²⁴ Title 24 CCR.

²⁵ *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. Special Publication 117. Adopted by the State Mining and Geology Board in Accordance with the Seismic Hazards Mapping Act of 1990. March 13, 1997.

²⁶ *California Geological Survey Checklist for the Review of Geological/Seismic Reports for California Public Schools, Hospitals, and Essential Services Buildings* (Note 48), October 2007.

- Providing a full site plan for the local review, including the location of all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting Fire Department access, with unobstructed fire lanes for access indicated.

Energy Efficiency. Under CHPS, new school designs must exceed the California energy efficiency standards by 10 percent, or energy efficient lighting with occupancy controls and/or economizers on package equipment must be included in the design.²⁷

Under CHPS, a designated commissioning agent or district official shall perform, monitor or verify that the new school building's energy systems operate as intended and that effective training has been provided to maintain building performance to protect indoor air quality and maintain superior energy performance in accordance with requirements of the California Occupational Safety and Health Administration (Cal/OSHA) Minimum Building Ventilation Standard, Title 8, Section 5142.

Waste Reduction and Efficient Material Use. Under CHPS, a new school project must meet local ordinance requirements for recycling space and provide an easily accessible area serving the entire school that is dedicated to the separation, collection, and storage of materials for recycling including—at a minimum—paper (white ledger, mixed, and cardboard), glass, plastics, metals, and landscaping waste.

Indoor Air Quality. Under CHPS, a new school project must meet the performance requirements of California Occupational Safety and Health Administration (Cal/OSHA) Minimum Ventilation Standard, which requires the design of building ventilation systems to: a) ensure that the continuous delivery of outside air is no less than the governing design standard; and b) be in operation at all times rooms are occupied. The design must ensure that the supply operates in continuous mode and is not readily defeated (e.g., by blocked registers or windows) during occupancy periods.

Thermal Comfort. Under CHPS, a new school project must comply with the American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) Standard for thermal comfort standards, including humidity control within established ranges per climate zone.²⁸ Indoor design temperature and humidity conditions for general comfort applications shall be determined in accordance with appropriate American National Standards Institute or ASHRAE standards.^{29, 30}

LAUSD Construction Best Management Practices

LAUSD shall require its construction contractor to comply with all applicable rules and regulations in carrying out the construction of the proposed project. The proposed project will also comply with LAUSD Construction BMPs, which are established and refined as part of LAUSD's current building efforts. These BMPs are denoted as follows:

²⁷ California Building Standards Commission. Title 24-2001, *California Energy Efficiency Standards*. 2001.

²⁸ American Society of Heating, Refrigeration and Air-Conditioning Engineers (ASHRAE) Standard 55-1992, Addenda 1995.

²⁹ American National Standards Institute (ANSI) Standards /ASHRAE 55-1992.

³⁰ ASHRAE 55-1992 or Chapter 8 of the ASHRAE Handbook, Fundamentals Volume, 1993.

Water Quality and Hydrology. Under CHPS requirements, LAUSD's construction contractor shall control erosion and the transport of soil and other pollutants from the site during construction. LAUSD's construction contractor shall design and implement a site-specific plan that incorporates the use of BMPs in compliance with the U.S. EPA's National Pollutant Discharge Elimination System (NPDES), obtained from the Los Angeles Regional Water Quality Control Board (LARWQCB). The plan shall include a Storm Water Pollution Prevention Program (SWPPP), to be prepared in accordance with Part 2 of the NPDES Construction General Permit: General Permit for Stormwater Discharges from Construction Activities. The plan shall meet the following objectives:

- Prevent soil loss by wind and water erosion, including protecting topsoil by stockpiling for reuse.
- Prevent transport of sediment and particulate matter to storm sewers or receiving waters and/or to surrounding ambient air.
- Eliminate or reduce off-site discharge of construction waste.

LAUSD's construction contractor shall properly discharge any water accumulation within the excavation pit in accordance with BMPs and a dewatering plan that must be developed and approved prior to construction as part of the NPDES General Construction Storm Water Permit.

Construction Traffic. LAUSD shall require its contractors to submit a construction worksite traffic control plan to the City of South Gate for review prior to construction. The plan shall show the location of any haul routes, construction hours, protective devices, warning signs, and access to abutting properties.

Construction Air Emissions. LAUSD shall require its construction contractors to comply with all applicable SCAQMD rules (i.e., Rule 403, Fugitive Dust) and regulations in carrying out construction activities. To reduce the potential for significant hazardous emissions during a removal action, LAUSD or its construction contractor shall:

- Maintain slow speeds with all vehicles;
- Load impacted soil directly into transportation trucks to minimize soil handling;
- During dumping, minimize soil drop height into transportation trucks or stockpiles;
- During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks; and,
- Place stockpiled soil in areas shielded from prevailing winds.

Construction Noise. LAUSD shall require the construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. LAUSD shall require its construction contractor to provide advance notice of the start of construction to include all noise sensitive receptors, businesses, and residences adjacent to the project site and specifically where and when construction activities will occur and provide contact information for filing noise complaints. During construction activities, the construction contractor shall, to the extent feasible, locate portable equipment and shall store and maintain equipment away from the adjacent residents. LAUSD shall require its construction contractors to comply with all applicable

noise ordinances of the affected jurisdiction. LAUSD shall include the City of South Gate noise ordinance in all construction contracts.

Hazardous Materials Management. LAUSD shall require its construction contractor to assess and remediate hazardous materials at the proposed project site under supervision of DTSC. LAUSD shall require its construction contractors to comply with SCAQMD Rule 1166 (Volatile Organic Compounds Emissions [VOCs] from Decontamination of Soil) for the removal of VOCs contaminated soils and will comply with the *DTSC Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed School Sites* and SCAQMD Rule 1403 (Asbestos Removal) for removal of asbestos and lead-based paint containing materials prior to demolition.

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

Waste Management. Under CHPS, and to ensure optimal diversion of solid resources generated by the proposed project, LAUSD shall require its contractors to reuse, recycle, and/or salvage at least 50 percent (by weight) of the non-hazardous construction and demolition debris to foster material recovery and reuse and to minimize disposal in landfills.

Relocation Assistance Program. To ensure optimal diversion of solid resources generated by a project, LAUSD shall require its contractors to reuse, recycle, salvage or dispose of non-hazardous waste materials generated, when feasible, during demolition and/or new construction to foster material recovery and reuse and to minimize disposal in landfills.

2.4 Required Permits and Approvals

As required by *CEQA Guidelines*, this section provides, to the extent the information is known to LAUSD, a list of the agencies expected to use the Recirculated DEIR in their decision making and a list of permits and other approvals required to implement the project.³¹

Lead Agency Approval

This EIR is intended to provide environmental review for the proposed project in accordance with the requirements of CEQA. The Final EIR must be certified by the Board of Education as to its adequacy in complying with the requirements of CEQA before taking any action on the proposed project. The Board will consider the information contained in the EIR in making a decision to approve or deny the proposed project. The analysis in the EIR is intended to provide environmental review for the whole of the proposed project, including planning of the proposed project, site clearance, excavation and grading of the proposed project site, construction of school buildings and associated facilities, and the ongoing operation of the school and associated school programs in accordance with CEQA requirements.

³¹ *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15124(d), 2007.

Other Required Permits and Approvals

A public agency, other than the lead agency, that has discretionary approval power over a project is known as a “Responsible Agency,” as defined by *CEQA Guidelines*.³² The Responsible Agencies and their corresponding approvals for this project include:

State of California

- Department of Toxic Substances Control (Determination of “No Further Action”)
- California State Allocation Board (Approval of Funding)
- California Department of Education
 - School Facilities Planning Division (Approval of Final Plan and Final Site)
- Department of General Services
 - Office of Public School Construction (Approval of Funding)
 - Division of the State Architect (Approval of Construction Drawings)

Regional Agencies

- Los Angeles Regional Water Quality Control Board (NPDES permit, construction stormwater run-off permits)

County of Los Angeles

- Fire Department (Approval of Site Plan for Emergency Access)
- Department of Public Works (Storm Drainage)
- Metropolitan Transit Authority (MTA)

City of South Gate

- Public Works Department (Water, Sanitary System and Roads)

Reviewing Agencies

Reviewing Agencies include those agencies that do not have discretionary powers, but that may *have reviewed* the EIR for adequacy and accuracy. Potential Reviewing Agencies include:

State of California

- Department of Transportation
- Resources Agency
- Department of Conservation
- Department of Fish and Game
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol
- California State Parks

³² *Ibid.*, §15381

- Public Utilities Commission

City of South Gate

- Parks and Recreation Department
- Police Department
- Community Development Department (Planning and Zoning Division)

Regional Agencies

- South Coast Air Quality Management District
- Southern California Association of Governments

2.5 Cumulative Scenario

Cumulative impacts refer to the combined effect of project impacts with the impacts of other, present and reasonably foreseeable future projects³³ Both CEQA and the *CEQA Guidelines* require that cumulative impacts be analyzed in an EIR. As set forth in the *CEQA Guidelines*,³⁴ the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, “a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable.”³⁵

According to the *CEQA Guidelines*:

“Cumulative impacts” refer to two or more individual effects which, when considered together, are considerable and which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects.
- (b) The cumulative impact from several projects is the change in the environment, which results from the incremental impact of the proposed project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.³⁶

In addition, as stated in the *CEQA Guidelines*, it should be noted that:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.³⁷

Cumulative impact discussions for each issue area are provided in the technical analyses contained within Chapter 3 (Environmental Analysis).

³³ *CEQA Guidelines*, CCR, Title 14, Article 9, Chapter 3, § 15130, 2007.

³⁴ *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15130(b), 2007.

³⁵ CEQA, Public Resources Code (PRC), Title 14, §21083(b), 2005.

³⁶ *CEQA Guidelines*, CCR, Title 14, Article 6, Chapter 3, §15355, 2007.

³⁷ *Ibid.*, §15064(h)(4).

As previously stated, and as set forth in the *CEQA Guidelines*, related projects consist of, “closely related past, present, and reasonably foreseeable probable future projects that would likely result in similar impacts and are located in the same geographic area.”³⁸ An area of influence, defined by an approximate 1.5-mile radius from the project site, was utilized in order to capture specific locations of other approved and pending projects.³⁹ Based on coordination with planning staff at the City of South Gate, an area projects list was created.⁴⁰ However, a 0.25-mile radius has been used within this EIR for cumulative impacts regarding air quality.⁴¹ Specific projects proposed or currently under development were identified by the City of Los Angeles. These related projects are listed in **Table 2-1** and locations are provided on **Figure 2.6, Cumulative Projects Location Map**.

**TABLE 2-1
LIST OF RELATED PROJECTS**

No.	Project Type	Location	Intensity	Units
1	Billiards	8680 Atlantic Ave.	15,930	s.f.
2	Elementary school	SW Corner - Firestone Blvd. / Kauffman Ave.	950	students
3	Shopping center	NWC - Firestone Blvd. / Atlantic Ave.	600,000	s.f.
4	Shopping center	SWC - Atlantic Ave. / Tweedy Blvd.	45,960	s.f.
5	Shopping center	7230 Firestone Blvd.	10,529	s.f.
6	Construction recycling facility	9309 Rayo Ave.	--	--

SOURCE: KOA. *Traffic Study for Los Angeles Unified School District South Region High School No. 9*, South Gate, CA. July 2, 2008. p. 21.

It is noted that cumulative impacts analyzed in this EIR (impacts from related projects in conjunction with the proposed project) would likely represent a “worst-case” scenario for the following reasons:

- Not all of the related projects will be approved and/or built. Further, it is also likely that several of the related projects will not be constructed at the same time as the proposed project or opened until after the proposed project has been built and occupied.
- Impact projections for related projects would likely be, or have been, subject to unspecified mitigation measures, which would reduce potential impacts.
- Many related projects are expressed in terms of gross square footage or are conceptual plans such as master plans that assume complete development; in reality, such projects may be smaller (for example, the net new development) because of the demolition or removal of existing land uses resulting from the development of the related project.

³⁸ *Ibid.*, §15355.

³⁹ KOA. *Traffic Study for Los Angeles Unified School District South Region High School No. 9*, South Gate, CA, July 2, 2008.

⁴⁰ *Ibid.*

⁴¹ LAUSD, Conversation with Gwenn Godek (LAUSD) and Cynthia Wren (ESA). Various Dates.



SOURCE: Globexplorer, 2007; ESA, 2008.

LAUSD #9 . 206227.02
Figure 2.6
 Cumulative Map

CHAPTER 3.0

Environmental Analysis

3.1 Environmental Issues Addressed

An Initial Study and NOP was prepared for the proposed project in April 2008 (refer to Appendix A of the ~~DEIR 2008~~ of this August 2009 FEIR). Based on the findings, LAUSD determined that an EIR would be required for the proposed project. A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the December 2008 DEIR. The December 2008 DEIR and NOA were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from December 5, 2008 to January 19, 2009). The May 2009 Recirculated DEIR was distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from May 28, 2009 to July 13, 2009), to notify the public that the inclusion of playfields proposed south of the main campus would not result in additional impacts as compared to the project analyzed in the December 2008 DEIR. Environmental issue areas are listed by the level of significance of their impacts in **Table 3-1** below.

**TABLE 3-1
SUMMARY OF ENVIRONMENTAL IMPACTS IDENTIFIED IN THE INITIAL STUDY**

No Impact Less Impact	Than Significant Impact	Potentially Significant Impact
Agricultural Resources	Biological Resources	Aesthetic
Mineral Resources	Cultural Resources	Air Quality
Population and Housing	Hydrology and Water Quality	Geology and Soils
Recreation and Parks	Land Use and Planning	Hazards and Hazardous Materials
	Utilities and Service Systems	Noise
		Pedestrian Safety
		Public Services
		Transportation and Traffic

LAUSD used the Initial Study Checklist, as well as agency and public input received during the NOP comment period and the public scoping meeting, and comments received on the December 2008 DEIR, to determine the scope of the evaluation for the May 2009 Revised DEIR. Based on the findings made during the Initial Study and NOP period, LAUSD analyzed the environmental issues listed below along with their corresponding subchapter:

- 3A – Aesthetics
- 3B – Air Quality

- 3C – Geology and Soils
- 3D – Hazards and Hazardous Materials
- 3E – Noise
- 3F – Pedestrian Safety
- 3G – Public Services
- 3H – Transportation and Traffic

Chapters 3A through 3H provide a detailed discussion of the environmental setting, applicable project design features, impacts associated with the proposed project, cumulative impacts, and mitigation measures designed to reduce significant impacts. Where impacts cannot be reduced to a less than significant level, LAUSD shall consider adopting a Statement of Overriding Considerations.

3.2 Organization of Environmental Analysis

To assist the reader in comparing information about the various environmental issues, each chapter contains the following information.

- Introduction
- Existing Environmental Setting
- Applicable Regulations
- Impacts and Mitigation
 - Methodology
 - Criteria for Determining Significance
 - Project Impacts
 - Mitigation Measures
 - Residual Impacts
 - Cumulative Impacts
 - Mitigation Measures
 - Residual Impacts

3.3 Terminology Used in This Analysis

For each impact identified in the EIR, a statement of the level of significance of the impact is provided. Impacts are categorized in the following categories:

- A designation of *no impact* is given when no adverse changes in the environment are expected.
- A *less than significant impact* would cause no substantial adverse change in the environment.
- A *potentially significant (but mitigable) impact* would have a substantial adverse effect on the environment but could be reduced to a less than significant level with incorporation of mitigation measure(s).
- A *significant and unavoidable impact* would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less than significant level.

- A *residual impact*, as used throughout this EIR, refers to the level of remaining impact, if any, following implementation of all feasible mitigation measures.

SECTION 3A

Aesthetics

3A.1 Introduction

This section discusses the potential aesthetic impacts associated with shade and shadows cast upon residential receptors located in proximity to the proposed project site that would be created by the proposed project. Views, scenic resources, visual character, shading, and nighttime illumination issues are related elements in the visual environment. Impacts related to views, scenic resources, and nighttime illumination were found to be less than significant in the Initial Study (see Appendix A of the DEIR 2008 of this August 2009 FEIR). **Potential impacts to shade and shadow were included for additional analysis (refer to Appendix B).** The Initial Study analysis and conclusion applies to the Recirculated DEIR as no new nighttime lighting would be considered for the new playfields proposed on the southern portion of the campus. Therefore, this chapter only discusses the potential aesthetic impacts associated with shade and shadows.

Shade and Shadow Fundamentals

The analysis of shade and shadow focuses on the effects of shadows cast by proposed buildings and structures on adjacent land uses. Shadows are dependent on several factors, including the local topography, height and bulk of the building or structural elements, sensitivity of adjacent land uses, season, and duration of shadow projection.

Depending on the position of the sun relative to the earth's rotation, shadows cast by a structure are projected east or west of true north according to the time of day and the season. The City of South Gate is at 33 degrees latitude, so all shadows are measured at this degree latitude. Because shadows are only cast in a west to north to east direction, only uses in those directions from a structure are subject to shadows. During the summer solstice (mid June), shadows are shorter than on any other day of the year, whereas shadows are the longest on winter solstice (mid December). Shadows would fall in between these levels on all other days.¹

¹ At 9:00 AM on the winter solstice, shadows project at 45 degrees west of true north. As time approaches noon, shadows both move closer to true north and also shorten in length. After the noon hour, shadows begin to move east and elongate until 3:00 PM, at which time they project at 45 degrees east of true north. Summer shadows move, shorten and then lengthen in the same way throughout the day, except that they project further southward (i.e., 85 degrees from true north during the summer solstice) and reach maximum lengths shorter than those of winter shadows.

Sensitive Receptors

The effect of shadows on land uses may be positive, including cooling effects during warm weather. They may also be negative, such as the loss of natural light necessary for solar energy purposes or the loss of warming influences during cool weather. Facilities and operations sensitive to shadows include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses (e.g., schools, convalescent homes); commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; plant nurseries; and solar collectors. These uses are considered sensitive, because sunlight is important to allow function, physical comfort, or commerce. The relative effects of shading from structures are site-specific.

3A.2 Existing Environmental Setting

Surrounding Area Characteristics

The area surrounding the project site is characterized by residential, manufacturing, and mixed-use commercial and industrial land uses. The proposed project site is bound by Wood Avenue to the north, beyond which are residential land uses; Tweedy Boulevard to the south, followed by vacant land and commercial/light industrial land uses; commercial land uses to the west; and the Los Angeles River to the east, followed by I-710. Union Pacific railroad tracks (Spur No. 810961T) are located to the northeast. The undeveloped land on the project site does provide some open space in an otherwise heavily developed area. However, the value of the undeveloped area as an aesthetic feature is limited due to the site's isolation behind existing development on Atlantic Avenue. As the surrounding topography is relatively flat, with the exception of the Los Angeles River, views from adjacent residential development to the interior portions of the proposed school campus are limited.

Existing Site Characteristics

The site has an abandoned appearance and is primarily vacant, with the exception of one warehouse and four modular storage buildings of various dimensions. The site contains no unique, natural qualities or other features considered an aesthetic resource. The proposed project site consists entirely of land uses designated for manufacturing purposes. Areas of sparse vegetation are scattered throughout the site.

Sensitive Receptors

The proposed project's one- and two-story structures would be located in close proximity to residential structures that border the site to the north. The placement of the proposed structures and their distance to sensitive uses may result in new shading and shadows to be cast on surrounding residential properties. Identified sensitive receptors to the project site include single- and multi-family residential homes located directly adjacent to, and north of, the project site. In addition, sensitive receptors also include the single-family residential homes located to the south of project site, beyond the currently vacant land designated for manufacturing land uses.

However, due to the fact that shadows created by the proposed project would not extend far enough to the south or east to affect these single-family residences, this analysis will focus solely on the affects of shading on the multi-family residences directly north of the site.

3A.3 Applicable Regulations

City of South Gate General Plan. California state law requires that every city and county prepare and adopt a comprehensive, long-range plan to serve as a guide for the physical development of that jurisdiction. The City of South Gate General Plan (General Plan) consists of an integrated set of goals, policies, and implementation measures that focuses on those issues of the greatest concern to the community.² The General Plan is a comprehensive document with seven elements, one of which includes policies that is applicable to aesthetics impacts related to shade and shadows.

Community Development Element. This element is concerned with the physical development characteristics of the City and the overall urban design framework. For issues regarding aesthetics, the following goal and policy in the *Community Development Element* are applicable:

Goal 1: Preserve the existing housing stock in the City to support the preservation of the existing low-density residential neighborhoods.

Policy 1.4: Insure that incompatible land uses adjacent to residential areas provide adequate buffers to mitigation any negative impacts such as noise, light pollution, and traffic.

City of South Gate Municipal Code. The City of South Gate implements its General Plan through Title 11, Zoning, of its Municipal Code. The City's zoning ordinance includes numerous guidelines that affect the final appearance of development within the City. For example, the ordinance addresses the general character of development by limiting the permitted uses and addresses the massing of buildings on a project site by establishing regulations for building height, density, and space between buildings. The ordinance also addresses other design considerations including such items as signage, and lighting.

Section 1 1.41.080 of the City's Zoning Ordinance establishes procedures for Site Plan and Design Review for construction of buildings within parcels of land fifteen thousand square feet or larger or where two or more parcels are proposed to be consolidated for the development of a single project. Under these provisions, all site plans would be reviewed for consistency with the project features as described in this EIR.

² Currently, the City of South Gate is in the process of updating their General Plan: website: <http://www.sogate.org/index.cfm/fuseaction/Detail/CID/101/NavID/60/>, accessed November 26, 2008.

3A.4 Impacts and Mitigation Measures

Methodology

Shadows are generally calculated using three factors: time, geographic location, and object dimension. In general, shadow analyses are conducted using a 3D modeling program (similar to AutoCAD) that creates simulated light and shade figures based on geographic location and object dimension for specific points in time. In general, shadow effects are analyzed for representative times of day (9 AM, 12 PM [noon], and 3 PM) during the four seasons of the year:

- December, on the winter solstice, when the sun is at its lowest and shadows are at their longest;
- March, at the spring equinox, when shadows are midway through a period of shortening;
- September, at the fall equinox, when shadows are midway through a period of lengthening; and
- June, on the summer solstice, when the sun is at its highest and shadows are at their shortest.

Shadows on any other day of the year would be within the range of shadows presented during the seasons and times of day described above.

Criteria for Determining Significance

The criteria used to determine the significance of an impact related to light and glare are based on Appendix G of the *CEQA Guidelines*, and LAUSD's *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites (Draft Protocol)*.³ The proposed project may result in a significant shade and shadow impact if it would:

- Shade shadow-sensitive uses by project-related structures for more than three hours between the hours of 9 AM to 3 PM, Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 am to 5 pm, Pacific Daylight Time (between early April and late October).
- Result in a cumulatively considerable impact with respect to shade and shadow.

Under the District's Draft Protocol, shadow impacts on the winter solstice are assumed to represent the worst-case scenario, because shadows are the longest of the year. As such, the Draft Protocol states that if there is a shadow impact on the winter solstice, then shadow diagrams will be prepared for the spring/fall equinox (March 24/September 24), and summer solstice (June 22) between 9 AM and 5 PM. In the case of South Region High School No. 9, only the shadow diagrams for the winter solstice are necessary for this analysis.

³ LAUSD, OEHS, *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites*, February 28, 2007.

Project Impacts

Impacts associated with shade and shadows are generally concerned with the effects of shadows cast by existing or proposed structures on adjacent land uses. The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were potentially significant (see Appendix A).

Impact 3A.1: Shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 AM to 3 AM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9 AM to 5 AM Pacific Daylight Time (between early April and late October).

Less Than Significant Impact. The existing site is primarily vacant, with the exception of one warehouse and four modular storage buildings, which are planned for demolition in conjunction with the proposed project. LAUSD is proposing to construct a high school on the northern portion of the site, which would include 53 classrooms, a multipurpose room, music and drama hall, a gymnasium, an administration building, athletic fields, and a surface parking lot. The proposed project would include the development of a classroom building that would be approximately 34 feet in height and, thus, may impact residential development to the north. The distance from this classroom building to the nearest sensitive receptor property line (e.g. residential development to the north) is 46 feet 8 inches.

Shadow is dependent on the height and size of the building from which shadow is cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth and the elliptical orbit. The longest shadows are cast during winter months and the shortest shadows are cast during the summer months. The shortest day of the year (i.e., the shortest day of the year and the longest night) is the winter solstice, usually on or about December 21st. As such, in order to simulate the conditions that would occur upon full build-out of the project during the shortest day of the year, shadow diagrams were generated through the use of shadow calculation software (refer to **Appendix B**).

Winter Solstice (December 21)

9 AM

Shadows cast during the winter would be the longest and widely cast of all seasons. By 9 AM some shadow generated by the proposed classroom facility would be cast onto the fence along the property line to the north. However, during this time, no shadow would fall onto the multi-family residential land uses located adjacent to, and north of, the proposed project site. Although no shadow would affect the residences to the north, shadow would be cast onto the ground area located to the north of the proposed classroom facility.

12 PM

By noon (12 PM), shadows generated from the proposed project's structures would be significantly reduced. The proposed buildings would cast some shadow onto the ground area located to the north of the proposed classroom facility. No shadow would fall onto the single- and multi-family residential structures located to the north during this time.

3 PM

Shadows generated by the proposed project's classroom facility during afternoon hours (12 PM to 3 PM and beyond), would lengthen and fall directly northeast. This time period represents the most significant shade and shadow impacts resulting from the proposed project. Shadows cast by the new school buildings would extend past the northern side of the property line and fall onto the residential land uses north of the proposed project site. In addition, shadows would also partially shade the ground area located adjacent to the project site's northern property line, immediately east of Adella Avenue. However, no shadow would fall onto the residential land uses for a duration of three hours or more during this time.

The longest shadow cast under proposed project conditions would occur in the afternoon of the winter solstice (December 21), between the hours of 12 PM to 3 PM. However, as mentioned above, no shadows would fall onto the residential land uses north of the proposed project site for a duration of three hours or more. Subsequently, no shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9 AM to 5 PM Pacific Daylight Time at any time. Therefore, according to the significance criteria outlined in the *Draft Protocol for Shadow Analysis in CEQA Documents for Proposed School Sites*, the shadow emitted from the proposed project during the winter solstice (worst case scenario) would not result in a significant shade/shadow impact. There would be no impacts due to shade and shadow resulting from the proposed project.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

There would be no residual impacts.

Cumulative Impacts

Impact 3A.2: Result in a cumulatively considerable shadow impacts at the project site and immediate area.

Less Than Significant Impact. Because aesthetic impacts affect the project site and immediate area, cumulative impacts would include nearby projects. Related projects in the surrounding area are outlined in Table 2-1 (please refer to Chapter 2.0, *Project Description*). As demonstrated in Figure 2.6 *Related Projects*, there are no related projects adjacent to, or in the vicinity of, the project site that would result in cumulatively considerable shade and shadow impacts when considered in conjunction with the proposed project. As discussed above, the proposed project would not degrade the existing visual character or quality of the project site or surroundings due to impacts resulting from shade and shadow. Therefore, the proposed project would not make a cumulatively considerable contribution to shading impacts. There would be no cumulative impacts resulting from the proposed project, and no mitigation is required.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

There would be no residual cumulative impacts.

SECTION 3B

Air Quality

3B.1 Introduction

This section evaluates the potential impacts on air quality resulting from construction and operation of the proposed project. This evaluation presents the ambient air quality in the area of the proposed project site, provides a summary of applicable regulations, and discusses the methodology utilized for the analysis. The evaluation discusses potential impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy pollutant concentrations, including the type and quantity of emissions generated by construction and operation of the proposed project. This section also considers the impacts of the proposed redevelopment on greenhouse gas (GHG) emissions and global climate change. See Appendix AC for the model outputs.

3B.2 Existing Environmental Setting

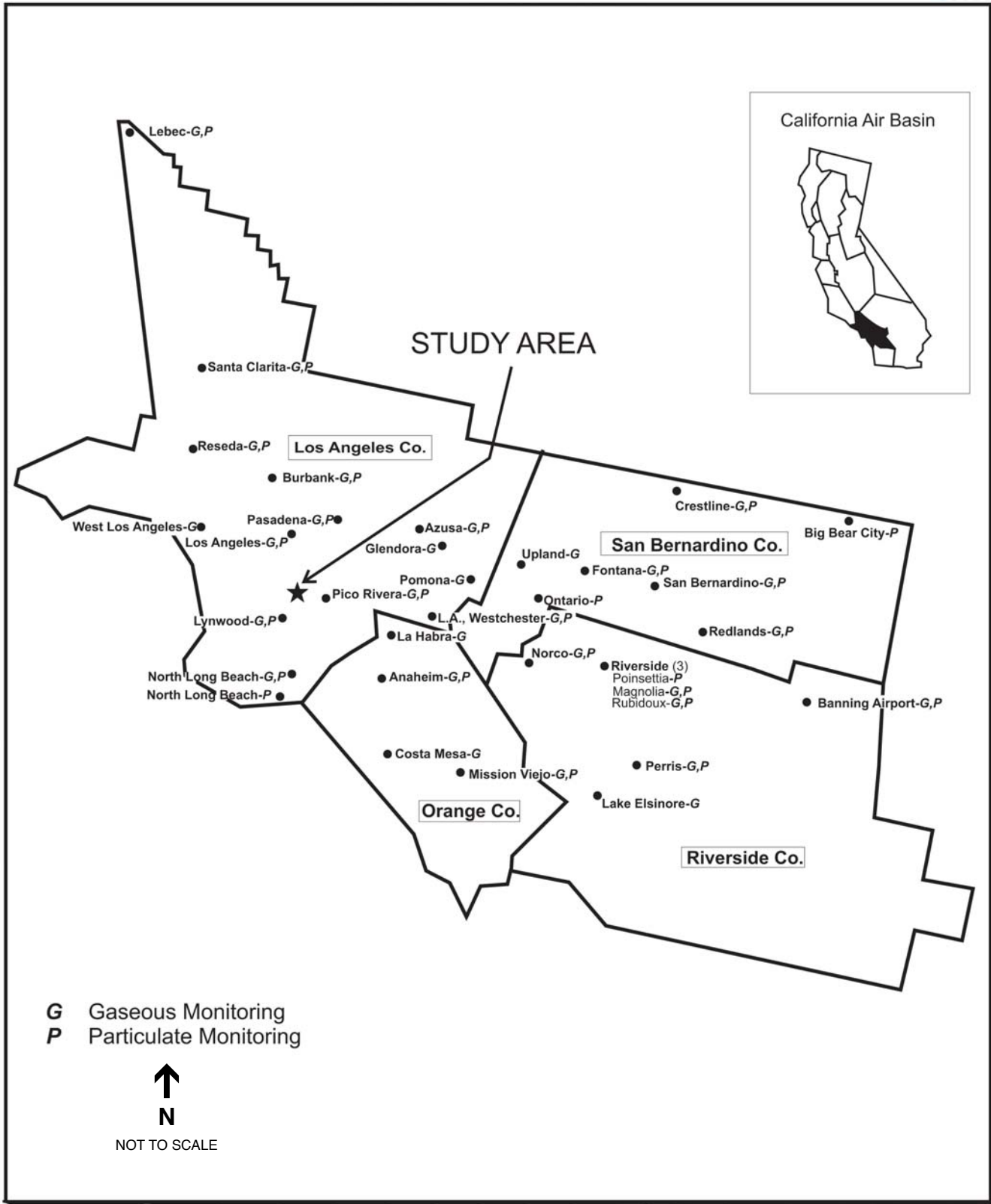
Air quality is affected by both the amount and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

Regional Climate

California is divided into separate air basins, each having distinctive features and related air quality challenges as dispersion of air pollution in the atmosphere is directly related to a region's topographic and meteorological conditions. The project site lies within the South Coast Air Basin (Basin), which incorporates approximately 12,000 square miles within four counties - all of Orange County, most of Los Angeles and Riverside Counties and the western portion of San Bernardino County - including some portions of what was previously known as the Southeast Desert Air Basin (see **Figure 3B-1**, *South Coast Air Basin*).¹ The Basin is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east.² Air quality for the Basin is managed by the SCAQMD. The Basin experiences severe air pollution problems, which are a consequence of the combination of emissions from the nation's second largest urban area and meteorological conditions, which are adverse to the dispersion of those emissions. The combination of low wind speeds and low inversions produces

¹ SCAQMD, *2007 Air Quality Management Plan*, June 1, 2007, p. 1-3.

² *Ibid.*, p. 1-2.



SOURCE: CARB, 2007

LAUSD #9 . 206227.02
Figure 3B.1
 South Coast Air Basin

the greatest concentration of air pollutants. On days without inversions, or on days of winds averaging over 15 miles per hour (mph), smog potential is greatly reduced.³ During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cool marine layer and inhibits the pollutants in the marine layer from dispersing upward. In addition, light winds during the summer further limit ventilation. The Southern California area is also an area with abundant sunshine, which drives the photochemical reactions which form pollutants such as ozone (O₃).⁴

Greenhouse Gas Emissions and Climate Change

GHGs are those compounds in the Earth's atmosphere that play a critical role in determining the Earth's surface temperature. Specifically, these gases allow high-frequency solar radiation to enter the Earth's atmosphere, but retain the low-frequency energy that is radiated back from the Earth to space, resulting in a warming of the atmosphere. This phenomenon is known as the greenhouse effect. Increased concentrations of GHGs in the Earth's atmosphere are thought to be linked to global climate change, such as rising surface temperatures, melting icebergs and snow pack, rising sea levels, and the increasing frequency and magnitude of severe weather.

GHGs include carbon dioxide (CO₂), methane (CH₄), O₃, water vapor, nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). CO₂ is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. GHGs are the result of natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. According to the California Energy Commission (CEC), emissions from fossil fuel consumption represent approximately 69 percent of all GHG emissions and transportation creates 31 percent of all GHG emissions in the United States.⁵

Even though predictive capabilities are advancing, there remain significant scientific uncertainties. For example, in predictions of local effects of climate change, occurrence of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system, the uncertainty in its description and in the prediction of changes may never be completely eliminated. Because of these uncertainties, there continues to be significant debate over the extent to which increased concentrations of GHGs have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

³ SCAQMD, *CEQA Air Quality Handbook*, April 1993, p. A8-1.

⁴ *Ibid*, p. 2-3.

⁵ CEC, <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>

Local Climate

Temperature

The closest climate monitoring station to the proposed project site is located at the Downey Fire Department, approximately four miles west of the site.⁶ Data from this climate monitoring station were used to characterize the study area climate conditions. The average summer (August) high temperature is 89.2 degrees Fahrenheit (°F) and the average summer (June) low temperature is 67.8 °F. The average winter (December) high temperature is 62.6 °F and the average winter (January) low temperature is 58.4 °F.⁷

Wind

The average wind speed for the Los Angeles region is the lowest of the nation's ten largest urban areas. In addition, the summertime maximum mixing height (an index of how well pollutants can be dispersed vertically in the atmosphere) in Southern California averages the lowest in the United States. Wind patterns in the proposed project vicinity trend in a west-southwesterly direction and average wind speeds vary from a low of 0.7 mph during the winter months to 2.3 mph during the spring and summer months.⁸ On days without inversions, or on days of winds averaging over 15 miles mph, smog potential is greatly reduced.⁹

Precipitation

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all rain falls from November through April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains. According to the Western Regional Climate Center, the average annual rainfall is 22.18 inches near the proposed project site.¹⁰

Existing Air Quality

Sources of air emissions can be categorized as either stationary or mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. The City of South Gate primarily consists of single-family residential neighborhoods that surround arterial commercial development, such as the development occurring along Atlantic Avenue which contains a mix of commercial and nearby industrial development.

The project site is primarily vacant, undeveloped land. The only source of emissions would be fugitive dust resulting from periodic heavy wind incidents. In the vicinity, the primary source of air pollutants are from vehicle motor exhaust (e.g., motor vehicles and trucks that traverse the local roadway network), classified as a mobile source. Additional emission sources in the vicinity

⁶ Western Regional Climate Center, *Comparative Data for the Western States*, website <http://www.wrcc.dri.edu/summary/Climsmsca.html>, accessed May 20, 2008.

⁷ *Ibid.*

⁸ *Ibid.*

⁹ SCAQMD, *CEQA Air Quality Handbook*, April 1993, p. A8-1.

¹⁰ *Ibid.*

include emissions from residential, commercial, and industrial land uses (e.g., indirect emissions from energy production, landscaping and lawn care equipment, water heaters, maintenance operations, and painting activities).

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. The US EPA utilizes six “criteria pollutants” as indicators of air quality and has established for each of them a maximum concentration level or standard (i.e., National Ambient Air Quality Standards, or NAAQS). These six criteria pollutants are ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter less than 10 and 2.5 microns (PM₁₀ and PM_{2.5}), and lead. The California Air Resource Board (CARB) administers California Ambient Air Quality Standards (CAAQS) for air pollutants designated in the California Clean Air Act (CAA). CARB has established standards for most of the criteria pollutants, as well as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The ambient air quality standards are intended to protect the public health and welfare, and they incorporate an adequate margin of safety. Reactive Organic Compounds (ROC), also referred to as Volatile Organic Compounds (VOC), are criteria pollutant precursors that form secondary criteria pollutants through chemical and photochemical reactions in the atmosphere. Additional discussion of applicable regulations is provided in section 3B.3 *Applicable Regulations*.

SCAQMD maintains a network of air quality monitoring stations located throughout the Basin and has divided the Basin into air quality monitoring areas. For the project area, the nearest monitoring station is the Lynwood Station, located at 11220 Long Beach Boulevard in Lynwood (approximately 1.9 miles southwest of the project site). This station monitors O₃, CO, NO₂, PM₁₀ and PM_{2.5}. Data for O₃ measurements were obtained from the second closest station to the project area, which is the North Main Station located at 1603 N. Main Street in Los Angeles (approximately 8.9 miles from the project site). In summary, CO, NO₂, PM₁₀, and PM_{2.5} data were obtained from the Lynwood station and O₃ data were obtained from the North Main station. The data for the years 2005 through 2007 were obtained from these monitoring stations, and are summarized in **Table 3B.1**. Table 3B.1 also compares the pollutants to the state and national ambient air quality standards. In addition to summarizing physical properties and associated health effects, the attainment status and a short discussion of available ambient monitoring data is provided below.

O₃ – The Basin is in non-attainment for both the federal and state O₃ standards.¹¹ O₃ is a secondary pollutant produced through a series of photochemical reactions involving ROC and nitrogen oxides (NO_x). O₃ creation requires ROC and NO_x to be available for approximately three hours in a stable atmosphere with strong sunlight. O₃ is a regional air pollutant because it is not directly emitted by sources, but is formed downwind of sources generating ROC and NO_x emissions.

O₃ can cause eye and respiratory irritation, reduction of resistance to lung infection and possible aggravation of pulmonary conditions in persons with lung disease. O₃ is also damaging

¹¹ SCAQMD, *2007 Air Quality Management Plan*, July 1, 2007, p. 2-8.

**TABLE 3B-1
AIR QUALITY DATA SUMMARY (2005-2007) FOR THE PROJECT SITE AND ITS VICINITY**

Pollutant	Standard ^a	Monitoring Data by Year		
		2005	2006	2007
O₃				
Highest 1 Hour Average (ppm) ^b		0.11	0.09	0.10
Days over State Standard	0.09	1	0	1
Highest 8 Hour Average (ppm) ^b		0.08	0.07	0.08
Days over State Standard	0.07	2	0	2
Days over National Standard	0.075	1	0	1
CO				
Highest 1 Hour Average (ppm) ^b		7.4	8.4	7.8
Days over State Standard	20	0	0	0
Days over National Standard	35	0	0	0
NO₂				
Highest 1 Hour Average (ppm) ^b		0.107	0.137	0.099
Days over State Standard	0.18	0	0	0
Annual Average		0.031	0.031	0.029
PM₁₀**				
Highest 24 Hour Average – State/National (µg/m ³) ^{b,d}		69/70	58/59	77/78
Estimated days over State Standard ^c	50	17.8	18.1	31
Estimated days over National Standard ^c	150	0	0	0
State Annual Average ^d	20	29.2	30.1	33
National Annual Average ^d	--	29.6	30.1	33.3
PM_{2.5}				
Highest 24 Hour Average –National (µg/m ³) ^b		54.6	55	48.9
Estimated days over National Standard ^c	65/35	0 ^e	0 ^e	0
State Annual Average ^d	12	17.8**	16.0**	NA
National Annual Average ^d	15	17.5	16.7	16.0
SO₂				
Highest 24 Hour Average –(µg/m ³) ^b		0.010	0.006	0.005
Estimated days over State Standard ^c		0	0	0
Estimated days over National Standard		0	0	0
Annual Average ^d	0.03	0.002	0.002	0.001

** = Data gathered from the North Main Station, located at 1630 North Main Street, Los Angeles CA 90012. All other data collected from the Lynwood Station, located at 11220 Long Beach Boulevard, Lynwood CA 90262.

^a Generally, state standards are not to be exceeded and federal standards are not to be exceeded more than once per year.

^b ppm = parts per million; µg/m³ = micrograms per cubic meter.

^c PM-10 and PM-2.5 are not measured every day of the year. "Number of samples" refers to the number of days in a given year during which PM-10 and PM-2.5 were measured at the Lynwood monitoring station.

^d State statistics are based on California approved samplers, whereas national statistics are based on samplers using federal reference or equivalent methods.

^e In December 2006, the US EPA lowered the 24-hour PM_{2.5} standard from 65 µg/m³ to 35 µg/m³. Though the current standard is 35µg/m³, the estimated days over the national standard refers to days above the 65 µg/m³ standard.

NA = Not Available.

SOURCE: CARB, 2007e, *Summaries of Air Quality Data, 2005, 2006, 2007*; <http://www.arb.ca.gov/adam>.

to vegetation and untreated rubber. As shown in Table 3B-1, the state one-hour O₃ standard was exceeded one time in 2005 and one time in 2007 at the Lynwood monitoring station.¹² The state eight-hour O₃ standard was exceeded two times in 2005 and two times in 2007 at the Lynwood monitoring station.¹³ Neither the state one-hour O₃ standard, nor the state eight-hour O₃ standards were exceeded in the year 2006 at the Lynwood monitoring station.¹⁴ Although no O₃ standards were exceeded during 2006, the consistency in the number of exceedences for each standard in the years 2005 and 2007 indicates that the O₃ levels in the Basin have not improved significantly.

CO – The Basin is in attainment for both federal and state CO standards.¹⁵ CO is a non-reactive pollutant that is a product of incomplete combustion. Ambient CO concentrations usually follow the spatial and temporal distributions of vehicular traffic and are also influenced by meteorological factors such as wind speed and atmospheric mixing. Under inversion conditions, CO concentrations may be distributed more uniformly over an area, distant from vehicular sources. As shown in Table 3B-1, the one-hour average CO standard was not exceeded at the Lynwood monitoring station in the three-year period from 2005 to 2007.

NO₂ – NO₂ is primarily formed when NO reacts with atmospheric oxygen. NO₂ gives the air the “whiskey brown” color associated with smog. The Basin is in attainment for the state NO₂ standard. Since NO_x emissions contribute to O₃ generation, NO_x emissions are regulated through the O₃ attainment plans. As shown in Table 3B-1, the state one-hour standard was not exceeded at the Lynwood monitoring station in the three-year period from 2005 to 2007.

SO₂ – The Basin is in attainment for the federal and state SO₂ standards.¹⁶ SO₂ is primarily produced by the burning of high sulfur coal in industrial operations and power plants. In some parts of the state, elevated levels can also be due to natural causes, such as wind-blown dust and sea salt spray. Suspended sulfates contribute to overall particulate concentrations in ambient air which, if high enough, are suspected to be a cause of premature death in individuals with pre-existing respiratory disease. The 24-hour SO₂ standard was not exceeded at the North Main monitoring station in the three-year period from 2005 to 2007.

PM₁₀ – The Basin is in non-attainment for the federal and state PM₁₀ standard.¹⁷ PM₁₀ is particulate matter that is smaller than 10 microns in diameter. PM₁₀ can be inhaled deep into the lungs and cause adverse health effects. PM₁₀ in the atmosphere results from many kinds of dust- and fume-producing industrial and agricultural operations, fuel combustion, and atmospheric photochemical reactions. Some sources of particulate matter, such as demolition and construction activities, are more local in nature, while others such as vehicular traffic, have a more regional effect.

Particulate matter contributes to pollution through fugitive dust and exhaust emissions. Fugitive dust is produced from activities that disturb soil such as grading, digging, or just driving on an

¹² CARB, *Summaries of Air Quality Data*, 2005, 2006, 2007. website <http://www.arb.ca.gov/adam>, accessed June 22, 2008.

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ SCAQMD, *2007 Air Quality Management Plan*, July 1, 2007, p. 2-15.

¹⁶ *Ibid.*, p. 2-18.

¹⁷ *Ibid.*, p. 2-11.

unpaved road. Particulate matter from exhaust gases is produced from incomplete combustion, resulting in soot formation. Both forms of particulate matter are accounted for in calculations performed in this analysis. As shown in Table 3B-1, the one-hour PM_{10} standard was exceeded between 17 and 31 days at the North Main monitoring station in the three-year period from 2005 to 2007.^{18,19} The increase in the number of exceedences for the one-hour PM_{10} standard between the years of 2005 and 2007 indicates that the amount of particulate matter in the Basin is increasing. The annual geometric mean was exceeded in 2001, 2002, and 2004 at the Main Street monitoring station.

$PM_{2.5}$ – The Basin is classified as a non-attainment for the federal and state $PM_{2.5}$ standard. It refers to particles that are 2.5 microns or less. $PM_{2.5}$ is mostly derived from combustion sources, such as automobiles, trucks, and other vehicle exhaust, as well as from stationary combustion sources. The particles are either directly emitted or are formed in the atmosphere from the combustion of gases, such as NO_x and SO_x combining with ammonia. Components from material in the earth's crust, such as dust, are also present, with the amount varying in different locations. As shown in Table 3B-1, the state annual arithmetic standard was exceeded in 2005 and 2006 at the Lynwood monitoring station, and data was unavailable for the year 2007. However, the decrease in the state annual arithmetic standard between 2006 and 2007 may indicate that the amount of particulate matter in the Basin has been decreasing in recent years.

ROC – There is currently no ambient air quality standard for ROC. ROC are any reactive compounds of carbon, excluding methane, carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, ammonium carbonate, and other exempt compounds. ROC are a precursor of ozone and as such is regulated under the SCAQMD ozone attainment plan. However, since there is no ambient air quality standard for ROC, exceedences of such a standard are not possible. In this analysis, ROC includes VOCs.

Lead – Lead concentrations historically exceed the state and federal air quality standards by a wide margin but have not exceeded the standards at any regular monitoring station since 1982. Though special monitoring sites immediately downwind of lead sources recorded localized violations of the state standard in 1994, no violations were recorded at these stations in 2005. Consequently, the Basin is designated as an attainment area for lead. Airborne ambient lead is no longer a health issue in the Basin, and the SCAQMD does not require an emissions analysis unless the project is typically associated with lead emissions. The proposed project would not result in lead emissions and, and such, lead emissions are not quantified in this analysis.

Sulfates – The entire state of California is designated as attainment for sulfates. Sulfates are monitored at a handful of stations in the Basin and the last recorded exceedance was in 2001. In California, emissions of sulfur compounds primarily occur from the combustion of petroleum-derived fuels (for example, gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO_2 during the combustion process and subsequently converted to sulfate compounds in the

¹⁸ SCAQMD, *Air Quality Data Summaries*, 2005-2007.

¹⁹ The Lynwood monitoring station is not equipped to test for PM_{10} pollutants. Therefore, the North Main Street monitoring station, located approximately 8.9 miles north, was used to calculate air quality data for PM_{10} .

atmosphere. As SO₂ is a precursor to sulfates, the SCAQMD recommends analyzing SO₂ as an indicator of sulfates. As such, sulfate emissions are not quantified in this analysis.

TACs – The public’s exposure to various toxic air contaminants (TACs) is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health. The California Health and Safety Code defines a TAC as “an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health.” Any substance that is listed as a hazardous air pollutant (HAP) pursuant to subsection (b) of Section 112 of the federal act (42 USC Sec. 7412[b]) is a TAC. Under State law, the California Environmental Protection Agency, acting through the CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or to an increase in serious illness, or that may pose a present or potential hazard to human health.

Sensitive Receptors

Some people are especially sensitive to air pollution emissions and should be given special consideration when evaluating air quality impacts from projects. The SCAQMD defines typical sensitive receptors as residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Land uses such as schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. The reasons for heightened sensitivity to air pollution emissions may include preexisting health problems, proximity to the emissions source, and duration of exposure to air pollutants.

As shown on **Figure 3B.2**, the nearest sensitive receptors to the proposed project include single-family and multi-family residences surrounding the project site, as well as the schools located near the project area. Sensitive receptors specific to the project area include:

- Residential land uses adjacent to the north of the project site, along Wood Avenue;
- Residential land uses adjacent to the south of the project site, along of Aldrich Avenue;
- Lugo Elementary School, located at 4345 Pendleton Ave in Lynwood;
- Bryson Elementary School, located at 4470 Missouri Avenue in South Gate; and
- Tweedy Elementary School, located at 9724 Pinehurst Avenue in South Gate.

Existing Health Risk in the Surrounding Area

Both SCAQMD and CARB have monitoring networks in the Basin that measure ambient concentrations of certain TACs that are associated with important health-related effects and are present in appreciable concentrations in the area. SCAQMD uses this information to determine



SOURCE: Globexplorer, 2007; ESA, 2008.

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Figure 3B.2

Existing Sensitive Receptors Area

risks for a particular area. Results of the Multiple Air Toxics Exposure Study (MATES III) indicate that the Basin cancer risk is approximately 1,200-in-one-million.²⁰ This risk refers to the expected number of additional cancers in a population of one million individuals that are exposed over a 70-year lifetime. Using the MATES III methodology, about 94 percent of the risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations.

The MATES III results indicate that diesel exhaust is the major contributor to air toxics risk, accounting on average for about 84 percent of the total risk in the Basin. A network of ten fixed sites was used to monitor TACs once every three days for two years. According to the SCAQMD's MATES III study the monitoring site nearest to the project area is the Compton site, and data shows a simulated air toxic risk area of approximately 1,200 in-one million.²¹ This is largely due to diesel particulates emitted from heavy-duty trucks traveling along the I-105 and I-710 freeways, which are within four miles of the project site.

3B.3 Applicable Regulations

Air pollutants and emissions are regulated at the national, state, and air basin level. For each of these levels, a specific and separate agency is designated to exercise differing degrees of control.

Federal and State

Federal Clean Air Act

The federal CAA is a comprehensive federal law that regulates air emissions from area, stationary, and mobile sources. This law authorizes US EPA to establish NAAQS to protect public health and the environment. The CAA was adopted in 1963, and has since undergone five major amendments. The latest major amendment of the federal CAA was completed in 1990, with prior major amendments occurring in 1965, 1967, 1970, and 1977. Basic elements of the federal CAA applicable to the proposed project or apply in general include provisions for attainment and maintenance of the NAAQS for major air pollutants (Title I), motor vehicle emissions and fuel standards (Title II), HAP standards (Title III), and stratospheric ozone protection (Title VI).

Ambient air quality standards are intended to protect the public health and welfare, and they incorporate an adequate margin of safety. The NAAQS were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. The NAAQS establishes a threshold maximum concentration level for which an adverse effect on human health may occur for each criteria pollutant, as shown in **Table 3B-2**.

²⁰ SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin (MATES-III)*, September 2008, website: <http://www.aqmd.gov/prdas/matesIII/MATESIIIFinalReportSept2008.html>, accessed November 3, 2008. p. ES-2.

²¹ *Ibid.*, p. 2-19.

**TABLE 3B-2
STATE AND NATIONAL CRITERIA AIR POLLUTANT STANDARDS, EFFECTS, AND SOURCES**

Pollutant	Averaging Time	California Standard ^b	Federal Primary Standard ^{c,d}	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
O ₃ ^e	1 hour	0.09 ppm	0.12 ppm	High concentrations can directly affect lungs, causing irritation. Long-term exposure may damage to lung tissue.	Primarily gasoline-powered motor vehicles.
	8 hours	0.07 ppm	0.075 ppm		
CO	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiate. CO interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
NO ₂	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Increases susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO ₂ is as a precursor to the formation of O ₃ .	Gasoline-powered motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm ^f	—		
SO ₂	Annual Arithmetic Mean	—	0.03 ppm	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	—		
	24 hours	0.04 ppm	0.14 ppm		
PM ₁₀	24 hours	50 µg/m ³	150 µg/m ³	Increases respiratory disease, irritates eyes and respiratory tract. Absorbs sunlight, reducing amount of solar energy reaching the earth. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Arithmetic Mean	20 µg/m ³	50 µg/m ³		
PM _{2.5}	24 hours	—	35 µg/m ³	Increases respiratory disease, lung damage, cancer, premature death, and reduced visibility.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning. Also formed from reaction of other pollutants (acid rain, NO _x , SO _x , organics).
	Annual Arithmetic Mean	12 µg/m ³	15 µg/m ³		
Lead	Monthly	1.5 µg/m ³	—	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurologic dysfunction (in severe cases).	Lead smelters, battery manufacturing & recycling facilities.
	Quarterly	—	1.5 µg/m ³		
Sulfates	24 hours	25 µg/m ³	—	Decrease in ventilatory functions, aggravation of asthmatic symptoms, and aggravation of cardio-pulmonary disease.	Coal or oil burning power plants and industries, refineries, diesel engines.
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	No National Standard	Reduces visibility; health effect are the same as those assumed for particulate matter.	See PM _{2.5} .
Hydrogen Sulfide	1 hour	0.03 ppm	No National Standard	Although mainly affecting humans as a nuisance odor, high levels may cause headache or breathing difficulties.	Geothermal power plants, petroleum production and refining processes, and wastewater treatment plant and sewer off-gases.
Vinyl Chloride	24 hour	0.01 ppm	No National Standard	CARB identified TAC with no threshold or exposure for adverse health effects determined.	Industrial processes.

NOTES: ppm = parts per million and µg/m³ = micrograms per cubic meter.

^a Ambient air quality standards are set at levels that provide a reasonable margin of safety and protect the health of the most sensitive individual in the population.

^b CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^c NAAQS (other than O₃, PM, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year.

^d This table includes updated PM₁₀, PM_{2.5}, and O₃ standard that were adopted in September 2006.

^e O₃ is formed when NO₂ and ROG react in the presence of sunlight. New 8-hour standard adopted by USEPA May 2008. There are no air quality standards for ROG, however ROG are recognized as pollutants of concern as they are a precursor to the formation of O₃.

^f The NO₂ standard was amended on February 22, 2007, to lower the 1-hr standard to 0.18 ppm and establish a new annual standard of 0.30 ppm.

SOURCE: CARB, Ambient Air Quality Standards, 2008.

California Clean Air Act

In 1988, the state legislature passed the California CAA, which established California's air quality goals, planning mechanisms, regulatory strategies, and standards of progress for the first time. The California CAA provides the state with a comprehensive framework for air quality planning regulation and establishes state air quality standards. The CAAQS, also shown in Table 3.4-2, incorporate additional standards for most of the criteria pollutants, and has set standards for other pollutants recognized by the state such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. In general, the state standards are more health protective than the federal standards.

Attainment Status

As provided by both the federal and California CAA, US EPA has classified air basins or portions thereof as either "attainment" or "nonattainment" for each criteria air pollutant based on whether or not the standards have been achieved. Due to the differences in federal and California standards, there can be differing outcomes as far as attainment status. **Table 3B-3** summarizes the current attainment status of Los Angeles County with respect to both federal and state ambient air quality standards. As shown, air quality is in non-attainment of the NAAQS and CAAQS for O₃, PM_{2.5}, and PM₁₀.

**TABLE 3B-3
LOS ANGELES COUNTY ATTAINMENT STATUS**

Pollutant	National Status	California Status
O ₃ (1-hour standard)	No Federal Standard ^a	Nonattainment
O ₃ (8-hour standard)	Severe Nonattainment	Nonattainment
CO	Unclassified/Attainment	Attainment
SO ₂	Unclassified	Attainment
NO ₂	Unclassified/Attainment	Attainment
PM ₁₀ (24-hour)	Serious Nonattainment	Nonattainment
PM ₁₀ (annual)	No Federal Standard ^b	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
Lead	Attainment	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-Reducing Particles	No Federal Standard	Unclassified
Vinyl Chloride	No Federal Standard	Unclassified

^a Federal One Hour O₃ NAAQS was revoked on June 15, 2005.

^b The NAAQS for annual PM₁₀ was revoked on September 21, 2006.

SOURCES: CARB, Los Angeles County Attainment Status, 2007b.

State Implementation Plan

The 1977 CAA Amendments require that regional planning and air pollution control agencies prepare a regional Air Quality Plan to outline the measures by which both stationary and mobile

sources of pollutants can be controlled in order to achieve all standards specified in the CAA. For areas that are designated “nonattainment” with respect to a standard, the CAA specifies future dates for achieving compliance with the NAAQS and mandates that states submit and implement a State Implementation Plan (SIP) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. Similarly, the 1988 California CAA also requires development of air quality plans and strategies to meet state air quality standards in areas designated as nonattainment (with the exception of areas designated as nonattainment for the state PM standards). Maintenance plans are required for attainment areas that had previously been designated nonattainment in order to ensure continued attainment of the standards.

Toxic Air Contaminants

Air toxics from stationary sources in California are also regulated under Assembly Bill 2588, the Air Toxics “Hot Spots” Information and Assessment Act of 1987. Regulation of TACs from mobile sources has traditionally been implemented through emissions standards for on-road motor vehicles (imposed on vehicle manufacturers) and through specifications for gasoline and diesel fuel sold in California (imposed on fuel refineries and retailers), rather than through land use decisions, air quality permits, or regulations addressing how motor vehicles are used by the general public.

In August 1998, CARB identified particulate emissions from diesel-fueled engines (diesel particulate matter, or DPM) as TACs. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* (2000). This document provides a plan to reduce diesel particulate emissions, with the goal of reducing emissions and the associated health risks by 75 percent in 2010 and by 85 percent in 2020. The program aims to require the use of state-of-the-art catalyzed diesel particulate filters and ultra low sulfur diesel fuel on diesel-fueled engines.

CARB's In-Use Off-Road Diesel Vehicle Rule and TIER Standards

Implementation of CARB’s clean diesel engine rule (Tier 1) began in 1996. Currently, diesel engines are manufactured to comply with the current Tier 3 standard; however, as the Tier 4 standards become effective, the rule requires new engines to meet the most current standard. CARB requires that existing Tier 1 and 2 engines be replaced with Tier 3 engines beginning in 2010. Tier 1 or Tier 2 certified engines must be replaced with Tier 4 engines starting in 2014 or within 12 years after the installation of the engine, whichever is later.

In July 2007, CARB adopted the In-Use Off-Road Diesel Vehicle Rule, which requires owners of diesel powered off-road mobile equipment (such as scrapers, loaders, and forklifts) to meet stringent emission control requirements. CARB made revisions to the rule in May 2008. The rule requires companies replace and/or repower older equipment; this rule generally applies to diesel powered off-road mobile equipment engines 25 horsepower or larger, used in construction, mining and other activities. The CARB rule allows fleet owners to repower their equipment with a lower emission engine (for NO_x, the emissions rate must be Tier 2 or higher). Other options are provided by the rule, such as replacing a diesel engine with an emission certified gasoline-powered engine.

Greenhouse Gases

In response to growing scientific and political concern with global climate change, California has recently adopted a series of laws to reduce emissions of GHGs to the atmosphere from commercial and private activities within the state. In September 2002, then-Governor Gray Davis signed Assembly Bill (AB 32) 1493, requiring the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. However, setting emission standards on automobiles is solely the responsibility of the US EPA. The federal CAA allows states to set state-specific emission standards on automobiles if they first obtain a waiver from the US EPA. The US EPA denied California’s request for a waiver in December 2007, thereby possibly delaying CARB’s proposed implementation schedule.

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to achieving the following:

- 2000 GHG emission levels by 2010 (a reduction of 11 percent below business as usual);
- 1990 levels by 2020 (25 percent below business as usual); and
- 80 percent below 1990 levels by 2050.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and CEC to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97, enacted in August 2007, provides that, until January 1, 2010, failure to adequately analyze the effects of GHG emissions in an EIR, negative declaration or other CEQA document for certain state-funded transportation and flood control projects does not create a cause of action for violation of CEQA. SB 97 also requires the Office of Planning and Research to develop guidelines for the mitigation of GHG emissions or the effects of GHG emissions by July 1, 2009, and the CARB to adopt those guidelines by January 1, 2010.

On June 19, 2008, the California Office of Planning and Research issued a Technical Advisory entitled *CEQA and Climate Change: Addressing Climate Change Through CEQA Review* (Technical Advisory), which sets forth advisory standards for analyzing project-specific direct, indirect and cumulative impacts on climate change from GHG emissions.²² The Technical Advisory notes that prescribing thresholds of significance is generally the purview of the lead agency’s “judgment and discretion, based upon factual data and guidance from regulatory

²² Office of Planning and Research, Technical Advisory, *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review*, June 19, 2008.

agencies and other sources where available and applicable.”²³ Adopting significance thresholds is not mandatory, however, and the Technical Advisory specifically notes that “the global nature of climate change warrants investigation of a statewide threshold of significance for GHG emissions.”²⁴ Until such time as a statewide threshold is adopted, the Technical Advisory recommends that compliance with CEQA entails three basic steps: “identify and quantify the GHG emissions; assess the significance of the impacts on climate change; and, if the impact is found to be significant, identify alternatives and/or mitigation measures that will reduce the impact below significance.”²⁵ More recently, the AQMD published a *Draft AQMD Staff CEQA Greenhouse Gas Significance Threshold* in October 2008, which provides a significance screening level of 3,000 metric tons/year of CO₂e for commercial/residential projects.²⁶ This standard uses a tiered approach and has not been approved by the AQMD at this time. In addition, CARB published GHG threshold guidance in October 2008, which recommends a significance screening level of 7,000 metric tons/year of CO₂e.²⁷

On the federal level, there has been activity with respect to the regulation of GHGs. In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006, and decided April 2, 2007, the U.S. Supreme Court held that not only did the US EPA have authority to regulate GHGs, but that the EPA's reasons for not regulating this area did not fit the statutory requirements. As such, the U.S. Supreme Court ruled that the USEPA should be required to regulate CO₂ and other GHGs as pollutants under the CAA.

**California Health and Safety Code, Division 26 Air Resources, Part 4
Nonvehicular Air**

Pollution Control, Chapter 4 Enforcement, §42301.6

This regulation requires new or modified sources of air contaminants located within 1,000 feet from the outer boundary of a school to give public notice to the parents of school children before an air pollution permit is granted.

Education Code §17213(b) and PRC §21151.8(a)(1)(2)

This regulation requires school districts to consider off-site sources of HAPs before acquiring property for a school site or approving an EIR or negative declaration for a school site acquisition or new school construction project. These sections require school districts to consult with appropriate agencies to identify facilities, including but not limited to freeways and other busy traffic corridors, large agricultural operations, and rail yards within one-fourth of a mile of a proposed school site that might reasonably be expected to emit hazardous air emissions.

²³ *Ibid*, p. 4.

²⁴ *Ibid*, p.5

²⁵ *Ibid*, p. 5.

²⁶ SCAQMD. *Proposed Tiered Decision Tree Approach Greenhouse Gas CEQA Significance Threshold*. Working Group Preliminary Draft – Discussion Purposes Only. Revised July 15, 2008.

²⁷ CARB. *Preliminary Draft Staff Proposal Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the CEQA*. October 24, 2008

CCR Title 13, §2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools

This regulation limits idling times for school buses, transit buses, and other commercial vehicles (gross vehicle weight greater than 10,001 pounds, except for pickup trucks) when they are stopping at a school or located within 100 feet of a school (schools at or below the 12th grade level). This regulation also requires that drivers of buses and commercial vehicles be informed of this regulation by the motor carrier (i.e., vehicle owner) and that the motor carrier keep records of compliance/noncompliance with this regulation.

Regional

Regional Comprehensive Plan and Guide

Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, and its work addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG is the federally-designated metropolitan planning organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. As the designated MPO, SCAG is mandated by the federal government to develop and implement regional plans that address transportation, growth management, hazardous waste management, and air quality issues. With respect to air quality planning, SCAG has prepared the regional comprehensive planning guide (RCPG) for the Los Angeles County region which includes Growth Management and Regional Mobility chapters that form the basis for the land use and transportation components of the air quality management plan (AQMP), discussed in greater detail below.

Air Quality Management Plan

SCAQMD and SCAG are responsible for preparing the AQMP for the District, which address federal and state CAA requirements. The AQMP details goals, policies, and programs for improving air quality and establishes thresholds for daily operation emissions. Environmental review of individual projects within the region must demonstrate whether daily construction and operation emissions thresholds established by the SCAQMD would be exceeded, and whether the proposed project would increase the number or severity of existing air quality violations. SCAQMD adopted a comprehensive AQMP update for the AQMP on August 1, 2003. The 2003 AQMP outlined the air pollution control measures needed to meet federal health-based standards for O₃ (one-hour standard) by 2010, and for PM₁₀ by 2006. It also demonstrates how the federal standard for CO, achieved for the first time at the end of 2002, will be maintained.²⁸ The 2003 AQMP is consistent with and builds upon the approaches taken in the 1997 AQMP and the 1999 Amendments to the O₃ SIP for the SCAB for the attainment of the federal O₃ air quality standard. Lastly, the plan takes a preliminary look at what will be needed to achieve new and more stringent health standards for O₃ and PM_{2.5}.

The current AQMP was adopted by the SCAQMD Governing Board on June 1, 2007. The purpose of the 2007 AQMP is to set forth a comprehensive program that will lead the region into

²⁸ The Basin was re-classified as attainment for the federal CO standards on June 11, 2007.

compliance with federal 8-hour ozone and PM_{2.5} air quality standards. The 2007 AQMP proposes attainment of the federal PM_{2.5} standards through a more focused control of SO_x, directly-emitted PM_{2.5}, and NO_x supplemented with VOCs by 2015. The 8-hour ozone control strategy builds upon the PM_{2.5} strategy, augmented with additional NO_x and VOCs reductions to meet the standard by 2024. The AQMP proposes policies and measures currently contemplated by responsible agencies to achieve federal standards for healthful air quality in the Basin. This Plan also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools. The 2007 AQMP builds upon the approaches taken in the 2003 AQMP for SCAB for the attainment of the federal ozone air quality standard. However, this Draft Plan highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under federal CAA.

Air Toxics Hot Spots Program

Locally, SCAQMD administers the Air Toxics Hot Spots program (AB 2588), which is intended to reduce public exposure to TACs from stationary sources in the SCAB. The Air Toxics “Hot Spots” Information and Assessment Act, codified in the California Health and Safety Code, requires operators of specified facilities to submit comprehensive emissions inventories and reports to SCAQMD by specified dates. SCAQMD reviews the reports and then places the facilities into high-, intermediate-, and low-priority categories, based on the potency, toxicity, quantity, and volume of emissions and on the proximity of receptors, including sensitive receptors, to the facility. Facilities designated as high-priority must prepare a health risk assessment. If the risk is above specified levels, facilities are required to notify the surrounding population and may be required to develop and implement a risk reduction plan. The AQMD has also developed “industry-wide” inventories and assessed risks of small business facilities with emissions that are easily characterized. Some of the facilities in the industry-wide program are gas stations, small auto body shops, small dry cleaners, plating shops, and fiberglass product manufacturers. This information can then be used as an initial screening tool to determine whether a particular site is advisable for siting a sensitive receptor, or vice versa.

Additional Rules and Regulations

The SCAQMD also adopts rules and regulations to implement portions of the AQMP by limiting the amount of emissions generated throughout the Basin by various stationary, area, and mobile sources. These rules not only regulate the emissions of federal and state criteria air pollutants, but also TACs and acutely hazardous materials. In particular, stationary emissions sources subject to these rules are regulated through SCAQMD’s permitting process. Through this permitting process, SCAQMD also monitors the amount of stationary emissions being generated and uses this information in developing updates to the AQMP. The rules are subject to ongoing refinement by the SCAQMD. Several of these rules may apply to construction or operation of the project.

SCAQMD Rule 403 requires the implementation of best available fugitive dust control measures during active operations capable of generating fugitive dust emissions from onsite earth-moving activities, construction/demolition activities, and construction equipment travel on paved and

unpaved roads. As another example, SCAQMD Regulation XIII ensures that the operation of new facilities do not interfere with the attainment of the federal standards.

SCAQMD Rule 1403 regulates asbestos and dictates how demolition, renovation and asbestos removal projects are to be properly and legally conducted. The purpose of this rule is to specify work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials. The requirements for demolition and renovation activities include asbestos surveying, notification, asbestos removal procedures and time schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for asbestos-containing waste materials. Rule 1403 applies to any project where building materials are being disturbed in quantities greater than 100 square feet.

CARB and SCAQMD Land Use Planning Guidelines

The CARB recently adopted the *Air Quality and Land Use Handbook* (CARB, 2005) to provide guidance to planning agencies and air districts for considering potential impacts to sensitive land uses proposed in proximity to TACs emission source(s). The goal of the guidance document is to protect sensitive receptors, such as children, seniors, and acutely ill and chronically ill persons, from exposure to TACs emissions. CARB's siting guidelines recommend the following: (1) avoid siting sensitive receptors within 500 feet of freeways and high-traffic roads (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day); (2) avoid siting sensitive receptors within 1,000 feet of an applicable distribution center; and (3) avoid siting sensitive receptors within 300 feet of a dry cleaning facility that uses perchloroethylene. The recommendations provided are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. In addition, reducing diesel particulate matter (DPM) is one of CARB's highest public health priorities and is the focus of a comprehensive statewide control program that is reducing DPM emissions each year. CARB's long-term goal is to reduce DPM emissions 85 percent by 2020.

SCAQMD has adopted similar guidelines in the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005), which also considers impacts to sensitive receptors from facilities that emit TACs emissions. SCAQMD's distance recommendations are the same as CARB's in that a 500-foot siting distance for sensitive receptors is recommended in proximity of freeways and high-traffic roads, and SCAQMD's criteria includes siting distances for distribution centers and dry cleaning facilities. SCAQMD's document introduces land use related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

SCAQMD is in the process of developing an *Air Quality Analysis Guidance Handbook* to replace the *CEQA Air Quality Handbook* approved by the AQMD Governing Board in 1993. The new Handbook is intended to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts, pursuant to the CEQA. This handbook provides standards, methodologies, and procedures for conducting air quality analyses in CEQA documents and was used extensively in the preparation of this analysis.

Local

The City of South Gate General Plan was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. This plan must be integrated, internally consistent, and present goals, objectives, policies, and implementation guidelines for decision makers to use. The 1986 revision of the General Plan serves to aid the greater South Gate area by focusing on issues that are of greatest concern to the community, while still maintaining economic growth and improving the quality of life. To achieve these goals, seven elements have been adopted to provide flexibility in implementation of the policies and objectives of the General Plan. The following policies contained in the General Plan are relevant to air quality concerns associated with the proposed project:

- Infrastructure Element, Policy 1.5: Commercial Vehicle Travel on all noncommercial areas will be minimized as much as possible.
- Resource Management Element, Policy 1.5: Support the efforts, goals and plans of the South Coast Air Quality Management District in reducing the level of air pollution in the Southern California region.

As discussed above, the proposed project would serve to implement policies of the City of South Gate and SCAQMD. The proposed project, by virtue of its location and design, exhibits many attributes that have a positive direct and indirect benefit with regard to the reduction of traffic congestion. Based upon this evaluation, it is concluded that the proposed project would be consistent with City of South Gate policies as it implements the goals and policies pertaining to air quality set forth in the General Plan.

3B.4 Impacts and Mitigation Measures

Methodology

Construction

Mass daily combustion emissions and off-gassing emissions were compiled using the URBEMIS2007 computer model. The URBEMIS2007 model separates the construction process into phases. For the proposed project, the initial construction phase would require demolition and removal of the existing structures and asphalt from paved areas. Excavation of soils would be required, following by grading activities. The school buildings, parking area, and recreational fields would be constructed and the final phase would include painting of the structures. Each phase would generate emissions, such as fugitive dust emissions resulting from structure demolition, as well as combustion exhaust emissions that result from on-site construction equipment, haul truck trips, and worker commute trips. A complete listing of the construction equipment by phase and construction phase duration assumptions used in this analysis is included within the URBEMIS2007 printout sheets provided in Appendix AC of this Recirculated DEIR of this August 2009 FEIR.

In addition to the *CEQA Air Quality Handbook*, the SCAQMD published the *Localized Significance Threshold Methodology for CEQA Evaluations* (SCAQMD Localized Significance Threshold [LST] Guidance Document) that is intended to provide guidance in evaluating

localized effects from mass emissions during construction.²⁹ The SCAQMD updated this guidance with *Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*.³⁰

Operation

URBEMIS2007 was also used to compile long-term project operational emissions from mobile sources. In calculating mobile-source emissions, the URBEMIS2007 ~~default~~ trip length assumptions were not changed from the default value of 9.26 mile per trip average, to reflect potential long-term operational emissions resulting from mobile sources related to travel to and from Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the new playfields. ~~a specific vehicle trip length identified by LAUSD~~. As documented in the PEIR, student vehicles traveling to and from central region elementary schools travel an average of 0.25 mile per trip.³¹ Non-student (e.g., administration and delivery) trip lengths were modeled as the URBEMIS2007 default option. Stationary source emissions were also compiled using URBEMIS2007. The analysis of roadway CO impacts followed the protocol recommended by Caltrans and published in the *Transportation Project-Level Carbon Monoxide Protocol*.³² It is also consistent with procedures identified through the SCAQMD's CO modeling protocol. The CO hotspot analysis worksheets and assumptions are provided in Appendix ~~AC~~ of the DEIR 2008-of this August 2009 FEIR.

Criteria for Determining Significance

The criteria used to determine the significance of an impact related to air quality are based on the *CEQA Guidelines* and SCAQMD standards.^{33,34} The proposed project may result in significant air quality impacts if it would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

CEQA allows for the significance criteria established by the applicable AQMP or air pollution control district to be used to assess the impact of a project on air quality. The SCAQMD has established the air pollution emissions criteria shown in **Table 3B-4** for determining the significance of an impact during project construction and operation.

²⁹ SCAQMD, *Localized Significance Threshold Methodology*, June 2003.

³⁰ SCAQMD, *Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*, October 2006.

³¹ LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*. Published May 2004, Board Certified June 8, 2004. p. 3.1-1.

³² California Department of Transportation, *Transportation Project-Level Carbon Monoxide Protocol*, December 1997.

³³ *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15152, 2004.

³⁴ SCAQMD, *CEQA Air Quality Handbook*, April 1993.

**TABLE 3B-4
SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS**

Mass Daily Thresholds		
Pollutant	Construction	Operation
NO _x	100 lbs/day	55 lbs/day
VOC ^a	75 lbs/day	55 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
TACs and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk \geq 10 in 1 million Hazard Index \geq 1.0 (project increment) Hazard Index \geq 3.0 (facility-wide)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants^b		
NO ₂	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.25 ppm (state) 0.053 ppm (federal)	
1-hour average		
annual average		
PM _{2.5}	10.4 $\mu\text{g}/\text{m}^3$ (recommended for construction) ^c	
24-hour average	2.5 $\mu\text{g}/\text{m}^3$ (operation)	
annual arithmetic mean	12 $\mu\text{g}/\text{m}^3$	
PM ₁₀	10.4 $\mu\text{g}/\text{m}^3$ (recommended for construction) ^c	
24-hour average	2.5 $\mu\text{g}/\text{m}^3$ (operation)	
annual geometric average	1.0 $\mu\text{g}/\text{m}^3$	
annual arithmetic mean	20 $\mu\text{g}/\text{m}^3$	
Sulfate	1 $\mu\text{g}/\text{m}^3$	
24-hour average		
CO	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) 9.0 ppm (state/federal)	
1-hour average		
8-hour average		

lbs/day = pounds per day
ppm = parts per million
 $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter
 \geq = greater than or equal to

- a. For purposes of this analysis, VOC is equivalent to ROC.
b. Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2 unless otherwise stated.
c. Ambient air quality threshold based SCAQMD Rule 403.

SOURCE: SCAQMD, *CEQA Air Quality Handbook*, 1993; SCAQMD, *Localized Significance Methodology*, June 2008.

Regarding local CO emissions from roadway traffic, the proposed project would result in a significant air quality impact if it would: (1) cause or contribute to exceeding the California one-hour CO standard of 20 ppm, or the eight-hour CO standard of 9.0 ppm, at an intersection or roadway near a sensitive receptor; or (2) create an incremental increase in CO levels equal to or

greater than 1.0 ppm for the one-hour standard, or 0.45 ppm for the eight-hour standard, at an intersection or roadway near a sensitive receptor.

With respect to GHG emissions, no air agency (including SCAQMD) or municipality has approved project-level significance thresholds for GHG emissions. Furthermore, the regulations required to meet the goal under AB 32 of reducing emissions to 1990 levels by 2010 are still under development, with implementation of such regulations expected to occur no later than January 1, 2010. At this time, there is no single criterion by which the implementation of a project can be judged to support or hinder attainment of the State's goals.

In 2007, the City of Los Angeles published *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan),³⁵ outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal of reducing emissions of CO₂e to 35 percent below 1990 levels.³⁶ To achieve this, the City will 1) increase the generation of renewable energy, 2) improve energy conservation and efficiency, and 3) change transportation and land use patterns to reduce dependence on automobiles. The proposed project's consistency with applicable goals and policies will be analyzed.

Project Impacts

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were potentially significant (see Appendix A of the DEIR-2008). The impact analysis included both construction related impacts and operational related impacts.

Impact 3B.1: Violate an air quality standard or contribute to an existing or projected air quality violation.

Regional Construction Emissions

Less Than Significant Impact. Construction of the proposed project has the potential, through the use of heavy-duty construction equipment and from trips generated by construction workers commuting to and from the proposed project site, to impact air quality. Fugitive dust emissions would result from site preparation, grading, and other construction activities. Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as bulldozers, wheeled loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings such as paints and other building materials would release ROCs. The assessment of construction air quality impacts considers all of these potential sources. Construction emissions can substantially vary from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction of the proposed project is anticipated to begin in the summer of 2010 and be completed in the summer of 2011. This would provide for the target opening date of fall of 2012 for the new school. Due to the on-site contamination resulting from previous land uses,

³⁵ City of Los Angeles, *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*, May, 2007.

³⁶ *Ibid.*

remediation would be required.³⁷ Approximately 3,000 cubic yards of soils would be hauled off-site. The proposed project site would be graded and compacted as needed, structural piles will be driven into the ground, followed by completion of necessary trenching (e.g., for utility hookups to buildings). The building footings, buildings, and utilities would then be constructed. The area surrounding the buildings would be covered with concrete and asphalt; new curb-cuts and driveways would be added; new sidewalks would be located along the perimeter of the proposed project site; landscaping, site fencing, and any final work would be completed. The construction site and staging areas would be clearly marked and barriers installed. Construction staging areas would be located north of Tweedy Avenue, where the parking lot and classroom areas are proposed.

It is mandatory for all construction projects in the basin to comply with SCAQMD Rule 403 for fugitive dust.³⁸ Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, re-establishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas.³⁹ Incorporating SCAQMD Rule 403 compliance into the proposed project would reduce regional PM_{2.5} and PM₁₀. LAUSD shall require its construction contractor to comply with Rule 403.

Daily construction-related regional emissions for the proposed project are presented in **Table 3B-5**. As shown, maximum unmitigated regional emissions would not exceed the SCAQMD daily significance thresholds for ROC, NO_x, CO, PM_{2.5} or PM₁₀. Therefore, potential impacts to regional air quality during construction would be less than significant.

Mitigation Measures

No mitigation measures required.

Residual Impacts

Residual impacts are less than significant.

Local Construction Emissions

Significant and Unavoidable With Mitigation Incorporated. Sensitive receptor exposure to localized construction pollutants was calculated based on the SCAQMD LST Guidance Document. This methodology recommends the use of dispersion modeling when evaluating impacts from sites that are larger than five acres in size. The most intense construction would occur on the northern portion of the site, where the school facilities would be constructed. The grading required to develop the play fields proposed on the south would be minimal grading and would require no hauling of soils during construction. As a result, potential impacts to the sensitive receptors to the north of the proposed school Wood Avenue were evaluated to determine the worse case scenario.

³⁷ Parsons, *Phase I Soil-Gas Investigation Report for the proposed South Region Middle School No. 4 and South Region High School No. 9*, February 2007.

³⁸ SCAQMD, Rule 403 – Fugitive Dust, June 3, 2005.

³⁹ *Ibid.*

**TABLE 3B-5
UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS**

Year (Phase)	Estimated Emissions (lbs/day)				
	ROC	NO _x	CO	PM ₁₀ ^a	PM _{2.5} ^a
2009 (Mass Grading)	9	87	44	42	12
2010 (Demolition/Fine Grading /Building)	9	81	41	85	20
2011 (Building / Trenching/Paving/Coating)	37	58	43	4	3
Maximum Regional Daily Total	37	87	44	85	20
Regional Significance Threshold	75	100	550	150	55
Significant Impact?	No	No	No	No	No

a. The estimation of PM_{2.5} and PM₁₀ emissions during the site preparation/grading phase assumed to comply with SCAQMD Rule 403 (Fugitive Dust).

SOURCE: ESA, May 2009.

The US EPA approved dispersion model AERMOD was used to determine construction impacts on localized air quality. Meteorological data from the Lynwood station was obtained from SCAQMD's website for use in the AERMOD dispersion modeling. Since opaque cloud cover is not available for this site, data from the Los Angeles International Airport was used to supplement this data for use in the model. Source and receptor elevations were derived from the one-minute Long Beach digital elevation model.

Emissions from construction equipment were modeled as a series of volume sources with a release height of five meters as suggested in the SCAQMD's LST Guidance Document.⁴⁰ Fugitive dust emissions were modeled as area sources with an initial vertical dimension of one meter. Due to the size of the site, emissions were modeled assuming that activities would be concentrated on one of three five-acre sites. This represents a conservative analysis by concentrating emissions in a smaller area, thus increasing localized concentrations. Daily emission rate estimates generated by URBEMIS were used in this analysis. However, the emissions from worker and vendor trips were not included as part of this analysis since these emissions are made on a regional rather than local scale. The maximum on-site emissions for each pollutant were added to the AERMOD dispersion model to determine localized impacts. As shown in **Table 3B-6**, the maximum mitigated on site emissions of PM₁₀ and PM_{2.5} would exceed the thresholds recommended by the SCAQMD. Therefore, construction impacts to localized air quality would be significant and unavoidable.

⁴⁰ SCAQMD. *Sample Construction Scenarios for Projects less than Five Acres in Size*. January. 2005.

**TABLE 3B-6
LOCALIZED POLLUTANT CONCENTRATIONS FROM CONSTRUCTION EMISSIONS**

Concentrations	NO ₂	CO	CO	PM ₁₀	PM _{2.5}
	1-Hour	1-Hour	8-Hour	24-Hour	24-Hour
Project generated	0.01 ppm	0.1 ppm	0.03 ppm	53.2 µg/m ³	18.3 µg/m ³
Background	0.10 ppm	7.9 ppm	5.1 ppm	NA	NA
Total (project + background)	0.11 ppm	8.0 ppm	5.13 ppm	NA	NA
Localized Significance Threshold	<i>0.18 ppm</i>	<i>20.0 ppm</i>	<i>9.0 ppm</i>	<i>10.4 µg/m³</i>	<i>10.4 µg/m³</i>
Exceed Threshold?	No	No	No	Yes	Yes

Notes: ppm = parts per million and µg/m³ = micrograms per cubic meter.

- a. The concentration at the nearest sensitive receptor was obtained from the AERMOD model. The concentrations for NO_x and CO were added to the existing ambient concentrations. PM₁₀ impacts are treated differently as the Basin exceeds the State standard. The incremental PM_{2.5} and PM₁₀ concentration threshold of 10.4 µg/m³ is based on SCAQMD Rule 403 requirements.
- b. The LSTs were obtained from the SCAQMD's *Sample Construction Scenarios for Projects less than Five Acres in Size* (January 2005).

SOURCE: ESA, July 2008 and May 2009.

In order to reduce temporary construction impacts to off-site receptors, LAUSD would require its construction contractor to implement LAUSD BMPs (listed as Mitigation Measures AIR-1), however, even with the implementation of these measures, this impact would be considered significant and unavoidable.

Mitigation measures would be implemented to reduce impacts, but the reduction would not result in a less than significant impact.

Mitigation Measures

Mitigation Measure AIR-1:

- General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.
- Apply dust suppressants (e.g., polymer emulsion) to actively disturbed areas upon completion of clearing and grading.
- Replace ground cover in disturbed areas as quickly as possible.
- Water disturbed sites three times daily (locations where grading is to occur will be thoroughly watered prior to earth moving).
- All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches.
- Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.
- During construction, trucks and vehicles in loading and unloading queues would turn their engines off when not in use to reduce vehicle emissions; all construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site.
- Require minimum soil moisture of 12 percent for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe.

- Construction emissions will be scheduled to avoid emission peaks and discontinued during second-stage smog alerts.
- General contractors shall maintain and operate construction equipment to minimize exhaust emissions; all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Significance after Mitigation

Due to the proximity of the site to the nearest sensitive receptor (less than 50 feet) and the level of PM₁₀ emissions during construction, localized impacts would be significant and unavoidable.

Residual Impacts

Residual impacts would be significant and unavoidable.

Operational Emissions

Less Than Significant Impact. Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Mobile source emissions would be the largest source of pollutants resulting from proposed project operation and were estimated using the URBEMIS2007 emissions inventory model. The average of daily trips is based on information from the Traffic Impact Study prepared for the proposed project (see Appendix **AJ**), as well as the trip generation rates provided by the Institute of Transportation Engineers (ITE) *Trip Generation Manual*.⁴¹ According to the traffic study, the proposed project would generate 558 AM peak-hour trips (301 inbound trips and 257 outbound trips) and 430 PM peak-hour trips (314 inbound trips and 116 outbound trips).⁴² Stationary source emissions were also compiled using URBEMIS2007. **Table 3B-7** shows the project operational emissions. As presented in Table 3B-7, regional operational emissions would not exceed the SCAQMD significance thresholds. Therefore, the air quality impacts resulting from project operations would be less than significant.

**TABLE 3B-7
UNMITIGATED OPERATIONAL EMISSIONS**

Proposed Uses	Estimated Unmitigated Emissions (lbs/day)				
	ROC	NO _x	CO	PM _{2.5}	PM ₁₀
Mobile Sources	13	21	149	30	6
Area Sources	1	2	3	<1	<1
Maximum Regional Total	14	23	152	30	6
Regional Significance Threshold	55	55	550	55	150
Significant Impact?	No	No	No	No	No

SOURCE: ESA, 2008

⁴¹ ITE, *Trip Generation Manual*, 7th Edition, 2004.

⁴² KOA, *Traffic Study for LAUSD South Region High School #9*, July 2008.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

Impact 3B.2: Expose sensitive receptors to substantial pollutant concentrations.

Construction Emissions

Significant and Unavoidable with Mitigation Incorporated. Health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime would contract cancer, based on the use of standard risk-assessment methodology. Construction would be accomplished in less than three years and the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions related to construction activities. In addition, as described in Impact 3B1 above, construction of the proposed project would not result in a significant regional air pollution impact. Even so, as discussed in Impact 3B1 above, project construction could expose nearby sensitive receptors to substantial PM₁₀ concentrations. As such, project-related construction impacts to sensitive receptors would be significant and unavoidable.

Mitigation Measures

Mitigation Measure AIR-1, which assumes compliance with SCAQMD Rule 403, will be implemented to reduce potential impacts during construction.

Significance after Mitigation

Due to the proximity to the nearest sensitive receptor (less than 50 feet) and the level of PM₁₀ emissions during construction, localized impacts remain significant and unavoidable.

Residual Impacts

Exposure of sensitive receptors to substantial pollutant concentrations during construction would remain significant and unavoidable.

Operational Emissions

Less Than Significant Impact. During project operation, project traffic would have the potential to create local area CO impacts to sensitive receptors. The SCAQMD recommends a hot-spot evaluation of potential localized CO impacts when volume-to-capacity (V/C) ratios are increased by two percent at intersections with a level of service (LOS) of D or worse. The SCAQMD also recommends a CO hot-spot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from an LOS of C to D. Intersections were analyzed based on information provided in the traffic study prepared for the proposed project.⁴³ Of the 11

⁴³ KOA, *Traffic Study for LAUSD South Region High School #9*, July 2008.

intersections analyzed in the traffic study, the following are operating at unacceptable levels of service (LOS E or F) and required further analysis:

- Atlantic Avenue and Firestone Boulevard (LOS F at both AM and PM peak hours);
- Rayo Avenue and Firestone Boulevard (LOS F at both AM and PM peak hours);
- Atlantic Avenue and Wood Avenue (LOS F at both AM and PM peak hours);
- Atlantic Avenue and Tweedy Boulevard (LOS E at PM peak hour); and
- Atlantic Avenue and Wright Road (LOS F at AM peak hour).

Local area CO concentrations were projected using the CALINE4 traffic pollutant dispersion model. The analysis of CO impacts followed the protocol recommended by the California Department of Transportation (Caltrans) published in the *Transportation Project-Level Carbon Monoxide Protocol*.⁴⁴ It is consistent with procedures identified through the SCAQMD's CO modeling protocol, with all four corners of each intersection analyzed to determine whether the project development would result in a CO concentration that exceeds federal or state CO standards. As stated in the protocol, receptor locations for the one-hour analysis were located three meters (approximately 9.8 feet) from each intersection corner; receptor locations for the eight-hour analysis were located seven meters (approximately 23 feet) from each intersection corner.

Table 3B-8 presents one-hour and eight-hour CO concentrations for the peak hour. CO concentrations were estimated for existing (year 2007) conditions and the proposed project (year 2012) conditions. Even with cumulative growth in traffic volumes, CO concentrations would be lower in 2012 compared to existing conditions. The reduction in CO concentrations over time is due to a lower emitting fleet mix than what currently exists. As vehicles age and no longer function properly, they are replaced in the overall fleet by newer, less polluting vehicles.⁴⁵ As shown in Table 3B-8, the proposed project would not contribute to the formation of a CO hotspot and proposed project operations would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant, and no mitigation measures are required.

Mitigation Measures

No mitigation measures required.

Residual Impacts

Residual impacts are less than significant.

⁴⁴ California Department of Transportation, *Transportation Project-Level Carbon Monoxide Protocol*, December 1997.

⁴⁵ This discussion is consistent with CO mobile source emission factors used in CARB's EMFAC2007 emissions inventory model.

**TABLE 3B-8
RESULTS OF CO ANALYSIS FOR THE PROPOSED PROJECT – PEAK HOUR**

Intersection	CO Concentration Existing Conditions (ppm) ^a	CO Concentration 2012 Conditions (ppm) ^b	Significance Criteria (ppm)	Impact?
Atlantic Avenue and Firestone Boulevard				
One-hour Concentration	9.5	9.3	20	No
Eight-hour Concentration	6.6	6.5	9.0	No
Rayo Avenue and Firestone Boulevard				
One-hour Concentration	9.8	9.5	20	No
Eight-hour Concentration	6.9	6.6	9.0	No
Atlantic Avenue and Wood Avenue				
One-hour Concentration	9.0	8.7	20	No
Eight-hour Concentration	6.1	6.0	9.0	No
Atlantic Avenue and Tweedy Boulevard				
One-hour Concentration	9.1	8.8	20	No
Eight-hour Concentration	6.3	6.1	9.0	No
Atlantic Avenue and Wright Road				
One-hour Concentration	9.0	8.6	20	No
Eight-hour Concentration	6.2	5.9	9.0	No

a Existing concentrations include year 2007 one- and eight-hour ambient concentrations of 7.8 and 5.3 ppm, respectively.

b Concentrations from year 2007 were used to represent background concentrations. This represents a conservative analysis as background concentrations are expected to decrease overtime as emission rates are reduced.

SOURCE: ESA, 2008.

Impact 3B.3: The project would have a significant impact if it would conflict with the State goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth in the timetable established by AB32, California Global Warming Solutions Act of 2006.

Less Than Significant Impact. AB 32 mandates that the State implement programs, develop strategies, and adopt regulations to reduce GHG emissions to 1990 levels by 2020 on a statewide basis. The State has promulgated AB 1493, which will reduce emissions from passenger vehicles starting with 2009 model year vehicles. As newer vehicles replace older, more polluting vehicles in the publicly owned fleet, GHG emissions will continue to be reduced from current levels. One of the guiding principals for the LAUSD is that new schools “give students the opportunity to attend schools in their own neighborhood, [and] reduces the need for long bus rides.” Currently, many schools in LAUSD are overcrowded. These schools rely on year-round schedules and portable classrooms to accommodate extra students. CARB and the Department of Health Services report that almost 33 percent of classrooms in California are portable. Energy consumption in portable classrooms is much less efficient than classrooms housed in traditional buildings due to stand-alone heating and cooling systems that are often inefficient and poorly maintained. Poorly maintained systems can result in increased energy use due to dirty filters. In addition, newer buildings benefit from increased energy efficiency from newer building materials such as insulation and double-paned windows. Many schools that are not considered overcrowded

also use portables in order to house students, as portables are often included in the total number of students a campus can support.

The proposed project would be consistent with these goals, which would reduce vehicle miles traveled, and the resultant GHGs as compared to existing levels. In addition, newer building materials and codes would improve the energy efficiency of LAUSD schools, as compared to existing facilities. Therefore, the proposed project would be consistent with Smart Growth principals and would help the State meet its goal of reducing emissions of GHGs.

The proposed project would, however, result in direct emissions of GHGs from construction and operation. Project-related GHG emissions from construction and operation were calculated using URBEMIS2007 and USEPA emission factors. CO₂e emissions associated with the proposed project are shown in **Table 3B-9**.

TABLE 3B-9
ESTIMATE OF PROJECT-RELATED GREENHOUSE GAS EMISSIONS (ANNUAL)^a

	CO ₂ e
California Statewide Average Daily Emissions (year 2004)	2,972,314,499
Maximum Daily Emissions During Construction	710
Operations-period Emissions	
Mobile Source	2,847
Area Source	668
Energy Use	2,847
Existing Use Daily Emissions	NA
Net GHG Emissions during Long-term Operations	3,794

NOTES: URBEMIS 2007 output and energy emissions calculation worksheets are provided in the air quality Appendix C.

SOURCE: ESA, November 2008.

During project construction, worst-case GHG emissions would be approximately 720 CO₂e. With respect to long-term proposed project operations, GHG emissions would be approximately 3,794 CO₂e pounds per day. This amount represents less than 0.000128 percent of the statewide total daily GHG emissions. Based on the data and analysis summarized herein, project-related GHG emissions represent less than a fraction of a percent of total 1990 Statewide GHG emissions. Therefore, impacts are considered to be less than significant.

Mitigation Measures

No mitigation measures required.

Residual Impacts

Residual impacts are less than significant.

3B.5 Cumulative Impacts

Impact 3B.4: The project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

Less Than Significant Impact. There are six related projects identified within the proposed project study area. The related projects include the development of hundreds of thousands of square feet of land uses, a number that is many times greater than the project. SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this Draft EIR, in which foreseeable future development within a given service boundary or geographical area is predicted and associated impacts measured. The SCAQMD cumulative analysis focuses on whether a specific project would result in cumulative considerable emissions. Per CEQA Guidelines §15064(h)(4), the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Regional construction and operational emissions are shown in Tables 3B-5 and 3B-7, respectively. Regional emissions would be less than the applicable SCAQMD thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. Therefore, the proposed project would not contribute to a cumulatively considerable construction air quality impact.

In addition, the proposed project is consistent with the goal of reducing GHG emissions by reducing vehicle miles traveled (VMT) and resultant GHG emissions as compared to existing levels. Newer building materials and codes would improve the energy efficiency of LAUSD schools, as compared to existing facilities. Finally, the proposed new buildings would decrease the use of portables. Therefore, the proposed project would be consistent with smart growth principles and would help the state meet its goal of reducing emissions of GHG. Project-related GHG emissions would not be considered cumulatively considerable.

Mitigation Measures

No mitigation measures required.

Residual Impacts

Residual impacts are less than significant.

SECTION 3C

Geology and Soils

3C.1 Introduction

This section evaluates potential geologic and soils hazards associated with the proposed project, including, surface rupture, ground shaking, ground failure, liquefaction, landslides, mudflows, and subsidence of the land. The information and findings in this section are supported by summarized the Geotechnical Study for the proposed project (*refer to Appendix D of this August 2009 FEIR*).¹ In addition, a design memorandum for the project area developed by the US Army Corps of Engineers (USACE) was utilized.²

3C.2 Existing Environmental Setting

General Site Conditions

The proposed project site is situated in an urbanized area; most of the parcels that comprise the site were formerly developed with industrial buildings and asphalt parking areas. The site is primarily vacant with the exception of two buildings, both planned for demolition as part of the proposed project. The project site is nearly flat with an elevation of about 95 feet above mean sea level.³

Geologic Setting

The project site is located on the Downey Plain in the Los Angeles Basin within the Transverse Ranges Geomorphic Province in Southern California.⁴ The site is not located within an Alquist-Priolo Fault-Rupture Hazard Zone.⁵ Although there are no faults on-site, the site is located in a seismically active area, as is the case throughout the Southern California region.⁶ The closest known active faults are the Newport-Inglewood and Whittier faults located approximately six miles to the southwest and nine miles east of the project site, respectively.⁷ The Elysian Park

¹ Geomatrix, *Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report*, Board Certified June 8, 2004.

² U.S. Army Corps of Engineers, *Design Memorandum No. 5 For Los Angeles River Improvements (Rio Hondo Confluence to Century Freeway), Rio Hondo Channel Improvements (Firestone Boulevard to Los Angeles River)*, Department of the Army, Los Angeles District, Corps of Engineers, Los Angeles, CA, 1999.

³ Geomatrix, *Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report*, Board Certified June 8, 2004, p. 2.

⁴ *Ibid.*, p. 2

⁵ *Ibid.*, p. 6.

⁶ *Ibid.*, p. 6.

⁷ *Ibid.*, p. 3.

thrust underlies the northern end of the Los Angeles Basin, approximately five miles north of the site.⁸ Consequently, the potential for surface ground rupture due to faulting is considered low.⁹

The project site is underlain by Holocene alluvium, consisting predominantly of loose to medium dense, very coarse-grained to very fine-grained sand, gravel, and silt.¹⁰ Groundwater levels at the site have been mapped at very shallow depths of eight feet below the ground surface.¹¹ The topography of the site and surrounding area is relatively level, with the exception of the Los Angeles River levee.

Liquefaction and Seismic-Related Ground Failures

Liquefaction is a seismic phenomenon in which loose, saturated, fine grained granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low-density, fine, clean sandy soils; and (3) high-intensity ground motion. The project site is relatively level, and effects of liquefaction on level ground can include sand boils, settlement, and bearing capacity failures below structural foundations. Lateral spreading also can occur in areas of sloping ground. Seismic dynamic settlement is a typical term applied to settlement of loose to medium dense granular soils above groundwater.

The project site is underlain by Holocene alluvium that consists of loose to medium dense very coarse-grained to very fine-grained sand, gravel, and silt. Coupled with very shallow groundwater levels of as little as eight feet; the site is susceptible to liquefaction. According to the State of California Seismic Hazard Zones official map, the site is located within a liquefaction zone.¹² The proximity of the site to the Los Angeles River means that liquefaction at the site could potentially cause lateral spreading toward the river, resulting in ground cracking and deformations, which would damage buildings, structures, and the levee separating the site from the Los Angeles River.¹³

Slope Stability and Landslides

Landslides are the downslope movement of soil and/or rock under the influence of gravity. Landslide processes are influenced by factors such as thickness of soil or fill over bedrock, steepness and height of slope, physical properties of the fill, soil or bedrock materials, and moisture content. Earthquake ground shaking can reduce the stability of a slope and cause sliding or falling of the soil or rock materials composing the slope. Shaking increases the loads that slope materials must sustain to avoid a slide; if the forces causing the landslide exceed the strength of the materials resisting the slide, instability is created and results in lateral or downslope displacement of the slope materials.

⁸ *Ibid*, p. 3 and Figure 3.

⁹ *Ibid*, p. 6.

¹⁰ *Ibid*, p. 3.

¹¹ *Ibid*, p. 7.

¹² *Ibid*, p. 7.

¹³ *Ibid*, p. 7.

The project site neither contains nor is located adjacent to natural slopes. However, the Los Angeles River concrete-lined earthen levee is located adjacent to the site. The Los Angeles River improvements were implemented to increase the flood flow capacity of the existing channel, from an exceedance frequency of approximately 25-years to 133-years, in the improved reaches. In addition, the project will prevent catastrophic levee failures within the lower Los Angeles River.¹⁴ Ground shaking related to an earthquake could result in liquefaction of the soils beneath the levee, resulting in flooding at the project site if water levels are high enough in the Los Angeles River. Even so, the probability of a major local earthquake and flood flows occurring simultaneously is extremely low.¹⁵

3C.3 Applicable Regulations

Title 24, California Building Code is assigned to the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or they are not enforceable. The California Building Code incorporates by reference the Uniform Building Code (UBC) with necessary California amendments. About one-third of the text within the California Building Code has been tailored for California earthquake conditions.

California Education Code Section 17212.5. This section of the CEC requires that geological and soil engineering studies, as described above, be prepared for the construction of any school building or if the estimated cost exceeds twenty thousand dollars (\$20,000) for the reconstruction or alteration of or addition to any school building for work that alters structural elements. No school building shall be constructed, reconstructed, or relocated on the trace of a geologic fault along which surface rupture can reasonably be expected to occur within the life of the school building.

Title 5 (Education), Section 14010, Standards for School Site Selection, of the California Code of Regulations (CCR). This section of the CCR requires that, pursuant to CEC Sections 17212 and 17212.5, the site not contain an active earthquake fault or fault trace, and that the site can not be subject to moderate to high liquefaction or landslides. Pursuant to Education Code Section 17212, school buildings (rather than sites) cannot be located on the trace of a geologic fault along which surface rupture can be reasonably expected to occur within the life of the building.

Title 5, Section 14011, Procedures for Site Acquisition-State-Funded School Districts of the CCR. In compliance with Education Code Sections 17212 and 17212.5, the geological and soils engineering study must address all of the following:

- a) The nature of the site, including a discussion of liquefaction, subsidence or expansive soils, slope, stability, dam or flood inundation, and street flooding;
- b) Whether the site is located within a special study zone, as defined in Education Code Section 17212;
- c) The potential for earthquake or other geological hazard damage;

¹⁴ U.S. Army Corps of Engineers, *Design Memorandum No. 5 For Los Angeles River Improvements (Rio Hondo Confluence to Century Freeway), Rio Hondo Channel Improvements (Firestone Boulevard to Los Angeles River)*, Department of the Army, Los Angeles District, Corps of Engineers, Los Angeles, CA, 1999. p. vii.

¹⁵ *Ibid*, p. C-12.

- d) Whether the site is situated on or near a pressure ridge, geological fault or trace fault that may rupture during the life of the school building and the student risk factor; and
- e) The economic feasibility of the construction effort to make the school building safe for occupancy.

Los Angeles County General Plan Safety Element. The County's General Plan establishes goals and policies related to geological hazards. The Safety Element addresses issues related to: seismic hazards (including surface rupture, ground shaking, and ground failure) and geologic hazards (including slope instability, landslides, and unstable ground). The Element provides guidance to the public and decision makers regarding policies and actions which can be implemented to create a safer environment. The General Plan Safety Element objective applicable to the proposed project in relation to geological hazards is as follows:

(25) Minimize loss of life and property damage that may occur as a result of earthquakes, geologic hazards, floods, wildland fires, and urban fires.¹⁶

City of South Gate General Plan. The City of South Gate General Plan consists of an integrated set of goals, policies, and implementation measures that focuses on those issues of the greatest concern to the community. The *Hazards Management Element* includes policies applicable to hazards. Currently, the City of South Gate is in the process of updating the General Plan.¹⁷ According to the Hazards Management element:

(a) *Hazards Management Element.* The Element specifically examines potential risk to the residents of the City and the local environment associated with the identified hazards. The Hazards Management Element also identifies the means of reducing the risks, property damage, injuries, or loss of life in the event of a natural or man-made disaster. Specifically, the Hazards Management Element includes:

- The identification, mapping, and appraisal of seismic hazards which should be of concern including areas subject to liquefaction, groundshaking, and surface rupture;
- An appraisal of mudslides, landslides, and slope stability which might occur as a result of a seismic disturbance; and
- The identification of the potential for fires and other natural and man-made disasters and measures designed to reduce the loss of life, injury, and damage to property.

3C.4 Impacts and Mitigation Measures

Methodology

The analysis presented below is based on geotechnical, faulting, and structural investigations prepared for the proposed project, many of which involved field investigations and laboratory

¹⁶ Los Angeles County General Plan Comprehensive Update And Amendment, website: http://planning.lacounty.gov/doc/misc/gpd_EIR_init_stdy.pdf. Date Accessed online on October 28, 2008.

¹⁷ City of South Gate, General Plan Update, website: <http://www.sogate.org/index.cfm/fuseaction/Detail/CID/101/NavID/60/>, accessed online on November 17, 2008.

testing. The findings in these studies, prepared by experts in the geotechnical and structural engineering fields, are based on review of the project relative to its compliance with applicable geotechnical regulations and requirements. Specifically, the methodology utilized data from the Geotechnical Study for the proposed project.¹⁸ In addition, a design memorandum for the project area developed by the USACE was utilized to complete this analysis.¹⁹

Criteria for Determining Significance

The criteria used to determine the significance of an impact related to light and glare are based on Appendix G of the *CEQA Guidelines*. The proposed project may result in a significant impact to geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - Seismic-related ground failure, including liquefaction;
 - Landslides; or
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Project Impacts

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A).

Impact 3C.1: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Less Than Significant Impact. Liquefaction is essentially the transformation of soil to a liquid state, and can result in settlement, uplift of structures, and an increase in lateral pressure on buried structures. Liquefaction potential has been found to be the greatest where the groundwater level and loose sands occur within a depth of about 50 feet or less. The potential for seismic-related ground failure and liquefaction from a groundshaking event depends on the level of shaking, groundwater conditions, the relative density of the soils, and the age of the underlying geologic units. The site is underlain by loose to medium dense very coarse-grained to very fine-grained sand, gravel, and silt, which grade laterally into each other.²⁰ Groundwater levels at the site have been mapped at very shallow depths of eight feet below the ground surface.²¹ As such, areas of

¹⁸ Geomatrix, Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report, Board Certified June 8, 2004.

¹⁹ U.S. Army Corps of Engineers, Design Memorandum No. 5 For Los Angeles River Improvements (Rio Hondo Confluence to Century Freeway), Rio Hondo Channel Improvements (Firestone Boulevard to Los Angeles River), Department of the Army, Los Angeles District, Corps of Engineers, Los Angeles, CA, 1999.

²⁰ Geomatrix, *Preliminary Geotechnical and Geologic Seismic Hazard Investigation Report*, Proposed South Region High School No. 9 and South Region Middle School No. 4 City of South Gate, p. 5.

²¹ *Ibid.*, p. 7.

low bearing capacity would be expected to be encountered in excavations for foundations.²² Static settlement is not likely to be a significant problem for the relatively lightly loaded structures anticipated to be constructed at the site. Most of the soils expected to be encountered at the site would have low expansion potential. Shrink/swell damage can be mitigated by deepening shallow foundations, providing proper moisture control beneath slabs-on-grade, or replacing surficial expansive soil with a low expansive soil layer.²³ To address the potential risks associated with liquefaction, project design features would require the buildings to be supported by piles to assure down-drag due to seismic settlement or liquefaction hazard would not occur. The piles would be designed to provide adequate resistance to seismic events or settlement of soils. As a result, impacts would remain less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

Impact 3C.2: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

Less Than Significant Impact. The topography of the site and surrounding area is relatively level, with the exception of the Los Angeles River levee. The proposed project site is located in a seismically active area, as is the case throughout the Southern California region. Even so, the potential for surface ground rupture due to faulting is considered low.²⁴ Given the proximity of the site to the Los Angeles River, and the potential occurrence of liquefaction and associated lateral spreading toward the river, ground cracking, and deformations could occur. Settlement of the levee could possibly occur in areas where there may be present in the foundation looser deposits of sands and low plastic silty sands (with fines content less than 30 percent) that are saturated and prone to liquefaction and settlement magnitudes within the compacted levee of up to several inches could result.²⁵ This damage would be localized and slope failure or displacement of grouted stone protection resulting in a landslide event is not anticipated to occur. Therefore, the potential for exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, is considered low. As a result, impacts are less than significant.

Mitigation Measures

No mitigation measures are required.

²² *Ibid.* p. 6

²³ *Ibid.* P. 6

²⁴ *Ibid.* p. 6.

²⁵ U.S. Army Corps of Engineers, *Design Memorandum No. 5 For Los Angeles River Improvements (Rio Hondo Confluence to Century Freeway), Rio Hondo Channel Improvements (Firestone Boulevard to Los Angeles River)*, Department of the Army, Los Angeles District, Corps of Engineers, Los Angeles, CA, 1999. p. C-12.

Residual Impacts

Residual impacts would be less than significant.

Impact 3C.3: Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

Less Than Significant Impact. The proposed project could expose people or structures to seismic-related ground failure related to liquefaction. Even so, the potential for surface ground rupture due to faulting is considered low.²⁶ In addition, as discussed in Impact 3C.2 above, the potential for on-site landslide, lateral spreading, subsidence, liquefaction, resulting in the collapse of the levee is considered low. As a result, impacts are less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

3C.5 Cumulative Impacts

Impact 3C.4: Result in cumulatively considerable impact with respect to geology and soil impacts.

Less Than Significant Impact. The project area is located in a seismically active area and future project development could expose additional people and structures to potentially adverse effects associated with earthquakes including seismic ground shaking and seismic related ground failure. However, the potential for surface ground rupture due to faulting is considered low.²⁷ In addition, LAUSD would determine how project development could be designed to minimize exposure of people to potential impacts. The impact of the risks associated with exposure to potential geological and soils hazards is localized and would not affect the immediate vicinity surrounding the project area. The project and the related projects would all be constructed in accordance with the most recent version of the California Building Code seismic safety requirements and recommendations contained in the Project area specific geotechnical reports. Therefore, potential exposure to geological and soils hazards resulting from construction and operation of the proposed project would not result in a cumulatively considerable impact.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

²⁶ *Ibid.*, p. 6.

²⁷ *Ibid.*

SECTION 3D

Hazards and Hazardous Materials

3D.1 Introduction

This chapter presents an evaluation of the potential for hazards and hazardous materials impacts related to the proposed project. As used in this Draft EIR, the term “hazardous materials” refers to both hazardous substances and hazardous wastes. Under federal and state laws, materials, including wastes, may be considered hazardous if they are specifically listed by statute as such or if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode or generate vapors when mixed with water (reactivity). The term “hazardous material” is defined in law as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment (California Health and Safety Code, Section 25501(o)). In some cases, past industrial or commercial activities on a site could have resulted in spills or leaks of hazardous materials, resulting in soil and/or groundwater contamination. Hazardous materials may also be present in building materials and released during building demolition activities.

3D.2 Existing Environmental Setting

The proposed project is located on a portion of 34 acres of land owned by LAUSD at Tweedy Boulevard and Adella Avenue in South Gate. Prior to the 1930s, land use was primarily agricultural. According to the Health Risk Assessment, the site has been used for a variety of commercial and manufacturing operations since the 1930s including, but not limited to, foundries, machine shops, pesticide production facilities, a paper mill, a trucking terminal, metal plating, and manufacturing plants for various goods (refer to Appendix E).¹ These businesses continued until the 1990s when LAUSD began acquiring the land. Currently, the site is mostly vacant lots with a few buildings still remaining that are used for storage.

The site is on the east and west sides of Adella Avenue followed by commercial and light industrial uses serviced by Atlantic Boulevard; residential development is located to the north, beyond which is Wood Avenue; a strip of commercial, residential, and light industrial development is located to the south, followed by Aldrich Avenue, then more residential development; and the Los Angeles River channel borders the site to the east. Interstate 710 (I-710) is also located approximately 1,130 feet east of the proposed project site. A Union Pacific Railroad spur (Spur No. 810961T) is located directly to the northeast. All remaining structures on

¹ URS Corporation, *Health Risk Assessment for South Region High School #9*, revised ~~July 2008~~ July 2009.

the site, included building foundations and asphalt parking areas, would be removed during construction of the proposed project.

Environmental Investigations

Based on historical releases of hazardous materials, soil and groundwater at the site are contaminated by a variety of hazardous materials formerly used in industrial operations. The California DTSC is overseeing the environmental investigation of the site. DTSC and LAUSD have divided the site into five areas of investigation (also known as Operable Units, or OUs) in order to focus on the specific environmental issues found in each area and to facilitate the cleanup schedule. The soil portion of the site north of Tweedy Boulevard has been designated OU1, the soil portion of the site south of Tweedy Boulevard has been designated OU2, and groundwater throughout the site has been designated OU3. Areas segregated from the project site that are proposed to become streets and parking lots are designated as OU4 and OU5.

The DTSC and the LAUSD signed a School Cleanup Agreement (SCA) in 2005 that authorizes DTSC to oversee the environmental cleanup at the project site. In December 2005, LAUSD initiated an environmental investigation called a Remedial Investigation/Feasibility Study (RI/FS) to identify and define the environmental impacts to soil and groundwater from past industrial uses. During a RI, soil, soil gas, and groundwater samples are collected and analyzed to determine the distribution of chemicals in the subsurface.^{2,3} A risk assessment evaluates potential risks to humans from exposure to the chemicals present. That information defines the amount of cleanup required. The FS evaluates various methods that can be used to clean up the soil and groundwater contamination and to estimate the cost of that cleanup. After a public comment period, a Remedial Action Plan (RAP) is developed and outlines the proposed cleanup activities. The DTSC is responsible for ensuring that site activities are conducted in accordance with state and federal regulations and that environmental cleanup is performed to remove significant health risks prior to future site development.

The RI identified the presence of the following chemicals at the site:⁴

- Petroleum hydrocarbons, including benzene, toluene, ethylbenzene, and xylenes (BTEX) and polycyclic aromatic hydrocarbons (PAHs);
- Metals, including arsenic, hexavalent chromium, and lead;
- Pesticides, including chlordane, 4,4-DDE, and 4,4-DDT;
- VOCs including chlorinated solvents: 1,1-dichloroethane (1,1-DCA), 1,1-dichloroethene (1,1-DCE), 1,4-dioxane, tetrachloroethene (PCE), 1,1,1-trichloroethane (1,1-TCA), trichloroethene (TCE), chloroform, and vinyl chloride.

² Parsons. *Final Preliminary Environmental Assessment, Proposed Southeast Learning Complex, 5246 Tweedy Boulevard, South Gate, California, February 2005.*

³ Parsons. *Draft Operable Unit 1 Feasibility Study Report, Proposed South Region High School #9 and Middle School #4 Site, South Gate, California, Parsons, April 2008.*

⁴ Parsons. *Final Phase 3 Groundwater Operable Unit 3 Monitoring Report, Proposed South Region High School #9 and Middle School #4 Site, South Gate, California, Parsons, January 2008.*

A comprehensive soil sampling program has collected over 1,500 soil samples at the site. Chemical testing of gases in the soil from vapor-phase Volatile Organic Compounds (VOCs) has also been conducted. These investigations have identified various areas of impacted soil that will require removal to achieve environmental cleanup in both OU1 and OU2. This includes various areas of soil impacted by metals such as arsenic, hexavalent chromium, and lead; polychlorinated biphenyls (PCBs); petroleum hydrocarbons; and pesticides. Soil cleanup of OU1 is currently ongoing under DTSC oversight. In general, more areas with elevated levels of VOCs are situated in OU2, south of Tweedy Boulevard. Clean up efforts for soil and soil gas at portions of OU2 will address the VOCs in groundwater, which are considered to be a potentially significant source of the measured soil gas VOC concentrations.⁵ Additional site investigation and review of cleanup technologies, such as temporary soil vapor extraction or on-site treatment, are being considered for OU2. Impacted soils in OU4 will be excavated and removed in order to permanently protect human health and the environment at the project site. The soils in OU5 are not impacted to levels requiring remediation, and as a result cleanup is not required.

Impacts to groundwater (OU3) beneath the site from both offsite and onsite sources have also been identified. Groundwater investigations have included the sampling of over 70 groundwater monitoring wells that have been installed at the site. Groundwater at the site occurs in three separate aquifers designated the “A,” “B,” and “C” zones located at different depths and separated by intervening clay/silt layers. Based on the results of the groundwater investigations and the soil gas investigations, potential historic VOC source release areas have been identified at four of the parcels on the site. Elevated concentrations of VOCs, arsenic, total and hexavalent chromium are present in A-zone wells. VOCs have been detected above the regulatory threshold levels in samples collected from the deeper B and C zone wells. Additional investigations will characterize VOC contamination in the B and C zones as well as initiate evaluation of appropriate cleanup technologies for groundwater. These impacts and sources are being addressed by the DTSC and LAUSD, and the potential remediation alternative includes injecting constituents into the specific wells to reduce the Chemicals of Concern (COC) in the groundwater.

LAUSD is required to comply with applicable regulations pertaining to contaminated soils and groundwater, including California Education Code Section 17213 et seq. **In addition, LAUSD would comply with SCAQMD Rule 1166 (VOC Emissions from Decontamination of Soil), including, but not limited to, development of a VOC soil mitigation plan.** As a result, remaining contamination and associated remediation activities will have no impact on the health and safety of those occupying the area, and site development will not occur prior to removal of existing hazardous materials pursuant to DTSC approval. **The Health Risk Assessment for the proposed project site is provided as Appendix E.**

Proposed Site Remediation

Soil cleanup activities evaluated for the proposed school site on the parcels north of Tweedy Boulevard are described in the Draft OU1 Feasibility Study Report and an Initial Study published

⁵ Parsons. *Draft Phase 2 Soil Gas and VOC Source Characterization Report, Proposed South Region High School #9 and Middle School #4 Site*, South Gate, California, Parsons, November 2007.

by the DTSC. This report identifies the chemicals of concern and the proposed remedial goals to support future school development. Eleven remedial technologies were screened based on standard criteria, such as overall protection of human health and the environment, long-term effectiveness, reduction of toxicity, implementability, cost, and community acceptance. LAUSD subsequently prepared a RAP to identify strategies for removal of the contaminated soil and to ensure that cleanup activities are conducted in accordance with state and federal laws and regulations.

Pipelines

There are two natural gas pipelines and one petroleum product pipeline located within 1,500 feet of the proposed school site. One natural gas pipeline, operated by Southern California Gas Company, is a 26-inch high-pressure pipeline located 42 inches below the ground surface of Atlantic Avenue to the west of the site, approximately 300 feet from the proposed school site at its closest location. There are also two Chevron pipelines, an 8-inch petroleum product pipeline and a 6-inch natural gas pipeline, located in the right-of-way adjacent to and east of the site. These pipelines are situated five to ten feet from the eastern property boundary and 25 to 28 feet from the school site along the western property boundary.⁶ Refer to **Appendix BF** for the Pipeline Hazard Safety Assessment.

3D.3 Applicable Regulations

Federal, state, and local regulations govern the range of hazardous materials issues that may be encountered during environmental cleanup, demolition, construction, and operation of the project area. Various state and local regulatory agencies implement these regulations to minimize the risk to human health and the environment from hazardous materials. This section describes the regulatory process for site investigation and cleanup, hazardous materials and hazardous waste storage and handling, and worker safety.

Soil and Groundwater Cleanup

DTSC oversees environmental review of proposed school sites using a three-step process under its School Property Evaluation and Cleanup Division. After a final site is selected, the first step requires the school district to contract with qualified environmental consultants to prepare a Phase I Environmental Site Assessment (Education Code, Section 17210(b) and Section 17213.1(a)). The school district submits this assessment to DTSC for review, comment, and approval. If the Phase I for the project reveals potential contamination, a Preliminary Environmental Assessment (PEA) is required. The PEA includes environmental sampling and a health risk assessment according to DTSC guidelines (Education Code Section 17213.1(a)(4)(B)). School districts must make the report available for public review and comment before DTSC's final determination. If the assessment identifies no significant health or environmental risks, the school district will receive a "No Further Action" determination letter from DTSC and the process is complete. If the PEA identifies significant contamination, school districts may elect to

⁶ The Planning Center, *Pipeline Safety Hazard Assessment for South Region High School #9*, revised June 2008.

drop the proposed school site from consideration or clean up the contamination under a DTSC Voluntary Cleanup Agreement or School Cleanup Agreement. DTSC follows Health and Safety Code requirements for all response actions, and approval of a Remedial Action Plan is granted after a public comment period. When all necessary cleanup activities are complete to ensure public health and safety, DTSC will certify that “No Further Action” is needed and school development can proceed.

Site remediation or development may also be subject to regulation by other agencies. For example, if dewatering of a hazardous waste site were required during construction, subsequent discharge to the sewer system could require a permit from the Los Angeles Department of Public Works (LADPW), and discharge to the storm water collection system could require a National Pollutant Discharge Elimination System (NPDES) permit from the California Regional Water Quality Control Board (RWQCB). Offsite sources of contamination will be addressed by the DTSC or other appropriate regulatory agency.

School Siting

Under Education Code Section 17251, the CDE has the authority to approve the acquisition of proposed school sites such as the proposed project. CDE’s standards and regulations for the process are presented in CCR Title 5, Sections 14010-14012 and include the requirement that the site not be located near an above-ground water or fuel storage tank or within 1,500 feet of the easement for an above-ground or underground pipeline that can pose a safety hazard as determined by a risk analysis study.

Hazardous Materials and Waste Handling

Excavated soil containing hazardous substances and hazardous building materials would be classified as a hazardous waste if they exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (CCR, Title 22, Division 4.5, Chapter 11, Article 3). State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. These laws and regulations are overseen by a variety of state and local agencies. In the project area, the LADPW Environmental Programs Division is responsible for implementing the Underground Storage Tank (UST) Program. The Los Angeles County Fire Department Health Hazardous Materials Division (LACFD-HHMD) is the Certified Unified Program Agency (CUPA) responsible for implementing the following program elements:

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (Tiered Permitting);
- Aboveground Petroleum Storage Tank Spill Prevention Control and Countermeasure Plan (SPCC);
- Hazardous Materials Release Response Plans and Inventory Program (Hazardous Materials Disclosure or “Community-Right-to Know”);

- California Accidental Release Prevention Program (Cal ARP); and
- Uniform Fire Code Plans and Inventory Requirements.

The laws and regulations that established these programs require that businesses that use or store certain quantities of hazardous materials submit a Hazardous Materials Business Plan that describes the hazardous materials usage, storage and disposal to the local oversight agency (CUPA). Aboveground and underground storage tanks must be properly permitted. The County may perform inspections and issue citations to businesses not in compliance with these regulations.

Hazardous Materials Transportation

The United States Department of Transportation regulates hazardous materials transportation on all interstate roads. Within California, the state agencies with primary responsibility for enforcing federal and state regulations and for responding to transportation emergencies are the California Highway Patrol and the California Department of Transportation. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications. Although special requirements apply to transporting hazardous materials, requirements for transporting hazardous waste are more stringent, and hazardous waste haulers must be licensed to transport hazardous waste on public roads. The RAP prepared for the site also includes a transportation plan for approved removal actions conducted under the oversight of DTSC.

Worker Safety

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the work place. The California Division of Occupational Safety and Health (Cal/OSHA) and the federal Occupational Safety and Health Administration (OSHA) are the agencies responsible for assuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. At sites known or potentially contaminated, a Site Safety Plan must be prepared. The Site Safety Plan establishes policies and procedures to protect workers and the public from exposure to potential hazards at the contaminated site.

Emergency Response

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local government, and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including the Cal EPA, CHP, the California Department of Fish and Game, the RWQCB, and the local fire department. The Los Angeles County Fire Department provides first response capabilities, if needed, for hazardous materials emergencies within the project area.

3D.4 Impacts and Mitigation

This section presents the potentially significant impacts related to hazards and hazardous materials carried forward from the Initial Study, analyzes these impacts in more detail, and presents mitigation measures, as needed, to reduce potentially significant impacts to less than significant levels.

Methodology

This impact analysis focuses on potential effects of development of a school on a site with known hazardous materials contamination in soil and groundwater. In addition, the analysis evaluates pipelines and propane tanks with the potential to pose a safety hazard. The evaluations herein are made in light of current conditions at the site, the proposed building plans, the status of the RI/FS process, and applicable environmental regulations and guidelines.

Criteria for Determining Significance

The DTSC PEA guidance provides *de minimis* values for evaluating impacts during a PEA screening evaluation of one in one million (1.0E-06) excess lifetime cancer risks for exposure to carcinogenic chemicals. According to this guidance, additional site investigation and remediation is warranted if the risk estimate is above this level.

LAUSD has developed screening and quantitative risk analysis procedures for evaluating safety hazards associated with natural gas and hazardous liquid releases from pipelines that lie within 1,500 feet of a school site.⁷ The LAUSD significance threshold level of one in one million (1.0E-06) fatality is typically used for this evaluation. If the estimated risk is greater than one in one million, mitigation measures or design features that will reduce the risk must be developed.

Project Impacts

Impact 3D-1: Located on a site that is (a) a current or former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries hazardous substances, acutely hazardous materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood.

Less Than Significant Impact. As described above in Section 3D.2, the proposed school site is located on a former industrial property that has been impacted by historical releases of a variety of chemicals, including petroleum hydrocarbons, metals, pesticides, and VOCs. Extensive soil and groundwater investigations have been performed at the site to evaluate the nature and extent of contamination under the oversight of DTSC. As the regulatory agency overseeing the site, the DTSC is responsible for ensuring that all applicable laws and regulations are followed and that

⁷ CDE. *Pipeline Safety Hazard Assessment User Manual*, 2005.

site cleanup will reduce the potential risk to humans from exposure to chemicals to a less-than-significant level prior to allowing development on the site.

Impacted soil within OU 1 is currently being addressed through the implementation of a DTSC-approved RAP. Excavation and off-Site removal was the selected cleanup approach. Approximately 40,000 cubic yards of soil impacted by arsenic, lead, PCBs, petroleum hydrocarbons, and PCE is being excavated and removed under DTSC oversight. The site work is ongoing and scheduled for completion in August 2009. Environmental clearance from DTSC is expected by October 2009. **LAUSD has determined that the potential soil excavation at the site would include soils classified as a hazardous waste due to the presence of chemicals including petroleum hydrocarbons in the soil. LAUSD would comply with SCAQMD Rule 1166 (VOC Emissions from Decontamination of Soil), including, but not limited to, development of a VOC soil mitigation plan.**

Based on careful analysis of the options, LAUSD has determined that the impacted soil in OU 4 be excavated and removed in order to permanently protect human health and the environment at the Site. The contaminated soil in the upper one to three feet beneath the area proposed to become future streets will be removed using a backhoe, bulldozer, shovels or other types of earth-moving equipment. The soil will either be loaded directly onto trucks and taken off-site for disposal at a licensed facility, or be stockpiled at the Site for a short time before removal. After the cleanup process is complete, a Removal Action Completion Report will be submitted to DTSC for review and approval. Property ownership of OU 4 is intended to be transferred to the City of South Gate for use as public streets and parking lots. Trucks will transport approximately 3,000 cubic yards of contaminated soil to a licensed disposal facility.

It is currently anticipated that environmental clearance for OUs 4 and 5 would occur in late 2009.

It is anticipated that the remedial investigation/feasibility study (RI/FS) reports for OU2 would be submitted to DTSC in the third quarter of 2009. The OU 2 FS will evaluate various technologies to address the impacted soil and soil gas. Based on an evaluation of the alternatives, LAUSD will identify a preferred remedy for DTSC concurrence. A RAP will be prepared and submitted to DTSC and circulated for public review. A public meeting will be held to solicit community input on the preferred remedy. Upon DTSC concurrence, the RAP will be implemented starting in early 2010. It is estimated that up to 300,000 cubic yards of impacted soil will need to be remediated in OU 2. Environmental clearance for OU 2 is anticipated by approximately 2012.

OU 3 (Site-wide groundwater) is being addressed through ongoing monitoring and testing of the groundwater and evaluation of various cleanup approaches. Bench-scale treatability studies of various technologies will be evaluated to help identify the best cleanup approach. It is anticipated that the RI/FS reports for OU3 would be submitted to DTSC in late 2009. The FS will carefully evaluate various approaches to cleaning up Site groundwater. A RAP will be prepared for DTSC review and concurrence and associated public participation activities will be conducted. The RAP will then be implemented and a timeframe for groundwater cleanup provided. Long-term groundwater monitoring will likely continue at the Site for a number of years to ensure that the remedy is effective.

The potential impact from exposure to hazardous materials in soil and groundwater, and hazardous vapors emanating from impacted soil and groundwater, is less than significant, since LAUSD is required to comply with California Education Code Section 17213 et seq, according to which site development will not occur prior to removal of existing hazardous materials pursuant to DTSC approval.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

Impact 3D-2: Located within 1,500 feet of a pipeline that may pose a safety hazard.

Less Than Significant Impact. As described above, two natural gas pipelines and one petroleum product pipeline are located within 1,500 feet of the proposed school site. A 26-inch natural gas pipeline is located approximately 300 feet to the west of the site, an 8-inch petroleum product pipeline and a 6-inch natural gas pipeline are located approximately 25 feet from the site, based on the current design plans for the school (which makes a portion of the school site closest to the Chevron right-of-way inaccessible to students and staff). A pipeline safety hazard assessment was conducted according to CDE's *Pipeline Safety Hazard Assessment User Manual*⁸ to evaluate the potential safety hazard from these pipelines. Two potential accident scenarios involving a pipeline release were considered: 1) a rupture or large volume release equal to the pipeline's diameter or 2) a leak or small volume release from a 1-inch diameter hole. The potential consequences for each accident scenario included jet flame, radiant heat, flammable vapor cloud flash fire, unconfined vapor cloud explosion, and product pool width. Because one or more of these hazards would reach the school site and cause fatalities in the event of a pipeline rupture and, in some cases, a pipeline leak, quantitative risk analysis modeling was performed. Refer to **Appendix BF** for the Pipeline Safety Assessment.

The quantitative risk analysis considered meteorological data; pipeline accident rates; the pipeline length near the school; school attendance time; and the probability of fatality from exposure to jet flame, radiant heat, flammable or unconfined vapor clouds to estimate the calculated risk for each accident scenario. The estimated fatality risk for each pipeline was calculated as follows:

- 26-inch natural gas pipeline 1.2E-07
- 8-inch Chevron petroleum product pipeline 9.9E-07
- 6-inch Chevron natural gas pipeline 1.5E-07

The total combined fatality risk for all three pipelines is 1.3E-06. Since the calculated risk exceeds one in one million (1.0E-06), the safety risk is above the threshold of significance, and mitigation measures or design features are required.

⁸ CDE, *Pipeline Safety Hazard Assessment User Manual*, 2005.

The design of the school includes the installation of a standard 6-inch curb along the eastern boundary of the school site. According to the hazard assessment prepared for the proposed project, this curb (located adjacent to the pipeline right-of-way) would prevent released petroleum product from flowing onto the school site and would reduce the time for formation of a flammable vapor cloud, because the petroleum product would discharge to a storm drain located at Tweedy Boulevard. Installation of curbing is calculated to reduce the estimated fatality risk for the 8-inch Chevron petroleum pipeline to 5.1E-07, and the total combined fatality risk to 7.8E-07, which is below the significance threshold of one in one million. Therefore, impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Impact 3D.3: Located on a site that contains, or is near, propane tanks that can pose a safety hazard.

Less Than Significant Impact. Most of the former industrial buildings located on the site have been removed, and only a few storage buildings remain on-site. It is possible that there is a propane tank associated with one of the existing buildings that could pose a safety hazard if improperly handled. Because all site buildings and facilities, including tanks, will be removed under the oversight of the DTSC prior to school development, potential safety hazards related to propane tanks are less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Impact 3D.4: Located on a site where the property is near a Electro-Magnetic Fields (EMF) Source, such as a powerline or radio frequency transmission facility.

(Less Than Significant Impact). The playfields proposed to the south of the main campus are located adjacent to a radio frequency transmission facility. A survey was conducted on the site and in the adjacent neighborhood to determine the radiofrequency (RF) EMF levels from this tower. RF levels detected onsite, near the tower, are equal to, or slightly higher than background levels found in the neighborhood. The Federal Communication Commission (FCC) is the regulatory agency responsible for setting health protective thresholds for cellular antennas and have set a safety threshold of 1,000 microwatts/centimeter² ($\mu\text{W}/\text{cm}^2$). RF levels onsite were measured to be between 0.065 $\mu\text{W}/\text{cm}^2$ and 1.296 $\mu\text{W}/\text{cm}^2$ (see Appendix G). No further studies are required.

Additionally, one 66 kV power line has been identified adjacent to the southern boundary of the project site. In order to comply with California Department of Education setbacks, a 100-foot buffer will be incorporated into the site design. Power line impacts will be less than significant after incorporation of this setback.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

3D.5 Cumulative Impacts

Impact 3D.5: Result in a cumulatively considerable hazard or hazardous materials impact.

Less Than Significant Impact. With the recommended design, the proposed project would have a less-than-significant hazardous materials impact to the public or the environment within the vicinity of the project area. Other foreseeable development within the area, although likely increasing the potential to disturb existing contamination and the handling of hazardous materials, would be required to comply with the same regulations as the proposed project. This includes federal and state regulatory requirements for transporting (Cal EPA and Caltrans) hazardous materials or cargo (including fuel and other materials used in all motor vehicles) on public roads or disposing of hazardous materials (Cal EPA, DTSC, LACPHD). Therefore, the effect of the proposed project on hazardous materials, in combination with other foreseeable projects, would not be significant.

Mitigation Measures

None required.

Residual Impacts

Impacts would be less than significant.

SECTION 3E

Noise

3E.1 Introduction

This chapter presents information on ambient noise conditions in the vicinity of the proposed project site and identifies potential impacts associated with noise and vibration due to the construction and operation of the proposed project, including potential effects on the prospective students and employees. *Noise monitoring results are provided as Appendix H of this August 2009 FEIR.*

Noise

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise can be defined as unwanted sound. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level has become the most common descriptor used to characterize the loudness of an ambient sound level. The decibel (dB) scale is used to quantify sound intensity. Since the human ear is not equally sensitive to all frequencies within the entire spectrum, noise measurements are weighted more heavily within those frequencies of maximum human sensitivity in a process called “A-weighting,” referred to as dBA. In general, a difference of more than three dBA is a perceptible change in environmental noise, while a five dBA difference typically causes a change in community reaction. An increase of 10 dBA is perceived by people as a doubling of loudness.¹

Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Therefore, the cumulative noise level from two or more sources will combine logarithmically, rather than linearly (for example, simple addition). In other words, if two identical noise sources produce a noise level of 50 dBA each, the combined noise level would be 53 dBA, not 100 dBA.

Time variation in noise exposure is typically expressed in terms of the average energy over time (Leq), or alternatively, as a statistical description of the sound level that is exceeded over some fraction of a given period of time. For example, the L₅₀ noise level represents the noise level that is exceeded 50 percent of the time – half the time the noise level exceeds this level and half the time the noise level is less than this level. L₅₀ is also representative of the level that is exceeded

¹ USEPA, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March 1974.

30 minutes in an hour. Similarly, the L_8 and L_{25} represent the noise levels that are exceeded eight and 25 percent of the time, respectively, or for five and 15 minutes during a one-hour period, respectively.

Several methods have been devised to relate noise exposure over time to human response. A commonly used noise metric for this type of study is the Community Noise Equivalent Level (CNEL). The CNEL, originally developed for use in the California Airport Noise Regulation, adds a five dBA penalty to noise occurring during evening hours from 7 PM TO 10 PM, and a ten dBA penalty to sounds occurring between the hours of 10 PM and 7 AM to account for the increased sensitivity to noise events that occur during the quiet late evening and nighttime periods. Thus, the CNEL noise metric provides a 24-hour average of A-weighted noise levels at a particular location, with an evening and a nighttime adjustment, which reflects increased sensitivity to noise during these times of the day.

The day-night noise level (L_{dn}) is the energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10 PM and 7 AM. L_{dn} and CNEL values are generally considered to be equivalent and are treated as such in this assessment.

Typical Environmental Noise Levels

Noise levels are generally considered low when they are below 45 dBA, moderate in the 45 dBA to 60 dBA range, and high above 60 dBA. Although people often accept the higher levels associated with very noisy urban residential and residential-commercial zones (above 60 dBA) as well as industrial areas (65 to 70 dBA), they nevertheless are considered adverse noise levels.

Lower noise levels are more expected in rural or suburban areas than in commercial or industrial zones. Nighttime ambient levels in urban environments are about seven decibels lower than the corresponding average daytime levels. The day-to-night difference can be less in rural areas away from roads and other human activity. Areas with full-time human occupation that are subject to nighttime noise that does not decrease relative to daytime levels are often considered objectionable. Noise levels above 45 dBA at night can result in sleep interference. **Table 3E-1**, below, shows typical sound levels from common sources and how L_{dn} varies in different areas.

The normal range of conversation is between 34 and 66 dBA. Between 70 and 90 dBA, sound is distracting and presents an obstacle to conversation, thinking, or learning. Above 90 dBA, sound can cause permanent hearing loss.²

Noise levels from any source will naturally diminish as the sound radiates outward over increasing distance and is absorbed or dissipated into the air. As a rule of thumb, for a stationary noise source, the noise level is reduced by at least 6 dBA for each doubling of distance from the source. Other factors such as the weather and reflecting or shielding also help intensify or reduce noise levels at any given location. Noise levels may also be reduced by intervening structures.

² CDE, School Facilities Planning Division, *School Site Selection and Approval Guide*, October, 2004.

**TABLE 3E-1
TYPICAL SOUND LEVELS**

Common Sounds	A-Weighted Sound Level in Decibels	Subjective Impression
Oxygen Torch	120	Pain Threshold
Rock Band	110	
Ambulance Siren at 100 feet	90	Moderately Loud
Garbage disposal	80	
Vacuum Cleaner at 10 feet	70	
Air Conditioner at 100 feet	60	
Quiet Urban Daytime	50	Quiet
Quiet Urban Nighttime	40	
Bedroom at Night	30	
Recording Studio	20	Just Audible
	10	Threshold of Hearing
	0	

SOURCE: Aviation Planning Associates, *Calculations of Maximum A-weighted Sound Levels (dBA) Resulting from Civil Aircraft Operations*, 1978.

Generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA. Exterior noise levels can normally be reduced by 12 dBA inside buildings constructed with no special noise insulation.³

Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.⁴ Typically, groundborne vibration generated by human activities rapidly attenuates with distance from the source of the vibration. Human-produced vibration issues are, therefore, usually confined to short distances (for example, 500 feet or less) from the source.

³ U.S. Department of Housing and Urban Development (HUD), *Noise Guidebook*, 1985.

⁴ FTA, *Transit Noise and Vibration Impact Assessment*, May 2006.

3E.2 Existing Environmental Setting

Existing Noise Sources

The predominant noise source in the project area is roadway noise from the surrounding roadway network and train tracks located east of the site. Other community noise sources include incidental noise from nearby residences (for example, landscaping activity and domestic animals), pedestrians, and aircraft over-flights.

Noise monitoring was conducted on May, 21, 2007 to ascertain the existing ambient daytime noise levels at nearby sensitive receptors. The measurement locations, along with sensitive receptor locations, are presented in **Figure 3E.1**. A summary of noise measurement data is provided in **Table 3E-2**. As shown on the table, ambient noise levels near the proposed project site ranged from 59.8 to 70.1 dBA L_{eq} (for 5 minutes).

**TABLE 3E-2
MEASURED AMBIENT NOISE LEVELS ON AND SURROUNDING PROJECT SITE**

Location	Start Time	Duration	Exterior Existing (dBA, L_{eq})	Existing Noise Sources
A – End of Tweedy Blvd near railroad tracks	12:00 AM	24 Hour CNEL 62 dBA	Hourly Average L_{eq} 's ranged from: 54 - 62	Unattended noise measurements do not specifically identify noise sources.
B – 5179 Wood Ave	9:26 AM	5 minutes	51	Plane: 56 dB Car: 61 dB No notable noise: 45 dB
C – NE corner of Atlantic Ave and Wood Ave	9:39 AM	5 minutes	71	Truck: 81 dB School Children Traffic on Atlantic Ave No notable noise: 58 dB
D – Adella Ave and Tweedy Blvd	10:00 AM	5 minutes	55	Car: 69 dB Plane: 58 dB Nearby Property: 54 dB
E – 5242 Aldrich Rd	10:10 AM	5 minutes	53	Car: 64 dB Birds: 45 dB Dog: 53 dB

Notes: dBA: A-weighted decibel.
 L_{eq} : Equivalent sound level.

SOURCE: ESA, On-site Reconnaissance and Noise Monitoring, 2008e.

To further characterize existing noise levels in the project area, noise from street traffic during the PM peak-hour in the project area was modeled using the Federal Highway Administration Traffic Noise Prediction Model and traffic volumes provided in the traffic study.⁵ Table 3E-3 summarizes traffic noise modeling results for the existing conditions.

⁵ USFHA, *Traffic Noise Prediction Model (FHWA-RD-77-108)*, December 1978.



As shown in **Table 3E-3**, the calculated CNEL for the analyzed roadway segments as a result of existing traffic volumes ranged from 53 to 72 dBA CNEL at a distance of 50 feet.

**TABLE 3E-3
SUMMARY OF TRAFFIC MODELING FOR EXISTING CONDITIONS**

Roadway Segment	CNEL at 50 Feet from Right-Of-Way
Atlantic Ave north of Firestone Blvd	71
Atlantic Ave south of Firestone Blvd	68
Firestone Ave east of Atlantic Blvd	72
Firestone Ave west of Atlantic Blvd	71
Rayo Ave north of Firestone Ave	59
Rayo Ave south of Firestone Ave	67
Firestone Ave east of Rayo Ave	71
Firestone Ave west of Rayo Ave	69
Atlantic Ave north of Southern Ave	69
Atlantic Ave south of Southern Ave	70
Southern Ave east of Atlantic Ave	65
Southern Ave west of Atlantic Ave	66
Rayo Ave north of Southern Ave	67
Rayo Ave south of Southern Ave	63
Southern Ave east of Rayo Ave	59
Southern Ave west of Rayo Ave	64
Adella Ave south of Southern Ave	54
Southern Ave east of Adella Ave	57
Southern Ave west of Adella Ave	59
Atlantic Ave north of Wood Ave	71
Atlantic Ave south of Wood Ave	71
Wood Ave east of Atlantic Ave	56
Pinehurst Ave south of Tweedy Blvd	54
Tweedy Blvd east of Pinehurst Ave	68
Tweedy Blvd west of Pinehurst Ave	68
Atlantic Ave north of Tweedy Blvd	71
Atlantic Ave south of Tweedy Blvd	71
Tweedy Blvd east of Atlantic Ave	56
Tweedy Blvd west of Atlantic Ave	68
Atlantic Ave north of Chakemco St	70
Atlantic Ave south of Chakemco St	70
Chakemco St east of Atlantic Ave	53
Atlantic Ave north of Wright Rd	70
Atlantic Ave south of Wright Rd	68
Wright Rd east of Atlantic Ave	66
Atlantic Ave north of Michigan Ave	69
Atlantic Ave south of Michigan Ave	69
Michigan Ave east of Atlantic Ave	61
Michigan Ave west of Atlantic Ave	60

SOURCE: KOA Corporation, *Traffic Impact Study for LAUSD South Regional Middle School No. 4 and High School No. 9*. 2008.

Existing Vibration Sources

Similar to the environmental setting for noise, the vibration environment is dominated by traffic-related vibration along nearby roadways. Heavy trucks can generate groundborne vibrations that vary depending on vehicle type, weight, and pavement conditions. Heavy trucks typically operate on major streets. Existing groundborne vibration in the project vicinity is largely related to heavy truck traffic on Atlantic Avenue and a railroad located to the east of the site. No major vibration sources exist in close proximity to the proposed project site. As such, vibration levels at the proposed project site are not typically perceptible.

Sensitive Receptors

Noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise. Figure 3B-2 shows the location of sensitive receptors near the proposed project site. As shown, the surrounding land uses to the north and south consist of predominately single-family residences. Specifically, the residential land uses that abut the northern boundary of the project site would be most impacted. Most construction activity would occur on the northern portion of the site, where the school facilities would be constructed. In addition, noise from operations would be more intense on the north campus, where school operations, play fields, parking facilities, and faculty parking would occur. The grading required to develop the play fields proposed on the south would be minimal in comparison, and occasional operation of the play fields would not be as intense as compared to the north campus.

Vibration sensitive land uses include fragile/historic buildings, commercial buildings where low ambient vibration is essential for operations within the buildings (for example, computer chip manufacturers and hospitals), and buildings where people sleep. Vibration-sensitive receptors near the proposed project site are identical to the noise-sensitive receptors presented above.

3E.3 Applicable Regulations

Noise

No federal noise regulations directly apply to the Program. Certain federal programs, however, influence the audible landscape. Most transportation-related sources of noise are within federal jurisdiction. Vehicle noise emissions standards and requirements for mufflers are set by the USEPA, but are normally enforced locally to avoid potential conflicts.⁶ The Federal Highway Administration (FHWA) requires abatement of highway traffic noise for highway projects.⁷ The Federal Transit Administration (FTA) recommends noise and vibration assessments for mass

⁶ USEPA, 49 CFR 190.

⁷ FHWA, 23 CFR 772.

transit projects through comprehensive guidelines.⁸ For transportation projects that trigger abatement requirements, the normal result is to shield the existing buildings from traffic noise with sound walls or retrofitted noise insulation. The FHWA criteria specify that noise abatement should be provided if a highway project would cause exterior noise levels at any affected school to approach or exceed 67 dBA $L_{eq(h)}$ or 70 dBA L_{10} . **Table 3E-4** provides examples of protective noise levels recommended by the USEPA.

TABLE 3E-4
SUMMARY OF NOISE LEVELS IDENTIFIED AS REQUISITE TO PROTECT PUBLIC HEALTH AND WELFARE WITH AN ADEQUATE MARGIN OF SAFETY

Effect	Level	Area
Hearing Loss	L_{dn} (24) < 70 dB	All Areas
Outdoor Activity Interference and Annoyance	L_{dn} < 55 dB	Outdoors in residential areas and farms and other areas where people spend widely varying amounts of time and other places in which quiet is a basis for use.
	L_{dn} (24) < 55 dB	Outdoor areas where people spend limited amounts of time, such as school yards, playgrounds.
Indoor Activity Interference and Annoyance	L_{dn} < 45 dB	Indoor residential areas.
	L_{eq} (24) < 45 dB	Other indoor areas with human activities such as schools.

SOURCE: U.S. Environmental Protection Agency (USEPA), *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, March, 1974.

CDE Regulations. The CDE requires all school districts to select school sites that provide safety and support learning.⁹ Because the CDE recognizes that unwanted sound can be distracting and can present an obstacle to learning, the CDE requires the school district to consider noise in the site selection process.¹⁰ The School Site Selection and Approval Guide document recommends that this be accomplished with an assessment of noise from major roadways and railroads during environmental review of school construction.¹¹ If the LAUSD considers a potential school site near a freeway or other source of noise, CDE recommends hiring an acoustical engineer to determine the level of sound that the location is subjected to and to assist in designing the school.¹² The American Speech Language-Hearing Association (ASLHA) guidelines recommend that in classrooms sounds dissipate in 0.4 second or less (and not reverberate) and that background noise not rise above 30 dBA.¹³

California Standards for Noise-Compatible Land Uses. The Governor's OPR recommends that local jurisdictions follow consistent guidelines for determining the compatibility of land uses

⁸ USDOT, FTA: *Noise and Vibration Impact Guideline*, May 2006,.

⁹ California Department of Education (CDE), Regulations (CCR Tit. 5, Div. 1, Ch. 13 Subchapter 1, Article 2 §14010 "Standards for School Site Selection").

¹⁰ CDE Regulations (CCR Tit. 5, Div. 1, Ch. 13 §14010(q)).

¹¹ CDE, School Facilities Planning Division, *School Site Selection and Approval Guide*, March 2001.

¹² *Ibid.*

¹³ *Ibid.*

with respect to noise.¹⁴ Noise-compatible land use planning depends on the ability to locate noise-sensitive land uses in an acceptable environment. **Figure 3E-2** provides the state’s noise-land use compatibility matrix. As shown, exterior noise environments are “normally acceptable” for schools and residences if they are below 60 dBA L_{dn} and “conditionally acceptable” below 70 dBA L_{dn} . A “conditionally acceptable” designation implies that new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are incorporated in the design of the new land use. By comparison, a “normally acceptable” designation indicates that standard construction can occur with no special noise reduction requirements.

City of South Gate Noise Ordinance. The City's Municipal Code establishes regulations regarding allowable increases in noise levels. In accordance with Section 11.29 of the City's Municipal Code, it is unlawful for any person to willfully make or continue, cause or to allow on his property, a loud, unnecessary or unusual noise (including animal noises, e.g., dog barking) that disturbs the peace and quiet of any neighborhood or which causes any discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. Section 11.29.160 provides maximum permissible sound levels by receiving land use (e.g., residential) and Section 11.29.180 provides prohibitions of specific activities, including amplifying sound (Section 11.29.180 paragraph 2). In general, a noise violation is considered if the noise exceeds the ambient noise by 5 dBA or more. The City of South Gate Department of Building and Safety enforces noise ordinance provisions relative to equipment, and the South Gate Police Department enforces provisions relative to noise generated by people.

Los Angeles Unified School District (LAUSD) Noise Standards. LAUSD has established noise standards (see **Table 3E-5**) to protect students and staff from noise impacts generated by traffic in terms of L_{eq} .¹⁵ These standards were established based on regulations set forth by the Caltrans and the City of Los Angeles. LAUSD has indicated that a three dBA L_{dn} increase would represent a permanent increase in ambient noise levels when projected ambient noise levels (ambient noise levels after implementation of the proposed project) would exceed acceptable noise levels as adopted by local agency noise ordinances or general plan goals.¹⁶ LAUSD has also indicated that a substantial temporary significant noise increase would result from activity that generates noise levels above 75 dBA when measured at a distance of 50 feet when near a sensitive receptor.¹⁷

¹⁴ State of California, Governor's OPR, *General Plan Guidelines, Appendix A, Noise Element Guidelines*, November 1998.

¹⁵ LAUSD, OEHS, *New School Construction Program, Final PEIR*, published May 2004, Board Certified June 8, 2004, p. 3.3-7.

¹⁶ *Ibid.*, p. 3.3-7.

¹⁷ *Ibid.*

**FIGURE 3E.2
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENT**

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE - Ldn or CNEL (dBA)							
	50	55	60	65	70	75	80	
Residential – Low Density Single Family, Duplex, Mobile Home								
Residential – Multi-Family								
Transient Lodging – Motel/Hotel								
Schools, Libraries, Churches, Hospitals, Nursing Homes								
Auditorium, Concert Hall, Amphitheaters								
Sports Arena, Outdoor Spectator Sports								
Playgrounds, Neighborhood Parks								
Golf Courses, Riding Stables, Water Recreation, Cemeteries								
Office Buildings, Business, Commercial and Professional								
Industrial, Manufacturing, Utilities, Agriculture								

	Normally Acceptable	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements
	Conditionally Acceptable	New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
	Normally Unacceptable	New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.
	Clearly Unacceptable	New construction or development generally should not be undertaken.

SOURCE: State of California, Governor's Office of Planning and Research, *General Plan Guidelines*. 1998.

**TABLE 3E-5
ACCEPTABLE OPERATIONAL NOISE LEVELS ESTABLISHED BY LAUSD**

Location	L₁₀ Noise Level	Leq Noise Level
Exterior	70 dBA	67 dBA
Interior	55 dBA	45 dBA

SOURCE: LAUSD, OEHS. *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*, Published May 2004. Board Certified June 8, 2004, p. 3.3-7.

Vibration

Neither the City of South Gate nor LAUSD have specific thresholds for vibration impacts. Generally, well-engineered buildings (as opposed to fragile buildings) can be exposed to groundborne vibration levels of 0.2 inch per second PPV without experiencing structural damage.¹⁸

3E.4 Impacts and Mitigation

Methodology

Construction and operational point source noise impacts were evaluated by comparing anticipated noise levels to the guidelines set forth in the City of South Gate Municipal Code and LAUSD's PEIR. Roadway noise impacts were projected using the FHWA-RD-77-108 prediction model. This methodology allows the user to define roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to the proposed project was calculated and compared to baseline noise levels that would occur under the "no project" condition to determine significance.

Groundborne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

Criteria for Determining Significance

The criteria used to determine the significance of an impact related to noise are based on Appendix G of the *CEQA Guidelines*. The proposed project may result in a significant noise impact if it would:

- Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;
- Expose persons to or generate excessive groundborne vibration or groundborne noise levels;

¹⁸ United States Bureau of Mines, *Bulletin 656 (Blasting Vibrations and Their Effects on Structures)*, 1971.

- Result in a permanent increase of over three (3) dBA L_{dn} in ambient noise levels where existing ambient noise levels, or the projected ambient noise level after implementation of the project, would exceed acceptable noise levels as adopted in local agency noise ordinances or general plan goals;¹⁹
- Result in a temporary or periodic increase in ambient noise levels above 75 dBA when measured at a distance of 50 feet from school-related activity or other sensitive receptors within 500 feet of the proposed project site;²⁰ or
- Result in a cumulatively considerable impact with respect to noise.

Project Impacts

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A of the DEIR 2008).

Impact 3E.1: Expose persons to or generation of noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.

Construction

Significant and Unavoidable with Mitigation Incorporated. Noise impacts from construction activities occurring within the proposed project site would be a function of the noise generated by construction equipment, the equipment location, and the timing and duration of the noise-generating activities. Construction activities would include four stages: (1) demolition and grading; (2) foundations; (3) construction; and (4) finishing. Each stage involves the use of different kinds of construction equipment and, therefore, has its own distinct noise characteristics. As mentioned earlier, construction activities would be limited and would not occur within noise sensitive hours (10 PM to 7 AM). The anticipated noise level associated with each construction phase is listed in **Table 3E-6**. Additionally, typical noise levels generated by individual pieces of equipment are displayed in **Table 3E-7**.

**TABLE 3E-6
ESTIMATED NOISE LEVELS FROM CONSTRUCTION ACTIVITIES**

Construction Phase	Noise Level (dBA, L_{eq} ^a)
Demolition	84
Excavation	89
Footings	101
Construction	85
Finishing	89

^a Average noise levels correspond to a distance of 50 feet from the noisiest piece of equipment associated with a given phase of construction and 200 feet from the rest of the equipment associated with that phase.

SOURCE: Bolt, Baranek, and Newman. *Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances*, 1971.

¹⁹ LAUSD, OEHS, *New School Construction Program*, Final PEIR, published May 2004, Board Certified June 8, 2004, p. 3.3-7.

²⁰ *Ibid.* p. 3.3-7.

**TABLE 3E-7
NOISE LEVELS FROM TYPICAL CONSTRUCTION EQUIPMENT**

Equipment Type	Quieted Equipment at 50 ft. (in dBA)	Quieted Equipment at 100 ft. (in dBA)	Quieted Equipment at 200 ft. (in dBA)
Air Compressor	71	65	59
Backhoe	80	74	68
Concrete Pump	80	74	68
Concrete Vibrator	70	64	58
Concrete Breaker	75	68	62
Truck Crane	80	74	68
Generator	71	65	59
Loader	80	74	68
Paver	80	74	68
Pneumatic Tools	70	64	58
Water Pump	75	68	62
Power Hand Saw	80	74	68
Shovel	71	65	59
Trucks	83	77	71

SOURCES: Bolt, Beranek, and Newman, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, U.S. Environmental Protection Agency, 1971. USDOT, Federal Transit Administration: Noise and Vibration Impact Guideline, May, 2006.

The construction noise levels presented in Table 3E-6 represent worst-case conditions in which the maximum amount of construction equipment would be operating during a one-hour period. These estimated maximum noise levels would not be continuous, nor would they be typical of noise levels throughout the construction period. As indicated in Table 3E-6, due to the type of construction equipment, the highest level of construction noise would be expected to occur during the installation of footings. The pile-driving phase is anticipated to generate a noise level of approximately 101 dBA at a reference distance of 50 feet from the center of construction activity.

Table 3E-7 shows construction noise using quieted or muffled equipment at various distances from the construction activity.

Most construction activity would be located 50 feet or more away from residential structures given the setbacks of the residences themselves from their property line and the setback of the buildings being constructed. Construction-related noise levels decline or lessen at a rate of six dBA for every “doubling” of distance between the noise source and receptor. **Table 3E-8** provides further information regarding exterior construction noise levels at different distances.

Exterior construction-related noise levels are shown in **Table 3E-9**. As shown, exterior construction noise levels would range from 61 dBA L_{eq} to 104 dBA L_{eq} . At these levels construction noise would exceed LAUSD’s limit of 75 dBA for temporary noise. It is important to note that construction activity would occur for short-time periods during the day and would not occur within noise sensitive hours (10 PM to 7 AM).

**TABLE 3E-8
ATTENUATION OF CONSTRUCTION NOISE LEVELS AWAY FROM PROPOSED PROJECT SITE**

Distance (feet)	Noise Levels (dBA, L _{eq})
50	76-101
100	70-95
200	64-89
400	58-83
800	52-77

SOURCE: Cunniff, *Environmental Noise Pollution*, 1977; U.S. Department of Transportation Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

**TABLE 3E-9
EXTERIOR CONSTRUCTION NOISE LEVELS**

Noise Receptor	Distance (Feet) ^a	Maximum Construction Noise Level (dBA, Leq) ^b	Temporary Sound Barrier Attenuation (dBA, Leq)	Temporary Significance Threshold	Significant (Yes/No)
Residences – Wood Avenue Building construction	50	85	80	75	Yes
Residences – Wood Avenue Site boundary grading	5	109	104	75	Yes
Residences – Wood Avenue Pile driving at buildings	50	101	96	75	Yes
Residences – Aldrich Road Building construction	825	61	NA	75	No
Residences – Aldrich Road Site boundary grading	50	85	NA	75	Yes
Residences – Aldrich Road Pile driving at buildings	825	77	NA	75	Yes

^a Distance of noise source to receptor.

^b Construction source's noise level at receptor location, with distance adjustment

^c Pre-construction ambient noise level at receptor location.

NA = Not Applicable

SOURCE: ESA, 2008e.

Interior construction-related noise levels are shown in **Table 3E-10**. Typical building construction provides a noise reduction of approximately 12 dBA with windows open and a minimum 26 dBA with windows closed.²¹ As shown, interior construction noise levels at sensitive receptors would range from 25.0 to 78 dBA L_{eq}.

²¹ American Society for Testing of Materials, *Standard Classification for Determination of Outdoor-Indoor Transmission Class*, 2003.

**TABLE 3E-10
INTERIOR CONSTRUCTION NOISE LEVELS**

Noise Receptor	Maximum Exterior Noise Level (dBA, Leq)	Maximum Interior Noise Level (dBA, Leq)	Temporary Sound Barrier Attenuation (dBA, Leq)
Residences – Wood Avenue Building construction	85	59	54
Residences – Wood Avenue Site boundary grading	109	83	78
Residences – Wood Avenue Pile driving at buildings	101	72	67
Residences – Aldrich Road Building construction	61	35	NA
Residences – Aldrich Road Site boundary grading	109	83	78
Residences – Aldrich Road Pile driving at buildings	77	51	NA

^a Assumes windows closed condition.
NA = Not Applicable

SOURCE: ESA, 2008e.

In order to reduce temporary construction noise impacts to off-site receptors, LAUSD would require its construction contractor to implement LAUSD BMPs (listed as Mitigation Measures NOI-1 through NOI-4), however, even with the implementation of these measures, this impact would be considered significant and unavoidable for construction noise.

Operation (non-vehicular)

Non-vehicular operational activities associated with the proposed project that would generate noise include student activity on-site (especially within the football and baseball ~~stadiums~~fields), bells, and alarms. These sources would be limited to school hours. The sports fields ~~football and baseball stadiums, as well as basketball courts,~~ would be located on the eastern and southern portion of the proposed project site.

Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA L_{eq} at 50 feet.²² Noise generated by activity in the football and baseball ~~stadiums~~fields would be audible to residences along Wood Avenue and Aldrich Road. **Table 3E-11** shows ambient noise generated by athletic activity at nearby sensitive receptors. As shown, 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.

²² LAUSD, OEHS, *New School Construction Program, Final PEIR (incorporates the New School Construction Program, Draft EIR)*, published May 2004, Board Certified June 8, 2004. p. 3.3-8.

**TABLE 3E-11
ATHLETIC AREA NOISE LEVELS**

Noise Receptor	Distance (Feet) ^a	Athletic Area Noise Level (dBA Leq) ^b	8 Foot Wall Attenuation (dBA, Leq)	Existing Ambient Noise Level (dBA Leq) ^c	dBA Increase	Significant (Yes/No)
Residences – Wood Ave.	5	85	80	51	29	Yes
Residences – Aldrich Rd	5	85	80	51	29	Yes

^a Distance of noise source to receptor.

^b Athletic area noise level at receptor location, with distance adjustment

^c Existing ambient noise level at receptor location.

NA=Not Applicable

SOURCE: ESA, 2008.

Operation (vehicular)

Vehicular related operational noise levels would result from parked, idling, and moving vehicles on the local roadway system and on the proposed project site. Parking noise could include occasional car alarm noise, loud radios, brake noise, vehicle horns, vehicle doors/trunks opening and closing, and conversations of people using the parking lot. The most disruptive of these noise sources would be associated with car alarms and vehicle horns because of their intermittent nature and loudness. Activity in the parking lot would generate a noise level of approximately 60 dBA L_{eq} at 50 feet.²³ The parking lot would be located approximately 190 feet from residences on Wood Avenue and approximately 950 feet from residences on Aldrich Road. Based on distance attenuation, residences along Wood Avenue and Aldrich Road could be exposed to 48 and 34 dBA, respectively, which are below existing ambient noise levels. As such, potential parking lot noise would result in a less than significant impact.

A bus drop-off and pick-up lane would be located near of Tweedy Boulevard. Drop-off and pick-up lanes would be located within 450 feet of residential properties on Wood Avenue. Private vehicles, buses, and delivery trucks traveling to and from the proposed project site may generate noise levels as high as 65 dBA at a distance of 50 feet.²⁴ Residences on Wood Avenue could experience noise levels of up to 46 dBA. This activity would occur for short-time periods (i.e., less than 15 minutes) during the day and would not occur within noise sensitive hours (10 PM and 7 AM). Therefore, the impact would be less than significant.

With respect to roadway noise impacts, the greatest project-related traffic would be generated during the hour preceding and the hour following normal school hours. To ascertain off-site noise impacts, traffic was modeled under future year (2012) no project and with project conditions. Results are summarized below in **Table 3E-12**. The roadway noise increase attributed to the

²³ Harris, Cyril M., *Handbook of Noise Control*, 1979.

²⁴ Patterson, W.N., R.A. Ely, and S.M. Swanson, *Regulation of Construction Activity Noise*. Bolt Baranek and Newman, Inc. Report 2887, for the Environmental Protection Agency 65.0, Washington, D.C., November 1974.

**TABLE 3E-12
SUMMARY OF POTENTIAL ROADWAY NOISE LEVELS IN THE PROJECT AREA**

Roadway Segment	CNEL at 50 Feet from Right-Of-Way				
	Existing	Future 2012 No Project	Future 2012 with Project	Difference	Significant
Atlantic Ave north of Firestone Blvd	71	72	72	0	No
Atlantic Ave south of Firestone Blvd	68	70	70	0	No
Firestone Ave east of Atlantic Blvd	72	74	74	0	No
Firestone Ave west of Atlantic Blvd	71	72	72	0	No
Rayo Ave north of Firestone Ave	59	59	59	0	No
Rayo Ave south of Firestone Ave	67	68	68	0	No
Firestone Ave east of Rayo Ave	71	75	75	0	No
Firestone Ave west of Rayo Ave	69	74	74	0	No
Atlantic Ave north of Southern Ave	69	69	70	1	No
Atlantic Ave south of Southern Ave	70	70	71	1	No
Southern Ave east of Atlantic Ave	65	66	66	0	No
Southern Ave west of Atlantic Ave	66	66	66	0	No
Rayo Ave north of Southern Ave	67	67	67	0	No
Rayo Ave south of Southern Ave	63	63	63	0	No
Southern Ave east of Rayo Ave	59	59	60	1	No
Southern Ave west of Rayo Ave	64	64	65	1	No
Adella Ave south of Southern Ave	54	55	56	1	No
Southern Ave east of Adella Ave	57	57	57	0	No
Southern Ave west of Adella Ave	59	59	60	1	No
Atlantic Ave north of Wood Ave	71	72	72	0	No
Atlantic Ave south of Wood Ave	71	72	72	0	No
Wood Ave east of Atlantic Ave	56	56	56	0	No
Pinehurst Ave south of Tweedy Blvd	54	54	54	0	No
Tweedy Blvd east of Pinehurst Ave	68	69	69	0	No
Tweedy Blvd west of Pinehurst Ave	68	69	69	0	No
Atlantic Ave north of Tweedy Blvd	71	72	72	0	No
Atlantic Ave south of Tweedy Blvd	71	72	72	0	No
Tweedy Blvd east of Atlantic Ave	56	56	63	7	Yes
Tweedy Blvd west of Atlantic Ave	68	69	69	0	No
Atlantic Ave north of Chakemco St	70	71	71	0	No
Atlantic Ave south of Chakemco St	70	71	71	0	No
Chakemco St east of Atlantic Ave	53	54	54	0	No
Atlantic Ave north of Wright Rd	70	71	71	0	No
Atlantic Ave south of Wright Rd	68	70	70	0	No
Wright Rd east of Atlantic Ave	66	66	66	0	No
Atlantic Ave north of Michigan Ave	69	70	70	0	No
Atlantic Ave south of Michigan Ave	69	70	70	0	No
Michigan Ave east of Atlantic Ave	61	61	61	0	No
Michigan Ave west of Atlantic Ave	60	60	60	0	No

BOLD values show potentially significant noise increases prior to any mitigation

SOURCE: ESA, 2008.

proposed project would be less than the three dBA L_{dn} increment at all analyzed segments except for along Tweedy Boulevard east of Atlantic Avenue where the project-related noise increase would be approximately seven dBA. This roadway segment has low levels of existing traffic volume and, as such, a small number of new daily trips may significantly raise traffic volumes. Nonetheless, the project-related mobile traffic noise level increase would result in a significant and unavoidable project-related impact.

On-site Noise Levels – Impact to Students at Proposed Project Site

Ambient community noise external to the school may affect future students of the proposed project. LAUSD standards used for exterior and interior noise are 67 and 45 dBA L_{eq} , respectively.²⁵ Table 3E-12 shows the existing and future monitored noise levels along roadway segments bordering the proposed project site. The existing and future noise levels along Wood Avenue east of Atlantic Avenue and Tweedy Boulevard east of Atlantic Avenue are below the 67 dBA L_{eq} exterior standard. Existing and future noise levels on Atlantic Avenue to the west of the site are above 67 dBA, but the road does not abut the project site, buildings are blocking the line of site, and the school parking lot is between classrooms and the property line which would further attenuate noise levels by distance. The railroad tracks east of the site was found to have an hourly L_{eq} that ranged from 54 to 62 dBA. Therefore, existing and future noise levels around the project site would result in a less than significant noise impact on school development.

Mitigation Measures

Implementation of the following construction mitigation measures, which includes BMPs as identified in the PEIR, would reduce construction noise levels.²⁶

Construction

- NOI-1** LAUSD's construction shall not occur within the City of South Gate's noise sensitive hours of 10 PM and 7 AM.
- NOI-2** LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices.
- NOI-3** LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities
- NOI-4** LAUSD's construction contractor will require all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible.

Residual Impacts

Even with the implementation of Mitigation Measures NOI-1 through NOI-4, residual impacts would be significant and unavoidable.

²⁵ *Ibid.*, p. 3.3-7.

²⁶ LAUSD, OEHS, *New School Construction Program, Final PEIR*, published May 2004, Board Certified June 8, 2004. p. 3.3-8.

Impact 3E.2: Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

Significant and Unavoidable with Mitigation Incorporated. Operational activities associated with the proposed project that would generate periodic noise include student activity on-site (especially within the play field and track field), bells, and alarms. These sources would be limited to school hours. As noted in Impact 3E.1, on-site activities would result in a significant and unavoidable impact. Also, mobile noise associated with the project-related increase in traffic volumes would result in a significant and unavoidable impact along Tweedy Boulevard east of Atlantic Avenue, due to a 7 dBA increase in noise levels from existing conditions.

Mitigation Measures

There are no feasible mitigation measures to reduce on-site athletic field noise levels or off-site, project-related operational noise levels along Tweedy Boulevard east of Atlantic Avenue.

Residual Impacts

Residual impacts would be significant and unavoidable.

Impact 3E.3: Expose persons to or generate excessive groundborne vibration or groundborne noise levels.

Less Than Significant Impact. Both construction and operation of projects can generate groundborne vibration. In general, demolition of structures or installation of structural foundation piles during construction generates the highest vibrations. Vibratory compactors or rollers, pile drivers, and pavement breakers can generate perceptible vibration. Heavy trucks can also generate groundborne vibration, which vary depending on vehicle type, weight, and pavement conditions. The FTA has published standard vibration velocities for construction equipment operations.²⁷ The PPV and RMS for various pieces of construction equipment are listed in **Table 3E-13**.

**TABLE 3E-13
VIBRATION VELOCITIES FOR CONSTRUCTION EQUIPMENT**

Equipment	Approximate Peak Particle Velocity at 25 ft, inch/second	RMS at 25 ft (Vdb)
Caisson drilling	0.089	87
Large Bulldozer	0.089	87
Loaded Trucks	0.035	86
Sonic Pile Driver	0.170	.089
Impact Pile Driver	0.644	104

^a Data reflects typical vibration level.

SOURCE: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

²⁷ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, April 1995.

Short-term vibration would occur as a result of construction activities. The nearest sensitive receptors to the proposed project site would be at least 50 feet away from significant vibration sources. At 50 feet, an impact pile driver would have a PPV of 0.2 inches per second which is the threshold for structural damage.²⁸ Therefore, construction vibration at 50 feet would be the minimum distance impact pile driving could occur and vibration levels due to construction activity at nearby sensitive receptors would not be anticipated to cause structural damage.

However, vibration impacts associated with pile-driving activities are anticipated to be perceptible and a potential temporary nuisance. As such, vibration associated with construction activities is anticipated to result in a significant and unavoidable impact.

Future groundborne vibration in the project vicinity would continue to be generated by vehicular travel on the local roadways. Proposed project operation would not result in any additional long-term ground-borne vibration sources. As such, proposed project operation would not exceed the 2.0 inch per second PPV significance threshold for groundborne vibration. The impact would be less than significant.

Mitigation Measures

Mitigation measures are not required.

Residual Impacts

Residual impacts would be less than significant.

Impact 3E.4: Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

Construction

Significant and Unavoidable with Mitigation Incorporated. The proposed project would cause temporary noise increases during construction activities at the proposed project site that would be perceptible from nearby residences. Noise levels would vary depending on the types and number of construction equipment in operation at any given time. Tables 3E-9 and 3E-10 show exterior and interior noise levels, respectively, at nearby sensitive receptors. As noted in Impact 3E.1, short-term construction activity would result in a significant and unavoidable impact with implementation of mitigation measures. Refer to Impact 3E.1 for further discussion.

Operation

Significant and Unavoidable with Mitigation Incorporated. Operational periodic increases in ambient noise levels in the project vicinity are associated with the student auto drop-off/pick-up zone for private vehicles, which would be provided off of Tweedy Boulevard. Delivery trucks and buses traveling to and from the proposed project site, along with vehicle activity, may generate noise levels as high as 88 dBA at a distance of 50 feet.²⁹ However, this activity would

²⁸ American National Standards Institute (ANSI), 1983, "Guide to the Evaluation of Human Exposure to Vibration in Buildings," ANSI S.329-1983.

²⁹ Patterson, W.N., R.A. Ely, and S.M. Swanson, *Regulation of Construction Activity Noise*. Bolt Baranek and Newman, Inc. Report 2887, for the Environmental Protection Agency, Washington, D.C., November 1974.

occur for short-time periods during the day and would not occur within noise sensitive hours (10 PM and 7 AM). In addition, intermittent daytime noises have little effect on day-night average noise levels, which are critical to noise-sensitive land uses.³⁰ Therefore, the impact would be less than significant. Refer to Impact 3E.1 for further discussion.

Mitigation Measures

As previously discussed, implementation of Mitigation Measures NOI-1 through NOI-4 would decrease construction noise impacts, but impacts would remain significant and unavoidable.

Residual Impacts

Residual impacts would be significant and unavoidable.

3E.5 Cumulative Impacts

Impact 3E.5: Result in cumulatively considerable impact with respect to noise.

Significant and Unavoidable with Mitigation Incorporated. Noise from construction of the proposed project and related projects, would be localized, thereby potentially affecting areas immediately surrounding or between each particular proposed project site. There are 6 projects in the surrounding area. Currently, LAUSD has no means of estimating potential noise generation or the construction schedule associated with these projects. Therefore, it is not considered in the cumulative analysis.

Regarding roadway noise, the cumulative increase in future CNEL traffic noise levels at project buildout with future ambient growth relative to the existing baseline are presented in Table 3E-12 as shown above. As shown, the roadway noise increase attributed to the proposed project would be less than the three dBA L_{dn} increment at all analyzed segments except for along Tweedy Boulevard east of Atlantic Avenue. This noise level increase would be greater than the three dBA L_{dn} incremental threshold and the project would result in a cumulatively considerable, significant and unavoidable impact.

Mitigation Measures

There are no feasible mitigation measures to reduce cumulative operational noise levels from mobile sources along Tweedy Boulevard east of Atlantic Avenue.

Residual Impacts

The cumulative noise impacts would be significant and unavoidable.

³⁰ LAUSD, OEHS. *New School Construction Program, Final PEIR*, published May 2004. Board Certified June 8, 2004, p. 3.3-10.

SECTION 3F

Pedestrian Safety

3F.1 Introduction

This section discusses potential impacts on pedestrian safety resulting from the proposed project. This analysis is based in part on the results of a Pedestrian Safety Study included as part of the Traffic Impact Analysis prepared by KOA, which is provided in Appendix ~~DJ~~ of the ~~DEIR 2008 of this August 2009 FEIR~~.¹ This analysis was performed in accordance with the policies of the Program EIR and the California Department of Transportation's (Caltrans) *School Area Pedestrian Safety Manual*.² The analysis focuses on the potential for pedestrian safety hazards associated with construction, pedestrian routes to school, and existing and proposed transportation facilities. Section 3H, *Traffic*, of this EIR addresses the findings of the Traffic Impact Study.

3F.2 Existing Environmental Setting

The proposed project site lies within a highly urbanized area consisting primarily of commercial, industrial, and residential uses. The street and road network in the area is comprised of a grid of arterials, collector streets, and roadways. The proposed project site is approximately 0.2 mile west of I-710 and approximately 2.3 miles north of I-105.³ *The following streets act as boundaries to the proposed project site: Wood Avenue, Atlantic Avenue, and Tweedy Boulevard.* ~~Wood Avenue is a two-lane roadway, and Atlantic Avenue and Tweedy Boulevard are four-lane roadways.~~ *Wood Avenue and Aldrich Avenue are a two-lane roadways, and Atlantic Avenue is a four-lane roadway.* See Section 3H, *Traffic and Transportation*, of this EIR for a complete description of the roadways in the project vicinity.

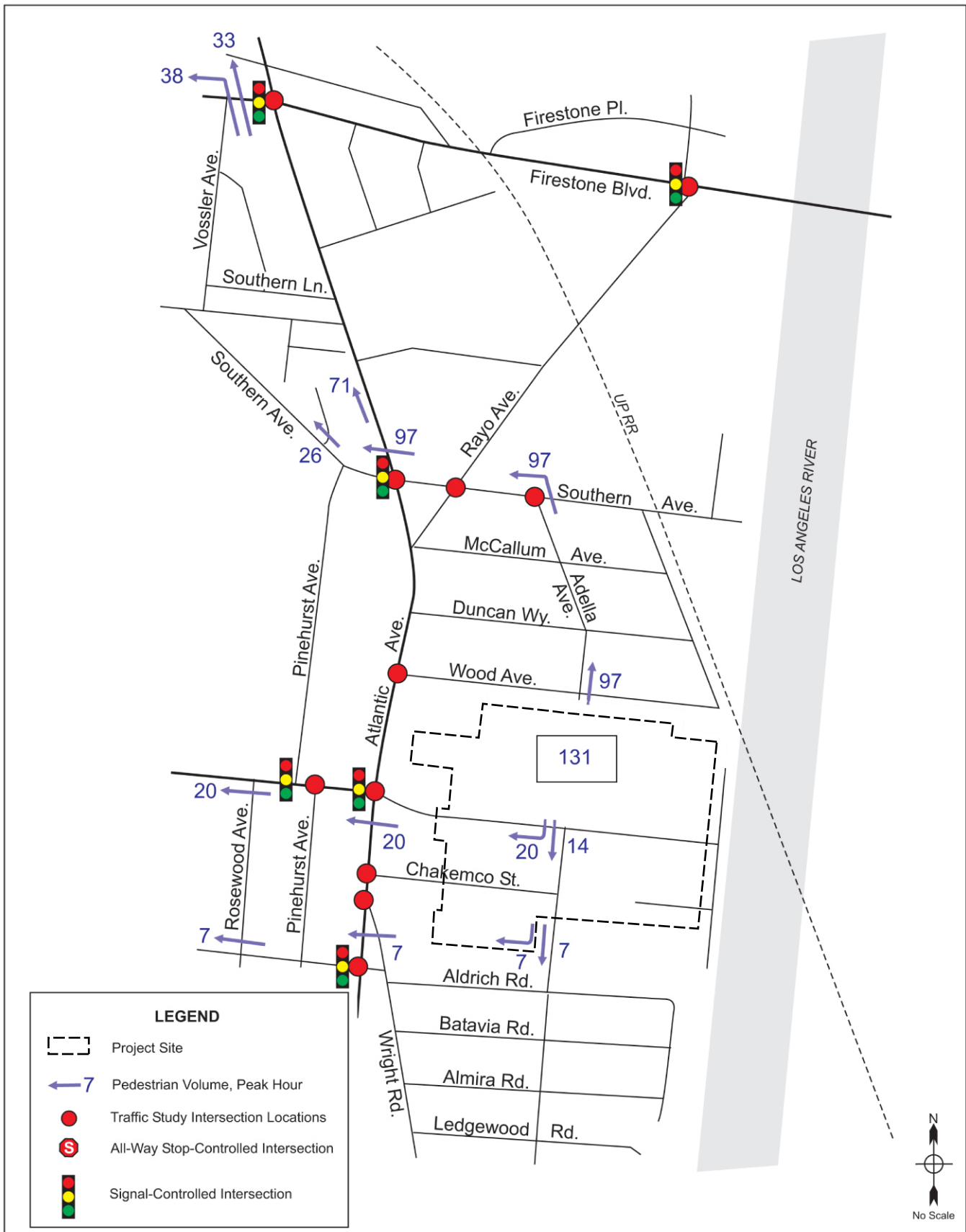
Existing Pedestrian Network

The proposed high school would provide 1,421 new net student seats on a two-semester schedule. The pedestrian network in the study area is comprised of the surrounding street grid with various traffic intersection controls as described below (see **Figure 3F.1**). The study area, defined through consultation with the City of South Gate staff, encompasses eleven roadway intersections

¹ KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008.

² Caltrans, *AB 1475 Street and Highways Code Sections 2331, 2333 In3 2333.5, Safe Routes to School (SR2S)*, January 2000.

³ Rand McNally and Company, *Thomas Guide, Los Angeles and Orange Counties*, 2005.



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02

Figure 3F.1
Analyzed Pedestrian Routes
and Volumes

listed in Section 3H, Traffic.⁴ As shown on **Table 3F-1**, as well as Figure 3H.1 of the *Traffic and Transportation* section, the study area includes the following intersections and road segments:

**TABLE 3F-1
STUDY AREA INTERSECTIONS AND ROAD SEGMENTS**

Intersections		
Atlantic Avenue / Firestone Boulevard	Rayo Avenue / Southern Avenue	Pinehurst Avenue / Tweedy Boulevard
Rayo Avenue / Firestone Boulevard	Atlantic Avenue / Tweedy Boulevard	Atlantic Avenue / Wood Avenue
Atlantic Avenue / Southern Avenue	Atlantic Avenue / Chakemco Street	Atlantic Avenue / Michigan Avenue
Adella Avenue / Southern Avenue	Wright Road / Atlantic Avenue	
Roadway Segments		
Adella Avenue, north of Wood Avenue	Wood Avenue, west of Adella Avenue	Tweedy Boulevard, east of Atlantic Avenue

Source: KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008. p. 6.

Most of the local streets in the project vicinity have sidewalks and crosswalks. The street network surrounding the proposed project site is primarily used to support the surrounding residential neighborhood and commercial development along Atlantic Avenue. In general, the smaller residential streets are controlled by stop signs. All traffic signals within the study area provide pedestrian signals and marked crosswalks.

At-grade railroad tracks are located approximately 200 feet northeast of the proposed project on the near side of I-710. Students are not anticipated to be coming to the school from east of the railroad tracks. However, adequate warning signs would be provided at the tracks to warn pedestrians of oncoming trains.

3F.3 Applicable Regulations

California Department of Transportation. Caltrans, in consultation with the California Highway Patrol (CHP), establishes and administers the “Safe Routes to School” (SR2S) Program.⁵ The purpose of the program is to provide competitive grants to local government agencies (such as the LADOT) to improve the safety of children as they walk or bike to school. LADOT is the applicant and the agency that assumes responsibility and accountability for the use and expenditure of funds for the SR2S Program. The SR2S Program is expected to be extended by Congress and receive funding through future transportation bills. School districts are responsible for establishing and enforcing school route plans, and siting and developing school facilities that foster a good walking environment. These responsibilities include choosing school locations that balance vehicle access with pedestrian safety needs, constructing adequate

⁴ KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008. p. 6

⁵ Caltrans, *AB 1475 Street and Highways Code Sections 2331, 2333 In3 2333.5, Safe Routes to School (SR2S)*, January 2000.

pedestrian facilities along the perimeter of the school site, and working with the local public works agency to fund and install adequate crossing protection at key points. School districts are responsible for distributing walk route maps to parents and students.

City of South Gate. The City of South Gate Public Works Department, Engineering Division is responsible for transportation planning within its boundaries.⁶ The scope of the traffic impact and pedestrian safety analyses were defined in a Memorandum of Understanding (MOU) between KOA Corporation and the City of South Gate.

The Traffic and Pedestrian Safety Study (Appendix ~~DJ~~ of the ~~DEIR 2008~~ ***of this August 2009 FEIR***) conducted for this project follows guidelines agreed upon in the MOU. The use of trip generation rates, methodologies, and other standards provides consistency among traffic studies for various LAUSD projects. In addition, this pedestrian analysis has been performed as part of the traffic study in accordance with LAUSD practices for new school projects.

Los Angeles Unified School District. LAUSD's OEHS document entitled *Traffic and Pedestrian Safety Requirements for New Schools*,⁷ provides performance guidance to minimize potential pedestrian safety risks to students, staff, and visitors at LAUSD schools.⁷ The document includes guidelines for student drop-off areas, vehicle access, pedestrian routes to school, and general signage. In accordance with that document and the Caltrans *School Area Pedestrian Safety Manual*, LAUSD would prepare a pedestrian safety plan and safe-routes-to-school map to ensure safe pedestrian access.⁸

The performance guidelines included in the *Traffic and Pedestrian Safety Requirements for New Schools*, establish the following criteria:⁹

A. *Student Drop-Off Areas.*

- Whenever feasible, student and bus drop-offs shall be located out of the active traffic flow. Student drop-off areas shall be located off "major streets" (i.e., consisting of four or more active traffic lanes or streets experiencing 500 or more vehicles trips during the AM peak hour). When a student drop-off area on a major street is unavoidable, an interior on-site drop-off area is required. When a student drop-off area is on a non-major street a minimum eight-foot-wide curb cut out of the active traffic flow is required for the drop-off/pick-up of passengers.
- School access driveways and student drop-off areas shall be separated a minimum distance of 60 feet to minimize the extent to which passenger drop-off/pick-up impedes the flow of vehicles into and out of school access driveways.
- When feasible, school bus drop-off zones shall not be located along the main school entrance, in order to minimize the potential for buses to impede student drop-off/pick-up.

⁶ City of South Gate, Engineering Division website. Accessed July 2007. Available<<http://www.sogate.org/index.cfm/fuseaction/Detail/CID/110/NavID/69/>>

⁷ *Traffic and Pedestrian Safety Requirements for New Schools*.

⁸ Caltrans, *School Area Pedestrian Safety Manual*, 1987 edition.

⁹ *Traffic and Pedestrian Safety Requirements for New Schools*.

- All student drop-off areas shall be clearly marked and signed.

B. Vehicle Access.

- “Right Turn Only” controls are required if turning movements have the potential to create safety hazards or traffic congestion. Vehicle access, including driveways, and service roads to the school site shall, where feasible, be aligned with opposing streets to form four-way intersections with sufficient traffic controls. School site access ways shall be located and designed in concert with student drop-off areas and the dominant existing traffic flow in the area to promote safe and orderly turning movements and pedestrian crossings.

C. Pedestrian Routes to School.

- “Pedestrian Routes to School” maps shall be prepared by appropriate City entities and distributed by LAUSD to parents and students prior to opening of new schools. School traffic studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as the need for sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

City of South Gate General Plan. California state law requires that every city and county prepare and adopt a comprehensive, long-range plan to serve as a guide for the physical development of that jurisdiction. The City of South Gate General Plan is a comprehensive document with seven elements, one of which includes policies that are applicable to pedestrian safety. Currently, the City of South Gate is in the process of updating its general plan.¹⁰ The following text from the General Plan Circulation Element is applicable to the proposed project:

Circulation Element. This element is concerned with the circulation and corridor development characteristics of the City and the overall circulation system.

Goal 1: To provide a plan for a coordinated street circulation system for the safe and efficient movement of people and goods.

Policy 1.4: The City will create a safe and convenient circulation system for pedestrians.

3F.4 Impacts and Mitigation Measures

Methodology

As part of the MOU between LAUSD and the City of South Gate, an inventory of the pedestrian system within one-quarter mile of the proposed main school entrance was completed. The scope of the inventory included the location and identification of existing traffic controls in the area that could be used by students to access the school site from adjacent neighborhoods. Recommended pedestrian routes were formulated based on the information collected during the pedestrian

¹⁰ City of South Gate, General Plan Update, website: <http://www.sogate.org/index.cfm/fuseaction/Detail/CID/101/NavID/60/>, Accessed online November 17, 2008.

system inventory.¹¹ Recommended routes would use existing traffic controls, where available, to provide safe crossing points on major roadways. Pedestrian volumes were calculated using mode split characteristics developed for the PEIR.¹² Pedestrian volumes and routes were compared to vehicle routes for student drop-off and pick-up activity as established in (see Section 3F *Transportation and Traffic*). The percentage of students traveling by each mode, and the forecast numbers of students that would travel to and from the proposed school by each mode, were considered in the analysis. Traffic control locations that were documented include traffic signals, active rail at-grade crossings, signed and striped crosswalks, and all-way stop-controlled intersections. Recommended pedestrian routes were formulated, based on the information collected for this initial pedestrian safety study. Routes with existing traffic controls, were used when feasible, to provide safe crossing points on major roadways. The following intersections were considered in the pedestrian analysis:¹³

- Adella Avenue / Southern Avenue; and
- Atlantic Avenue / Wood Avenue.

Criteria for Determining Significance

The criteria used to determine the significance of an impact related to pedestrian safety are based on the policies of the PEIR and the Caltrans *School Area Pedestrian Safety Manual*.¹⁴ The proposed project may result in potentially significant impacts relating to pedestrian safety if it would:

- Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses;
- Create unsafe routes to schools for students walking from local neighborhoods; and
- Result in a cumulatively considerable impact to pedestrian safety.

LAUSD's OEHS document entitled *Traffic and Pedestrian Safety Requirements for New Schools,*¹⁵ provides performance guidance to minimize potential pedestrian safety risks to students, staff, and visitors at LAUSD schools.¹⁵ The document includes guidelines for student drop-off areas, vehicle access, pedestrian routes to school, and general signage. In accordance with that document and the Caltrans *School Area Pedestrian Safety Manual*, LAUSD would prepare a pedestrian safety plan and safe-routes-to-school map to ensure safe pedestrian access.¹⁶ In addition, the Traffic Impact Study complies with the performance guidelines included in the Traffic and Pedestrian Safety Requirements for New Schools, which includes the following criterion:¹⁷ Criteria A requires proper placement of Student Drop-Off Areas, Criteria B requires

¹¹ *Ibid*, p 60.

¹² LAUSD, OEHS, *New School Construction Program, Final PEIR*, (incorporates the New School Construction Program, Draft PEIR), published May 2004, Board certified June 8, 2004, p. 3.1-3.

¹³ KOA, *Traffic Study for Los Angeles Unified School District South Regional High School #9 Los Angeles, CA*, July 6, 2008, p. 60.

¹⁴ Caltrans. *AB 1475 Street and Highways Code Sections 2331, 2333 In3 2333.5. Safe Routes to School (SR2S)*, January 2000.

¹⁵ LAUSD, *Traffic and Pedestrian Safety Requirement for New Schools*, December 15, 2005.

¹⁶ Caltrans, *School Area Pedestrian Safety Manual*, 1987 edition.

¹⁷ LAUSD, *Traffic and Pedestrian Safety Requirement for New Schools*, December 15, 2005.

safe vehicle access, and Criteria C requires implementation to ensure safe pedestrian routes to school.

Project Impacts and Mitigation Measures

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A of the DEIR-2008).

Impact 3F.1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.

Significant and Unavoidable with Mitigation Incorporated. Vehicular access to the proposed parking lot for faculty and staff would be provided via the remaining northern portion of Adella Avenue and from Tweedy Boulevard. On-street parking is available in the vicinity of the proposed project site for student and visitor parking (see Section 3H.3 for parking impact discussion).¹⁸ The main school building entrance would be accessed from Tweedy Boulevard. Vehicle traffic accessing the pick-up/drop-off area would move in an easterly direction along Tweedy Boulevard, turn left into the proposed project access driveway at the proposed new eastern terminus of Tweedy Boulevard, and head westerly within the site into the pick-up/drop-off area. Exiting vehicles would turn back onto westerly Tweedy Boulevard at a second access driveway on the west side of the pick-up/drop-off area. A bus loading area for a limited special-needs program, using buses of 20-foot length or smaller, would be provided via a separate access point that would be adjacent to the staff/faculty parking area.

Based on the mode splits identified in the PEIR, the total net vehicle trip generation is 301 inbound vehicles in the AM peak period and 113 inbound student pedestrians.¹⁹ The traffic volumes were calculated based on the number of vehicles that would be crossing the intersections. Future projected pedestrian volumes were based on the observation of existing pedestrian traffic and future pedestrians estimated to cross the intersections. Due to the expected vehicular and pedestrian traffic volumes at the unsignalized intersections adjacent to the proposed project site, implementation of the proposed project could result in significant vehicular and pedestrian safety hazards. However, with implementation of the mitigation measures below, potential vehicular and pedestrian impacts on- and off-site would be reduced to acceptable levels. The impact would be less than significant.

Los Angeles Unified School District. As stated in the Traffic Impact Study by KOA, performed as part of this EIR, the proposed project adheres to the guidelines in *Traffic and Safety Requirements for New Schools*.^{20, 21} According to the Traffic Impact Study, the placement of the student drop-off area complies with all three criteria. Criteria A requires that the drop-off area not be located along major streets or thoroughfares (defined as four lanes of traffic or having high

¹⁸ KOA, *Traffic Impact Study for Los Angeles Unified School District South Regional High School #9 Los Angeles, CA*, July 2, 2008, p. 61.

¹⁹ LAUSD, OEHS, *New School Construction Program, Final Environmental Impact Report*, published May 2004, Board Certified June 8, 2004, p. 3.1-3.

²⁰ KOA, *Traffic Impact Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008, p.8

²¹ LAUSD, *Traffic and Pedestrian Safety Requirement for New Schools*, December 15, 2005.

traffic volumes). The site plan also complies with Criteria B because there would be at least 60 feet between the drop-off area and the school access driveway. Finally, the site plan complies with Criteria C, which states the bus drop-off area must be located so that it will not conflict with the vehicle drop-off area.

Another possible pedestrian safety concern is a set of Union Pacific (UP) train tracks within 200 feet of the project site. Although students are not anticipated to be coming to the school from east of the train tracks, a rail safety study was conducted by Parsons, Brinckerhoff, Quade, and Douglas, Inc. to assess this potential impact.²² The northeast corner of the project site is approximately 100 feet from the UP railroad track and there is an at-grade rail crossing with proper signage and gates approximately 1,000 feet north of the project site on Southern Avenue. The rail tracks are used for freight trains and approximately six trains per day that cross the tracks at a maximum of 20 mph. The average annual daily vehicular traffic crossing the tracks on Southern Avenue is approximately 500 vehicles. Both non-hazardous and hazardous materials are transported on this railway.²³ For more information regarding the transport of hazardous materials, see *Chapter 3D, Hazards*.

The rail safety study concluded that the predicted number of total accidents/incidents per million train miles for the railway that passes by the project site is within the accepted amount of risk as determined by the LAUSD. The predicted number of total accidents/incidents per million miles for UP in California is 1.12, while in Los Angeles County, it is 0.006. As the project site is in Los Angeles County, that number would be used to assess the risk of an incident on the track in the vicinity of the site. However, to insure the safety of student pedestrians, Mitigation Measures PED-1 through PED-3 would be implemented to reduce potential impacts.

Mitigation Measures

- PED-1** LAUSD shall coordinate with the City of South Gate and UP Railroad to provide warning signs near the railroad crossing areas adjacent to the school.
- PED-2** Six months prior to opening the school, LAUSD's OEHS shall coordinate with the City of South Gate to prepare a "Pedestrian Routes to School" plan. LAUSD's OEHS will distribute the maps to the school upon completion and the maps will then be distributed to students, parents and staff.
- PED-3** LAUSD shall coordinate with the City of South Gate to approve plans construct a sidewalk along the north side of Tweedy Boulevard between Atlantic and the school property line.

Residual Impacts

The implementation of the Mitigation Measures PED-1 through PED-3 would reduce potential vehicular and pedestrian impacts on- and off-site. Implementation of these measures would reduce pedestrian impacts. However, pedestrian impacts would be potentially significant unless the installation of missing sidewalks identified in Mitigation Measure PED-3 occurs prior to the opening of the proposed school. The sidewalk improvements require approval of the City of

²² Parsons, Brinckerhoff, Quade, and Douglas, *Los Angeles Unified School District Site Assessment Rail Safety Study Southeast Learning Complex*, June 29, 2005.

²³ *Ibid.*

South Gate. Because LAUSD cannot ensure that sidewalk improvements would be completed prior to the opening of the proposed school, the absence of sidewalks as an existing condition would result in a significant and unavoidable impact to pedestrian safety.

Impact 3F.2: Create unsafe routes for students walking from local neighborhoods.

Significant and Unavoidable with Mitigation Incorporated. Pedestrian routes have been formulated based on the density and geographical dispersion of the population for the school's area of influence within the local district. All recommended routes use existing traffic controls to provide safe crossing points on major roadways. Figure 3F.1 shows suggested pedestrian traffic controls, existing and suggested pedestrian routes, and anticipated student traffic volumes.

A traffic control warrant analysis was conducted for the intersections of Atlantic Avenue at Wood Avenue, and Adella Avenue at Southern Avenue, which are both unsignalized intersections. This analysis was based on the calculation of "acceptable gap" times, which is the elapsed time between individual vehicles or vehicle groups that would allow safe travel by a pedestrian to cross roadway travel lanes. It was also based on collected traffic volumes and the physical configuration of the intersection.

At the intersection of Atlantic Avenue at Wood Avenue, the acceptable gap time was calculated at 24 seconds (see Appendix **D.J** for methodology). Thus, to safely cross either Atlantic Avenue or Wood Avenue, a pedestrian would need a gap of 24 seconds between cars. Project-related pedestrian volumes at this location would total 48 pedestrians. Based on pedestrian and vehicle volumes at this intersection, the results of the Unified Traffic Control Devices (MUTCD) signal warrant analysis indicate that signalized control at the intersection of Atlantic Avenue and Wood Avenue is not warranted.

At the intersection of Adella Avenue at Southern Avenue, the acceptable gap time was calculated at 16 seconds. Project-related pedestrian volumes at this location would total 49 pedestrians. Like the intersection of Atlantic Avenue at Wood Avenue, the intersection of Adella Avenue at Southern Avenue would not warrant signalized control according to the MUTCD warrant analysis.

The existing intersection of Adella Avenue and Tweedy Boulevard has four approaches. In the post-project period, the north leg would become the entrance to the student pick-up/drop-off area and the southern leg of the intersection would be removed with the planned demolition of Adella Avenue south of the project site. The eastern leg would also be removed with the demolition of Tweedy Boulevard east of the planned pick-up/drop-off area entrance. On-site student pathways should encourage pedestrian travel between the eastern areas of the campus and the proposed sidewalk to be constructed with the City of South Gate's approval along the north side of Tweedy Boulevard. Such restrictions would assist in the orderly movement of vehicles through the pick-up/drop-off area, by removing potential conflicts with pedestrian crossings. Student pedestrians traveling between the project site and the residential area to the south can travel along Atlantic Avenue, Wright Road, and Aldrich Road. The demand for pedestrian travel along such a route is expected to be minimal based on the school service area.

The existing network of sidewalks and traffic control devices within the neighborhood would provide access routes for student pedestrians. During the course of fieldwork for this analysis, sidewalks were identified on all potential pedestrian routes leading to the proposed project site, with the exception of some segments of Tweedy Boulevard, Chakemco Street, and Adella Avenue. A survey was conducted of sidewalk widths within the local area, within a ¼-mile radius of the proposed project site.

The sidewalk survey, summarized in **Table 3F-2** identifies the missing sidewalk segments and also identified segments that are less than five feet in width. Such widths are below the five-foot minimum width defined by the Americans with Disabilities Act (ADA) guidelines. The missing and narrow sidewalk facilities are identified by bold text within the table, and the roadway segments with missing sidewalk facilities are identified by grey shading.

**TABLE 3F-2
EXISTING AREA SIDEWALK WIDTHS**

Roadway	Segment	Width (ft)			
		East/South		West/North	
		Sidewalk	Landscape	Sidewalk	Landscape
Southern Avenue	Atlantic Avenue to Rayo Avenue	6	0	5	0
	Rayo Avenue to Adella Avenue	4.5	5	0	5
McCallum Avenue	Atlantic Avenue to Salt Lake Avenue	5	4	5	4
Duncan Way	Atlantic Avenue to Salt Lake Avenue	5	4.5	5	3.5
Wood Avenue	Atlantic Avenue to Salt Lake Avenue	4	4.5	4	4.5
Tweedy Boulevard	Pinehurst Avenue to Atlantic Avenue	4	4	4	5
	Atlantic Avenue to Adella Avenue	0	0	0	0
Chakemco Street	Atlantic Avenue to Adella Avenue	0	0	0	0
Aldrich Road	Wright Avenue to Blumont Road	4	7	4	7
Michigan Avenue	Atlantic Avenue to Wright Road	5	5	0	0
Batavia Road	Wright Avenue to Blumont Road	4	5	4	5
Atlantic Avenue	Southern Avenue to Michigan Avenue	7.5	5	7	5
Wright Road	Chakemco Street to Aldrich Road	4	7	0	4
	Southern Avenue to McCallum Avenue	5	4	5	4
Adella Avenue	McCallum Avenue to Wood Avenue	5	4.5	5	4
	Wood Avenue to Aldrich Road	0	0	0	0
	Aldrich Road to Almira Road	4	5	4	5
Salt Lake Avenue	McCallum Avenue to Wood Avenue	0	0	4.5	0
Blumont Road	Aldrich Road to Batavia Road	0	0	4.5	0

^a Stop-controlled intersection, average delay; LOS was calculated based on the 1,200 capacity utilizing the Circular 212 methodology.

SOURCE: KOA, *Traffic Study for LAUSD South Region High School #9 Project*, July 2, 2008.

The missing sidewalk segments noted in grey within the table include the following segments:

- Tweedy Boulevard – The shoulder of this roadway blends into paved portions of adjacent light industrial parcels. Roadway generally lacks curb and gutter and sidewalk facilities.
- Chakemco Street – This roadway is generally in the same condition as Tweedy Boulevard.
- Adella Avenue – This roadway would be vacated in order to assemble the project site, and would be demolished to the south of the site. The condition of this roadway is also generally the same as Tweedy Boulevard.

The remaining segment of Adella Avenue to the north, after the project-related demolition, is within the existing residential area, and the segment to the south would not be adjacent to the project site nor would it carry any project-related trips. Pedestrian traffic to and from the south would be minimal, as the project would be constructed to relieve existing schools to the northwest and north. Chakemco Street would not be used by project traffic or as a pedestrian route. The sidewalks of substandard width were noted along nine local roadway segments. Five feet of width is the minimum pursuant to American with Disabilities (ADA) guideline for new sidewalk facilities. As the narrow sidewalk facilities are existing and would be passable by students, widening of these facilities is not recommended and no related impacts have been defined. Implementation of Mitigation Measures PED-4 through PED-5 would reduce all potential impacts to pedestrian safety at other intersections to a less than significant level.

Mitigation Measures

In addition to Mitigation Measures PED-1 through PED-3 the following mitigation measures shall be implemented to reduce pedestrian safety impacts associated with the proposed project:

PED-4 Four months prior to opening the proposed high school, 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.

PED-5 Six months prior to opening of the proposed high school, LAUSD's OEHS shall coordinate with the citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual." The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards.

The implementation of the Mitigation Measures PED-4 through PED-5 would reduce potential vehicular and pedestrian impacts on- and off-site. However, pedestrian impacts would be potentially significant unless the installation of missing sidewalks identified in Mitigation Measure PED-3 occurs prior to the opening of the proposed school. The sidewalk improvements require approval of the City of South Gate. Because LAUSD cannot ensure that sidewalk improvements would be completed prior to the opening of the proposed school, the absence of sidewalks as an existing condition would result in a significant and unavoidable impact to pedestrian safety.

Residual Impacts

Impacts would be significant and unavoidable.

Impact 3F.3: Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.

Less Than Significant With Mitigation Incorporated. The proposed project would be located adjacent to Atlantic Avenue, a Primary Arterial for the City of South Gate. However, the sidewalk along Atlantic Avenue is seven feet on the east side and 7.5 feet on the west. Also, the most utilized intersections on Atlantic Avenue are the intersection with Southern Avenue and the intersection with Tweedy Boulevard, both of which are signalized. The MUTCD signal warrant analysis for the intersection of Atlantic Avenue and Wood Avenue indicated that signalization was not necessary at this intersection. However, pedestrian traffic would be encouraged to proceed north on Adella Avenue to Southern Avenue to cross Atlantic Avenue at the signalized intersection. Impacts would be less than significant with mitigation incorporated.

Mitigation Measures

See Mitigation Measure PED-5 above.

Residual Impacts

Impacts would be less than significant.

3F.5 Cumulative Impacts

Impact 3F.4: Result in cumulatively considerable impact with respect to pedestrian safety.

Less Than Significant Impact with Mitigation Incorporated. Implementation of Mitigation Measures PED-1 through PED-5 would ensure that students attending the proposed high school would have safe routes to school. The construction and operation of the proposed project would therefore not result in a cumulative impact to pedestrian safety. The cumulative impact of the proposed project on pedestrian safety would be less than significant, with mitigation incorporated.

Mitigation Measures

Implementation of Mitigation Measures PED-1 through PED-5 above.

Residual Impacts

Impacts would be less than significant.

SECTION 3G

Public Services

3G.1 Introduction

This section focuses only on the impact that the proposed project may have on the Los Angeles County Fire Department (LACFD) Station No. 54, located at 4867 Southern Avenue in the City of South Gate, approximately 0.5 mile northwest of the project site. As described in the Initial Study, Section 4N (see Appendix A of the ~~DEIR 2008~~ of this August 2009 FEIR), project impacts to police protection, school facilities, and other public services were found to be less than significant and do not require further analysis within this Recirculated DEIR. As a result, this section focuses on the potential impacts to fire service capacity and response times from LACFD Fire Station No. 54. Refer to Appendix I for LACFD correspondence documentation.

3G.2 Existing Environmental Setting

Fire Protection Facilities and Services

Fire protection for the project site, as well as the entire City of South Gate, is provided through the LACFD. LACFD is funded through assessments paid by property owners of the City, which requires that the LACFD provide a "safe" level of service for the entire district and region. The City coordinates with LACFD to determine service demand, which considers response times, resources per dwelling unit, and regional response capacity.

Currently, LACFD employs 4,767 personnel, which includes 2,559 full-time firefighters, 90 fire suppression aids, 58 on-call fire fighters, as well as paramedics and an extensive reserve of safety and fire-fighting equipment.¹ LACFD operates 165 fire stations, several fire prevention offices and suppression camps; and serves 58 cities over an area of approximately 2,305 square miles. It services a population of just over 4.1 million residents and serves approximately 1.2 million residential units. LACFD Station No. 54, located approximately 0.5 mile northwest of the project site, would be the primary responder for fire protection services. Station No. 54 is one of 14 stations that comprise Division 6 (i.e., Battalions 13 and 20) of the LACFD. Division 6 provides fire protection for a total of six cities, including the cities of South Gate, Lynwood, Huntington Park, and Inglewood.

The adequacy of fire protection services provided by Fire Station No. 54 is based on required fire flow, the response distance from existing stations, population density, and LACFD's assessment

¹ Personal Communication with Christina Paulo, Public Information Office, LACFD, Personal Communication, June 18, 2008.

of needs in the area. In general, the required fire flow is closely related to land use. According to the LACFD, Fire Station No. 54 contains a four-person engine company, as well as a two-person paramedic squad, for a total of six LACFD employees on shift per 24-hour period. The closest additional paramedic squad is posted at Fire Station No. 163, located approximately 1.4 miles southeast of the proposed project site at 6320 Pine Avenue in the City of Bell. The closest ladder company to the proposed project site is located at Fire Station No. 164, located approximately 17 miles south of the project site at 6301 South Santa Fe Avenue, in the City of Huntington Park. Station No. 164 also contains a paramedic squad.

Emergency Access and Fire Flow

Currently, primary emergency response access to the project site is at the northern boundary of the site via Adella Avenue, with secondary access via Tweedy Boulevard. From its location at 4867 Southern Avenue, emergency response from Fire Station No. 54 would take Southern Avenue to Hildreth Avenue or Annetta Avenue.² The average response time for Fire Station No. 54 to the project site and throughout the area is approximately five minutes, if units are available.³ **Refer to Appendix I for LACFD correspondence documentation.**

In addition to facility equipment, personnel, and location, fire flow is an important factor in fire suppression activities. Fire flow is defined as the quantity of water available or needed for fire protection in a given area, and is normally measured in gallons per minute (gpm), as well as duration of flow. The quantity of water necessary for fire protection varies by land use type, life hazard, occupancy, and the degree of fire hazard. Water for firefighting would be provided by the City's water supply system. This system currently includes a ten-inch water line in the Atlantic Avenue right-of-way, which extends west along Mason Street and connects to an eight-inch line and eventually to a 4-inch line at Annetta Avenue. In addition, a ten-inch line also extends in a north-south direction along the alley behind the Atlantic Avenue frontage. East of Atlantic Avenue, a 10-inch water line extends westward along Firestone Boulevard and then turns north along the east site of Atlantic Avenue, where it is reduced to an 8-inch line. It should be noted that existing demand for fire protection services is considered negligible as most of the site is vacant and has not been utilized for over a decade.

3G.3 Applicable Regulations

City of South Gate General Plan. In compliance with Senate Bill (SB) 1841, the City of South Gate General Plan includes Section 6.0, *Hazards Management*, which contains goals and policies for public safety in the City. Currently, the City of South Gate is in the process of updating its General Plan.⁴ The following goals and policies related to fire protection are applicable:

Goal 2: Support the efforts of the Los Angeles County Fire Department in the prevention and suppression of fires.

² County of Los Angeles Fire Department, Station No. 54, response to ESA's letter submitted to Captain John Mancha (Los Angeles County Fire Department Fire Station 54) on May 27, 2008.

³ *Ibid.*

⁴ City of South Gate, General Plan Update, Website: <http://www.sogate.org/index.cfm/fuseaction/Detail/CID/101/NavID/60/>, accessed June 17, 2008.

Policy 2.1: Insure that the public and private water distribution and supply facilities have adequate capacity to meet both the water supply needs of the community and the required fire flows.

Policy 2.3: The Fire Department will be included in the environmental review process of any large development to insure that fire prevention and suppression features have been considered in the overall design.

Policy 2.5: The Fire Department must be provided those facilities that are deemed necessary to enable it to provide the services at levels desirable to both the City and the County.

The Hazards Management Element also includes Figure 6-1, Emergency Preparedness Plan, which identifies evacuation routes, emergency shelters, secondary aid stations, fire stations, and the police headquarters emergency operation center, etc.

3G.4 Impacts and Mitigation Measures

Methodology

The traffic study that was conducted for the proposed project entailed an analysis of the volume of project-generated traffic and the impact that project-generated traffic would be expected to have on levels of service at intersections in the area surrounding the project site. To determine if the proposed project would result in substantial adverse physical impacts to fire protection and require a new or physically altered facility to maintain acceptable service ratios, an evaluation of the proposed project's contribution to the local traffic, population, changes to fire-flow facilities, and changes in emergency access patterns were evaluated.

In addition, LACFD provided input regarding potential impacts to Fire Station No. 54 as a result of the proposed project.⁵ Input was received in response to a written request to the LACFD by ESA, sent on May 27, 2008. The letter from ESA provided a description of the proposed project, and requested information regarding Fire Station No. 54's existing fire protection services, including facilities, equipment, personnel, and response times, as well as an assessment of the proposed project's effect on these services.

Criteria for Determining Significance

The criterion used to determine the significance of an impact is based on the model Initial Study checklist in Appendix G of the *CEQA Guidelines*. The proposed project may result in significant impacts if it would:

⁵ County of Los Angeles Fire Department, Station No. 54, response to ESA's letter submitted to Captain John Mancha (Los Angeles County Fire Department Fire Station 54) on May 27, 2008.

- Result in substantial adverse physical impacts resulting in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times or other performance objectives.

Project Impacts

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A of the DEIR 2008 of this August 2009 FEIR).

Impact 3G.1: Result in substantial adverse physical impacts resulting in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.

Fire Protection Facilities and Services

Less Than Significant Impact. Impacts to fire service providers can occur as a result of an increase in the size of the population and geographic area served; the number and types of service calls; physical development; or a conflict with any applicable plan, policy, or regulation of an agency responsible for provision of fire services.⁶ Currently, the proposed project site is primarily vacant with the exception of one warehouse and four modular storage buildings, which are planned for demolition in conjunction with the proposed project. The proposed project would include the addition of approximately 145,000 square feet of building space. Three separate classroom facilities would be constructed as part of the proposed project, which would have the capacity to accommodate up to 1,431 students. Additional school facilities would be located in between the classroom facilities and would include a 10,000-square foot multipurpose room, a music and drama hall, a gymnasium, and an administration building. In addition, a 133-space surface parking lot would be located on the western portion of the site. The proposed school would be separated from adjacent residential properties to the north by an eight-foot wall.

The proposed project would add an additional day-time population of 1,431 individuals to the service area of Battalions 13 and 20 of the LACFD, which would decrease the ratio of fire personnel to its service population slightly, as a result of the proposed project. In addition the proposed project would likely increase the demand for fire protection services above existing levels. However, as indicated in the Program, the new student enrollment for the proposed project, as well as for all other proposed LAUSD schools in the Program, is within regional SCAG and U.S. Census population projections.⁷ Given that the purpose of the Program is to provide relief to overcrowded schools and maintain adequate public school facilities, the Program is considered growth-accommodating rather than growth inducing. Therefore, the Program as a whole would not create an increase in the population served by each fire protection provider such that the proposed project would directly result in the need for new or expanded fire protection services or facilities. Furthermore, as indicated by the LACFD, the overall increase in demand to the LACFD stations serving the proposed project resulting from the change in on-site population

⁶ LAUSD, OEHS New School Construction Program, Draft PEIR, March 2004, pp. 3.15-15 and 3.15-16.

⁷ *Ibid.*

density would result in less than significant impacts to the LACFD.⁸ As indicated by the LACFD, the proposed project would not require new or expanded fire protection facilities in order to serve the proposed project site.⁹

The proposed project would conform to applicable county and state codes and ordinances, as well as guidelines related to fire protection for school uses. Fire protection requirements mandated by the Fire Code include the specification of fire hydrant spacing from vehicles and lot frontages, as well as requirements for additional fire hydrants should spacing exceed acceptable distances. In addition, the Fire Code contains specific requirements regarding emergency vehicle turning radii in designated fire lanes. Project development would include several proposed design features that would enhance site safety and support fire-fighting activity. These include, but are not limited to, ease of access, facilities for emergency vehicles on site, smoke detectors, fire alarms, sprinklers, emergency lighting, and emergency exits. LAUSD would submit all site plans to LACFD for review per LAUSD's Design Standards (see Section 2.3, *Project Design Features* under Chapter 2.0, *Project Description* of this Recirculated DEIR. Therefore, project impacts on fire protection facilities and services would be less than significant.

Emergency Access and Fire Flow

Less Than Significant Impact. The Traffic Impact Analysis for the proposed project (see Appendix D of the DEIR 2008) found that the project would add traffic to surrounding intersections and street segments; however, the traffic increase would not significantly change existing service levels for fire protection. As analyzed in Section 3H, *Traffic and Transportation*, traffic impacts would be less than significant for the intersection at Atlantic Avenue and Firestone Boulevard and at the residential roadway segments, through implementation of Mitigation Measures TRK-1 and TRK-2. However, traffic impacts would be significant and unavoidable at the intersections of Rayo Avenue at Firestone Boulevard; Atlantic Avenue at Wood Avenue; Atlantic Avenue at Tweedy Boulevard; and Wright Avenue at Atlantic Avenue.

According to LACFD, responding units would leave Station No. 54 and would take Southern Avenue to Hildreth Avenue or Annetta Avenue. Although the proposed project would have significant and unavoidable traffic impacts at four intersections, LAUSD's Design Standards would require that a Site Plan for Emergency Access be submitted to LACFD in order to determine impacts to site access resulting from the proposed project. The applicant would coordinate with LACFD during the development of the plans in order to ensure that any emergency vehicles and equipment would be accessible to all buildings during both construction and operation of the project. Therefore, neither construction nor operation of the proposed project is expected to adversely impact the response times or emergency access of any local fire protection agencies.

Construction activities associated with the proposed project could temporarily impact the level of service on the streets surrounding the project site. However, to further ensure that impacts to response times are less than significant, LAUSD's Construction BMPs would require that all

⁸ County of Los Angeles Fire Department, Station No. 54, response to ESA's letter submitted to Captain John Mancha (Los Angeles County Fire Department Fire Station 54) on May 27, 2008.

⁹ *Ibid.*

project contractors submit a construction worksite traffic control plan to the City of South Gate for review (refer to section 2.3, *Project Design Features*). This plan would identify the location of any haul routes, construction hours, protective devices, warning signs, and access to abutting properties.

Construction of the proposed project would comply with applicable state and local fire codes, ordinances, and plans, including the Fire Code. The Fire Code includes specification of building materials and accessibility requirements for LACFD equipment, as well as specification regarding the installation of interior automatic sprinkler systems pursuant to the *2001 Edition of the California Fire Code*, as published by the California Building Standards Commission. Therefore, construction activities associated with the proposed project would not significantly impact the response time or emergency access of the local fire protection agencies.

Fire-flow needs would continue to be met by existing or upgraded water lines currently servicing the project site. All on-site water systems, fire hydrant types, and locations, would be designed to meet fire flow requirements established by LACFD based on adjoining land uses. To ensure on-site features comply with all fire flow requirements, LAUSD would submit site plans to the LACFD for review per LAUSD's Design Standards (see Section 2.3, *Project Design Features*). In addition, according to LACFD, the proposed project would also need to adhere to several design standards that specify set distances between emergency vehicular access and parking and public fire hydrants, which would ensure that the proposed project would meet the fire flow requirements established in the *2001 Edition of the California Fire Code* and by the Fire Code. The proposed project would be required to comply with *Fire Department and Department of Building and Safety* regulations for water availability and accessibility to fire fighting equipment to minimize any threat of a fire, as well as to comply with standard design requirements in accordance with the Uniform Building Code (UBC). Furthermore, LAUSD's Design Standards also require that LACFD review and approve the location of all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting LACFD's access prior to the State Fire Marshal's final approval. Providing a full site plan and emergency access plan for LACFD review would reduce any adverse impacts to fire flows or potential direct physical impacts to fire protection services in connection with proposed project.

In summary, the proposed project would not disrupt existing fire protection response times or access to the proposed project site (as analyzed above), and would comply with all applicable fire protection requirements including the Fire Code. Implementation of project design features would ensure that all site plans, construction schedules, fire flows, and emergency access routes are reviewed by the LACFD prior to approval of the proposed project. In addition, as indicated by LACFD, the proposed project would not result in the need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives.¹⁰ Therefore, the proposed project would have a less than significant impact on fire protection services and performance objectives for the area.

¹⁰ *Ibid.*

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

3G.5 Cumulative Impacts

Impact 3G.2: Result in a cumulatively considerable impacts to fire protection services.

Less Than Significant Impact. Related projects in the surrounding area are outlined in Table 2-1 (please refer to Chapter 2.0, *Project Description*). As demonstrated in Figure 2.6, there are six related projects in the vicinity of the project site that may result in cumulatively considerable impacts on fire protection services when considered in conjunction with the proposed project. The related projects identified in Table 2-1 would have a significant cumulative impact on fire service if they would result in an overall increase in population, in traffic, or in structures requiring fire protection service and subsequent need for new or altered facilities. Related projects may require additional fire personnel and equipment at fire stations serving the area in order to accommodate the increase in demand for fire protection services resulting from cumulative development. However, as described above in Impact 3G.1, the proposed project would not result in direct project-related impacts to LACFD Station No. 54 or any other LACFD station serving the proposed school site with the implementation of mitigation measures. Therefore, while cumulative growth to the area may require new and expanded fire protection facilities, the proposed project's cumulative contribution to fire protection impacts would be less than significant. Furthermore, all related projects in Table 2-1 would also be required to undergo CEQA evaluation in order to identify all potential impacts to fire services, as well as devise mitigation measures that would reduce all adverse impacts to less than significant levels. As such, the proposed project would not contribute to a cumulatively considerable impact on fire services. Cumulative impacts for the proposed project would be considered less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Residual impacts would be less than significant.

CHAPTER 3H

Traffic

3H.1 Introduction

This chapter discusses potential impacts on transportation and parking facilities resulting from the proposed project. The analysis is based on the results of a traffic impact analysis conducted by KOA Corporation for the proposed project, in accordance with the *Guidelines for Traffic Impact Analysis Reports*¹ and the MOU between LAUSD and the City of South Gate.² The complete traffic study is provided in Appendix ~~DJ~~ of the ~~DEIR 2008~~ of this August 2009 FEIR.

3H.2 Existing Environmental Setting

Existing Transportation Network

Street Network and Study Area

The transportation network in the study area is comprised of a grid of arterial and collector streets, and roadways. The following streets form boundaries to the proposed project site: Wood Avenue located to the north, Aldrich Road located to the south, and Atlantic Avenue located to the west. These streets are described in greater detail below. **Figure 3H.1** shows the location of these streets in relationship to the proposed project. The following roadways are located within the study area:

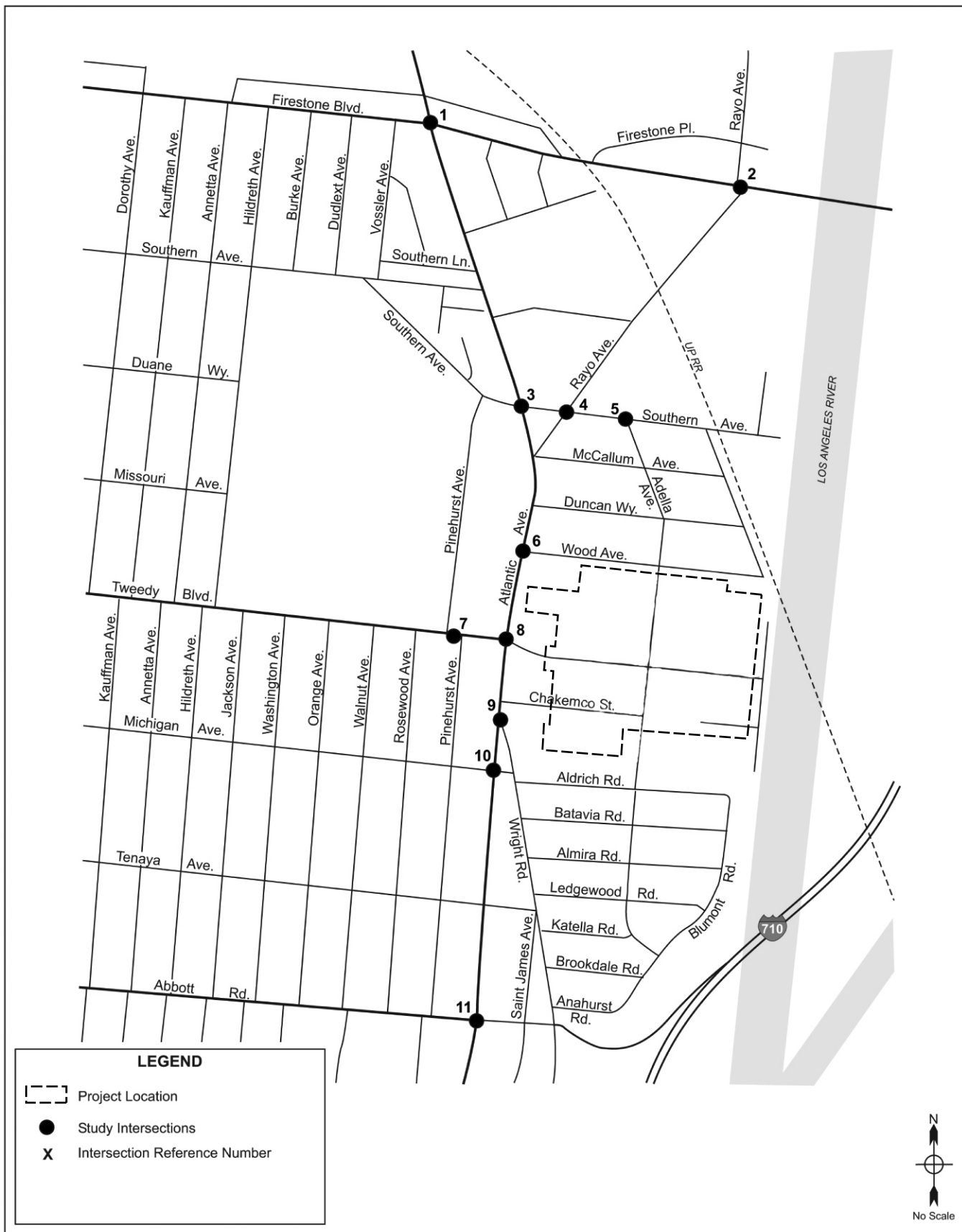
Firestone Boulevard: Within the study area, Firestone Boulevard is an east-west Primary Arterial providing two to three travel lanes in each direction. On-street parking on Firestone Boulevard is permitted at locations with four travel lanes and prohibited at locations with six travel lanes. The speed limit is 35 miles per hour (mph). A protected railroad crossing is located on Firestone Boulevard at its intersection with Firestone Place.

Southern Avenue: Within the study area, Southern Avenue is an east-west roadway providing one travel lane in each direction, with a striped median. On-street parking is permitted, and the speed limit is 25 mph.

Tweedy Boulevard: Within the study area, Tweedy Boulevard is an east-west roadway. West of Atlantic Avenue, Tweedy Boulevard provides two travel lanes in each direction, with a striped median, parking is permitted, and the speed limit is 30 mph.

¹ KOA Corporation, *Traffic Study for Los Angeles Unified School District South Region High School # 9, July 1, 2008*.

² City of South Gate and KOA Corporation, *Memorandum of Understanding*, April 7, 2006.



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02

Figure 3H.1
Locations of Study Intersections and
Roadway Segments

East of Atlantic Avenue, Tweedy Boulevard provides one travel lane in each direction; on-street parking is permitted, and the speed limit is not posted.

Pinehurst Avenue: Within the study area, Pinehurst Avenue is a north-south roadway providing one travel lane in each direction, with a striped median. On-street parking is permitted along the street, and the speed limit is 25 mph.

Atlantic Avenue: Within the study area, Atlantic Avenue is a north-south Primary Arterial providing two travel lanes in each direction, with a striped median. On-street parking is permitted along the street, but limited to two hours. The speed limit is 35 mph.

Rayo Avenue: Within the study area, Rayo Avenue is a north-south roadway providing one travel lane in each direction with a striped median. On-street parking is permitted along the street.

Wright Road: Within the study area, Wright Road is a north-south roadway providing one travel lane in each direction, with a striped median. On-street parking is permitted along the street, and the speed limit is 35 mph.

Wood Avenue: Within the study area, Wood Avenue is an east-west roadway providing one travel lane in each direction. On-street parking is permitted along the street.

Michigan Avenue: Within the study area, Michigan Avenue is an east-west roadway providing one travel lane in each direction. On-street parking is permitted along the street.

Aldrich Road: Within the study area, Aldrich Road is an east-west roadway providing one travel lane in each direction. On-street parking is permitted along the street.

Orange Avenue: Within the study area, Orange Avenue is a north-south roadway providing one travel lane in each direction. On-street parking is permitted along the street.

Adella Avenue: Within the study area, Adella Avenue is a north-south roadway providing one travel lane in each direction. On-street parking is permitted along the street.

Existing Transit Operations

The project study area is served by bus transit lines operated by the Los Angeles County Metropolitan Transit Authority (MTA). The proposed project is served by multiple transit lines with stops located within walking distance of the proposed project site:

MTA Line 260/361 operates as a regional bus route that provides service between the cities of Altadena and Compton. Buses on this line travel along Atlantic Avenue within the study area. The line provides bus service at designated stops approximately every nine minutes during the weekday peak periods.

MTA Line 115/315 operates as a regional bus route that provides service between Playa del Rey and the City of Norwalk. Buses on this line travel along Firestone Boulevard within the study area. The line provides service designated stops approximately every ten minutes during the weekday peak periods.

MTA Line 117 operates as a regional bus route that provides service between Los Angeles International Airport (LAX) and the City of Downey. Buses on this line travel along Tweedy Boulevard and Atlantic Avenue within the study area. The line provides service designated stops approximately every 20 minutes during the weekday peak periods.

MTA Line 612 operates as a regional bus route that provides service between Willowbrook and Huntington Park through the City of Southgate. Buses on this line travel along Abbott Road and Atlantic Avenue within the study area. The line provides service to designated stops approximately every 40 minutes during the weekday peak period.

Existing Area Traffic Conditions

Eleven intersections in the project vicinity were analyzed with regard to potential traffic impacts that could result from the implementation of the proposed project.³ **Figure 3H.2** depicts the lane configurations and traffic controls at the study intersections. Six of the eleven study intersections are controlled by traffic signals. The 11 study intersections are:

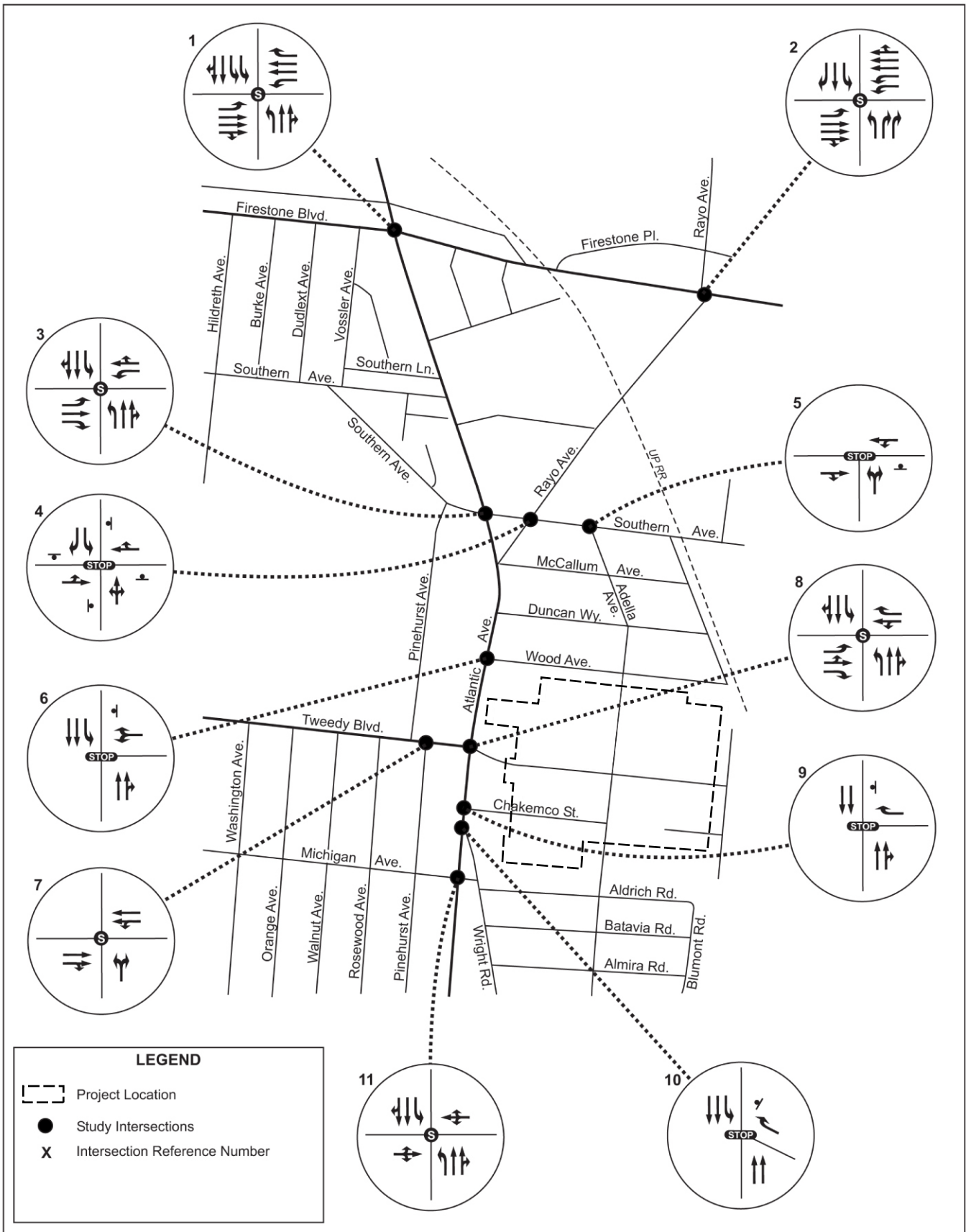
1. Atlantic Avenue and Firestone Boulevard;
2. Rayo Avenue and Firestone Boulevard;
3. Atlantic Avenue and Southern Avenue;
4. Rayo Avenue and Southern Avenue;
5. Adella Avenue and Southern Avenue;
6. Atlantic Avenue and Wood Avenue;
7. Pinehurst Avenue and Tweedy Boulevard;
8. Atlantic Avenue and Tweedy Boulevard;
9. Atlantic Avenue and Chakemco Street;
10. Wright Road and Atlantic Avenue, and
11. Atlantic Avenue and Michigan Avenue.

Additionally, although the City of South Gate does not have thresholds for roadway segment impacts, the following residential roadway segments were analyzed using the City of Los Angeles thresholds developed by LADOT:

1. Adella Avenue, north of Wood Avenue;
2. Wood Avenue, west of Adella Avenue, and.
3. Tweedy Boulevard, east of Atlantic Avenue.

These intersections and roadway segments surround the proposed project site or are located on potential routes to the proposed school (as determined by the projected attendance area), and as such, are the intersections most likely to be directly impacted by traffic generated by the proposed project.

³ KOA Corporation, *Traffic Study for Los Angeles Unified School District South Region High School # 9, July 1, 2008.*



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02

Figure 3H.2
Intersection Lane Configuration and Controls

Study Methodology

The Transportation Research Board Critical Movement Analysis (CMA) Circular 212 method was used to analyze traffic operating conditions at study intersections. The CMA analysis planning method for evaluating signalized intersections involves the computation of volume-to-capacity (V/C) ratios for each critical movement. Capacity, or saturation flow rate, is defined as the maximum rate of flow that can pass through a given intersection approach under prevailing traffic and roadway conditions. An intersection is “at capacity” (V/C of 1.00 or greater) when extreme congestion occurs. This V/C ratio value is based upon volumes by lane, signal phasing, and approach lane configuration.

Level of Service (LOS) values range from A to F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating “capacity” of a roadway. LOS D is typically the lowest acceptable operating condition. **Table 3H-1** defines each LOS and provides the corresponding V/C ratios for signalized intersections.

**TABLE 3H-1
INTERSECTION LOS DEFINITIONS**

LOS	Interpretation	Signalized Intersection V/C Ratio (ICU)
A	Excellent. No vehicle waits longer than one red light and no approach phase is fully used.	0.000 - 0.600
B	Very good. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601 - 0.700
C	Good. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701 - 0.800
D	Fair. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801 - 0.900
E	Poor. Represents the most vehicles that intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901 - 1.000
F	Failures. Backups from nearby intersections or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	Greater than 1.000

SOURCE: City of Los Angeles, *Traffic Studies Policies and Procedures*, November 1993.

For the two-way stop controlled study intersections, LOS is evaluated using stop-controlled methodologies from the *2000 Highway Capacity Manual*.⁴ Under this methodology, intersection conditions are based upon intersection delay, which is defined as the average delay in seconds experienced by users of the intersection who must stop or yield to uncontrolled through traffic. This method uses a “gap acceptance” technique to predict driver delay. This methodology is applicable to unsignalized intersections on major streets where there is potential for difficulty for cross traffic due to heavy traffic volumes on the major street.

⁴ Transportation Research Board of the National Academies. *2000 Highway Capacity Manual*. March 4, 2003.

Existing Intersection Levels of Service

Based on traffic counts taken at the study intersections, a V/C ratio and corresponding LOS was determined for each of the study intersections, as shown in **Table 3H-2**, for existing (2007) conditions.

**TABLE 3H-2
SUMMARY OF INTERSECTION PERFORMANCE—EXISTING (2007) CONDITIONS**

Intersection Location	Weekday AM Peak		Weekday PM Peak	
	V/C or Delay	LOS	V/C or Delay	LOS
1. Atlantic Avenue and Firestone Blvd.	1.031	F	1.039	F
2. Rayo Avenue and Firestone Blvd.	1.006	F	1.049	F
3. Atlantic Avenue and Southern Avenue	0.527	A	0.626	B
4. Rayo Avenue and Southern Avenue	16.2 sec.	C	16.6 sec.	C
5. Adella Avenue and Southern Avenue	9.0 sec.	A	9.2 sec.	A
6. Atlantic Avenue and Wood Avenue	75.0 sec.	F	75.1 sec.	F
7. Pinehurst Avenue and Tweedy Blvd.	18.6 sec.	C	21.4 sec.	C
8. Atlantic Avenue and Tweedy Blvd.	0.830	D	0.943	E
9. Atlantic Avenue and Chakemco Street	14.1 sec.	B	13.6 sec.	B
10. Wright Road and Atlantic Avenue	54.2 sec.	F	28.7 sec.	D
11. Atlantic Avenue and Michigan Avenue	0.416	A	0.492	A

^[a] Stop-controlled intersection, average delay; LOS was calculated based on the 1,200 capacity utilizing the Circular 212 methodology.

SOURCE: KOA, *Traffic Study for LAUSD South Region High School #9 Project*, July 2, 2008.

As shown on Table 3H-2, six of the 11 study intersections operate at an acceptable LOS (LOS D or better) under existing (2007) conditions. The traffic analysis worksheets for the existing conditions scenario are provided in Appendix **DJ of this August 2009 FEIR**. The following intersections are operating at acceptable levels of service:

- Atlantic Avenue and Southern Avenue;
- Rayo Avenue and Southern Avenue;
- Adella Avenue and Southern Avenue;
- Pinehurst Avenue and Tweedy Boulevard;
- Atlantic Avenue and Chakemco Street; and
- Atlantic Avenue and Michigan Avenue.

The following intersections are operating at unacceptable levels of service (LOS E or F):

- Atlantic Avenue and Firestone Boulevard (LOS F at both AM and PM peak hours);
- Rayo Avenue and Firestone Boulevard (LOS F at both AM and PM peak hours);
- Atlantic Avenue and Wood Avenue (LOS F at both AM and PM peak hours);
- Atlantic Avenue and Tweedy Boulevard (LOS E at PM peak hour); and
- Wright Avenue and Michigan Avenue (LOS F at AM peak hour).

3H.3 Applicable Regulations

California Department of Transportation (Caltrans). The California Vehicle Code establishes height, weight, length, and width restrictions for vehicles and their loads.⁵ Vehicles or loads that exceed these limitations are considered oversize and require a special permit to operate on the state highway system. The Code authorizes Caltrans to issue special permits for the movement of these oversize vehicles along specified routes on the state highway system. The Code authorizes county and city governments, such as the City of South Gate (City), to issue special permits for movement of oversize vehicles through their jurisdictions.

City of South Gate General Plan. The Infrastructure Element of the City of South Gate General Plan identifies goals, objectives, and policies regarding traffic and circulation in the City. The following policies and objectives regarding traffic and circulation are relevant to the project:

Goal 1: To provide a plan for a coordinated street circulation system for the safe and efficient movement of people and goods.

Policy 1.1: The City will develop a street circulation system that is capable of adequately serving any reasonably expected increase in future traffic.

Policy 1.3: Alternate transportation modes must be encouraged through every means available to promote such use.

Policy 1.4: The City will create a safe and convenient circulation system for pedestrians.

Policy 1.6: The needs of the handicapped will be considered in all development plans.

Policy 1.8: Private and public parking shall be provided in sufficient amount to adequately meet the local needs and to minimize congestion on arterial streets.

County of Los Angeles. New projects within the County of Los Angeles must comply with the CMP for Los Angeles County that was adopted by the MTA in November 1995 pursuant to state law.⁶ The CMP involves monitoring traffic conditions and performance measures on the designated transportation network, analysis of the impact of land use decisions on the transportation network, and mitigation to reduce impacts on the transportation network.

Appendix D of the CMP includes Transportation Impact Assessment (TIA) guidelines.⁷ The TIA guidelines require analysis at monitored street intersections and segments, including freeway on- and off-ramp intersections where a project is expected to add 50 or more peak hour vehicle trips and mainline freeway or ramp monitoring locations where a project is expected to add 150 or more peak hour trips. If a project does not add, but merely shifts trips at a given monitoring location, CMP analysis is not required.

⁵ California Department of Motor Vehicles, *California Vehicle Code Section 35000*, January 2005.

⁶ MTA, *Congestion Management Program (CMP) for Los Angeles County, Appendix D*, November 1995.

⁷ *Ibid.*

3H.4 Impacts and Mitigation

Methodology

The baseline for the analysis of the proposed project and proposed project alternatives in this Recirculated EIR is based on the traffic impact analysis prepared for the proposed project site (see Appendix ~~DJ~~ of the DEIR 2008 of this August 2009 FEIR.)⁸ Potential impacts are described in terms of increases to the capacity of the roadway, variation in LOS, and cumulative effects.

Criteria for Determining Significance

Specific threshold criteria were used to determine if implementation of a project could result in a significant traffic impact. Using these criteria, a proposed project may result in a significant impact on intersection capacity if the estimated project traffic would increase the V/C ratio under one or more of the following conditions⁹:

- The V/C ratio increase is equal to or greater than 0.040 and the final LOS (defined as projected future conditions including project, ambient, and related project growth but without project traffic mitigation) is C;
- The V/C ratio increase is equal to or greater than 0.020 and the final LOS is D; or
- The V/C ratio increase is equal to or greater than 0.010 and the final LOS is E or F.

Additionally, the proposed project may result in potentially significant impacts relating to traffic if it would:

- Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections);
- Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways;
- Result in inadequate parking capacity; or
- Result in a cumulatively considerable impact with respect to traffic.

Project Impacts

The environmental impact analyses presented below are based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A for the Initial Study).

Impact 3H.1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).

⁸ KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008.

⁹ LADOT, *Traffic Impact Analysis Reports*, January 1997.

Significant and Unavoidable with Mitigation Incorporated. To evaluate the potential impacts of the proposed project on local traffic conditions, a forecast of future traffic volumes in the study area under conditions without the proposed project was developed. This forecast provides a basis against which to measure the proposed project's traffic impacts.

Future No-Project Traffic Conditions

The anticipated build-out year of the proposed project, when the proposed high school would be in full operation, is 2012. The projection of 2012 no-project traffic without the project consists of existing traffic plus ambient traffic growth (general background regional growth) plus growth in traffic generated by specific cumulative (related) projects expected to be completed by 2012.

Ambient Traffic Growth

Ambient traffic growth is the rate that traffic would occur in the study area due to general employment growth, housing growth, and regional growth. Even with no change in housing or employment in the City, there would be some background (ambient) traffic growth in the region. For the analysis of background traffic during the project year, an annual traffic growth rate factor of 1.05 was applied to the existing traffic volumes. This simulates a one percent annual increase over the five-year period between existing conditions (year 2007) and future (year 2012) conditions. This rate was included in the Memorandum of Understanding (MOU) submitted to the City of South Gate.¹⁰

Cumulative Project Traffic Growth

Cumulative project traffic growth, which is growth due to known development projects in the City, is also included in the analysis of 2012 no-project conditions. Based on coordination with planning staff at the City of South Gate, a total of six projects that could affect traffic circulation were identified within the study area. These projects are listed in Table 2-1, and the location of these projects is shown on Figure 2.6 of the Project Description of this EIR.

2012 Without Project Traffic Conditions

Based on the forecast parameters discussed above, peak-hour traffic volumes were estimated for the 2012 without the proposed project. The results of the LOS analysis for this scenario are shown in **Table 3H-3**. As shown in Table 3H-3, when compared to existing conditions, operations at the intersections of Adella Avenue at Southern Avenue and Atlantic Avenue at Michigan Avenue would remain at LOS A for both the AM and PM peak hours with the addition of traffic generated by ambient growth and related projects. Operations at the intersection of Rayo Avenue and Southern Avenue would remain at LOS C for both the AM and PM peak hours. In addition, operations at the intersections of Atlantic Avenue and Firestone Boulevard, Rayo Avenue and Firestone Boulevard, and Atlantic Avenue and Wood Avenue would continue to operate at an unacceptable

¹⁰ KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, June 6, 2008.

**TABLE 3H-3
INTERSECTION PERFORMANCE –
FUTURE (YEAR 2012) AMBIENT GROWTH + RELATED PROJECTS**

Intersection Location	Weekday AM Peak		Weekday PM Peak	
	V/C or Delay sec	LOS	V/C or Delay sec	LOS
1. Atlantic Avenue and Firestone Blvd.	1.252	F	1.521	F
2. Rayo Avenue and Firestone Blvd.	1.122	F	1.298	F
3. Atlantic Avenue and Southern Avenue	0.613	B	0.768	C
4. Rayo Avenue and Southern Avenue [a]	18.6 sec	C	19.4	C
5. Adella Avenue and Southern Avenue [a]	9.0 sec	A	9.3	A
6. Atlantic Avenue and Wood Avenue [a]	>100 sec	F	>100 sec	F
7. Pinehurst Avenue and Tweedy Blvd. [a]	20.8 sec	C	26.2	D
8. Atlantic Avenue and Tweedy Blvd.	0.907	E	1.110	F
9. Atlantic Avenue and Chakemco Street [a]	15.7 sec	C	15.8 sec	C
10. Wright Road and Atlantic Avenue	99.9 sec	F	70.9 sec	F
11. Atlantic Avenue and Michigan Avenue [a]	0.458	A	0.581	A

[a] Intersection is unsignalized. Highway Capacity Manual Unsignalized methodology provides output based on average seconds of delay per approaching vehicle, influenced by the minor approaches.

SOURCE: KOA, *Traffic Study for LAUSD South Region High School #9*, June 6, 2008.

LOS F during the AM and PM peak hours. Operations at the intersection of Atlantic Avenue and Southern Avenue would deteriorate from LOS A during the AM peak hour to LOS B, and from LOS B during the PM peak hour to LOS C. The LOS at the intersection of Pinehurst Avenue and Tweedy Boulevard would remain at LOS C during the AM peak hour, and would decrease from LOS C to LOS D during the PM peak hour. Operations at the intersection of Atlantic Avenue and Tweedy Boulevard would deteriorate from LOS D during the AM peak hour and LOS E during the PM peak hours to LOS E and LOS F during the AM and PM peak hours, respectively. At the intersection of Atlantic Avenue and Chakemco Street, operations would deteriorate from LOS B to LOS C during both AM and PM peak hours. Operations at the intersection of Wright Road and Atlantic Avenue would remain at an unacceptable LOS F during the AM peak hour and would deteriorate from an acceptable LOS D to an unacceptable LOS F during the PM peak hour. The same five intersections that operate at an unacceptable LOS in the existing (2007) conditions would operate at an unacceptable LOS in the Future (2012) Pre-Project Condition. The remaining six would operate at an acceptable LOS.

Future with Project Traffic Conditions

Forecast Trip Generation of the Proposed Project

Trip generation for the proposed project land uses was calculated by utilizing the ITE *Trip Generation Manual*.¹¹ Application of these rates to existing land uses at the proposed project site

¹¹ LADOT and KOA. *Traffic Study for Los Angeles Unified School District South Region High School #9*. June 6, 2008.

(for reduction of net trip generation) and the proposed project land uses are summarized in **Table 3H-4**.

**TABLE 3H-4
PROPOSED PROJECT TRIP GENERATION ESTIMATES**

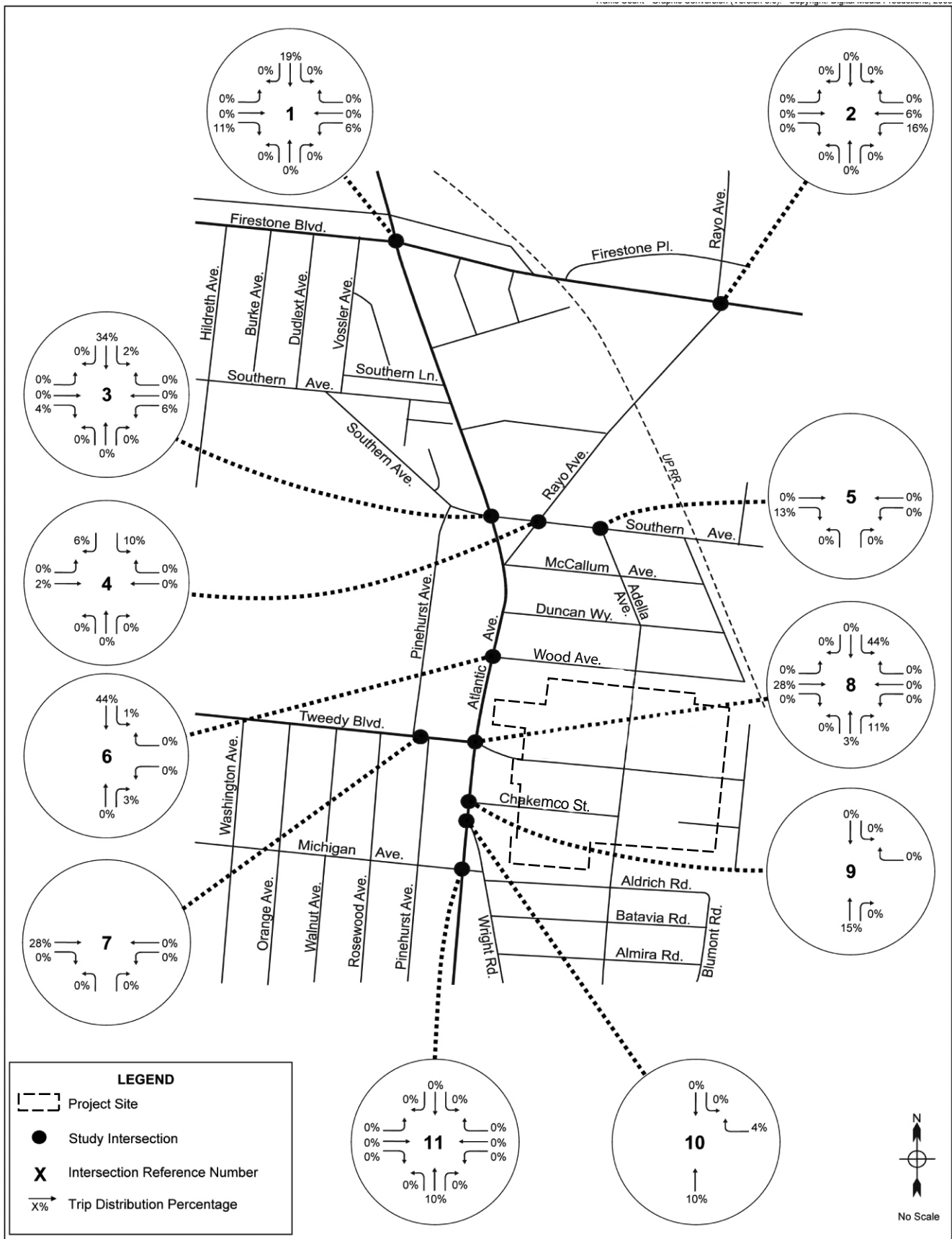
Land Use	Intensity	Units	Weekday AM Peak Hour			Weekday PM Peak Hour		
			Total	In	Out	Total	In	Out
Trip Generation Rates								
High School ^[1]		student	0.39	0.21	0.18	0.14	0.07	0.07
Adult School ^[2]		student	No AM operation			1 car per student, 45% driving		
Adult School ^[2]		staff	No AM operation			1 car per staff, 100% driving		
Forecast Trip Generation								
High School	1,431	students	588	301	257	200	94	106
Adult School ^[3]	450	students	0	0	0	215	205	10
	15	staff	0	0	0	15	15	0
TOTAL NET TRIPS			588	301	257	430	314	116

- [1] AM rates for high school derived from Memorandum of Cooperation (MOC), City of Los Angeles/LAUSD, June 2005; PM rates for high school taken from ITE Trip Generation. Student rates for the high school use provide total trips for students, staff, visitors, and other trips.
- [2] The adult school would only operate during the PM peak. Rates taken from survey results of Parking Demand Study at LAUSD Skills Center, conducted by Walker Parking Consultants, May 2004. Ratios of driving students and staff taken from study. Student out rate determined by "drop-off" category of survey – drop-off vehicles would depart the site during the same peak hour. Visitor trips were assumed to be equivalent to Skills Center facility.
- [3] For purposes of PM trip generation for adult school staff, 15 staff members were assumed to be traveling to the site in the PM peak hour. Support staff would arrive before the peak hour and are therefore not included in this total.

SOURCE: KOA, *Traffic Study for LAUSD South Region High School #9*, July 2, 2008.

The busing program for the proposed school would consist of two small buses. Trips generated by these vehicles within the peak hour were considered to be typical for schools of this type and are therefore incorporated into the trip generation rates. The bus trips would not create any new significant area trips, when considered apart from the overall project. Project trip distribution was based on the geographic distribution of the student population as well as knowledge of development trends in the area, local and sub-regional traffic routes, and regional traffic flows. Overcrowding relief would be provided to Bell High School, Huntington Park High School, South Gate High School, and Southeast High School. Thus, in the KOA study, trip distribution was focused to the north and northwest, where the schools to be relieved are located.¹² **Figures 3H.3** through **3H.6** show the intersection trip distribution percentages that were used for the project traffic volumes. **Figures 3H.7** and **3H.8** show the project trip assignment.

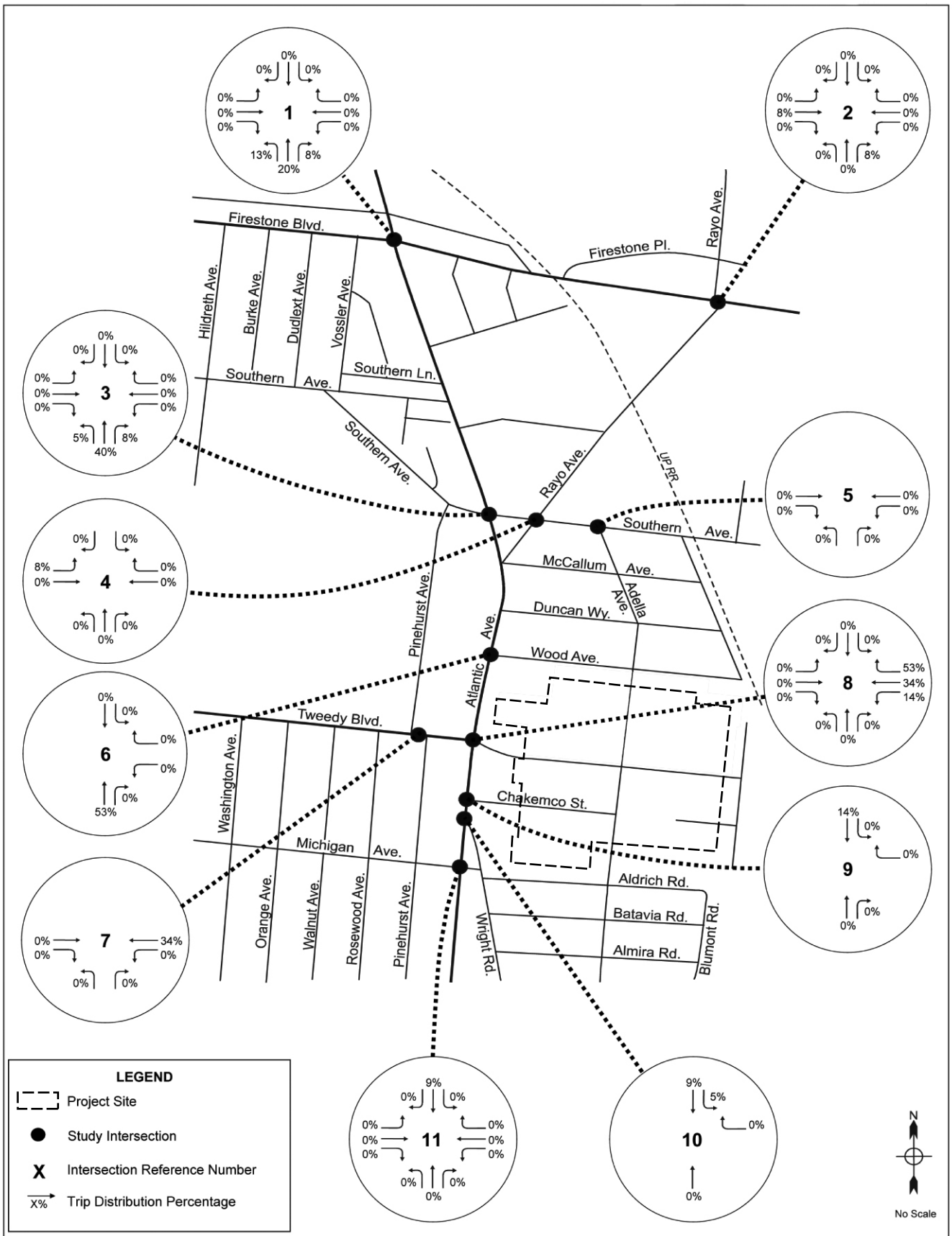
¹² KOA, *Traffic Study for Los Angeles Unified School District South Region High School #9*, July 2, 2008.



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02

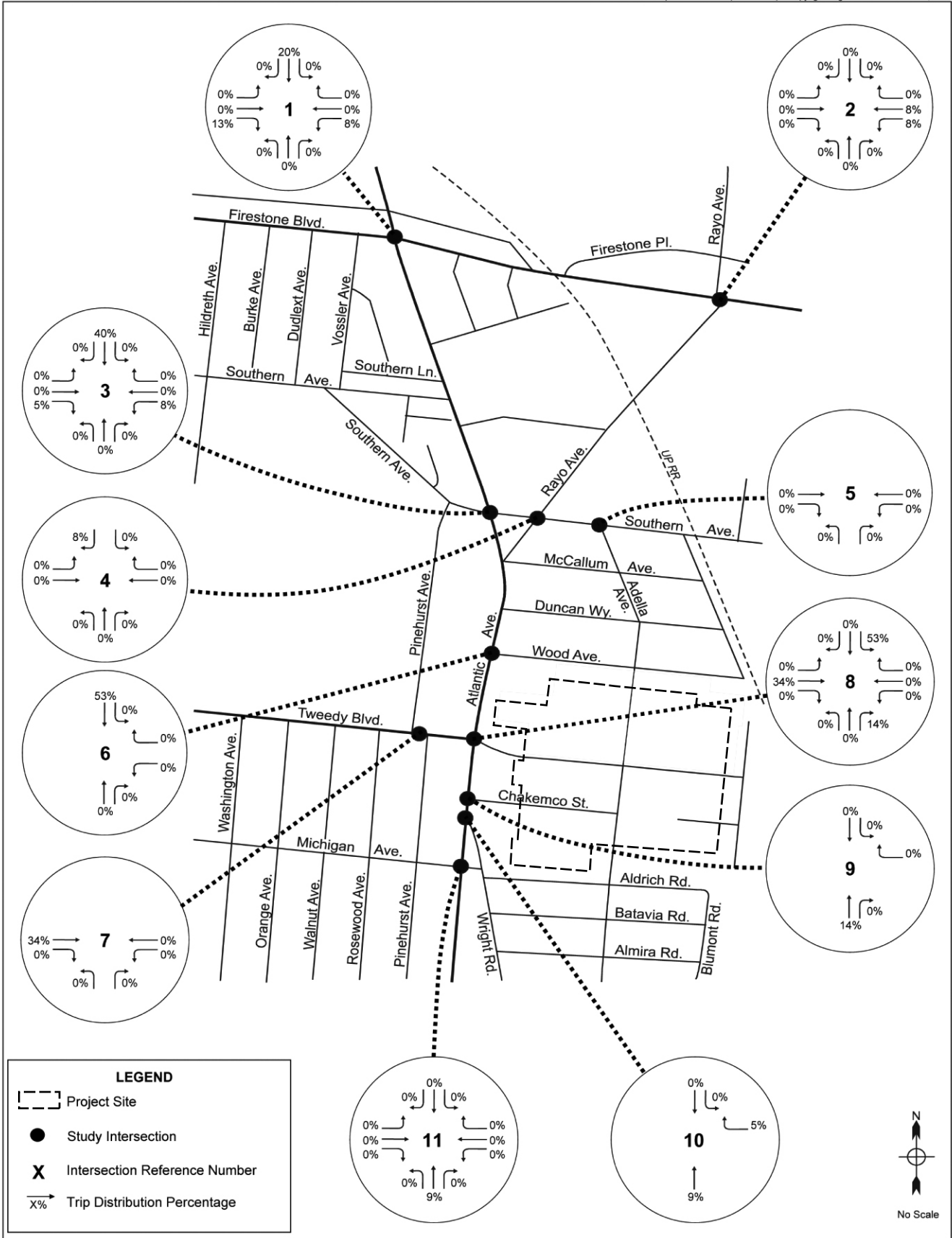
Figure 3H.3
Project Trip Distribution
AM Peak Hour - Inbound



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02

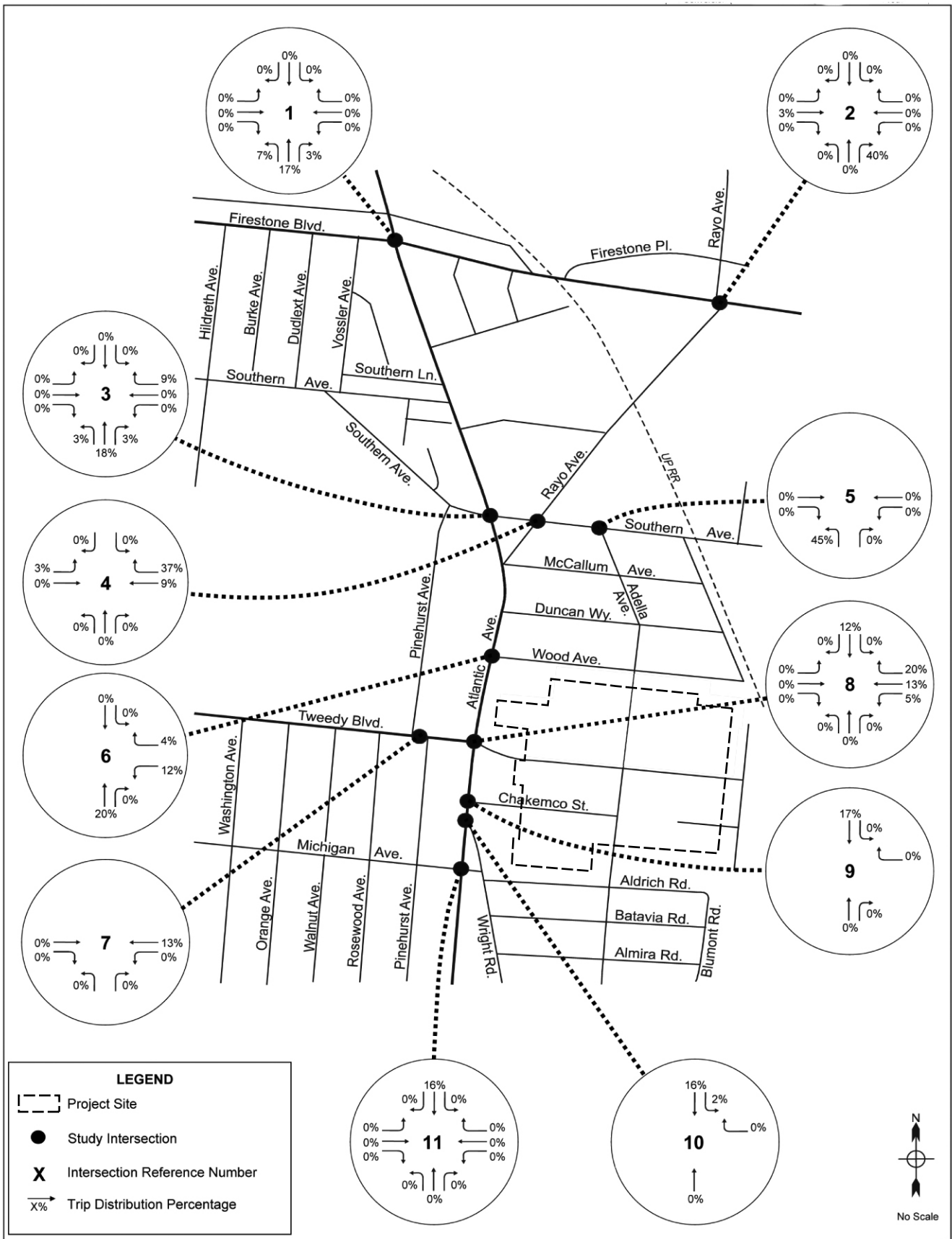
Figure 3H.4
Project Trip Distribution
AM Peak Hour - Outbound



SOURCE: KOA Corporation, 2008.

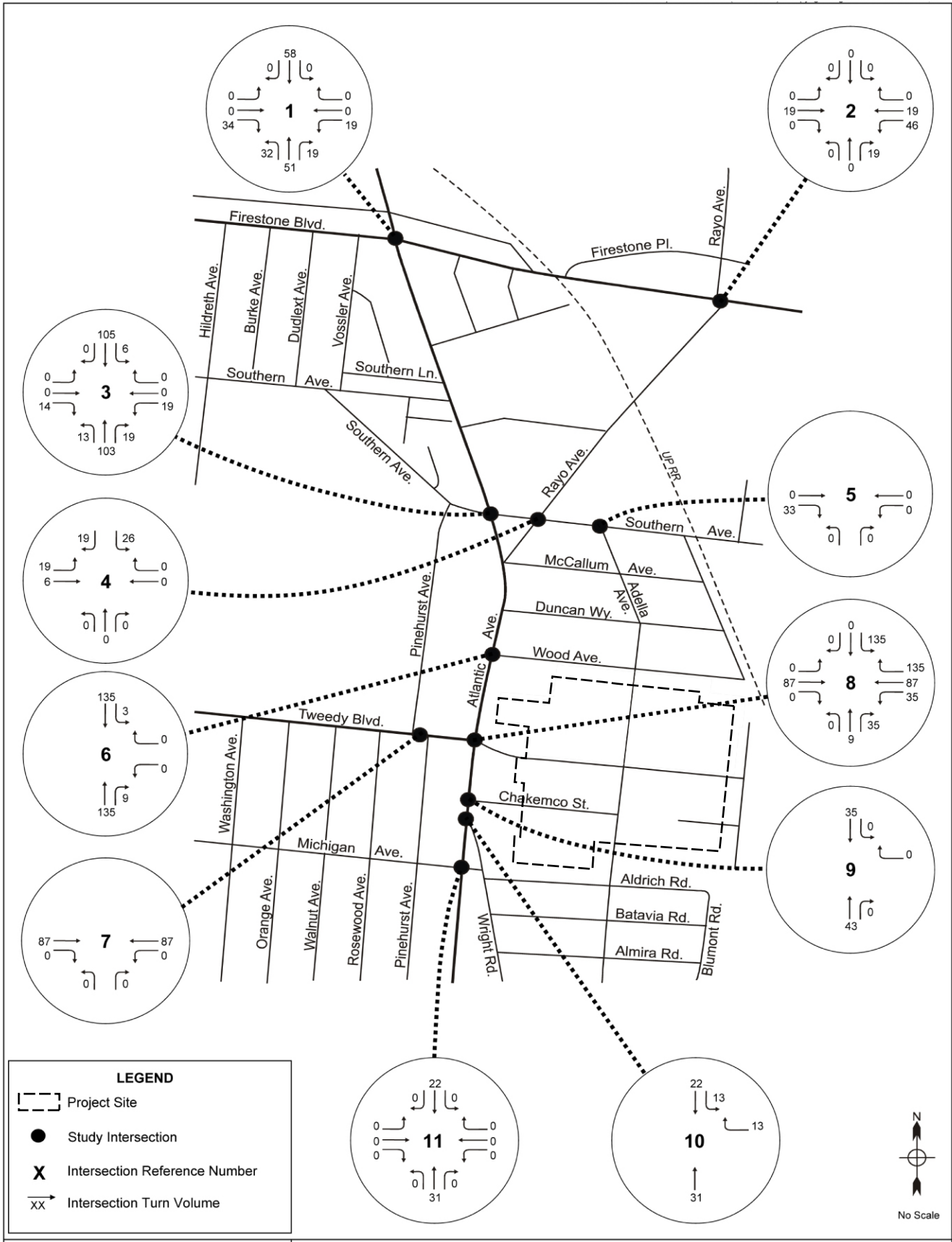
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Figure 3H.5
Project Trip Distribution
PM Peak Hour - Inbound



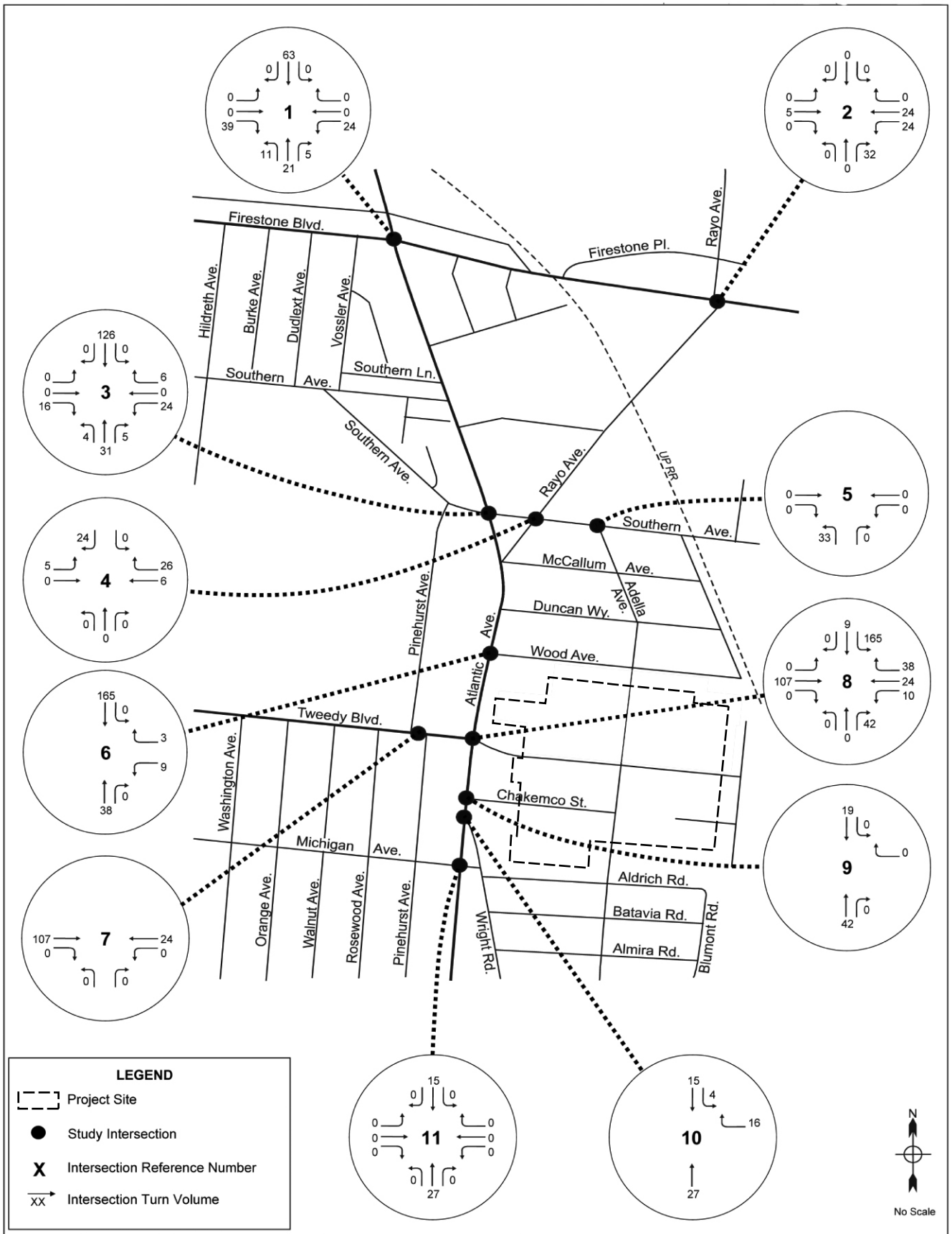
SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02
Figure 3H.6
Project Trip Distribution
PM Peak Hour - Outbound



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02
Figure 3H.7
 Project Trip Assignment
 AM Peak Hour



SOURCE: KOA Corporation, 2008.

LAUSD #9 . 206227.02
Figure 3H.8
 Project Trip Assignment
 PM Peak Hour

Future (Year 2012) Post-Project Conditions

Traffic volumes for these conditions were derived by adding project trips to the future traffic volumes generated by ambient growth. **Table 3H-5** provides a comparison of all the AM peak period study scenarios for the proposed project. **Table 3H-6** provides a comparison of all the PM peak period study scenarios for the proposed project. Traffic impacts are determined by comparing future ambient growth and related project conditions to future traffic conditions with the proposed project.

**TABLE 3H-5
DETERMINATION OF PROPOSED PROJECT IMPACTS – WEEKDAY AM PEAK PERIOD**

Intersection	Existing Conditions (Year 2007)		Future (Year 2012) Pre-Project Conditions		Future (Year 2012) Project Conditions		Diff.	Signif?
	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS		
Atlantic Avenue and Firestone Blvd.	1.031	F	1.252	F	1.278	F	0.026	Yes
Rayo Avenue and Firestone Blvd.	1.006	F	1.122	F	1.152	F	0.030	Yes
Atlantic Avenue and Southern Avenue	0.527	A	0.613	B	0.673	B	0.060	No
Rayo Avenue and Southern Avenue [a]	16.2 sec	C	18.6 sec 0.559	C	20.3 sec 0.590	C	0.031	No
Adella Avenue and Southern Avenue [a]	9.0 sec	A	9.0 sec 0.061	A	9.1 sec 0.083	A	0.022	No
Atlantic Avenue and Wood Avenue [a]	75.0 sec	F	>100 sec 0.591	F	>100 sec 0.638	F	0.047	Yes
Pinehurst Avenue and Tweedy Blvd. [a]	18.6 sec	C	20.8 sec 0.292	C	24.4 sec 0.321	C	0.029	No
Atlantic Avenue and Tweedy Blvd.	0.830	D	0.907	E	0.996	E	0.089	Yes
Atlantic Avenue and Chakemco Street [a]	14.1 sec	B	15.7 sec 0.527	C	16.0 sec 0.541	C	0.014	No
Wright Road and Atlantic Avenue	54.2 sec	F	99.9 sec 0.968	F	>100 sec 1.014	F	0.046	Yes
Atlantic Avenue and Michigan Avenue [a]	0.416	A	0.458	A	0.467	A	0.009	No

^[a] Intersections are unsignalized. Highway Capacity Manual Unsignalized methodology provides output based on average seconds of delay per approaching vehicle, influenced primarily by the minor approaches. As CMP impact methodology is based on percentage impact calculations, similar to V/C output of signalized LOS methodology, unsignalized LOS methodology, unsignalized LOS and signalized V/C changes were utilized for impact calculations.

SOURCE: KOA, *Traffic Impact Study for LAUSD South Region High School #9*, July 2, 2008.

**TABLE 3H-6
DETERMINATION OF PROPOSED PROJECT IMPACTS – WEEKDAY PM PEAK PERIOD**

Intersection	Existing Conditions (Year 2007)		Future (Year 2012) Pre-Project Conditions		Future (Year 2012) Project Conditions		Diff.	Signif?
	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS		
Atlantic Avenue and Firestone Blvd.	1.039	F	1.521	F	1.530	F	0.009	No
Rayo Avenue and Firestone Blvd.	1.049	F	1.298	F	1.322	F	0.024	Yes
Atlantic Avenue and Southern Avenue	0.626	B	0.768	C	0.843	D	0.075	No
Rayo Avenue and Southern Avenue [a]	16.6 sec	C	19.4 sec 0.524	C	22.2 sec 0.529	C	0.025	No
Adella Avenue and Southern Avenue [a]	9.2 sec	A	9.3 sec 0.073	A	9.5 sec 0.096	A	0.023	No
Atlantic Avenue and Wood Avenue [a]	75.1 sec	F	>100 sec 0.712	F	>100 sec 0.727	F	0.015	No
Pinehurst Avenue and Tweedy Blvd. [a]	21.4 sec	C	26.2 sec 0.370	D	30.8 sec 0.406	D	0.036	No
Atlantic Avenue and Tweedy Blvd.	0.943	E	1.110	F	1.138	F	0.028	Yes
Atlantic Avenue and Chakemco Street [a]	13.6 sec	B	15.8 sec 0.523	C	16.2 sec 0.537	C	0.014	No
Wright Road and Atlantic Avenue	28.7 sec	D	70.9 sec 1.019	F	86.6 sec 1.041	F	0.022	Yes
Atlantic Avenue and Michigan Avenue [a]	0.492	A	0.581	A	0.586	A	0.005	No

^[a] Intersections are unsignalized. Highway Capacity Manual Unsignalized methodology provides output based on average seconds of delay per approaching vehicle, influenced primarily by the minor approaches. As CMP impact methodology is based on percentage impact calculations, similar to V/C output of signalized LOS methodology, unsignalized LOS methodology, unsignalized LOS and signalized V/C changes were utilized for impact calculations.

SOURCE: KOA, *Traffic Impact Study for LAUSD South Region High School #9*, June 6, 2008.

As shown in Table 3H-5, the proposed project would result in a significant impact during the AM peak hour at five of the eleven intersections. V/C ratios (or delay) would increase by more than the threshold that the City considers acceptable (equal to or greater than an increase of 0.020) for intersections with a V/C ratio of E or F. The five intersections with a significant impact would be:

- Atlantic Avenue at Firestone Boulevard (V/C increase of 0.026);
- Rayo Avenue at Firestone Boulevard (V/C increase of 0.030);
- Atlantic Avenue at Wood Avenue (V/C increase of 0.041); and
- Atlantic Avenue and Tweedy Boulevard (V/C increase of 0.089).

Wright Road and Atlantic Avenue (V/C increase of 0.082) As shown in Table 3H-6, the proposed project would result in a significant impact during the PM peak hour at three of the eleven intersections. V/C ratios (or delay) would increase by more than the threshold that the City

considers acceptable (equal to or greater than an increase of 0.020) for intersections with a V/C ratio of E or F. The three intersections with a significant impact would be:

- Rayo Avenue at Firestone Boulevard (V/C increase of 0.024)
- Atlantic Avenue and Tweedy Boulevard (V/C increase of 0.028)
- Wright Road and Atlantic Avenue (V/C increase of 0.022)

Neighborhood Impact Analysis

In addition to the intersections within the study area, three residential street segments were included in the traffic analysis. Similar to the intersection analysis, the existing average daily trips (ADT) at each study segment was adjusted to include ambient growth and any related project traffic estimated to occur on the residential roadway segment. Proposed project traffic was then added to each of the three study segments, which represent future with proposed project conditions. The analysis of future with proposed project and future without proposed project traffic volumes determines whether or not the proposed project would have an impact on these study segments.

The City of South Gate does not have established thresholds for roadway segment impacts, so the City of Los Angeles thresholds were used for project-related increases in the ADT on study roadway segments, was used as shown in **Table 3H-7**.

**TABLE 3H-7
PROPOSED PROJECT-RELATED AVERAGE DAILY TRAFFIC PERCENT INCREASES**

ADT with Proposed Project	Maximum Proposed Project-Related Increase in ADT
0 to 999	16%
1,000 or more	12%
2,000 or more	10%
3,000 or more	8%

SOURCE: KOA, *Traffic Impact Study for LAUSD South Region High School #9*, July 2, 2008.

Table 3H-8 provides a summary of traffic impacts to the study segment roadways that would occur during the operation of the proposed project.

As shown in Table 3H-8 the proposed project would result in significant traffic impacts to the roadway segments of Adella Avenue north of Wood Avenue and Tweedy Boulevard west of the project site boundary. ADT on these three roadway segments would increase by 49.9 percent and 301.0 percent respectively, which are above thresholds established by the City of Los Angeles. The recommended mitigation measures for these roadway impacts are discussed below.

**TABLE 3H-8
NEIGHBORHOOD STREET IMPACT ANALYSIS**

Street Segments	Time Period	Weekday Base Volumes				Proposed Project				
		Existing	Ambient Growth	Related Projects	Future Base	Project Only	Future with Project	Increase (%)	Sig. Impact Criteria	Sig. Impact
1. Adella Avenue, north of Wood Avenue	ADT	698	5.0%	0	733	366	1,099	49.9%	12%	Yes
2. Wood Avenue, west of Adella Avenue	ADT	1,265	5.0%	0	1,328	128	1,456	9.6%	12%	No
3. Tweedy Boulevard, west of project site boundary	ADT	1,407	5.0%	0	1,477	4,446	5,923	301.0%	8%	Yes

SOURCE: KOA, *Traffic Impact Study for LAUSD South Region High School #9 Project*, July 2, 2008.

Mitigation Measures

Study Intersection Mitigation Measures

TRK-1 *At the intersection of Atlantic Avenue and Firestone Boulevard, LAUSD shall coordinate with the City of South Gate to implement a northbound dedicated right turn lane. The northbound bus stop at this location shall be moved to the far side of the intersection (the southeast corner stop is a near-side stop).*

Roadway Segment Mitigation Measures

TRK-2 *LAUSD shall coordinate with the City of South Gate to develop a Neighborhood Traffic Management Plan for the roadway segments of Adella Avenue north of Wood Avenue and Tweedy Boulevard west of the project site boundary. LAUSD will contribute funds in an amount not to exceed \$25,000 toward the completion of a Neighborhood Traffic Management Plan study, including public meetings and the implementation of traffic calming measures, such as speed humps/cushions or more intense improvements, such as turn restrictions and geometric changes to enforce those restrictions.*

Study Intersections that cannot be Mitigated to Less than Significant

The following improvements would alleviate significant impacts at study intersections, however, they have been determined to be infeasible.

- *Rayo Avenue and Firestone Boulevard.* There is not adequate width within the existing right-of-way to provide additional lane capacity. Widening of any of the intersection approaches due to the existing right-of-way is therefore considered to be infeasible; therefore, there is no feasible mitigation measures at this intersection. The significant project impacts in the AM and PM peak hours at this location would remain significant and unavoidable in the post-project period.

- *Atlantic Avenue and Wood Avenue.* Potential improvement measures that could remove the significant project impact at this location include additional lanes at the westbound approach of Wood Avenue (to allow left turn and right turn movements to proceed separately), and the signalized control of the intersection. An analysis of peak hour traffic signal warrants, using post-project volumes at this location, indicated that such warrants would not be met. Additional approach lanes at the minor approach would not improve operations enough to reduce the significant impact. Therefore, the significant project impact at this location would remain significant and unavoidable in the post-project period.
- *Atlantic Avenue and Tweedy Boulevard.* The addition of one approach lane to both the eastbound and westbound approaches, which would allow for two dedicated left turn lanes at the eastbound approach and dedicated left and right turn lanes at the westbound approach, would allow for the use of protected left turn phases and overlapping through-movements for both approaches. However, the addition of the approach lanes at the eastbound and westbound approaches to this intersection would not improve intersection operations to the extent that the significant project traffic impact would be removed. There 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. Therefore, there are no feasible mitigation measures at this intersection. The project impact at this location would remain significant and unavoidable in the post-project period.
- *Wright Road and Atlantic Avenue.* Potential signalization of the Wright Road intersection would be complicated by the presence of the Chakemco Road approach and multiple driveways in the immediate vicinity. Any capacity improvements to the Wright Road intersection would involve a consolidation of both the Wright Road and Chakemco Road intersections with Atlantic Avenue. This would be configured either as a new intersection with Wright Road and Chakemco Road (and a major north-south realignment of Wright Road), with an improved intersection with Chakemco Road and Atlantic Avenue to the west. Other options include the closure of either Wright Road or Chakemco Road near the Atlantic Avenue corridor, which would allow for full-access intersection improvements to take place at the remaining intersection. All of these potential improvements are infeasible due to the lack of an existing right-of-way to create new roadways and cul-de-sacs. For these reasons, signalization of the Wright Road intersection, or the reconfiguration of the intersection, are considered infeasible. The significant project impact in the AM peak hour at this location would remain significant and unavoidable in the post-project period.

Residual Impacts

As discussed above, the implementation of a northbound dedicated right turn lane at the intersection of Atlantic Avenue and Firestone Boulevard, the intersection operation would improve to a V/C value of 1.214 (LOS F) in the AM peak hour and to 1.482 (LOS F) in the PM peak hour. These values represent improvements in operations beyond the future pre-project values. The significant project traffic impact would be removed in the AM peak hour. The project would not significantly impact this location in the PM peak hour. Thus, with mitigation, the

impact at the intersection of Atlantic Avenue and Firestone Boulevard would be less than significant.

Even so, project impacts to additional intersections in the project area (e.g., Rayo Avenue and Firestone Boulevard, Atlantic Avenue and Wood Avenue, Atlantic Avenue and Tweedy Boulevard, and Wright Road and Atlantic Avenue, would be significant and unavoidable. As such, residual impacts at these specific intersections would be significant and unavoidable in the post-project period.

Impact 3H.2: Exceed, either individually or cumulatively, a LOS standard established by the county congestion management agency for designated roads or highways.

Less Than Significant. The CMP was created statewide as a result of Proposition 111 and has been locally implemented by the MTA. The CMP for Los Angeles County requires that the traffic impact of development projects of potential regional significance be analyzed. A specific system of arterial roadways plus all freeways comprise the CMP system. Per the CMP TIA Guidelines, a traffic impact analysis is conducted where the following occur:

- Where the proposed project would add 50 or more vehicle trips during either AM or PM weekday peak hours at CMP arterial monitoring intersections, including freeway on-ramps or off-ramps; and
- Where the proposed project would add 150 or more trips, in either direction, during either the AM or PM weekday peak hours at CMP mainline freeway monitoring locations.

The nearest CMP arterials to the proposed project site are Firestone Boulevard and Alameda Street, located 0.5 mile to the north and 2.8 mile west of the proposed project site, respectively. Based on the trip generation calculations, and the local service area of the school, the proposed project would not be expected to add 50 or more new trips per hour to any CMP monitoring location on Alameda Street.

On Firestone Boulevard, the proposed project is expected to add a maximum of 65 trips to the roadway (to the east of Rayo Avenue) in the AM peak hour. This is the highest hour of trip generation for the proposed project. It was also determined from the traffic impact analysis that the project would create significant impacts at the intersections of Atlantic Avenue at Firestone Boulevard and Rayo Avenue at Firestone Boulevard. A mitigation measure was determined for the Rayo intersection impact (see Mitigation measure TRK-1 above).

CMP-defined significant impact thresholds were used for this study. There would not be any significant CMP impacts at local monitoring locations in the post-project period, with the implementation of the recommended mitigation measure at Atlantic Avenue and Firestone Boulevard intersection.

The nearest CMP mainline freeway-monitoring location to the project site would be on the I-710 Freeway, located east of the study area. Based on the trip distribution and assignment, proposed project trips would be primarily local rather than regional in nature. The proposed project would add less than 150 new trips per hour to any freeway segments near the project site. The total peak hour trip generation of the project would be lower than the threshold in either analyzed peak

period. Therefore, impact analysis at CMP freeway monitoring stations is not required. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Impact 3H.3: Result in inadequate parking capacity.

Project Parking Supply and Demand

Less Than Significant Impact. The proposed project would provide a total of 133 off-street parking spaces for use by faculty and staff, which is adequate for the approximately 125 faculty, staff and volunteers (full and part-time). **An additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.**

No student or visitor parking is proposed. Therefore, any student choosing to drive to the school would utilize on-street parking. During mid-day hours, the pick-up/drop-off area would be made available to visitor vehicles.

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.¹³ 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

¹³ KOA, *Traffic Study for Los Angeles Unified School District South Region High School # 9, July 2, 2008.*

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 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.

Adult School Parking Demand

The adult school education program would provide seats for 450 students, and based on the trip generation methodology utilized for the program, 21.0 percent of the students would drive to the campus (95 students). The 15 instructors and 15 support staff members would generate demand for an additional 30 spaces. Thus, there would be a generated parking demand of 125 spaces. As operation of the adult school would not overlap with operation of the high school facility, there would be 133 spaces available on-site. Off-street parking would be sufficient for the adult school education program and would not result in a significant impact to on-street parking.

Mitigation Measure

No mitigation measures are required.

Residual Impacts

Based on the information and discussion above, the proposed project would have a less than significant residual impact on parking supply.

3H.5 Cumulative Impacts

Impact 3H.4: Result in a cumulatively considerable impact with respect to traffic.

Significant and Unavoidable with Mitigation Incorporated. As described in Impact 3H1, cumulative traffic is part of background traffic volumes. A total of six related projects were considered along with an annual growth rate of one percent over five years to define future traffic without the proposed project. Future traffic without the proposed project was subtracted from the future traffic with the proposed project to determine the impact of the proposed project on the 11 study intersections (see Tables 3H-5 and 3H-6). With the implementation of Mitigation Measures TRK-1 and TRK-2 above, implementation of the proposed project would result in a

less than significant impact to the intersection at Atlantic Avenue and Firestone Boulevard and at the residential roadway segments. The impact would be significant and unavoidable at the intersections of Rayo Avenue at Firestone Boulevard; Atlantic Avenue at Wood Avenue; Atlantic Avenue at Tweedy Boulevard; and Wright Avenue at Atlantic Avenue.

With the implementation of a northbound dedicated right turn lane at the intersection of Atlantic Avenue and Firestone Boulevard, the intersection operation would improve to a V/C value of 1.214 (LOS F) in the AM peak hour and to 1.482 (LOS F) in the PM peak hour. These values represent improvements in operations beyond the future pre-project values. The significant project traffic impact would be removed in the AM peak hour. The project would not significantly impact this location in the PM peak hour. Thus, with mitigation, the impact at the intersection of Atlantic Avenue and Firestone Boulevard would be less than significant.

Mitigation Measures

See Mitigation Measures TRK-1 and TRK-2 above.

Residual Impacts

As stated above, the traffic-related impact to the studied impacted intersections and roadway segments would be mitigated to a less than significant impact at the intersection of Atlantic Avenue and Firestone Boulevard and at the residential roadway segments. The impact would be significant and unavoidable at the intersections of Rayo Avenue at Firestone Boulevard; Atlantic Avenue at Wood Avenue; Atlantic Avenue at Tweedy Boulevard, and Wright Avenue at Atlantic Avenue.

CHAPTER 4.0

Alternatives Analysis

4.1 Introduction and Overview

CEQA requires that an EIR describe a range of reasonable alternatives to the proposed project that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the project.¹ An EIR should also evaluate the comparative impacts of the alternatives. This chapter describes potential alternatives to the proposed project, including alternatives that were considered and those that were eliminated from further consideration, and reasons for dismissal. This chapter also has a comparison of the alternatives to the potential environmental impacts associated with the proposed project.

Key provisions of the *CEQA Guidelines* pertaining to the alternatives analysis are summarized below:²

- The discussion of alternatives shall focus on alternatives to the proposed project or to the project location that are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the proposed project objectives, or would be more costly.
- The No Project Alternative shall be evaluated along with its impact. The No Project Alternative analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the proposed project need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives has been selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site

¹ *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6 Chapter 3, §15126.6, 2007.

² *Ibid.*

suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.³ An EIR need not consider an alternative whose effects cannot be reasonably identified, whose implementation is remote or speculative, and that would not achieve the basic project objectives.

4.2 Project Objectives

As discussed in Chapter 2, Project Description, the proposed project is intended to implement the *Facilities Master Plan* to provide for a portion of the educational needs of students within LAUSD's South Region Planning Area for grades 9 through 12. The proposed project would fulfill the following major objectives:

- Eliminate involuntary busing of students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible;
- Create schools that are centers of community engagement both during and outside of normal operating hours;
- Avoid displacement of existing residences and businesses where feasible;
- Maintain traditional classroom instruction hours for high school students of approximately 8:00 AM to 3:00 PM;
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities;
- Maximize the use of District-owned land; and
- Build and maintain a school that reflects the wise and efficient use of limited land and public resources the wise and efficient use of limited land and public resources.

4.3 Alternatives to the Proposed Project

LAUSD certified an EIR in connection with its acquisition of the site in 1991.⁴ An analysis of alternative locations for SRHS No. 9 was performed in the CEQA documentation performed for site acquisition. Several alternative scenarios were identified and evaluated in the 1991 EIR, including the "no project" and several alternative locations for the proposed elementary and senior high schools. A generalized assessment of each of the alternatives is provided in the text. The LAUSD established several criteria for site selection, and identified sites which meet the minimum requirements for planned school facilities (e.g., site size, facility/space requirements, etc.). For the proposed project, the District identified five alternative sites meeting the minimum requirement for the proposed project. The 1991 EIR analysis was based upon the following: 1). minimized displacement of owner-occupied homes and apartments, 2). located in an area to relieve overcrowding at two or more schools, 3). provides adjoining streets.

³ *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6 Chapter 3, §15126.6, 2007.

⁴ Environmental Perspectives, Final Environmental Impact Report, South Gate New Senior High School No. 1 and South Gate New Elementary School No. 3; Prepared for the Los Angeles Unified School District, March 1991.

The proposed project site was preferred as it is the only option that did not result in issues related to displacement and relocation, or proximity to a chemical plant, which poses a potential for health hazards to future students, which are expressly prohibited according to AB 3205. Based on the thorough analysis of the preferred alternative and the assessments of the five alternative site location alternatives; , the preferred alternative (i.e., proposed project) is considered the “environmentally superior” alternative. This is predicated primarily on the fact that each of the alternatives would necessitate higher displacement of residential and/or industrial/commercial development.

The alternatives identified below, with the exception of the mandatory No Project Alternative, were selected due to their potential to attain the basic project objectives discussed above, and to lessen or avoid significant environmental effects resulting from implementation of the proposed project. Alternatives considered in this EIR include:

Alternative 1 – No Project Alternative

Alternative 2 – Reduced Project Alternative

The feasible alternatives below evaluate the ability of each alternative to reduce or avoid significant adverse environmental impacts, while achieving the basic project objective (i.e., relieving overcrowding at Bell, Huntington Park, South East, and South Gate High School). Individual sections in Chapter 3 and the Executive Summary have a detailed discussion of environmental impacts, by each issue area that would result from implementation of the proposed project. A summary comparison of the impacts of the alternatives and the proposed project is included in Table 4.1, at the end of this chapter.

Alternative 1 – No Project Alternative

Section 15126.6(e) of the *CEQA Guidelines* requires consideration and analysis of the No Project Alternative. The No Project Alternative must discuss the existing condition, as well as what would be reasonably expected to occur in the foreseeable future if the proposed project were not to be approved based on current plans, site zoning, or consistency with available infrastructure and community services. Under the No Project Alternative, the proposed project would not be constructed. The project site would remain vacant and underutilized. The new seats necessary to minimize overcrowding in the South Region would not be provided. LAUSD would be required to continue to accommodate the projected increases in student enrollment, and would add portable classrooms to existing schools where feasible. No change in proposed project site conditions or land uses would occur under this alternative.

Aesthetics. Under the No Project Alternative, aesthetic impacts relating to the shadows from school buildings would not occur. The proposed project site would continue in its existing form and the existing visual character of the neighborhood would not be altered. However, the site would remain occupied by unoccupied buildings and uses could be considered visually unattractive. Thus, this alternative would result in no shadow impacts, the site would contract sharply with nearby residential uses.

Air Quality. Construction air quality impacts, such as fugitive dust and construction equipment emissions, would not occur under the No Project Alternative. This alternative would not require excavation, grading, and demolition activities, and would have reduced air quality impacts from construction in comparison to the proposed project. Additionally, operational emissions (e.g. increased vehicle trips) would not occur. This alternative would have fewer impacts than the proposed project for air quality.

Hazards and Hazardous Materials. Under the No Project Alternative, the project site would remain in its existing condition. The existing soils and groundwater contamination at the site, planned for clean-up prior to proposed project operation, would remain. Even though the existing contamination would remain under the No Project Alternative, there would be no occupants subject to the risks as the site is vacant. Even so, the No Project Alternative would have a greater potential to expose the surrounding area to hazards resulting from on-site contamination. This alternative would not introduce additional traffic and pedestrian activity in the vicinity of the UP railroad track (Spur No. 810961T). The proposed project would have fewer impacts overall than the No Project Alternative regarding hazards and hazardous materials.

Noise. Under the No Project Alternative, construction noise associated with the proposed project would not occur. In addition, this alternative would not involve the introduction of new traffic to the site as a result of school operations. No new noise sources would be introduced, and the No Project Alternative would result in fewer noise impacts than the proposed project. This alternative would have fewer impacts overall than the proposed project for noise.

Pedestrian Safety. Under the No Project Alternative, there would not be an increase in the number of pedestrians on the street network surrounding the proposed project site. The potential risks to pedestrians from traffic near the proposed project site would not occur. Therefore, the No Project Alternative would have fewer impacts overall than the proposed project for pedestrian safety.

Public Services. Under the No Project Alternative, no new school would be constructed and operated on the vacant project site. There would be no effect on fire department response times or routes. Therefore, the No Project Alternative would result in no potential impacts to fire protection services, and would have reduced public services impacts in comparison to the proposed project. Thus, this alternative would have fewer impacts overall than the proposed project for fire services.

Transportation and Traffic. Under the No Project Alternative, no change to current traffic levels or circulation conditions would occur. Implementation of this alternative would not generate increased traffic to the surrounding roadway network. Therefore, the No Project Alternative would reduce transportation and traffic impacts in comparison to the proposed project. This alternative would have fewer impacts overall than the proposed project for transportation and traffic.

Conclusion and Relationship to Project Objectives

The No Project Alternative would result in the continuation of existing conditions at the proposed project site. The project site would remain vacant and unutilized. Compared to the proposed project, the No Project Alternative is environmentally superior in all areas: aesthetics, air quality, noise, pedestrian safety, public services, and transportation and traffic. This alternative would not achieve the basic project objective of relieving overcrowding at Bell, Huntington Park, South East, and South Gate High Schools. While the overall environmental impacts associated with the No Project Alternative would have fewer impacts overall than the proposed project, none of the project objectives would be achieved.

Reduced Project Alternative

Under the Reduced Project Alternative, a high school would be operated at the same location as the proposed project, but at a reduced scale. This alternative considers the following scenario:

- Provision of 1,073 two-semester seats as opposed to the 1,431 two-semester seats, which represents a 25 percent reduction in project size.

Under this alternative, a smaller high school would be built on the proposed project site. The remaining project site would be open space. The Reduced Project Alternative would provide approximately 1,073 two-semester seats compared to 1,435 two-semester seats under the proposed project, which is approximately 75 percent of the proposed 1,435 seats. The Reduced Project Alternative would include the multipurpose room, music and drama hall, gymnasium, and administration building, but at a smaller scale as compared to the proposed project. The facilities would not exceed two stories in height (approximately 34 feet). The 133-space surface parking as part of the proposed project would be reduced to 100 spaces under this alternative. This alternative would provide athletic fields for soccer and football, but would not provide a diamond field for softball and baseball activities.

Aesthetics. Aesthetic impacts associated with the proposed project would include potential shade and shadow impacts to the residents to the north and related to nighttime lighting of the athletic fields on the eastern portion of the campus. The reduced project alternative would result in similar impacts as the structures would be adjacent to the residential development to the north, and would include the proposed athletic fields. Therefore, this alternative would result in similar impacts to visual quality (aesthetics) as compared to the proposed project.

Air Quality. The Reduced Project Alternative would require excavation, grading, and demolition activities, and subsequent construction of the proposed project site. Operational emissions would still be generated by vehicle trips to and from the school, but at a lesser magnitude due to fewer vehicle trips to the smaller educational facility. This alternative would not result in any appreciable difference in the magnitude of significance of potential operational air quality impacts. Even so, air quality impacts from the Reduced Project Alternative would be less than the proposed project overall due to reduced building size and related vehicle trips.

Hazards and Hazardous Materials. The Reduced Project Alternative would require similar activities related to site cleanup to reduce potential risks to students and staff resulting from on-site contamination. As a result, the Reduced Project Alternative would have similar impacts as the proposed project in relation to hazardous waste. The number of occupants within the project site potentially subject to hazardous materials impacts would be reduced as fewer students would attend the school. Impacts related to emergency response times would be slightly reduced with this alternative compared to the proposed project as the number of site occupants would be fewer, thereby resulting in less vehicular and pedestrian traffic. This alternative would introduce less traffic and pedestrian activity in the vicinity of the UP railroad tracks (Spur No. 810961T). As such, this alternative is considered environmentally superior to the proposed project.

Noise. Noise levels during construction under the Reduced Project Alternative would be expected to be similar to the proposed project since similar activities would be involved during construction and similar activities would be conducted at the proposed project site. Operational impacts would be similar to the proposed project, but would be expected to be reduced by a small amount as a result of less traffic noise and less noise from a smaller student population. Therefore, this alternative would therefore have fewer potential impacts than the proposed project.

Pedestrian Safety. Implementation of the Reduced Project Alternative would result in the operation of a local high school bordered by streets with high volumes of traffic. Similar to the proposed project, students would walk to school along Tweedy Boulevard and Adella Avenue, and potentially crossing Atlantic Boulevard. Even though there would be fewer students, the potential hazard for students crossing surrounding streets would remain. Therefore, this alternative would have impacts to pedestrian safety that would be similar to the proposed project.

Transportation and Traffic. Under the Reduced Project Alternative, traffic impacts would be incrementally reduced compared to the proposed project because 358 fewer students would attend the school. Therefore, this alternative would generate less traffic than the project and would reduce the intensity of impacts as compared to the proposed project.

Conclusion and Relationship to Project Objectives

The Reduced Project Alternative would provide approximately 1,073 two-semester high school seats. Under this alternative, the overcrowded conditions at Bell, Huntington Park, South East, and South Gate High Schools would be alleviated but not to the extent that it would occur under the proposed project. Compared to the proposed project, the Reduced Project Alternative is environmentally superior in the following areas: air quality, hazardous and hazardous materials, noise, pedestrian safety, public services, and transportation and traffic. The Reduced Project Alternative is neither environmentally superior nor inferior to the proposed project in relation to aesthetic impacts. However, the following project objectives would not be achieved:

- Eliminate involuntary busing of capped students as soon as possible;
- Reduce reliance on portable classrooms as soon as possible; and
- Maintain or increase existing opportunities for after-school athletic and extra-curricular activities (due to removal of baseball diamond as compared to the proposed project).

4.4 Environmentally Superior Alternative

Of the alternatives analyzed in this document, the No Project Alternative is considered the environmentally superior alternative as it would avoid all of the potential environmental impacts related to the proposed project. However, the No Project Alternative would not meet the proposed project's objectives.

If the No Project Alternative is determined to be the environmentally superior alternative, another environmentally superior alternative must be identified among the remaining alternatives.⁵ As such, the Reduced Project Alternative would result in the fewest environmental impacts as compared to the proposed project in the areas of aesthetics, air quality, noise, and traffic while achieving most of the objectives of the proposed project.

⁵ *CEQA Guidelines*, California Code of Regulations (CCR), Title 14, Division 6, Chapter 3 §15126.6(e)(a)(2), 2007.

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
I. AESTHETICS - Would the project:			
Have a substantial adverse effect on a scenic vista?	No Impact	Less	Similar
Damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	Less	Similar
Substantially degrade the existing visual character or quality of the site and its surroundings?	Less than Significant	Less	Similar
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant	Less	Similar
II. AGRICULTURAL RESOURCES - In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Department of Conservation as an optional model to use in assessing impacts on agricultural farmland. Would the project:			
Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program in the California Resources Agency, to non-agricultural use?	No Impact	Similar	Similar
Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	Similar	Similar
Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland, to non-agricultural use?	No Impact	Similar	Similar
III. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or pollution control district may be relied upon to make the following determinations. Would the project:			
Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant	Less	Similar
Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Significant and Unavoidable	Less	Similar
Create or contribute to a non-stationary source "hot spot" (primarily carbon monoxide)?	Less Than Significant	Less	Similar
Expose Sensitive receptors to substantial pollutant concentrations?	Significant and Unavoidable	Less	Similar
Create objectionable odors affecting a substantial number of people?	Less Than Significant	Less	Similar
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Less Than Significant	Less	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
IV. BIOLOGICAL RESOURCES – Would the project:			
Adversely impact, either directly or indirectly or through habitat modifications, any endangered threatened or rare species as listed in Title 14 of the California Code of Regulations (Section 670.2 or 670.5) or in Title 50 of the Code of Federal Regulations (Section 17.11 or 17.12)?	Less Than Significant	Less	Similar
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	No Impact	Less	Similar
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No Impact	Less	Similar
Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	Less	Similar
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeded the use of native wildlife nursery sites?	No Impact	Less	Similar
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact	Less	Similar
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact	Less	Similar
V. CULTURAL RESOURCES – Would the project:			
Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	No Impact	Similar	Similar
Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less Than Significant	Less	Similar
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	Less	Similar
Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	Less	Similar
VI. GEOLOGY AND SOILS – Would the project:			
Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	Less Than Significant	Less	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less Than Significant	Similar	Similar
Strong seismic groundshaking?	Less Than Significant	Similar	Similar
Seismic-related ground failure, including liquefaction?	Less Than Significant	Similar	Similar
Landslides?	Less Than Significant	Similar	Similar
Would the project result in substantial soil erosion or the loss of topsoil?	Less Than Significant	Less	Similar
Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less Than Significant	Less	Similar
Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994) creating substantial risks to life or property?	Less Than Significant	Less	Similar
Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, where sewers are not available for the disposal of wastewater?	No Impact	Less	Similar
VII. HAZARDS AND HAZARDOUS MATERIALS - Would the project:			
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant	Less	Similar
Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant	Similar	Similar
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less Than Significant	Less	Similar
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	Similar	Similar
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No Impact	Similar	Similar
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant	Similar	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
Expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No Impact	Similar	Similar
Be located on a site that is (a) a current of former hazardous waste disposal site or solid waste disposal site and, if so, has the waste been removed; (b) a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 of Division 20 of the Health and Safety Code; or (c) a site that contains one or more pipelines, situated underground or above ground, which carries materials or hazardous wastes, unless the pipeline is a natural gas line which is used only to supply natural gas to that school or neighborhood?	Less Than Significant	Greater	Similar
Be located within one-fourth mile of any facilities, which might be reasonably anticipated to emit hazardous or acutely hazardous materials, substances or waste?	Less Than Significant	Similar	Similar
Be located on a site where the property line less than the following distance from the edge of respective power line easement: 100 feet of a 50-133kV line, 150 feet of a 220-230 kV line, or 350 feet of a 500-550 kV line?	Less Than Significant	Similar	Similar
Be located on a site that is within 1,500 feet of a railroad track easement?	Less Than Significant	Similar	Similar
Be located on a site that is near a reservoir, water storage tanks or high-pressure water lines?	Less Than Significant	Similar	Similar
Be located within 1,500 feet of a pipeline that may pose a safety hazard?	Less Than Significant	Similar	Similar
Be located on a site that contains, or is near, propane tanks that can pose a safety hazard?	Less Than Significant	Similar	Similar
Be located on a site that does not have a proportionate length to width ratio to accommodate the building layout, parking and play fields that can be safely supervised?	Less Than Significant	Similar	Similar
Be located on a site where the existing or proposed zoning of the surrounding properties is incompatible with schools and may pose a health or safety risk to students?	Less Than Significant	Similar	Similar
Be located on a site that is within 2,000 feet of a significant disposal of hazardous waste?	No Impact	Similar	Similar
VIII. HYDROLOGY AND WATER QUALITY – Would the project:			
Violate any water quality standards or waste discharge requirements?	Less Than Significant	Less	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Less Than Significant	Less	Similar
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in erosion or silting on- or off-site?	Less Than Significant	Less	Similar
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less Than Significant	Less	Similar
Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less Than Significant	Less	Similar
Otherwise substantially degrade water quality?	Less Than Significant	Less	Similar
Place housing within a 100-year floodplain, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	No Impact	Similar	Similar
Place within a 100-year floodplain structures, which would impede or redirect flood flows?	No Impact	Similar	Similar
Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	Less Than Significant	Less	Similar
Inundation by seiche, tsunami, or mudflow?	No Impact	Similar	Similar
IX. LAND USE AND PLANNING – Would the project:			
Physically divide an established community?	No Impact	Similar	Similar
Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant	Less	Similar
Conflict with any applicable habitat conservation plan or natural community's conservation plan?	No Impact	Similar	Similar
X. MINERAL RESOURCES – Would the project			
Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	Similar	Similar
Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No Impact	Similar	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
XI. NOISE – Would the project result in:			
Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, or a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Significant and Unavoidable	Less	Similar
Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	Less	Similar
A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant	Less	Similar
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less Than Significant	Less	Similar
XII. PEDESTRIAN SAFETY – Would the project:			
Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less Than Significant	Less	Similar
Create unsafe routes to school for students walking from local neighborhoods?	Significant and Unavoidable	Less	Similar
Be located on a site that is adjacent or near to a major arterial roadway or freeway that may pose a safety hazard?	Less Than Significant	Less	Similar
XIII. POPULATION AND HOUSING – Would the project:			
Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact	Similar	Similar
Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?	No Impact	Similar	Similar
Displace substantial numbers of businesses or jobs necessitating the construction of replacement businesses elsewhere and/or creating longer travel distances for patrons and/or employees?	No Impact	Similar	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
XIV. PUBLIC SERVICES			
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			
Fire protection?	Less Than Significant	Less	Similar
Police protection?	Less Than Significant	Less	Similar
Schools?	No Impact	Less	Similar
Other public facilities?	No Impact	Less	Similar
XV. RECREATION – Would the project:			
Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			
	No Impact	Less	Similar
Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?			
	No Impact	Less	Similar
XVI. TRANSPORTATION/TRAFFIC – Would the project:			
Cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			
	Significant and Unavoidable	Less	Similar
Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?			
	Significant and Unavoidable	Less	Similar
Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			
	Less Than Significant	Similar	Similar
Result in inadequate emergency access?			
	Less Than Significant	Similar	Similar
Result in inadequate parking capacity?			
	Less Than Significant	Similar	Similar
Conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			
	Less Than Significant	Similar	Similar
XVII. UTILITIES AND SERVICE SYSTEMS – Would the project:			
Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			
	Less Than Significant	Similar	Similar

**TABLE 4-1
COMPARISON OF ALTERNATIVES TO THE PROPOSED PROJECT (continued)**

Environmental Issue Area	Proposed Project Impact (After Mitigation)	No Project Alternative	Reduced Project Alternative
Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less Than Significant	Similar	Similar
Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Less Than Significant	Similar	Similar
Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Less Than Significant	Similar	Similar
Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	Similar	Similar
Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Less Than Significant	Similar	Similar
Comply with federal, state, and local statues and regulations related to solid waste?	Less Than Significant	Similar	Similar

CHAPTER 5.0

Other CEQA Considerations

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered the other chapters of the May 2008 Recirculated DEIR. The other CEQA considerations include environmental effects that were found not to be significant, growth-inducing impacts, and significant and unavoidable impacts.

5.1 Environmental Effects found Not Significant

The Initial Study for the proposed project, completed in April 2008, which is included in this DEIR 2008 as Appendix A, determined that the proposed project would result in either no impact or a less than significant impact to 9 of 17 environmental issue areas. The Initial Study for the proposed project discusses why the project would have no impact or less than significant impacts for these issue areas, which are subsequently not discussed in detail in this Recirculated DEIR. The issue areas determined to have no impact or a less than significant impact in the Initial Study analysis include the following:

No Impact	Less than Significant Impact
Agriculture Resources	Biological Resources
Mineral Resources	Cultural Resources
Population and Housing	Hydrology and Water Quality
Recreation and Parks	Land Use and Planning
	Utilities and Service Systems

After a more detailed evaluation of the environmental issues associated with the proposed project, the Recirculated DEIR determined that impacts would be less than significant with incorporation of project design features and mitigation measures. These issues include the following:

Less Than Significant with Mitigation Incorporated

Aesthetics (except shade/shadow)	Noise (except project related construction and operation)
Air Quality (except project related construction and operation)	Pedestrian Safety (except project related operation)
Geology and Soils (except liquefaction)	Public Services (except Fire)
Hazards/Hazardous Materials	Transportation/Traffic (except project related operation)

The EIR analysis determined that air quality, noise, traffic, and pedestrian safety would result in significant and unavoidable impacts.

5.2 Irreversible Environmental Changes

According to the *CEQA Guidelines* Section 15126(c):

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.¹ Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects of project implementation that cannot be avoided.

Both construction and operation of the proposed project would necessarily lead to the consumption of limited, slowly renewable, and non-renewable resources, committing such resources to uses that future generations would be unable to reverse. The proposed project would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the proposed project site.

Construction of the proposed project would require consumption of certain types of lumber and other forest products, the raw materials in steel, metals such as copper and lead, aggregate materials used in concrete and asphalt such as sand and stone, water, petrochemical construction materials such as plastic, petroleum based construction materials and other similar slowly renewable or nonrenewable resources. Additionally, the use of construction vehicles and equipment would require the consumption of fossil fuels. In terms of proposed project operations, the following slowly renewable and nonrenewable resources would be required: natural gas and electricity; petroleum-based fuels; fossil fuels; and water. Title 24 of the California Code of Regulations regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes.

The commitment of building materials required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the proposed project. However, continued use of such resources is necessary to address the anticipated growth and planned changes at the proposed project site and within the general vicinity.

The proposed project would result in commitment of underutilized industrial land to school uses, eliminating other options for its use. The vacant parcels located on the proposed project site would be replaced with a new high school. Along with the long-term commitment of land uses is

¹ *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, Section 15126.2(c), 2007.

an increased commitment of certain public services to the proposed land uses. This includes the provision of police, fire, and emergency medical services; water supply services; wastewater treatment services; and solid waste disposal. However, as indicated in the Initial Study (incorporated in the DEIR 2008 as Appendix A), impacts associated with these public services would be less than significant.

5.3 Growth-Inducing Impacts

According to the *CEQA Guidelines*, an EIR must address whether a project will directly or indirectly foster growth:²

[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

As discussed in this section, this analysis evaluates whether the proposed project will directly or indirectly induce economic, population, or housing growth in the surrounding environment.

Direct Growth-Inducing Impacts in the Surrounding Environment

A project would directly induce growth if it would remove barriers to population growth such as a change to a jurisdiction's General Plan and Zoning Ordinance that allowed new residential development to occur. The goal of LAUSD in constructing more schools is to provide a higher-quality learning environment for its students, by relieving existing and projected overcrowded conditions at nearby schools.

LAUSD is mandated to educate those students residing in the District. Even with year-round sessions, busing and large class sizes, it is becoming difficult to meet the space needs for both existing and projected student enrollments. The construction of the proposed project is intended to relieve the current overcrowded conditions at nearby schools and provide capacity for projected students who will live in its attendance areas. The proposed project would not induce more growth, but accommodate that which already has occurred and which will continue to occur over time.

Indirect Growth-Inducing Impacts in the Surrounding Environment

A project would indirectly induce growth if it would increase the capacity of infrastructure in an area in which the infrastructure currently met demand. Examples would be increasing the capacity of a sewer treatment plant, or a roadway beyond that needed to meet existing demand.

² *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, Section 15126.2(d), 2007.

There is currently a shortage of schools in LAUSD. As evidenced by overcrowded conditions, the current demand for schools has not been met. As stated above, the construction of new schools would not induce more growth, but would meet the current and future demand of a population which will increase regardless of the number of schools in existence.

5.4 Significant Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(b) requires a discussion of any significant impacts that cannot be reduced to less than significant levels.³ As provided in Chapter 3, mitigation measures and project design features have been recommended to reduce project impacts to levels that are less than significant. Even so, the proposed project would result in significant and unavoidable impacts in the areas of air quality, noise, pedestrian safety, and traffic and transportation. Specifically, localized construction air emissions would exceed applicable significance thresholds, noise levels from construction and operations would exceed the applicable standards, and vehicle usage related to project operations would significantly decrease service levels for certain intersections.

³ *Ibid.*

CHAPTER 6.0

Final Environmental Impact Report Introduction

This August 2009 FEIR has been prepared pursuant to the requirements of CEQA¹ and the *CEQA Guidelines*² for the South Regional High School No. 9, State Clearinghouse Number 2008041065. The August 2009 FEIR includes:

- The May 2009 Recirculated DEIR with changes in ~~strike through~~ for deletions and ***bold italics*** for additions;
- Chapter 7: Community Outreach and Public Review Process, which summarizes public outreach conducted for the Proposed Project;
- Chapter 8: Response to Comments, which includes LAUSD's responses to all written comments received by agencies, private organizations, and the public, on the May 2009 Recirculated DEIR;
- Chapter 9: Changes to the Draft Environmental Impact Report, which describes the clarifications and revisions made to the May 2009 Recirculated DEIR; and
- Chapter 10: Mitigation Monitoring and Reporting Program, which lists all the mitigation measures required for implementation of the Proposed Project, the phase in which the measures would be implemented, and the enforcement agency responsible for compliance.

6.1 Environmental Review Process

In accordance with the requirements of CEQA and the *CEQA Guidelines*, LAUSD determined that an EIR should be prepared to analyze the potential impacts associated with the proposed project.

The EIR was prepared following input from the public, responsible agencies, affected agencies, and other interested parties through the CEQA scoping process, which included the following activities:

- An Initial Study and NOP were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 30 days (April 11 to May 12, 2008).

¹ CEQA, PRC, §21000 et al., 2005.

² *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §15000 et al., 2004.

- The NOP was posted in the County Clerk’s office for 30 days from April 11, 2008 to May 12, 2008 and was submitted to the State Clearinghouse on April 11, 2008 (SCH No. 2008041065) to officially solicit participation in determining the scope of the December 2008 DEIR and Recirculated DEIR.
- A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the EIR. A summary of the comments received during the scoping meeting is provided in Appendix A.
- Information requested and input provided during the 30-day public review period for the Initial Study and NOP is incorporated in this EIR (See Appendix A).
- A Draft EIR (referred to as December 2008 DEIR) and NOA were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (December 5, 2008 to January 19, 2009).
- The NOA was posted in the County Clerk’s office for 45 days from December 5, 2008 to January 19, 2009 and was submitted to the State Clearinghouse on December 5, 2008 to officially solicit participation in the findings of the December 2008 DEIR.
- A public meeting was held on December 6, 2008 at Bryson Elementary School to gather input from the local community regarding the findings of the December 2008 DEIR. A summary of the comments received during the scoping meeting is provided in Appendix A.
- A Revised DEIR (also referred to as May 2009 Recirculated DEIR) were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (May 28 to July 13, 2009).

As provided in *CEQA Guidelines* Section 15088.5(a), the lead agency is authorized to include additional information in a FEIR, including project modifications, changes in the environmental setting, additional data or other information. The modifications outlined above result from agency and public input, are minor in nature, and do not result in a new, substantial environmental impact or substantially increase the severity of an environmental impact already studied in the December 2008 DEIR and May 2009 Recirculated DEIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in *CEQA Guidelines* Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

1. When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;
2. When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificance);

3. When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or
4. When the Draft EIR was so fundamentally inadequate and conclusory that meaningful public review and comment were precluded.

The modifications throughout this August 2009 FEIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this FEIR.

CHAPTER 7.0

Community Outreach and Public Review Process

Notices informing the community of the public review periods and public meetings for the NOP/Initial Study and December 2008 DEIR were distributed using three methods: a NOP and NOA, an informational flier, and newspaper publication. Notices informing the community of the public review periods and public meetings for the May 2009 Revised DEIR were distributed using a NOA, an informational flier, and newspaper publication. The NOP and NOA were printed in English and Spanish and included information on where to view the NOP and DEIR, how to comment on the NOP and DEIR, and information on the public meetings.

The NOP/Initial Study were distributed to responsible agencies, affected agencies, and other interested parties, for a period of 30 days (April 11 to May 12, 2008). The NOP was posted in the County Clerk's office for 30 days from April 11, 2008 to May 12, 2008 and was submitted to the State Clearinghouse on April 11, 2008 (SCH No. 2008041065) to officially solicit participation in determining the scope of the EIR. A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the EIR. A summary of the comments received during the scoping meeting is provided in Appendix A.

The December 2008 DEIR and NOA were distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (December 5, 2008 to January 19, 2009). The NOA was posted in the County Clerk's office for 45 days from December 5, 2008 to January 19, 2009 and was submitted to the State Clearinghouse on December 5, 2008 to solicit participation in the findings of the DEIR. A public meeting was held on December 6, 2008 at Bryson Elementary School to gather input from the local community regarding the findings of the DEIR. A summary of the comments received during the scoping meeting is provided in Appendix A.

The May 2009 Revised DEIR was recirculated by LAUSD for a 45-day review period, beginning May 28, 2009, to analyze potential environmental impacts resulting from constructing and operating new playfields proposed for development to the south of the main campus. This new site component was not considered in the December 2008 DEIR. The new playfields proposed are not considered "significant new information" as defined in CEQA Guidelines Section 15088.5. Even so, LAUSD decided to recirculate the December 2008 DEIR to include associated CEQA analysis of potential environmental impacts from constructing and operating the south campus playfields for public consideration, in the Recirculated DEIR. LAUSD, as the Lead Agency, is responsible for approving the proposed project.

7.1 Notice of Preparation and Initial Study

Per *CEQA Guidelines* Section 15082, a NOP/Initial Study was prepared. The public outreach for the NOP/Initial Study included distribution of the NOP using the following methods:

Newspaper Publications

- Published legal announcement of the NOP in the *Long Beach Press– Telegram*
- Published legal announcement of the NOP in *Hoy*

An NOP was printed in English and Spanish and included details on the public review period and the time and location of the public meeting. Distribution of the flier included the following:

NOP Sent By U.S. Postal Mail:

- Previous meeting attendees, 403 fliers

Notice Sent Home with Students at the Following Schools:

- Bryson Ave. School, 850 fliers
- Madison Elementary School, 700 fliers
- San Miguel School, 700 fliers
- Victoria Ave. School, 850 fliers
- International School, 680 fliers
- South Gate Middle School, 3000 fliers
- Southeast Middle School, 1300 fliers
- Southeast High School, 2300 fliers

Notice Walked Door– to– Door within a ½– Mile Radius of the Following Locations:

- ½ mile radius to the proposed site, 2500 fliers
- 2 blocks around the proposed site, 150 fliers

Notice Delivered at Key Community Places:

- South Gate City Hall, 300 fliers
- South Gate Police Department, 300 fliers
- South Gate Senior Center, 200 fliers
- South Gate Recreation Center/South Gate Park, 300 fliers
- Padres Unidos Group, 100 fliers
- South Gate Chamber, 200 fliers
- South Gate Library, 300 fliers
- South Gate Girls Clubhouse, 200 fliers
- Rotary Club of South Gate, 100 fliers
- South Gate Sports Center, 200 fliers
- Oldtimer’s foundation, 200 fliers
- St. Helen’s Church, 300 fliers

Notice Delivered Via E- mail:

- Vickie Ramos, BM Yolie Flores Aguilar
- Ronald Palacios, BM Yolie Flores Aguilar
- Edgar Cisneros, Field Deputy – Supervisor Gloria Molina
- Daisy Pizana, Field Deputy – Congresswoman Linda Sanchez
- LAUSD Bond Oversight Committee
- Betty Forestor, UTLA
- Martin Galindo, LD6 Superintendent
- Ana Rodriguez, Administrative Asst. – LD6 Superintendent
- Ulisses Sanchez – Senator Ron Calderon’s Office
- Maricela Cervantez – Southeast Coalition
- Nellie Cobos – City of South Gate
- Enrique Vega – Assembly Member Hector De La Torre
- Luis Marquez – Senator Allan Lowenthal’s office
- Mahmoud Anjomshoaa – City of South Gate
- Bob Dickey – City of South Gate
- Steve Lefever – City of South Gate
- Gil Hurtado – South Gate Vice Mayor
- Maria Davila – South Gate Councilmember

Fax notification sent to the following:

- Local Superintendent 6 – Martin Galindo
- Board Member – Yolie Flores– Aguilar
- City of South Gate Council members: Gregory Martinez, Henry Gonzales, Maria Davila
- City of South Gate Mayor Office: Bill De Witt , Mayor; Gil Hurtado, Vice Mayor
- LA County Supervisor Gloria Molina
- State Assemblyman – Hector De La Torre
- Senator Alan Lowenthal
- U.S Congresswoman Linda Sanchez

Other Means of Promoting Scoping Meetings

- Advertised on LAUSD’s New Facilities website

7.2 Notice of Availability for December 2008 Draft Environmental Impact Report

In accordance with *CEQA Guidelines* Section 15087(a), a NOA of the December 2008 DEIR prepared. Public outreach for the December 2008 DEIR included distribution of the NOA using the following methods:

Newspaper Publications:

- Published legal announcement in the *Long Beach Press– Telegram*

- Published legal announcement in *Hoy*

An informational flier was printed in English and Spanish and included details on the public review period and the time and location of the public meeting. Distribution of the flier included the following:

Notices Sent By U.S. Postal Mail:

- Previous meeting attendees, 46 fliers

Notice Sent Home with Students at the Following Schools:

- Bryson Elementary School, 1500 fliers
- Bell High School, 3000 fliers
- South East High School, 2400 fliers
- International School, 1500 fliers
- South Gate High School, 3000 fliers

Notice Walked Door– to– Door within a ½– Mile Radius of the Following Locations:

- Tweedy Blvd and Adella Ave, South Gate, 2500 fliers

Notice Delivered at Key Community Places:

- South Gate City Hall, 300 fliers
- South Gate Police Department, 300 fliers
- South Gate Senior Center, 200 fliers
- South Gate Recreation Center/South Gate Park, 300 fliers
- Padres Unidos Group, 100 fliers
- South Gate Chamber, 200 fliers
- South Gate Library, 300 fliers
- South Gate Girls Clubhouse, 200 fliers
- Rotary Club of South Gate, 100 fliers
- South Gate Sports Center, 200 fliers
- Oldtimer’s foundation, 200 fliers
- St. Helen’s Church, 300 fliers
- St. Margaret’s Church, 300 fliers
- United Methodist Church of South Gate, 300 fliers
- South Gate First Christian Church, 300 fliers

Notice Delivered Via E– mail:

- Vickie Ramos, BM Yolie Flores Aguilar
- Ronald Palacios, BM Yolie Flores Aguilar
- Edgar Cisneros, Field Deputy – Supervisor Gloria Molina
- Daisy Pizana, Field Deputy – Congresswoman Linda Sanchez
- LAUSD Bond Oversight Committee
- Betty Forestor, UTLA

- Martin Galindo, LD6 Superintendent
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- Ulisses Sanchez – Senator Ron Calderon’s Office
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- Nellie Cobos – City of South Gate
- Enrique Vega – Assembly Member Hector De La Torre
- Luis Marquez – Senator Allan Lowenthal’s office
- Mahmoud Anjomshoaa – City of South Gate
- Bob Dickey – City of South Gate
- Steve Lefever – City of South Gate
- Gil Hurtado – South Gate Vice Mayor
- Maria Davila – South Gate Councilmember

Fax notification sent to the following:

- Local Superintendent 6– Martin Galindo
- Board Member – Yolie Flores– Aguilar
- City of South Gate Council members: Gregory Martinez, Henry Gonzales, Maria Davila
- City of South Gate Mayor Office: Bill De Witt , Mayor; Gil Hurtado, Vice Mayor
- LA County Supervisor Gloria Molina
- State Assemblyman – Hector De La Torre
- Senator Alan Lowenthal
- U.S Congresswoman Linda Sanchez

Other Means of Promoting NOA and December 2008 DEIR

- Advertised on LAUSD’s New Facilities website

Availability of NOA and December 2008 DEIR

During the public review period, the NOA and December 2008 DEIR were made available for review at the following locations:

- LAUSD, Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Local District 6 Office, 5800 South Eastern Avenue, Commerce;
- Bell High School, 4328 Bell Avenue, Bell;
- Huntington Park High School, 6020 Miles Avenue, Huntington Park;
- South East High School No. 2, 2720 Tweedy Boulevard, South Gate;
- South Gate High School, 3351 Firestone Boulevard, South Gate; and
- City of South Gate Public Library, 4035 Tweedy Boulevard, South Gate.

7.3 Notice of Availability for May 2009 Recirculated Draft Environmental Impact Report

In accordance with *CEQA Guidelines* Section 15087(a), a NOA of the May 2009 Revised DEIR was prepared. Public outreach for the DEIR included distribution of the NOA using the following methods:

Newspaper Publications:

- Published legal announcement in the *Long Beach Press–Telegram*
- Published legal announcement in *Hoy*

An informational flier was printed in English and Spanish and included details on the public review period and the time and location of the public meeting. Distribution of the flier included the following:

Notices Sent By U.S. Postal Mail:

- Residents and business owners within a 1,000 foot radius of the project site.

Availability of NOA and May 2009 Recirculated DEIR

During the public review period, the NOA and May 2009 Recirculated DEIR were made available for review at the following locations:

- LAUSD, Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles

7.4 Notice of Hearing and Availability of Final Environmental Impact Report

CEQA Guidelines Section 15089(b) states the lead agency may provide an opportunity for members of the public to review the FEIR before the project is approved, but the agency is not required to do so. Upon completion and revision of this August 2009 FEIR, the FEIR and supporting documents were made available for public review prior to the certification hearing as follows:

- LAUSD, Office of Environmental Health and Safety, 1055 West 7th Street, 9th Floor, Los Angeles;
- LAUSD Local District 6 Office, 5800 South Eastern Avenue, Commerce;
- Bell High School, 4328 Bell Avenue, Bell;
- Huntington Park High School, 6020 Miles Avenue, Huntington Park;
- South East High School No. 2, 2720 Tweedy Boulevard, South Gate;
- South Gate High School, 3351 Firestone Boulevard, South Gate; and
- City of South Gate Public Library, 4035 Tweedy Boulevard, South Gate.

CHAPTER 8.0

RESPONSE TO COMMENTS

8.1 INTRODUCTION

This section includes verbal and written comments received on the May 2009 Recirculated DEIR and LAUSD's responses to each comment. Comment letters are assigned a letter designation and individual comments contained within are assigned numbers for reference purposes. In the event a comment resulted in revision to the May 2009 Recirculated DEIR, changes are shown below and indented. Textual changes are also provided in Chapter 9.0 (Changes to the Draft EIR). The changes to the May 2009 Recirculated DEIR neither result in a new, substantial environmental impact nor substantially increase the severity of an environmental impact already studied. **Table 8-1** provides a list of agencies and persons that submitted comments on the May 2009 Recirculated DEIR during the public review period.

**TABLE 8-1
LIST OF AGENCIES AND PERSON SUBMITTING COMMENTS**

Letter Reference	Commenting Person/Agency	Date of Comment
A	Jeremy Wan, P.E., Los Angeles County Department of Public Works	June 4, 2009
B	Elmer Alvarez, California Department of Transportation	June 8, 2009
C	Gordon Mize, South Coast Air Quality Management District Scott	July 9, 2009
D	Celeste Shahl Brady, Stradling Yocca Carlson & Rauth	July 10, 2009
D	Celeste Shahl Brady, Stradling Yocca Carlson & Rauth on behalf of Scott Ma, Hartzog & Crabill, Inc.	July 10, 2009
E	Scott Ma, Hartzog & Crabill, Inc.	July 8, 2008

8.2 COMMENTS AND RESPONSES

The following information contains the comment letters received with each comment annotated, followed by LAUSD's response to each comment.

Comment Submittal A

From: Wan, Jeremy
Sent: Thursday, June 04, 2009 5:06 PM
To: Yanez, Jarrett
Cc: Duong, Toan; Ali, Muhammad; Montgomery, Michael; Wan, Jeremy
Subject: RE: South Region High School No. 9- LAUSD- RDEIR- Due to LDD: 06/10/09

Jarrett,

We have reviewed the subject Recirculated Draft EIR for the proposed South Region High School No. 9 and have the following comment:

All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – South Gate Quadrangle. Site-specific geotechnical reports addressing the proposed development and recommending mitigation measures for geotechnical hazards should be included as part of the EIR.

A-1

Please contact me if you have any questions.

Regards,

Jeremy Wan, P.E.

Geotechnical and Materials Engineering Division

Ext. 3873

RESPONSE TO SUBMITTAL A - DEPARTMENT OF PUBLIC WORKS

JUNE 4, 2009

Response to Comment A-1:

The May 2009 Recirculated DEIR, Subchapter 3C (Geology and Soils) p. 3C-2, acknowledges that the site is located within a liquefaction zone (refer to the Geotechnical Study provided as Appendix D to this August 2009 FEIR). To address the potential risks associated with liquefaction, project design features would be included, requiring the buildings to be supported by piles to assure down-drag due to seismic settlement or liquefaction. The piles would be designed to provide adequate resistance to seismic events or settlement of soils. As a result, impacts would remain less than significant. No revisions to the May 2009 Recirculated DEIR are required.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3747
FAX (213) 897-1337



*Flex your power!
Be energy efficient!*

June 8, 2009

Gwenn Godek -- Los Angeles Unified School District
- Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor, Los Angeles, CA 90071

Re: South Region High School No. 9 SCH No. 2008041065
Draft Environmental Impact Report
Vic. LOS / 710 / 18.44 IGR/CEQA No. 090532/EK

Dear Gwenn Godek:

We have received the edition dated May 2008, of the Draft Environmental Impact Report for the project indicated at above right. As well as daytime high-school classes, some evening adult education could be offered. The site is in South Gate across the Los Angeles River channel from the Long Beach freeway State Route I-710 and nearly equidistant from its interchanges with Imperial Highway and Firestone Boulevard. For the California State Department of Transportation (Caltrans), we have the following comments.

As an interpolated location for schooling, the project could have some effects of reducing traffic and its attendant congestion. Increase of freeway trips would be less than a 150 per hour criterion of the last CMP made for Los Angeles County (pages 3H24-25), so freeway traffic impacts are stated to be not significant. In our letter dated December 22, 2008, we noted frequent severe congestion on the State freeway I-710. So, cumulative impacts to I-710 from projects adding less traffic than the CMP criterion might be significant. Such additional traffic could at least prolong times of congestion when traffic would intermittently stop. We appreciate that mitigation contributions from individual projects might separately have rather marginal value. We ask, however, that together with other agencies, your agency support eventual establishment of some regular region-wide assessments for mitigation of cumulative impacts from smaller size projects.

B-1

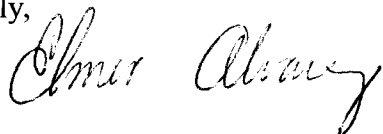
We remain concerned about potential traffic impacts from occasionally large numbers of vehicles traveling to the site for evening cultural or athletic events. Please plan to consider additional traffic control for such events. One concern might be off-ramp vehicle queues backup from intersections into freeway through-traffic lanes, a safety issue.

B-2

Gwenn Godek
June 8, 2009
Page 2 of 2

If you have any questions regarding our comments, refer to our internal IGR/CEQA Record Number 090532/EK. Then please do not hesitate to contact our review coordinator Edwin Kampmann at (213) 897-1346 or to contact me at (213) 897-6696.

Sincerely,

A handwritten signature in cursive script that reads "Elmer Alvarez". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Elmer Alvarez
IGR/CEQA Program Manager

cc: Scott Morgan, State Clearinghouse

**RESPONSE TO SUBMITTAL B –CALIFORNIA DEPARTMENT OF
TRANSPORTATION**

JUNE 8, 2009

Response to Comment B-1:

Comment noted. No additional response required.

Response to Comment B-2:

LAUSD responded to a similar comment submitted by California Department of Transportation (Caltrans) on December 22, 2008, in the March 2009 Final EIR (refer to Response to Comment A-2). As previously provided, special events on the SRHS No. 9 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. Major sporting events, with visitors traveling to and from the site on regional routes, would not occur with the proposed project, as a sports stadium is not part of the proposed project. Therefore, impacts on roadways along regional routes would not be significant, as major competitive sporting events will not take place at the school facility. The playing fields are oriented toward smaller events and major regional traffic generation would not occur. The large majority of the trip generation from such facilities would generate trips on local roadways within the neighborhoods to be served by the school. In conclusion, LAUSD considered potential traffic impacts from occasional trips resulting from periodic evening events. Potential impacts from off-ramp vehicle queues and related backup from intersections into freeway through-traffic lanes do not result in a significant safety or traffic impact.



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: JULY 9, 2009

July 9, 2009

Ms. Gwenn Godek, Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017

**Recirculated Draft Environmental Impact Report (Draft EIR) for the Proposed
South Region High School No. 9 (SCH No. 2008041065)**

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

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC090528-02
Control Number

Hazards and Hazardous Materials

1. In the Hazards/Hazardous Materials section on pages 3D-2 and 3D-8, the lead agency has determined that the potential soil excavation at the site will include soil that would be classified as a hazardous waste due to the presence of chemicals including petroleum hydrocarbons in the soil. The lead agency is reminded that, if soil is contaminated by hydrocarbon contaminants, contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, which, depending on the extent of the soil contamination, may require a VOC soil mitigation plan. Compliance with SCAQMD Rule 1166 should be referenced in the Final EIR.

C-1

Health Risk Assessment (HRA)

2. The emissions spreadsheet for Domar Precision, Inc., states that the emission rate (6.3 mg/hr) was developed from source test data. There are emissions rate calculations under the heading “Source Test Results;” however, SCAQMD staff was unable to reproduce the 6.3 mg/hr emission rate used in the analysis using these calculations. Therefore, it is unclear how the emission rate was developed. In addition, no reference or other information is provided for the source test, so SCAQMD staff could not confirm the source test result(s). The Final HRA should include a reference for the source test(s) and detail how the emissions rate used to estimate emissions from Domar Precision was developed from the source test(s).
3. SCAQMD staff has identified two issues associated with the I-710 analysis portion of the HRA. First, there is no documentation regarding how the truck trip rate was derived. Second, the emission rate from the I-710 freeway was calculated incorrectly.. According to the HRA, the link length used in the analysis is 107 meters, which is the distance between two adjacent volume sources. The emission rate between the adjacent volume sources (0.00457 gram per second) was then divided by 12, the total number of volume sources, resulting in an emission rate per volume source of 0.000381 gram per second.

C-2

C-3

There are two approaches that can be used to derive appropriate emission rates. The first approach is to calculate an emission rate for the entire link length of 1,177 meters, which is the distance between the first volume source and the 12th volume source. The resulting emission rate for the entire link length is 0.05 gram per meter (0.00457 gram per meter per link x 11 links). Alternatively, an emission rate per volume source can be used. The volume source emission rate would be 0.00419 gram per meter per volume source (0.05 gram per meter divided by 12 volume sources).

SCAQMD staff requests that the lead agency rerun the HRA, incorporating the correct emission rates identified above and include the revised result in the Final EIR. If the revised analysis shows cancer risks exceeding 10 in one million (10×10^{-6}), feasible mitigation measures should be identified as required by CEQA. If no mitigation measures are identified or the identified mitigation measures do not reduce

C-4

impacts to less than significant, the significance determination must be revised. Finally, SCAQMD staff requests the HRA tables “Quantification of Carcinogenic Risks and Noncarcinogenic Hazards Administrative Staff Scenario” and “Quantification of Carcinogenic Risks and Noncarcinogenic Hazards Student Exposure Scenario” be incorporated into the Final EIR.



C-4
cont.

RESPONSE TO SUBMITTAL C – SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

JULY 9, 1009

Response to Comment C-1:

LAUSD will comply with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) when remediating soils that may be contaminated by hydrocarbon contaminants. The Hazards and Hazardous Materials, section has been revised to indicate such.

The May 2009 Recirculated DEIR, p. 3D-3 has been revised as follows:

In addition, LAUSD would comply with SCAQMD Rule 1166 (VOC Emissions from Decontamination of Soil), including, but not limited to, development of a VOC soil mitigation plan.

The revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this August 2009 FEIR.

Response to Comment C-2:

Emission Rate Calculations (see Appendix C of the revised HRA) includes a reference for the source test and a detailed discussion of how the emissions rate used to estimate emissions from Domar Precision was developed (see Appendix E of this August 2009 FEIR). Potential health risks remain less than significant and additional mitigation measures are not required.

Response to Comment C-3:

The truck trip rate was obtained from the Caltrans standard data set. Emission rate/volume sources have been updated throughout the revised HRA (see Appendix E of this August 2009 FEIR). Potential health risks remain less than significant and additional mitigation measures are not required.

Response to Comment C-4:

All requested edits have been incorporated into the revised HRA (see Appendix E of this August 2009 FEIR). Potential health risks remain less than significant and additional mitigation measures are not required.

Comment Submittal D

STRADLING YOCCA CARLSON & RAUTH

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

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EMAIL: CSBRADY@SYCR.COM

July 10, 2009

Via Federal Express

Ms. Gwenn Godek
Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, California 90017

Re: *City of South Gate and Community Development Commission of the City of South Gate's Comments to LAUSD's Recirculated Draft Environmental Impact Report for South Region High School No. 9*

Dear Ms. Godek:

On January 16, 2009, the City of South Gate and the Community Development Commission of the City of South Gate (together, "City") submitted comments ("Comment Letter") to the Draft Environmental Impact Report ("DEIR") for Proposed Los Angeles Unified School District ("LAUSD") South Region High School #9 ("SRHS #9"). Because many of the issues identified in the Comment Letter remain unaddressed in the May¹ 2009 Recirculated Draft Environmental Impact Report ("REIR"), the City's Comment Letter is attached hereto as Exhibit "A" and fully incorporated by this reference. The REIR and the City's Comment Letter were prepared pursuant to the California Environmental Quality Act, Public Resources Code Section 21000, *et seq.* ("CEQA") and the CEQA Guidelines, California Code of Regulations, Title 14, Section 15000, *et seq.* ("Guidelines"); together these statutes and regulations are referred to as "CEQA".

While City and LAUSD representatives will continue good faith discussions regarding environmental impacts and mitigation measures for SRHS #9, in order to protect the City's rights under CEQA relating to the proposed REIR, this "Recirculated Comment Letter" provides additional written comments to the REIR. This letter, along with all exhibits hereto, shall be included in LAUSD's administrative record of proceedings to be submitted to the Board of Education when the REIR is presented for consideration and action regarding its certification. The City asserts that

¹ See *infra* discussion re "Procedural Defects" concerning the actual date of the REIR; LAUSD simultaneously distributed versions dated May 2009 and June 2009 on the cover page. The May version was provided to City staff while the June version was posted on LAUSD's website.

Ms. Gwenn Godek
Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
July 10, 2009
Page 2

certification of the REIR and approval of SRHS #9 will violate CEQA. In addition to this Recirculated Comment Letter, the City reserves all rights to provide additional comments prior to the conclusion of the public hearing, if any, and the Board's consideration, action, and certification of the final REIR for SRHS #9.

**CITY OF SOUTH GATE AND
COMMUNITY DEVELOPMENT COMMISSION OF THE CITY OF SOUTH GATE
COMMENTS TO RECIRCULATED DRAFT EIR FOR LAUSD SOUTH REGION HIGH SCHOOL NO. 9**

The REIR Fails as an Informational Document.

1. The REIR fails as an informational document and violates CEQA because the project described in the REIR is materially different than the project LAUSD studied and scoped pursuant to CEQA requirements. An accurate, stable and finite project description is the indispensable prerequisite to an informative and legally sufficient EIR. *County of Inyo v. City of Los Angeles* 71 Cal.App.3d 185, 199 (1977); *Santiago County Water District v. County of Orange* 118 Cal.App.3d 818, 829 (1981). Here, LAUSD has used inconsistent and internally conflicting project descriptions in its several iterations of the EIR as well as the studies cited in the current REIR.

LAUSD commenced CEQA review of SRHS #9 by preparing a Notice of Preparation and Initial Study dated April 2008 ("NOP/IS"). Pursuant to Section 15082 of the Guidelines, LAUSD circulated the NOP/IS to the City, among others, on or about January 30, 2008 and held a coordination meeting with the City on March 10, 2008. Throughout 2008, and as depicted in the NOP/IS, the scope of the SRHS #9 project was described as **16.4 acres** in size and depicted on the maps contained in the NOP/IS as generally bounded by residential properties along Wood Avenue to the north, Tweedy Boulevard to the south, the Los Angeles River to the east and industrial property along Atlantic Avenue to the west ("Original Project"). (NOP/IS Figures 2.3, 2.4.)

LAUSD conducted all of the initial study work and scoping meetings and consultations required by CEQA based on the Original Project description. In May² 2009, LAUSD circulated the REIR that describes a site "encompass[ing] approximately **34 acres**" and expanded to the south to the rear lot line of the residential properties on Aldrich Road ("Expanded Project"). (REIR, p. 2-2; Figures 2.1, 2.3, 2.4, 2.5, 2.6.) LAUSD asserts that the new southern portion of the Expanded Project from Tweedy Boulevard to the southern boundary of the Expanded Project site ("Expanded Area") will be used for athletic fields (turf and hardcourt with no other description/information re these additional fields). (REIR, p. ES-3.) However, the Expanded Area was never studied by LAUSD as required by Section 15082(a) of the Guidelines. LAUSD further never conducted any scoping

² See footnote 1.

Ms. Gwenn Godek
Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
July 10, 2009
Page 3

meetings regarding the Expanded Area in compliance with Section 15082(c) of the Guidelines. While changes to a project to mitigate potential environmental impacts do not require new scoping, dramatic expansion of the scope of the project, such as doubling its size/acreage, most certainly does. LAUSD's failure to conduct any form of study, or solicit any participation in scoping, regarding more than half the area of the Expanded Project violates CEQA.

LAUSD's failure to study the impacts of the Expanded Project is particularly troubling in light of LAUSD's well-documented plans to construct a middle school on the Expanded Area. (Exhs. B, C, D, F, G; KOA Traffic Study for Los Angeles Unified School District South Region High School No. 9, South Gate, California, July 14, 2008 (the "Traffic Study").) At the time LAUSD commenced scoping the Original Project, the City urged (in meetings and written correspondence) that LAUSD study the *entire* project, including the middle school, and that LAUSD not piecemeal its CEQA analysis. (Exhs. D, E, G.) LAUSD refused, stating the middle school was "unfunded and [will] not be analyzed as part of the proposed project." (Exhs. B, C, F, HH; see also Exh. D.) Now, LAUSD is seeking to piecemeal its environmental analysis of the Expanded Area by approving playfields on the site of the planned middle school. To the extent LAUSD seeks by this tactic to circumvent full CEQA review of the planned middle school, such efforts will not be countenanced.

D-1
cont.

LAUSD has compounded its violation of CEQA's mandates requiring an accurate, stable and finite project description, by expressly limiting the scope of its environmental review of the Expanded Project. As stated throughout the REIR, it:

"focuses only on those environmental impact categories identified by LAUSD as having 'potentially significant' impacts during the notice of preparation (NOP), scoping process, and public review period for the Initial Study. Other environmental concerns were found to have no impact or a less than significant impact and therefore, not [*sic*] discussed in this document."

(REIR, p. ES-3, citation omitted.)

and

"The environmental impact analysis presented [in the REIR] is based on the determinations made in the Initial Study for issues that were potentially significant."

(REIR, pp. 3A-4, 3B-23, 3C-5, 3E-12, 3F-7, 3G-4, 3H-9.)

Because the Expanded Area was never considered, studied or scoped in the NOP/IS process, LAUSD could not and did not determine whether any "potentially significant" issues exist in the Expanded Area. Indeed, LAUSD's failure to study the environmental impacts of the

Expanded Project is evident throughout the REIR and the appendices on which it relies, including but not limited to:

- The Traffic Study, which is Appendix A to the DEIR and cited throughout the REIR, studied only impacts from the Original Project. (See, e.g. Traffic Study Figure 1, p. 3; Figure 2A, p. 4; Figure 2B, p. 5; Figure 4, p. 12; Figure 5, p. 14; Figures 6-7, pp. 16-17; Figures 8-9, pp. 19-20; Figures 11-14, pp. 24-27; Figures 15-20, pp. 31-36; Figures 21-22, pp. 38-39; Figures 23, 24A, 24B, pp. 51-53; Figure 25, p. 61.)
- The Air Quality Model Outputs, Appendix A to the REIR, studied only impacts from the Original Project. (See, e.g. REIR, Appendix A pp. 50-54.)³

Accordingly, the REIR expressly does not consider or address *any* environmental issues pertaining to the Expanded Area. The REIR fails as an informational document as a matter of law.

2. Throughout the REIR, LAUSD asserts that the “scope of the traffic impact and pedestrian safety analyses were defined in a Memorandum of Understanding (“MOU”) between LAUSD and the City of South Gate.” (REIR, pp. 3F-4, 3F-5, 3H-1, 3H-10.) However, the alleged MOU has two fatal flaws: (i) it was based on the Original Project site, not the Expanded Area that is the subject of the REIR, and (ii) it was never signed by the City. (Exh. F.) Indeed, as detailed in the series of correspondence between the City and LAUSD’s traffic consultant attached hereto as Exhibits E-G and CC and incorporated herein by this reference, LAUSD consistently ignored and failed to consider the issues and concerns raised by the City with regard to the scope of LAUSD’s Traffic Study. Indeed, the Traffic Study blatantly misrepresents the communications between LAUSD, KOA and the City regarding the scope of the traffic and pedestrian safety study. (Traffic Study, p. 6.) The Traffic Study asserts that after KOA sent the April 23, 2008 draft scoping agreement to the City, “[n]o other study area modification or addition requests were made by the City.” (*Id.*) This is patently false. The City sent a letter to LAUSD on May 19, 2008 objecting to the April 23, 2008 draft memorandum (the alleged MOU or agreement that was never signed by the City) and reiterated the City’s position regarding the necessary scope of traffic and pedestrian safety analyses for the Original Project. (Exh. G.) LAUSD’s own consultants acknowledged that the City’s signature was necessary “to complete the scoping process and move forward.” (Exh. GG.) The REIR’s assertions that a MOU was executed by the City and LAUSD with regard to the

³ The City notes that the REIR contains (and LAUSD’s website includes) only two appendices; to the extent the REIR relies on any appendices prepared for the DEIR or the FEIR and such appendices fail to accurately describe the Expanded Project, the REIR further fails to comply with CEQA on this basis as well.

D-1
cont.

D-2

Expanded Project is misleading and inaccurate, causing the REIR to fail as an informational document.

↑ D-2
cont.

3. The REIR fails to accurately describe and study the environmental effects of the athletic fields located at the northeastern corner of the Expanded Site. In the “Project Description and Environmental Setting” section of the REIR, these fields are described as “playfields” with “nighttime security lighting and nighttime lighting.” (REIR, pp. 2-3.) However, in the Noise section of the REIR, the fields take on a new and expanded role as “**football and baseball stadiums.**” (REIR, pp. 3E-14, 3E-15.) Although the REIR asserts that noise in these lighted “football and baseball stadiums” will be “limited to school hours,” this claim begs the question: if the stadiums will only be used during school hours, **why will they be lighted?** The REIR fails to clearly identify that these will be lighted stadiums suitable for use for evening and weekend events such as Friday night football games. The REIR completely fails to study the environmental effects on noise, air quality, parking, traffic and/or pedestrian safety of such uses. For example, the proposed 133 space faculty/staff parking lot will not adequately serve these special events and, therefore, vehicles will park in the adjacent residential neighborhoods. The REIR further fails to state whether this parking lot will be made available for such events or if the wrought iron gates and access arms, designed “to prohibit access to non staff during school hours,” will cause this lot to be unavailable during such events, thereby exacerbating the effects on the surrounding neighborhood. (Exh. DD.) LAUSD must develop and commit to contingency plans to efficiently and safely circulate and park the patrons arriving and departing special events.

D-3

Air Quality

4. The analysis of the air quality impacts of the Expanded Project set forth in the REIR fails to include all of the project’s impacts. The REIR describes the Air Quality Model Outputs in Appendix A; however, as shown on the maps on pages 50-54 of Appendix A, the analysis only analyzed the impacts of the Original Project, not the Expanded Project.

D-4

5. The REIR’s methodology to evaluate the long-term project operational emissions from mobile sources is faulty and understates the Expanded Project’s environmental effects. (REIR, p. 3B-21.) The URBEMIS2007 computer model was used to compile long-term project operational emissions from mobile sources. In calculating mobile source emissions, the URBEMIS2007 used the trip length assumption of .25 miles per trip specified by LAUSD for student vehicles traveling to and from central region **elementary schools.** (REIR, p. 3B-21.) This assumption is inapplicable to the analysis of the air quality impacts of a **high school** designed to “relieve overcrowding” at Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the Expanded Project, respectively.

D-5

6. The effect of operational emissions on air quality standards is understated in the REIR at page 3B-7. The operational emissions were compiled using daily trips based on the Traffic Study

D-6
↓

performed by KOA in July 2008. However, the Traffic Study was based on the Original Project, not the Expanded Project. Therefore, the study omits all trips generated by uses of the Expanded Area. Because the Traffic Study's trip counts are understated and used the improper trip length described above, the operational emissions analysis understates the Expanded Project's impacts.

D-6
cont.

7. The REIR's failure to study or mitigate the air quality impacts of SRHS #9 is further discussed with regard to Comment C-17 below.

D-7

Hazardous Materials.

8. The project site is contaminated with a variety of hazardous materials. Currently, there are no environmental clearances from or approvals by DTSC. (REIR, p. 3D-8.) The REIR states that the DTSC and LAUSD have divided the site into five areas of investigation (aka Operable Units or OUs), OU1 (soil portion north of Tweedy), OU2 (soil portion south of Tweedy), OU3 (groundwater throughout the site), OU4 and OU5 (streets and parking lot). The REIR states that LAUSD is required to comply with Education Code section 17213, *et seq.*, which section requires that no site development occur prior to removal of existing hazardous materials pursuant to DTSC approval. Therefore, the REIR concludes that all residual impacts are less than significant because no development will occur prior to removal of existing hazardous materials pursuant to DTSC approval. (REIR, p. 3D-8.) However, this conclusion is contradicted by the project timeline set forth in the REIR.

D-8

a. The clearance timeline according to Section 3D of the REIR is:

i. OU1. Clearance from DTSC is expected in October 2009.

ii. OU2. Clearance is anticipated by approximately 2012.

iii. OU3. The REIR anticipates that a Remedial Investigation/Feasibility Study (RI/FS) will be submitted to DTSC in late 2009. A RAP will be prepared for DTSC review and concurrence. DTSC must then review and concur with the RAP. The RAP will then be implemented and a timeframe for groundwater cleanup provided.

iv. OU4 and 5. Clearance is not anticipated until late 2009.

a. The clearance timeline provided in the Hazardous Materials section conflicts with the construction timeline provided in the Air Quality section of the REIR. According to Section 3D (Hazardous Materials), the last environmental clearance is anticipated to take place by 2012. However, according to Section 3B (Air Quality), the target opening date of the school is fall 2012 and construction will begin in the summer of 2010 and be completed in

the summer of 2011. (REIR, p. 3B-23.) This means that construction will begin prior to environmental clearances, contrary to the statements in Section 3D (Hazardous Materials).

Based on the assertion that no development will occur prior to removal of the hazardous materials pursuant to DTSC approval, the REIR states that no mitigation measures are required. However, if construction occurs according to the timeline in Section 3B (Air Quality) and prior to DTSC approval, then mitigation measures are legally required.

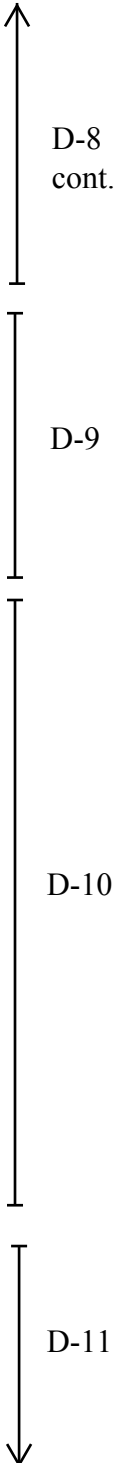
9. The REIR fails to study or account for the effect of the significant hazardous materials existing on the Expanded Area and their impacts on and hazards to (i) high school students playing on the turf fields and hardcourts planned for the Expanded Area; (ii) other children and adults playing on the turf fields and hardcourts planned for the Expanded Area during non-school hours; (iii) soil and/or groundwater from landscaping, maintenance and watering the turf overlying these contaminated properties; and (iv) urban runoff from this contaminated property to storm drains, such as runoff from rainfall, irrigation of fields, etc. that will drain off-site.

10. The REIR 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 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 REIR must include mitigation measures for these pollutants.

The REIR’s failure to adequately study or mitigate the Expanded Project’s hazardous materials impacts is further discussed in reference to Comments C-18 – C-20 below.

Noise.

11. The REIR fails to adequately study the noise impacts of the Expanded Project on the properties abutting the Expanded Area along Aldrich Road. These properties will suffer effects similar to the properties adjacent to the site on Wood Avenue, which properties were studied; the REIR’s failure to study the project’s effects on the Aldrich Road properties violates CEQA. In particular,



- The REIR failed to study the Community Noise Equivalent Level (“CNEL”) of any property along Aldrich Road (REIR, p. 3E-6); and
- The REIR failed to study the potential roadway noise levels along Aldrich Road. (REIR, p. 3E-18.)

D-11
cont.

12. The REIR asserts that operational noise impacts from “student activity on-site (especially within the playfield and track field) . . . would be limited to school hours.” (REIR, p. 3E-19.) This assertion contradicts the asserted objectives of the Project in the REIR to:

“Create schools that are the center of community engagement **both during and outside of normal operating hours.**”

and

“Maintain or increase existing opportunities for **after school athletic and extra-curricular activities.**”

D-12

(REIR, p. ES-1.)

This assertion is further contradicted by the plan to light the baseball and football stadiums, which lights are only needed for events occurring outside school hours. (REIR, p. ES-3.)

The REIR’s failure to adequately study or mitigate the noise impacts of the Project is discussed further in Comment C-21 below.

Pedestrian Safety.

13. LAUSD improperly limits the scope of its analysis of pedestrian safety impacts based on an alleged MOU between LAUSD and the City. However, as noted above, no such MOU was ever executed by the City and, indeed, the City objected strongly to the scope of study proposed by LAUSD. (Exhs. E-G, CC.)

D-13

14. The REIR fails to analyze the conformity of the proposed pedestrian facilities (e.g. sidewalks) to the pedestrian facilities required by the General Plan or the adequacy of such facilities to accommodate pedestrian traffic to and from events at the football and baseball stadiums.

D-14

15. LAUSD further improperly limited the scope of its analysis of pedestrian safety impacts based on the results of the NOP/IS. However, the NOP/IS did not examine the environmental effects of the proposed playfields and hardcourts on the Expanded Site. (NOP/IS Figures 2.3, 2.4.) By its own statements, LAUSD limited the REIR’s environmental analysis “based on the

D-15

determinations made in the Initial Study for issues that were potentially significant,” therefore, it has failed to consider any pedestrian safety impacts regarding the proposed use of the Expanded Site.

↑ D-15
cont.

16. The REIR states as its mitigation measure that LAUSD “shall coordinate with the City of South Gate . . .” to accomplish certain improvements. (REIR, pp. 3F-8, 3F-11.) This is inadequate. Coordination is not a commitment or a mitigation measure; 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. As stated in the REIR, the mitigation measures do not require LAUSD to finance the listed improvements and programs and, therefore, such measures are inadequate.

D-16

17. The REIR misrepresents the project site area: “The following streets act as boundaries to the proposed project site: Wood Avenue, Atlantic Avenue, and Tweedy Boulevard.” (REIR, p. 3F-1.)

D-17

18. The Pedestrian Safety analysis fails to state the derivation of its claim that the pedestrian volume is 49 persons at Adella Avenue and Southern Avenue, and 48 persons at Atlantic Avenue and Wood Avenue. (Traffic Study, pp. 62-63; REIR, p. 3F-9.)

D-18

19. The Pedestrian Safety analysis states that the acceptable gap time is 24 seconds for the intersection of Atlantic and Wood and 16 seconds for the intersection of Adella and Southern, based on the methodology in Appendix D. However, the REIR does not contain an Appendix D. (Exh. Z.)

D-19

20. LAUSD proposes to prohibit pedestrian crossing at the Atlantic/Wood and Adella/Southern intersections. (Traffic Study, p. 64.) However, the REIR fails to identify any alternate location(s) at which these pedestrians may cross the street or the effects the diverted pedestrians will have on such intersection(s) or on pedestrian safety.

D-20

21. The REIR states that a pedestrian signal is required at the Atlantic and Wood intersection, which intersection has a level of service (“LOS”) of F. It fails, however, to consider the effect the pedestrian signal will have on traffic at this intersection. (Traffic Study, p. 60.) Further, the mitigation measures in the REIR do not require LAUSD to finance a pedestrian signal; therefore, such measures are inadequate.

D-21

Public Services.

22. The REIR fails to study the effect of the Expanded Project on calls for police, fire, paramedic, and/or other public safety services. The REIR only considers the effects of the Original Project.

D-22

23. The REIR fails to study the effect of the Expanded Project on Water and/or Sewer infrastructure. The REIR only considers the effects of the Original Project.

D-23

24. The REIR fails to study the effect of the Expanded Project on NPDES compliance. The REIR only considers the effects of the Original Project.

D-24

The REIR's failure to properly study or mitigate the impacts of SRHS #9 on public services and/or infrastructure is further discussed with regard to Comments C-22 and C-24 below.

Traffic

25. The Traffic Study prepared by LAUSD and on which the REIR relies suffers numerous defects that cause the REIR to violate CEQA. The City identified these failings in detail in its several letters to LAUSD throughout 2008. In particular, on October 8, 2008, the City's Director of Public Works sent a letter to Robin Brown detailing many of the failings of the Traffic Study and further appending the September 25, 2008 memorandum from Hartzog & Crabill outlining the deficiencies of the Traffic Study. (Exh. CC.) The City incorporates by reference each of the comments set forth in its October 8, 2008 letter and the September 25, 2008 Hartzog & Crabill memorandum, which documents are attached collectively hereto as Exhibit CC.

D-25

26. The Traffic Study fails accurately to account for the number of inbound and outbound students attending SRHS #9 per day. For instance, on page 60, the Traffic Study states that during the morning, inbound students will arrive via the following means:

- 301 car trips
- 113 walk/bike trips
- 108 bus, public transportation and other trips

D-26

Therefore, the 301 car trips must carry 1,210 students (i.e. 4.02 students per vehicle) in order to account for all 1,431 students who will attend SRHS #9. This assumption is simply unbelievable. Further, the California Vehicle Code expressly and strictly restricts provisional drivers for one (1) year from transporting persons under the age of 21 and, when this fact is considered, the Traffic Study's calculations are rendered even less believable as student drivers under age 18 are prohibited by law from carpooling during the entire first year they hold a driver's license. The Traffic Study simply does not account for all 1,431 students or 1,431 student trips.

27. The Traffic Study states that the "busing program for the school" will consist of two low-capacity buses (20 feet or shorter). (Traffic Study, p. 28.) The quantity and capacity of the asserted "busing program" is not clearly articulated, in light of verbal statements from LAUSD representatives that the small (presumably low capacity) buses will serve disabled students. Overall, the Traffic Study does not describe fully or accurately the quantity and capacity of the asserted "busing program," which program appears totally inadequate to serve a high school of 1,431 students,

D-27

especially a high school designed to “relieve overcrowding” at Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the Expanded Project, respectively.

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28. The Traffic Study fails to consider the impact of students arriving by public transportation or pedestrian traffic between bus stops and SRHS #9. (Exh. FF.)

↑ D-28

29. The project studied in the Traffic Study encompasses only the Original Project area. (Traffic Study, pp. 1-71.) Accordingly, no study was conducted of the traffic impacts of the Expanded Area. The additional trips generated by use of the Expanded Area can be expected to exacerbate the significant impacts identified in the REIR as well as create additional impacts.

↑ D-29

30. The Traffic Study fails to consider or discuss the impacts on traffic or parking of events at the lighted football and baseball stadiums.

↑ D-30

31. The Traffic Study and mitigation measures fail to consider the need for signal interconnection on Tweedy between Atlantic and Rosewood.

↑ D-31

32. The Traffic Study and REIR fail to analyze existing conditions on Aldrich west of Adella.

↑ D-32

The REIR’s failure to adequately study or mitigate the traffic impacts of SRHS #9 is further discussed below regarding Comments C-2 – C-11 and D-1, D-6 and D-10.

Parking

33. The City raised the issue of the need for student parking on March 10, 2008 and again on April 9, 2008 regarding the Original Project. (Exhs. D, E.) In response, LAUSD represented that “parking will be analyzed as part of the CEQA process.” (Exh. D.) However, LAUSD has failed to study the parking impacts of the Expanded Project and failed to provide adequate parking for either the Original or Expanded Project.

↑ D-33

34. The parking analysis in the REIR relies on the Traffic Study’s count of 346 existing parking spaces in the surrounding neighborhood. (Traffic Study Figures 23, 24A, 24B, pp. 51-53.) That count includes 26 spaces that are located within the site plan for the Expanded Project, i.e. where the southern playfields are going to be located. (*Id.*; REIR Figure 2.1.) Therefore, the REIR relies on the existence of parking spaces that will no longer exist post-project based on the new site plan.

↑ D-34

35. The REIR nowhere studies or discusses the parking impacts of events at SRHS #9 during non-school hours (i.e. sporting and other extra-curricular events and activities at the lighted football and baseball stadium, gymnasium, theatre and other facilities). This omission is particularly troubling in light of LAUSD’s stated intent to facilitate and encourage such activities as well as its statements that the **only** parking lot at SRHS #9 (the 133 space faculty/staff lot) will be secured by

↑ D-35
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10-foot high wrought iron fencing, with a locked gate, and further controlled by a security arm/gate with access only via passcard, which lot will be inaccessible during non-school hours. Therefore, there will exist no on-site parking whatsoever for these extracurricular events. (Exh. DD.)

D-35
cont.

36. LAUSD relies on a study of a single high school to reach the conclusion that it need not provide student parking for a campus planned to serve 1,431 students. However, the Bell High School parking study on which LAUSD relies is both an inappropriate benchmark and inaccurate. The Bell parking study is premised on the assumption that Bell High School was populated with 4,500 students at the time of the Bell parking study. (Traffic Study, p. 49.) However, at the time of the study, Bell High School enrolled only 4,326 students. (Exh. H.) The Bell parking study, even if using this inappropriate benchmark or standard, is inaccurate and cannot form the basis of LAUSD's parking conclusions. Even if corrected, it supports a conclusion that 141 parking spaces are required at SRHS #9, not 131.

D-36

The foreseeable impacts on the surrounding residential neighborhood are inevitable; the conditions will likely trigger the need to establish and enforce a "residents only" parking permit program and/or limited short-term parking posted in order to prevent the neighborhood from being impacted by students and visitors to the high school and adjacent athletic fields from monopolizing and overtaking the neighborhood's on-street parking.

37. With regard to the on-street parking supply, the Traffic Study states on page 49 that "[t]he total weekday area supply, based on on-street parking restrictions during a typical day of street cleaning, is approximately 346 spaces." It further states that "street sweeping restrictions would cause students to park elsewhere." However, the Traffic Study does not indicate to what location student parking is diverted or the distance of such parking spaces from the school.

D-37

The complete inadequacy of the REIR's study and mitigation of parking for the Expanded Project is further discussed in Comments C-12 and C14 below.

Overcrowding Effects

38. None of the REIR or its supporting studies discusses the effects of likely overcrowding at SRHS #9 in future years. LAUSD has a history of overcrowded schools. Based on this history, it is more than likely that SRHS #9 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.)

D-38

The immediate overcrowded conditions at South East are not an isolated incident. LAUSD opened the Santee Learning Complex in 2005-06—the same year as South East. That school was built for a maximum of 2,957 students. (Exh. K, p. ES-3.) In 2008-09, fewer than five years after opening, it is more than 20% over its maximum capacity with 3,601 students. (Exh. L.)

LAUSD’s failure to adequately study the actual uses to which it puts its facilities is further demonstrated by its conduct regarding the International Studies Learning Center (“ISLC”) in 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, it was planned and studied to have six (6) classrooms and serve approximately 87 students with a maximum capacity of 120 students. (Exh. I.) Instead, it 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.)

LAUSD’s mantra that SRHS #9 will only ever enroll 1,431 students is belied by its own past conduct at nearby schools in South Gate. LAUSD regularly over-enrolls its schools and must account for this likely event in its planning and mitigation measures for SRHS #9.

The REIR’s failure to adequately study or mitigate the effects of likely overcrowding at SRHS #9 is further discussed with regard to Comment C-25 below.

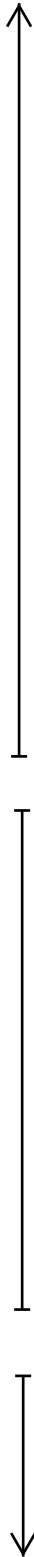
Cumulative Impacts.

LAUSD failed to contact the City of South Gate and other neighboring cities to obtain an updated list of related projects for the cumulative impacts analysis since the change of the project scope to include the turf playfields and hardcourts south of Tweedy Boulevard. For example:

- a. The REIR improperly fails to include the Cudahy project on Atlantic in its cumulative impacts analysis.
- b. The REIR improperly fails to include the IRS expansion at Southern and Atlantic in its cumulative impacts analysis.
- c. The REIR improperly fails to include in its cumulative impacts analysis the industrial use at Burtis and Southern that will involve extensive use of chlorine.

**CITY OF SOUTH GATE AND COMMUNITY DEVELOPMENT COMMISSION
OF THE CITY OF SOUTH GATE COMMENTS TO ORIGINAL EIR**

Prior to the addition of the Expanded Area to the proposed project, LAUSD circulated the DEIR for the Original Project, took comments from the City, among others, and circulated a Final EIR (“FEIR”) in February 2009. In the FEIR, LAUSD made certain agreements and commitments



D-38
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D-39

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regarding mitigation of the effects of the Original Project. LAUSD has wholly omitted these agreements and commitments from the REIR. Accordingly, the City attaches as Exhibit A hereto and incorporates by reference its comments to the DEIR. Presuming LAUSD intends to provide the same commitments and agreements regarding mitigation as set forth in the FEIR, the City provides the following additional comments:

Comment C-2.⁴ In order to describe the improvements to Tweedy Boulevard needed as a direct result of the Expanded Project, the City's Comment C-2 states the standards for a collector roadway, then states that the City would accept certain lesser standards if comments made by the City and Hartzog are adequately addressed by LAUSD. LAUSD's response and the FEIR indicate that LAUSD has incorporated improvements to Tweedy Boulevard that do not meet even the minimum standards required for a collector roadway, nor do the improvements proposed by LAUSD comply with the compromise standards suggested by the City, as set forth in the Comment Letter.

LAUSD's response to Comment C-2 states that even the minimal, insufficient Tweedy Boulevard improvements to be provided as a mitigation measure by LAUSD will "require cooperation from the City" and LAUSD threatens to approve the Expanded Project without any Tweedy Boulevard improvements by prejudging its adoption of a statement of overriding considerations with respect to the impacts to Tweedy Boulevard "if these improvements are not made." The complete inadequacy of Tweedy Boulevard to accommodate 1,431 high school students is visually depicted in the photographs attached as Exhibit M hereto. LAUSD states that the further widening of Tweedy Boulevard requested by the City to meet the established standards for a collector roadway is infeasible due to the configuration of adjacent parcels. The need for acquisition of right-of-way or reconfiguration of road improvements is not a valid basis to ignore this environmental impact or exclude it as a necessary mitigation measure. LAUSD's response to Comment C-2 does not acknowledge ongoing negotiations between City and LAUSD representatives toward a Memorandum of Understanding with respect to the improvements to Tweedy Boulevard that will be necessitated by both the Original Project and the Expanded Project, nor does it address the City's concerns regarding the impacts if the Expanded Project is placed in service prior to completion of the needed improvements to Tweedy Boulevard.

The Expanded Project design includes minimal improvements to Tweedy Boulevard to convert it from what is it is now, a poorly improved alley with a center culvert, no curbs, no gutters, no sidewalks and pot-hole ridden, into a more standard public street. The REIR does not include as a mitigation measure, and LAUSD representatives have not agreed to date by separate contract, the widening of Tweedy Boulevard to 60 feet to accommodate two traffic lanes (one in each direction), two parking lanes, and two sidewalks, as proposed by the City as a compromise. The City's

⁴ The City's comments to the DEIR are referred to herein by the designations given to them in the proposed FEIR circulated by LAUSD in February 2009.

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General Plan calls for, and the preferred improvements include, widening Tweedy Boulevard to 80 feet with four traffic lanes (two in each direction), with parking lanes and sidewalks on both sides of the street. Instead, LAUSD's response to Comment C-2 states that the Expanded Project design only contemplates improvement of Tweedy Boulevard to provide for one traffic lane in each direction, one parking lane on the south side, and one sidewalk on the north side (i.e., without two lanes of traffic in each direction, no parking lane on the north, and *no sidewalk on the south side of the street*). The street improvements proposed by LAUSD are insufficient to provide adequate and workable access to the Expanded Project from Tweedy Boulevard and present a public safety issue for pedestrians and vehicles to and from the high school. Tweedy Boulevard is much wider at its intersection with Atlantic Avenue than it is as it approaches the Expanded Project and this road now is not straight, but winds by existing heavy industrial businesses. When the new high school traffic is added, including, without limitation, school buses and daily start and end of school high volumes of vehicles, completion of SRHS #9 will cause unsafe road and traffic conditions, including, without limitation, bottle neck and back up, causing traffic congestion at the intersection of Tweedy and Atlantic along with unsafe conditions for pedestrians as pedestrians will be forced to use one sidewalk to walk to and from the new high school. One can easily visualize hundreds and hundreds of students walking to and from the campus each school day morning and afternoon, all being forced to fit onto a single sidewalk, which will more than likely result in student pedestrians spilling onto and walking in the public street.

Indeed, hazards to students and impacts on traffic resulting from inadequate sidewalks and/or parking already exist at one LAUSD school in the City of South Gate. Students at South East crowd and block the streets and are shown in Exhibit N hereto walking in the middle of intersections (some while talking on a mobile phone) at the corner of Tweedy and Truba. At the ISLC, cars are parked (and double parked) on Sequoia Avenue due to LAUSD's failure to provide adequate parking. (Exh. O.)

The City, including the Police Department and Public Works staff, have surveyed, monitored, and taken photographs of existing conditions for access, both pedestrian and vehicular, and on-site parking at both of LAUSD's high schools in the City, South Gate High and South East High. Both high schools evidence a history of significant traffic congestion, inadequate parking, and pedestrian congestion, particularly at school day start times and school day end times and for special events, such as sports, theatre, and open houses. Attached hereto as Exhibit P is a memorandum from the City's Police Department, which reveals and evidences existing issues regarding traffic, access, and public safety at LAUSD high schools. There is no evidence to suggest or support LAUSD's theory that these same issues will not occur at the Expanded Project; to the contrary, this information shows the reality of the environmental impacts on traffic and public safety (also due to lack of parking as discussed hereinafter) that must be addressed and mitigated by LAUSD in its final EIR.

Tweedy Boulevard is proposed as one of only two access points to SRHS #9; the other access point routes traffic through the existing single-family residential neighborhood adjacent to the

D-40
cont.

Expanded Project, at Adella Avenue. As discussed in more detail below, the City objects to LAUSD's plans to permit school buses and delivery and maintenance trucks to access the Expanded Project through the residential neighborhood at Adella Avenue.⁵ Instead, the City believes it is more appropriate to route buses and delivery and maintenance vehicles through an improved and widened Tweedy Boulevard to avoid serious, significant impacts to the adjacent residential neighborhood. Currently, and as noted above, Tweedy Boulevard becomes very narrow and winds as it approaches the Expanded Area and traffic is likely to back up due to the narrow street width, configuration, lack of a passing lane and absence of a parking lane on one side of the street.

The City is also concerned about the location of and having only a single parking lane on-street and having only one sidewalk on Tweedy Boulevard as described above. This layout will result in the need for individuals parking along Tweedy Boulevard to cross the street to access the sidewalk, which is likely to result in danger to pedestrians and increased traffic circulation impacts along this stretch of Tweedy Boulevard.

LAUSD representatives have indicated verbally that buses dropping students off at school in the morning and picking them up in the afternoon will enter the school through Tweedy Boulevard and Adella Avenue, drive into the Expanded Area, proceed around a roundabout to the drop off zone, and leave through Tweedy Boulevard and/or Adella Avenue. This representation is inconsistent with the Conceptual Site Plan included as Figure 2.1 in the REIR. Further, LAUSD has failed to provide an explanation of how buses dropping students off for sporting and other events at the Expanded Project will be handled or where these buses will be permitted to park during such events. If buses and other vehicle(s) stop for any length of time at the Tweedy Boulevard entrance to the Expanded Project, this will cause traffic and circulation problems that could in turn impact the intersection of Tweedy Boulevard and Atlantic Avenue as well as other nearby streets. In addition, any traffic circulation problem at the Tweedy Boulevard entrance to the Expanded Project will cause cars, buses, and delivery and maintenance trucks to use, or try to use, the Adella Avenue entrance to the Expanded Project, resulting in additional unmitigated and unanalyzed impacts to the surrounding residential neighborhood.

LAUSD's unwillingness to address and mitigate, or otherwise compromise with the City, regarding these important street improvements to Tweedy Boulevard that are necessitated only by completion of SRHS #9, and LAUSD's threat in the FEIR to adopt a statement of overriding considerations with respect to the traffic impacts of the Expanded Project notwithstanding that the street improvements reasonably suggested by the City will significantly reduce these impacts, shows

⁵ As discussed below with respect to Comment C-8, LAUSD representatives have verbally clarified that certain buses will not be permitted to enter the Project through Adella Avenue, but instead will only be permitted to exit the Project from that access point. This is not made clear in the REIR and the City cannot rely on the verbal assurances of LAUSD staff members; thus, the REIR must not be certified until this mitigation measure is formally incorporated.

that LAUSD has in reality made a pre-judgment to undertake the Expanded Project regardless of the results of the environmental investigations and analyses conducted in connection with the various iterations of the EIR, in violation of CEQA. LAUSD's stated intention to override significant impacts without good faith consideration of reasonable and feasible mitigation measures evidences bad faith and non-compliance with CEQA.

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D-40
cont.

Comment C-3. Comment C-3 requested that LAUSD study the traffic impacts at the intersection of Atlantic Avenue and McCallum Avenue and along McCallum Avenue from Adella Avenue to Atlantic. Adjacent and nearby roadways near Tweedy Boulevard can and will become "short-cuts" to access the Expanded Project and should have been a part of the impacts studied and potentially mitigated in the REIR. In its response to Comment C-3, LAUSD denies SRHS #9 will have any impact on McCallum Avenue and states that although the City provided comments on the "scoping document," the City did not request that McCallum Avenue be studied. As noted above, LAUSD has patently misrepresented the parties' negotiations regarding the scope of the traffic and pedestrian safety studies for the Original Project. Further, as discussed above, LAUSD has never conducted any scoping discussions regarding the Expanded Project.

D-41

Comment C-4. Comment C-4 states that a new access road must be constructed along with a bike stop facility and a bike path to connect to the existing bike route at the Los Angeles River. LAUSD responds that a new access road will be constructed (although it is not clear if the same access road is referenced in the comment), and that LAUSD will grant the City an easement to the existing access ramp to the Los Angeles River bike trail, if requested by the City. However, LAUSD failed to include this commitment as a mitigation measure in the REIR.

D-42

Comment C-6. Comment C-6 states that the new access road serving the industrial facilities and the alignment with the bus access on the north side of Tweedy Boulevard must be public facilities, and must be clearly designated as "bike streets" or bike facilities by signage. LAUSD's response refers to the "alignment with faculty parking access" as opposed to "bus access" and does not state that these will be public facilities as requested.

D-43

Comment C-7. Comment C-7 states that the "proposed access road" must be consistent with the City's General Plan for land designated as "Local Commercial/Industrial" and provides the required dimensions for the access road. LAUSD's response is unclear as to whether the access road will be constructed to the dimensions set forth in Comment C-7 and instead merely states that the access road will not conflict with the City's General Plan or land use designations.

D-44

Comment C-8. Comment C-8 states that LAUSD must not permit buses to access SRHS #9 from Adella Avenue and the residential area to the north of the Expanded Area. LAUSD's response indicates that LAUSD does intend that buses will access the Expanded Project through Adella Avenue and the residential area to the north of the Expanded Project. Further, LAUSD has informed the City that all trash trucks, all delivery trucks, and related maintenance, utility, and service trucks and

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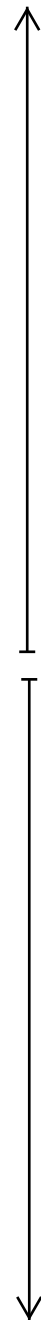
vehicles will access the Expanded Project to and from Adella Avenue. And, faculty and staff access to and from the Expanded Project will also use Adella Avenue. The intended use of Adella Avenue, a road within an existing single-family neighborhood with limited local neighborhood traffic, as a major ingress and egress point to the Expanded Project will create significant neighborhood impacts and serious impacts on traffic volume, traffic circulation, pedestrian safety, and noise levels in the residential neighborhood adjacent to the Expanded Project. These impacts must be mitigated either through required mitigation measures or through a revised project design and changes to access to SRHS #9 that avoid or limit use of Adella Avenue.

LAUSD representatives have verbally represented that full-size LAUSD school buses⁶ will not be permitted to enter SRHS #9 through Adella Avenue, but instead will only be permitted to *exit* SRHS #9 from that access point. However, this commitment is not included in the REIR and the City cannot rely on the verbal assurances of LAUSD staff members; thus, the REIR must not be certified until this commitment is included as a mitigation measure. In addition, the impacts of using Adella Avenue as an exit for buses must be analyzed in the REIR; and, as discussed above, using Tweedy Boulevard as the access point for buses provides an additional basis to require that Tweedy Boulevard be improved and widened to an appropriate width to adequately serve SRHS #9 and impacts created by it.

Comment C-10. Comment C-10 relates to the design and use of the public cul-de-sac to be constructed at the north SRHS #9 entrance from Adella Avenue. The City made several suggestions regarding this cul-de-sac, including that “[f]ood service vehicles, delivery vehicles, maintenance vehicles, student vehicles, and visitor vehicles” not be permitted access through this cul-de-sac. LAUSD’s response states that “delivery/utility vehicles” will be allowed access to the site from this cul-de-sac, along with pedestrians and faculty/staff. It is unclear from LAUSD’s response and the REIR, precisely which “delivery/utility vehicles” will be permitted to access SRHS #9 through this cul-de-sac; however, the broad phrasing used in LAUSD’s response is best interpreted to indicate that any and all deliveries and maintenance, utility, and service vehicles will be routed through this access point. The City reiterates its serious concerns regarding the noise, traffic and general nuisance impacts to the existing single-family residential neighborhood adjacent to the Expanded Project from trash trucks, delivery vehicles, maintenance vehicles and buses, not to mention faculty and staff vehicles that will be routed through this access area of the Expanded Project. LAUSD has not adequately addressed or mitigated the impacts of SRHS #9 in this respect.

LAUSD did not respond to the City’s comment regarding the distance from the proposed curb face to the property line or the Fire Department’s approval of the plans for the cul-de-sac.

⁶ These statements are further inconsistent with the statement in the Traffic Study that the entire busing program will consist of two low capacity buses. (Traffic Study, p.28.)



D-45

D-46

LAUSD's response to Comment C-10 indicates it will comply with the City's request that a wrought iron fence be used at this location, except that a CMU (concrete block wall) will be constructed to shield trash enclosures from visibility. However, the specific location of the wrought iron fence is not clear in the FEIR or from LAUSD's response. Further, the potential for graffiti and similar vandalism to the new CMU should be addressed in the REIR. While in referenced meetings, LAUSD shared drawings with City staff depicting the location of the fencing/walls, these drawings also should be included in the final EIR.

D-46

Comment C-11. LAUSD's response to Comment C-11 flatly rejects the City's suggestion to have the Adella Avenue approach on the south side of the new public access road terminate in a public cul-de-sac, without adequate explanation of the impact or its mitigation. (Guidelines § 15204(a).)

D-47

Comment C-12. Comment C-12 suggests that LAUSD not permit pedestrian access at the north and south cul-de-sacs at Adella Avenue. LAUSD's response to Comment C-12 indicates that LAUSD has rejected this suggestion and plans to provide pedestrian access at the north and south access points from Adella Avenue. LAUSD asserts that permitting pedestrian access at these points will help to avoid potential pedestrian safety impacts. The City disagrees; permitting pedestrian access through Adella Avenue will result in significant noise, traffic and pedestrian safety impacts to the neighborhood that can be avoided or mitigated by limiting pedestrian access per the City's comments.

D-48

Comment C-14. Comment C-14 relates to the fact that LAUSD plans for the new high school Project to include *no* on-site student parking and no on-site visitor parking. LAUSD's response to Comment C-14 asserts that sufficient parking is provided by the Expanded Project design, and students and visitors are expected to park their vehicles off-site on surrounding public streets, including existing residential neighborhood streets. LAUSD bases its assertion that no parking impacts will result from the Expanded Project solely on the faulty Bell parking study and the single standard set forth for urban schools in *ITE Parking Generation* (3rd Edition). LAUSD asserts that for an initial student population of 1,431 students there will be 53 classrooms, lighted football and baseball stadiums, a gymnasium, meeting areas, food service area, and other appurtenant school facilities for a full-service high school, but only 133 total parking spaces on site for all faculty, staff, students and visitors. The City asserts that comparing the Expanded Project to only one other high school to determine the estimated parking needs of a new high school is patently inadequate, wholly short-sighted, and fully insufficient, even if the parking ratio is stated in one referenced standard. The assumption that SRHS #9 is an "urban" school somehow comparable to downtown San Francisco or mid-town Manhattan is unfounded.

D-49

In fact, more relevant evidence of parking needs at a high school in South Gate is found at the two existing LAUSD high schools in the City: South Gate High and South East High. The memorandum attached hereto as Exhibit P prepared by the City's Police and Public Works Departments, including consultation with the principals of both high schools and study surveys,

evidences that students drive vehicles to these schools at a rate of .027 and .058, respectively; these figures do not include any vehicles driven by faculty or staff. The evidence further demonstrates serious existing traffic, parking, and pedestrian safety issues at these high schools, which more than likely will also occur at SRHS #9. (Exhs. N, O, Q.) Contrary to the assertions set forth in the response to Comment C-14, local streets cannot absorb the additional 39-72 parking spaces demanded by students attending SRHS #9. No student parking at the Expanded Project is infeasible and LAUSD's failure to address the issue in the REIR violates CEQA.

LAUSD's plan to require all high school students and all visitors to the high school to park on existing city streets, especially streets in a nearby residential neighborhood is unrealistic and evidences that LAUSD has little to no concern for the daily impacts a new high school will have on traffic congestion, safety of pedestrians, road conditions, air quality, and noise levels within the areas surrounding the Expanded Project. The lighted football and baseball stadiums, gymnasium, multiple athletic fields, tennis courts, and other athletic facilities to be used by the high school and visiting teams from girls and boys varsity, junior varsity, and frosh/soph sports, as well as the many other extracurricular activities at a high school, such as theatre, choir, debate, mock trial, clubs, etc., which all keep students on campus, bring students back to campus, and bring visiting students and teams to campus, all impact parking needs and traffic concerns. There is not adequate parking on-site planned for these regular high school operations and activities. This impact cannot be left to be handled by the City and must be addressed and mitigated by the REIR.

Further, in its response to Comment C-22 in the FEIR relating to water impacts, LAUSD states that many students at the new high school will be attending from out of the area, not from the nearby neighborhood(s), thus those students will arrive by car, bus, or students driving themselves. This fact is admitted, but its impacts on traffic and parking needs remain unaddressed.

LAUSD indicates that students and visitors can and will be expected to park off-site on public streets, which includes an existing residential neighborhood and the access road planned for two existing nearby industrial businesses. The significant impacts to a residential neighborhood with the many students' and visitors' cars that will park in front of homes and businesses, rather than these on-street spaces being available to residents and business patrons, will result in parking and traffic issues that do not now exist in the community, which impacts need to be addressed and planned for by LAUSD on-site at SRHS #9; LAUSD may not solely rely on off-site parking.

LAUSD's stance on this issue is particularly troubling in light of recent issues regarding parking at other LAUSD high schools in South Gate. As evidenced in the email from Dr. Guillermina Jauregui, Principal of ISLC located in the City, which email is attached hereto as Exhibit Q, parking at ISLC is limited in the same manner as LAUSD proposes to limit parking at SRHS #9. Due to the limited parking, ISLC staff and parents are forced to illegally park on the streets surrounding ISLC. The administration has requested on behalf of faculty, staff, and students' parents who have received citations for being double-parked, parking in a red zone, or otherwise parking or

D-49
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stopping illegally that the City have the citations dismissed. As depicted in the photographs attached as Exhibit O, this is not an isolated incident. LAUSD's efforts to construct another high school in South Gate without providing adequate parking violates CEQA.

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Comment C-15. No response is provided to the comment regarding LAUSD's obligation to prepare a parcel map. Verbally, LAUSD has stated it will prepare and process a parcel map; this commitment should be included in the REIR.

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D-50

Comment C-16. LAUSD provided no response to the City's comment regarding LAUSD's obligation to pay development fees. However, Government Code Section 54999, *et seq.* provides that school districts must pay "capital facilities fees," which include water impact fees and connection fees. The same Government Code provisions require that the City and LAUSD negotiate in good faith toward an agreement regarding the amount and payment of the City's capital facilities fees, including water impact fees. The City previously provided specific information and details regarding its calculation of the fair share of water fees that should be paid by LAUSD to mitigate the Original Project's impacts. LAUSD's non-response to the City's correspondence or in any of the several iterations of the EIR is not in compliance with CEQA or Government Code requirements.⁷

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D-51

Comment C-17. Comment C-17 requests that analysis be included in the final EIR regarding the carbon monoxide impacts expected from SRHS #9. LAUSD's response points to some information regarding carbon monoxide in the DEIR; however, the cited CO hotspot analysis is based on the faulty assumption that CO concentrations will be lower in 2012 during project operation compared to existing conditions. It bases this conclusion on the assumption that there will be a lower emitting fleet mix than what currently exists. That is, as vehicles age and no longer function properly, they are replaced in the overall fleet by newer, less polluting vehicles. The REIR's reliance on the "CARB EMFAC2007 emissions inventory model" for this proposition is ill-founded because students and staff are in a demographic likely to continue to drive older cars well into the future.

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D-52

Comment C-18. Comment C-18 relates to the contamination at the Expanded Area and DTSC's role in oversight of the remediation of the site that will be undertaken by LAUSD. LAUSD's responses rely heavily on future actions and other documentation outside of the EIR, such as the remedial action plan for the Expanded Project. The REIR must discuss in more detail the remediation plan, schedule, and methods for protecting public safety and health and welfare.

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Comment C-19. Comment C-19 relates to two nearby natural gas pipelines and one nearby petroleum pipeline. LAUSD's response relies on a Pipeline Safety Hazard Assessment which was

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⁷ In emails exchanged between City and LAUSD representatives in May 2009, LAUSD agreed to pay \$50,000 for its water impact fee, but this commitment is not yet memorialized in a contract or included as a mitigation measure.

prepared for the Expanded Project based on methods specified in the “LAUSD PSHA User Manual,” but this response does not fully or adequately respond to the City’s comment.

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Comment C-20. Comment C-20 requests additional analysis of potential hazards relating to the removal of propane tanks from the site and points out that the DEIR did not specify whether the tanks located at the site were above or below ground. The response states that there “is the potential for an above-ground storage tank to be located onsite” and that any storage tank removal would be conducted under the oversight of DTSC. This response is inadequate.

D-55

Comment C-21. Comment C-21 requests analysis of potential noise impacts before and after school hours. The response states that SRHS #9 will have a significant and unavoidable impact on noise and that a CMU sound wall will be constructed to protect the nearby residential neighborhood from noise generated at the Expanded Project. A sound wall on the Expanded Area will not help to mitigate the noise impacts resulting from the use of adjacent residential neighborhood streets for student and visitor parking as well as delivery and utility/maintenance truck access; these serious impacts have not been considered or sufficiently mitigated by the REIR. Moreover, neither LAUSD’s response to Comment C-21, nor any iteration of the EIR meaningfully addresses the noise impacts of activities occurring at the Expanded Project prior to and after normal school hours. Notwithstanding the acknowledgement that, during school hours, SRHS #9 will have a significant and unavoidable impact on noise, the impacts on noise before and after school hours should be considered, analyzed, and addressed in the REIR for the Expanded Project as it is LAUSD’s stated intent to “[c]reate schools that are the center of community engagement **both during and outside of normal operating hours**” and “[m]aintain or increase existing opportunities for **after school athletic and extra-curricular activities**”; therefore, LAUSD intends to significantly affect people in the adjacent residential neighborhood with noise from the Expanded Project before and after school hours.

D-56

Comment C-22. In response to the City’s comment regarding the impacts on police protection and public services, LAUSD states:

- (1) LAUSD has its own police force and the City of South Gate Police Department “would be the secondary provider of law enforcement services” for SRHS #9.
 - (a) LAUSD’s response does not negate the fact that the City of South Gate Police Department will be required to respond to emergencies at SRHS #9 and that City jail facilities, public resources, and other City services will be impacted by the Expanded Project. LAUSD’s response does not describe the specific allocation of responsibilities between the LAUSD police force and the South Gate Police Department. LAUSD’s response is therefore inadequate to permit interested parties including the City to determine whether the Expanded Project will be adequately served

D-57

by police agencies and what impacts are likely to result with respect to the South Gate Police Department's services.

- (2) No significant impact will result to water supplies because students are coming from other LAUSD schools.
 - (a) LAUSD's response is superficial and does not adequately address the comment. The City understands that many students will come from other LAUSD schools located outside the City of South Gate. Because the City of South Gate Water Division provides water within the City limits but not to other jurisdictions, the increased water usage is likely to have a significant impact which was not adequately addressed in the EIR.
- (3) The Expanded Project is required to comply with the LAUSD Board of Education's resolution regarding High Performance School Facilities relating to energy efficiency, water efficiency, site planning, materials, and indoor environmental quality.
 - (a) LAUSD's response that SRHS #9 will be required to comply with standards for efficiency adopted by LAUSD has no bearing on whether SRHS #9's impacts on public services will be less than significant.

Comment C-24. Comment C-24 relates to the impact on fire department response times resulting from additional traffic created by SRHS #9. LAUSD's response states that local fire jurisdictions have the right to review and approve SRHS #9 plans. The response further cites to the Program EIR for the conclusion that SRHS #9 will not impair response times. Reliance on the Program EIR for analysis of impacts as specific as the impact of increased traffic on fire department response times is inappropriate; this potential impact must be addressed specifically in the REIR as to this project based on the specific design characteristics of SRHS #9. The concerns raised by Comment C-24 also relate to the City's Comments C-2, C-3, C-7, and C-10 relating to the design of and improvements to streets surrounding SRHS #9.

Comment C-25. Comment C-25 requests additional analysis of impacts relating to increased parking needs in the event the number of staff or faculty hired to work at SRHS #9 increases in the future. LAUSD's response states that no faculty or staff increases are anticipated. As noted above, based on LAUSD's history of overcrowded schools it is not reasonable to assume that the number of faculty and staff employed at and students served by SRHS #9 will remain static over time. LAUSD has not adequately considered or analyzed this potential impact. School overcrowding at other existing high schools is what necessitated SRHS #9; it is unreasonable to presume that SRHS #9 will experience no faculty or staff increases over time.

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Comment C-27. Comment C-27 requests an analysis of alternative location(s) for SRHS #9. LAUSD's response states that no site selection process was undertaken for the proposed project; however, the response also states that "[p]ossible alternate sites are either not available or not suitable for development of the proposed project in the near term and are therefore not feasible alternatives." None of the possible alternate sites were discussed, so one cannot review or respond to the adequacy of these possible alternate sites. Importantly, because the Expanded Area is known to be highly contaminated, it is reasonable to expect an analysis of other potential locations for the Expanded Project to be contained in the DEIR, FEIR and REIR for SRHS #9. LAUSD's refusal to undertake an analysis of the availability of alternative sites creates the concern that LAUSD has, in reality, already approved the Expanded Project regardless of the environmental impacts and concerns discovered during the preparation of the DEIR, the FEIR and the REIR. The CEQA process and discretionary decision-making cannot be made a sham and pre-determined and pre-judged by LAUSD as to the Expanded Project and its location. LAUSD has owned the site for many years and a requirement that LAUSD sell the site and purchase another site not affected by hazardous materials contamination, not as near to a railroad right of way, and not as seriously affected by traffic and pedestrian safety concerns, was not evaluated because purportedly it may cost more money. Monetary concerns alone do not justify approval of an unsafe project, nor do monetary concerns justify completely disregarding necessary mitigation measures as LAUSD has done in each iteration of the EIR.

D-60

Comment C-28. No response is provided to the comment regarding preparation by LAUSD of various plans for the improvements to be constructed in connection with SRHS #9.

D-61

Comment C-29. No response is provided to the comment regarding an MOU between the City and LAUSD.

D-62

Hartzog & Crabill, Inc. Comments:

Comment D-1. Comment D-1 states that to minimize impacts to residential neighborhoods around Adella Avenue, delivery and maintenance trucks should access the school from Tweedy Boulevard through the school parking lot. LAUSD's response to this comment implies that Adella Avenue is to be used for trash, delivery and maintenance truck access but that other unspecified mitigation measures are expected to reduce the impact on the nearby residential neighborhood. The response is superficial and disputes the premise that use of Adella Avenue by delivery and maintenance trucks will cause any negative impact. As discussed above, the City strongly disagrees with this assumption and strongly believes that negative impacts will be avoided by prohibiting the use of Adella Avenue as an access point for trash, delivery and maintenance vehicles approaching the Expanded Project.

D-63

Comment D-4. Comment D-4 suggests that students not be permitted to enter the school from the north entrance on Adella Avenue and that student entrance only be permitted from

D-64

Tweedy Boulevard because of potential impacts on local residents. LAUSD's response rejects the suggestion and states that it is not required to consider potential inconveniences to local residents from pedestrian traffic. LAUSD's characterization of the impact as "potential inconveniences to local residents from pedestrian traffic" is inappropriate; permitting pedestrian access to SRHS #9 from these points may cause noise impacts as well as traffic and pedestrian safety impacts that have not been studied or adequately addressed in the REIR.

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Comment D-6. Comment D-6 suggests that all school buses be required to access the Expanded Project from Tweedy Boulevard. LAUSD declines to comply with this request. Permitting school buses to access SRHS #9 from Adella Avenue and other access points will result in unnecessary and unreasonable traffic, pedestrian safety, and noise impacts to the adjacent residential neighborhood. These impacts are similar to and will serve to compound the impacts resulting from LAUSD's intention to permit trash, delivery, utility, and maintenance vehicles to access SRHS #9 at these points.

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D-65

As discussed above in relation to Comment C-8, LAUSD representatives have verbally clarified that full-size buses⁸ will not be permitted to enter SRHS #9 through Adella Avenue, but instead will only be permitted to exit the site from that access point. Because this is not made clear in the REIR and the City cannot rely on the verbal assurances of LAUSD staff members, the REIR must not be certified until this clarification is formally made. In addition, the impacts of using Adella Avenue as an exit for smaller special needs buses must be analyzed in the REIR.

Comment D-10. LAUSD's response to Comment D-10 indicates that the impact of mitigation measures on traffic at the intersections described in the comment letter were not analyzed because they were determined to be infeasible due to the physical layout of the locations and because of the cost of implementing mitigation measures at these locations. As with LAUSD's decision not to analyze potential alternative sites for SRHS #9 or to construct needed street improvements at Tweedy Boulevard, declining to even consider mitigation measures because they are not within the budget for SRHS #9 and instead adopting a statement of overriding considerations for these impacts shows that LAUSD has in reality decided to undertake the proposed Expanded Project regardless of the results of environmental investigations and analysis conducted in connection with the EIR. Discretionary decisions and determinations under CEQA cannot be pre-judged or pre-determined.

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D-66

In response to Comment D-10's assertion that the DEIR does not identify LAUSD's pro-rata costs of the mitigation measures, the response states "It is assumed within the traffic analysis that LAUSD will directly implement the recommended mitigation measure at the intersection of Atlantic Avenue at Firestone Boulevard." If this statement means that LAUSD agrees to fund these mitigation measures in their entirety, the City has no additional comment on this specific point;

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⁸ See footnote 6.

however, the REIR does not clearly state LAUSD's assumption of all costs for these mitigation measures.

The DEIR identified the intersection of Atlantic Avenue at Tweedy Boulevard as a significant and unavoidable adverse impact during both the AM and PM peak hours. The DEIR stated that there were no feasible mitigation measures primarily because improvements would require additional right-of-way. However, neither the DEIR, the FEIR, nor the REIR considered dual northbound left-turn lanes as a potential mitigation measure. The Atlantic Median Project was recently modified to provide dual northbound left-turn lanes; therefore, dual northbound left-turn lanes were feasible mitigation measures and should have been analyzed in the EIR.

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A review of the LOS calculation worksheets identified the northbound left-turn movement as a "critical" movement for both the AM and PM peak hours. Thus, any capacity improvements for the northbound left-turn movement would result in improvements to intersection operations and potentially LOS. The dual northbound left-turn lanes may partially or completely mitigate the significant adverse impact; however, this was not analyzed in any iteration of the EIR. LAUSD should pay at least its fair-share contributions for improvements to the intersection at Tweedy Boulevard and Atlantic Avenue; LAUSD's fair-share percentages for the AM peak hour are 13.3 percent and for the PM peak hour are 8.2 percent.

Alternative Proposals

The City suggests the following project alternatives to address some of the serious traffic, pedestrian safety, noise and air quality impacts that will be generated by SRHS #9:

Alternative 1. As an alternative to the site design depicted in Figure 2.1 of the REIR, the City proposes that the southwestern-most portion of the site be utilized for student/guest/special event parking. This alternative will in no way disrupt or affect the layout of the buildings on the proposed campus but will avoid the severe traffic, pedestrian safety and noise impacts resulting from inadequate parking proposed for the Expanded Project. This alternative is depicted in Exhibit AA.

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Alternative 2. As an alternative to the site design depicted in Figure 2.1 of the REIR, the City proposes that a portion of the existing Tweedy Boulevard at the eastern end of the site be utilized for student/guest/special event parking. This alternative will in no way disrupt or affect the layout of the buildings on the proposed campus but will avoid the severe traffic, pedestrian safety and noise impacts resulting from inadequate parking proposed for the Expanded Project. This alternative is depicted in Exhibit BB.

Alternative 3. As an alternative to the site design depicted in Figure 2.1 of the REIR, the City proposes that the entirety of the existing Tweedy Boulevard at the eastern end of the site be utilized for student/guest/special event parking. This alternative will in no way disrupt or affect the layout of

Ms. Gwenn Godek
Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
July 10, 2009
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the buildings on the proposed campus but will avoid the severe traffic, pedestrian safety and noise impacts resulting from inadequate parking proposed for the Expanded Project. This alternative is depicted in Exhibit II.

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The EIR should address each and every question and comment from Hartzog & Crabill, Inc., the City's traffic consultant, as set forth in the Memorandum dated July 8, 2009 and attached hereto as Exhibit X; such memorandum is incorporated by this reference and deemed to be a part of the City's comments to the REIR for the Expanded Project.

Procedural Defects

In addition to the above-noted substantive defects in the REIR, LAUSD's circulation and review process for the REIR further suffers numerous procedural defects:

39. On May 28, 2009, this office requested that the revised SRHS #9 EIR be sent directly to this office. Later on May 28, 2009, LAUSD provided a hard copy of the REIR with a date of May 2009 to the City of South Gate Public Works Department (Mohammad Mostahkami) along with a CD containing Appendix A (Air Quality) and Appendix B (Pipeline Safety) thereto ("May REIR"). On May 29, 2009, Gwenn Godek emailed a portion of the May REIR to this office; however, Ms. Godek failed to send sections 3F, 3G, 3H or any of the appendices to this office. Further, as of today, and as shown in Exhibit T, the Recirculated EIR posted on the LAUSD website has a date of June 2009 ("June REIR"). When confronted with these issues, LAUSD asserted that there were "no other changes" to the REIR and that the entirety of the REIR was "available on the website" at all times. However, the REIR was not "available on the website" until after June 8, 2009, more than a week after LAUSD claims to have circulated the REIR. (Exh. W.) LAUSD's circulation of different drafts (ostensibly different due to different dates of May 2009 and June 2009 on the cover page) and failure to provide the entirety of the REIR to this office violates CEQA (after email request and request in Comment Letter).

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40. LAUSD transmitted the REIR via email to this office on May 29, 2009 at 3:47 p.m. Included within LAUSD's email was the "Notice of Availability of a Recirculated Draft Environmental Impact Report in Compliance with Title 14 Section 15082(a), 15103 and 15375 of the California Code of Regulations" ("May Recirculation Notice") as well as the May REIR. The City planned to comment on the REIR within a shortened review period of 30 days, as requested by LAUSD. However, based on the inconsistent deadlines set forth in the May Recirculation Notice, the REIR, and LAUSD emails that did not confirm a date that actually was 30 days after the date of recirculation, the timeframe within which comments would be accepted was unclear at best. (Exh. U.) On behalf of the City, we pointed out to LAUSD that there were five (5) dates among the Notice of Availability, the REIR and emails, including June 7, June 14, June 21, June 26, and June 27, 2009. (Exh. U.)

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None of the dates supplied by LAUSD as the deadline for comments to the REIR complied with the mandate that the REIR be available for public review for *at least* 30 days. The REIR was recirculated on May 28, 2009. Government Code section 6800 governs the calculation of statutory deadlines. It states: “The time in which any act provided by law is to be done is computed by excluding the first day, and including the last, unless the last day is a holiday, and then it is also excluded.” Calculated in accordance with Government Code section 6800, the thirtieth day after May 28, 2009 is June 27, 2009. Because its offices are closed on Saturdays, the earliest deadline LAUSD could legally set for the submission of written comments was Monday, June 29, 2009. All of the dates LAUSD cited as the deadline for comments predated June 29, 2009. (Exh. U.)

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LAUSD attempted to cure these noticing errors by circulating a new Notice of Availability on June 9, 2009 (“June Recirculation Notice”). However, that notice purported to set forth a review period from May 28, 2009 – July 13, 2009 – but it was not circulated to the City until June 9, 2009 and was *never* sent to this office. LAUSD has failed to circulate a Notice of Availability regarding the REIR in compliance with CEQA.

41. The June Recirculation Notice further fails to comply with CEQA as follows:

- (a) Guidelines Section 15087(c)(3) requires the lead agency [LAUSD] to include the date, time and place of any scheduled public meetings or hearings to be held by the lead agency on the proposed project when known to the lead agency at the time of notice. From an email to this office from LAUSD and per LAUSD’s statements to representatives of the City prior to the June Recirculation Notice, LAUSD had scheduled a public hearing on the REIR for Tuesday, July 14, 2009. (Exhibit DD.) The Recirculation Notice violates Section 15087(c)(3) for its failure to include the hearing date.
- (b) Guidelines Section 15087(c)(4) requires the June Recirculation Notice to list “the significant environmental effects anticipated as a result of the project, to the extent which such effects are known to the lead agency at the time of the notice.” The notice circulated by LAUSD states “As set forth in the Recirculated Draft EIR, there are no new potentially significant environmental effects as a result of the proposed project.” This statement fails to meet CEQA’s mandate that the notice include “the significant environmental effects anticipated as a result of the project.”
- (c) Guidelines Section 15087(c)(6) requires the June Recirculation Notice to state if the project site is on any lists of sites enumerated under Government Code Section 65962.5, including lists of land designated as hazardous waste property. Although the REIR identifies the numerous

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hazardous materials found in the soil and groundwater at the site, the June Recirculation Notice fails to state whether the site is on any list identified in Government Code Section 65962.5.

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- (d) The June Recirculation Notice fails to accurately describe the project. It states that SRHS #9 will include “athletic fields” when, in fact, it will include lighted football and baseball stadiums, in addition to athletic fields.

Exhibits

The City submits the following exhibits that are attached hereto and incorporated herein by this reference. Each exhibit is deemed to be a part of the City’s comments to the REIR for the Expanded Project.

- A. January 16, 2009 Comment Letter
- B. January 30, 2008 “Scoping for Traffic Study”
- C. February 25, 2008 “Scoping for Traffic Study”
- D. March 10, 2008 Meeting Minutes
- E. April 10, 2008 Letter from Robert Dickey to Robin Brown
- F. April 23, 2008 Memorandum from KOA Corporation to Robert Dickey
- G. May 19, 2008 Letter from Robert Dickey to Robin Brown
- H. LAUSD School Profile: Bell High School
- I. Excerpts of the EIR for South East High School
- J. LAUSD School Profile: South East High School
- K. Excerpts of the EIR for Santee Education Complex
- L. LAUSD School Profile: Santee Education Complex
- M. Photographs of SRHS #9 area
- N. Photographs of students at South East High School

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- O. Photographs of cars parking and double parking at ISLC
- P. South Gate Police Department Memorandum
- Q. Emails between Dr. Guillermina Jauregui and Mohammad Mostahkami
- R. LAUSD School Profile: South Gate High School
- S. LAUSD School Profile: Huntington Park High School
- T. June REIR Cover Page and May REIR Cover Page
- U. Emails between Gwenn Godek and Celeste Brady (without attachments)
- V. May Notice of Availability of REIR
- W. June 8, 2009 email showing REIR is not yet online
- X. Memo dated July 8, 2009 from Hartzog & Crabill
- Y. LAUSD School Profile: ISLC
- Z. Screen shot of LAUSD website showing only two (2) appendices available online
- AA. Alternative 1
- BB. Alternative 2
- CC. October 8, 2008 letter from Robert Dickey to Robin Brown (with exhibits)
- DD. LAUSD Wrought Iron Gate Rendering
- EE. June Notice of Availability of REIR
- FF. Bus Stop Map
- GG. Emails from Brian Marchetti to Art Cervantes dated February 25, 2008 and March 19, 2008
- HH. March 19, 2008 "Scoping for Traffic Study"
- II. Alternative 3



D-73
cont.

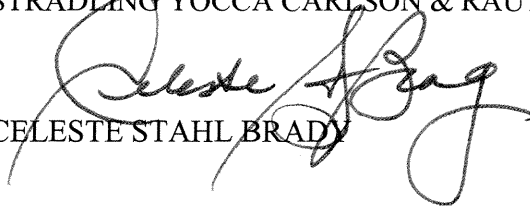
Ms. Gwenn Godek
Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
July 10, 2009
Page 31

As this letter describes in numerous contexts, LAUSD's cavalier attitude towards the impacts of the Expanded Project and unwillingness to compromise or mitigate these impacts constitute evidence that LAUSD's preparation and consideration of the REIR is merely a sham and that LAUSD has, in fact, already determined to move forward with the Expanded Project regardless of its impacts on the community and the environment.

We thank you for the opportunity to provide comments to the REIR and hope you will consider the City's concerns in good faith prior to certifying the REIR for the Expanded Project or taking additional steps to pursue implementation of the Expanded Project. If you have questions, please contact Robert Dickey, Director of Public Works or LAUSD counsel may contact the undersigned.

Respectfully submitted,

STRADLING YOCCA CARLSON & RAUTH



CELESTE STAHL BRADY

↑
D-73
cont.

cc: Ronald Bates, PhD, City Manager
Robert T. Dickey, Director of Public Works
Steve Lefever, Director of Community Development
Paul Adams, Director of Parks and Recreation
Mohammad Mostahkami, City Engineer
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W. Roderick Hamilton, Regional Development Manager, LAUSD
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Jay Golida, Esq., District Counsel
Patrick Perry, Esq., Allen, Matkins, *et al*
(all copies transmitted via email)

RESPONSE TO SUBMITTAL D – STRADLING YOCCA CARLSON & RAUTH**JUNE 10, 2009*****Response to Comment D-1:***

The Project Description for LAUSD South Region High School No. 9 (SRHS No. 9 or Proposed Project, State Clearinghouse [SCH] No. 2008041065) is not “materially different” when comparing the components included in the April 2008 Initial Study/NOP, December 2008 DEIR, and May 2009 Recirculated DEIR, as the commenter suggests. CEQA defines “substantial changes” as “circumstances under which the project is being undertaken which will require major revisions of the EIR or Negative Declaration due to involvement of new significant environmental effects or a substantial increase in severity of previously identified significant effects” (Title 14, California Code of Regulations Sections 15162 and 15164). As described in the May 2009 Recirculated EIR, the inclusion of playfields to enhance the amenities proposed for SRHS No. 9 does not meet the criteria, and therefore would not result in new significant environmental effects or a substantial increase in severity of previously identified significant effects.

Commenter cites *County of Inyo v. City of Los Angeles* 71 Cal. App. 3d 185, 199 (1977) and *Santiago County Water District v. County of Orange* 118 Cal. App. 3d 818, 829 (1981), as supportive arguments. Neither case is applicable to the CEQA process undertaken for the Proposed Project because both cases discuss the adequacy of the Project Description provided in the EIR, whereas the commenter appears to be concerned with issues related to the scoping process for the May 2009 Recirculated DEIR. Unlike the cases cited, the project description in the December 2008 DEIR and May 2009 Recirculated DEIR consistently represent the components proposed. Both the December 2008 DEIR and the May 2009 Recirculated DEIR describe the proposed project as a 145,000 square feet (s.f.) high school structure with classrooms to accommodate 1,431 students. The locale, purpose, and capacity of the buildings proposed are consistently described in the December 2008 DEIR and May 2009 Recirculated DEIR to accommodate the classrooms, a multipurpose room, music and drama hall, a gymnasium, and an administration building. Additionally, the commenter’s footnote on Page 1 of the comment letter dated July 10, 2009, related to procedural defects concerning the actual date of the May 2009 Recirculated DEIR, has been considered and corrected by LAUSD. The revisions to the May 2009 Recirculated DEIR are summarized in Chapter 9 of this August 2009 Final EIR.

The commenter is correct that LAUSD commenced CEQA review, held a scoping meeting, consulted with agencies, and prepared an Initial Study/NOP (April 2008) for a proposed 16.4-acre project site. The May 2009 Recirculated DEIR analyzed the new playfields proposed to the south of the main campus, increasing the Proposed Project acreage to approximately 34 acres. The commenter is not correct in stating that public notice per *CEQA Guidelines* Section 15082(a) is required for the May 2009 Recirculated DEIR and associated playfields. *CEQA Guidelines* Section 15082(a) requires circulation of a NOP to notify the public that an EIR is required for a

project, not when a previously circulated Draft EIR will be revised to analyze new project elements. Even so, commenting agencies were notified by LAUSD's CEQA Consultant of the forthcoming May 2009 Recirculated DEIR prior to circulation, as provided below:

Agency	Contact Person and Telephone Number	Notification Date of Recirculated DEIR
California Department of Transportation 100 Main Street, Los Angeles, CA	Elmer Alvarez (213) 897-6696	May 14, 2009
California Dept. of Education School Facilities Planning Division 660 J Street, Suite 350 Sacramento, CA 95814	Michael O'Neill (916) 322-1463	May 18, 2007
Los Angeles County Public Works Flood Control Irrigation District 900 S. Fremont Ave. Alhambra, CA 91803	Corey Mayne (626) 458-3524	May 14, 2009
City of South Gate Department of Community Development 8650 California Avenue South Gate, CA 90280	Steve Lefevre (323) 563-9500 ext 566	May 26, 2009
California Air Resource Board El Monte Region (Los Angeles Region) 9480 Telstar Ave. El Monte, CA 91731	Karen (626) 450-6150	May 19, 2009
Department of California Highway Patrol South Los Angeles Division 19700 Hamilton Ave., Torrance 90502	Officer Phillips (310) 516-3355	May 19, 2009
Department of Fish and Game – Southern CA Region 4949 Viewridge Avenue San Diego, CA 92123	Cindy (858) 467-4201	May 19, 2009
Integrated Waste Management Board P.O. Box 4025 Sacramento, CA 95812-4025	Michael Bledsoe (916) 341-6000	May 20, 2009
Native American Heritage Commission 915 Capital Mall, Room 364 Sacramento, CA 95814 Attention: Environmental Review	Heather Forest (916) 808-5008	May 21, 2009
Regional Park Superintendent Dept. of Parks and Recreation 7600 Graham Ave. Los Angeles, CA 90001	Paul Davis (213) 202-2667	May 19, 2009

Agency	Contact Person and Telephone Number	Notification Date of Recirculated DEIR
Public Utilities Commission Los Angeles Office 320 West 4th Street, Ste. 500 Los Angeles, CA 90013	Varouj Jinbachian (213) 576-7000	May 19, 2009
Regional Water Quality Board 3737 Main Street, Ste 500 Riverside, CA 92501	Stephanie Hada 213-576-6600	May 22, 2009
California Resource Agency 1416 Ninth Street, Suite 1311 Sacramento, CA 95814	Steve Oleva (916) 653-5656 Anne Henigan (she is assistant to Steve, sent her email on 5/20/09)	May 20, 2009

CEQA Guidelines 15082(a) were met in the April 2008 Initial Study/NOP as the potential environmental effects of the new playfields are consistent with those analyzed in the previous CEQA documentation. Similarly, the commenter's suggestion that a scoping meeting per *CEQA Guidelines* 15082(c) was required for the May 2009 Recirculated DEIR based on the addition of the new playfields being a 'dramatic' expansion of scope holds no relevance. The inclusion of the playfields does not result in additional or more severe impacts or require associated mitigation measures. The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, it does not increase the number of classrooms, students, vehicle trips, pedestrian trips, hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects previously identified in the December 2008 Draft EIR. The recirculation of the DEIR to include this addition to the proposed amenities provided to the students was not intended to frustrate public information aims, and additional analysis was performed in the May 2009 Recirculated DEIR to meet the intent required by law. The May 2009 Recirculated DEIR did provide a Project Description with sufficient detail as to describe the project being contemplated and provide the focus for the environmental review.

The commenter's statement that "LAUSD is seeking to piecemeal its environmental analysis by proposing playfields on the site of the planned "middle school" is unwarranted. LAUSD's initial plans to construct a middle school on the expanded area have been eliminated due to funding issues. The playfields proposed are, by no means, a way for LAUSD to circumvent CEQA review of the previously planned middle school. The potential impacts from inclusion of the new playfields were considered accurately in the May 2009 Recirculated DEIR, including potential impacts to Traffic and Air Quality. The addition of the proposed playfields does not change the operating capacity of the school, there are no new vehicle trips associated with the inclusion of the playfields and no change in circulation patterns. Therefore the analysis in the Traffic Impact Study (TIS) does not need to be updated. The commenter is incorrect to state that the Air Quality analysis does not include the expanded area (refer to Appendix A of the May 2009 Recirculated DEIR, p.6 of the URBEMIS construction output, which indicates that the analysis of mass grading considered the disturbance of 36 acres). Additionally, the commenter's footnote on p.4 of this comment letter related to the limited inclusion of the May 2009 Recirculated DEIR

appendices is incorrect. CEQA Guidelines Section 15088.5 requires the Lead Agency to recirculate only the chapters or portions that have been modified. The TIS did not require modification to consider potential impacts from the new playfields proposed on the south campus. The TIS, included as Appendix D of the December 2008 DEIR, is representative of typical operations, inclusive of the playfields.

Response to Comment D-2:

The TIS for SRHS No. 9 (included as Appendix D of the December 2008 DEIR and Appendix I of this August 2009 Final EIR) does make the assertion that changes were not requested from the City of South Gate in reference to the submitted Memorandum of Understanding (MOU). The comments received by the City on April 10, 2008 focused on larger site planning issues and not the level of service methodology used in the TIS. Comments by the City of South Gate did not specifically address the study area, trip generation, trip distribution, level of service methodology, and other details of the MOU (scoping document). The description of comments received on the MOU in the TIS, included as Appendix D of the December 2008 DEIR and Appendix I of this August 2009 Final EIR, is accurate. The MOU was created as a good faith effort to document major assumptions of the TIS performed for the Proposed Project. Even though the City was asked to sign the MOU on multiple occasions, a signature from the City is not required and lack thereof does not invalidate the document. Upon the receipt of City comments, the MOU was considered complete, as revised on April 23, 2008, and the TIS moved forward. The City letter of May 19, 2008, issued in response to the April 23rd version of the MOU, focused on roadway width details, site access, and other detailed issues regarding the proposed project site and the related Project Description. The Project Description, as provided in the MOU/scoping document, did not address the adjoining playfields to the south. Even so, the expanded use would result in nominal impacts as compared to the project analyzed in the TIS. LAUSD demonstrated due diligence in communicating the scope of the TIS with the City. In addition, the playfields to be constructed to the south of Tweedy Boulevard would not generate additional peak-hour vehicle trips.

Response to Comment D-3:

As depicted in the Proposed Conceptual Site Plan, Figure 2-1 on page 2-4 of the May 2009 Recirculated DEIR, a combined football and soccer field, combined baseball and softball field, basketball courts and tennis courts are planned for the portion of the site that's east of the main campus; while turf playfields and hardcourts are proposed for the southern portion of the site. The Project Description, pages 2-2 and 2-3 of the May 2009 Recirculated DEIR, clearly states that playfields would be located to the east and south of the main campus for soccer, football, softball, and baseball activities. In addition, the Project Description (p.2-3) states that the fields located to the east would include nighttime security lighting, designed in accordance with LAUSD design guidelines. The Project Description (p.2-3) also correctly describes the playfields proposed on the south side of the campus as not using nighttime lighting by stating, "Security and nighttime lighting would not be provided for the playfields to the south of the main school campus." The commenter is confusing the intent of the playfields proposed to the east of the main campus (nighttime lighting proposed) with the playfields proposed to the south (no nighttime

lighting proposed). The purpose of each playfield is therefore clearly identified in the May 2009 Recirculated DEIR, including which playfields would be lighted and suitable for use during evening events.

In regards to the commenter's comment related to parking for evening events, in addition to the proposed 133 space faculty/staff parking available, the proposed project would provide an additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The project will result in the removal of 26 existing spaces of street parking at that portion of the site, resulting in 144 net new parking spaces on the streets. As provided in the TIS, the proposed project would more than adequately serve the parking needs for special events. The access roads proposed for improvement would be designed wide enough to accommodate travel lanes and parking on both sides of the street. The proposed access roadway would contain adequate width to provide for two wide travel lanes for auto/truck travel and on-street parking. Therefore, the conclusions of the parking study of the TIS are conservative and the available parking would likely be higher than that documented within that study. LAUSD will not be required to develop and commit to contingency plans to efficiently and safely circulate and park the patrons arriving and departing special events as significant impacts would not occur. The CEQA documentation adequately analyzes the environmental effects of the new playfields proposed to the south of the main campus on noise, air quality, parking, traffic and/or pedestrian safety, and impacts are similar to those analyzed for the fields east of the main campus.

Unlike the other sections of the May 2009 Recirculated DEIR, including the Project Description, the Noise section did use the term "stadiums" as a descriptor. To clarify the purpose of the fields proposed, the Noise section of the May 2009 Recirculated DEIR, pp. 3E-14, and 3E-15 has been revised as provided below to be consistent with the Project Description.

3E Noise, p. 3E-14 is revised as follows:

Non-vehicular operational activities associated with the proposed project that would generate noise include student activity on-site (especially within the football and baseball ~~stadiums~~fields), bells, and alarms. These sources would be limited to school hours. The sports fields ~~football and baseball stadiums, as well as basketball courts~~, would be located on the eastern and southern portion of the proposed project site.

3E Noise, p. 3E-16 is revised as follows:

Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA L_{eq} at 50 feet.¹ Noise generated by activity in the football and baseball ~~stadiums~~fields would be audible to residences along Wood Avenue and Aldrich

The revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this FEIR.

¹ LAUSD, OEHS, *New School Construction Program, Final PEIR (incorporates the New School Construction Program, DEIR)*, published May 2004, Board Certified June 8, 2004. p. 3.3-8.

Response to Comment D-4:

The Air Quality analysis documented in the December 2008 Draft EIR was updated to incorporate the playfields as required by the revised Project Description in the May 2009 Recirculated DEIR. The maps provided on pages 50-54 of Appendix A of the May 2009 Recirculated DEIR, did not reflect the incorporation of the playfields and, therefore, have been updated in Appendix C of this August 2009 Final EIR. Potential impacts to Air Quality analyzed for the Proposed Project and summarized in Section 3B and Appendix A of the May 2009 Recirculated DEIR provide an accurate representation of potential air quality impacts.

Response to Comment D-5:

The methodology used in the May 2009 Recirculated DEIR to evaluate the long-term project operational emissions from mobile sources conservatively used the URBEMIS2007 default trip length assumption of 9.26 miles/trip and not the .25 miles/trip as indicated in the air quality section (May 2009 Recirculated DEIR, p. 3B-21). This value adequately depicts regional emissions from long-term operational emissions resulting from mobile sources related to travel to and from Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the new playfields.

As a result, the May 2009 Recirculated DEIR, p. 3B-21 has been revised as follows:

URBEMIS2007 was also used to compile long-term project operational emissions from mobile sources. In calculating mobile-source emissions, the URBEMIS2007 ~~default~~ trip length assumptions were not changed from the default value of 9.26 mile per trip average, to reflect potential long-term operational emissions resulting from mobile sources related to travel to and from Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the new playfields. ~~a specific vehicle trip length identified by LAUSD.~~ As documented in the PEIR, student vehicles traveling to and from central region elementary schools travel an average of 0.25 mile per trip.²

The revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this August 2009 Final EIR.

Response to Comment D-6:

Note that the addition of playfields south of Tweedy to the Project Description does not change the operational capacity of the project. Therefore, the operational emissions provided in the May 2009 Recirculated DEIR (p. 3B-7) are accurate, as no new daily trips would result from the new playfields proposed to the south of the main campus. The use of the daily trip rate from the TIS performed by KOA in July 2008 is an accurate and representative methodology to determine

² LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*. Published May 2004, Board Certified June 8, 2004. p. 3.1-1.

potential impacts. As such, the trip rate and length used in the operational emissions analysis correctly represents potential impacts from the proposed new playfields.

Response to Comment D-7:

Comment noted. No additional response is required.

Response to Comment D-8:

The statement regarding compliance with “Education Code section 17213, et seq., which section requires that no site development occur prior to removal of existing hazardous materials pursuant to DTSC approval” is not an accurate interpretation of the California Education Code (CEC). Specifically, this section of the CEC requires that occupancy may not occur unless and until corrective measures required under an existing order by another governmental entity (i.e., DTSC) mitigates all hazardous materials to levels that do not constitute an actual or potential endangerment of public health to persons who would attend or be employed at the proposed school.

Section 3D (Hazardous Materials) states that clearance for investigation area (or Operable Unit [OU]) 1 is anticipated from DTSC in October 2009, and final environmental clearance from DTSC is anticipated to take place for OU2 by 2012. Section 3B (Air Quality) provides a target opening date of the school of Fall 2012 (May 2009 Recirculated DEIR, p. 3B-23), which is several months after DTSC final clearance. Remediation of hazardous materials and associated soil removals would occur in concert with construction (e.g., excavation) on portions of the site where soil removals are required. The commenter’s assertion that school operations would occur prior to removal of hazardous materials and prior to DTSC approval is not an accurate assumption; removal of hazardous materials pursuant to DTSC approval is a component of LAUSD’s construction assumptions and associated schedule. The construction timelines provided in Section 3B (Air Quality) and Section 3D (Hazardous Materials) are representative to what is intended for the Proposed Project. LAUSD is aggressively working with DTSC, with a Remedial Investigation/Feasibility Study submittal to DTSC on schedule for fall 2009. DTSC’s concurrence and associated determination would assure the elimination of any risk to the health and safety of students, faculty, employees and other persons.

To further clarify DTSC’s role in this process, the May 2009 Recirculated DEIR, p. 2-12 has been revised as follows:

DTSC’s determination would confirm the elimination of any risk to the health and safety of students, faculty, employees and other persons. The schedule described above would assure this determination would occur before the school facilities could be occupied, and would be consistent with the Initial Study’s determination that the proposed project would not result in a significant hazardous materials impact.

The revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this August 2009 Final EIR.

The schedule described above would assure this determination would occur before the school facilities could be occupied, and would be consistent with the Initial Study's determination that the proposed project would not result in a significant hazardous materials impact.

Response to Comment D-9:

The May 2009 Recirculated DEIR accounts for the effect of the significant hazardous materials existing on the new playfields and their potential impacts. As provided in Response to Comment D-8 above, school operations would not occur prior to removal of the hazardous materials pursuant to DTSC approval; the school is not planned for operations until fall 2012. As a result, potential hazards to high school students or other children and adults playing on the fields in the expansion area would not occur until DTSC clearance is obtained. Potential impacts related to soil and/or groundwater from landscaping, maintenance and watering the turf overlying these contaminated properties and urban runoff from this contaminated property to storm drains, such as runoff from rainfall, irrigation etc., would not occur because remediation will have already occurred. DTSC is providing oversight of LAUSD's remediation activities. LAUSD and DTSC have entered into an environmental oversight agreement to ensure voluntary cleanup and to obtain School Facilities Planning Division (SFPD) approvals.³ Compliance with DTSC requirements will ensure appropriate measures for clean-up are adhered to for the proposed project.

Response to Comment D-10:

As provided by *CEQA Guidelines* Section 15126.4(a), LAUSD considered feasible mitigation measures to avoid or substantially reduce the Proposed Project's significant environmental impacts. As provided in the NOP/Initial Study for SRHS No. 9, p. 16, LAUSD's Construction Best Management Practices include the following:

“LAUSD shall require its construction contractor to comply with all applicable rules and regulations in carrying out the construction of the Proposed Project. The Proposed Project will also comply with LAUSD Construction BMPs, which are established and refined as part of LAUSD's current building efforts”. Under CHPS requirements, LAUSD's construction contractor shall control erosion and the transport of soil and other pollutants off the site during construction. LAUSD's construction contractor shall design and implement a site-specific plan that incorporates the use of BMPs in compliance with the U.S. EPA's National Pollutant Discharge Elimination System (NPDES), obtained from the Los Angeles Regional Water Quality Control Board (LARWQCB). The plan shall include a Storm Water Pollution Prevention Program (SWPPP), to be prepared in accordance with Part 2 of the NPDES Construction General Permit: General Permit for Stormwater Discharges from Construction Activities.’

³ State of California Environmental Protection Agency Department of Toxic Substances Control, School Cleanup Agreement Regarding Proposed Southeast Learning Complex (AKA South Gate Schools), Docket No, HSA-04/05-011, June 2004.

Compliance with the Regional Water Quality Control Board's (RWQCB) SWPPP is a standard LAUSD BMP and a component of LAUSD's approval process. Compliance with such provisions and associated procedures ensure that potential impacts remain less than significant. LAUSD will implement the required controls for minimizing the amount of runoff as required by the RWQCB, including the parking lot, in a manner that meets applicable requirements, including requirements related to submitting a Standard Urban Stormwater Mitigation Plan (SUSMP). The LAUSD has prepared a *Post-Construction Storm Water Management Plan Minimum Control Measures BMP Selection White Paper* (White Paper) to help site design architects and engineers incorporate storm water quality control measures in planning and design of new facilities. It should be concluded that any proposed site planning and design measures will conform to LAUSD standards and the guidance described in the White Paper. The White Paper will be implemented to assist with the selection of appropriate BMPs, which includes treatment levels for various school components, and outlines both minimum treatment requirements and enhanced BMP targets.⁴ The White Paper was submitted to the RWQCB, who took no exception to the contents. CEQA Guidelines Section 15126.4 (a) (3) states, "Mitigation measures are not required for effects which are not found to be significant." Potential impacts would be less than significant, and revisions to the May 2009 Recirculated DEIR are not required.

Response to Comment D-11:

The CEQA documentation analyzes noise impacts of the proposed playfields on the properties abutting the expanded area along Aldrich Road (refer to May 2009 Recirculated DEIR and August 2009 Final EIR Table 3E-9 and 3E-10 on p. 3E-15 and Table 3E-11 on p. 3E-16). As shown in this August 2009 Final EIR, p. 3E-6, a summary of the Community Noise Equivalent Level (CNEL) for properties along Aldrich has been included. In addition, this August 2009 Final EIR at p. 3E-18 provides a discussion of potential roadway noise levels and associated impacts to residences along Aldrich Road. As shown, the calculated CNEL for the analyzed roadway segments is consistent with those previously analyzed (e.g., volumes ranged from 53 to 72 dBA CNEL at a distance of 50 feet). LAUSD has properly evaluated the potential impacts of increased noise from the Proposed Project.

Response to Comment D-12:

The commenter is correct that the May 2009 Recirculated DEIR states operational noise impacts from student activity on-site (especially within the playfields and track field), would be limited to school hours (May 2009 Recirculated DEIR, p.3E-19). In the opinion of the commenter, this seemingly contradicts certain objectives of the Proposed Project (see May 2009 Recirculated DEIR, p. ES-1.), specifically:

"Create schools that are the center of community engagement both during and outside of normal operating hours, and Maintain or increase existing opportunities for after school athletic and extra-curricular activities."

⁴ Geosyntec Consultants, *Post Construction Storm Water Management Plan (PC-SWMP) Minimum Control Measures (BMP Selection White Paper)*. October 2, 2007.

The commenter is confusing the adequacy of the May 2009 Recirculated DEIR by ‘combining’ the intended uses of the playfields proposed to the east of the campus with those proposed to the south. The May 2009 Recirculated DEIR describes the usage of the south campus playfields as limited to daylight hours when nighttime lighting would not be required, and the usage of the playfields to the east of the campus providing nighttime lighting adequate for evening use. Potential impacts to noise (playfields) and aesthetics (e.g. nighttime lighting) are adequately described in the May 2009 Recirculated DEIR (p. ES-3, p. 2-3, p. 3A-1, p. 3E-7, Table 3E-9 and 3E-10 on p. 3E-15, and Table 3E-11 on p. 3E-16). The playfields south of Tweedy Boulevard would be part of the school campus and therefore available for Civic Center permitted uses. However, these uses would be limited to daylight hours, since there is no lighting proposed for these facilities. Additionally, Civic Center uses are restricted to outside of school hours and would not contribute to a cumulative impact, since these uses would not overlap.

The noise section accurately considers noise levels generated from occasional playfield use (refer to Table 3E-11 on page 3E-16 of the May 2009 Recirculated DEIR and this August 2009 FEIR). Operational activities associated with the proposed project that would generate periodic noise also include student activity on-site (especially within the play field and track field) and bells. As noted on Table 3E-11 and in Impact 3E.1, on-site activities, including the occasional use of the playfields, would result in a significant and unavoidable impact.

Response to Comment D-13:

The Project Description, as provided in the MOU/scoping document, adequately and accurately described the high school project. 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 TIS, and the MOU does not require execution by the City as assumed by the commenter. The MOU was created as a good faith effort to document major assumptions of the TIS performed for the proposed project. Even though the City was asked to sign the MOU on multiple occasions, a signature from the City is not required and lack thereof does not invalidate the document or its assumptions. Upon the receipt of City comments, the MOU was considered complete, as revised on April 23, 2008, and the TIS moved forward. The City letter of May 19, 2008, issued in response to the April 23rd version of the MOU, focused on roadway width details, site access, and other detailed issues regarding the proposed project site and the related Project Description, and not the parameters of the TIS. Additionally, the TIS does not require revision to address the use of the proposed playfields as potential impacts analyzed are comparable to those analyzed in the December 2008 DEIR.

Response to Comment D-14:

The proposed school sports programs would not include regular competitive/championship games. The athletic fields do not include the construction of stadium seating for such games. Proposed new sidewalk facilities would be adequate for typical daily operations of a high school facility, based on potential directional routes of pedestrians. The comments received from the City regarding pedestrian access in the April 10, 2008 letter, regarding the MOU/scoping

document submittal, focused on project description details, access roadways, and other site plan details. These concerns were reinforced by the May 19, 2008 letter from the City.

LAUSD has proposed to implement improvements on Tweedy Boulevard, between Atlantic Avenue on the west and the project site on the east, which would provide an upgraded roadway profile, curb, and gutter, two striped travel lanes, on street parking along the south side of the roadway, and a pedestrian sidewalk on the north side of the roadway. These improvements require cooperation from the City. Further widening of the roadway that has been requested by the City, due to a General Plan designated roadway width of 80 feet, was determined to be infeasible due to the configuration of adjacent properties and the need to acquire additional right of way. The new public access roadway for the industrial parcels located south of Tweedy would not conflict with the City's General Plan and/or land use designations and policies because this roadway will be designed to required specifications, such as those related to Local Commercial/Industrial designated street width/depth, design, on-street parking, and sidewalk requirements.

Response to Comment D-15:

The inclusion of the expanded site as a project component is not materially different when comparing pedestrian safety impacts. The inclusion of a playfield to enhance the amenities proposed for SRHS No. 9 would not result in new significant or a substantial increase in pedestrian safety impacts. The pedestrian safety analysis was based on all potential access routes to the project site by pedestrians. The May 2009 Recirculated DEIR provides sufficient analysis of potential impacts and associated mitigation measures, and no further studies are required.

Response to Comment D-16:

The commenter is correct that the May 2009 Recirculated DEIR includes language in the mitigation measures for Pedestrian Safety impacts requiring coordination with the City of South Gate to accomplish certain improvements (May 2009 Recirculated DEIR, pp. 3F-8, 3F-11), and LAUSD cannot guarantee commitment by the City. LAUSD will implement every effort to work with the City to ensure that coordination with the City is implemented. As coordination from the City cannot be guaranteed, the May 2009 Recirculated DEIR correctly indicates potential significant and unavoidable impacts.

Response to Comment D-17:

The text of the May 2009 Recirculated DEIR at p. 3F-1 has been revised as follows:

The following streets act as boundaries to the Proposed Project site: Wood Avenue, Aldrich Road, and Atlantic Avenue. Wood Avenue is a two-lane roadway, and Atlantic Avenue and Tweedy Boulevard are four-lane roadways. Wood Avenue and Aldrich Avenue are a two-lane roadways, and Atlantic Avenue is a four-lane roadway.

These revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this FEIR.

Response to Comment D-18:

The text of the May 2009 Recirculated DEIR at p. 3F-9 clearly states that the pedestrian volume is 49 persons at Adella Avenue and Southern Avenue, and 48 persons at Atlantic Avenue and Wood Avenue.

The traffic analysis analyzed potential unsignalized pedestrian crossing points on likely routes to and from the school. The pedestrian volume figure (Figure 25 within the TIS and Figure 3F-1 on page 3F-3 of the May 2009 Recirculated DEIR) indicates that an estimated 97 pedestrian would travel along Adella Avenue (to the north of the project site) and Southern Avenue within the peak hours. This volume was divided in half for both the analysis of the Adella Avenue/Southern Avenue intersection (as some might cross the street and others might stay on the same side of the street) and the Atlantic Avenue/Wood Avenue intersection (as some might try to cross Atlantic Avenue at that location) and others would use the Southern/Adella corridor and cross Atlantic Avenue at Southern Avenue.

Response to Comment D-19:

CEQA allows for the Recirculated DEIR to be “limited to a few chapters or portions of the EIR” and requires the Lead Agency to only “recirculate the chapters or portions that have been modified” (*CEQA Guidelines* Section 15088.5 (c)). These revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this FEIR. For clarification purposes, the text of the May 2009 Recirculated DEIR at p. 3F-9 has been revised in this August 2009 Final EIR as follows:

See Appendix J for the methodology.

These revisions to the May 2009 Recirculated DEIR are also summarized in Chapter 9 of this August 2009 Final EIR.

Response to Comment D-20:

As provided in the December 2008 DEIR and as remains unchanged in the May 2009 Recirculated DEIR, the pedestrian access analysis included in the TIS assumed that pedestrian crossing in an east-west pattern would be prohibited at the Atlantic Avenue/Wood Avenue intersection. The recommended pedestrian restriction at the Adella Avenue/Southern Avenue intersection would keep pedestrians off the northern roadway shoulder. Travel along the southern sidewalk of Southern Avenue would still be possible, which does not change the pedestrian analysis in any significant way, as the access analysis determined that pedestrians using Southern Avenue could cross Atlantic Avenue safely at the Southern Avenue intersection.

Response to Comment D-21:

As provided in the December 2008 DEIR and as remains unchanged in the May 2009 Recirculated DEIR, in order to provide an analysis of pedestrian safety at uncontrolled intersections on potential pedestrian routes to and from the Proposed Project site, a warrant analysis was conducted at the intersection of Atlantic Avenue/Wood Avenue and the results were included in the TIS. The pedestrian analysis does not recommend signalization of this intersection. The analysis of potential signalization was conducted to determine if such new controls would be warranted. It was determined that signalization was not necessary and that pedestrians should be prohibited at that location to discourage students from taking a quick route across Atlantic Avenue from the northern site access point.

Response to Comment D-22:

As provided in the April 2008 Initial Study, the December 2008 DEIR and as remains unchanged in the May 2009 Recirculated DEIR, the potential impacts of the proposed playfields on police, fire, paramedic, and/or other public safety services were consistently and accurately analyzed (refer to Initial Study pp. 56-57, Recirculated DEIR pp 3G-4 - 3G-7). The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, does not increase the number of classrooms, students, vehicle trips, pedestrian trips, the hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects relating to police, fire, paramedic and/or other safety services that were not previously identified in the December 2008 DEIR. The periodic use of the new playfields proposed for the south campus would have a nominal impact on public services, and impacts would be similar to those considered in the December 2008 DEIR.

Response to Comment D-23:

As provided in the April 2008 Initial Study, the December 2008 DEIR and as remains unchanged in the May 2009 Recirculated DEIR, the potential impacts of the proposed playfields on water and/or sewer infrastructure were consistently and adequately analyzed (refer to Initial Study pp. 36-39). The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, does not increase the number of classrooms, students, vehicle trips, pedestrian trips, the hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects relating to police, fire, paramedic and/or other safety services that were not previously identified in the December 2008 Draft EIR. The periodic use of the playfields would have a nominal impact on water and/or sewer infrastructure and as a result, impacts would be similar to those considered in the December 2008 DEIR.

Response to Comment D-24:

The April 2008 Initial Study, December 2008 DEIR, and May 2009 Recirculated DEIR consistently describe the potential impacts of the new playfields and associated NPDES

compliance requirements. The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, does not increase the number of classrooms, students, vehicle trips, pedestrian trips, the hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects relating to police, fire, paramedic and/or other safety services that were not previously identified in the December 2008 Draft EIR. As discussed in response to comment D-10, the periodic use of the playfields will have a nominal impact on public services / infrastructure and impacts will be similar to those considered in the December 2008 DEIR.

As provided by *CEQA Guidelines* Section 15126.4(a), LAUSD considered feasible mitigation measures to avoid or substantially reduce the Proposed Project's significant environmental impacts. As provided in the April 2008 NOP/Initial Study for SRHS No. 9, p. 16, LAUSD's Construction Best Management Practices include the following:

“LAUSD shall require its construction contractor to comply with all applicable rules and regulations in carrying out the construction of the Proposed Project. The Proposed Project will also comply with LAUSD Construction BMPs, which are established and refined as part of LAUSD's current building efforts”. Under CHPS requirements, LAUSD's construction contractor shall control erosion and the transport of soil and other pollutants off the site during construction. LAUSD's construction contractor shall design and implement a site-specific plan that incorporates the use of BMPs in compliance with the U.S. EPA's National Pollutant Discharge Elimination System (NPDES), obtained from the Los Angeles Regional Water Quality Control Board (LARWQCB). The plan shall include a Storm Water Pollution Prevention Program (SWPPP), to be prepared in accordance with Part 2 of the NPDES Construction General Permit: General Permit for Stormwater Discharges from Construction Activities.’

Compliance with the Regional Water Quality Control Board's (RWQCB) SWPPP is a standard LAUSD BMP and a component of LAUSD's approval process. Compliance with such provisions and associated procedures ensure that potential impacts remain less than significant. LAUSD will implement the required controls for minimizing the amount of runoff as required by the RWQCB, including the parking lot, in a manner that meets applicable requirements, including requirements related to submitting a Standard Urban Stormwater Mitigation Plan (SUSMP). *CEQA Guidelines* Section 15126.4 (a) (3) states, “Mitigation measures are not required for effects which are not found to be significant.” As previously stated, LAUSD has prepared a *Post-Construction Storm Water Management Plan Minimum Control Measures BMP Selection White Paper* (White Paper) to help site design architects and engineers incorporate storm water quality control measures in planning and design of new facilities. It should be concluded that any proposed site planning and design measures will conform to LAUSD standards and the guidance described in the White Paper. The White Paper will be implemented to assist with the selection of appropriate BMPs, which includes of treatment levels for various school components, and outlines both minimum

treatment requirements and enhanced BMP targets.⁵ The White Paper was submitted to the RWQCB, who took no exception to the contents. CEQA Guidelines Section 15126.4 (a) (3) states, “Mitigation measures are not required for effects which are not found to be significant.”

Potential impacts would be less than significant and revisions to the May 2009 Recirculated DEIR are not required.

Response to Comment D-25:

The City of South Gate’s comments regarding the TIS in the October 8, 2008 letter were considered in revisions to the response to comments related to the Proposed Project environmental documentation. Site planning and access issues, and issue of mitigation measures and feasibility, were clarified in the responses to comments issued in the February 2009 Final EIR and are incorporated by reference in this August 2009 Final EIR.

Response to Comment D-26:

National standards for high school facility trip generation are significantly less than one trip per student. In addition, the analysis of vehicle and pedestrian trip generation is based on a peak-hour of activity and some students may travel to and from the school facility outside of this typical peak hour. Many parents will likely provide transportation for multiple students during pick-up/drop-off times, through typical ridesharing activities. The pedestrian trip breakdown for the overall project trip generation analysis is consistent with the Program EIR for the LAUSD school construction program, and has been applied consistently across multiple projects.

Response to Comment D-27:

The estimates of the busing program intensity are based on LAUSD experience with a variety of high school projects. Two small buses would be used to serve special needs students. These buses would be approximately 20 feet in length and would make one round trip each in the morning and one round trip each in the afternoon. Based on the intensity of use and size of the buses, the TIS concluded that any roadway or access impacts would be less than significant. Busing for general home-to-school trips would not be provided under the scope of the Proposed Project. A Program objective, implemented through the Strategic Execution Plan, provides for the elimination of involuntary busing and the return of students to their neighborhood school. LAUSD’s Facilities Master Plan sets forth long-term goals for school facilities, including providing a *neighborhood school* seat for every student (kindergarten through grade 12) in the District, and reducing class sizes to agreed upon limits in all grade levels.

Response to Comment D-28:

Pedestrian access between nearby bus stops on Atlantic Avenue and the school site would be provided via proposed new sidewalk facilities on Tweedy Boulevard. The nearby intersection of

⁵ Geosyntec Consultants, *Post Construction Storm Water Management Plan (PC-SWMP) Minimum Control Measures (BMP Selection White Paper)*. October 2, 2007.

Atlantic Avenue/Tweedy Boulevard is signalized and has striped crosswalks and pedestrian control phases. The school, at its interface with Tweedy Boulevard, would provide adequate sidewalk linkages and pedestrian access routes into the school campus. No special improvements, beyond those planned for the Tweedy Boulevard corridor, would be necessary to accommodate this pedestrian flow. Where improvements are required, LAUSD will implement efforts to coordinate with the City of South Gate. As coordination by the City cannot be guaranteed, the EIR analysis in the December 2008 DEIR, May 2009 Recirculated DEIR, and this August 2009 FEIR consistently conclude impacts to be significant and unavoidable.

The pedestrian access analysis focused on the provision of sidewalk facilities, and the potential need for signalization of unsignalized intersections, along potential pedestrian routes to and from the proposed school facility. There is a direct route to and from the nearest bus stops to the school facility from the intersection of Atlantic Avenue/Tweedy Boulevard. This intersection is controlled by a traffic signal with pedestrian phases that allow safe pedestrian crossing. LAUSD will be improving the existing Tweedy Boulevard roadway with an updated roadway profile and a sidewalk facility along the north side of the roadway. The signalized control at the Atlantic Avenue/Tweedy Boulevard intersection and the proposed sidewalk facility on Tweedy Boulevard provide safe access for pedestrians for travel between the proposed school site and nearby Atlantic Avenue bus stops.

Response to Comment D-29:

The pedestrian safety analysis included in the TIS was based on all potential access routes to the project site by pedestrians. The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, does not increase the number of classrooms, students, vehicle trips, pedestrian trips, the hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects relating to pedestrian safety that were not previously identified in the December 2008 Draft EIR. As a result, the TIS does not require modification to consider potential impacts from the new playfields proposed on the south campus as the analysis is representative of typical operations, inclusive of playfields.

Response to Comment D-30:

The proposed school sports programs would not include regular competitive/championship games. The playfields proposed to the south of the main campus would not provide spectator seating for such games. The TIS accurately considers the occasional uses and associated impacts to traffic and parking occurring as a result of the lighted football and baseball fields to the east of the main campus. Peak hour trips would be nominal and impacts would be less than significant. Evening trip generation rates were derived from a high school classification and taken from ITE Trip Generation. Student rates for the high school use provide total trips for students, staff, visitors, and other trips, including occasional events.

Response to Comment D-31:

The Proposed Project TIS identified significant traffic impacts that were specific to the intersection of Atlantic Avenue/Tweedy Boulevard, among other study intersections. Significant impacts at this intersection are caused specifically by signal control constraints at the intersection location and progression of traffic flow within the Atlantic Avenue corridor. Any improvements in signal progression and coordination on Tweedy Boulevard west of Atlantic Boulevard would not likely reduce impacts at the Atlantic Avenue intersection. Signal coordination would need to be established that would maintain eastbound traffic flows at other intersections to the west, (including Rosewood Avenue), to provide any significant improvements at the Atlantic Avenue/Tweedy Boulevard intersection. The intersection Rosewood and Tweedy was not identified in the scoping document as an intersection for analysis and therefore would not be considered for any improvements. Such measures, however, could potentially create localized queuing impacts that would create new significant impacts.

Response to Comment D-32:

As described in previous responses to comments, the southern access point to the school site (onto Aldrich Road) would be configured for pedestrian access only. Vehicle trips generated by the Proposed Project would not use Aldrich Road as an access route to and from the school site. Therefore, traffic impact analysis for Aldrich Road in the vicinity of the southern boundary of the school site is unnecessary.

Response to Comment D-33:

The assertion that parking has not been analyzed as part of the CEQA process is not supported by adequate argument or associated technical data. LAUSD adequately studied parking impacts of the playfields, and no increased demand on parking would occur as compared to the Original Project (May 2009 Recirculated DEIR pp. 3H-25 - 3H-26). LAUSD typically provides on-site parking during special events, and the same would be true at SRHS 9. In addition to the proposed 133 space faculty/staff parking available, the proposed project would provide an additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The project will result in the removal of 26 existing spaces of street parking at that portion of the site along Adella Avenue, resulting in 144 net new parking spaces. As provided in the TIS, the proposed project would more than adequately serve the parking needs for special events. The access roads proposed for improvement would be designed wide enough to accommodate travel lanes and parking on both sides of the street. The proposed access roadway would contain adequate width to provide for two wide travel lanes for auto/truck travel and on-street parking. Therefore, the conclusions of the parking study of the TIS are conservative and the available parking would likely be higher than that documented within that study.

Response to Comment D-34:

The project will result in the removal of 26 existing spaces of street parking included in the TIS parking survey, at the portion of the site located south of Tweedy Boulevard. Even so, the

proposed project will create the potential for 170 new spaces with the access roads proposed for construction, resulting in 144 net new parking spaces. The access roads proposed for improvement would be designed wide enough to accommodate travel lanes and parking on both sides of the street. The proposed access roadway would contain adequate width to provide for two wide travel lanes for auto/truck travel and on-street parking. Therefore, the conclusions of the parking study are conservative and the available parking would likely be higher than that documented within that study.

Response to Comment D-35:

The proposed school sports programs would not include regular competitive/championship games. The athletic fields do not include the construction of stadium seating for such games. The 133-space faculty/staff parking lot will be available for after-hours activities, and the proposed project will result in a net increase of 144 spaces that will be available to accommodate parking for occasional evening activities.

Response to Comment D-36:

A procedure included in the TIS parking analysis entailed contacting the principal at Bell High School to determine the current enrollment numbers at that facility. This is consistent with parking demand criteria used District-wide and based on the Program EIR.

Response to Comment D-37:

The analyzed supply and parking availability for the project parking analysis was based on a defined study area of a one-quarter mile radius from the approximate center of the school site and incorporated trash day restrictions into the analysis. All potential available parking supply would fall within this radius. The 144 net parking spaces as a result of the proposed project would ensure ample parking is available during street sweeping activities.

Response to Comment D-38:

[The commenter's suggestion that the May 2009 Recirculated DEIR and supporting studies discuss the effects of likely overcrowding at SRHS #9 in future years is not warranted. An objective of the proposed project is to relieve overcrowding at Bell, Huntington Park, South East, and South Gate High Schools by providing educational facilities for grades nine through twelve. In addition, analyzing potential impacts based on the commenter's notion that "it is more than likely that SRHS #9 will become overcrowded" is speculative and cannot be effectively quantified. LAUSD has not failed to study the capacity of its facilities, as this is the primary goal of the new school program.

Response to Comment D-39:

The analysis of cumulative impacts is adequate, as CEQA requires the analysis to represent the existing conditions at the time of the Initial Study/NOP. CEQA Guidelines Section 15064.7(a) states:

“An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...”

As a result, the inclusion of 1). Cudahy project on Atlantic, 2). IRS expansion at Southern and Atlantic, and 3). industrial use at Burtis and Southern involving chlorine, would not be required

Response to Comment D-40:

As provided in Response to Comment C-2 in the December 2008 DEIR, LAUSD has proposed to implement improvements on Tweedy Boulevard, between Atlantic Avenue on the west and the project site on the east, that would provide an upgraded roadway profile, curb and gutter, two striped travel lanes, on street parking along the south side of the roadway, and a pedestrian sidewalk on the north side of the roadway. These improvements require cooperation from the City. Providing a four-lane cross-sectional width for Tweedy Boulevard to the east of the Atlantic Avenue corridor would require the purchase and demolition of active business on one or both sides of Tweedy Boulevard. Such actions were considered to be outside the scope of the proposed high school project, hence the determinations made within the TIS and the environmental documentation. A capacity analysis of Tweedy Boulevard east of Atlantic Avenue was conducted as part of the TIS; and the analysis did not identify any operational problems. The operational issues were documented in the TIS (Appendix D of the December 2008 DEIR, pp. 45-46). The need for pedestrian access at other locations to and from the south, other than just Tweedy Boulevard, is particularly pronounced based on the existing configuration of Tweedy Boulevard and the limited right-of-way available within that roadway corridor. If these improvements are not made, the impact will be significant and unavoidable, and the Board of Education would be required to adopt a statement of overriding considerations in conjunction with EIR certification. Further widening of the roadway that has been requested by the City, due to a General Plan designated roadway width of 80 feet, and was determined to be infeasible due to the configuration of adjacent properties.

The traffic analysis provided an analysis of the roadway under future post-project conditions. Based on that analysis, it was found that the two-lane roadway would have adequate peak-hour capacity to carry the traffic volumes that would be present on Tweedy Boulevard in the post-project period. This capacity analysis is summarized on Table 3H-4 and on page 47 of the Traffic Study (Appendix D of the December 2008 Draft EIR). Improvements to Tweedy Boulevard were recommended within the traffic analysis that would remove the potential traffic flow friction caused by the adjacent light industrial businesses. The prohibition of parking on one side of the roadway and the provision of wide travel lanes, at 12 feet each, would mitigate any significant project traffic impacts on this roadway.

The “Expanded Project” which relates to the inclusion of practice playfields to the south of the main campus site, would not create any additional trips as compared to the proposed project. The

school busing program would be specialized and minimal, as summarized in the Project Description; the buses would not pose a significant impact to traffic flow on the Proposed Project site or on adjacent and area roadways. As has been stated throughout this document, the sports programs would not include regular competitive/varsity games, either during the day or in the evening or on weekends.

The CEQA documentation is an unbiased document intended to analyze impacts from the proposed project to the surrounding environs. The CEQA analysis is not developed to portray negotiations between the developer and responding agencies. Regardless, analysis indicates that restrictions in access for the busing program are not necessary. These buses would be approximately 20-feet in length, much shorter than the typical 40-foot or 45-foot length of full-size school buses. Based on this intensity of the busing program (two round trips in the morning and two round trips in the afternoon) and the size of the buses used for the program, the TIS concluded that any roadway or access impacts would be less than significant. Access roads will be designed in a manner to meet required dimensional standards, providing adequate access and pedestrian safety. The comment's notion that the May 2009 Recirculated DEIR must not be certified until this clarification is formally made is not warranted, as significant impacts do not occur.

Response to Comment D-41:

As provided in Response to Comment C-3 in the December 2008 DEIR, the May 2009 Recirculated DEIR analyzes traffic impacts of the proposed project based on a scoping document provided to the City of South Gate. This document defined the study intersection locations, project trip generation and distribution assumptions, and other details. The City did not request that McCallum Avenue be studied within the traffic analysis. Significant impacts from the proposed project would not occur at the intersection of Atlantic Avenue and McCallum Avenue, as McCallum Avenue is a local street and project traffic traveling to and from the north access point of the project site would likely use Wood Avenue (the closest east-west roadway to the north side of the site) and Southern Avenue (the closest collector-type roadway). Intersections of these roadways with Atlantic Avenue were analyzed for significant traffic impacts.

The commenter is not correct in stating that public notice per *CEQA Guidelines* Section 15082(a) is required for the May 2009 Recirculated DEIR and associated playfields. *CEQA Guidelines* 15082(a) requires circulation of a NOP to notify the public that an EIR is required for a project, not when a previously circulated DEIR will be revised to analyze new project elements. Even so, commenting agencies were notified by LAUSD's CEQA Consultant of the forthcoming May 2009 Recirculated DEIR prior to circulation.

Response to Comment D-42:

As provided in Response to Comment C-4 in the DEIR 2008, LAUSD has included a new public access road, as a part of the proposed project, for the two industrial parcels to the south. At the easterly terminus of this new public access road, adjacent to the Los Angeles River, LAUSD will grant an easement to the City to the existing access ramp to the river bicycle trail, if requested by

the City (near the southeast corner of the project site). As a result, access to the regional bicycle facility would be provided, and the inclusion of this information as a mitigation measure in the Recirculated DEIR is not required. In addition, the EIR did not identify any project-related impacts on bicycle facilities, so mitigation is not required.

Response to Comment D-43:

As provided in Response to Comment C-6 in the DEIR 2008, LAUSD will provide appropriate bicycle facility class designations based on roadway design widths designated by the City on Tweedy Boulevard to the east of Atlantic Avenue and along the new public access road. These streets will be clearly designated as "bike streets" or bike facilities by signage. The northern terminus of the new access road would be aligned at a four-way intersection with Tweedy Boulevard and the staff/faculty parking access roadway (north leg of the intersection). This north leg roadway would also provide access for buses under the school busing program, which would consist of shorter (around 20 to 25 feet in length) buses with two round trips in the morning and two round trips in the afternoon.

Response to Comment D-44:

As provided in Response to Comment C-7 in the December 2008 DEIR, the new public access roadways for the industrial parcels would not conflict with the City's General Plan and/or land use designations and policies and the zoning ordinance. In addition, this roadway will be designed to required specifications, such as those related to Local Commercial/Industrial designated street width/depth, design, on-street parking, and sidewalk requirements, as a mitigation measure is not required. The proposed new access roadway would have a 60-foot total width and would include sidewalks. LAUSD has included applicable General Plan specifications as design features of the proposed project, not as mitigation measures.

Response to Comment D-45:

As provided in Response to Comment C-8 in the December 2008 DEIR, Subchapter 3H (Transportation and Traffic) identified roadway segment impact on Adella Avenue to the north of the project site would be caused by vehicle traffic generated by the staff/faculty parking lot and not the minimal bus trips via small buses for special needs students. Therefore, Adella Avenue would be used for bus routing. The busing program proposed for the proposed high school consists of two smaller-size buses, two providing service in the morning at the start of the school day and two providing service in the afternoon at the end of the school day. These buses would be approximately 25-feet in length, much shorter than the typical 40-foot or 45-foot length of full-size school buses. Based on this intensity of the busing program (two round trips in the morning and two round trips in the afternoon) and the size of the buses used for the program, any roadway or access impacts would be less than significant. Restrictions in access for the busing program are not necessary.

Response to Comment D-46:

As provided in Response to Comment C-10 in the December 2008 DEIR, the terminus of Adella Avenue, on the north side of the property, will be a public cul-de-sac, and is incorporated as a design feature. With regard to the fencing at the proposed cul-de-sac at the north side of Adella Avenue, LAUSD will change the CMU wall to a wrought iron fence along the backside of the campus buildings. A CMU wall will be located along the perimeter of the service yard in order to visually screen the trash enclosures and maintenance activities. Significant traffic impacts would not occur due to the proposed service/delivery vehicle access point at the north end of the project campus via the proposed Adella Avenue cul-de-sac. The expected vehicle volumes for utility and delivery functions are expected to be very low and queuing conditions or conflicting overlaps with other traffic flows are not expected. Based on the overall anticipated traffic volumes on Adella Avenue due to the project, the traffic study recommended that a neighborhood traffic management plan be implemented that would assist in routing traffic directly to Southern Avenue and Atlantic Avenue and would potentially assist in traffic calming. The provision of separate access points for general access via Tweedy Boulevard and specialized utility access via Adella Avenue at the north end of the site will help to avoid further significant impacts to the Atlantic Avenue/Tweedy Boulevard intersection. Therefore, Adella Avenue would be used for pedestrian, staff/faculty vehicle, and delivery/utility vehicle access to and from the site via this cul-de-sac.

The concrete wall planned for construction is for the purpose of noise mitigation. The site plan provided in the May 2009 Recirculated DEIR is representative and the specific location of the wrought iron fence will be determined upon plan approval. Analysis of potential for graffiti and similar vandalism to the concrete wall is not within the scope of CEQA.

Response to Comment D-47:

In addition to Response to Comment C-11 in the December 2008 DEIR, the Adella Avenue terminus at the southern boundary of the school site is a very short segment, north of Aldrich Road. The length of the roadway from its intersection with Aldrich Road to the southern boundary of the project site is approximately 115 feet. The roadway segment would not have the typical characteristics of some dead-end roadway segments, where the terminus may not be visible from the last adjacent intersection. The terminus of this roadway is clearly visible from Aldrich Road and a turnaround point via the provision of a cul-de-sac is unnecessary. This existing roadway condition was created by the City, which has installed access barriers across Adella Avenue adjacent to the industrial parcels at the southern boundary of the Proposed Project site. The Proposed Project will not alter the existing configuration of this existing portion of Adella Avenue or the City's placement of barriers. The Adella Avenue terminus would only have a pedestrian access connection, but would not have any vehicle connections associated with the Proposed Project site.

Response to Comment D-48:

In addition to Response to Comment C-12 in the December 2008 DEIR, dispersion of pedestrian access points is the best solution to help avoid significant pedestrian access impacts that would

occur (and would be true of any high school site) with a single access point. Limiting pedestrian access to and from the site to a single-point at Tweedy Boulevard could likely cause more intense impacts in terms of sidewalk capacity limitations and conflicts with adjacent travel lane vehicle flows, whether Tweedy Boulevard is improved to a four-lane roadway or remains as an upgraded two-lane roadway as proposed by the Proposed Project.

Students are expected to live in the residential neighborhoods located north and south of the proposed project site and are expected to access the proposed project by the most direct means, which for pedestrians would be the terminus of Adella Avenue. It is unrealistic to expect students to detour to access the proposed project site only from Tweedy Boulevard. The pedestrian safety study in the TIS did not identify significant pedestrian safety impacts associated with pedestrian access from Adella Avenue.

Response to Comment D-49:

In addition to LAUSD's Response to Comment C-14 in the December 2008 DEIR, "urban" designations for land uses do not only refer to extremely dense urban areas such as San Francisco or New York City. As provided by *CEQA Guidelines* Section 15387, an Urbanized Area is defined as:

".... a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile."

Parking Generation, published by the Institute of Transportation Engineers, provides urban and suburban rates for commonly studied uses in order to differentiate between sites that would be constructed in urban or built-out communities versus those constructed in very automobile-centric suburban areas with low-density, a limiting mixing of land uses, and generally high vehicle speeds on major roadways. South Gate is very much a built-out urban community, is heavily industrialized, borders other urbanized communities, and has limited open space and separation of land uses. Therefore, the urban designation is an appropriate designation for purposes of comparison with the surveyed site for the parking analysis. In addition, the school facility would not contain sports stadiums that would provide seating capacity for competitive sports matched against other area high schools. The typical trip generation of the proposed school facility would therefore be similar to high school facilities on days without major sporting events.

Response to Comment D-50:

Information pertaining to LAUSD's obligation to prepare a parcel map, and verbal agreements thereof, are not within the scope of CEQA Appendix G or LAUSD's CEQA requirements and therefore inclusion of this information is not required in the Revised DEIR.

Response to Comment D-51:

Information pertaining to LAUSD's obligation to pay development fees per Government Code Section 54999, et seq. is not within the scope of CEQA Appendix G or LAUSD's CEQA

requirements and therefore inclusion of this information is not required in the EIR. As provided on p. 62 of the April 2008 Initial Study for SRHS No. 9. LAUSD did perform an assessment of water demand, which would be approximately 21,645 gpd, and concluded that potential impacts are less than significant. Distribution infrastructure is already in place on and around the Project Site, and the water demand is anticipated to be less than when the site was operated prior to LAUSD purchase. The expected increase in water demand as a result of the proposed project would be minimal when compared to the capacity of the water supply facilities serving the proposed project area. LAUSD would comply with local, regional, and state water conservation policies and would follow standard BMPs to reduce water consumption. Additionally, the City of South Gate and LAUSD have negotiated and agreed upon a fee that is acceptable to both parties. Therefore, impacts on water supply would be less than significant and no further study of this issue is required.

Response to Comment D-52:

In support of LAUSD's Response to Comment C-17 in the December 2008 DEIR, there is no question that carbon monoxide (CO) concentrations have declined dramatically in California, including Los Angeles County, due to existing controls and programs, and lower vehicle emissions. According to USEPA ambient CO data (available on-line at <http://www.epa.gov/air/data/monvals.html?co~06037~Los%20Angeles%20Co%2C%20California>), there has not been a CO exceedance for any monitoring station in Los Angeles County in over ten years, including the station closest to the Project area (e.g., Lynwood Station, located at 11220 Long Beach Boulevard, Lynwood, CA). The reductions in CO concentrations are noted in the first paragraph of the Executive Summary of CARB's *2004 Revision to the California State Implementation Plan for Carbon Monoxide Updated Maintenance Plan for Ten Federal Planning Areas* (CARB, 2004), which states:

“The dramatic reduction in CO levels across California is one of the biggest success stories in air pollution control. CARB requirements for cleaner vehicles, equipment and fuels have cut peak CO levels in half since 1980, despite growth. All areas of the State designated as non-attainment for the federal 8-hour CO standard in 1991 now attain the standard, including the Los Angeles urbanized area. Even the Calexico area of Imperial County on the congested Mexican border had no violations of the federal CO standard in 2003. Only the South Coast and Calexico continue to violate the more protective State 8-hour CO standard, with declining levels beginning to approach that standard.”

Response to Comment D-53:

LAUSD's Response to Comment C-18 in the December 2008 DEIR provides adequate detail of the remediation plan, schedule, and methods for protecting public safety and health and welfare. Nevertheless, consistent with the Education Code and CEQA, the District has again described in detail in the Program EIR and Initial Study the process it has followed and the specific performance criteria it will satisfy in investigating, assessing and remediating the project site's environmental conditions. That process, and the specific performance criteria governing it, are summarized as follows:

- Before it can acquire a potential school site, the District must prepare a Phase I environmental site assessment (“Phase I ESA”) of it.⁶
- If the information disclosed by the Phase I ESA indicates that a preliminary environmental assessment (“PEA”) should be prepared, the DTSC would require the District to prepare one and to enter into an agreement with the DTSC to oversee the PEA’s preparation.⁷
- The District would submit the PEA for the DTSC’s review and approval, and publish a notice about the PEA’s preparation and availability for public review and comment.⁸
- If the DTSC determines that the PEA demonstrates that either a further investigation or a removal action is needed, the District may elect either not to proceed with the project, or undertake the investigation or remediation under the DTSC’s oversight, and in accordance with its cleanup standards.⁹
- As the lead agency, DTSC would undertake its own CEQA review process, which would have to be completed prior to implementation of any removal action proposed for the site.
- The District cannot begin construction of the school nor occupy any of its buildings until the DTSC makes certain findings and approvals in accordance with DTSC’s criteria (e.g., the site’s conditions will not significantly threaten the health and safety of workers, students and adults).¹⁰

In circumstances such as these where practical considerations preclude devising specific measures to mitigate at the planning stage, CEQA allows a lead agency, such as the District, to commit itself to devise measures that will satisfy performance criteria at the time of project approval.¹¹ That is precisely what the District has committed to do here when it bound itself to do each of the following by the terms of the Program EIR it previously certified, the Initial Study and the school cleanup agreement:¹²

- For all projects receiving state funding, such as the proposed project, the District will prepare a Phase I ESA and submit it to the DTSC for its review and approval.¹³
- If the Phase I ESA warrants it, the District will prepare a PEA and submit it to the DTSC.¹⁴
- If the PEA suggests it and the District decides to proceed with the project, the District will prepare a removal action workplan (“RAW”) and submit it to the DTSC for review and approval.¹⁵

⁶ Education Code Section 17213.1(a).

⁷ Education Code Section 17213(a)(4)(B).

⁸ Education Code Section 17213.1(a)(5) and (6).

⁹ Education Code Section 17213.2(a).

¹⁰ Education Code Section 17213.2(d).

¹¹ *Sacramento Old City Ass’n v. City Council*, 229 Cal. App.3d 1011, 1028-29 (1991); CEQA Guideline 15126.4.

¹² State of California Environmental Protection Agency Department of Toxic Substances Control, School Cleanup Agreement Regarding Proposed Southeast Learning Complex (AKA South Gate Schools), Docket No, HSA-04/05-011, June 2004.

¹³ Program EIR, page 3.8-14; Initial Study, page 49.

¹⁴ Ibid.

¹⁵ Program EIR, pages 3.8-14-15; Initial Study, page 49.

- The District will perform the removal action, as approved by the DTSC, consistent with the DTSC’s cleanup standards and other performance criteria and under this agency’s oversight.¹⁶
- The District will not begin construction nor occupy any school buildings until first obtaining the DTSC’s review and approval based on specific, objective statutory findings that agency must make (*e.g.*, the site’s conditions will not significantly threaten the health and safety of workers, students and adults).¹⁷

The District has, in fact, already completed several measures it has committed itself for the SRHS No. 9 project site, and is required to undertake, including the Phase I ESA, which identifies various recognized environmental conditions (RECs), and recommends the preparation of a Preliminary Environmental Assessment (PEA), which would further evaluate these RECs. The PEA Equivalent Report for the entire 32-acre site was approved by the DTSC on March 21, 2005. A subsequent Remedial Action Plan (RAP) was approved for the SRHS No. 9 site on December 11, 2008 and remediation is underway. The District will implement the RAP, including all required removal steps, under the DTSC’s oversight, until it receives that agency’s “no further action” determination. Compliance with DTSC requirements will ensure appropriate measures for clean up are adhered to for the proposed project.

Response to Comment D-54:

The PSHA presented an adequate analysis and the risks are considered less than significant (see Appendix F of this August 2009 Final EIR). The report meets the requirements of CCR Title 5 Sections 14010 (d) and (h) to evaluate California Department of Education’s (CDE)’s policy on pipelines. The analysis identifies all natural gas and hazardous liquid pipelines located within 1,500 feet of proposed or existing school sites, and identifies all natural gas and hazardous liquid pipelines crossing or located within railroad track easements that lie within 1,500 feet of proposed or existing school sites. A quantitative risk analyses to predict student and staff exposure and fatality risk was performed. Adequate methodology was implemented and no significant risks were identified.

Response to Comment D-55:

The PSHA identifies all known aboveground and underground natural gas and hazardous liquid pipelines located within 1,500 feet of proposed or existing school sites, and identifies all natural gas and hazardous liquid pipelines crossing or located within railroad track easements that lie within 1,500 feet of proposed or existing school sites (see Appendix F of this August 2009 Final EIR). The commenter’s suggestion that implementing DTSC oversight and appropriate provisional requirements during tank removal is not accurate.

¹⁶ Program EIR, page 3.8-15; Initial Study, page 49.

¹⁷ Ibid.

Response to Comment D-56:

The commenter is correct in that SRHS No. 9 would have a significant and unavoidable impact related to operational noise. A sound wall is proposed to protect the nearby residential neighborhood from noise generated at the eastern campus athletic fields and the south campus playfields (refer to May 2009 Recirculated DEIR Table 3E-11, Athletic Area Noise Levels) on p. 3E-16. The sound wall would not help mitigate noise impacts resulting from the use of adjacent residential neighborhood streets to less than significant levels. As stated in the December 2008 DEIR and as remains unchanged in the May 2009 Recirculated DEIR, operational noise impacts would remain significant and unavoidable.

Response to Comment D-57:

As provided in Response to Comment No. D-22, the CEQA documentation adequately analyzes the potential impacts of the proposed playfields on police, fire, paramedic, and/or other public safety services (refer to April 2008 Initial Study pp. 56-57, May 2009 Recirculated DEIR pp 3G-4 - 3G-7). The periodic use of the new playfields proposed for the south campus would have a nominal impact on public services and impacts would be similar to those considered in the December 2008 DEIR. The analysis concluded that potential impacts would be less than significant. LAUSD's statement that police resources would be provided by LAUSD, trained specifically for this education facility, and that the City of South Gate Police Department "would be the secondary provider of law enforcement services" for SRHS No. 9 is true. The May 2009 Recirculated DEIR does indicate that the City of South Gate Police Department would not be impacted, but instead, as stated in the April 2008 Initial Study/NOP; potential impacts would be "Less Than Significant." As included in the May 2009 Recirculated DEIR, public resources and other City services have the potential to be impacted by the Proposed Project, such as fire protection resources and associated response times. Even so, LAUSD has implemented project design features to ensure potential impacts remain less than significant for these resources.

LAUSD did perform an assessment of water demand, which would be approximately 21,645 gpd, and concluded that potential impacts are less than significant. Distribution infrastructure is already in place on and around the Project Site, and the water demand is anticipated to be less than when the site was operated prior to LAUSD purchase. The expected increase in water demand as a result of the proposed project would be minimal when compared to the capacity of the water supply facilities serving the proposed project area. LAUSD would comply with local, regional, and state water conservation policies and would follow standard BMPs to reduce water consumption. Therefore, impacts on water supply would be less than significant and no further study of this issue is required.

Analysis of potential impacts to public services is provided on page 56 of the Initial Study, and the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection. Furthermore, as indicated in a letter provided by the LACFD, the overall

increase in demand to the LACFD stations serving the proposed project resulting from the change in on-site population density would result in less than significant impacts to the LACFD.¹⁸ SRHS No. 9's impacts on public services will be less than significant.

Response to Comment D-58:

Given that the purpose of the Program is to provide relief to overcrowded schools and maintain adequate public school facilities, the Program is considered growth accommodating rather than growth inducing. Therefore, the Program as a whole would not create an increase in the population served by each fire protection provider such that the proposed project would directly result in the need for new or expanded fire protection services or facilities. Furthermore, as indicated in a letter provided by the LACFD and included as Appendix I in this August 2009 Final EIR, the overall increase in demand to the LACFD stations serving the proposed project resulting from the change in on-site population density would result in less than significant impacts to the LACFD.¹⁹ As indicated by the LACFD, the proposed project would not require new or expanded fire protection facilities in order to serve the proposed project site.

Response to Comment D-59:

Even though a significant increase in faculty or staff is not anticipated, the proposed project provides ample parking. The proposed project is intended to relieve school overcrowding consistent with the New School Construction program and the Facilities Master Plan, and intended to relieve overcrowding at Bell, Huntington Park, South East, and South Gate High Schools. The proposed project would provide approximately 1,431 two-semester seats for students in grades nine through 12, and would require approximately 125 faculty, staff and volunteers (full- and part-time). Parking facilities would be constructed to meet LAUSD design guidelines of 2.5 spaces per high school classroom.²⁰ The 133-space surface parking lot as well as associated street parking would accommodate the proposed project and additional faculty parking is not warranted.

Response to Comment D-60:

LAUSD certified an EIR in connection with its acquisition of the site in 1991, and the proposed project site was preferred as it is the only option that did not result in issues related to displacement and relocation, or proximity to a chemical plant, which poses a potential for health hazards to future students, which are expressly prohibited according to AB 3205²¹ As a result, the Alternatives chapter of the May 2009 Recirculated DEIR, p. 4-2, has been revised as follows:

¹⁸ County of Los Angeles Fire Department, Station No. 54, response to ESA's letter submitted to Captain John Mancha (Los Angeles County Fire Department Fire Station 54) on to May 27, 2008.

¹⁹ County of Los Angeles Fire Department, Station No. 54, response to ESA's letter submitted to Captain John Mancha (Los Angeles County Fire Department Fire Station 54) on to May 27, 2008.

²⁰ LAUSD, *School Design Guide. Section 2.3 Vehicular Access and Parking (a) Parking Space Requirements*, October 2003.

²¹ Environmental Perspectives, Final Environmental Impact Report, South Gate New Senior High School No. 1 and South Gate New Elementary School No. 3; Prepared for the Los Angeles Unified School District, March 1991.

An analysis of alternative locations for SRHS No. 9 was performed in the CEQA documentation performed for site acquisition. Several alternative scenarios were identified and evaluated in the 1991 EIR, including the "no project" and several alternative locations for the proposed elementary and senior high schools. A generalized assessment of each of the alternatives is provided in the text. The LAUSD established several criteria for site selection, and identified sites, which meet the minimum requirements for planned school facilities (e.g., site size, facility/space requirements, etc.). For the proposed project, the District identified five alternative sites meeting the minimum requirement for the proposed project. The 1991 EIR analysis was based upon the following: 1). minimized displacement of owner-occupied homes and apartments, 2). located in an area to relieve overcrowding at two or more schools, 3). provides adjoining streets.

The proposed project site was preferred as it is the only option that did not result in issues related to displacement and relocation, or proximity to a chemical plant, which poses a potential for health hazards to future students, which are expressly prohibited according to AB 3205. Based on the thorough analysis of the preferred alternative and the assessments of the five alternative site location alternatives; , the preferred alternative (i.e., proposed project) is considered the "environmentally superior" alternative. This is predicated primarily on the fact that each of the alternatives would necessitate higher displacement of residential and/or industrial/commercial development.

This information is also summarized in Section 9.0 of the August 2009 FEIR.

Response to Comment D-61:

The process by which LAUSD will develop various plans for the improvements, planned for constructed in connection with SRHS No. 9, is not within the scope of CEQA Appendix G or LAUSD's CEQA requirements.

Response to Comment D-62:

The process by which LAUSD will negotiate the MOU with the City and various communications thereof, is not within the scope of CEQA Appendix G or LAUSD's CEQA requirements.

**RESPONSE TO SUBMITTAL D (CONTINUED) – STRADLING YOCCA CARLSON &
RAUTH ON BEHALF OF HARTZOG & CRABILL, INC.**

JUNE 10, 2009

Response to Comment D-63:

Impacts due to trash trucks and deliveries were considered in the December 2008 Draft EIR and TIS. Impacts were less than significant. Mitigation is therefore not required.

Response to Comment D-64:

Potential pedestrian impacts resulting from students entering the school from the north entrance on Adella Avenue were analyzed and impacts are less than significant. The potential impacts from pedestrian traffic on local residents would be nominal. LAUSD's intention was not to reject the suggestion to consider “potential inconveniences” but rather to suggest that this is not quantifiable nor is this topic covered under Appendix G of CEQA or LAUSD’s CEQA requirements. The commenter is incorrect to suggest that the CEQA analysis did not consider noise impacts resulting from traffic and pedestrian safety impacts. Such impacts have been studied and adequately addressed in the May 2009 Recirculated DEIR, and mitigation has been assigned as applicable.

Response to Comment D-65:

Restrictions in access for the busing program are not necessary as the busing activities would not result in a significant impact. As a result, it is not necessary for all school buses to access the South campus playfields from Tweedy Boulevard. The proposed bus routes from pick-up and drop off would not result in significant traffic, pedestrian safety, and noise impacts to the adjacent residential neighborhood. In addition, significant traffic, pedestrian safety, and noise impacts would not occur or be compounded from trash, delivery, utility, and maintenance vehicles accessing SRHS #9. All entrance streets will be designed in accordance to applicable standards.

The CEQA documentation is an unbiased document intended to analyze impacts from the proposed project to the surrounding environs. The CEQA analysis is not developed to portray negotiations between the developer and responding agencies. Regardless, analysis indicates that restrictions in access for the busing program are not necessary. The buses would be approximately 25-feet in length, much shorter than the typical 40-foot or 45-foot length of full-size school buses. Based on this intensity of the busing program (two round trips in the morning and two round trips in the afternoon) and the size of the buses used for the program, any roadway or access impacts would be less than significant. Access roads will be designed in a manner to meet required dimensional standards, providing adequate access and pedestrian safety. The comment’s notion that the May 2009 Recirculated DEIR must not be certified until this clarification is formally made is not warranted as no impacts occur.

Response to Comment D-66:

The commenter's assertion that LAUSD's decision not to analyze potential alternative sites for SRHS #9 is not accurate. An analysis of alternative locations for SRHS No. 9 was performed in the CEQA documentation performed for site acquisition. Several alternative scenarios were identified and evaluated in the 1991 EIR, including the "no project" and several alternative locations for the proposed elementary and senior high schools. A generalized assessment of each of the alternatives is provided in the text. The LAUSD established several criteria for site selection, and identified sites which meet the minimum requirements for planned school facilities (e.g., site size, facility/space requirements, etc.). For the proposed project, the District identified five alternative sites meeting the minimum requirement for the proposed project. The 1991 EIR analysis was based upon the following: 1). minimized displacement of owner-occupied homes and apartments, 2). located in an area to relieve overcrowding at two or more schools, 3). provides adjoining streets.

The proposed project site was preferred as it is the only option that did not result in issues related to displacement and relocation, or proximity to a chemical plant, which poses a potential for health hazards to future students, which are expressly prohibited according to AB 3205. Based on the thorough analysis of the preferred alternative and the assessments of the five alternative site location alternatives; the preferred alternative (i.e., proposed project) is considered the "environmentally superior" alternative. This is predicated primarily on the fact that each of the alternatives will necessitate displacement of residential and/or industrial/commercial development.

LAUSD has committed to street improvements where they are feasible. LAUSD will implement the recommended mitigation measure at the intersection of Atlantic Avenue at Firestone Boulevard. Improvements to the northbound or southbound approaches of the Tweedy Boulevard/Atlantic Avenue intersection, representing potential improvement measures, would be infeasible due to the maximized widths of the intersection curb lanes at these approaches. Widening of the intersection approaches without conducting any widening typically requires reductions in curb lane widths to provide for additional left turn lanes, thru lanes, or right turn lanes. The curb lane widths at these approaches range from approximately 17 feet to 19 feet. Reducing the width of these lanes to provide additional approach lanes would render the remaining lane widths as substandard. Therefore, widening would be necessary to implement physical capacity improvements.

The existing roadway width at the south leg (northbound approach) of the Atlantic Avenue/Tweedy Boulevard intersection would not support an additional northbound left turn lane without widening of the intersection. The curb lane of the receiving lanes at the south leg is approximately 18 feet in width and has an existing bus stop pad. This lane could not be reduced by a lane width (approximately 10 feet) and still have enough width for both the bus stop and thru traffic flows. The southbound approach curb lane has similar width constraints, and could not accommodate a relocated southbound bus stop without roadway widening.

The May 2009 Recirculated DEIR states LAUSD's assumptions related to traffic mitigation in the TIS. LAUSD cannot implement the dual northbound left-turn lanes, as the property is not owned by the District. LAUSD will work with the City during the plan approval process to ensure that improvements to Adella Avenue are designed to allow for adequate access for trash, delivery and maintenance vehicles approaching the South campus playfields. The primary purpose of the plan approval process is to establish and implement reasonable standards to ensure that, pursuant to the City's general plan, all necessary street dedications are made and all required street improvements are constructed or adequately provided for prior to the issuance of building permits for new buildings and structures and prior to their use and occupancy. LAUSD acknowledges the comment that fair-share contributions for improvements to the intersection at Tweedy Boulevard and Atlantic Avenue are recommended. The process of which LAUSD will negotiate improvements in connection with SRHS No. 9 is not within the scope of CEQA Appendix G or LAUSD's CEQA requirements.

Response to Comment D-67:

The Commenter's suggested alternatives, intended to address traffic, pedestrian safety, noise and air quality impacts that will be generated by SRHS #9, do not meet the intent of *CEQA Guidelines* Section 15126.6 which provides direction for the discussion of alternatives to the proposed project.

The commenter's suggested Alternatives 1, 2, and 3 are for the purpose of providing student/guest/special event parking. The proposed project does not result in a significant impact as a result of student/guest/special event parking. As a result, this suggested alternative does not meet the intent of CEQA which provides a setting forth of alternatives that:

“...shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” [15126.6(f)]. In addition, CEQA requires “...a range of reasonable alternatives to the project, or to the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” [15126.6(a)]

As none of the alternatives would substantially lessen any of the significant effects of the project, consideration for inclusion in the CEQA analysis is not warranted. LAUSD has responded to the commenter's suggestion that the EIR address each and every question and comment from Hartzog & Crabill, Inc., the City's traffic consultant, as set forth in the Memorandum dated July 8, 2009 in this August 2009 Final EIR (refer to “Response to Comment Submittal E).

Response to Comment D-68:

According to administrative records, including Federal Express receipts, on May 31, 2009, three hard copies of LAUSD's May 2009 Recirculated DEIR for SRHS No. 9 were mailed to City of

South Gate Public Works Department (Mohammad Mostahkami) along with a CD containing Appendix A (Air Quality) and Appendix B (Pipeline Safety). The May 2009 Recirculated DEIR was posted on LAUSD's website, for a 45-day circulation period (e.g. May 28 – July 13, 1009). All notices issued by LAUSD include telephone numbers for the public to obtain additional information, such as May 2009 Recirculated DEIR repositories or confirmed circulation dates. As a result, LAUSD circulated the documentation in a manner consistent with *CEQA Guidelines* Section 15087. The NOA was 1). posted in the office of the County Clerk, 2). mailed to person(s) who filed a written request for notification with the lead agency, 3). posted in the public newspaper serving the project area, 3). posted at the OPR, and 4). mailed to residences and businesses within a 500 foot radius of the project site.

Response to Comment D-69:

LAUSD respects the commenter's concern related to various deadlines set forth in the May 2009 Recirculation Notice, the May 2009 Recirculated DEIR, and LAUSD emails. LAUSD ultimately withdrew the request made to the Office of Planning and Research for a 30-day public review. The timeframe within which LAUSD accepted comments, per CEQA, was 45 days after submittal and acceptance by the SCH (e.g., May 28, 2009).

Response to Comment D-70:

CEQA Guidelines Section 15087(c)(3) requires LAUSD to include the date, time and place of any scheduled public meetings or hearings to be held by the lead agency on the Proposed Project when known to the lead agency at the time of notice. Even though e-mail correspondence from LAUSD to the commenter, which demonstrates further attempts by LAUSD to provide Notice and outreach, suggests a possible public hearing date, this date was not confirmed or publically advertised. The May 2009 Recirculation Notice would therefore not violate Section 15087(c)(3) for its failure to include the hearing date, as inclusion of such dates prior to confirmation is not required.

Response to Comment D-71:

The commenter is correct in that CEQA Guidelines Section 15087(c)(4) requires the Notice to list "the significant environmental effects anticipated as a result of the project, to the extent which such effects are known to the lead agency at the time of the notice." This does not result in revisions or recirculation per to CEQA Section 21092.1 and CEQA Guidelines Section 15088.5.

Response to Comment D-72:

The commenter is correct that CEQA Guidelines Section 15087(c)(6) requires the Notice to state if the project site is on any lists of sites enumerated under Government Code Section 65962.5, including lists of land designated as hazardous waste property. The May 2009 Notice of Availability for SRHS No. 9 did fail to state whether the site is on a list identified in Government Code Section 65962.5. This oversight does not result in revisions or recirculation per CEQA Section 21092.1 and CEQA Guidelines Section 15088.5.

Response to Comment D-73:

The public notices (NOA and NOC) and associated May 2009 Recirculated DEIR (pp ES-3, pp. 2-2 – 2-5) provide an accurate description of project components for SRHS No. 9. CEQA provides for the Project Description to be a “defining element” or “starting point” for environmental documents, with a brief summary of the Proposed Project and its consequences in sufficient detail to describe the project being contemplated and provide the focus for the environmental review. Most importantly, the term "project" means the whole of the action which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. It does not mean each separate governmental approval. The commenter’s concern that the NOC describes "athletic fields" as a project component versus “lighted football and baseball stadiums” in addition to “athletic fields” is not warranted because lighted football and baseball stadiums south of Tweedy are not proposed as part of the project.



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July 8, 2009

Mr. Mohammad Mostahkami, P.E.
City Engineer
City of South Gate
8650 California Avenue
South Gate, CA 90280

**Subject: Review Comments to the Pedestrian and Traffic Sections of
the Recirculated Draft Environmental Impact Report South
Region High School No. 9**

Dear Mr. Mostahkami:

As requested by the City of South Gate, Hartzog & Crabill, Inc. (HCI) has completed our review of the pedestrian and traffic sections of the *Recirculated Draft Environmental Impact Report South Region High School No. 9* (Recirculated DEIR) prepared by Environmental Science Associates (ESA) dated May 2009. The pedestrian and traffic sections of the Recirculated DEIR summarize the findings and recommendations presented in the *Traffic Study for Los Angeles Unified School District South Region High School No. 9* (TIA) prepared by KOA Corporation dated July 14, 2008.

Following is a summary of our comments based upon our independent review of the pedestrian and traffic sections of the Recirculated DEIR.

1. In Section 2.2 (Project Description) on pages 2-2 through 2-5, the project description shall clarify if the turf playfields and hardcourts in the southern portion of the project site will be open to the public or will be physically separated from the public by a barrier such as a fence or wall. If the turf playfields and hardcourts are not physically separated from the public, then LAUSD cannot effectively control the use of the turf playfields and hardcourts. Therefore, the proposed project must provide adequate on-site parking spaces for the turf playfields and hardcourts to prevent people from parking and encroaching into the residential neighborhoods.
2. In the last paragraph on page 2-3, the proposed project indicates the school may hold school-related events such as athletic activities, special-interest clubs, and extracurricular activities during both the daytime and nighttime. This general description of school-related events encompasses the possibility of the proposed school hosting football games. These football games are large trip generators and

E-1

E-2

have a large parking demand which will most likely exceed the provided 133 parking spaces. The Recirculated DEIR did not analyze the potential impacts to traffic and parking for these school-related events, particularly for football games. Because of the limited trip generation and parking demand data available for high-school football games, trip generation and parking demand data shall be collected from football games hosted by nearby South Gate School. The Recirculated DEIR shall, at a minimum, analyze the potential traffic impacts for school-related events during the circulation network PM peak period (4:00 PM to 6:00 PM) and potential parking impacts for the school-related events. Significant adverse impacts generated by the school-related events shall be mitigated to below a level of significance.

↑
E-2
cont.

3. In Figure 2.1 on page 2-4, the proposed project shows that the service yard and food services building are located on the north end of the project site adjacent to Adella Avenue. Adella Avenue is a local residential road. To minimize impacts to the residential neighborhoods, all food delivery trucks and maintenance and operation trucks should access the proposed school from Tweedy Boulevard via the school parking lot.

E-3

4. In the fourth paragraph on page 2-5, the project description shall clarify that Chakemco Street east of the proposed perimeter road will be vacated by the City of South Gate. The vacation of Chakemco Street would require Chakemco Street to terminate at the proposed perimeter road, and thereby, create a T-intersection. This new intersection of the proposed perimeter road at Chakemco Street shall include, at a minimum, corner cut-offs and American with Disabilities Act (ADA) compliant curb ramps. The site plan on Figure 2.1 on page 2-4 shall be updated to show this new intersection.

E-4

5. In the fifth paragraph on page 2-5, the project proposes to construct a new access road for the two existing properties located southeast of the project site. The access road should be designed to City of South Gate design standards. The Fire Department should approve the access road layout prior to any construction. No parking shall be permitted in the 90° curve sections of the new access road to accommodate truck-turning movements associated with the industrial land uses. Signage and striping shall be based on the latest edition of the *California Manual on Traffic Control Devices* (California Department of Transportation (Caltrans)).

E-5

6. The list of cumulative projects in Table 2-1 on page 2-19 has become outdated since the original circulation of the project scope and Notice of Preparation (NOP) in April 2008. Subsequently, the scope of the proposed project has been changed to incorporate the turf playfields and hardcourts south of Tweedy Boulevard, which was first included in the environmental analysis of the proposed project with the release of the Recirculated DEIR in June 2009. Please contact the City of South Gate and neighboring cities to obtain an updated list of cumulative projects. The traffic analysis shall be updated to include these additional cumulative projects to determine if there are any additional significant adverse traffic impacts. The additional significant adverse traffic impacts, if any, shall be mitigated to below a level of significance.

E-6

7. In Figure 3F-1 on page 3F-3, the intersection of Rayo Avenue at Southern Avenue should be identified as an all-way stop-controlled (AWSC) intersection.

E-7

8. As shown in Figure 3F.1 on page 3F-3, the proposed project forecasted that a total 131 students would walk to school, which is approximately nine percent (9%) of the total student population. However, the pedestrian trip generation of 131 students is low based on experiences and observations at South Gate and South East High Schools.

E-8

9. As discussed in the fourth paragraph on page 3F-7, the school bus drop-off will be located adjacent to the staff/faculty parking lot. To minimize impacts to the residential neighborhoods surrounding the proposed school, all school buses should access the school from Tweedy Boulevard.

E-9

10. As discussed in the second paragraph on page 2.5 and in the last paragraph on page 3F-9, the proposed project would only provide a pedestrian sidewalk on the north side of Tweedy Boulevard adjacent to the proposed school. As set forth in the *Guide for Planning, Design, and Operation of Pedestrian Facilities* (American Association of State Highway and Transportation Officials (AASHTO) 2004), it is generally not recommended to provide sidewalks on one side of the street when both sides of the street are developed, which is the case for Tweedy Boulevard with industrial businesses on both sides between Atlantic Avenue and the proposed perimeter road. These industrial businesses also utilize trucks as part of their normal operating procedures. The City's General Plan adheres to this recommendation by requiring sidewalks on both sides of the street.

By only constructing sidewalks on the north side of Tweedy Boulevard, it would create a gap and discontinuity in the pedestrian circulation system from Atlantic Avenue to the proposed turf playfields and hardcourts south of Tweedy Boulevard. Pedestrian safety is inherently impacted by requiring pedestrians to unnecessarily cross Tweedy Boulevard to access the sidewalk on the north side or to walk in the vehicular roadbed on the south side.

E-10

As noted in the same publication above, pedestrians younger than 18 are not fully aware of their traffic surroundings and sometimes show poor judgment. Even though Mitigation Measure PED-2 recommends to prepare a *Pedestrian Routes to School* plan, it cannot be expected for all students to completely adhere to the *Pedestrian Routes to School* plan and only walk on the north side of Tweedy Boulevard, especially if their destinations are south of Tweedy Boulevard. In addition, the turf playfields and hardcourts may be made available to the general public in accordance with the Civic Center Act. However, the general public may not be aware of the gap in the pedestrian circulation network; and thereby, pedestrian safety is inherently impacted by requiring pedestrians to unnecessarily cross Tweedy Boulevard to access the sidewalk on the north side or to walk in the vehicular roadbed on the south side.

Therefore, Tweedy Boulevard should be constructed to its General Plan designation as a Collector with an 80-foot right-of-way in the immediate vicinity of the proposed school. The 80-foot right-of-way has sufficient width to provide two lanes in each direction, on-street parking and 12-foot sidewalks on both sides of the street for the students. The 80-foot right-of-way will be able to serve vehicles (cars and trucks), bicyclists and pedestrians. Tweedy Boulevard should be designed to City of South Gate design standards.

11. In Figure 3H-1 on page 3H-3, the intersection of Atlantic Avenue at Abbott Road was identified as a study intersection, but this intersection was not analyzed. E-11
12. As shown in Table 3H-4 on page 3H-12, the proposed trip generation only estimated the trip generation for the high school and adult school. As stated in the first paragraph on page 2-5, the community may obtain proper permits to use the turf playfields and hardcourts in the southern portion of the project site. Therefore, the Recirculated DEIR understates the proposed trip generation and may have underreported significant adverse impacts to the study intersections by not accounting for the trips for the turf playfields and hardcourts. The Recirculated DEIR shall reevaluate all study intersections with the new trip generated by the turf playfields and hardcourts. E-12
13. For Mitigation Measure TRK-1 on page 3H-22, the proposed mitigation measure for the intersection of Atlantic Avenue at Firestone Boulevard requires the northbound near-side stop to be relocated to the far side to accommodate the new northbound right-turn lane. This mitigation measure would require coordination with the Los Angeles County Metropolitan Transportation Authority (Metro). E-13
14. As discussed in the last paragraph on page 3H-22 and the first three paragraphs on page 3H-23, implementation of the proposed project would create a significant and unavoidable impact to the intersections of Rayo Avenue at Firestone Boulevard, Atlantic Avenue at Wood Avenue, Atlantic Avenue at Tweedy Boulevard, and Atlantic Avenue at Wood Avenue. The DEIR did not evaluate the effectiveness of the potential mitigation measures for these four (4) intersections in terms of Intersection Capacity Utilization (ICU) or delay and level of service (LOS). Please provide The LOS calculation worksheets for the mitigation measures in the appendix. The DEIR does not identify LAUSD's pro-rata costs of the mitigation measures. E-14
15. The gap survey, the signal warrant analyses, and the LOS calculation worksheets for unsignalized intersections based on the Circular 212 Planning methodology and for Future (Year 2012) Project Conditions with Mitigation were not included in the TIA that was provided in Appendix D of the DEIR prepared in December 2008. Therefore, we could not independently verify the calculations. E-15

We appreciate the opportunity to prepare these comments for your review. If you have any questions or desire additional information, please contact our office at (714) 731-9455.

Sincerely,
Hartzog & Crabill, Inc.



Scott Ma, P.E., T.E.
Senior Engineer

RESPONSE TO SUBMITTAL E –HARTZOG & CRABILL, INC.

JUNE 8, 2009

Response to Comment E-1:

The Project Description does not require revision, because the proposed playfields will not generate additional parking demand due to the fact that the number of students and vehicle trips will not increase. Moreover, adequate parking will be provided by the additional 144 net parking spaces resulting from the proposed project. The parking available will be adequate to serve the potential use of the playfields. Therefore, the proposed project will provide adequate on-site parking spaces for the playfields, and it is assumed that people who may ‘encroach’ in the surrounding neighborhoods would be nominal.

Response to Comment E-2:

The south campus playfields will not be lighted, and will not be used for varsity football games. In addition, the anticipated parking demand will be accommodated by the 133 parking spaces as provided in the DEIR 2008 and the 144 net new parking spaces provided on the new road created south of Tweedy Boulevard as part of the originally proposed project. The May 2009 Recirculated DEIR did analyze the potential impacts to traffic and parking for school-related events, other than varsity football games, which will not occur.

Response to Comment E-3:

The expected vehicle volumes for utility and delivery functions are expected to be very low and queuing conditions or conflicting overlaps with other traffic flows are not expected. Based on the overall anticipated traffic volumes on Adella Avenue due to the project, the traffic study recommended that a neighborhood traffic management plan be implemented that would assist in routing traffic directly to Southern Avenue and Atlantic Avenue and would potentially assist in traffic calming. The provision of separate access points for general access via Tweedy Boulevard and specialized utility access via Adella Avenue at the north end of the site will help to avoid further significant impacts to the Atlantic Avenue/Tweedy Boulevard intersection. Therefore, Adella Avenue would be used for pedestrian, staff/faculty vehicle, and delivery/utility vehicle access to and from the site via this cul-de-sac.

Response to Comment E-4:

The provided site plan is not a final engineering design drawing, but is rather a conceptual layout for the proposed project that would be used to develop final construction drawings and civil engineering drawings for off-site improvements. The proposed new access roadways would all

conform to local industrial roadway standards. The new T-intersection at the new eastern terminus of Chakemco Street would be built to local standards and would also comply with ADA standards.

Response to Comment E-5:

Access roads will be designed in a manner to meet required dimensional standards, providing adequate access and pedestrian safety. The comment's notion that the May 2009 Recirculated DEIR must not be certified until this clarification is formally made is not warranted, as significant impacts do not occur. Signage and striping will be based on the latest edition of the California Manual on Traffic Control Devices (California Department of Transportation (Caltrans)).

Response to Comment E-6:

The analysis of cumulative impacts is adequate as CEQA requires the analysis to represent the existing conditions at the time of the Initial Study/NOP. CEQA Guidelines Section 15064.7(a) states:

“An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant...”

The addition of the proposed playfields does not add floor area or change the design of the proposed project facilities, does not increase the number of classrooms, students, vehicle trips, pedestrian trips, the hours of operation or any other aspect of the proposed project that could conceivably result in new significant environmental effects or a substantial increase in the environmental effects relating to traffic or pedestrian safety that were not previously identified in the December 2008 DEIR.

Response to Comment E-7:

Figure 4 of the TIS and 3F-1 of the May 2009 Recirculated DEIR correctly identify Rayo Avenue at Southern Avenue with four-way stop control.

Response to Comment E-8:

The pedestrian mode breakdown is based on the Program EIR for the current LAUSD building program. Surveys conducted at Bell High School that determined the parking demand ratio used for the project parking analysis indicated that vehicle activity demand is typical when compared to national rates. Therefore, mode split rates determined by surveys of local area schools for the LAUSD Program EIR would be typical of new high school facilities in the area.

Response to Comment E-9:

Restrictions in access for the busing program are not necessary as the busing activities would not result in a significant impact. All entrance streets will be designed in accordance to applicable standards.

Response to Comment E-10:

Providing a four-lane cross-sectional width for Tweedy Boulevard to the east of the Atlantic Avenue corridor would require the purchase and demolition of active business on one or both sides of Tweedy Boulevard. Such actions were considered to be outside the scope of the proposed high school project, hence the determinations made within the TIS and the environmental documentation. A capacity analysis was conducted as part of the TIS; the study did not indicate any particular level of service issues and the TIS did not indicate any particular operational issues on Tweedy Boulevard to the east of Atlantic Boulevard with the proposed project (Appendix D of the December 2008 DEIR, pp. 45-46). Students would primarily be reaching the campus via locations to the northwest and north. Therefore, the need to travel along a southern sidewalk on Tweedy Boulevard would not support typical routes to and from the school. Furthermore, pedestrian volumes will be dispersed among the three potential access points (north via Adella Avenue, west via Tweedy Boulevard, south via Adella Avenue), lessening the potential need for two sidewalk facilities on Tweedy Boulevard.

Response to Comment E-11:

In Figure 3H-1 on page 3H-3, the intersection of Atlantic Avenue at Abbott Road was identified as a study intersection, but this intersection was not analyzed. The study area figure was corrected in previous responses to comments. It was determined that analysis of this intersection was not necessary, as a majority of trips to and from the campus would originate in neighborhoods to the northwest and north of the proposed campus site, and from the Firestone Boulevard corridor and the I-710 interchange within that corridor. This intersection is located to the south of the proposed project site.

Response to Comment E-12:

The play fields would not be used for regular competitive sporting events, and therefore would be complementary uses to the primary school use during typical operations of the school. Specific additional trip generation would not be generated by these facilities under typical weekday peak-hour conditions.

Response to Comment E-13:

Metro would be consulted in the implementation of this mitigation measure.

Response to Comment E-14:

The mitigation measure worksheets for the proposed mitigation measure at the intersection of Atlantic Avenue/Firestone Boulevard is provided in Attachment J. Where mitigation measures were determined to be infeasible, mitigation measure calculations are irrelevant.

Response to Comment E-15:

The signal warrant analysis sheets, and LOS calculations for the unsignalized intersections based on the signalized Circular 212 Planning methodology are provided in Attachment J.

CHAPTER 9.0

Revisions to Draft Environmental Impact Report

As required by *CEQA Guidelines* Section 15132, revisions to the May 2009 Recirculated DEIR resulting from public, agency, and staff review, are summarized in this Chapter. As provided in *CEQA Guidelines* Section 15088.5(a), the lead agency is authorized to include additional information in a FEIR including project modifications, changes in the environmental setting, additional data or other information. The modifications provided herein are minor in nature and do not result in a new, substantial environmental impact, nor do the revisions substantially increase the severity of an environmental impact studied in the May 2009 Recirculated DEIR or December 2008 DEIR. Changes made to the May 2009 Recirculated DEIR are identified in this Chapter as follows:

- ~~strikeout~~ text to indicate deletions
- ***bold, italic, and underline*** text to signify additions

The Chapter, Section, and page number is also provided to assist the reader with referencing the source of the revision.

Executive Summary, p. ES-1 is revised as follows:

This Final Environmental Impact Report (FEIR or August 2009 FEIR) provides revisions to the Recirculated Draft EIR (DEIR or May 2009 Recirculated DEIR) for the proposed project, published for a 45-day public review period beginning May 28, 2009. Revisions to the May 2009 Recirculated DEIR are identified in this FEIR as follows:

- ~~strikeout~~ text to indicate deletions
- ***bold, italic, and underline*** text to signify additions

This ~~The May 2009~~ Recirculated Draft Environmental Impact Report (Draft EIR or DEIR) includes information and analyses updated since ~~an~~ the DEIR was circulated for this project in December 2008 (SCH No. 2008041065). For purposes of ~~elarity and~~ distinction ***in this August 2009 FEIR***, ~~this the~~ recirculated document ~~will be~~ ***is*** referred to as the ***May 2009*** Recirculated DEIR and the previously circulated DEIR ~~will be~~ ***is*** referred to as ***December 2008*** DEIR-2008.

Executive Summary, p. ES-2 is revised as follows:

~~This~~ ***The May 2009*** Recirculated DEIR included information and analyses to consider new playfields proposed for development on the south of the campus, which were not considered in the ***December 2008*** DEIR ~~2008~~. The new playfields proposed are not considered “significant new information” as defined in *CEQA Guidelines* Section 15088.5. Even so, LAUSD has decided to recirculate the ***December 2008*** DEIR ~~2008~~ to enable the responsible and trustee agency, and general public, to review and comment on this new information.

Executive Summary, p. ES-3 is revised as follows:

A 133-space surface parking lot would be located on the far west portion of the site, ***and an additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.*** ~~and~~ Playfields would be located to the east and south of the main campus.

Executive Summary, p. ES-4 is revised as follows:

As allowed by CEQA, ~~this~~ ***the May 2009*** Recirculated DEIR focuses only on those environmental impact categories identified by LAUSD as having “potentially significant” impacts during the notice of preparation (NOP), scoping process, and public review period for the Initial Study.

Environmental factors are listed by the level of significance of their impacts below in Table ES-1 as determined in the Initial Study (see Appendix A of ~~the DEIR 2008~~ ***this August 2009 FEIR***).

1.0 Introduction, p. 1-1 is revised as follows:

This Final Environmental Impact Report (FEIR or August 2009 FEIR) provides revisions to the Recirculated Draft EIR (DEIR or May 2009 Recirculated DEIR) for the proposed project, published for a 45-day public review period beginning May 28, 2009. Revisions to the May 2009 Recirculated DEIR are identified in this FEIR as follows:

- ~~strikeout~~ text to indicate deletions
- ***bold, italic, and underline*** text to signify additions

The CEQA ~~review~~ ***documentation*** included the Initial Study and Notice of Preparation (NOP), circulated for public review between April 11, 2008 and May 12, 2008.

The Initial Study determined that an ~~Environmental Impact Report (EIR)~~ was warranted for determining the effects of the proposed project, to provide feasible alternatives, and mitigation measures.

As a result, a DEIR was prepared and circulated to the public and affected agencies in December 2008 for a 45-day review period (SCH No. 2008041065), hereinafter referred to as the *December 2008 DEIR*.

1.0 Introduction, p. 1-2 is revised as follows:

~~Since the circulation of the *The December 2008 DEIR-2008* was recirculated by LAUSD for a 45-day review period, beginning May 28, 2009, to analyze potential environmental impacts resulting from constructing and operating~~ modified their site plan to include new playfields proposed for development to the south of the *main* campus.

~~This *The May 2009* Recirculated DEIR includes analyses for the new playfields. For purposes of clarity and distinction, this document will be referred to as the *May 2009* Recirculated DEIR *in this August 2009 FEIR*.~~

Even so, LAUSD has decided to recirculate the *December 2008* DEIR-2008 to include associated CEQA analysis *of potential environmental impacts from constructing and operating the south campus playfields* for public consideration, in this *the May 2009* Recirculated DEIR.

1.0 Introduction, p. 1-3 is revised as follows:

This section provides a summary of the issues addressed in this *the May 2009* Recirculated DEIR, which are consistent with those analyzed in the *December 2008* DEIR-2008. The CEQA documentation was prepared following input from the public, responsible agencies, affected agencies, and other interested parties through the EIR scoping *and public review* process, which included the following activities:

- A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the ~~DEIR-2008~~ *December 2008 DEIR*. A summary of the comments received during the scoping meeting are provided in Appendix A of ~~the DEIR-2008~~ *this August 2008 FEIR*.
- A summary of the comments received during the scoping meeting are provided in Appendix A of ~~the DEIR-2008~~ *this August 2009 Final EIR*.
- ~~A Draft EIR~~ *The December 2008* DEIR-2008 and Notice of Availability (NOA) were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from December 5, 2008 to January 19, 2009).
- *The NOA was posted in the County Clerk's office for 45 days from December 5, 2008 to January 19, 1009 and was submitted to the State Clearinghouse on December 5, 2008 to officially solicit participation in the findings of the December 2008 DEIR.*

1.0 Introduction, p. 1-4 is revised as follows:

- *A public meeting was held on December 6, 2008 a Bryson Elementary School to gather input from the local community regarding the findings of the December 2008 DEIR.*
- *The May 2009 Recirculated DEIR and NOA were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from May 28, 2009 to July 13, 2009).*
- Information requested and input provided during the 45-day public review period for the *May 2009 Recirculated DEIR-2008 is incorporated in this August 2009 FEIR (See Section 8, Response to Comments).*

The content of the *December 2008 DEIR and May 2009 Recirculated DEIR* were established based on the findings in the Initial Study and public and agency input.

This *The May 2009 Recirculated DEIR* is being was recirculated for review and comment by public and interested parties for a period of ~~30~~ 45 days after publication.^{1,2} Responses to any comments received and any necessary revisions to the *May 2009 Recirculated DEIR* will be *are* provided in this *August 2009 FEIR*. The FEIR will be considered for certification by the Board following the public review and comment period and before a decision is made on the proposed project.

1.4 FINAL ENVIRONMENTAL IMPACT REPORT ORGANIZATION

This *August 2009 FEIR* Recirculated EIR is organized into the following chapters so the reader can easily obtain information about the project and its specific issues. Additional information, such as the Initial Study/NOP, can be obtained in the ~~DEIR-2008~~ *December 2008 DEIR*.

1.0 Introduction, p. 1-5 is revised as follows:

- *Chapter 6: Final EIR Introduction - Provides background on the review process for the NOP/IS and May 2009 Recirculated DEIR and provides guidelines about recirculation.*
- *Chapter 7: Community Outreach and Public Review Process - Provides information related to the distribution of the NOP/IS and the May 2009 Recirculated DEIR, such as where the documents are available, how many copies were distributed, and to whom.*
- *Chapter 8: Response to Comments - Presents a discussion on the comments received on the May 2009 Recirculated DEIR during the public review period.*
- *Chapter 9: Changes to the DEIR – Provides the textual changes made to the May 2009 Recirculated DEIR by Chapter and page number. .*

¹ CEQA Guidelines, CCR, Title 14, Chapter 3, §15105(a), 2007.

²- As provided by CEQA Guidelines Section 15105 and Guidelines Appendix K(item 3), LAUSD has requested to make this Recirculated Draft EIR available for a 30-day public review and comment period as the document is a supplement to a Draft EIR previously submitted to the State Clearinghouse.

- **Chapter 10: Mitigation Monitoring and Reporting Plan - Provides a discussion and a table of the project impacts along with their mitigation measures.**
- **Chapter 611: Acronyms and Abbreviations** – Presents a list of the acronyms and abbreviations relevant to the August 2009 FEIR-EIR.
- **Chapter 712: References** – Identifies the documents and individuals consulted in preparing the August 2009 FEIR-EIR.
- **Chapter 813: List of Preparers** – Lists the individuals involved in preparing this EIR and organizations and persons consulted.
- **Appendices** – Present data supporting the analysis or contents of the August 2009 FEIR-EIR.
- The Appendices include the following:

A – Initial Study and NOP

A1 – Comments Received on Initial Study

B – Shade and Shadow Analysis

C – Air Quality Model Outputs

D – Geological Survey

E – Health Risk Assessment

F – Pipeline Safety Assessment

G – Radio Frequency Memorandum

H – Noise Modeling Outputs

I - LACFD Station No. 54, Project Response Summary

J - Traffic Impact Study / Pedestrian Safety Study

K-Exhibit to Letter Received from Celeste Shahl Brady, Stradling Yocca Carlson & Rauth (July 10, 2009)

~~A – Air Quality Model Outputs~~

~~B – Pipeline Safety Assessment~~

1.0 Introduction, p. 1-6 is revised as follows:

Additional documents referenced in ~~this~~ the May 2009 Recirculated DEIR that are not included in the appendices are available at LAUSD's Office of Environmental Health and Safety located at 1055 West 7th Street, 9th Floor, Los Angeles.

The May 2009 Recirculated DEIR for the proposed project ~~will~~ was be distributed directly to numerous agencies, organizations, interested groups, and persons for comment during the comment period. The May 2009 Recirculated DEIR is also available at the following locations:

In addition, the May 2009 Recirculated DEIR is available online at the LAUSD Facilities Services Division website (<http://www.laschools.org/find-a-school>).

The Board Meeting to act on this August 2009 FEIR is tentatively scheduled for August 25, 2009. Please contact the Board Secretariat Office at (213) 241-7002 to confirm the date and time of the upcoming Board meeting.

Introduction, p. 1-7 is revised as follows:

1.7 AGENCY COMMENTS

If this document includes information necessary for your agency to meet any statutory responsibilities related to the proposed project, Per CEQA Guidelines 15087, LAUSD needs to know solicited public comment the views of your agency regarding the scope and content of the environmental information included in this August 2009 FEIR. ~~Your~~ agency will need to use the environmental

documents prepared by LAUSD when considering any permits or other approvals necessary to implement the project. The environmental topics studied by LAUSD are provided in Chapter 3 of this the May 2009 Recirculated DEIR. The project description, location, and the environmental issues to be addressed in this August 2009 FEIR are contained in the attached materials. Due to the time limits mandated by state law, all written responses ~~must be sent to LAUSD~~ were requested on or before ~~June 27~~ July 13, 2009, or a minimum of ~~30~~ 45 days after publication of this notice [May 22-28].³ ~~Please send your response to:~~

Gwenn Godek, Senior CEQA Project Manager/Consultant
Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017

~~Your comments may also be sent by fax to (213) 893-7412 or by email to: eeqa-comments@lasechools.org. Please include "South Region High School No. 9" in the subject line. Agency responses should include the name of a contact person within the commenting agency.~~ In compliance with CEQA Guidelines Section 15088, commenting agencies were provided with responses to their comments on the May 2009 Recirculated DEIR ten days prior to the tentatively scheduled certification date of August 25, 2009. Responses to all comments are provided in Chapter 8.0 of this August 2009 FEIR.

1.8 Revisions to the Revised Draft Environmental Impact Report

Revisions to the May 2009 Recirculated DEIR resulting from public, agency, and staff review are summarized in Chapter 9.0. As provided in CEQA Guidelines Section 15088.5(a), the lead agency is authorized to include additional information in a FEIR including project modifications, changes in the environmental setting, additional data, or other information. The modifications provided herein are minor in nature, and neither result in a new, substantial environmental impact nor substantially increase the severity of an environmental impact already studied in the May 2009 Recirculated DEIR. The lead agency therefore determined that recirculation of the revised EIR was not required as specified in CEQA Guidelines Section 15088.5(b).

CEQA Guidelines Section 15088.5(b) does not require recirculation of an EIR as a matter of course, but only in limited circumstances, as follows:

³ CEQA Guidelines, CCR, Title 14, Chapter 3, §15105 et al., 2007.

1. When the new information shows a new, substantial environmental impact resulting either from the project or from a mitigated measure;
2. When new information shows a substantial increase in the severity of an environmental impact (unless mitigation measures reduce the impact to insignificance);
3. When new information shows a feasible alternative or mitigation measure that clearly would lessen environmental impacts, but it is not adopted; or
4. When the EIR was so fundamentally inadequate that meaningful public review and comment were precluded.

The modifications throughout this August 2009 FEIR do not meet any of these criteria, as demonstrated in the Chapter 3.0 Environmental Analyses and supporting studies to this August 2009 FEIR.

2.0 Project Description, p. 2-3 is revised as follows:

An additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.

2.0 Project Description, p. 2-5 is revised as follows:

An additional 170 new parking spaces along the road would be provided.

2.0 Project Description, p. 2-12 is revised as follows:

DTSC's determination would confirm the elimination of any risk to the health and safety of students, faculty, employees and other persons. The schedule described above would assure this determination would occur before the school facilities could be occupied, and would be consistent with the Initial Study's determination that the proposed project would not result in a significant hazardous materials impact.

3.0 Environmental Analysis, p. 3-1 is revised as follows:

An Initial Study and NOP was prepared for the proposed project in April 2008 (refer to Appendix A of the ~~DEIR 2008~~ of this August 2009 FEIR). Based on the findings, LAUSD determined that an EIR would be required for the proposed project. A public scoping meeting was held on April 24, 2008 at Bryson Elementary School to gather input from the local community regarding the scope of the December 2008 DEIR. The December 2008 DEIR and NOA were prepared and distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from December 5, 2008 to January 19, 2009). The May 2009 Recirculated DEIR was distributed to responsible agencies, affected agencies, and other interested parties, for a period of 45 days (from May 28, 2009 to July 13, 2009), to notify the public that the inclusion of playfields proposed south of the main campus would not result in additional impacts as compared to the project analyzed in the December 2008 DEIR.

LAUSD used the Initial Study Checklist, ~~as well as~~ agency and public input received during the NOP comment period and the public scoping meeting, and comments received on the December 2008 DEIR, to determine the scope of the evaluation for the May 2009 Recirculated DEIR.

3A Aesthetics, p. 3A-1 is revised as follows:

Impacts related to views, scenic resources, and nighttime illumination were found to be less than significant in the Initial Study (see Appendix A ~~of the DEIR 2008~~ of this August 2009 FEIR). Potential impacts to shade and shadow were included for additional analysis (refer to Appendix B).

3B Air Quality, p. 3B-1 is revised as follows:

See Appendix ~~AC~~ for the model outputs.

3B Air Quality, p. 3B-20 is revised as follows:

construction phase duration assumptions used in this analysis are included within the URBEMIS2007 printout sheets provided in Appendix ~~AC~~ of this Recirculated DEIR of this August 2009 FEIR.

3B Air Quality, p. 3B-21 is revised as follows:

In calculating mobile-source emissions, the URBEMIS2007 ~~default~~ trip length assumptions were not changed from the default value of 9.26 mile per trip average, to reflect potential long-term operational emissions resulting from mobile sources related to travel to and from Bell, Huntington Park, South East and South Gate High Schools, located 2.7, 5.5, 1.6 and 2.3 miles from the new playfields, a specific vehicle trip length identified by LAUSD. As documented in the PEIR, student vehicles traveling to and from central region elementary schools travel an average of 0.25 mile per trip.⁴

The CO hotspot analysis worksheets and assumptions are provided in Appendix ~~C~~ of the DEIR 2008 of this August 2009 FEIR.

3B Air Quality, p. 3B-23 is revised as follows:

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were potentially significant (see Appendix ~~A~~ of the DEIR 2008 of this August 2009 FEIR).

3B Air Quality, p. 3B-27 is revised as follows:

The average of daily trips is based on information from the Traffic Impact Study prepared for the proposed project (see Appendix ~~DJ~~), as well as the trip generation rates provided by the Institute of Transportation Engineers (ITE) *Trip Generation Manual*.⁵

⁴ LAUSD, OEHS, *New School Construction Program, Final Program Environmental Impact Report (incorporates the New School Construction Program, Draft EIR)*. Published May 2004, Board Certified June 8, 2004. p. 3.1-1.

⁵ ITE, *Trip Generation Manual, 7th Edition*, 2004.

3C Geology and Soils, p. 3C-1 is revised as follows:

The information and findings in this section are supported by summarized the Geotechnical Study for the proposed project (refer to Appendix D of this August 2009 FEIR).

3D Hazards and Hazardous Materials, p. 3D-1 is revised as follows:

According to the Health Risk Assessment, the site has been used for a variety of commercial and manufacturing operations since the 1930s including, but not limited to, foundries, machine shops, pesticide production facilities, a paper mill, a trucking terminal, metal plating, and manufacturing plants for various goods (refer to Appendix E).⁶

3D Hazards and Hazardous Materials, p. 3D-3 is revised as follows:

LAUSD is required to comply with applicable regulations pertaining to contaminated soils and groundwater, including California Education Code Section 17213 et seq. In addition, LAUSD would comply with SCAQMD Rule 1166 (VOC Emissions from Decontamination of Soil), including, but not limited to, development of a VOC soil mitigation plan. As a result, remaining contamination and associated remediation activities will have no impact on the health and safety of those occupying the area, and site development will not occur prior to removal of existing hazardous materials pursuant to DTSC approval. The Health Risk Assessment for the proposed project site is provided as Appendix E.

3D Hazards and Hazardous Materials, p. 3D-4 is revised as follows:

Refer to **Appendix BF** for the Pipeline Hazard Safety Assessment.

3D Hazards and Hazardous Materials, p. 3D-8 is revised as follows:

LAUSD has determined that the potential soil excavation at the site would include soils classified as a hazardous waste due to the presence of chemicals including petroleum hydrocarbons in the soil. LAUSD would comply with SCAQMD Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil), including, but not limited to, development of a VOC soil mitigation plan.

3D Hazards and Hazardous Materials, p. 3D-9 is revised as follows:

Refer to **Appendix BF** for the Pipeline Safety Assessment.

3D Hazards and Hazardous Materials, p. 3D-10 is revised as follows:

Impact 3D.4: Located on a site where the property is near a Electro-Magnetic Fields (EMF) Source, such as a powerline or radio frequency transmission facility.

⁶ URS Corporation, *Health Risk Assessment for South Region High School #9*, revised July 2008 July 2009.

(Less Than Significant Impact). The playfields proposed to the south of the main campus are located adjacent to a radio frequency transmission facility. A survey was conducted on the site and in the adjacent neighborhood to determine the radiofrequency (RF) EMF levels from this tower. RF levels detected onsite, near the tower, are equal to, or slightly higher than background levels found in the neighborhood. The Federal Communication Commission (FCC) is the regulatory agency responsible for setting health protective thresholds for cellular antennas and have set a safety threshold of 1,000 microwatts/centimeter² ($\mu\text{W}/\text{cm}^2$). RF levels onsite were measured to be between 0.065 $\mu\text{W}/\text{cm}^2$ and 1.296 $\mu\text{W}/\text{cm}^2$ (see Appendix G). No further studies are required.

Additionally, one 66 kV power line has been identified adjacent to the southern boundary of the project site. In order to comply with California Department of Education setbacks, a 100-foot buffer will be incorporated into the site design. Power line impacts will be less than significant after incorporation of this setback.

MITIGATION MEASURES

No mitigation measures are required.

RESIDUAL IMPACTS

Impacts would be less than significant.

3E Noise, p. 3E-1 is revised as follows:

Noise monitoring results are provided as Appendix H of this August 2009 FEIR.

3E Noise, p. 3E-12 is revised as follows:

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A of the DEIR 2008).

3E Noise, p. 3E-14 is revised as follows:

Non-vehicular operational activities associated with the proposed project that would generate noise include student activity on-site (especially within the football and baseball stadiums~~fields~~), bells, and alarms. These sources would be limited to school hours. The sports fields ~~football and baseball stadiums, as well as basketball courts,~~would be located on the eastern and southern portion of the proposed project site.

3E Noise, p. 3E-15 is revised as follows:

Athletic activity (for example, basketball, tennis, baseball, etc.) would result in a noise level of approximately 65 dBA L_{eq} at 50 feet.⁷ Noise generated by activity in

⁷ LAUSD, OEHS, *New School Construction Program, Final PEIR (incorporates the New School Construction Program, DEIR)*, published May 2004, Board Certified June 8, 2004. p. 3.3-8.

the football and baseball stadiums fields would be audible to residences along Wood Avenue and Aldrich

3F Pedestrian Safety, p. 3F-1 is revised as follows:

Traffic Impact Analysis prepared by KOA, which is provided in Appendix DJ of the DEIR 2008 of this August 2009 FEIR.

The following streets act as boundaries to the Proposed Project site: Wood Avenue, Aldrich Road, and Atlantic Avenue. Wood Avenue is a two-lane roadway, and Atlantic Avenue and Tweedy Boulevard are four-lane roadways. *Wood Avenue and Aldrich Avenue are a two-lane roadways, and Atlantic Avenue is a four-lane roadway.*

3F Pedestrian Safety, p. 3F-5 is revised as follows:

The Traffic and Pedestrian Safety Study (Appendix DJ of the DEIR 2008 of this August 2009 FEIR) conducted for this project follows guidelines agreed upon in the MOU.

3F Pedestrian Safety, p. 3F-10 is revised as follows:

At the intersection of Atlantic Avenue at Wood Avenue, the acceptable gap time was calculated at 24 seconds (see Appendix DJ for methodology).

3G Public Services, p. 3G-2 is revised as follows:

As described in the Initial Study, Section 4N (see Appendix A of the DEIR 2008 of this August 2009 FEIR),

Refer to Appendix I for LACFD correspondence documentation.

3G Public Services, p. 3G-4 is revised as follows:

The environmental impact analysis presented below is based on the determinations made in the Initial Study for issues that were determined to be potentially significant and potentially significant with mitigation incorporated (see Appendix A of the DEIR 2008 of this August 2009 FEIR).

3G Public Services, p. 3G-5 is revised as follows:

EMERGENCY ACCESS AND FIRE FLOW

Less Than Significant Impact. The Traffic Impact Analysis for the proposed project (see Appendix DJ of the DEIR 2008) found that the project would add traffic to surrounding intersections and street segments; however, the traffic increase would not significantly change existing service levels for fire protection.

3H Traffic, p. 3H-1 is revised as follows:

The complete traffic study is provided in Appendix DJ of the DEIR 2008 of this August 2009 FEIR.

3H Traffic, p. 3H-7 is revised as follows:

The traffic analysis worksheets for the existing conditions scenario are provided in Appendix ⒹJ of this August 2009 FEIR.

3H Traffic, p. 3H-9 is revised as follows:

see Appendix ⒹJ of this August 2009 FEIR.

3H Traffic, p. 3H-26 is revised as follows:

An additional 170 new parking spaces along the road that would be built south of Tweedy Blvd. The proposed project will result in the removal of 26 spaces of street parking at that portion of the site, resulting in 144 net parking spaces on the street.

Chapter 4, Alternatives, p. 4-2 is revised as follows:

LAUSD certified an EIR in connection with its acquisition of the site in 1991.⁸ An analysis of alternative locations for SRHS No. 9 was performed in the CEQA documentation performed for site acquisition. Several alternative scenarios were identified and evaluated in the 1991 EIR, including the "no project" and several alternative locations for the proposed elementary and senior high schools. A generalized assessment of each of the alternatives is provided in the text. The LAUSD established several criteria for site selection, and identified sites which meet the minimum requirements for planned school facilities (e.g., site size, facility/space requirements, etc.). For the proposed project, the District identified five alternative sites meeting the minimum requirement for the proposed project. The 1991 EIR analysis was based upon the following: 1). minimized displacement of owner-occupied homes and apartments, 2). located in an area to relieve overcrowding at two or more schools, 3). provides adjoining streets.

The proposed project site was preferred as it is the only option that did not result in issues related to displacement and relocation, or proximity to a chemical plant, which poses a potential for health hazards to future students, which are expressly prohibited according to AB 3205. Based on the thorough analysis of the preferred alternative and the assessments of the five alternative site location alternatives; , the preferred alternative (i.e., proposed project) is considered the "environmentally superior" alternative. This is predicated primarily on the fact that each of the alternatives would necessitate higher displacement of residential and/or industrial/commercial development.

⁸ Environmental Perspectives, Final Environmental Impact Report, South Gate New Senior High School No. 1 and South Gate New Elementary School No. 3; Prepared for the Los Angeles Unified School District, March 1991.

5 Other CEQA Considerations, p. 5-1 is revised as follows:

This chapter presents the evaluation of other types of environmental impacts required by CEQA that are not covered the other chapters of the May 2008 Recirculated DEIR. The other CEQA considerations include environmental effects that were found not to be significant, growth-inducing impacts, and significant and unavoidable impacts.

The surrounding area is located on generally level terrain with the exception of the Los Angeles River levee adjacent to the east. The land uses to the north include residential development, followed by Wood Avenue and additional residential development. Tweedy Boulevard is adjacent to the south, followed by vacant land of similar condition as the proposed project and owned by LAUSD. Commercial and light industrial development also occurs to the south, followed by Aldrich Avenue and residential development. Commercial uses occur to the west, followed by Atlantic Boulevard, which is described as a highly urbanized roadway. The Los Angeles River is located to the east, followed by residential development and I-710 (located approximately 1,130 feet east from the site). Union Pacific Railroad (Spur No. 810961T) is located directly to the northeast.

10.3 Roles and Responsibilities

LAUSD is acting as the Lead Agency under CEQA for the project. Acting as the Lead Agency, LAUSD is required to monitor the development and operation of the project to ensure that the mitigation measures identified in the adopted EIR are implemented.^{3,4} However, because of the nature of some of the mitigation measures identified in the May 2009 Recirculated DEIR, LAUSD may delegate duties and responsibilities to environmental monitors or other professionals as warranted.

LAUSD would be required to comply with all applicable plans, permits, and conditions of approval. The contractor bid packages would include the mitigation measures/project commitments required to complete the construction of the new school and their implementation schedule. The mitigation measures presented in **Table 10-1** on the following pages would be implemented before construction, during construction, and during operation of the proposed project. The following agencies will be responsible for enforcing the measures identified in this report:

- Los Angeles Unified School District (LAUSD) Facilities Services Division – New Construction;
- Los Angeles Unified School District (LAUSD) Office of Environmental Health and Safety; and
- County of Los Angeles Department of Public Works (LACDPW).

³ CEQA, PRC, §21081.6, 2005.

⁴ CEQA Guidelines, CCR, Title 14, Division 6, Chapter 3, §§15091 (d) and 15097, 2005.

**TABLE 10-1
SOUTH REGION HIGH SCHOOL NO. 9
MITIGATION MONITORING AND REPORTING PLAN**

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
3B. Air Quality					
<p>Impact 3B.1: Violate an air quality standard or contribute to an existing or projected air quality violation.</p>	<p>Mitigation Measure AIR-1:</p> <ul style="list-style-type: none"> • General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403. • Apply dust suppressants (e.g., polymer emulsion) to actively disturbed areas upon completion of clearing and grading. • Replace ground cover in disturbed areas as quickly as possible. • Water disturbed sites <u>three</u> times daily (locations where grading is to occur will be thoroughly watered prior to earth moving). • All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches. • Traffic speeds on all unpaved roads shall be reduced to 15 mph or less. • During construction, trucks and vehicles in loading and unloading queues would turn their engines off when not in use to reduce vehicle emissions; all construction vehicles shall be prohibited from idling in excess of ten minutes, both on- and off-site. • Require minimum soil moisture of 12 percent for earthmoving by use of a moveable sprinkler system or a water truck. Moisture content can be verified by lab sample or moisture probe. • Construction emissions will be scheduled to avoid emission peaks and discontinued during second-stage smog alerts. 	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>During project construction</p>	

**TABLE 10-1
SOUTH REGION HIGH SCHOOL NO. 9
MITIGATION MONITORING AND REPORTING PLAN**

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
<p>Impact 3B.2: Expose sensitive receptors to substantial pollutant concentrations.</p>	<ul style="list-style-type: none"> General contractors shall maintain and operate construction equipment to minimize exhaust emissions; all construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications. 				
	<p>Mitigation Measure AIR-1</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>During project construction</p>	
<p>3E. Noise</p>					
<p>Impact 3E.1: Expose persons to or generation of noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.</p>	<p>Mitigation Measure NOI-1: LAUSD's construction shall not occur within the City of South Gate's noise sensitive hours of 10 PM and 7 AM.</p> <p>Mitigation Measure NOI-2: LAUSD's construction contractor shall require all construction equipment, stationary and mobile, be equipped with properly operating and maintained muffling devices.</p> <p>Mitigation Measure NOI-3: LAUSD's construction contractor shall provide advance notification to adjacent property owners and post notices adjacent to the proposed project site with regard to the schedule of construction activities.</p> <p>Mitigation Measure NOI-4: LAUSD's construction contractor will require all stationary construction equipment and vehicle staging areas to be placed such that noise is directed away from sensitive receptors, as feasible.</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>During project construction</p>	

**TABLE 10-1
SOUTH REGION HIGH SCHOOL NO. 9
MITIGATION MONITORING AND REPORTING PLAN**

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
3F. Pedestrian Safety					
<p>Impact 3F.1: Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible land uses.</p>	<p>PED-1 LAUSD shall coordinate with the City of South Gate and UP Railroad to provide warning signs near the railroad crossing areas adjacent to the school. PED-2 Six months prior to opening the school, LAUSD's OEHS shall coordinate with the City of South Gate to prepare a "Pedestrian Routes to School" plan. LAUSD's OEHS will distribute the maps to the school upon completion and the maps will then be distributed to students, parents and staff. PED-3 LAUSD shall coordinate with the City of South Gate to approve plans to construct a sidewalk along the north side of Tweedy Boulevard between Atlantic and the school property line.</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p> <p>LAUSD, Office of Environmental Health and Safety</p> <p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p> <p>LAUSD, Office of Environmental Health and Safety</p> <p>LAUSD, Office of Environmental Health and Safety</p>	<p>Prior to school operation</p> <p>Prior to school operation</p> <p>Prior to school operation</p>	
<p>Impact 3F.2: Create unsafe routes for students walking from local neighborhoods.</p>	<p>PED-4 Four months prior to opening the proposed high school, 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.</p> <p>PED-5 Six months prior to opening of the proposed high school, LAUSD's OEHS shall coordinate with the citywide traffic control program section for preparation of a final "Pedestrian Routes to School Plan" for the safe arrival and departure of students in accordance with the "School Area Pedestrian Safety Manual." The plan shall include a "Pedestrian Routes to School Map" for distribution to all students and parents. Parents and students shall be notified to use the existing traffic safeguards.</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>Prior to school operation</p>	
<p>Impact 3F.3: Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard.</p>	<p>Mitigation Measure PED-5</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>LAUSD Facilities Services Division – New Construction, Owners Authorized Representative</p>	<p>Prior to and during project operation</p>	

**TABLE 10-1
SOUTH REGION HIGH SCHOOL NO. 9
MITIGATION MONITORING AND REPORTING PLAN**

Impact	Mitigation Measures	Responsible Monitoring Party	Responsible Implementing Agency	Implementation Phase	Completion Date/Initials
Impact 3F.4: Result in cumulatively considerable impact with respect to pedestrian safety.	Mitigation Measures PED-1 through PED-	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction	Prior to and during project operation	
3H. Traffic and Transportation					
Impact 3H.1: Cause a substantial increase in traffic in relation to the existing traffic load and capacity of the street system (for example, result in a substantial increase in either the number of vehicle trips, the V/C ratio on roads, or congestion at intersections).	<p>Mitigation Measure TRK-1: At the intersection of Atlantic Avenue and Firestone Boulevard, LAUSD shall coordinate with the City of South Gate to implement a northbound dedicated right turn lane. The northbound bus stop at this location shall be moved to the far side of the intersection (the southeast corner stop is a near-side stop).</p> <p>Mitigation Measure TRK-2: LAUSD shall coordinate with the City of South Gate to develop a Neighborhood Traffic Management Plan for the roadway segments of Adella Avenue north of Wood Avenue and Tweedy Boulevard west of the project site boundary. LAUSD will contribute funds in an amount not to exceed \$25,000 toward the completion of a Neighborhood Traffic Management Plan study, including public meetings and the implementation of traffic calming measures, such as speed humps/cushions or more intense improvements, such as turn restrictions and geometric changes to enforce those restrictions.</p>	LAUSD Facilities Services Division – New Construction, Owners Authorized Representative	LAUSD Facilities Services Division – New Construction	Prior to and during project operation	
Impact 3H.4: Result in a cumulatively considerable impact with respect to traffic.	Mitigation Measures TRK-1 and TRK-2				

CHAPTER 11.0

Acronyms and Abbreviations

AAQS	Ambient Air Quality Standards
ADT	Average Daily Trips
ANSI	American National Standards Institute
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
ASHRAE	American Society of Heating, Refrigeration and Air Conditioning Engineers
ASTM	American Society for Testing and Materials
ATSAC	Automated Traffic Surveillance and Control
Basin	South Coast Air Basin
Board	Los Angeles Board of Education
BMP	Best Management Practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDMG	California Division of Mines and Geology
CEQA	California Environmental Quality Act

CHPS	Collaborative for High Performance Schools
City	City of South Gate
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide
CRHR	California Register of Historical Resources
dB	decibel
dba	A-weighted decibel
DHS	Department of Health Services
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
HVAC	Heating Venting Air Condition
IS	Initial Study
ITE	Institute of Transportation Engineers
LACMTA	Los Angeles County Metropolitan Transportation Authority
LADOT	Los Angeles Department of Transportation
LAMC	Los Angeles Municipal Code
LAUSD	Los Angeles Unified School District
L_{dn}	day-night level
L_{eq}	equivalent sound level
L_{max}	maximum sound level
L_{min}	minimum sound level
LOS	level of service

LST	Localized Significance Threshold
MMRP	Mitigation Monitoring and Reporting Program
MOA	Memorandum of Agreement
MOC	Memorandum of Cooperation
MOU	Memorandum of Understanding
mph	miles per hour
MTA	Metropolitan Transportation Authority
NAAQS	National Ambient Air Quality Standards
NO	nitric oxide
NO ₂	nitrogen dioxide
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register Historic Places
O ₃	ozone
OEHS	Office of Health and Safety
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
Pb	lead
PEIR	Program Environmental Impact Report
PM ₁₀	particulate matter
PPM	parts per million
PPV	peak particle velocity
RAP	Remedial Action Plan
ROC	reactive organic compounds
RMS	root mean square

RWQCB	Regional Water Quality Control Board
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	Southern California Air Quality Management District
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO ₄	sulfates
SO _x	sulfur oxides
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminants
TIA	transportation impact assessment
USEPA	United States Environmental Protection Agency
V/C	volume-to-capacity ratio
VOC	volatile organic compounds

CHAPTER 12.0

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CHAPTER 10.0

Mitigation Monitoring and Reporting Plan

10.1 Introduction

Pursuant to CEQA¹ and the *CEQA Guidelines*,² when a Lead Agency makes findings of significant effects in certifying the EIR, the agency must also adopt a plan for the monitoring of mitigation measures identified in the EIR. The primary purposes of the monitoring plan are to ensure that the mitigation measures identified in the EIR are implemented and that environmental effects are minimized. Additionally, the monitoring plan provides: (1) a mechanism for giving agency staff and decision-makers feedback on the effectiveness of their actions; (2) a learning opportunity for improved mitigation measures on future projects; and (3) a means of identifying corrective actions, if necessary, before irreversible environmental damage occurs.

10.2 Project Location and Description

The proposed project site is located in the City of South Gate in southeastern Los Angeles County, directly north of Adella Avenue and Tweedy Boulevard. The proposed project site is generally bounded by residential development to the north, beyond which is Wood Avenue; District-owned land to the south, beyond which is Aldrich Avenue; commercial uses to the west, beyond which is Atlantic Boulevard; and the Los Angeles River channel to the east. Interstate 710 (I-710) is also located approximately 1,130 feet east of the proposed project site.

The proposed project site is located in a highly urbanized area of the City of South Gate. In general, urban and suburban residential land uses dominate much of the land area within the City of South Gate. Additionally, commercial and industrial land uses are prevalent along freeway and railway rights-of-way and major urban roadways, such as boulevards and streets. The site has an abandoned appearance and is primarily vacant, with the exception of one warehouse and four modular storage buildings of various dimensions. All remaining structures, included building foundations and asphalt parking areas, would be removed during construction of the proposed project. The site is roughly square in plan and the topography is relatively level, with an elevation of approximately 95 feet above mean sea level.

¹ CEQA, PRC, §21000 et al., 2005.

² *CEQA Guidelines*, CCR, Title 14, Division 6, Chapter 3, §§15091 (d) and 15097, 2005.

CHAPTER 13.0

Report Preparation

Los Angeles Unified School District

Office of Environmental Health and Safety

Gwenn Godek, CEQA Project Manager/Consultant
Randi Cooper, Senior CEQA Project Manager/Consultant
John Anderson, Senior CEQA Project Manager/Consultant

Environmental Science Associates

Eric Ruby, Director
Cynthia Wren, Senior Managing Associate
Deborah Kirtman, QA/QC Officer
Rachel Schwartz, Senior Associate
Chris Sanchez, Air Quality Analysis
Donald Ambroziak, Noise Monitoring and Analysis
Julie Moore, Hazards and Hazardous Waste
Rebecca Skaggs, Traffic and Transportation
Yanwu Zhou, Aesthetics (Shade and Shadow Analysis)
Jason Nielsen, Graphics
Gus JaFolla, Publication Coordination

Katz, Okitsu and Associates

Joel Falter, Vice President
Brian Marchetti, Traffic Engineer

From: Paek, Edward
To: ["Steve Itagaki"](#); [Brian Marchetti](#)
Cc: [Hany Henein](#); [Clint Herrera](#); [Dahdul, Issam](#)
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)
Date: Thursday, October 29, 2015 3:34:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Steve/Clint/Hany,

Thanks again for meeting with us the other day. We will revise the traffic scoping document based on our discussion and resend to you shortly.

I also discussed some of your questions with our Facilities team and have a few clarifications:

- We confirmed that Chakemco will only be vacated between the new Legacy Lane and Adella (also to be vacated). Therefore, we will include potential school access from Atlantic to Chakemco in our traffic study.
- The City should process this project as a new project, completely separate from South Region HS#9, and subject to standard review processes and fees for other development projects occurring in the City.

Please let us know if you have any other questions.

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-6281 | 28-134-06

From: Steve Itagaki [<mailto:sitagaki@sogate.org>]
Sent: Tuesday, October 27, 2015 7:47 AM
To: Paek, Edward; Brian Marchetti
Cc: Godek, Gwenn; Hany Henein; Clint Herrera; Dahdul, Issam
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hello Ed,

Today at 4 pm works best. Thursday will not work due to scheduling conflicts.
Please confirm today's attendance.

Thanks.

Steve

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Monday, October 26, 2015 9:44 AM
To: Steve Itagaki; Brian Marchetti
Cc: Godek, Gwenn; Hany Henein; Clint Herrera; Dahdul, Issam
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Good morning Steve,

Tuesday at 4pm works for us. Alternatively, would Thursday at 11am work for you? We will actually be at the school in the morning for a bid walk, so it would be great if we could swing by City Hall immediately after that.

Please let us know which is better for you.

Thanks,
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-6281 | 28-134-06

From: Steve Itagaki [<mailto:sitagaki@sogate.org>]
Sent: Thursday, October 22, 2015 4:09 PM
To: Paek, Edward; Brian Marchetti
Cc: Godek, Gwenn; Hany Henein; Clint Herrera
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hello Ed,

I got your voice message. We have the following available dates/times to meet with you here at City Hall:

- Tuesday, Oct. 27 at 4:00 pm
- Thursday, Oct. 29 at 4:00 pm

Please let me know which date works best for you. Also, note that the focus of this discussion is to discuss the scoping for the traffic study.

Thanks.

Steven Itagaki, PE, TE, PTOE
Traffic Engineer
City of South Gate
(323) 563-9578
sitagaki@sogate.org

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Tuesday, October 20, 2015 9:43 AM
To: Steve Itagaki; Brian Marchetti
Cc: Godek, Gwenn; Hany Henein
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Good morning Steve,

Just checking into see if you were able to set something up with staff. Please let us know.

Thanks!

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-6281 | 28-134-06

From: Steve Itagaki [<mailto:sitagaki@sogate.org>]
Sent: Tuesday, October 13, 2015 7:07 AM
To: Brian Marchetti
Cc: Paek, Edward; Godek, Gwenn; Hany Henein
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hi Brian,

I will need to check with staff availability as well. I'll get back to you. Thanks.

Steve

From: Brian Marchetti [<mailto:bmarchetti@koacorp.com>]
Sent: Thursday, October 08, 2015 8:51 AM
To: Steve Itagaki
Cc: edward.paek@lausd.net; Gwenn Godek (gwenn.godek@lausd.net); Hany Henein
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Good morning, Steve –

Could you let us know your availability for a meeting to discuss this LAUSD project at City Hall? We would like to go through the study area, with your added locations, and see if there are any outstanding issues we can define at this point to incorporate into the study.

With the understanding that you are there on Tuesdays and Thursdays, what is your availability on Tuesday 10/13 or Thursday 10/15?

I am also verifying dates with LAUSD through this email as well, so this could change.

Thanks very much.

Brian Marchetti
KOA Corporation
(323) 859-3129
bmarchetti@koacorp.com

From: Steve Itagaki [<mailto:sitagaki@sogate.org>]
Sent: Wednesday, September 30, 2015 10:17 AM
To: Brian Marchetti
Cc: edward.paek@lausd.net; Gwenn Godek (gwenn.godek@lausd.net); Hany Henein
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hi Brian,

The scoping document appears acceptable. However, I need to mention that it may be premature for us to clearly define your scoping document since Public Works has not determined the conditions which can affect the scope of the study. One discussion item is to include the new intersections surrounding the proposed site. The traffic impacts with the Legacy High School will need to be addressed. You may also want to include the intersection of Atlantic/Abbott. Thanks.

Steve

From: Brian Marchetti [<mailto:bmarchetti@koacorp.com>]
Sent: Tuesday, September 29, 2015 5:33 PM
To: Steve Itagaki
Cc: edward.paek@lausd.net; Gwenn Godek (gwenn.godek@lausd.net)
Subject: RE: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hello, Steve –

Could you provide an update on the review status for the traffic scoping document on the International Learning Center Addition Project.
We wanted to know if a meeting should/could be scheduled at this point, to get the City up to speed on this project and review the document details.

Thanks very much.

Brian Marchetti
KOA Corporation
(323) 859-3129
bmarchetti@koacorp.com

From: Brian Marchetti
Sent: Monday, September 14, 2015 4:26 PM
To: Steve Itagaki (sitagaki@sogate.org)
Cc: Mengzhao Hu (mhu@koacorp.com); cvelasquez@koacorp.com; edward.paek@lausd.net; Gwenn Godek (gwenn.godek@lausd.net)
Subject: Traffic Study Scoping Document - LAUSD International Learning Center Addition Project (Tweedy Blvd.)

Hello, Steven –

Attached is a scoping document for another project traffic study. Mengzhao Hu here at the office and I have been corresponding with you on a traffic scoping document for a mixed-use project on Paramount Boulevard at the south end of the City.

This is an LAUSD project at the east end of Tweedy, south of the existing school. Let me know what comments or questions you have after you review. We would like to get the City to generally sign-off on our approach and study area, based on this document, after we have discussed and have finalized the scoping document.

We can set up a meeting with you, KOA and LAUSD to review the project and discuss the path forward for the traffic study, if that would be helpful to the process.

Thanks very much!

Brian A. Marchetti, AICP
VP/Senior Transportation Planner

KOA Corporation

1100 Corporate Center Dr., Suite 201
Monterey Park, CA 91754
t: 323.260.4703
d: 323.859.3129
f: 323.260.4705

STAY CONNECTED WITH KOA



www.koacorporation.com

Los Angeles Unified School District

Office of Environmental Health and Safety

MICHELLE KING
Superintendent of Schools

THELMA MELÉNDEZ, PH.D.
Chief Executive Officer, Office of Educational Services

ROBERT LAUGHTON
Director, Environmental Health and Safety

CARLOS A. TORRES
Deputy Director, Environmental Health and Safety

International Studies Learning Center

**City of South Gate
Traffic Study Update
Tuesday, April 19, 2016
2:00 pm**

Meeting Minutes

Attendees: Clint Herrera (SG), Steve Itagaki (SG), Gwenn Godek (LAUSD), Ed Paek (LAUSD), Brian Marchetti (KOA), Carlos Velasquez (KOA)

- Discussed options for addressing impact to intersection of Atlantic and Chakemco include configuration changes, controls and or access restrictions, such as:
 - Making Chakemco a one-way street
 - Likely to create new impact (at Tweedy)
 - Making Chakemco a cul-de-sac
 - Also likely to create new impact with autos and trucks at Tweedy and Aldrich (latter with low capacity)
 - Making Wright a cul-de-sac
 - Would not address impact at Atlantic/Chakemco
 - Full signalization of intersection - allowing left hand turns out of Chakemco
 - Would require tearing up median and could create other impacts.
 - Half signalization of intersection - right hand turns only out of Atlantic/Chakemco
 - This is the mitigation measure preferred by the City, although queing could be an issue
 - Requires a warrant analysis
 - Would require synchronization with the existing signals at Tweedy/Atlantic and Michigan/Atlantic
 - The traffic study should mention the other mitigation options and state how they were determined to be infeasible.
- The City also asked whether staggering start times is an option.
 - LAUSD indicated that this has been done at other schools, however it requires coordination with principals, local district folks, unions, school ops etc.
 - Typically the start time only varies by 15 minutes.
 - KOA indicated that we would have to move the start time for one of the schools out of the am peak period in order to make a significant difference (i.e., shift it by about one hour, not just 15 mins).

- LAUSD asked whether allowing access to the site from the north is an option.
 - The City has denied this request in the past due to resulting impacts to the residences along Wood Avenue and other local roadways in that neighborhood.

- The City requested a follow up meeting in the first week of May to discuss the results of the additional traffic analysis and bring their Planning & Development staff into the conversation.
 - There is a large, vacant property across Atlantic, and although the entitlement process has stalled out at the moment, it is likely to have a large development going up on it in the not too distant future.
 - Access would be primarily from the northbound turn pocket on Atlantic and Tweedy.

Los Angeles Unified School District

Office of Environmental Health and Safety

MICHELE KING
Superintendent of Schools

THELMA MELÉNDEZ, PH.D.
Chief Executive Officer, Office of Educational Services

ROBERT LAUGHTON
Director, Environmental Health and Safety

CARLOS A. TORRES
Deputy Director, Environmental Health and Safety

International Studies Learning Center

City of South Gate
Traffic Study Update
Tuesday, May 17, 2016
3:30 pm

Meeting Minutes

Attendees: Clint Herrera (SG), Steve Itagaki (SG), Issam Dahdul (LAUSD), Gwenn Godek (LAUSD), Ed Paek (LAUSD), Brian Marchetti (KOA)

- Discussed half signalization of intersection at Atlantic and Chakemco to mitigate potential impacts
 - KOA determined that implementation of this mitigation measure would reduce impacts to less than significant level.
 - City agreed that this is the preferred mitigation measure.
 - Would require synchronization with the existing signals at Tweedy/Atlantic and Michigan/Atlantic
 - Coordinate future dedications with development project proposed at SWC of Tweedy/Atlantic
 - **UPDATE (6/13/16) – District/KOA to prepare concept design for proposed signalization. Will share with the City once completed.**
- Follow up regarding mixed-use project on vacant property across Atlantic.
 - Planning staff confirmed that access to the site would be from the existing northbound left turn pocket on Atlantic across from Wright Rd.
 - Included in the traffic study as a cumulative project, based on the best information held by the City at the time.
- Opening Adella Avenue pedestrian entrance to Legacy HS
 - City is willing to discuss opening this pedestrian entrance for neighborhood kids, possibly as a pilot program.
 - District to provide recommendations on how this has worked at other schools
 - **UPDATE (6/13/16) – After speaking with LAUSD Environmental Safety Staff, the school has several tools to ensure that only neighborhood students walking to school would use that entrance. They do recommend that crosswalks be installed at the west and east legs of the intersection of Adella and Wood. The District would also undertake a notification program to remind parents that vehicular drop-offs at that location are not permitted. The dedicated LAUSD school police officer assigned to Legacy HS has citation-authority and would be able to provide as-needed traffic enforcement.**

Paek, Edward

From: Paek, Edward
Sent: Monday, December 12, 2016 1:50 PM
To: 'Clint Herrera'
Cc: 'Steve Itagaki'; Dahdul, Issam; GODEK, GWENN; 'Brian Marchetti'; 'Jessica Kirchner Flores'; 'Gladis Deras'
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Thanks again for meeting with us last week. Just to recap what we discussed:

- The traffic study prepared by KOA identified a potentially significant impact at Atlantic/Chakemco.
 - In order to mitigate that impact, KOA designed a conceptual signalization plan that would require multiple signals, signage, striping, and curb ramps.
 - The proposed signalization plan would also require acquisition of some private right-of-way for an ADA-compliant curb ramp on the corner of Chakemco and Atlantic.
 - LAUSD does not have the authority to use bond money to acquire property on behalf of another public agency.
 - As LAUSD does not have jurisdiction to unilaterally implement the signalization plan and has no way to guarantee that these improvements would be constructed prior to opening the ISLC campus, the EIR will state that the traffic impact would remain significant and unavoidable with mitigation.
 - However, outside of the CEQA process, LAUSD will enter into a Memorandum of Understanding (MOU) with the City of South Gate which will commit LAUSD to implementing the signalization plan.
 - The LAUSD Board of Education will need to take a statement of overriding considerations if it chooses to certify the EIR.

Action items:

- LAUSD will provide the City with an advance copy of the EIR before it is released for public review. LAUSD will add two weeks into the overall CEQA schedule to accommodate the City's preliminary review prior to putting the EIR on the street.
- LAUSD will provide the City with a draft MOU.

Please let us know if you have any comments or questions.

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Paek, Edward
Sent: Tuesday, December 06, 2016 1:30 PM
To: 'Clint Herrera'
Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Gladis Deras
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Works for us. We'll see you there on Thursday at 4pm.

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional

LAUSD | Office of Environmental Health & Safety

O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Tuesday, December 06, 2016 12:35 PM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

How about 4pm?

Clint Herrera, P.E. | Assistant City Engineer | City of South Gate | Office: 323-563-9582

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Tuesday, December 06, 2016 12:29 PM

To: Clint Herrera

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Thanks for getting back to us. Unfortunately, I already have some meetings schedule for tomorrow afternoon. How about Thurs afternoon?

Ed

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional

LAUSD | Office of Environmental Health & Safety

O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Tuesday, December 06, 2016 9:40 AM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Good morning Ed.

How about tomorrow afternoon?

Clint

Clint Herrera, P.E. | Assistant City Engineer | City of South Gate | Office: 323-563-9582

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Tuesday, November 22, 2016 1:37 PM

To: Clint Herrera

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Arturo Cervantes; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Does Tuesday (11/29) or Thursday (12/1) afternoon work for you?

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Tuesday, November 22, 2016 12:12 PM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Arturo Cervantes; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hi Ed,

No worries. Yes, we can definitely schedule a meeting after Thanksgiving.

Clint

Clint Herrera, P.E. | Assistant City Engineer | City of South Gate | Office: 323-563-9582

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Monday, November 21, 2016 2:14 PM

To: Clint Herrera

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Arturo Cervantes; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hi Clint,

Sorry for the delayed response – I was waiting for feedback from the rest of our team. We definitely understand the City's concerns. Is it possible for us to meet again to discuss further? Maybe sometime the week after Thanksgiving?

Ed

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Wednesday, November 09, 2016 5:25 PM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores; Arturo Cervantes; Gladis Deras

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Good afternoon Ed,

As a follow up to our phone conversation last week, the LAUSD International Learning Center has been discussed internally and upon further review of the traffic report, the proposed project will generate a significant amount of trips

and traffic impacts to the project area and as such, these impacts will need to be evaluated and mitigated as part of this project. The traffic study identified the installation of a new traffic signal at the intersection of Atlantic and Chakemco as a mitigation measure but based on our last conversation, LAUSD is considering not implementing such improvements. The City is concerned with such action since not addressing the issue will only create an undesirable condition for our residents and motorist. We already receive numerous complaints from residents about the issues with existing traffic congestion from the school. We received more concerns at a joint meeting with LAUSD about how the new school would exacerbate the traffic congestions issues. There was a commitment to ensure impacts are mitigated. At this point, we don't see an option but implementation of the traffic signal. Not addressing this traffic impact is not an option.

We appreciate your continued cooperation and look forward to working with you on this project.

Clint

Clint Herrera, P.E. | Assistant City Engineer | City of South Gate | Office: 323-563-9582

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Tuesday, November 01, 2016 8:40 AM

To: Clint Herrera

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hi Clint,

Hope all is well. Just checking in to see if you had a chance to discuss the traffic mitigation scenario with your team at the City and had any comments. As we mentioned to you at our last meeting, we are planning to release the EIR for public review later this month, so any feedback would be very helpful to us sooner than later.

We would be happy to discuss over the phone or in person if that's easier.

Thanks,
Ed

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Monday, October 03, 2016 4:02 PM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hi Ed,

How about a meeting next Tuesday afternoon.

Clint

Clint Herrera, P.E. | Assistant City Engineer | City of South Gate | Office: 323-563-9582

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Wednesday, September 28, 2016 8:55 AM
To: Clint Herrera
Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti; Jessica Kirchner Flores
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hi Clint,

Just following up again. Are you available to meet next Tues or Thurs?

Also, is there a contact in Planning you can refer us to? Our consultant has some questions regarding the City's noise standards and we haven't been able to get a response.

Thanks,
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3
Please note new phone number and location

From: Paek, Edward
Sent: Tuesday, September 27, 2016 12:20 PM
To: 'Clint Herrera'
Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Thanks. I'm in all day.

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3
Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]
Sent: Monday, September 26, 2016 3:32 PM
To: Paek, Edward
Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Brian Marchetti
Subject: Re: Revised Scoping Document - LAUSD International Learning Center

Hi Ed,
I'll give you a call tomorrow to schedule a meeting.

Clint

Sent from my iPhone

On Sep 12, 2016, at 4:25 PM, Paek, Edward <edward.paek@lausd.net> wrote:

Clint/Steve,

We'd like to meet with you to discuss our findings on the traffic mitigation we had discussed at Wright/Chakemco. Are you available this Thurs afternoon or next Tue/Thurs?

Thanks,
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3
Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]
Sent: Monday, August 08, 2016 7:11 PM
To: Paek, Edward
Cc: Steve Itagaki; Dahdul, Issam; GODEK, GWENN; Arturo Cervantes
Subject: Revised Scoping Document - LAUSD International Learning Center

Good evening Ed,

Please find attached the City's comment letter. Original to follow by mail.

Thanks

Clint

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Tuesday, July 12, 2016 1:23 PM
To: Clint Herrera
Cc: Steve Itagaki; DAHDUL, ISSAM T; GODEK, GWENN
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hello Clint/Steve,

Hope all is well. In case you didn't receive the Notice of Preparation last week, just wanted to let you know that the Initial Study is available for agency and public review. Comments are due by August 8.

We will also be having a CEQA scoping meeting tomorrow evening at the Legacy High School Multipurpose Room at 6:00pm.

The NOP and IS can be found on our website: <http://achieve.lausd.net/ceqa>

We look forward to any comments or feedback from the City.
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-225-3
Please note new phone number and location

From: Paek, Edward
Sent: Thursday, June 16, 2016 3:10 PM
To: 'Clint Herrera'
Cc: 'Steve Itagaki'; Dahdul, Issam; Godek, Gwenn; 'Brian Marchetti'; 'Carlos Velasquez'
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Clint/Steve – Have you had a chance to review the draft traffic study yet? And did you have any comments or questions?

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Paek, Edward
Sent: Wednesday, June 15, 2016 3:08 PM
To: 'Clint Herrera'
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Hello all,

Sorry for the delay, but here are some minutes from our last meeting. I included some input I received from our Safety folks regarding the possibility of opening up the pedestrian entrance at Adella Ave. Please let me know if you need something more specific to keep that dialogue open.

Also as an update, we are planning to release the CEQA Notice of Preparation and Initial Study for public review in the next few weeks. The Scoping Meeting is scheduled for Wednesday, July 13 at 6pm.

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]
Sent: Thursday, May 19, 2016 2:29 PM
To: Paek, Edward
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Thanks

Clint

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Thursday, May 19, 2016 1:56 PM
To: Clint Herrera
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Clint/Steve,

Thanks again for meeting with us this past Tuesday. Attached is the Draft Traffic Study in pdf form. Please let us know if you have any questions, comments, or concerns.

We will also provide you with some materials on pilot drop-off/pick-up zone programs we have done at other schools.

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Paek, Edward
Sent: Tuesday, May 17, 2016 11:34 AM
To: 'Clint Herrera'
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Clint, 3:30pm works for us. See you then.

Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]
Sent: Monday, May 09, 2016 9:54 AM
To: Paek, Edward
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Good morning Ed,

I'm out of the office this Thursday. How about next Tuesday, in the afternoon?

Clint

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Wednesday, April 27, 2016 1:09 PM
To: Clint Herrera

Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Clint and Steve,

Thanks again for meeting with us the other week. I have attached meeting minutes from our discussion. Please let me know if you have any comments or corrections.

As we discussed, we'd like to have a follow-up meeting next week with you and Planning to discuss the updated traffic study based on the mitigation we agreed upon. Does next Thursday 5/5 at 3pm work for you? If not, please let us know what works.

Thanks,
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]
Sent: Tuesday, April 19, 2016 10:43 AM
To: Paek, Edward
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Ed,

Sorry, I'm not available Thursday at 2pm.

Clint

Clint C. Herrera, P.E
Assistant City Engineer

From: Paek, Edward [<mailto:edward.paek@lausd.net>]
Sent: Tuesday, April 19, 2016 9:57 AM
To: Clint Herrera
Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti; Carlos Velasquez
Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Good morning Clint and Steve,

Sorry for the last minute change, but would it be possible to reschedule our meeting to this Thursday at 2pm?

If not, no worries. We can still meet today at 2pm.

Please let us know. Thanks.

Ed

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Thursday, April 14, 2016 1:08 PM

To: Paek, Edward

Cc: Steve Itagaki; Dahdul, Issam; Godek, Gwenn; Brian Marchetti

Subject: Re: Revised Scoping Document - LAUSD International Learning Center

Sounds good

Clint

Sent from my iPhone

On Apr 14, 2016, at 1:05 PM, Paek, Edward <edward.paek@lausd.net> wrote:

That works for us. Does 2pm sound good?

Ed

Edward S. Paek, AICP

CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6

Please note new phone number and location

From: Clint Herrera [<mailto:cherrera@sogate.org>]

Sent: Thursday, April 14, 2016 12:13 PM

To: Paek, Edward; Steve Itagaki

Cc: Dahdul, Issam; Godek, Gwenn; Brian Marchetti

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

How about Tuesday afternoon, April 19?

Clint C. Herrera, P.E

Assistant City Engineer

From: Paek, Edward [<mailto:edward.paek@lausd.net>]

Sent: Thursday, April 07, 2016 2:29 PM

To: Steve Itagaki; Clint Herrera

Cc: Dahdul, Issam; Godek, Gwenn; Brian Marchetti

Subject: RE: Revised Scoping Document - LAUSD International Learning Center

Good afternoon Steve and Clint,

We would like to meet with you to share some of the preliminary findings from the traffic study, as well as discuss some possible mitigation measures. Are you available to meet next week?

Thanks,
Ed

Edward S. Paek, AICP
CEQA Project Manager | Contract Professional
LAUSD | Office of Environmental Health & Safety
O: (213) 241-4676 | 21-223-6
Please note new phone number and location

From: Brian Marchetti [<mailto:bmarchetti@koacorp.com>]
Sent: Friday, November 13, 2015 9:39 AM
To: Steve Itagaki; Hany Henein; Clint Herrera
Cc: Dahdul, Issam; Paek, Edward; Godek, Gwenn
Subject: Revised Scoping Document - LAUSD International Learning Center

Attached is the updated scoping document for the LAUSD International Studies LC project.
This incorporates the comments and discussion from the 10/27 meeting, regarding the study intersections and the access.

Counts are being conducted at the designated locations.

Thank you.

Brian A. Marchetti, AICP
VP/Senior Transportation Planner

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