

September 2019 | Response to Comments
State Clearinghouse No. 2019069028

RISE KOHYANG HIGH SCHOOL

Prepared for:

LEAD AGENCY: Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
Contact: Eimon Smith, CEQA Project Manager

APPLICANT: Bright Star Schools
600 S. La Fayette Park Place
Los Angeles, California 90057
Contact: Elijah Sugay, Vice President, Finance & Facilities

Prepared by:

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



Table of Contents

Section	Page
1. INTRODUCTION.....	1
1.1 INTRODUCTION.....	1
1.2 PUBLIC ENGAGEMENT.....	1
1.3 DOCUMENT FORMAT	2
1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	2
2. RESPONSE TO COMMENTS	5

Table of Contents

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1. Introduction

1.1 INTRODUCTION

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

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

1.2 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration. Per CEQA Guidelines Section 15072 and 15073, the LAUSD determined that an MND would be required for this proposed Project and circulated a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) and the MND. The public review period for this CEQA document was from June 10, 2019, to July 10, 2019. Public outreach for the MND included the following methods.

Newspaper Publications

- NOI published in the legal announcement section of the *Daily News* (English) on June 10, 2019.
- NOI published in the legal announcement section of the *La Opinión* (Spanish) on June 10, 2019.

U.S. Postal Mail

- NOI sent to addresses within 0.25 mile of project site—379 owner/occupant mailings

Overnight and Certified Mail

- NOI sent to 4 local agencies and 6 Native American tribes.
- NOI and MND sent to the South Coast Air Quality Management District and the Office of Planning and Research, State Clearinghouse, for distribution to 15 state agencies.

Document Availability

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

1. Introduction

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
- Rise Kohyang High School, 600 South La Fayette Park Place, 2nd Floor, Los Angeles, CA 90057
- Felipe de Neve Branch Library, 2820 West 6th Street, Los Angeles, CA 90057
- Wilshire Branch Library, 149 North Saint Andrews Place, Los Angeles, CA 90004
- LAUSD website at: <http://achieve.lausd.net/ceqa>
- Bright Star Schools website at: <https://brightstarschools.org/District/News/8534-Public-Meeting-for-RKHS.html>

Community Outreach

Bright Star Schools (BSS) and its representative Pacific Charter Schools Development (PCSD) conducted additional outreach—meetings with City of Los Angeles Council, District 13, representatives (Planning Deputy and Planning Director); Rampart Village Neighborhood Council; Los Angeles Police Department; and Los Angeles Eco-Village Intentional Community. Community meeting flyers were posted at Felipe de Neve Library, Mexican Village, and Saint Anne’s Hospital.

A community meeting was held on June 17, 2019, at the Rise Kohyang Middle School at 6:00 PM. The meeting provided agencies and the public with an opportunity to comment on the proposed Project and the MND.

1.3 DOCUMENT FORMAT

This document is organized as follows:

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

Section 2, *Response to Comments*. This section provides a list of agencies, organizations, and interested persons that commented on the MND; comment letters received during the public review period; and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a letter. Individual comments in each letter are numbered, and each letter is followed by responses, with reference to the corresponding comment number.

1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

1. Introduction

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

Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

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

1. Introduction

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2. Response to Comments

This section has the written comments received on the circulated MND and LAUSD's response to each comment. Many of these comments do not address the adequacy of the CEQA document; however, the District has still responded.

Comment Reference	Commenting Person / Agency	Date of Comment	Page Number
A	Israel Cruz	Submitted at June 17, 2019 Community Meeting	7
B	Osman Alagria	Submitted at June 17, 2019 Community Meeting	11
C	Adela Guzman	Submitted at June 17, 2019 Community Meeting	15
D	Jocelyn Cruz	Submitted at June 17, 2019 Community Meeting	19
E	Barbara Solovzang	Submitted at June 17, 2019 Community Meeting	23
F	Shawn Chuo	Submitted at June 17, 2019 Community Meeting	27
G	Gabrieleño Band of Mission Indians-Kizh Nation	June 10, 2019	31
H	South Coast Air Quality Management District	July 3, 2019	35
I	California Department of Transportation	July 2, 2019	39

2. Response to Comments

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2. Response to Comments

COMMENT A – Israel Cruz (1 page)

COMMENT CARD / TARJETA De COMENTARIO

Community Meeting / Reunión Comunidad

Rise Kohyang High School / Escuela Preparatoria Rise Kohyang

June 17, 2019 / 17 de junio de 2019

Name / Nombre: Israel Cruz

Affiliation / Afiliación: _____

Address / Dirección: _____

Comments / Comentarios: _____

Quisiera que "restringen" que no haya Homeless ser-
ca de la escuela. Para que no sean a cosados los
niños y niñas y no huelan los olores que dejan
al orinar. Si lo aprueban quisiera que cuiden "eso"
tambien quisiera que no hubiera cercas de las escuelas
mobile home. por que tiran mucha basura.

A-1

Written comments must be received no later than July 10, 2019 at the following address:

Envia su comentarios antes 10 de julio de 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety

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

Attention: Eimon Smith

English Translation

A-1 I would like there to be restraints in regard to homeless people nearby the school. So that there are no assaults on boys and girls, and so they don't smell the odors that they (the homeless) leave due to (public) urination. If it's approved (the project) I would like that to be taken care of. Also, I would not like there to be mobile homes close to the school as they litter much garbage.

2. Response to Comments

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2. Response to Comments

A. **Response to Comments from Israel Cruz, submitted on June 17, 2019 at the Community Meeting.**

A-1 Concerns about the effects of homeless populations, student safety, mobile homes, and trash are noted.

There are six schools in the local vicinity: Virgil Middle School, Dr. Sammy Lee Medical and Health Sciences Magnet Elementary School, Frank Del Olmo Elementary School, Central City Value High School, Soledad Enrichment Action Charter High School, and Commonwealth Avenue Elementary School, and a significant number of students walk to school from the community.

The Los Angeles Police Department (LAPD) provides police service to the City of Los Angeles, including Rampart Village and the Project site. The site is in LAPD's Olympic Area; the Olympic Area Station is at 1130 South Vermont Avenue, about 1.6 miles to the south.

The LAUSD and Bright Star Schools have no jurisdiction outside the school campus and adjacent sidewalks. General campus activities would be under the direct supervision of the school administrators and staff while classes are in session. Complaints about homeless populations, mobile homes, and trash are handled by the LAPD.

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

2. Response to Comments

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2. Response to Comments

COMMENT B – Osman Alegria (2 sides)

Name / Nombre Osman Alegria

Affiliation

Address / Dirección [REDACTED]

Comment:

mi Preocupación Referente a la construcción de la escuela es Referente al tráfico de los autos cuando lleven los Papas a dejar a sus hijos a la escuela y también como evitarían el ruido a nuestros hogares cuando estén en actividad los alumnos y también cuando este el edificio en construcción y no va a causar efectos de cualquier tipo en nuestros

B-1

B-2

Propiedades, Por favor envíame una Respuesta por escrito de lo mencionado anteriormente y Gracias Por su atención.

B-3

English Translation

- B-1 My concern regarding the construction of the school is traffic of vehicles during drop-off, when parents drop off their children at school.
- B-2 Also, how would you avoid the noise from our homes and neighborhood when the students are in activities and when the building is under construction that it won't cause effects of any sort in our properties.
- B-3 Please send a response to above mentioned concerns and thank you for your attention.

2. Response to Comments

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2. Response to Comments

B. Response to Comments from Osman Alagria, submitted on June 17, 2019 at the Community Meeting.

- B-1 Construction traffic was addressed in Chapter 4, Section XVII, of the environmental document. To avoid conflicts, construction zones, construction staging areas (i.e., storage of equipment and materials), and truck access locations would be fenced. Additionally, BSS's construction contractor will prepare a Construction Worksite Traffic Control Plan prior to start of construction. This plan will establish methods to avoid conflicts between construction traffic and the existing vehicle, pedestrian, and bicycle traffic. The Construction Worksite Traffic Control Plan will include the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties. Also, construction-related traffic would not travel during peak traffic hours or during drop-off and pick-up times at the other nearby schools.
- B-2 The school district cannot guarantee that students and construction will not generate noise. Noise was addressed in Chapter 4, Section XIII, of the environmental document. All feasible measures to reduce construction noise below the Municipal Code standard would be implemented: source controls (e.g., scheduling, equipment restrictions, mufflers, reduced power, noise compliance monitoring), path controls (e.g., temporary noise barriers, noise curtains, enclosures), and receptor controls (e.g., community participation, noise complaint response and communications). Construction would not generate noise in excess of City of Los Angeles Municipal Code standards of 75 dBA Lmax (LAMC Section 112.05). Also, according to LAMC Section 41.40, construction or repair work is only allowed between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturdays or national holidays (not allowed on Sundays). Contractors would comply with City regulations for construction hours.
- B-3 Responses will be sent, and the LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang High School project.

2. Response to Comments

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2. Response to Comments

COMMENT C – Adela Guzman (1 page)

COMMENT CARD / TARJETA De COMENTARIO
Community Meeting / Reunión Comunidad
Rise Kohyang High School / Escuela Preparatoria Rise Kohyang
June 17, 2019 / 17 de junio de 2019

Name / Nombre: Adela Guzman

Affiliation / Afiliación: _____

Address / Dirección: [REDACTED]

Comments / Comentarios: Estoy muy feliz que este proyecto puede pasar. Espero que lo a pueren el proyecto. Mi hija lo va a disfrutar muchisimo!

C-1

Written comments must be received no later than July 10, 2019 at the following address:
Envia su comentarios antes 10 de julio de 2019 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attention: Eimon Smith

English Translation

C-1 I am very happy that this project could realize. I hope that this project is approved. My daughter would much enjoy it!

2. Response to Comments

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2. Response to Comments

C. Response to Comments from Adela Guzman submitted on June 17, 2019 at the Community Meeting.

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

2. Response to Comments

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2. Response to Comments

COMMENT D – Jocelyn Cruz (1 page)

COMMENT CARD / *TARJETA De COMENTARIO*
Community Meeting / Reunión Comunidad
Rise Kohyang High School / *Escuela Preparatoria Rise Kohyang*
June 17, 2019 / *17 de junio de 2019*

Name / Nombre: Jocelyn Cruz

Affiliation / Afiliación:

Address / Dirección: [REDACTED]

Comments / Comentarios:

I am really excited for this project to be approved'. Mainly because I know my brother would have loved to have had a building just for Rise Kohyang.

D-1

Written comments must be received no later than July 10, 2019 at the following address:

Envia su comentarios antes 10 de julio de 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attention: Eimon Smith

2. Response to Comments

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2. Response to Comments

D. Response to Comments from Jocelyn Cruz, submitted on June 17, 2019 at the Community Meeting.

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

2. Response to Comments

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2. Response to Comments

COMMENT E – Barbara Solovzang (1 page)

COMMENT CARD / *TARJETA De COMENTARIO*
Community Meeting / Reunión Comunidad
Rise Kohyang High School / *Escuela Preparatoria Rise Kohyang*
June 17, 2019 / *17 de junio de 2019*

Name / Nombre: Barbara Solovzang

Affiliation / Afiliación: Student Parent

Address / Dirección: _____

Comments / Comentarios: The information was clear and helpful to understand the process for the construction of the High School. It was really educational about the safety precautions that have been taking in order to create a safe environment for the kids.

E-1

Written comments must be received no later than July 10, 2019 at the following address:
Envia su comentarios antes 10 de julio de 2019 a la siguiente dirección:
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attention: Eimon Smith

2. Response to Comments

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2. Response to Comments

E. Response to Comments from Barbara Solovzang, submitted on June 17, 2019 at the Community Meeting.

E-1 Comments about the community meeting are noted. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Rise Kohyang High School project.

2. Response to Comments

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2. Response to Comments

COMMENT F – Shawn Chuo (1 page)

COMMENT CARD / TARJETA De COMENTARIO

Community Meeting / Reunión Comunidad

Rise Kohyang High School / Escuela Preparatoria Rise Kohyang

June 17, 2019 / 17 de junio de 2019

Name / Nombre:

Shawn Chuo

Affiliation / Afiliación:

RKHS

Address / Dirección:

Comments / Comentarios:

We, as a family are excited to look
forward to NEW RKHS building

You have our utmost support for
every part of this plan

F-1

Written comments must be received no later than July 10, 2019 at the following address:

Envía su comentario antes 10 de julio de 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017
Attention: Eimon Smith

2. Response to Comments

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2. Response to Comments

F. Response to Comments from Shawn Choo, submitted on June 17, 2019 at the Community Meeting.

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

2. Response to Comments

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2. Response to Comments

LETTER G – Gabrieleño Band of Mission Indians-Kizh Nation (1 page)

Letter G



GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

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

June 10, 2019

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

Good Morning Bart Doering,

We have received your Notice of Intent to adopt a Negative Declaration for the Rise Kohyang High School Project in the location of the Los Angeles County. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

G-1

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

Andrew Salas, Chairman
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

2. Response to Comments

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2. Response to Comments

F. **Response to Comments from Gabrieleño Band of Mission Indians-Kizh Nation, dated June 10, 2019.**

F-1 The comment letter has one comment: the Band's Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

As discussed in Chapter 4, Section XIX-Tribal Cultural Resources of the Initial Study the Gabrieleño Band of Mission Indians–Kizh Nation requested notification and consultation through the PRC Section 21080.3.1 process on July 15, 2019. LAUSD Office of Environmental Health and Safety (OEHS) staff notified the Tribe about the proposed Project on March 11, 2019. To date the District has not received an AB 52 request to consult from the Tribe. Following the CEQA Notice of Availability comment letter (dated June 10, 2019) from the Tribe, OEHS attempted to set up a meeting; however, the Tribe did not respond.

OEHS and the Tribe completed consultation regarding several other LAUSD Projects with two meetings in early 2019. The result of those consultation meetings was to require standard conditions of approval SC-TCR-1 and SC-TCR-2 to protect potential unanticipated discoveries associated with Tribal Cultural Resources. These conditions were included in the Initial Study and are incorporated into this Project.

All comments will be included as part of the administrative record and made available to the Board of Education for consideration and review prior to a final decision on the proposed Project.

2. Response to Comments

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2. Response to Comments

LETTER H – South Coast Air Quality Management District (2 pages)



SENT VIA E-MAIL AND USPS:

July 3, 2019

CEQA-comments@lausd.net

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

**Mitigated Negative Declaration (MND) for the Proposed
Rise Kohyang High School Project (Bright Star Charter School)**

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

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a new school with a 76,390-square-foot, two-story building containing 24 classrooms on 1.15 acres (Proposed Project). The Proposed Project would have a capacity to accommodate approximately 600 students. The Proposed Project is located at 3500 West 1st Street on the southwest corner of West 1st Street and Madison Avenue in the community of Koreatown. Upon review of Figure 3 in the MND and aerial photographs, South Coast AQMD staff found that residential uses and two schools are adjacent to the Proposed Project¹. Construction is anticipated to occur over 24 months and be completed in August 2022².

South Coast AQMD Staff's Summary of Air Quality Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant. The Lead Agency also included Standard Conditions of Approval for Air Quality (SC-AQ) 2 through SC-AQ-4³ from the Los Angeles Unified School District's (LAUSD) School Upgrade Plan (SUP), which is a programmatic EIR that guides the modernization of certain LAUSD schools, such as the Proposed Project. SC-AQ-2 through SC-AQ-4 include dust control measures, use of construction equipment that meets or exceeds Tier 3 emissions standards or Tier 4 emissions standards for engines between 50 and 750 horsepower, and other general construction mitigation measures⁴.

H-1

Guidance Regarding Siting New School Facilities

The California Public Resources Code 21151.8 and CEQA Guidelines Section 15186 establish special consultation requirements for school projects, which are meant to ensure that lead agencies consult with other agencies, such as the local air district, in order to carefully examine and disclose the potential health impacts that may result from siting a school within one-fourth mile of facilities that may reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Since the Proposed Project involves construction of a new high school, the Proposed Project is

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

² *Ibid.*, Section 3 Project Description, 3.1.6 *Construction*. Page 28.

³ *Ibid.*, Section 4 Environmental Checklist and Analysis. Page 50-52.

⁴ *Ibid.*, Page 45.

2. Response to Comments

Eimon Smith

July 3, 2019

subject to the consultation requirements. South Coast AQMD staff recommends that the Lead Agency review the respective CEQA Guidelines sections and meet the appropriate CEQA requirements, if applicable. For a search of South Coast AQMD permitted facilities pursuant to California Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186, please fill out the "Grid Search Request Form" that is available at: <http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf>.

H-1
Cont'd

Conclusion

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

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

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RD
[LAC190607-04](#)
Control Number

2. Response to Comments

H. Response to Comments from South Coast Air Quality Management District, dated July 3, 2019.

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

Potential health impacts from facilities that emit hazardous emissions or handle hazardous materials were analyzed in the Geologic and Environmental Hazards Assessment Report (August 2018) included as Appendix C of the Initial Study. Based on a review of the South Coast Air Quality Management District's Facility Information Detail database, no significant hazards were identified. Additionally, there are no large agricultural operations or rail yards within a quarter mile of the site. The Hollywood Freeway (U.S. 101) is over 1,700 feet north of the site.

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

2. Response to Comments

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2. Response to Comments

LETTER I – California Department of Transportation (2 pages)

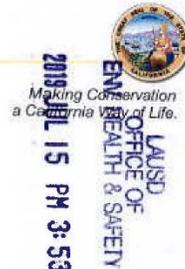
Letter I

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



July 2, 2019

Eimon Smith
Los Angeles Unified School District
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90017

RE: Rise Kohyang High School - Mitigated
Negative Declaration (MND)
SCH # 2019069028
GTS # 07-LA-2019-02558
Vic. LA-101/ PM: 4.213

Dear Mr. Smith:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Mitigated Negative Declaration (MND). The project applicant, Bright Star Schools, is seeking development approval from the Los Angeles Unified School District for the construction and operation of a charter school (Rise Kohyang High School). The new charter high school would have a capacity of 600 students in grades 9-12 and 75 full and part-time teachers and staff. The Project consists of a 76,390-square-foot two-story building with staff space (reception/clerical/administration/teacher offices, meeting rooms), restrooms, support space (custodial, storage, electrical/telecommunications rooms), 24 classrooms, multipurpose room and servery, gymnasium, and semi-subterranean parking garage. The 62-space parking garage would have a designated drop-off/pick-up area and queuing lane. The drop-off/pick-up zone would permit student unloading and loading directly from the passenger side without obstructing the circulation lane.

The nearest State facility to the proposed project is Route 101. After reviewing the MND, Caltrans has the following comments:

- In reference to the **Caltrans Freeway Screening Filter in Appendix F**, please detail on how project trips were calculated for state facilities. In Addition, with numerous proposed projects in the surrounding area, there are possibilities of cumulative impacts on state facilities. Please address both direct and cumulative impacts in your assessment. I-1
- It was stated that the project would not have an additional impact on state facilities near the project area, therefore please provide more detailed analysis on how the proposed project will not add new vehicle trips per hour to the nearest CMP mainline freeway locations, especially at: I-2
 - Interchange between LA-101 and Melrose Ave
 - Interchange between LA-101 and Vermont Ave
 - Interchange between LA-101 and Silver Lake Blvd

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

2. Response to Comments

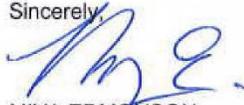
Mr. Smith
July 2, 2019
Page 2 of 2

- When analyzing the affected off-ramps, queuing analysis based on the Highway Capacity Manual (HCM) queuing methodology is required. | I-2 cont.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods to minimize congestion and provide safety to pedestrians and vehicular traffic. | I-3

We look forward to reviewing the EIR that includes more detailed traffic impact analysis of LA-101 based on the comments provided. If you have any questions, please contact project coordinator David Calkins, at david.calkins@dot.ca.gov, and refer to GTS # 07-LA-2019-02558.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

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

2. Response to Comments

I. Response to Comments from California Department of Transportation, dated July 2, 2019.

- I-1 The project-related trips assigned to state facilities used trip generation shown in were calculated according to the trip generation rates shown in Table 5, page 27, and assigned to the circulation system according to distribution patterns shows in Figure 5 of the traffic study (included as Appendix G of the Initial Study). The project trip distribution was based on a review of the addresses of the students currently enrolled at the existing Rise Kohyang High School (operating in classroom space on the first and second floors of a building at 600 S La Fayette Park Place, which is located about 1.2 miles southeast of the site), and a review of the circulation network and routes to/from the site. The majority of project-related trips would be on local roads, not freeway facilities. It is projected that 6 peak hour trips or approximately 0.1-percent of the trips use freeway ramps at Vermont Avenue and Silver Lake Avenue. There would be about 1 trip at Melrose Avenue because this ramp is outside the study area as shown in Figure 5. According to the CMP, a significant impact may result, and a traffic analysis is needed at CMP mainline freeway monitoring locations where a project would add 150 or more vehicle trips, in either direction, during either morning or evening weekday peak hours. The freeway screening filter in Appendix F of the traffic study also shows that the number of trips from to the project in relation to the freeway capacity. As project trips to the freeway system would be negligible, they would not be considerable directly, or cumulatively.
- I-2 As stated in response I-1 above, the majority of trips to/from the site would be on local roads, not freeway facilities. Appendix F of the traffic study shows that about 6 peak hour trips at the US 101 interchanges, which is negligible and does not meet the impact criteria per LADOT's screening filter criteria and well below the CMP significance criteria for freeway facilities. Given the project would add 0.1-percent to the volumes at the off-ramps, any increase in traffic to the ramps would be negligible and therefore not require a queuing analysis.
- I-3 Comment noted. LAUSD will comply with permit requirements for State highways. Additionally, LAUSD has Standard Conditions of Approval that requires that construction activities that affect traffic flow are restricted to off-peak hours (e.g. between 10:00 AM and 3:00 PM).

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