



March 2024 | Response to Comments

CANOGA PARK SENIOR HIGH SCHOOL

Major Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
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1. Introduction

1.1 CANOGA PARK SENIOR HIGH SCHOOL MAJOR MODERNIZATION PROJECT

The Los Angeles Unified School District (LAUSD or District) proposes to complete a major modernization project at the Canoga Park Senior High School Campus (campus) to provide facilities that are safe, secure, and aligned with the instructional program (proposed Project or Project). The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the campus through building replacement, renovation, and modernization. The proposed Project would construct new facilities, including a two-story Food Services/Classroom Building with twelve classrooms and associated support spaces, food services, and student store; a new lunch shelter; a one-story Maintenance & Operations Building; and new covered walkways. The proposed Project also includes upgrades to the existing football field and running track to include replacing the existing dirt running track with a synthetic system, new natural grass field with irrigation, upgrades to the track features within the field, repairs to the bleachers, new home and visitors' restrooms and concessions, and a new scoreboard. The proposed Project also includes exterior painting for all remaining buildings and structures at the school, voluntary barrier removal, and infrastructure upgrades to ensure compliance with the Americans with Disabilities Act. The proposed Project would maintain the school's current capacity and total number of classrooms (78 classrooms).

The proposed Project includes the demolition of four permanent buildings (Cafeteria Building/Lunch Pavilion including attached covered walkway, Shop Building #1, Classroom Building #5, and Parent Center Building), seven relocatable classroom buildings, three restroom buildings, stadium ticket booth, existing running track, existing football field and irrigation, existing scoreboard, and miscellaneous storage buildings. Interim facilities will be installed to allow the school to remain operational and minimize impact during construction.

The proposed Project also includes utility upgrades; a new parking lot; new hardcourt play areas with striping and equipment; new outdoor learning environments; the removal and replacement of trees; landscaping and irrigation; hardscaping; fencing, gates, and site furnishings.

1.2 INITIAL STUDY/NEGATIVE DECLARATION

An Initial Study (IS) was prepared for the proposed Project and concluded that there will be less-than-significant impacts on the environment with the incorporation of LAUSD's standard conditions of approval; therefore, a negative declaration (ND) was prepared for the proposed Project. Based on the information in the IS/ND, the proposed Project would not result in any potentially significant environmental impacts, and no mitigation measures would be required. This document includes the public comments received on the IS/ND as well as LAUSD's responses to those comments.

1. Introduction

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 IS/ND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the IS/ND. In the spirit of public disclosure and engagement, LAUSD—as the lead agency for the proposed Project—has responded to all written and verbal comments submitted during the public review period.

1.3 RESPONSE TO COMMENTS DOCUMENT FORMAT

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and content of this document. Additionally, this section describes the public engagement and community outreach that was conducted for the proposed Project.

Section 2, Response to Comments. This section provides a list of agencies and interested persons who commented on the IS/ND, copies of comment letters received during the public review period, summary of verbal comments, and individual responses to written and verbal comments. References to “verbal comments,” as used herein, refers to verbal comments provided at the community meeting on February 29, 2024. To facilitate review comment letters have been reproduced and assigned a number, A1 and A2, and verbal comments are labeled as G1 through G3. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments on NDs 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.

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

CEQA Guidelines 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.”



1. Introduction

1.5 PUBLIC ENGAGEMENT

1.5.1 Notice of Intent to Adopt a Negative Declaration

Per CEQA Guidelines Sections 15072 and 15073, after preparation of an IS, the District determined that an ND would be appropriate for the Project and circulated a Notice of Intent (NOI) to Adopt an ND. The 30-day public review period for the IS/ND was from February 15, 2024, to March 15, 2024, per CEQA Guidelines Section 15073(a). Public notification of the IS/ND included the following methods.

- NOI sent to addresses within 0.25 mile of the campus—985 owner/occupant mailings.
- NOI sent to parents/guardians of all Canoga Park Senior High School students.
- NOI sent to parents/guardians of all Owensmouth Continuation High School students.
- NOI sent to 19 State and local agencies and 20 Native American tribes.
- NOI published in the legal announcement section of *The Daily News* (English) on February 15, 2024.
- NOI published in the legal announcement section of *La Opinión* (Spanish) on February 15, 2024.
- NOI published in the legal announcement section of *Valley Vantage* (English) on February 16, 2024.

1.5.2 Document Availability

The NOI, IS/ND, and supporting documents for the proposed Project are available for review at the following locations:

- Los Angeles Unified School District, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3199)
- Canoga Park Senior High School (main office), 6850 Topanga Canyon Boulevard, Los Angeles, CA 91303
- Los Angeles Unified School District, Office of Environmental Health and Safety website: <http://www.lausd.org/CEQA>

1.5.3 Community Outreach

A public community meeting was held on February 29, 2023, during the 30-day public comment period, at the Canoga Park Senior High School campus to provide information about the Project and receive comments on the IS/ND. The public community meeting was noticed in the NOI as distributed above. The meetings included an overview of the IS/ND and gave families, staff, agencies, organizations, and residents the opportunity to make verbal and written comments on the Project and the IS/ND.

During the public review period two letters were received from public agencies providing comments on the Project and the IS/ND (see Table 1, *IS/ND Comments Received*). Summaries and responses to the written and verbal comments are in Chapter 2, *Response to Comments*.

1. Introduction

1.6 NEED FOR RECIRCULATION OF AN IS/ND PRIOR TO ADOPTION

Section 15073.5(a) of the CEQA Guidelines states that a lead agency is required to recirculate an IS/ND if the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation must comply with Sections 15072 and 15073. A “substantial revision” of the IS/ND refers to when:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added to reduce the effect to less than significant.
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant, and new measures or revisions are required.

Recirculation is not required under the following circumstances:

1. Mitigation measures are replaced with equal or more effective measures pursuant to CEQA Guidelines Section 15074.1.
2. New project revisions, which are not new avoidable significant effects, are added in response to written or verbal comments on the project effects identified in the negative declaration.
3. Measures or conditions of project approval are added after circulation of the negative declaration that are not required by CEQA, do not create new significant environmental effects, and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As a result of the comments received the District has determined that no revisions to the IS/ND are necessary and the requirements in CEQA Guidelines Section 15073.5 are not met and that recirculation of the IS/ND is not required. The analysis and conclusions in the IS/ND demonstrate substantial evidence in light of the whole record that the Project would not have a significant effect on the environment.



2. Responses to Comments

This section includes the written comments received on the circulated IS/ND and LAUSD's response to each comment.

Table 1. IS/ND Comments Received

Comment Reference	Commenting Person / Agency	Date of Comment	Page Number
Agency Comments			
A1	Tamara Purvis, Department of Toxic Substances Control	March 6, 2024	6
A2	Miya Edmonson, California Department of Transportation	March 15, 2024	13
General Public Comments			
G1	Audience Member No. 1	February 29, 2024	19
G2	Audience Member No. 2	February 29, 2024	20
G3	Audience Member No. 3	February 29, 2024	21

2. Responses to Comments

COMMENT LETTER A1 – Tamara Purvis, Department of Toxic Substances Control (4 pages)



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Gavin Newsom
Governor

Comment Letter A1

SENT VIA ELECTRONIC MAIL

March 6, 2024

Edward Paek
Senior CEQA Project Manager
Los Angeles Unified School District
333 South Beaudry Avenue 21st Floor
Los Angeles, CA 90017
edward.paek@lausd.net

RE: NEGATIVE DECLARATION (NEG DEC) FOR THE CANOGA PARK HIGH SCHOOL MAJOR MODERNIZATION, DATED FEBRUARY 15, 2024 STATE CLEARINGHOUSE # [2024020612](#)

Dear Edward Paek,

The Department of Toxic Substances Control (DTSC) received a Neg Dec for the Canoga Park High School Major Modernization project (Project). The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the campus through building replacement, renovation, modernization, and reconfiguration on the campus to provide facilities that are safe, secure, and better aligned with the current instructional program. The proposed Project will include the demolition and removal of the cafeteria building, weight room, seven classroom buildings (containing a total of 12 classrooms), two storage buildings, three restroom/multipurpose buildings, and one ticket booth. The Project will construct one student union building containing a new cafeteria, 12 classrooms, a weight room, a

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coach's office, special education support spaces, a Wellness Center for students, and one athletic field support building containing event ticketing, home concessions, and restrooms. The proposed Project includes new exterior paint for all remaining existing buildings, new sod and track surfacing for the primary athletic field, new hardscaping and landscaping for the central promenade and the existing student quads, around the new student union building to create outdoor learning spaces, resurfacing or replacement of other existing hardscape, and new irrigation systems for landscaping and the athletic field. Based on our review, DTSC requests consideration of the following comments.

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), [§17210](#), [§17213.1](#), and [§17213.2](#), unless otherwise specifically exempted under section [§17268](#). If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section [§17268](#), DTSC recommends the district continue to investigate, clean up the Site under the oversight of Los Angeles County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the [Office of Public-School Consultation](#) webpage.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. The Initial Study/Negative Declaration states, "A total of 12 classrooms would be demolished as part of the Project and this same number would be constructed, leaving the number of classrooms unchanged at 78." If planned activities include building modifications/demolitions, surveys should be conducted for the presence of lead-based paints or

A1-1

A1-2

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products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment and sampling near current and/or former buildings should be conducted in accordance with DTSC's [Update to June 2006 Phase I Addendum Guidance](#).

3. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.

4. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material meets screening levels for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, future environmental documents should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.



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DTSC appreciates the opportunity to comment on the Neg Dec for the Canoga Park High School Major Modernization project. If you would like to proceed with DTSC's school environmental review process, please visit [DTSC's Evaluating & Clean-up School 3-Step Process](#) to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Tamara Purvis
Associate Environmental Planner
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

2. Responses to Comments

A1. **Response to Comments from Tamara Purvis, Department of Toxic Substances Control (DTSC), submitted via email on December 4, 2023.**

A1-1 This comment states that the District should comply with the requirements of the Education Code if funding from the California Department of Education (CDE) is obtained for the proposed Project.

Education Code Sections 17210, 17213.1, and 17213.2 require a district to perform a Phase I ESA for project work receiving state funds and details other, similar responsibilities. As explained in Section IX, *Hazards and Hazardous Materials*, of the IS/ND a Phase I and Phase II ESA were produced for the Project site and an Asbestos Report and Soil Management Plan were prepared in response to the findings of the ESAs. These reports reflect compliance with the requirements of SC-HAZ-4 which implements applicable federal, state, and local hazardous waste investigation, discovery, handling, and disposal requirements. Should the District receive state matching funds for the proposed Project it will submit plans to CDE for review and approval and it will be determined at that time if the investigations performed and remedies planned to address hazardous materials on campus are already sufficient according to the DTSC and requirements of the Education Code or if further attention is required.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

A1-2 This comment recommends the Project to perform lead-paint, mercury, asbestos, and PCB surveys prior to demolition.

Such surveys were conducted for the Project as summarized in pages 81-83 of the IS/ND. A Phase I and Phase II ESA were conducted which investigated potential hazardous materials on campus, and an Asbestos Report and Soil Management Plan were prepared in response to the findings of the ESAs. The Phase II ESA took soil samples around the campus and identified approximately 273 cubic yards of soil contaminated by hazardous materials that must be removed, and the Soil Removal Plan was then produced for this purpose. The Asbestos Report investigated buildings and areas for demolition and identified four permanent buildings and four portable buildings as containing asbestos, and six areas where asphalt contains asbestos. The Asbestos Report details procedures for handling the removal of the material. The assessment for PCBs will be conducted just prior to the disturbance of any potential PCB-containing building materials to allow an abatement plan to be prepared, if necessary. Both the Soil Removal Plan and Asbestos Report reiterate the requirements of SC-HAZ-4 which implements applicable federal, state, and local hazardous waste handling requirements.

The comment neither identifies a deficiency in the analysis of hazardous materials contained in the IS/ND or the supporting technical appendices, nor a new potential or exacerbated



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significant environmental impact. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

- A1-3 This comment states that if there are any recognized environmental conditions (RECs) on site that proper investigation, sampling, and remedial actions according to regulatory requirements should be conducted prior to construction.

As detailed in pages 81-83 of the IS/ND the Phase I ESA identified hazardous materials from historic practices on campus as a potential REC that could impact the Project. The Phase II ESA, Asbestos Report, and Soil Management Plan were all prepared to find and address the presence of historic hazardous materials such as lead-paint, and asbestos. The assessment for PCBs will be conducted just prior to the disturbance of any potential PCB-containing building materials to allow an abatement plan to be prepared, if necessary. As detailed in the Hazards & Hazardous materials section of the IS/ND, removal of contaminated soil, contaminated asphalt, and contaminated building materials would be done according to the procedures outlined in the Soil Removal Plan and Asbestos Report which reiterate the provisions required of SC-HAZ-4, which implements the various governing federal, state and local requirements including the California Hazardous Waste Control Law (Title 22, Division 4.5) concerning removal, handling, and disposal of contaminated waste, and SCAQMD permitting for Rule 1466 compliance (dust control). State law, reiterated in SC-HAZ-4 requires all soil excavation and disposal activities to be completed by a properly licensed Remediation Contractor under the oversight of an Environmental Consultant selected by LAUSD's Office of Environmental Health and Safety (OEHS). The OEHS is the District authority which oversees proper handling of hazardous materials.

The comment neither identifies a deficiency in the analysis of hazardous materials contained in the IS/ND or the supporting technical appendices, nor a new potential or exacerbated significant environmental impact. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

- A1-4 This comment recommends that all imported soil and fill material be tested to ensure any contaminants of concern are within approved screening levels for the intended land use. The comment also suggests if contaminated soil and/or groundwater is present on the site that appropriate health and safety procedures should be implemented.

Standard Condition SC-HAZ-4, detailed on pages 80 and 81 of the IS/ND indicates that the construction contractor will comply with District Specification Section 01 4524, Environmental Import / Export Materials Testing. This requires all imported and exported fill materials to be tested at site of origin. This is reiterated in the Project Soil Removal Plan, Appendix H of the IS/ND.

Pages 81 to 83 of the IS/ND explains that the Phase II investigation revealed approximately 273 cubic yards of contaminated soil on site that must be removed and replaced and that contact with groundwater during excavation was unlikely due to the required depth of

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excavation and historic groundwater levels. The Soil Removal Plan was completed to delineate the planning and procedures for removal and disposal of the soil pursuant to the requirements of SC-HAZ-4 which reiterate applicable federal, state, and local hazardous material requirements. The Project will therefore follow all recommendations in this comment.

The comment neither identifies a deficiency in the analysis of hazardous materials contained in the IS/ND or the supporting technical appendices, nor a new potential or exacerbated significant environmental impact. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

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COMMENT LETTER A2 – Miya Edmonson, California Department of Transportation (3 pages)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 266-3562
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life*

Comment Letter A2

March 15, 2024

Julian Capata
Los Angeles Unified School District Office of Environmental Health and Safety
333 S. Beaudry Ave, 21st Floor
Los Angeles, CA 90017

RE: Canoga Park High School Major
Modernization Negative Declaration
(ND)
SCH # 2024020612
GTS # 07-LA-2024-04457
Vic. LA-27/14.172

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed Project is designed to address the most critical physical concerns of the buildings and grounds at the campus through building replacement, renovation, modernization, and reconfiguration on the campus to provide facilities that are safe, secure, and better aligned with the current instructional program. The Los Angeles Unified School District Office of Environmental Health and Safety is the Lead Agency under the California Environmental Quality Act (CEQA).

The closest state facility is SR-27. After reviewing the project's ND, Caltrans has the following comments:

- The city's determination that this project is presumed to have less than significant VMT impact is consistent with the OPR SB 743 Technical Advisory's recommendation. Caltrans is in support of this project that helps achieve state planning priorities contained in state law and meets state policy goals on transportation, VMT reduction, GHG emissions reduction, and/or betterment of the environment and human health. A2-1
- Due to the project's proximity to SR-27 (Topanga Canyon Blvd.), a Caltrans encroachment permit may be needed for any landscape work and SR-27 improvements that intersect along Bassett St. and Vanowen St. A2-2
- According to the Los Angeles Unified School District: Standard Conditions of Approval T-3 (LAUSD: SC-T-3) of the Initial Study, Caltrans expects that a study will be conducted, and the lead agency will ensure that the existing A2-3

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signal and traffic operation on SR-27 and all major intersections can accommodate the additional project trips.

- For any traffic signals and curb ramps upgrade, the Project would be responsible for payment of applicable fees as required related to the transportation system, and Caltrans is not responsible for any fair-share contribution to the improvements.
- Due to the project's proximity to SR-27, Caltrans requests that additional trips and food trucks for workers, on-site and/or off-site parking, equipment/materials delivery, and storage areas do not conflict with Caltrans R/W. Due to the 48-month construction period, Caltrans recommends any closures/realignments to vehicular or pedestrian facilities should consider semi-permanent solutions over temporary ones.
- Caltrans aims to reach zero traffic-related fatalities and serious injuries by 2050 as there is a direct link between impact speeds and the likelihood of fatality or serious injury. To reach this goal, Caltrans expects the Lead Agency to comply with the Safe Routes to School (SR2S) Program, as stated in Section SC-T-3. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles are through physical design and geometrics.
 - These methods include constructing physically separated facilities such as ADA compliance, Class IV bikeways, wide sidewalks, curb extensions, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing.
 - Visual indicators such as pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage, and striping should be used in addition to physical design improvements to indicate to motorists that they can expect to see and yield to people walking or riding bikes.
 - Reduce parking whenever possible. The Canoga Park High School Major Modernization Project is designed in a way that induces demand for unnecessary vehicle trips.
 - If the proposed project results in new sidewalks and intersection improvements, it is expected to reconstruct the sidewalk along property frontage per the latest state standards, as well as to construct ADA curb ramps to meet the current Caltrans Standard Plans. Please refer to the link below for further reference:

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/f0020348_complete-streets-elements-toolbox-a11y.pdf



A2-3



A2-4



A2-5

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- Caltrans recommends the following during the construction stage:
 - Caltrans requests a detailed Construction Management Plan (CMP) including street closure information, a detour plan, haul routes, and a staging plan be prepared and submitted to the City and Caltrans for review and approval, before issuance or demolition, grading, and building permits and commencement of construction.
 - Work with Caltrans Office of Permits, Multi-Modal Unit, for a designated truck route for construction trucks to transport construction equipment to and from the construction sites.
 - Construction vehicles/equipment should use alternative routes to avoid congested state facilities, especially during peak hours.
 - Cover construction trucks with tarpaulin to avoid debris spillage onto State facilities.

A2-6

As a reminder, any transportation of heavy construction equipment and/or materials that requires the use of oversized transport vehicles on State Highways will need a Caltrans transportation permit. Caltrans recommends that the Project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. If construction traffic is expected to cause issues on any State facilities, please submit a construction traffic control plan detailing these issues for Caltrans' review.

A2-7

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04457.

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

*"Provide a safe and reliable transportation network that serves all people
and respects the environment."*

2. Responses to Comments

A3. Response to Comments from Miya Edmonson, California Department of Transportation, submitted via email on March 15, 2024

A2-1 This comment states that Caltrans agrees with the conclusion the Project will not result in VMT impacts and that Caltrans supports the Project on this basis.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

A2-2 This comment states that the Project's proximity to SR-27 (Topanga Canyon Blvd.) may necessitate a Caltrans encroachment permit if landscaping work is conducted adjacent to the right-of-way.

Figure 4 on page 21 of the IS/ND illustrates the extent of work areas for the Project. No landscaping near the SR-27 right-of-way is proposed and resurfacing of the parking lot accessed from SR-27 does not propose work within the right-of-way. Should it be necessary during the course of construction to repair or replace the curb apron leading to this parking lot, the contractor would follow all necessary requirements and obtain all necessary permits prior to work as required by law and the provisions contained in SC-T-3.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

A2-3 This comment states that there is an expectation for the Project to conduct a traffic study per SC-T-3 and notes that upgrades to traffic signals or curb ramps Caltrans is not responsible for fair-share contributions to the improvements.

As mentioned in Section XVIII, *Transportation and Circulation*, and elsewhere in the IS/ND, there is no increase in enrollment capacity associated with the Project and therefore would not increase the number of trips or generate additional VMT. Further, the Project would not modify existing or create new points of vehicular access into the campus. Therefore, there is no expected need for a traffic study as traffic will not be increased above recent conditions by an increase in students or faculty. Consequently there are no plans for traffic signal or curb ramp upgrades as part of the Project.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.



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- A2-4 This comment requests that additional trips associated with construction do not conflict with the SR-27 right-of-way.

As explained on pages 111 and 112 of the IS/ND, the primary staging area for construction is expected to be the basketball courts at the north of the campus which would be accessed from the central promenade with an entrance off of Vanowen Street. Portable classrooms and temporary kitchen facilities will be staged at the parking lot off of SR-27 during construction so with the exception of delivery of the structures there would be no construction traffic at that entrance for the majority of the Project duration. That lot would be resurfaced once portable buildings are removed and per SC-T-4 a construction worksite traffic control plan would include planning for any temporary disturbances to the right-of-way during that work.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

- A2-5 This comment states that Caltrans expects the LAUSD to comply with the Safe Routes to School program and provides several methods to reduce pedestrian and cyclist exposure to vehicle traffic.

Canoga Park High School does not currently have a Safe Routes to School program, nor have any of the streets in the vicinity of the campus been identified by LADOT in the City's High Injury Network. Implementation of a Safe Routes to School program is not within the scope of the Project. The Project does not include any off-site modifications within any local or Caltrans right-of-ways. The Project does implement SC-T-2 which requires that vehicular access and parking comply with the Vehicular Access and Parking guidelines of the School Design Guide. These requirements address internal circulation and parking on the campus only.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

- A2-6 This comment requests the Project submit a construction management plan to the City and Caltrans prior to Project commencement, requests that the District work with Caltrans Office of Permits, Multi-Modal Unit for a designated truck route, that construction traffic should use alternative routes especially during peak hours, and for construction trucks to be covered to avoid debris spillage onto Caltrans facilities.

Per SC-T-4 found on page 110 of the IS/ND a Construction Worksite Traffic Control Plan will be required for the Project prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties

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and applicable transportation related safety measures as required by local and State agencies. SC-T-4 requires LAUSD to encourage contractors to limit construction-related trucks to off-peak commute periods. Per the requirements of SC-T-4 if any activity will conflict with SR—27 the proper coordination and permitting will occur.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

- A3-7 This comment states that any transportation of heavy construction equipment and/or materials that require use of oversized-transport vehicles on State highways will need a Caltrans transportation permit and reiterates requests presented in the previous statement.

Implementation of SC-T-4 requires the District to follow local and state transportation safety measures as necessary. This would include obtainment of a Caltrans transportation permit if required for the Project.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact; therefore, no further response is required. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

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VERBAL COMMENT G1 – Audience Member No. 1

G1. Response to Comments from Audience Member No. 1, submitted verbally on February 29, 2024

G1-1 This commenter asked what would occur if construction costs are larger than anticipated.

The cost of the project is not addressed in the IS/ND as it is not germane to the scope of the environmental document. The design/build bidding process for construction would not add any additional scope of work to the Project and therefore the results of the bidding process would not create any new environmental impacts beyond what is anticipated and analyzed in the IS/MND.

The comment neither identifies a deficiency in the IS/ND's analysis nor a new potential or exacerbated significant environmental impact. Therefore, no additional revisions to the IS/ND are necessary.

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VERBAL COMMENT G2 –Audience Member No.2

G2. Response to Comments from Audience Member No. 2, submitted verbally on February 29, 2024

- G2-1 The commenter asked if the Project will include upgrades to the irrigation system of the athletic field.

As described on page 27 of the IS/ND the new irrigation system will comply with current Model Water Efficient Landscape Ordinance (MWELO) and CalGreen standards which necessitates the use of all new pipes, fixtures, and control systems.

The comment neither identifies a deficiency in the IS/ND’s analysis nor a new potential or exacerbated significant environmental impact. Therefore, no additional revisions to the IS/ND are necessary.

- G2-2 The commenter asked if there will be work performed after official opening of new facilities.

As described on page 27 of the IS/ND work will be performed in stages the details of which will be determined after a winning design/build bid is accepted and prior to the beginning of construction. The scope of work described in the IS/ND reflects the entirety of the project and the project will be considered completed once all work is performed. If segments of completed work are opened for use prior to the completion of other segments that will be done at the discretion of the District.

The comment neither identifies a deficiency in the IS/ND’s analysis nor a new potential or exacerbated significant environmental impact. Therefore, no additional revisions to the IS/ND are necessary.

- G2-3 The commenter asked if there will be any technology updates to WIFI or computer systems.

The Project would include technology infrastructure per LAUSD Design Guidelines in all new buildings. Upgrades to computers or WIFI systems on campus would not be considered a “project” subject to CEQA analysis as it would not involve changes to the environmental baseline of the campus and therefore is not discussed in the IS/ND.

The comment neither identifies a deficiency in the IS/ND’s analysis nor a new potential or exacerbated significant environmental impact. Therefore, no additional revisions to the IS/ND are necessary.



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VERBAL COMMENT G3 – Audience Member No. 3

G3. Response to Comments from Audience Member No. 3, submitted verbally on February 29, 2024

G3-1 The commenter asked how noise from construction will be mitigated.

As described in Section XIII of the IS/ND beginning on page 91, construction noise impacts were analyzed according to the City of Los Angeles impact threshold which establishes a maximum noise level of 75 dB at a distance of 50 feet from the source within 500 feet of a residential zone. LAUSD Standard Condition of Approval SC-N-8 on page 93 of the IS/ND specifies that the construction contractor must implement feasible noise reduction measures including time constraints, mufflers, noise barriers or curtains, and/or equipment enclosures when operating within 500 feet of a sensitive receptor. The noise analysis in the Noise Report attached as Appendix J to the IS/ND determined that construction noise could exceed 75 dB at some residences to the east when/if construction equipment operated close to the Project property line, and that the use of noise reduction measures would reduce levels to an acceptable level. This is demonstrated in Table XIII-3 on page 98 of the IS/ND.

Therefore, implementation of standard conditions would reduce construction noise impacts to less than significant. The IS/ND adequately analyzes noise impacts of the Project, and no revisions are necessary. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.

G3-2 The commenter asked how impacts to traffic resulting from construction will be mitigated.

As described in LAUSD Standard Condition of Approval SC-T-4 found on page 110 of the IS/ND, a Construction Worksite Traffic Control Plan is required prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies, and construction-related truck trips are scheduled during off-peak commute periods as much as practicable. As mentioned on page 112 of the IS/ND, the primary staging area during construction would likely be the basketball courts to the north of the campus and the central promenade would be used for access throughout construction except when it would be refurbished. There is no anticipated need to partially block any travel lanes adjacent to the campus as there is no construction occurring in the public right-of-way and no building construction adjacent to streets.

Therefore, implementation of standard conditions would manage construction traffic and there would no significant impacts associated with it. The IS/ND adequately analyzes issues associated with construction traffic of the Project, and no revisions are necessary. The LAUSD Board of Education will consider all comments prior to making a decision on the proposed Project.