

Final EIR

JOHN BURROUGHS MIDDLE SCHOOL COMPREHENSIVE MODERNIZATION PROJECT

SCH # 2018021052

Prepared for
Los Angeles Unified School District

May 2020



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Los Angeles Unified School District

May 2020

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CHAPTER 7

Final EIR Introduction

This Final Environmental Impact Report (Final EIR) was prepared pursuant to the California Environmental Quality Act (CEQA) of 1970 (as amended) (California Public Resources Code 21000 et seq.) and in accordance with the State Guidelines for the California Environmental Quality Act (CEQA Guidelines). This document, together with the Draft EIR and its technical appendices, comprise the Final EIR. In accordance with Section 15050 of the CEQA Guidelines, the Los Angeles Unified School District (LAUSD or District), as the Lead Agency, has prepared this EIR to provide the public and trustee agencies with information about the potential effects on the local and regional environment associated with implementation of the proposed Project.

The proposed Project addressed in this Final EIR is the John Burroughs Middle School (Burroughs MS) Comprehensive Modernization Project. Burroughs MS is located at 600 South McCadden Place, Los Angeles, California 90005, approximately 5 miles west of downtown Los Angeles. Primary regional access is provided by Interstate 10 (I-10), approximately 2 miles to the south of the Project site and the Campus is located about 10 miles east of the Pacific Ocean. Burroughs MS currently serves grades 6 through 8 with an enrollment of approximately 1,706 students. The Campus houses a Magnet Center and a School for Advanced Studies that currently serves gifted and highly gifted students as part of LAUSD's voluntary integration program.

The proposed Project would include renovations, modernizations, and new construction at Burroughs MS. The proposed Project would include: the demolition of the Cafeteria-Classroom Building (Bldg.20); Flammable Storage Building (Bldg. 13); Girls' Locker Building (Bldg. 17); and, approximately 18 classrooms located in 11 relocatable or portable buildings. The Project would include construction of two new one-story Specialty Classroom Buildings (Building A); and, a three-story Food Services/MPR/Classroom/Lockers Building (Building B). Building A would house approximately three specialty classrooms and support spaces split into two pavilions. Building B would house approximately 16 standard classrooms and eight science classrooms, one student store, boys' and girls' lockers, food services, and indoor dining/MPR. Modernization and/or upgrades and improvements would be completed for the following buildings: Administrative/Library/Auditorium (Bldg. 1); Boy's Gymnasium Building (Bldg. 2); Classroom Building (Bldg. 7); AA-610 (Bldg. 4); Shop Building (Bldg. 9); All Purpose Building (Bldg. 14); AA1143 (Bldg. 18). The Project would increase the number of onsite parking spaces and would add two right-in/right-out only driveways along Wilshire Boulevard to provide access to the expanded southern parking lot. Additionally, the Project would relocate the existing driveway on McCadden Place closer to Wilshire Boulevard, which would allow the existing loading and unloading zone for parent drop-off/pick up along McCadden Place to be extended south by approximately 150 feet. The Project would increase the number of total onsite parking spaces from

98 to 146 in two surface parking lots. Upon completion of Project construction, Burroughs MS would have 71 classrooms including 6 existing classrooms, 38 remodeled classrooms, and 27 new classrooms.

7.1 Background

Pursuant to Section 15082 of the CEQA Guidelines, the lead agency is required to send a Notice of Preparation (NOP) stating that a Draft EIR will be prepared to the state Office of Planning and Research (OPR), responsible and trustee agencies, and federal agencies involved in funding or approving the proposed Project, and county clerk. The NOP must provide sufficient information for responsible agencies to make a meaningful response. At a minimum, the NOP must include a description of the project, location of the project, and probable environmental effects of the project (CEQA Guidelines Section 15082(a)(1)). Within 30 days after receiving the NOP, responsible and trustee agencies and the OPR shall provide the lead agency with specific detail about the scope and content of the environmental information related to that agency's area of statutory responsibility that must be included in the Draft EIR (CEQA Guidelines Section 15082(b)).

On February 16, 2018, in accordance with Sections 15063 and 15082 of the CEQA Guidelines, LAUSD published a NOP for the Draft EIR and circulated it to government agencies, elected officials, organizations, and persons who may be interested in the proposed Project, including nearby landowners, student parents and/or legal guardians, homeowners, and tenants. The NOP requested comments on the scope of the Draft EIR and asked that those agencies with regulatory authority over any aspect of the proposed Project describe that authority. The 30-day comment period went through March 20, 2018. The NOP provided a general description of the proposed Project a description of the Project area, and a preliminary list of potential environmental impacts.

On February 28, 2018, in accordance with CEQA Section 21083.9¹, LAUSD sponsored a public scoping meeting to obtain comments from interested parties on the scope of the Draft EIR. The purpose of the meeting was to present the proposed Project to the public through use of display maps, diagrams, and a presentation describing the proposed Project components and potential environmental impacts. LAUSD staff and members of the local community attended the scoping meeting. Attendees were provided an opportunity to voice comments or concerns regarding potential effects of the proposed Project. The issues addressed by participants are summarized and included in the Draft EIR as part of **Appendix A**. Twenty-six comment letters were received in response to the NOP. Specific environmental concerns that were raised in the comments received on the NOP are discussed in **Table 1-1**, of the Draft EIR.

Based on comments received during the scoping period, changes were made to the scope of the Project to reduce and/or avoid environmental effects. CEQA Guidelines Section 15083 encourages early consultation with interested parties to help identify “the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important.” The revised Project Description is detailed in Section 2.0 of the Draft EIR.

¹ CEQA Section 21083.9 requires that a lead agency call at least one scoping meeting for a project of statewide, regional, or area wide significance.

The Draft EIR for the Burroughs MS Comprehensive Modernization Project was circulated for public review for 45 days between October 30, 2019 and December 16, 2019. While Section 15087 of the State CEQA Guidelines only requires giving notice by at least one of three prescribed methods, the District elected to use all three in an effort to notify as wide an audience as possible. A Notice of Availability (NOA) of the Draft EIR was distributed to all students and staff at Burroughs MS, and direct mailed to all addresses within a ¼-mile radius of the campus, as well as responsible and trustee agencies, regulatory agencies and other interested parties and stakeholders. The NOA was also published in the Los Angeles Daily News and La Opinión and posted at the Project site.

The Draft EIR was made available for public review at the following locations:

- LAUSD Office of Environmental Health and Safety - 333 South Beaudry Avenue, 21st Los Angeles, CA 90017
- LAUSD Local District West - 11380 W. Graham Place, Los Angeles, CA. 90064
- Burroughs Middle School Main Office - 600 S. McCadden Place, Los Angeles, California 90033
- Memorial Branch Public Library - 4625 W. Olympic Blvd, Los Angeles, CA 90019

An electronic copy of the Draft EIR was also posted on the LAUSD OEHS website (<http://achieve.lausd.net/CEQA>).

A public meeting to solicit comments on the Draft EIR was held on November 21, 2019 for public comment. Two comment cards from individuals were provided during the public meeting. The meeting was transcribed and the public comments are included as part of the Final EIR (Chapter 9, Response to Comments). In addition, LAUSD received three comment letters during the public review period from the Los Angeles County Metropolitan Transportation Authority, South Coast Air Quality Management District, and one individual.

7.2 Use of the Final EIR and the CEQA Process

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision makers before approving or denying the proposed project.

Section 15132 of the CEQA Guidelines specifies the Final EIR shall consist of the following:

- a) The Draft EIR or a revision of the draft (provided under a separate cover).
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

Section 15004 of the CEQA Guidelines states that before the approval of any project subject to CEQA,² the Lead Agency must consider the final environmental document, which in this case is the Final EIR. This Final EIR has been prepared pursuant to the requirements of CEQA. This Final EIR incorporates comments from public agencies and the general public, and contains appropriate responses by the lead agency to those comments.

The Final EIR also allows agencies and the public an opportunity to review revisions to the Draft EIR, the response to comments, and other components of the EIR, including revisions and/or corrections to the Draft EIR, prior to approval of the proposed Project. Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency 10 days prior to certification of the Final EIR. The Final EIR is available for public review on the LAUSD Office of Environmental Health & Safety website (<http://achieve.lausd.net/CEQA>).

The Final EIR serves as the environmental document to support approval of the proposed Project, either in whole or in part, if the proposed Project is approved. After completing the Final EIR and before approving the proposed Project, the lead agency must make the following three certifications, as required by Section 15090 of the CEQA Guidelines:

- 1) The Final EIR has been completed in compliance with CEQA;
- 2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the proposed Project; and
- 3) The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091(a) of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record.

The possible findings are:

- 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

² The word "approval" is defined by Section 15352 of the CEQA Guidelines to mean "the decision by a public agency which commits the agency to a definite course of action in regard to a project intended to be carried out by any person..." In addition, the CEQA Guidelines state that "[w]ith private projects, approval occurs upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project."

These certifications and the Findings of Fact will be included in package of documents to be considered by the LAUSD Board of Education. The proposed Project would result in significant and unavoidable noise impacts; therefore, a statement of overriding considerations is required per Section 15093 of the CEQA Guidelines and will also be included in the Board of Education materials.

7.3 Method of Organization

This Final EIR for the proposed project contains information in response to concerns raised by written comments sent to LAUSD. The Final EIR is organized into the following chapters:

- Chapter 7, *Final EIR Introduction*, consists of a summary of the background of the proposed Project, information about the certification of the Final EIR, and a brief discussion of the intended uses of the Final EIR. Chapter 1 also contains the final Summary Table of Impacts and Mitigation Measures.
- Chapter 8, *Errata*, discusses the revisions to the proposed project and Draft EIR, including text changes and/or additions proposed by the LAUSD, as lead agency, and text changes and/or additions in response to comments received on the Draft EIR. Chapter 2 does not contain any changes to the appendices.
- Chapter 9, *Response to Comments*, contains a matrix of agencies and organizations that submitted written comments on the Draft EIR. This matrix identifies the issue areas addressed by those comments. Chapter 9 also includes a copy of each written comment letter, and a written response to each comment.
- Chapter 10, *Mitigation Monitoring and Reporting Program*, includes the Mitigation Monitoring and Reporting Program (MMRP) prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the CEQA Guidelines.

7.4 Environmental Impacts and Mitigation Measures

A detailed discussion of existing environmental conditions, environmental impacts and recommended mitigation measures is included in Chapter 3, *Environmental Setting, Impacts and Mitigation Measures* of the Draft EIR. Project impacts, recommended mitigation measures, and level of significance after mitigation are summarized in **Table ES-1**, which is included in Chapter ES, *Executive Summary* of the Draft EIR.

CHAPTER 8

Errata

This section contains revisions to the Draft EIR. The following corrections and changes are made to the Draft EIR, and are incorporated herein as part of the Final EIR.

The changes below were made to the Draft EIR in response to comments received and errata discovered after the Draft EIR was circulated. These corrections and clarifications represent additional information or revisions that do not significantly alter the proposed Project, change the Draft EIR's significance conclusions, or result in a conclusion that significantly more severe environmental impacts will result from the proposed Project. Instead, the errata made to the Draft EIR below merely "clarifies or amplifies or makes insignificant modifications" in the already adequate Draft EIR, as is permitted by CEQA Guidelines Section 15088.5(b).

The revisions that follow were made to the text of the Draft EIR. Amended text is identified by page number. Additions to the Draft EIR text are shown with underlining and text removed from the Draft EIR is shown with ~~striketrough~~.

The following revisions to the text of the Draft EIR are made:

Section 3.2 Air Quality, of the Draft EIR

The following paragraph has been added on page 3.2-12 of the Draft EIR:

Rule 1166 – Volatile Organic Compound emissions from Decontamination of Soil: This rule requires that an approved mitigation plan be obtained from SCAQMD prior to commencing with excavation of an underground storage tank or piping which has stored VOCs, excavation or grading of soil containing VOC material, handling or storage of VOC-contaminated soil at or from an excavation or grading site, or the treatment of VOC-contaminated soil at a facility. A Site Specific plan is required for excavations involving more than 2,000 cubic yards of VOC-contaminated soil, storage/handling of VOC-contaminated soil at approved treatment facilities, or situations where the standard conditions contained within the Various Locations Plan are not appropriate.

CHAPTER 9

Comment Letters and Response to Comments

The Draft EIR for the Burroughs MS Comprehensive Modernization Project was circulated for public review for 45 days (October 30, 2019 through December 16, 2019). LAUSD received three comment letters during the public review period from the Los Angeles County Metropolitan Transportation Authority, South Coast Air Quality Management District, and one individual. A public meeting was held on November 21, 2019 for public comment. Two comment cards from individuals were provided during the public meeting. The meeting was transcribed and the public comments and responses are included in this Final EIR Chapter under Comment 6 below. The comment letters have been bracketed and assigned comment numbers and are presented in the order listed in the table below. Each comment that requires a response within the letters has been assigned a number. For example, the first comment in Letter No. 1 would be Comment 1-1, and the fourth comment in Letter 2 would be Comment 2-4. The responses to each comment are then correspondingly numbered (i.e., Response 1-1 and Response 2-4). Each comment has been recopied verbatim, or as close as possible to verbatim, from the original letter submitted.

**TABLE 9-1
LIST OF COMMENT LETTERS RECEIVED**

Letter Name	Commenter	Date of Letter
Federal, State and Local Agencies		
1A	Los Angeles County Metropolitan Transportation Authority (Metro)	December 16, 2019
1B	Los Angeles County Metro	April 16, 2020
2	South Coast Air Quality Management District	December 10, 2019
Organizations and Individuals		
3	Andrea Barukh	December 4, 2019
4	Hannah Barukh	November 21, 2019
5	Howard C. Mandel	November 21, 2019
6	Public Meeting Comments – Individuals	November 21, 2019

The comment letters are provided below.



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

December 16, 2019

Mr. Edward Paek
LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, CA 90012
Sent by Email: ceqa-comments@lausd.net

RE: John Burroughs Middle School Comp Mod – Draft Environmental Impact Report

Dear Mr. Paek:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed John Burroughs Middle School Comprehensive Modernization Project (Project) located at 600 South McCadden Place in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

1A-1

The purpose of this letter is to provide the City with recommendations on topics regarding the Project’s potential impacts on the Metro bus facilities and services, which should be included in the Environmental Impact Report (EIR). Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA (CEQA Guidelines section 15064.3(a)).

In addition to the specific comments outlined below, Metro would like to provide the City with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at www.metro.net/projects/devreview/.

Project Description

The Project is adjacent to Metro bus facilities and services and includes demolition of the shop building, girls’ locker building, cafeteria, classroom building, and approximately 18 classrooms located in portable buildings. The Project also includes construction of a new classroom building, food services/multi-purpose room building, classroom/locker room building, and maintenance and operations building. Two new driveways along Wilshire

1A-2

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Boulevard to provide access to the expanded southern parking lot and the existing driveway on South McCadden Place would be relocated approximately 150 feet closer to Wilshire Boulevard.

1A-2
 continued

Comments

Metro Purple Line Extension Adjacency

It is noted that the southern boundary of the Project site is adjacent to Wilshire Boulevard, along which Section One of the Metro Purple Line Extension Transit Project is being constructed. Considering the proximity of the Project to Metro’s subway extension project, the following should be noted:

1A-3

1. Metro encourages the Project sponsor to take special consideration of the Purple Line Extension Transit Project, especially for temporary construction period effects.

1A-4

2. Upon completion, the Metro Purple Line will operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnels sub-adjacent the proposed Project.

1A-5

3. The Metro Purple Line may produce noise and vibration that may be perceptible within the proposed Project. A recorded Noise and Vibration Easement Deed in favor of Metro is required, a form of which is attached. In addition, any noise or vibration mitigation required for the Project will be borne by the Project sponsor and not Metro.

1A-6

4. Neither Metro nor its contractors have continuing, ongoing responsibility to reduce or avoid impacts, other than what is specified in the Final Environmental Impact Report/Environmental Impact Statement for the Westside Subway Extension. For additional information regarding this project please visit: <http://www.metro.net/projects/westside/>. The FEIR can be accessed from the following link: <http://www.metro.net/projects/westside/final-eis-eir/>

1A-7

5. The construction and operation of the proposed Project must not disrupt the operation and maintenance activities of the Metro Purple Line or the structural and systems integrity of Metro’s Purple Line subway tunnels.

1A-8

6. To mitigate against impacts to the Purple Line Extension project, before commencement of construction the Project Sponsor shall obtain clearance of the Project’s construction plans from Metro Engineering, consistent with agency clearances required by the Los Angeles Department of Building and Safety for permit issuance. Dependent on the nature of Project proximity, Metro may need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Please refer to the attached Metro “Design Criteria and Standards, Volume III - Adjacent Construction Design Manual” for more details regarding submitting drawings and calculations to Metro for review. Please note that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed Project to Metro’s planned structures.

1A-9

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- 7. Metro staff shall be permitted to monitor construction activity of the Project to ascertain any impact to the subway tunnel. 1A-10
- 8. The Project Sponsor should be advised that Metro may request reimbursement for costs incurred as a result of Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure. 1A-11
- 9. The Project Sponsor will be required to notify Metro of any changes to the construction/building plans that may or may not impact the subway tunnel. Aspet Davidian, Director, Project Engineering Facilities, should be contacted at 213-922-5258 regarding the project’s potential impacts on Metro’s Purple Line tunnels. 1A-12

Information about the Purple Line Extension Transit Project can also be found on the Metro website at <http://www.metro.net/projects/westside/>. 1A-13

Bus Stop Adjacency

- 1. Service: Metro Bus Lines 720 and 20 operate on Wilshire Boulevard, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Wilshire Boulevard and South McCadden Place. Other transit operators may provide service in this area and should be consulted. 1A-14
- 2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting. 1A-15
- 3. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development. 1A-16
- 4. Driveways: Driveways accessing parking and loading at the Project site should be located away from the transit stop on Wilshire Boulevard and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit. 1A-17
- 5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the Project site. 1A-18
- 6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro’s Stops and Zones Department at 213-922- 1A-19

5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

1A-19
 continued

Transit Orientation

Considering the Project’s proximity to Metro Bus Line 20 and 720, Metro would like to identify the potential synergies associated with transit-oriented development:

1A-20

1. Transit-Supportive Planning Toolkit: To achieve Metro’s program objectives, Metro strongly recommends that the Project Sponsor review the Transit-Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and. applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.
2. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represent a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Project Sponsor to be mindful of the Project’s proximity to the bus stop, including orienting pedestrian pathways towards the bus stop.
3. Transit Access: The Project should address first-last mile connections to transit, encouraging development that is transit-accessible with bicycle and pedestrian-oriented street design that connects transportation with housing and employment centers. The Project Sponsor is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
4. Active Transportation: Metro strongly encourages the Project Sponsor to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. These features can include the following:
 - a. Walkability: The installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops.
 - b. Bicycle Use: The provision of adequate short-term bicycle parking, such as ground level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees and guests. Bicycle parking facilities should be designed with best practices in mind, including highly

1A-21

1A-22

1A-23

1A-24

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visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed.

1A-24
cont.

5. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

1A-25

6. Transit Pass: Metro would like to inform the Project Sponsor of Metro’s employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Student Transit Access Pass programs. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Vanessa Adlawan at AdlawanV@metro.net.

1A-26

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at LingS@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

1A-27

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

Smith, Eimon

From: Ling, Shine <LingS@metro.net>
Sent: Thursday, April 16, 2020 6:21 PM
To: Smith, Eimon
Cc: Wong, Christy; GODEK, GWENN; DevReview
Subject: Burroughs Middle School Comp Mod - DEIR follow-up comments (Metro)

CAUTION: EXTERNAL EMAIL

Dear Eimon:

The Los Angeles County Metropolitan Transportation Authority (Metro) has reviewed the DEIR for the John Burroughs Middle School Comprehensive Modernization Project (Project) located at 600 South McCadden Place, Los Angeles, and provides the following comments below to supplement Metro’s DEIR comment letter dated December 16, 2019:

- 1. Metro will no longer require a Noise and Vibration Easement Deed for the Project. Given that the nearest Project building is approximately 300 feet from Wilshire Boulevard, any noise/vibration impacts on the Project from Metro Purple Line operations would be minimal.
- 2. Metro respectfully requests LAUSD to provide Metro with construction drawings and a traffic control plan for the Project at least 1 month before start of construction. This will allow Metro staff to screen for any potential impacts to Metro Purple Line construction activities and operations. This request is consistent with Metro’s review of projects located within a 100-ft buffer of Metro right-of way that require permits from the City of Los Angeles Department of Building and Safety.

Please contact me if you have any questions.

Best,

Shine

Shine Ling, AICP
LA Metro
Manager, Transportation Planning
Transit Oriented Communities
213.922.2671
lings@metro.net

1B-1

1B-2

1B-3

metro.net | facebook.com/losangelesmetro | [@metrolosangeles](https://twitter.com/metrolosangeles)
Metro's mission is to provide world-class transportation for all.

Comment No. 1A-1

The Los Angeles County Metropolitan Transportation Authority (Metro) appreciates coordination regarding the proposed John Burroughs Middle School Comprehensive Modernization Project. The purpose of the letter is to “provide the City [sic] with recommendations on topics regarding the Project’s potential impacts on the Metro bus facilities and services, which should be included in the Environmental Impact Report (EIR). Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA (CEQA Guidelines section 15064.3(a)).”

In addition to the specific comments outlined below, Metro provided the District with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities.

Response to Comment No. 1A-1

This comment is introductory and provides general information regarding Metro. Responses to the comments contained in this letter are provided below in Responses to Comment Nos. 1-2 through 1-27.

Comment No. 1A-2

The Project is adjacent to Metro bus facilities and services and includes demolition of the shop building, girls’ locker building, cafeteria, classroom building, and approximately 18 classrooms located in portable buildings. The Project also includes construction of a new classroom building, food services/multi-purpose room building, classroom/locker room building, and maintenance and operations building. Two new driveways along Wilshire Boulevard to provide access to the expanded southern parking lot and the existing driveway on South McCadden Place would be relocated approximately 150 feet closer to Wilshire Boulevard.

Response to Comment No. 1A-2

The commenter summarizes the project description and construction details. It should be noted that the Project will no longer include construction of a new maintenance and operations building and that the shop building will no longer be demolished and replaced, but instead retained and renovated, as described in Chapter 2 of the Draft EIR. No further response is required. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 1A-3

It is noted that the southern boundary of the Project site is adjacent to Wilshire Boulevard, along which Section One of the Metro Purple Line Extension Transit Project is being constructed. Considering the proximity of the Project to Metro’s subway extension project, Metro outlines a number of comments in relation to the Metro Purple Line Extension to be noted.

Response to Comment No. 1A-3

The commenter outlines a number of comments (Comments 1-4 through 1-12) in relation to the Metro Purple Line Extension to be noted. Responses to each of those comments have been included below (Response 1-4 through 1-12)

Comment No. 1A-4

Metro encourages the Project sponsor to take special consideration of the Purple Line Extension Transit Project, especially for temporary construction period effects.

Response to Comment No. 1A-4

As discussed on page 3.7-6 of the Draft EIR, LAUSD Standard Condition (SC) T-4 requires that contractors submit a construction worksite traffic control plan that would be submitted to LADOT for review prior to construction. The traffic control plan would include, but would not be limited to, restricting construction-related trucks to off-peak commute periods, and provision of flaggers to assist or direct traffic flows to and from the local streets. Concurrent construction of the Purple Line Extension Transit Project would be considered when the construction worksite traffic control plan is prepared.

Comment No. 1A-5

Upon completion, the Metro Purple Line will operate peak service as often as every four minutes in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the tunnels sub-adjacent the proposed Project.

Response to Comment No. 1A-5

The commenter states the operational hours and activities of the Metro Purple Line upon completion. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 1A-6

The Metro Purple Line may produce noise and vibration that may be perceptible within the proposed Project. A recorded Noise and Vibration Easement Deed in favor of Metro is required, a form of which is attached. In addition, any noise or vibration mitigation required for the Project will be borne by the Project sponsor and not Metro.

Comment No. 1B-1

The Los Angeles County Metropolitan Transportation Authority (Metro) has reviewed the DEIR for the John Burroughs Middle School Comprehensive Modernization Project (Project) located at 600 South McCadden Place, Los Angeles, and provides the following comments below to supplement Metro's DEIR comment letter dated December 16, 2019:

1. Metro will no longer require a Noise and Vibration Easement Deed for the Project. Given that the nearest Project building is approximately 300 feet from Wilshire Boulevard, any noise/vibration impacts on the Project from Metro Purple Line operations would be minimal.

Response to Comment No. 1A-6

The commenter stated that a Noise and Vibration Easement Deed in favor of Metro is required. However, per Metro's subsequent correspondence dated April 16, 2020, Metro no longer requests a Noise and Vibration Easement Deed from the District. See Comment No. 1B-1, above.

Response to Comment No. 1B-1

See Response to Comment No. 1A-6, above.

Comment No. 1A-7

Neither Metro nor its contractors have continuing, ongoing responsibility to reduce or avoid impacts, other than what is specified in the Final Environmental Impact Report/Environmental Impact Statement for the Westside Subway Extension. Website links for the Westside Subway Extension and the FEIR are provided.

Response to Comment No. 1A-7

The commenter refers to the Final Environmental Impact Report/Environmental Impact Statement for the Westside Subway Extension for measures being taken to reduce or avoid impacts. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 1A-8

The construction and operation of the proposed Project must not disrupt the operation and maintenance activities of the Metro Purple Line or the structural and systems integrity of Metro's Purple Line subway tunnels.

Response to Comment No. 1A-8

Given the distance of the Project from the Metro Purple Line Extension project, the construction and operation of the Project would not disrupt the operation and maintenance activities of the Metro Purple Line or the structural and systems integrity of Metro's Purple Line subway tunnels. As discussed on page 3.5-2 and 3.5-19 of the Draft EIR, the depth of excavations to remove impacted soils would be limited due to the physical constraints of the site. Further, the Project site consists of improvements to an existing middle school and excavation would be limited to the existing Campus boundaries. Therefore, excavation would not reach depths that would disrupt the structural and systems integrity of Metro's Purple Line subway tunnels (which are more than 50 feet deep). Long term operations would not result in any excavation or other activities that would disrupt the structural and systems integrity of Metro's Purple Line subway tunnels.

Comment No. 1A-9

To mitigate against impacts to the Purple Line Extension project, before commencement of construction, the Project Sponsor shall obtain clearance of the Project's construction plans from Metro Engineering, consistent with agency clearances required by the Los Angeles Department of Building and Safety for permit issuance. Dependent on the nature of Project proximity, Metro may need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Metro refers to their "Design Criteria and Standards, Volume III - Adjacent Construction Design Manual" for more details regarding submitting drawings and calculations to Metro for review and notes that Metro requires an Engineering Review Fee for evaluation of any impacts based on adjacency and relationship of the proposed Project to Metro's planned structures.

Comment No. 1B-2

Metro respectfully requests LAUSD to provide Metro with construction drawings and a traffic control plan for the Project at least 1 month before start of construction. This will allow Metro staff to screen for any potential impacts to Metro Purple Line construction activities and operations. This request is consistent with Metro's review of projects located within a 100-ft buffer of Metro right-of way that require permits from the City of Los Angeles Department of Building and Safety.

Comment No. 1B-3

Please contact me if you have any questions.

Best,
Shine
Shine Ling, AICP
LA Metro
Manager, Transportation Planning
Transit Oriented Communities

Response to Comment No. 1A-9

Per Metro's request, LAUSD will coordinate with Metro and provide copies of the construction drawings and traffic control plans to Metro for review at least one month prior to commencement of construction. This will enable Metro to provide a cursory review and screen the Project for any potential conflicts with the Purple Line Extension project.

Response to Comment No. 1B-2

See Response to Comment No. 1A-9.

Response to Comment No. 1B-3

This comment is a conclusion to the letter and provides contact information at Metro if further questions arise. The comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 1A-10

Metro staff shall be permitted to monitor construction activity of the Project to ascertain any impact to the subway tunnel.

Response to Comment No. 1A-10

The commenter requests that Metro staff be permitted to monitor construction of the Project to ascertain any impact to the subway tunnel. LAUSD will coordinate with Metro on construction monitoring. However, all costs incurred by the monitor shall be the responsibility of Metro, and not LAUSD.

Comment No. 1A-11

The Project Sponsor should be advised that Metro may request reimbursement for costs incurred as a result of Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.

Response to Comment No. 1A-11

LAUSD will coordinate with Metro on construction scheduling and activities to ensure that the Project would not cause any delay or harm to the Metro service delivery or infrastructure. The Project would be required to prepare a traffic control plan as part of SC-T-4 listed on page 3.7-5 of the Draft EIR. Elements of the traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods (i.e., between 9:00 a.m. and 4:00 p.m. and after 6:00 p.m.), and provision of flaggers to assist or direct traffic flows to and from the local streets. The implementation and monitoring of these elements would minimize construction-related disruptions to adjacent transportation services and infrastructure, especially during times when traffic congestion is heaviest, which also corresponds to Metro's peak service periods.

Operation of the Project would not generate any additional vehicle trips, as it would not increase the existing number of students or staff. The introduction of two new driveways on Wilshire Boulevard would not require the removal or relocation of the bus stops and would therefore not affect the effectiveness of transit service. As stated on page 3.7-8 of the Draft EIR, the two new driveways may conflict with buses operating in the exclusive bus-only lane along the Wilshire Boulevard frontage of the Project site. However, the driveways would be designed using standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards. LAUSD consulted with LADOT during development of the Project site plan regarding the proposed driveways on Wilshire Boulevard, and LADOT provided preliminary approval of the location of the proposed driveways, provided that they remain right-in/right-out only. Finally, the two new driveways would not represent an unusual condition for Metro bus operators on Wilshire Boulevard, as there are already numerous existing driveways serving commercial and residential land uses nearby.

Should any delay or harm to Metro service delivery or infrastructure as a result of any cause not related to the construction or operation of the Project, LAUSD will not be required to provide reimbursement for costs incurred by Metro.

Comment No. 1A-12

The Project Sponsor will be required to notify Metro of any changes to the construction/building plans that may or may not impact the subway tunnel. Metro provides the contact information for the Director of Project Engineering Facilities and encourages contact regarding the project's potential impacts on Metro's Purple Line tunnels.

Response to Comment No. 1A-12

LAUSD will coordinate with Metro on construction plans and scheduling to ensure that there would be no impact to the subway tunnel.

Comment No. 1A-13

Information about the Purple Line Extension Transit Project can also be found on the Metro website at <http://www.metro.net/projects/westside/>.

Response to Comment No. 1A-13

The commenter provides a website link where information about the Purple Line Extension can be found. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 1A-14

Bus Stop Adjacency

1. Service: Metro Bus Lines 720 and 20 operate on Wilshire Boulevard, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Wilshire Boulevard and South McCadden Place. Other transit operators may provide service in this area and should be consulted.

Response to Comment No. 1A-14

Pages 3.7-7 and 3.7-10 of the Draft EIR discusses the bus stops located on Wilshire Boulevard and South McCadden Place. As stated, neither construction nor operation of the Project would require the removal or relocation of the bus stops. Furthermore, the Project would be required to submit a construction worksite traffic control plan that would outline the Contractor's plans for avoiding traffic related disruptions. The limits of construction and District-implemented construction restrictions would avoid or limit construction and the potential for disruptions and would therefore not affect the effectiveness of transit service during operations.

Comment No. 1A-15

2. Impact Analysis: The EIR should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.

Response to Comment No. 1A-15

Pages 3.7-7 and 3.7-10 of the Draft EIR discusses the bus stops located on Wilshire Boulevard and South McCadden Place. The Project would be required to prepare a traffic control plan as part of SC-T-4 listed on page 3.7-5 of the Draft EIR. Elements of the traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods, and locating access to abutting properties, and providing applicable transportation related safety measures as required by local and State agencies. As stated, the Project would be required to submit a construction worksite traffic control plan to the LADOT for review prior to construction and operations would not result in the removal or relocation of the bus stops and would therefore not affect the effectiveness of transit service during operations. Therefore, Project construction and operation would not result in temporary or permanent bus service rerouting.

Comment No. 1A-16

3. Final Bus Stop Condition: The existing Metro bus stop must be maintained as part of the final Project. During construction, the stop must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.

Response to Comment No. 1A-16

Pages 3.7-7 and 3.7-10 of the Draft EIR discusses the bus stops located on Wilshire Boulevard and South McCadden Place. As stated, the Project would be required to submit a construction worksite traffic control plan to the LADOT for review prior to construction and operations would not result in the removal or relocation of the bus stops and would therefore not affect the effectiveness of transit service during operations. Maintenance of the bus stop is the responsibility of Metro, and not LAUSD. The Project would not require the relocation or rebuilding of any bus stops and therefore would not be required to submit any plans and would not be responsible for making any bus stops ADA-compliant. ADA compliance is the responsibility of the service provider, Metro.

Comment No. 1A-17

4. Driveways: Driveways accessing parking and loading at the Project site should be located away from the transit stop on Wilshire Boulevard and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit.

Response to Comment No. 1A-17

Pages 3.7-7 and 3.7-10 of the Draft EIR discusses the bus stops located on Wilshire Boulevard and South McCadden Place. The Project would be required to prepare a traffic control plan for review prior to construction and operations as part of SC-T-4 listed on page 3.7-5 of the Draft EIR. Elements of the traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods, and locating access to abutting properties, and providing applicable transportation related safety measures as required by local and State agencies. Page 3.7-8 of the Draft EIR discusses the proposed two new driveways would be limited to right-in/right-out access which would limit potential conflicts leading to collisions.¹ All driveway design included adequate turning radii and line-of-sight would comply with LADOT Standards. LAUSD would coordinate with LADOT and Metro to ensure new driveway designs are designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible.

Comment No. 1A-18

5. Bus Stop Access & Enhancements: Metro encourages the installation of bus shelters with benches, wayfinding signage, enhanced crosswalks and ramps compliant with the Americans with Disabilities Act (ADA), as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the Project site.

Response to Comment No. 1A-18

Pages 3.7-7 and 3.7-10 of the Draft EIR discusses the bus stops located on Wilshire Boulevard and South McCadden Place. The Project would not require the relocation or rebuilding of any bus stops and therefore would not be required to make any improvements to or install any amenities to existing bus stops.

Comment No. 1A-19

6. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal bus services may also be impacted and should be included in construction outreach efforts.

Response to Comment No. 1A-19

The commenter provides the contact information of the Metro Bus Operations Control Special Events Coordinator and Metro's Stops and Zones Department. This comment is noted and will be provided to the decision makers for review and consideration.

¹ U.S. Department of Transportation Federal Highway Administration. Access Management in the Vicinity of Intersections. https://safety.fhwa.dot.gov/intersection/other_topics/fhwasa10002/#s11. Accessed July 2018

Comment No. 1A-20

Transit Orientation

Considering the Project's proximity to Metro Bus Line 20 and 720, Metro identified the potential synergies associated with transit-oriented development.

Response to Comment No. 1A-20

The commenter identifies potential synergies associated with transit-oriented development (Comments 1A-21 through 1A-26) in relation to the Metro Purple Line Extension to be noted. Responses to each of those comments have been included below (Response 1A-21 through 1A-26)

Comment No. 1A-21

1. Transit-Supportive Planning Toolkit: To achieve Metro's program objectives, Metro strongly recommends that the Project Sponsor review the Transit-Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and. Applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/projects/tod-toolkit>.

Response to Comment No. 1A-21

LAUSD acknowledges the comment, which recommends a review of Metro's Transit-Supportive Planning Toolkit. The comment does not address the contents of the Draft EIR or raise a significant environmental issue. As such, no further response is necessary.

Comment No. 1A-22

2. Land Use: Metro supports development of commercial and residential properties near transit stops and understands that increasing development near stops represent a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Project Sponsor to be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the bus stop.

Response to Comment No. 1A-22

The Project is designed to improve site circulation, access (including ADA-compliant path of travel upgrades), and parking at the Campus. Pedestrian access to Burroughs MS is currently provided via McCadden Place and West 6th Street, both of which will be maintained with implementation of the Project. As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with

vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.²

Comment No. 1A-23

3. Transit Access: The Project should address first-last mile connections to transit, encouraging development that is transit-accessible with bicycle and pedestrian-oriented street design that connects transportation with housing and employment centers. The Project Sponsor is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. For reference, please review the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf

Response to Comment No. 1A-23

The Project is designed to improve site circulation, access (including ADA-compliant path of travel upgrades), and parking at the Campus. Students, faculty, and staff can currently travel to school using public transit routes, bicycles, and by walking. There are sidewalks on all streets surrounding the school. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as walking and riding bicycles to school. The westbound LA Metro Line 20 has bus stop shelters on either side of Burroughs MS at the northeast corner of Wilshire Boulevard / McCadden Place (westbound) and the northwest corner of Wilshire Boulevard / Keniston Avenue. Section 2.2 of the School Design Guide addresses site design, which includes guidance for the location, content, and design of onsite signage – including pedestrian directional signage to accommodate way-finding. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.³

Comment No. 1A-24

4. Active Transportation: Metro strongly encourages the Project Sponsor to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations.

These features can include the following:

Walkability: The installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops.

Bicycle Use: The provision of adequate short-term bicycle parking, such as ground level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting,

² LAUSD, 2019. Facilities Services Division, School Design Guide Documents, <https://www.laschools.org/new-site/asset-management/school-design-guide>. Accessed May 8, 2020.

³ Ibid.

effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed.

Response to Comment No. 1A-24

The Project is designed to improve site circulation, access (including ADA-compliant path of travel upgrades), and parking at the Campus. Students, faculty, and staff can currently travel to school using public transit routes, bicycles, and by walking. There are sidewalks on all streets surrounding the school. In addition, LAUSD encourages ride-sharing programs for students and teachers, as well as walking and riding bicycles to school. The westbound LA Metro Line 20 has bus stop shelters on either side of John Burroughs Middle School at the northeast corner of Wilshire Boulevard / McCadden Place (westbound) and the northwest corner of Wilshire Boulevard / Keniston Avenue. There are 37 City of Los Angeles street trees that border the Project site along the sidewalks on Wilshire Boulevard, South McCadden Place, and West 6th Street. A row of Sycamore trees would be provided along McCadden Place starting at the new Food Services Building (Building B) down to southern parking lot. Torrey Pine trees would be provided along the northeastern boundary of the Campus (6th Street).

As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. In addition, Section 2.2 of the School Design Guide addresses site design, which includes guidance for the location and size of bicycle and skateboard storage areas, as well as landscaping. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects. Additional information can be found here: <https://www.laschools.org/new-site/asset-management/school-design-guide>.

Comment No. 1A-25

5. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand.

Response to Comment No. 1A-25

LAUSD encourages ride-sharing programs for students and teachers, as well as walking and riding bicycles to school. As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with parking space requirements. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.⁴

⁴ Ibid.

Comment No. 1A-26

6. Transit Pass: Metro would like to inform the Project Sponsor of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Student Transit Access Pass programs. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. For more information on these programs, contact Vanessa Adlawan at AdlawanV@metro.net.

Response to Comment No. 1A-26

LAUSD acknowledges the comment, which recommends employing Metro's incentive programs to encourage public transit usage by employees and students. The comment does not address the contents of the Draft EIR or raise a significant environmental issue. As such, no further response is necessary.

Comment No. 1A-27

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at LingS@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

Response to Comment No. 1A-27

This comment is a conclusion to the letter and provides contact information at Metro if further questions arise. The comment is noted and will be provided to the decision makers for review and consideration.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
 (909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

December 10, 2019

CEQA-comments@lausd.net

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

**Draft Environmental Impact Report (Draft EIR) for the Proposed
 Burroughs Middle School Comprehensive Modernization Project (SCH No.: 2018021052)**

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 EIR.

South Coast AQMD Staff’s Summary of Project Description

The Lead Agency proposes to modernize the existing Burroughs Middle School, which includes the demolition of 51,469 square feet, renovation of 116,815 square feet, and construction of 76,036 square feet of academic buildings on 10.4 acres (Proposed Project). The Proposed Project is located at 600 South McCadden Place on the southeast corner of South McCadden Place and West 6th Street in the community of Wilshire within the City of Los Angeles. Construction of the Proposed Project is anticipated to occur over a five-year period from 2020 through 2025¹.

2-1

Due to historical agricultural activities and pesticide usage on the Proposed Project site, the Lead Agency conducted a Phase I Environmental Site Assessment (ESA) and found that the soil was impacted with arsenic and lead at or above regulatory screening levels². The Lead Agency finalized a Removal Action Plan in 2018, which describes, among others, the type and level of contamination and the methods for the removal and disposal of 160 cubic yards (cy) of impacted soil³.

The Lead Agency also found that the Proposed Project site is within the City of Los Angeles Methane Zone and conducted a methane assessment. The Lead Agency found that concentrations of methane were above background levels and that the Proposed Project is required to implement methane mitigation measures required by the City of Los Angeles Department of Building & Safety (LADBS)⁴.

South Coast AQMD Staff’s Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project’s construction emissions, including those from removal activities, 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 air quality impacts from the Proposed Project’s construction and removal activities would be less than significant⁵. The Lead Agency also found that the Proposed Project would have no net new operational emissions, and the air quality impacts from operation would be less

2-2

¹ Draft EIR. Chapter 2. Project Description. “2.6.10 Construction Schedule” Page 2-25.
² *Ibid.* “2.6.9 Removal Action Workplan” Page 2-25.
³ Draft EIR. Chapter 3.5 Hazards and Hazardous Materials. Page 3.5-7
⁴ Draft EIR. Chapter 2. Project Description “2.6.8 Methane Mitigation”. Pages 2-24 through Page 2-25.
⁵ Draft EIR. Chapter 3.2 Air Quality. Pages 3.2-21 through 3.2-30.

than significant. As such, no mitigation measures for air quality impacts were included⁶. The Lead Agency also included in the Draft EIR discussions on applicable South Coast AQMD rules⁷, including Rule 401 – Visible Emissions⁸, Rule 402 – Nuisance⁹, Rule 403 – Fugitive Dust¹⁰, Rule 1113 – Architectural Coatings¹¹, Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters¹², Rule 1403 – Asbestos Emissions form Demolition¹³, and Rule 1466 – Control of Particulate Emissions form Soils with Toxic Air Contaminants¹⁴.

2-2
cont.

South Coast AQMD Rules and Permits

Disturbing and excavating soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil¹⁵. The Lead Agency should include a discussion on South Coast AQMD Rule 1166 in the Air Quality Section of the Final EIR.

2-3

Since the Proposed Project will disturb soils which contain concentrations of methane¹⁶, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD’s Engineering and Permitting staff in advance to determine whether or not any permits, plans, or compliance actions will need to be filed and approved by South Coast AQMD prior to commencing soil disturbing activities. Operation of portable engines and portable equipment units of 50 brake horsepower or greater (> 50bhp) that emit particulate matter requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)¹⁷. If a permit from South Coast AQMD is required, South Coast AQMD is a Responsible Agency for the Proposed Project and should be identified in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB’s webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

2-4

2-5

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with

2-6

⁶ *Ibid.*

⁷ *Ibid.* Pages 3.2-11 through 3.2-12.

⁸ South Coast AQMD Rule 401 – Visible Emissions. Accessed at: <http://www.aqmd.gov/docs/default-source/compliance/visible-emissions.pdf>

⁹ South Coast AQMD Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁰ South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹¹ South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

¹² South Coast AQMD. Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf>

¹³ South Coast AQMD. Rule 1403 – Asbestos Emissions form Demolition. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>

¹⁴ South Coast AQMD. Rule 1466 – Control of Particulate Emissions form Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹⁵ South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

¹⁶ Draft EIR. Chapter 3.5 Hazards and Hazardous Materials. Pages 3.5-6 through 3.5-7

¹⁷ South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

Edward Paek

December 10, 2019

written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

2-6 cont.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

2-7

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM
LAC191101-11
Control Number

Comment No. 2-1

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

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to modernize the existing Burroughs Middle School, which includes the demolition of 51,469 square feet, renovation of 116,815 square feet, and construction of 76,036 square feet of academic buildings on 10.4 acres (Proposed Project). The Proposed Project is located at 600 South McCadden Place on the southeast corner of South McCadden Place and West 6th Street in the community of Wilshire within the City of Los Angeles. Construction of the Proposed Project is anticipated to occur over a five-year period from 2020 through 2025.

Due to historical agricultural activities and pesticide usage on the Proposed Project site, the Lead Agency conducted a Phase I Environmental Site Assessment (ESA) and found that the soil was impacted with arsenic and lead at or above regulatory screening levels. The Lead Agency finalized a Removal Action Plan in 2018, which describes, among others, the type and level of contamination and the methods for the removal and disposal of 160 cubic yards (cy) of impacted soil.

The Lead Agency also found that the Proposed Project site is within the City of Los Angeles Methane Zone and conducted a methane assessment. The Lead Agency found that concentrations of methane were above background levels and that the Proposed Project is required to implement methane mitigation measures required by the City of Los Angeles Department of Building & Safety (LADBS).

Response to Comment No. 2-1

The commenter summarizes the project description, construction period, findings of the Phase 1 Environmental Site Assessment, Removal Action Plan and methane mitigation measures. No further response is required. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 2-2

South Coast AQMD Staff's Summary of the Air Quality Analysis in the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction emissions, including those from removal activities, 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 air quality impacts from the Proposed Project's construction and removal activities would be less than significant. The Lead Agency also found that the Proposed Project would have no net new operational emissions, and the air quality impacts from operation would be less than significant. As such, no mitigation measures for air quality impacts were included. The Lead Agency also included in the Draft EIR discussions on applicable South Coast AQMD rules, including Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 403 – Fugitive Dust, Rule 1113 – Architectural Coatings, Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters,

Rule 1403 – Asbestos Emissions from Demolition, and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants.

Response to Comment No. 2-2

The commenter acknowledges that Project construction and operations would result in less than significant impacts and lists the SCAQMD Rules summarized in Section 3.2 (Air Quality) of the Draft EIR.

Comment No. 2-3

South Coast AQMD Rules and Permits

Disturbing and excavating soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. The Lead Agency should include a discussion on South Coast AQMD Rule 1166 in the Air Quality Section of the Final EIR.

Response to Comment No. 2-3

The commenter notes that SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil should be discussed in Section 3.2 of the Draft EIR. Although discussion of Rule 1166 was not included in the Draft EIR, the Project would be required to comply with the provisions of the Rule as a matter of law. Section 3.2 has been revised to include discussion of Rule 1166 and is included in the Errata of this Final EIR.

The following paragraph has been added on page 3.2-12 of the Draft EIR:

Rule 1166 – Volatile Organic Compound emissions from Decontamination of Soil: This rule requires that an approved mitigation plan be obtained from SCAQMD prior to commencing with excavation of an underground storage tank or piping which has stored VOCs, excavation or grading of soil containing VOC material, handling or storage of VOC-contaminated soil at or from an excavation or grading site, or the treatment of VOC-contaminated soil at a facility. A Site Specific plan is required for excavations involving more than 2,000 cubic yards of VOC-contaminated soil, storage/handling of VOC-contaminated soil at approved treatment facilities, or situations where the standard conditions contained within the Various Locations Plan are not appropriate.

Comment No. 2-4

Since the Proposed Project will disturb soils which contain concentrations of methane¹⁶, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff in advance to determine whether or not any permits, plans, or compliance actions will need to be filed and approved by South Coast AQMD prior to commencing soil disturbing activities. Operation of portable engines and portable equipment units of 50 brake horsepower or greater (> 50bhp) that emit particulate matter requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)¹⁷. If a permit from South Coast AQMD is required, South Coast AQMD is a Responsible

Agency for the Proposed Project and should be identified in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project.

Response to Comment No. 2-4

LAUSD will consult with SCAQMD's Engineering and Permitting staff to determine whether or not any permits, plans, or compliance actions will need to be filed and approved by SCAQMD prior to commencing soil disturbing activities. LAUSD acknowledges that a permit or registration under the Portable Equipment Registration Program (PERP) would be required for portable equipment units of 50 brake horsepower or greater and that SCAQMD would be the Responsible Agency for the Project.

Comment No. 2-5

Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/ourwork/programs/portable-equipment-registration-program-perp>.

Response to Comment No. 2-5

The commenter provides a link to CARB's webpage and a CARB contact number where further information can be obtained. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 2-6

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

Response to Comment No. 2-6

The commenter requests that written, good faith, responses to all comments be provided to SCAQMD staff prior to the certification of the Final EIR. Responses to SCAQMD comments have been included herein, to be submitted prior to certification of the Final EIR.

Comment No. 2-7

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Response to Comment No. 2-7

This comment is a conclusion to the letter and provides contact information at SCAQMD if further questions arise. The comment is noted and will be provided to the decision makers for review and consideration.

Paek, Edward

From: Paek, Edward
Sent: Wednesday, December 11, 2019 3:56 PM
To: Paek, Edward
Subject: FW: John Burroughs Modernization Project /Comments (Andrea Barukh/ 659 S. Mc Cadden Pl)

-----Original Message-----

From: Andrea Barukh <andreabarukh@yahoo.com>
 Sent: Wednesday, December 4, 2019 1:44 AM
 To: California Environmental Quality Act Comments <CEQA-Comments@lausd.net>; California Environmental Quality Act Comments <CEQA-Comments@lausd.net>
 Subject: John Burroughs Modernization Project /Comments (Andrea Barukh/ 659 S. Mc Cadden Pl)

12/4/2019

I live across the street from the proposed John Burroughs Modernization Project. I have attended and spoke at every meeting. Every concern that I have made has either been ignored or dismissed. My neighbors have spoken on some of the same issues that I have and have not had any resolution to their concerns either.

One concern that I have consistently advocated for is changing the location of the carline. I have lived in front of the school for 17 years and therefore feel that I am qualified to speak on the safety of the students and neighbors when school lets out every day. I have not only submitted safety concerns regarding the carline by email to the Draft EIR but also pictures of vehicles going down Mc Cadden THE WRONG WAY because of the car line!!!! My pictures were not included in the Draft EIR Report and my safety concerns for the students and neighbors were surprisingly IGNORED in the report.

The response given in the Draft EIR Report was that the carline will remain on the 600 block of S. Mc Cadden. Everything that I wrote regarding safety was not addressed.

In my comments to the Draft EIR, I wrote that there are roughly 2000 students funneling out onto the small street of S. Mc Cadden when school ends. The cars that are waiting are bumper to bumper. I see students walking, cars honking, vehicles going down the street the WRONG WAY, cars blocking driveways, and accidents occurring.

I find it EXTREMELY hypocritical of LAUSD and the designers of this project to say that one of the main objectives of this project is to make it SAFER for the students and yet they ignore the most obvious safety issue. The only explanation that a representative gave as to why they wouldn't consider moving the carline is because of money issues. I find this explanation hard to comprehend since this is over a \$110,000,000 project.

My wish is to have JB incorporate the carline to be in the parking lot of JB and taken off the small neighborhood street of S. Mc Cadden. By doing this, there will be more control, less accidents, and easier safer access to homes for the neighbors.

The new design that is being proposed will make it so that the buses will enter and exit John Burrough's off Wilshire Blvd. I propose that the carline do the same. If for some reason this isn't possible, I would like the designers of this project to offer other options to take the traffic off of Mc Cadden.

I know the carline can be on school property because I have seen other schools that have their drop off and pick up on school property.

3-1

On another note, I want to document that a lot of my concerns that I submitted to the Draft EIR were not addressed such as my concern that this project might hurt my house foundation, the rat infestation at JB coming to the neighborhood during construction, safety issues regarding the carline, etc.

3-2

I thought that every concern that people submitted would be addressed and responded to so that there would be clarity and debate. Why weren't all my concerns printed for people to see in the Draft EIR? I feel like the rules weren't followed when preparing the EIR.

Another thing that I would like to bring up is that every time I go to the meetings, the project speakers would try to make everyone excited and less apprehensive about this project by saying how beautiful the design is, the transformation of the court yard, the upgrades, the retrofitting, the landscape, the increase in the amount of cars that the parking lot will hold, etc. etc. etc.

The representatives, however, NEVER talked about the neighbors living on S Mc Cadden and how this will negatively impact them for five years (7am-7pm M-F and 8-5 Sat). The representatives didn't seem to care that the neighbors would loose their rights to peaceful enjoyment of their property. Not only did the representatives not bring these issues up, they usually, in the nicest way gave reasons why they couldn't help us with our concerns.

3-3

Examples of concerns that were brought up by the neighbors and concerned parents include work trucks being parked on Mc Cadden and there not being enough parking for neighbors. The response at one of the meetings was that they will try to avoid parking on Mc Cadden but the reality is that if they need too they will.

3-4

Another big concern was the noise that would occur for FIVE YEARS. Their response was they will try to do things to cut down on the noise but the reality is that at times the noise will be significant and that's just the way it is.

3-5

Dangers of pollutants and toxins was a concern. There was a lot of talk from the representatives about different agencies being involved but I never heard that there would be a 100 percent guarantee that the air that we breathe from the exhaust, diesel fuel, and toxins while this construction is going on will be safe.

3-6

If we can't get a 100 percent guarantee that we will be safe, why do the students and the neighbors living of Mc Cadden have to potentially risk their health for this project? This is not fair and makes me personally very upset!!!

Because of the noise that in the report says that at times will be significant, traffic, and most of all safety concerns, I want to know if there will be any ACCOMMODATIONS for the neighbors living of the 600 block of S. Mc Cadden.

3-7

Some accommodations that I would like to see are parking permits for the neighbors to park on JB's parking lot when there is no parking on the street due to all the work trucks. This is a fair compromise.

Another accommodation that would help would be hotel vouchers for those who can't take the constant noise, or are affected from the fumes and the dust. Some neighbors have medical conditions such as asthma. Some neighbors have special needs kids that simply can't deal with constant noise and will have tantrums as a result.

3-8

Another accommodation would be free exterminator services in case the rodents from JB go to the houses in the neighborhood during construction. My kids went to JB. They told me that they would see rats in the classrooms often. The construction will displace these rodents.

3-9

Another accommodation would be vouchers for the neighbors on Mc Cadden for car washes since I'm certain our cars will be full of dust the construction.

3-10

Another accommodation if possible would be a sound wall like what Metro is using on La Brea and Wilshire. The wall will be put up in front of the buiding that is being constructed on Mc Cadden to help block the dust and the noise.

3-11

These are just some accommodations that I thought of. Other accommodations that are thought of by others that will make the living situation more bearable would be appreciated.

3-11
cont.

I also want to bring up the design of the buildings. Putting up a three story building will over take the neighborhood and look out of place. The natural sunlight will most likely be affected. Also, John Burrough's was built in 1924. It has a beautiful vintage look. The proposed 3 story building looks way to modern and even though the architects try to say it matches, doesn't match the Administration building. The proposed building has a flat roof, which looks cheap, and a modern green facade. Everyone I show a picture to says it doesn't look right.

3-12

If the design isn't changed, at least consider changing the green facade to a color that isn't so striking and modern. Perhaps a more subtle color that matches the administration building.

These are my main concerns regarding the project. I really hope my concerns are taken seriously. Thank you.

3-13

I

Comment No. 3-1

The commenter states that they live across the street of the proposed project and have attended the various public meetings related to the project. The commenter states their concerns regarding the location of the carline including traffic and safety issues on McCadden Place. The commenter suggests moving the proposed carline on McCadden Place to be incorporated into the existing parking lot of John Burroughs and make it so buses will enter and exit on John Burroughs off Wilshire Boulevard. Additionally, the commenter suggests other options be proposed to remove traffic impacts on McCadden Place.

Response to Comment No. 3-1

As stated on page 3.7-7 of the Draft EIR, the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as eliminating school buses loading on McCadden Place would improve traffic flow along McCadden Place and Wilshire Boulevard.

As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. The Parking guidelines state that parents' student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to safely enter and exit the school grounds.⁵ Therefore, bringing student drop-off and pick-up internally to the existing parking lot of John Burroughs would be considered a safety issue as it does not comply with the guidelines of the School Design Guide. This Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.

Additionally, as stated on page 3.7-5 and 3.7-11 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction.

Comment No. 3-2

The commenter expresses that her concerns on the foundation of their home, rodent infestation during construction, and safety issues regarding the carline were not addressed in the Draft EIR.

Response to Comment No. 3-2

Any rodents or pests that are observed on-site would be reported to the District's Integrated Pest Management (IPM) Program. The District is committed to providing a school environment that is free

⁵ Ibid.

of pests, such as ants, cockroaches, and rodents in order to maintain the health and safety of students, staff, parents and the community.⁶ The Board of Education adopted the IPM Policy for use district-wide in March 1999. The IPM policy provides guidance and direction in managing pests, while minimizing the use of pesticides, with the ultimate goal of not using any pesticides.⁷ Additionally, LAUSD released a Pest Management Quick Remedy Guide for Site Administrators on February 1, 2009 along with a policy to provide site administrators quick reference guidelines for preventing/resolving pest issues at schools and offices.⁸

As stated on page 3.7-7 of the Draft EIR, the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as eliminating school buses loading on McCadden Place would improve circulation and traffic flow along McCadden Place and Wilshire Boulevard.

In regards to safety issues and traffic, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.

Although an internal drop-off/pick-up zone was explored during the preliminary design stages of the Project, it was eliminated from consideration due to the potential safety impacts arising from conflicts between pedestrians and moving vehicles. The Institute of Transportation Engineers (ITE) recommends a physical separation between different modes of transportation to provide safe and efficient access.⁹ Due to the size constraints of the Burroughs MS campus, the LAUSD Facilities Services Division, in consultation with the District's Office of Environmental Health & Safety, determined that an adequate separation of travel modes could not be achieved while maintaining other uses on the site. Therefore, an internal drop-off area would not be feasible without compromising the safety of students and staff.

Comment No. 3-3

The commenter discusses the various topics discussed at the meetings and expresses that the design and building upgrades were discussed and highlighted instead of discussing the potential Project impacts to residents on South McCadden Place during construction and operation.

⁶ LAUSD. Facilities Services Division, Integrated Pest Management (IPM). <https://www.laschools.org/new-site/operations-services/ipm/>. Accessed February 2020.

⁷ LAUSD. Integrated Pest Management Policy, Revised 05-23-02, https://www.laschools.org/documents/download/maintenance_&_operations/ipm_documents/meeting_agendas/IPM_Policy.pdf?version_id=308093689. Accessed February 2020.

⁸ LAUSD Policy Bulletin. Pest Management Quick Reference Guide for Site Administrators, February 1, 2009. <https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/135/pdf%20files/BUL-4570.0.pdf>. Accessed February 2020.

⁹ Institute of Transportation Engineers. "Safe Routes to School Briefing Sheets: School On-Site Design." <https://www.ite.org/pub/?id=c2660aa0%2D2354%2Dd714%2D510d%2D6a9acd049d40>

Response to Comment No. 3-3

The proposed Project is a standard construction project consisting of demolition, new construction, renovations to existing buildings, and site work. There are no anticipated extenuating circumstances that would cause this project to create impacts beyond a normal construction project in the City of Los Angeles. The Project will comply with all City of Los Angeles requirements for construction activities, including, not limited to, the City's noise ordinance, SCAQMD dust control requirements, SUSMP best management practices, and the requirements of the traffic control plan. In general, construction related impacts are considered to be temporary and expected to vary depending on the phase of construction.

The City of Los Angeles Noise Ordinance is from 7:00 a.m. to 9:00 p.m., Monday through Friday, and then 9:00 a.m. to 6:00 p.m. on Saturdays, and not allowed on the holidays and Sundays. Additionally, as discussed on page 3.6-23, a 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA. A noise barrier of this type would be installed along the Project perimeter to ensure that construction noise is reduced, as required by LAUSD Standard Conditions. The noise barrier will not be permanent, and will only be installed for the duration of -construction activities. Additionally, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan prior to construction.

Comment No. 3-4

The commenter expresses neighborhood concerns regarding construction work trucks parking on McCadden Place and the parking impacts that would result from those trucks.

Response to Comment No. 3-4

It is not anticipated that construction related vehicles will impact street parking. LAUSD provides contractual requirements for Contractors on all projects. For this project all construction related vehicles, including workers private vehicles, would be required to park in areas that avoid or limit disruptions to the existing street parking, to the extent feasible.

In addition, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.¹⁰

¹⁰ LAUSD. Facilities Services Division, School Design Guide, <https://www.laschools.org/new-site/asset-management/school-design-guide>.

Comment No. 3-5

The commenter expresses concern regarding noise impacts as a result of construction activities for the proposed project during the five-year construction period.

Response to Comment No. 3-5

In general, construction related impacts are considered to be temporary and are expected to vary depending on the phase of construction. While noise and vibration impacts would be greatest during demolition and earthwork activities, interior work would be less impactful. As discussed on page 3.6-23 of the Draft EIR, LAUSD Standard Conditions SC-N-8 and SC-N-9 require site-specific noise control measures to be implemented during construction. Measures to be considered and implemented would include, but would not be limited to, installation of exhaust muffles, proper maintenance of construction equipment, and use of noise barriers. The use of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA (see page 3.6-23). As shown in Table 3.6-7 (page 3.6-23), construction noise would exceed applicable thresholds along McCadden Place. Therefore, all feasible noise reduction measures would be implemented to reduce impacts to less-than-significant levels.

Comment No. 3-6

The commenter expressed concern of air quality and the dangers of pollutants and toxins from the proposed project construction.

Response to Comment No. 3-6

As discussed on page 3.2-29 of the Draft EIR, impacts related to the potential exposure of sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs) would be less than significant. Project construction would be subject to all applicable rules and regulations set forth by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). Specifically, diesel-powered equipment and vehicles would be subject to CARB idling limitation as well as engine standards and SCAQMD rules regulating toxic emissions from demolition, construction, and earth-moving activities. Adherence to applicable rules and regulations in addition to LAUSD Standard Conditions would ensure that impacts related to dust and toxic emissions would be less than significant.

Comment No. 3-7

The commenter wants to know if there will be any accommodations for the neighbors living of the 600 block of S. McCadden Place. In addition, the commenter suggests that parking permits be issued to the neighbors to park on John Burroughs' parking lot.

Response to Comment No. 3-7

As previously noted, it is not anticipated that construction related vehicles will impact street parking. Per LAUSDs contractual requirements, all construction related vehicles, would avoid or limit impacts

to available street parking, where feasible. Preferential parking districts are designated by the City Council. In order to request a preferential parking district, please contact your local City Council office.

Comment No. 3-8

The commenter suggests that hotel vouchers be granted to neighbors in order to accommodate noise, dust, and fumes of construction.

Response to Comment No. 3-8

The proposed Project is a standard construction project consisting of demolition, new construction, renovations to existing buildings, and site work. There are no anticipated extenuating circumstances that would cause this Project to create impacts beyond a normal construction project in the City of Los Angeles. The Project will comply with all City of Los Angeles requirements for construction activities, including noise ordinance and standard conditions. The City of Los Angeles Noise Ordinance is from 7:00 a.m. to 9:00 p.m., Monday through Friday, and then 9:00 a.m. to 6:00 p.m. on Saturdays, and not allowed on the holidays and Sundays. Additionally, as discussed on page 3.6-23, a 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA. A noise barrier of this type would be installed along the Project perimeter to ensure that construction noise is reduced, as required by LAUSD Standard Conditions. The noise barrier will not be permanent, and will only be installed for the duration of construction activities.

As described on pages 3.2-21 and 3.2-22 of the Draft EIR, the Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 and implement SC-AQ-2 through SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing onsite dust emissions during soil removal. These methods would include: maintain slow speeds for vehicles, applying water/mist to dirt as it is loaded and unloaded, minimize soil drop heights, covering haul truck loads, and using polyethylene sheeting to cover excavated areas and dirt stockpiles. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features, including, but not limited to: restricting diesel engine idling times to no more than five consecutive minutes, utilizing ultra-low sulfur diesel fuel, utilizing off-road construction equipment that is compliant with Tier 3 engine standards at a minimum, applying soil stabilizers, replacing ground cover as soon as possible, and installing wheel washers. Compliance with these requirements is consistent with, and meets, or exceeds, the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

Comment No. 3-9

The commenter suggests that exterminator services should be provided for the nearby residents by LAUSD in case the rodents from Burroughs MS go to the houses in the neighborhood during construction.

Response to Comment No. 3-9

There are no anticipated extenuating circumstances that would cause this Project to create impacts beyond a normal construction project in the City of Los Angeles. The Project will comply with all City of Los Angeles requirements for construction activities.

Comment No. 3-10

The commenter suggests that car wash vouchers be granted by LAUSD to neighbors in order to accommodate the dust accumulated on cars from construction.

Response to Comment No. 3-10

There are no anticipated extenuating circumstances that would cause this Project to create impacts beyond a normal construction project in the City of Los Angeles. The Project will comply with all City of Los Angeles requirements for construction activities.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 3-11

The commenter suggests that a sound wall be placed, similar to what Metro is using on La Brea and Wilshire, in order to block the dust and noise.

Response to Comment No. 3-11

As discussed on page 3.6-23 of the Draft EIR, LAUSD Standard Conditions N-8 and N-9 require site-specific noise control measures to be implemented during construction. Measures to be considered and implemented would include, but would not be limited to, installation of exhaust muffles, proper maintenance of construction equipment, and use of noise barriers. The use of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA (see page 3.6-23). As shown in Table 3.6-7 of the Draft EIR (page 3.6-23), construction noise would exceed applicable thresholds along McCadden Place. Therefore, all feasible noise reduction measures would be implemented to reduce impacts to less-than-significant levels.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 3-12

The commenter expresses concern for the design of the buildings. The commenter discusses how the 3-story building would affect the overall character and would affect the natural sunlight. Additionally, the commenter expresses that the design of the building is too modern in comparison to the existing vintage look of the administration building and suggests changing the green façade to a color that is subtle.

Response to Comment No. 3-12

As described in Chapter 3.1, Aesthetics, pages 3.1-8 and 3.1-9 of the Draft EIR, the proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. For example, the Project design team included a qualified historic architect who provided input on the design throughout the planning process. The Project objectives and designs have been extensively reviewed by the design team to provide a design that was sensitive to the historic nature of the campus and that met the current and future academic, programmatic, and operational needs of the students and campus. The new buildings have been designed to be compatible with Burroughs MS in terms of scale, materials, and landscaping.

The Project would also implement SCs that are designed to retain the visual character and quality of the site. Implementation of SC-AE-1 requires consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review. SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1, reuse rather than destruction of historic resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible. SC-AE-2 includes design measures and use of materials to reduce aesthetic impacts to deter vandalism. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to the campus layout, height of buildings, and/or architectural style of buildings. SC-AE-5 and SC-AE-6 requires reduction of lighting intensity from new sources on adjacent residences and measures to minimize the impact of lighting styles and technologies to sky glow, respectively.

The Project design would also be designed to avoid significant impacts to historic resources. As a result of the CEQA scoping process, the scope of the Project was modified to retain all four primary contributor buildings to the Burroughs MS Historic District as opposed to demolition. LAUSD SC-CUL-1 and SC-CUL-2 would ensure the proposed modernization of contributors and the design of new buildings would conform to the Secretary of the Interior's Standards for Rehabilitation (SOI Standards). Specifically, Standards 9 and 10 for new construction (as discussed in the Historic Resources Technical Report for the Project Draft EIR Appendix E2), and LAUSD SC-CUL-2 require for the treatment of historical resources under the guidance of a qualified historic architect. The view of Building B (three-story building) from the right-of-way would show proportional massing, design, and material finish that would resonate with the existing historical brick masonry buildings. Figure 3.1-1 of the Draft EIR illustrates the view of Building B from South McCadden Place. Additionally, SOI

Standard 9 states that new construction shall be differentiated from the old, meaning compatibility does not necessarily have to match the historic style.¹¹ Compliance with the SOI Standards would ensure less than significant impacts to historic resources.

As described on page 3.1-11 and exhibited in Appendix C of the Draft EIR, the development of new Building A would not contribute to new shading offsite since it would be marginally taller than the existing Shop Building to the east. Furthermore, the development of new Building B would also not contribute to new shading of offsite shadow-sensitive uses for more than three hours between 9:00 a.m. and 3:00 p.m. during October – April, or for more than three hours between 9:00 a.m. and 5:00 p.m. during April-October, as depicted in Appendix C of this Draft EIR. No other shading to sensitive receptors would occur during the winter solstice.

Therefore, the proposed buildings on the Campus would not increase or alter the shading of nearby shadow-sensitive uses based on the significance thresholds. Impacts related to shade and shadows would be less than significant. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Comment No. 3-13

These are my main concerns regarding the project. I really hope my concerns are taken seriously. Thank you.

Response to Comment No. 3-13

This comment is a conclusion to the letter. The comment is noted and will be provided to the decision makers for review and consideration.

¹¹ National Park Service, Secretary of the Interior's Standards for Rehabilitation, <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>. Accessed May 8, 2020.

COMMENT CARD / TARJETA DE COMENTARIO

Comment No. 4

John Burroughs Middle School Comprehensive Modernization Project Proyecto de Modernización Integral de la Escuela Intermedia de Burroughs

Name / Nombre: Hannah Barukh

Affiliation / Afiliación:

Address / Dirección: 659 S. Mc Cadden Pl

Comment / Comentarios:

1. Traffic is crazy when school lets out. I went to JB and I saw a lot of near misses when my friends got out of school, ^{the} car line should be moved to the parking lot of JB. The entrance & exit will be on Wilshire.

CEQA document can be viewed at <http://achieve.lausd.net/CEQA>

Written comments must be received no later than December 16, 2019 at the following address:

Envia su comentarios antes de 16 de diciembre, 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety

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

Attn: Edward Paek

or CEQA-comments@lausd.net

2. Noise - There needs to be a ^{sound} wall on Mc Cadden where the new building is being built. Also sound blankets, sound monitoring, acoustic paneling, sound curtains & sound absorbers.

3. Residents of ~~Mc C~~ the 600 block ~~of~~ of South Mc Cadden should have permits to park in JB's parking lot.

4. The design is a modern design ~~in a~~ ~~neighborhood~~ JB was built in 1924 (almost 100 years ago). The buildings don't match! Change the design. If you can't change the design, change the green color to a flat more modest color like brown.

5. Worried about safety from environmental hazards (lead, toxins etc) I want regular reports from those who regulate ~~the~~

6. Construction will hurt my foundation

Comment No. 4-1

The commenter expresses concern towards traffic impacts and suggests the location of the carline be moved to the parking lot of John Burroughs.

Response to Comment No. 4-1

As stated on page 3.7-7 of the Draft EIR, the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as taking the school buses off McCadden Place will improve traffic flow. As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. The Parking guidelines state that parent's student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to safely enter and exit the school grounds.¹² Therefore, bringing student drop-off and pick-up internally to the existing parking lot of John Burroughs would be considered a safety issue as it does not comply with the guidelines of the School Design Guide. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.

Although an internal drop-off/pick-up zone was explored during the preliminary design stages of the Project, it was eliminated from consideration due to the potential safety impacts arising from conflicts between pedestrians and moving vehicles. The Institute of Transportation Engineers (ITE) recommends a physical separation between different modes of transportation to provide safe and efficient access.¹³ Due to the size constraints of the Burroughs MS campus, the LAUSD Facilities Services Division, in consultation with the District's Office of Environmental Health & Safety, determined that an adequate separation of travel modes could not be achieved while maintaining other uses on the site. Therefore, an internal drop-off area would not be feasible without compromising the safety of students and staff.

Additionally, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction.

¹² LAUSD, 2019. Facilities Services Division, School Design Guide Documents, <https://www.laschools.org/new-site/asset-management/school-design-guide>. Accessed May 8, 2020.

¹³ Institute of Transportation Engineers. "Safe Routes to School Briefing Sheets: School On-Site Design." <https://www.ite.org/pub/?id=c2660aa0%2D2354%2Dd714%2D510d%2D6a9acd049d40>

Comment No. 4-2

The commenter expresses concern of noise impacts and suggests a sound wall be placed on McCadden Place where the new buildings would be built. The commenter also suggests sound blankets, sound monitoring, acoustic paneling, sound curtains, and sound absorbers.

Response to Comment No. 4-2

As discussed on page 3.6-23 of the Draft EIR, LAUSD Standard Conditions SC-N-8 and SC-N-9 require site-specific noise control measures to be implemented during construction. Measures to be considered and implemented would include, but would not be limited to, installation of exhaust muffles, proper maintenance of construction equipment, and use of noise barriers. The use of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA (see page 3.6-23). As shown in Table 3.6-7 of the Draft EIR (page 3.6-23), construction noise would exceed applicable thresholds along McCadden Place. Therefore, all feasible noise reduction measures would be implemented to reduce impacts to less-than-significant levels.

Comment No. 4-3

The commenter suggests that parking permits be issued to the residents of the 600 block of South McCadden Place to park on John Burroughs' parking lot.

Response to Comment No. 4-3

As previously noted, it is not anticipated that construction related vehicles will impact street parking. Per LAUSD's contractual requirements, all construction related vehicles, would avoid or limit impacts to available street parking, where feasible. Preferential parking districts are designated by the City Council. In order to request a preferential parking district, please contact your local City Council office.

Comment No. 4-4

The commenter expresses concern for the design of the buildings and that the design is too modern in comparison to the look of the existing building and suggests changing the green color to a modest color.

Response to Comment No. 4-4

As described in Chapter 3.1, Aesthetics, pages 3.1-8 and 3.1-9 of the Draft EIR, the proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. For example, the Project design team included a qualified historic architect who provided input on the design throughout the planning process. The Project objectives and designs have been extensively reviewed by the design team to provide a design that was sensitive to the historic nature of the campus and that met the current and future academic, programmatic, and operational needs of the students and campus. The new buildings have been designed to be compatible with Burroughs MS in terms of scale, materials, and landscaping.

The Project would also implement SCs that are designed to retain the visual character and quality of the site. Implementation of SC-AE-1 requires consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review. SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1, reuse rather than destruction of historic resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible. SC-AE-2 includes design measures and use of materials to reduce aesthetic impacts to deter vandalism. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to the campus layout, height of buildings, and/or architectural style of buildings. SC-AE-5 and -6 requires reduction of lighting intensity from new sources on adjacent residences and measures to minimize the impact of lighting styles and technologies to sky glow, respectively.

The Project design would also be designed to avoid significant impacts to historic resources. As a result of the CEQA scoping process, the scope of the Project was modified to retain all four primary contributor buildings to the Burroughs MS Historic District as opposed to demolition. LAUSD SC-CUL-1 and SC-CUL-2 would ensure the proposed modernization of contributors and the design of new buildings would conform to the SOI Standards. Specifically, Standards 9 and 10 for new construction (as discussed in the Historic Resources Technical Report for the Project Draft EIR Appendix E2), and LAUSD SC-CUL2 require for the treatment of historical resources under the guidance of a qualified historic architect. The view of Building B (three-story building) from the right-of-way would show proportional massing, design, and material finish that would resonate with the existing historical brick masonry buildings. Figure 3.1-1 of the Draft EIR illustrates the view of Building B from South McCadden Place. Additionally, SOI Standard 9 states that new construction shall be differentiated from the old, meaning compatibility does not necessarily have to match the historic style.¹⁴ Compliance with the SOI Standards would ensure less than significant impacts to historic resources.

Comment No. 4-5

The commenter expresses health and safety concerns from environmental hazards such as lead and toxins and would like to see regulatory reports.

Response to Comment No. 4-5

The proposed Project would be required to clean up contaminants prior to construction. Site cleanup is detailed in the Final Draft Removal Action Workplan (RAW) (Appendix H of the Draft EIR), prepared by Leighton Consulting, Inc. As summarized in Section 3.5 of the Draft EIR (pages 3.5-19 and 3.5-20), contaminants of concern (COC) that have been identified within the impacted soil include arsenic and lead. In order to minimize and/or eliminate dust during soil excavation and removal,

¹⁴ National Park Service, Secretary of the Interior's Standards for Rehabilitation, <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>. Accessed May 8, 2020.

suppressant foam, water spray, and other forms of vapor and dust control may be required. Confirmation soil sampling and analysis would be conducted to verify soil impact contamination at the excavation bottom and sidewalls.

Regulations establish specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. All RAW contractors and subcontractors would be responsible for operating in accordance with the most current requirements of Title 8, CCR (i.e., General Industry and Construction Safety Orders) ([Section 5129]), Title 29 of the Code of Federal Regulations (i.e., Standards for Hazardous Waste Operations and Emergency Response [Section 1910.120] and Construction Industry Standards [Section 1926]), SCAQMD Rules 403 and 1466 (dust control and air monitoring, see Section 3.2 Air Quality), and other applicable federal, State and local laws and regulations. All personnel would operate in compliance with all California OSHA requirements.

The Project would be in compliance with all applicable federal, state, and local requirements concerning the use, storage, transport and management of hazardous materials. Construction in conformance with standard regulatory compliance measures is adequate to reduce the potential risk hazards associated with construction activities.

Comment No. 4-6

The commenter expresses concern regarding project construction impacts on the foundation of their home.

Response to Comment No. 4-6

As discussed in Chapter 3.6, Noise of the Draft EIR on pages 3.6-26 through 3.6-28, the vibration impact threshold for the offsite structures would be 0.2 in/sec peak particle velocity (PPV). The PPV level of a large bulldozer at 25 feet would be 0.089 in/sec PPV. In order to exceed 0.2 in/sec PPV, a large bulldozer needs to be as close as 15 feet from the offsite structures. The closest offsite structure to the Project site is located approximately 25 feet away. Therefore, Project-related vibration levels of 0.2 in/sec PPV, or greater, would not be experienced at offsite structures and impacts would be less than significant.

COMMENT CARD / TARJETA DE COMENTARIO

Comment No. 5

John Burroughs Middle School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Escuela Intermedia de Burroughs

Name / Nombre: HOWARD C. MANDEL

Affiliation / Afiliación: Neighbor

Address / Dirección: 6390 SOUTH June Street

Comment / Comentarios: The population of JB is too large

LAUSD would be smarter to

Rebuild a smaller footprint

and save \$\$\$\$. These funds

could help students in other school.

Middle school population is decreasing city wide

Your plan will result in kids squandering time/druny

CEQA document can be viewed at <http://achieve.lausd.net/CEQA>

Written comments must be received no later than December 16, 2019 at the following address:

Envia su comentarios antes de 16 de diciembre, 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety

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

Attn: Edward Paek

or CEQA-comments@lausd.net

5-1

Comment No. 5-1

The commenter expressed that the population at John Burroughs is too large. The commenter suggests that LAUSD rebuild the proposed project to a smaller footprint to save money. The commenter states that the funds would help students in other schools. Additionally, the commenter states that middle school population is decreasing citywide and that the plan would result in kids squandering time driving to John Burroughs.

Response to Comment No. 5-1

The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population. Further, the enrollment boundary for LAUSD would not change as a result of the Project.



CEQA PUBLIC MEETING

John Burroughs Middle School

COMPREHENSIVE MODERNIZATION PROJECT

THURSDAY, NOVEMBER 21, 2019

6 p.m.

**John Burroughs Middle School Auditorium
600 S. Mc Cadden Place Los Angeles, CA 90005**

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PRESENTATION OF CEQA EIR
JOHN BURROUGHS MIDDLE SCHOOL
Hancock Park, California
Thursday, November 21, 2019
6:06 P.M. - 7:52 P.M.

BY:
CARRIE D. NAHMIAS
CSR NO. 11816

1 HANCOCK PARK, CALIFORNIA; THURSDAY, NOVEMBER 27, 2019,

2

3 DR. MARTINEZ: Good evening and welcome to the
4 John Burroughs Middle School. My name is Steve Martinez;
5 I am the principal of John Burroughs Middle School.

6 I was just sharing with someone that I've been
7 here 21 years and I first started in the basement down
8 below the auditorium, and have, obviously, moved offices
9 throughout my tenure.

10 I am very happy to be here tonight, very happy
11 to see the community members here.

12 Are there any JB alumni? I'm always happy to
13 meet our JB alumni. Are there any here tonight? No?

14 So we do have restrooms in the back. If you
15 need to use the restroom, they're in the back.

16 There are a couple highlights on what we've been
17 doing. We are a 2019/2020 California Schools To Watch.
18 It's a top honor to have amongst the public schools in
19 the State of California. We traveled to Sacramento to
20 receive that award. I'm very proud of that.

21 We also very recently received a Verizon grant,
22 which brought brand-new iPads for all of our students, so
23 we are one-to-one iPad school. You may remember LAUSD
24 had a little drama with the iPads they purchased five
25 years ago and they did not renew the funds for that.

1 And so when we applied for the grant with
2 Verizon, we were very happy to receive that grant.

3 We have received a couple of items that we are
4 providing for our students through the iPads.

5 We're also very happy to report that our
6 All-Girls STEM Club & Robotics Team is competing for a
7 chance to either go to Texas, Japan, or LegoLand to
8 compete; they won the L.A regional round.

9 So we are very happy for them. Only our second
10 year and the girls' team is what brought in first place.

11 And a couple -- a lot of things, I will just
12 mention, we are possibly the only middle school in LAUSD
13 that has a virtual reality, augmented reality lab. Full
14 lab for all students to use.

15 So we are very happy. And we are hoping to make
16 the community proud by bringing in these awards. And
17 offering a really quality public education to Los
18 Angeles.

19 I want to thank you for being here. And I think
20 that's pretty much it.

21 MS. AKINS: Thank you, Dr. Martinez. Good
22 evening, my name is Teresa Akins. Welcome to John
23 Burroughs Middle School.

24 I am the community outreach organizer for the
25 Comprehensive Modernization Project here at John

1 Burroughs.

2 So we have been on this journey of planning and
3 getting this project together for quite a long time. Our
4 first community meeting was back in 2015, and it has been
5 a long journey for you, for me, for us and for everyone.

6 And you guys have answered the call of
7 participation. We have shared aspects of the project
8 with you; you have told us what you think. And including
9 some issues that you wish we would contain and resolve in
10 the project.

11 And we have had meetings in meetings. So thank
12 you. Thank you for participating. Thank you for showing
13 up; we appreciate you.

14 Tonight we have a full agenda. Our team will
15 provide a brief recap of the project scope and the
16 project budget and the project timeline.

17 Also we will share with you the updated design
18 for the project. And the meat of the meeting is OEHS
19 presenting their draft EIR document. As well as
20 officially taking your comments from that document for
21 that document as related to the EIR document.

22 So that's the meat of the meeting. Let's see,
23 if you guys sign in legibly, I will make sure to invite
24 you to future meetings. I will make sure to invite you
25 to the modification when we vote on this project.

1 So you will know how to get there, when we're
2 going to address the issue, and where to park. So make
3 sure you sign in legibly.

4 So right now we're going to have Scott
5 Singletary, the Regional Facilities Development Manager;
6 he's going to go over the project overview. Scott?

7 MR. SINGLETARY: Thank you, Teresa. Welcome,
8 everyone.

9 It's wonderful to see many faces that I have
10 seen before for a few years; we have been on the -- as
11 Teresa mentioned, the path to a redevelopment project
12 here at Burroughs Middle School, which we have been very
13 excited about. We appreciate your participation in our
14 project. So thanks for being here.

15 Back in 2016, we went to the Board of Education.
16 Burroughs being one of, initially, 11 schools in the
17 district to get identified for a comprehensive
18 modernization project. The other 11 schools -- or, ten
19 schools that were in that first round, some are actually
20 under construction.

21 We have another 11 schools, so we're up to 22
22 that are now in process for major modernization. That's
23 22 schools of well over 600. So Burroughs is right the
24 in the front line.

25 It's a school that's been around for close to

1 100 years. It's time for it to have a new life and go on
2 for the next 100 years.

3 We are excited about this project.

4 We have prioritized our school sites. The 22
5 schools receive modernization projects based on their
6 physical conditions. We, at Facilities, use analytics
7 and metrics to study the general conditions of our
8 campuses, the strength of our buildings, the upgrades
9 that need to be done.

10 We have looked at density; we've looked at how
11 many portables have been placed on a campus over the
12 years. And we have come up with a metric to rate our
13 campuses, which is how Burroughs came to the top of the
14 list.

15 It's a fantastic school, and Dr. Martinez has
16 done a spectacular job, but really we are here because
17 of the buildings and because of the grounds.

18 So the major findings that lead to our scope of
19 work are articulated in this slide, many of you have
20 probably seen it before.

21 But there, to orient your eyes, the purple
22 buildings, which you see up here, this represents -- this
23 is the administrative and auditorium building.

24 We are currently in the auditorium, right about
25 there. And this is the beautiful building that's

1 historic. It sits right on McCadden as you pass by the
2 school, along with the classroom building, which is
3 connected by a bridge on Sixth Street, which faces Sixth
4 Street.

5 These purple buildings, the gym, the shop, and
6 the cafeteria and girls' locker building, were identified
7 for a seismic evaluation, a study for seismic strength.

8 And during that evaluation, we determined that
9 all of them need certain levels of upgrade and retrofit.

10 The building that you see with a slash going
11 through it; I know it's hard to read, but it's the
12 administrative-auditorium building, that classroom
13 building, the shop and the gymnasium, are part of the
14 original historic district that make up the campus.

15 They were identified as the contributors to
16 making up that historic district Burroughs Middle School.

17 The orange buildings that you see are all the
18 portables that we have scheduled for removal as part of
19 this project.

20 And so you can see, over the years portable
21 buildings were added into the quad, on the outskirts of
22 the campus, and then what leads into the athletic areas.

23 And so those buildings we studied and determined
24 should be removed along with the project. Also in this
25 project, we will be addressing accessibility constraints,

1 the constraints for the handicapped, that are on the
2 campus.

3 We have got a lot of infrastructure on this
4 campus, close-to-100-years-old campus, that needs a new
5 life. And so we'll be doing a ton of work underground
6 that folks might not see, but will keep the project --
7 the -- the school running successfully for many years.

8 There's also, we have a vehicular congestion
9 within the campus; cars currently parked throughout the
10 student areas. And so we'll be removing that and hoping
11 to address some campus security, providing more security
12 in front of the campus, to control visitors from entering
13 the school.

14 Our scope of work that we presented to you
15 previously is represented on this slide, what you see in
16 blue is the auditorium, administrative building,
17 classroom building and gym that are scheduled for
18 retrofit and renovation, buildings to be retained.

19 And we have a level of retrofit taking place
20 allowing us to bring these wonderful buildings back to
21 life in the 21st Century.

22 So the insides of the classrooms will be
23 relative to how we teach and learn in the 21st Century
24 and the historic buildings will also be retained as well.

25 The scope of work that you have previously seen,

1 included the cafeteria, classroom building, the girls'
2 lockers and the shop building being removed from the
3 campus, along with the portable buildings that you saw in
4 orange previously.

5 We have studied that scope of work extensively;
6 we were out here for a CEQA scoping meeting, which was
7 the last time we presented to you folks. We have gone
8 back, and based on comments and feedback, and the
9 evaluation of the CEQA study, reanalyzed, particularly
10 the removal of the shop building.

11 And so tonight we're going to show you -- before
12 I go there, we are going to show you a design where we
13 are now intending to keep the shop building, but I want
14 to recall back to the design that you've previously seen,
15 which included the removal of the shop building and the
16 development of a two-story-ten-classroom building, in
17 this footprint creating a quadrant or a quad.

18 This is a two-story classroom building over the
19 cafeteria, on the bottom part and locker rooms. And
20 you'll see this building continuing in the design.

21 Out here is the old design, Maintenance &
22 Operations building. With our new effort to study the
23 site, we've been able to work it so that we can move
24 Maintenance & Operations into the basement. Dr.
25 Martinez's original office in his first year of his 21

1 years. So we have been able to modify.

2 So this is our new scope of work and it has been
3 evaluated in the draft EIR.

4 The change that you see is that the shop
5 building is now colored blue, meaning it will be
6 renovated, retrofitted, and modernized. It will have
7 seven classrooms in it.

8 Russell McCarty, he is a senior design editor,
9 will be up in a minute to walk you through this
10 design with you guys.

11 You can see all the rest of the scope basically
12 remains intact. And so we have been continuing on the
13 project. We've got a bit of a challenge and we hope it's
14 for the best.

15 And here's a quick image of what we have come up
16 with for a new site design that allows the shop building
17 to be retained.

18 We have some very exciting development actually
19 happening in the quad to bring in some of the more
20 specialized uses on this campus, including our dance
21 program, our Music & Makers Mix, which is Engineering &
22 Robotics, all happening in a very active place with that
23 quad landscape that supports teaching and learning
24 indoors and outdoors with a great feel on the campus.

25 So with that, I am going to bring up Russell

1 McCarty. And he's going to walk through our design.

2 MR. McCARTY: Thank you, Scott. Hello,
3 everyone. It's great to be here to be able to show you
4 some updates. A lot of what you will see was presented
5 before and is a continuation of the design, but as Scott
6 pointed out, there are several key things that are new
7 that will be shown.

8 Just to get our bearings straight, obviously we
9 know the Hancock Park neighborhood, the school site,
10 Wilshire Boulevard, here. We will be zooming in. The
11 streets. Wilshire, McCadden, Sixth Street.

12 And then you can see the existing campus here
13 where the modulars are. The four historic buildings,
14 food service, girls' locker room, play field and parking.

15 You can see the parking right now, a lot of
16 times, is actually in the play field, which we want to
17 correct.

18 This diagram shows the buildings that are being
19 renovated in orange. And the yellow buildings are also
20 remaining, and they're just getting a little touchup. So
21 some system upgrades and mostly paint and finishings.

22 The gray building on this diagram showing
23 buildings that are being removed. You can see all the
24 modulars, the girls' lockers, food service and some other
25 peripheral buildings.

1 When we do that and finish the project, this is
2 the site now that we will be seeing. And keeping with
3 the original concept, we have the three historical
4 buildings that are being renovated; the new shop building
5 now will be renovated. We still have the three-story
6 building over here.

7 And we have these two new buildings in the quad
8 that have three classrooms. We will show you how those
9 lay out. We have still have a park over here. We have
10 the field and the parking. We have bus drop-off.

11 So here we have ins and outs of Wilshire, which
12 will keep most of the traffic in and out of the parking
13 onto Wilshire.

14 And then the bus drop-off and pick-up, busses
15 will be there only in the morning at drop-off or in the
16 afternoon at pick-up. The rest of the day there will be
17 additional parking. So we can transition this space
18 right here into added parking.

19 We also have parking off Sixth Street. This is
20 a historic view of the campus, and you can see the
21 buildings around the perimeter, the four, with also a
22 cafeteria building in the center.

23 We're showing this, 'cause this is a precedent
24 for our attempt now to keep the shop and add classrooms
25 in the center.

1 Site Design Elements.

2 When we add the buildings -- when we add the
3 buildings in the quad, we're shaping the buildings to
4 allow for some outdoor space related to the three
5 classrooms. And these are specialty classrooms.

6 We have a music classroom with an outdoor space.
7 We have drama with an outdoor space, and we have a bigger
8 space, which will be supporting the robotics and things
9 that they've been just doing very successfully here.

10 Then there's landscape development that further
11 differentiates the design of the quad.

12 Trees, we've done, we have had arborists come
13 and do studies on all the trees on the campus. We have
14 119 trees on the campus and we have 37 along the
15 property.

16 However, these are protected trees. We have a
17 protected tree over here along Sixth Street. And we have
18 a protected tree in the parking lot.

19 These protected trees, they're oaks, which can
20 be saved easily. This is next to the historic building.
21 One, unfortunately, in the parking here is going to be
22 right in the middle of the soccer field, so we are not
23 able to keep that, but we'll be replacing it with four
24 new oak trees.

25 This is a diagram of the trees that we'll be

1 removing for the new project. Again, showing the
2 protected trees that we're keeping here. This tree will
3 be removed. The area circled with orange, we're studying
4 how to keep those. We're going to keep as many of them
5 as possible.

6 The reason we can't determine that right now is
7 when we do the demolition of this building and the paving
8 when we demo, you have to then understand the
9 restructure, how much of the restructure are under
10 walkways, walls, things like that.

11 Once we study that, we can determine whether or
12 not we can save these trees and how many of them we can
13 save.

14 Some of them we will be able to save. Also of
15 this area in the back. So again, those trees are likely
16 to be able to be saved. We still have to study their
17 root structures for the same reasons.

18 This is a development showing you new trees. Of
19 course this is gonna change because a lot of these trees
20 we're going to try to save. So we're trying to protect
21 those trees.

22 Because you can see we're adding a lot of trees
23 in and around the buildings. Trees to keep heat off the
24 parking lot, minimum as possible. Some trees in the
25 playground to provide shade, and trees in the quad to

1 subdivide space and add comfort to the architecture.

2 Again, look at the plan as a reminder. So views
3 along McCadden, this is the same architecture we have
4 seen before.

5 So when we put some trees. This is looking
6 towards the three-story building, and right now there's a
7 lot of trees and there will be in the future. So we can
8 see that there is heavy vegetation.

9 COMMUNITY MEMBER: Is that McCadden?

10 MR. McCARDY: What's that?

11 COMMUNITY MEMBER: Is that McCadden?

12 MR. McCARDY: That's McCadden. We are
13 introducing a wall or brick. The brick will be a similar
14 color and texture to the historic.

15 Then we have some green tile that encloses the
16 stairwell, and you can see there's some beige and
17 light-colored panels. This is the classroom for the
18 second and third floor.

19 You can't really see the lunch shelter because
20 it's behind the wall. Another view from the front of the
21 auditorium on McCadden and looking back at the classroom
22 building.

23 We can see the auditorium, which we're in right
24 now. This is the surface, existing the surface which
25 will remain. This is a wrought iron fence; you can see

1 the brick. And this image of the brick doesn't match
2 color, but we intend those bricks to look very similar.

3 You can then see the second-and-third story
4 classroom buildings. And the green tile here being
5 screened by the trees.

6 This is an interior view of the campus looking
7 back at the playground. Here you can see the lunch
8 shelter.

9 This is the brick. The brick composition
10 continuing around the building. This is the second and
11 third floor with these panels with the green tile accent.
12 These are classrooms. We have bridges separating and
13 combining these.

14 Below here are the lockers, boys and girls'
15 lockers. This is another green tile accent that comes
16 out with the stair behind it.

17 The other end of the classroom building. This
18 is looking from adjacent to the gym, the brick of the
19 gym. The lockers underneath.

20 This is a stairwell coming down from the
21 classrooms and the classrooms above with green tile
22 brick, similar to the other facades.

23 Here's some views of this new building we're
24 putting in the courtyard, in the quad.

25 This is a view from the gym looking back. The

1 idea is to make these little jewel boxes that sit inside
2 the quad, that are different aesthetically from the
3 doors; they don't match, but they have this tile pattern
4 that break up the wall surface to break down the scale.
5 And there will be little accent brick tiles.

6 Right in there would be the drama classroom.
7 And then there's the space outside, that can relate --
8 the drama can do outdoor performances.

9 On the side is the other quad building with the
10 music classroom itself. This is a better view of the
11 classroom, the music classroom, in the quad right here.

12 So this is the shop building, which is being
13 renovated. And this is a connection outdoor walkway
14 where you can walk, and we have enhanced restrooms in
15 this new building because the quad is -- the shop
16 building is somewhat small.

17 So we're getting as many classrooms in there.
18 So we didn't put restrooms in. We put the restrooms
19 inside this building here.

20 That is a view of the lunchroom perimeter that
21 would be adjacent to the playing field. The lunch food
22 services in here. This is a indoor dining area right
23 here. These are planned layouts of the new renovation.

24 This is the shop building where we have seven
25 classrooms; we have some support for the outdoor

1 services. We have a computer support room in here.

2 These classrooms, they're not quite as big as we
3 would like, but they are big enough to meet our needs and
4 meet the state requirements.

5 This is a diagram underneath the auditorium here
6 in the basement.

7 We will have a service elevator. That is the
8 service area above right next to it. We can just upload
9 and get products down into the basement.

10 These are the plans of the quad buildings. You
11 can see the drama classroom we are discussing, the maker
12 space. The music practice rooms and storage rooms and
13 the large restrooms.

14 So with that, I'll hand back it to Scott to talk
15 more about the schedule.

16 Thank you, everyone.

17 MS. AKINS: I just want to recognize and
18 acknowledge the Deputy Chief of staff from LAUSD from
19 George Mckenna's office, Miss Patrice McKenzie. Want to
20 thank you for coming.

21 MR. SINGLETARY: So a just bit about the
22 schedule. We've presented a similar slide a number of
23 times. The project development process when we started
24 initially approving us moving into the designing of this
25 project.

1 We are currently in the environmental review in
2 the super review. Our team is going to go through the
3 Draft Environmental Impact Report.

4 Once the Drafted Environment Report is
5 completed, there will be actions taken by the Board of
6 Education.

7 They have to vote whether to certify or not
8 certify the Environmental Impact Report. So that is
9 under the discretion of the Board of Education.

10 After the certification of the Environmental
11 Impact Report, the board will take action to actually
12 approve the project. That gives us the authority to
13 start moving bid construction contracts and continue on
14 with the project.

15 And so where we stand right here in the
16 environmental process, we're continuing in the design
17 process. And we anticipate delivering the project and we
18 can start to stagger the design so that we can accelerate
19 what will become housing, design packages.

20 And start constructing housing using Pier
21 methods to start completing the design in the project of
22 the later-phased work.

23 And so you will see an overlap between design ad
24 improvement. And anticipate starting construction once
25 we have that approval from our Division of the State

1 Architect, which is our Building & Safety, for lack of a
2 better term, at the state level.

3 We intend on starting construction while we are
4 still finishing up our approvals on the some of the last
5 pieces of design.

6 It is envisioned that this will be a multiphased
7 development; the school will stay active during
8 construction.

9 We will always maintain the same campus, the
10 same programs. It will be a tighter site. There will be
11 interim housing. There will be a restricted playground.
12 But school will never cease at Burroughs. So that's
13 where we break into different phases.

14 So right now we're looking at a
15 four-to-five-year construction process, not all
16 construction is equal. There will be early start within
17 that time frame. That is about doing underground work,
18 moving utilities around, start setting up interim
19 housing.

20 Then we move into the construction phases, which
21 will probably happen in multiple larger phases.

22 We do this construction at one time with the new
23 building, then renovations at another time of the
24 beautiful historic buildings. So it is a fairly long
25 process. I think we are starting to be dialed in.

1 I want to note we will have more meetings about
2 construction as we bring on contractors, as we learn more
3 and continue on with our internal construction folks to
4 talk really about the nuances of what'll happen during
5 construction phasing; the logistics that are going to
6 take place.

7 So there will be more meetings to discuss that
8 after this as well.

9 We do hope that around the spring, the summer of
10 2021 to start, which would be the early work. So that's
11 probably the earliest you would see construction start
12 and what's where we stand today.

13 Now I'll turn it over to Ed Paek from our office
14 of Environmental & Safety at LAUSD to take you through
15 the CEQA process.

16 MR. PAEK: Good evening, everyone. My name is
17 Ed Paek. I am CEQA project manager of the District
18 Office of Environmental Health & Safety.

19 I am joined here tonight by Gwen Godek, who is
20 our CEQA advisor, and Charles Smith, who is with the
21 consulting firm ESA. ESA's team of technical experts
22 have been helping us with the CEQA process and
23 preparation of all the CEQA documents.

24 So tonight, I'll give you a quick overview what
25 CEQA is. CEQA process. Charles will then provide a

1 summary of the draft's findings.

2 After that, we'll get into the real part of the
3 meeting, which is to get your comments on the CEQA
4 document and CEQA process.

5 CEQA stands for California Environmental Quality
6 Action, which is a state law that requires public
7 agencies to consider the environmental impact of
8 decisions that involve changes to the physical
9 environment.

10 So what does that mean?

11 In simple terms, CEQA requires that the Los
12 Angeles Board of Education consider the potential
13 environmental impact for all school construction projects
14 before making a final decision on whether or not to
15 proceed with the project.

16 Here at L.A. Unified, my Office of Environmental
17 Health & Safety is responsible for overseeing the CEQA
18 promise to ensure independent and unbiased review.

19 The ultimate goal of CEQA is to develop and
20 maintain a high quality environment.

21 This is accomplished by informing the public
22 about the project and its potential environmental
23 impacts; identifying the ways to avoid or reduce
24 environmental impacts through the allocation of standard
25 conditions of approval.

1 Mitigation measures or project alternatives.
2 Communicating any potential environmental impacts,
3 fostering participation in the planning process. Through
4 meetings like tonight.

5 Facilitating coordination between regulatory
6 agencies, and, lastly disclosing reasons why a project is
7 approved, even when it will create significant
8 environmental impacts.

9 So this project is just one of many in the
10 district school upgrade program.

11 In 2014, LA Unified certified a program EIR that
12 looked at the big picture impact of all of the district's
13 projects.

14 Therefore, this EIR will rely on some of their
15 the analysis, mitigation measures, standards and
16 conditions of approval contained in that school of
17 upgraded program, EIR.

18 So, again, the primary purpose of tonight's
19 meeting is to present a brief summary of the findings.
20 And, more importantly, to give you a opportunity to
21 provide comments on the environmental impact of the
22 project.

23 We will also outline the next steps of the
24 process and just remind you a decision on the CEQA
25 document or the findings will not be made tonight; these

1 decisions will be made on a future date by the Board of
2 Education.

3 So the CEQA project started with the preparation
4 of various technical studies, some of which you'll see up
5 here. We did, you know, arborist report, historic
6 research evaluation, geotechnical studies, noise studies.
7 We did a Phase 1 analysis. We did circulation studies.

8 So those technical studies provided a detailed
9 look at the baseline conditions of the campus.

10 These technical studies were then used to
11 prepare something called the initial study, which is
12 basically a questionnaire to determine if the project may
13 have potential environment impact in any of 21 different
14 areas.

15 Some of them include air quality, biological
16 resources, cultural resources, noise. Traffic. Among
17 others.

18 Based on the result of the initial studies, the
19 district decided to prepare an Environmental Impact
20 Report, or EIR, which is the most comprehensive level of
21 documentation required under CEQA.

22 So a Notice of Preparation of the EIR was
23 distributed to gather up agency and public comments
24 related to the scope of the environmental analysis for a
25 30-day period back in early 2018, which is when we last

1 met.

2 The comments received during the scoping
3 process, were then used to refine the project as Scott
4 mentioned earlier, and to form and draft the EIR, which
5 is now available for a 45-day public review period that
6 started on October 30th and ends on December 16th.

7 A copy of the EIR is also available online; we
8 will post the web address soon.

9 The results of the draft EIR will be the next
10 segment of the meeting. The comments we receive during
11 public review period, including at tonight's meeting,
12 will become part of the administrative report and
13 included in a document called the final EIR.

14 The final EIR will include responses to the
15 comments we receive. This document will then be
16 presented to the Board of Education before they make a
17 final decision on whether or not to approve or disprove
18 the project.

19 As you see, in the CEQA flowchart, we are right
20 here. The scoping meeting back in 2018 is right here.
21 Currently we are anticipating that the project will go to
22 the Board of Education, we are expecting, winter or
23 spring of 2020.

24 The public hearing will provide another
25 opportunity for you to share your comments on the project

1 directly to the decision makers.

2 Our Community Relations Department will keep you
3 informed of when that DOE meeting will take place.

4 I want to remind everybody, please sign in, if
5 you haven't already.

6 At this point, I will hand it over to Charles
7 Smith from ESA, who will provide a brief summary of the
8 EIR, which will then be followed by the public comment
9 portion of the evening.

10 MR. SMITH: Thanks, Ed. Again, I am Charles
11 Smith, I am with Environmental Science Associates or ESA.

12 So under CEQA, we look at different levels of
13 impacts. And the categories that are looked at, first of
14 all, are issue areas where it's determined there will be
15 no impact.

16 In other words, there is no connection between
17 the resource area and the project itself.

18 A second category is impact that's considered
19 less than significant. This is something where the
20 impact does not exceed the thresholds that are
21 established for that topic under CEQA.

22 Thirdly, there's less than significant with
23 mitigation, meaning that you are not exceeding the
24 threshold; once you apply some mitigation measures.

25 In other words, measures intended to reduce

1 potential environmental impacts.

2 And then the final category, is significant and
3 unavoidable impact, which is one that equals a threshold
4 of significance under CEQA with the implementation of
5 mitigation measures.

6 So those are important, 'cause when you look at
7 the different topics that are evaluated in the EIR,
8 you'll see that some fall in different levels here of
9 impact.

10 So I mentioned the initial study which had been
11 prepared in February of 2018. There's a initial study
12 checklist that lists all the different topics under CEQA.

13 And you can see on the slide, there is a large
14 handful of them who have either no impact or a
15 less-than-significant impact.

16 So those get a kind of a checklist-level review
17 at this time and don't need to be evaluated in
18 substantial further detail in the EIR.

19 In the draft EIR, which actually we are here to
20 discuss tonight, there's a much smaller handful of topics
21 that would have less-than-significant impacts and you can
22 see them up on the screen.

23 I will walk you through the types of things that
24 we look at for those impact areas.

25 So for example, under aesthetics, we look at

1 things like impact to visual character or the quality of
2 site surroundings. We look at things like shade, you
3 know, when buildings cast shading on an adjacent area for
4 some period of time.

5 For air quality, we look at what the project of
6 obstructing any type of air quality plan or violating air
7 quality standards.

8 We look at, you know, whether there will be a
9 violation of what are called criteria of air pollutants,
10 bullets of interest and would it expose sensitive
11 receptors to pollutants.

12 Under hazardous materials, we looked at whether
13 or not, for example, would it release hazardous
14 substances or emissions.

15 Safety, you know, would it introduce new safety
16 hazards. Transportation and traffic. We look at issues
17 like would it introduce a new safety hazard, maybe an
18 incompatible use that the project would introduce. Would
19 there be adequate room to access, you know, continued to
20 be provided by the project.

21 Also look at things like public transit or
22 pedestrian or bicycles, or create unsafe routes to the
23 school.

24 So those are types of things that we look at
25 here -- we looked at I should say.

1 And the conclusions in the draft EIR of those
2 that are less than impact. You remember we are talking
3 through the different impacts, one was less than
4 significant with mitigation.

5 And you can see, the topic that fell into that
6 category was cultural resources.

7 Here we are looking at impacts to historical,
8 archeological, or paleontological resources.

9 And what we found is that, as you can imagine,
10 any time you're doing earth work, in this case we would
11 have a potentially pretty significant impact to
12 paleontological resources. But that's mitigated through
13 the monitoring and training of construction staff.

14 And again, it's monitoring throughout
15 construction. And with that monitoring, we reduce that
16 impact to less than significant.

17 The only impact that resulted in a significant
18 impact, that was considered significant and unavoidable,
19 noise. Noise, specifically construction noise.

20 Here we looked at the impact or whether it would
21 exceed a legal noise standard. We would certainly
22 implement mitigation measures; those would include things
23 like, hours of construction, using mufflers on
24 construction equipment. Sound barriers.

25 But even in that case, we still have issue with

1 noise exceeding, you know, like, local noise standards.
2 But everything is being done to reduce that or mitigate
3 that to the extent possible.

4 There are other potential noise impacts that are
5 mitigated to less than significant. Those are things
6 like, you know, increase in noise, you know, underground
7 vibration; that's significant, it is only construction
8 period impacts; temporary.

9 So we had our presentation talking about the
10 design specifics of the project. Under CEQA, also
11 you're required to look at alteratives to the project.
12 What were some different ways that we could go at this?

13 One way we were required to look at was the No
14 Project Alternative. What if we do nothing; we just left
15 things as is? So you see that evaluated in the EIR.

16 Second one is called the Reduced Project
17 Alternative. Under this alternative, I will just read
18 you what that consists of.

19 No permanent buildings be demolished. No new
20 structure will be constructed. This is the Reduced
21 Project Alternative.

22 All portable classrooms will be removed.
23 Parking lots would not be restricted, pick-up and
24 drop-off points remain as is.

25 There would be seismic improvements made to the

1 classroom and shop building; you would need to have
2 modernization all and renovation to administration,
3 library, auditorium, music, gym, classroom building.

4 And number 7, the shop building, girls' locker
5 building. And then paint, finish, upgrades to other
6 parts of the campus.

7 Finally, and this is the third alternative here,
8 is the one that was presented in the initial study that
9 is called The Demolition of Shop Building, New Classroom
10 Building Project.

11 Again, this was looked at the initial study.
12 Activities here would include demolition of the shop
13 building, the girls' locker building, cafeteria,
14 classroom, and 16 portable buildings.

15 And then there would be construction of the two
16 brick classroom, three-story facilities building,
17 multipurpose room building, classroom-locker building,
18 operations & maintenance building.

19 These are the three alternatives that are
20 presented in the EIR, under CEQA.

21 The analysis of those alternatives is not
22 required to be at the same level of detail as for the
23 project. So we look at the draft, you will see a lot
24 more detail than you will on the alternative way it in
25 compliance.

1 With that, I will turn it back over to Ed.

2 MR. PAEK: Thank you, Charles.

3 So here we have some of the repositories where
4 you can check out a copy of the CEQA document, the draft
5 EIR. We have available a copy at of the main office
6 here.

7 We have one at our main office in downtown L.A.
8 We have one at the local district office, and also have
9 one at the local public library.

10 But, again, the easiest way to view the EIR
11 would be via on our website and the address is provided
12 right here.

13 So, again, the whole point of this meeting, or
14 the main point of this meeting, is to get your comments.
15 We know there is a high level of community interest in
16 this project.

17 So we wanted to invite everyone here tonight to
18 provide comments on the environmental issues related to
19 the project.

20 We have a court reporter present here tonight,
21 who will transcribe all of the comments, to ensure that
22 everyone is given an equal opportunity to speak.

23 We will have a timer set up for two minutes per
24 speaker. However, you are welcome to go to the back of
25 the line if you would like to share additional comments.

1 Assuming that everyone here has already read the draft EIR
2 from cover to cover.

3 Please let us know if we missed anything or if
4 you need any clarification or if you found any
5 inconsistencies in the document.

6 The whole reason we have a draft EIR is so we
7 can bring all these corrections before a final EIR is
8 presented to the Board of Education.

9 And, of course, if you don't feel comfortable
10 speaking, or you have thoughts later on, please feel free
11 to fill out a comment card and give to any of the
12 district staff, or you can also email us comments at
13 cega-comments@lausd.com.

14 We also understand that there may be some
15 non-CEQA, nonenvironmental related comments on the
16 project, you know, such as questions on the design, the
17 construction phasing, school operations, structural,
18 programs, funding.

19 But I just want to remind everyone that the
20 primary focus of tonight's meeting is to get your input
21 on the environmental analysis.

22 However, we have our fine folks from the
23 facilities team that will stick around after the meeting
24 to discuss your comments -- any questions or comments.
25 Unless, please forgive us in advance, if we have not

1 responded to your question or comment; we're not ignoring
2 you; we're trying to be respectful.

3 The primary purpose of this meeting is to
4 document your comments in writing so that they can be
5 responded to in the final EIR.

6 So with that, Teresa? We have mics set in
7 front, so again, if you would like to form a line to
8 share your comments. Please.

9 COMMUNITY MEMBER: Thank you. I have three
10 quick questions, one --

11 MR. PAEK: Actually, before you continue, please
12 just state your name and your affiliation.

13 COMMUNITY MEMBER: Sanford Moab (phonetic).
14 I am a resident of the 600 south block of
15 McCadden.

16 First question is, in the areas of the EIR, you
17 mention transportation and traffic.

18 Do I understand correctly that you are only
19 dealing with the transportation and traffic during
20 construction; yes or no?

21 MR. SINGLETARY: No.

22 COMMUNITY MEMBER: Are you dealing with
23 transportation and traffic after construction?

24 MR. PAEK: Yes, we will be -- the EIR addresses
25 construction-related traffic as well as operational

6-1

1 traffic.

2 However, we should note that the project does
3 not involve increasing enrollment at the school, so per,
4 actually, the, city of L.A. guidelines, we -- yes?

5 COMMUNITY MEMBER: Second question.

6 In your alternative section, did you -- I didn't
7 hear clearly; I'm not sure, did you identify -- did you
8 deal with the demolition of the cafeteria and the new
9 increased area of three stories of that building? I
10 didn't see that.

11 I saw you dealt with the shop and new
12 classrooms, but not the cafeteria.

13 MR. PAEK: So the Reduced Project Alternative
14 assumed that no new buildings would be built, so there
15 would be no new construction.

16 COMMUNITY MEMBER: There is new construction.
17 You're tearing down the building and building it up to
18 three stories.

19 MR. PAEK: I don't believe that's part of the --

20 MS. DUDEK; In the alternative.

21 COMMUNITY MEMBER: What is this proposed
22 project?

23 MR. PAEK: The proposed project does involve
24 demolition in the cafeteria and the classroom building
25 which is analyzed in the EIR.



6-1
cont.

1 COMMUNITY MEMBER: It is?

2 MR. PAEK: Yes.

3 COMMUNITY MEMBER: Third question, has the EIR

4 taken into account changes climate and weather changes?

5 For example, I noticed in the design, there are

6 outdoor stairs from one of the large -- or the classroom

7 buildings.

8 Has it been taken into account how the stairs

9 are constructed and covered during inclement weather?

10 MR. SINGLETARY: CEQA does look at greenhouse

11 gas emissions --

12 COMMUNITY MEMBER: I'm not talking about that; I

13 am taking about rain, outdoor stairs during rain. Also

14 specific to the outdoor lunch area. Even with those

15 covers, how would you take into account inclement

16 weather; rains, hail, whatever? While school is in

17 session?

18 MR. SINGLETARY: Great question. The stairs are

19 covered. So if they're covered from above, so the rain

20 wouldn't come down and they are shielded so the rain

21 won't get into the stairwell.

22 COMMUNITY MEMBER: The design does not show

23 that.

24 MR. SINGLETARY: They are not entirely covered.

25 COMMUNITY MEMBER: I would suggest you look at

6-1
cont.

1 that issue.

2 I know schools, not necessarily good, where
3 there are outdoor stairs. The composition of those
4 stairs, the location of those stairs, is critical to the
5 safety of the people who use those stairs.

6-1
cont.

6 COMMUNITY MEMBER: Thank you. I am Dr. Howard
7 Mandel. I live on June Street.

8 I have actually read the 272-page document and I
9 commend you for the high quality of production.

10 The problem that I have with it, is the
11 assumption that LAUSD has said that because they have
12 already been adversely impacting the environment by
13 having approximately 1,800 on this campus, that they can
14 continue to build and have the project for 1,800 kids.

6-2

15 1,800 kids is not needed. The population of
16 middle school students throughout the district has been
17 decreasing and is projected to decrease.

18 You're now building up to \$191,000,000,
19 originally your budgeted was 105 -- 110,000,000; you have
20 already blown your budget.

21 If, you instead, build the school, renovated the
22 school for approximately 1,400 students, 1,600 students
23 -- 1,400 students, one less building or two less
24 buildings.

25 You decrease the adverse impact. Currently you

1 have kids coming from 64 different zip codes to John
 2 Burroughs. It causes traffic; it hurts the environment,
 3 because of fumes from the automobiles.

4 It also destroys the health of the kids, because
 5 they're wasting over an hour, probably an hour and a half
 6 a day in commute.

7 There's no reason for it; it's a waste of money.
 8 You could build a smaller school.

9 Your project alternative didn't really address
 10 middle schools for 1,200 to 1,400 students. If you did,
 11 the community would be happier.

12 One of the last points is your changing of the
 13 baseball diamond to a soccer field.

14 You should be aware that the community actually
 15 raised the money to create that. They were promised that
 16 it will be done in perpetuity, if they raise the money to
 17 pay for its maintenance.

18 So now having the soccer field -- getting rid of
 19 the baseball diamond, they paid their own dollars for.
 20 Thank you.

21 COMMUNITY MEMBER: Well, I am not really a
 22 public speaker, but I feel I have to say something.

23 I live on the southwest corner of June and 6th
 24 Street. So I'm very familiar with the school and the
 25 traffic. And I actually had to build a fence around my

6-2
cont.

6-3

1 property, because the children would go with their bikes,
2 you know, across my lawn.

3 Other than that, I don't have a problem really
4 with the children. But I am visualizing in my garden all
5 I am going to see is these gross buildings and this is
6 not the neighborhood I moved into.

7 I mean, we have a special neighborhood here
8 that's very old, I guess, for Los Angeles. And we enjoy
9 having the ambiance that we have now.

10 And I am willing to put up with a lot of stuff
11 you know, because children have to go to school, et
12 cetera, et cetera. But I just think that the three
13 stories is not acceptable. At all.

14 As Dr. Mandel said, we don't need to have that
15 many children. Because then the traffic will be worse.
16 You all know what it's like during the beginning and end
17 of school. And we all put up with that.

18 We don't need to increase it. And although the
19 pictures we saw are very beautiful, I think it is too --
20 the density of the buildings -- not the density, the
21 height of the buildings is not acceptable to me at all.
22 It's really, really ugly.

23 And also I was wondering if I may ask a
24 question? That wall looks like a prison. Do we have to
25 have the wall around -- that you showed in the pictures?

6-3
cont.

1 Why are you building it like that?

2 FACILITIES TEAM: The reason we have added the
 3 wall is to screen some noise and activity in the
 4 playground from the neighbors. And we created it out of
 5 brick, because we thought it would be a nicer image
 6 instead of something that's concrete or just a fence. So
 7 that's what we did.

8 COMMUNITY MEMBER: Well, I wasn't questioning
 9 about the way the wall looks. It is the fact that we
 10 have a wall. Why? It looks very ugly. It looks like a
 11 prison.

12 Whether it is brick or not, it looks like a
 13 prison. We don't have this kind of neighborhood here. I
 14 think that -- and it's probably very expensive, too.

15 You said you were doing a lot of work
 16 underground. Is that parking or just --

17 FACILITIES TEAM: No.

18 COMMUNITY MEMBER: Thank you. Well, I am very
 19 unhappy about the height of the building. The insides
 20 were very attractive. And if you keep the old buildings,
 21 the original ones, that would be nice.

22 But with the wall around it, it's going to be
 23 very ugly. Thank you.

24 COMMUNITY MEMBER: Hi, I'm Nadia Farouk
 25 (Phonetic). I live across the street.

6-3
cont.

6-4

1 And I first want to say, really fast, that I
 2 submitted my concerns, my list of concerns, to the EIR
 3 scoping process.

4 And when I read the comments back, I was
 5 surprised, because a lot of my concerns weren't addressed
 6 or ignored or just said no.

7 I mentioned the noise, which they're saying they
 8 can't do anything about.

9 The car line, which I'll get back to later;
 10 ignored. I said the rat problem. The design of the
 11 project sort of staying the same. The parking. So I
 12 just wanted to put that on the record that a lot of stuff
 13 was not addressed.

14 Really fast, my neighbor is worried about the
 15 construction trucks parking on McCadden during this
 16 process.

17 They said that if -- they can't do anything
 18 about it. And so I am suggesting a -- I am just trying
 19 to find solutions, that the residents of the 600 block of
 20 South McCadden, they have could permits to park in Ace
 21 parking lot, if we can't find parking.

22 And I might have come back here 'cause I am
 23 losing time.

24 Residents complain about the noise and dust; I
 25 was thinking how we can resolve that.

6-4
cont.

6-5

6-6

1 I'm not -- I don't know about construction, but
 2 how about a noise-blocking acoustic wall? I was thinking
 3 La Brea and Wilshire, MTA Metro, they have a big wall
 4 like that.

5 So how about something like that on Wilshire?
 6 And then I was thinking sound-wave blankets, acoustic
 7 paneling?

8 So I would appreciate all that. And I think I'm
 9 gonna come back; I'm out of time. I'll come back. Thank
 10 you.

11 COMMUNITY MEMBER: Two other points.

12 One is safety of the students in the community.
 13 One is currently, it's not safe. They're being dropped
 14 off, picked up on another street. They are on McCadden,
 15 on the other side, north of Sixth Street. They are on
 16 June Street.

17 Running in the street on a regular basis. I
 18 don't mind them being in front of my house while on my
 19 grass, but it's a, number one, safety issue. And it's
 20 just a matter of time when one of them gets hit.

21 We have been warning the school over a decade.
 22 We have been warning about the public safety issue and
 23 have been ignored by the district for over ten years.

24 A child is gonna get hurt by building a school
 25 this size. That's the reason why the parents can't have

6-6
cont.

6-7

1 an easy drop-off; they go to other streets.

2 When a kid is hurt, it will be that CEQA didn't
3 really do its job.

4 Lastly, you're going to have a four-to-five year
5 construction project with students here? What a joke.
6 Talk about the safety.

7 Close the school for two years. Make it a
8 little bit smaller, knock it out, save some money.

9 The school will be reopened. There will be a
10 greater school. You won't have the risk of a student
11 being hurt.

12 There is going to be asbestos here. This is
13 fill property. We're over an underground river. There's
14 fill here; you have no idea what is really going to be
15 there.

16 It is just a matter of time. You're having kids
17 who are more susceptible to environmental health, who are
18 going to be bombarded with construction project building,
19 kicked up from the soil and dirt in the air.

20 Thank you for your time.

21 COMMUNITY MEMBER: I just have a question. What
22 is the plan for the traffic flow during the construction
23 years?

24 And also, how does the traffic flow being on the
25 other side and going on Wilshire, how does that remediate

6-7
cont.

6-8

6-9

1 the flow?

2 As a resident of Las Palmas and Sixth, I try to
3 pull out my driveway three o'clock in the afternoon, and
4 a truck parked right in my driveway. Same thing with
5 7:40 in the morning. Thank you.

6 GWEN GODEK: The project will be phased, so
7 construction will move around the site, which is why it
8 is going to be very long. And entrances and exits may
9 move at times.

10 We do a lot of coordination with the school to
11 make sure we're not getting deliveries during passing
12 periods; that we're not getting deliveries during
13 drop-off and pick-up periods. It's like a giant dance
14 that goes on for five years.

15 So we're continually -- it is mostly
16 coordination with the school and neighborhoods to make
17 sure that traffic can flow into the construction site and
18 out of the construction site without impacting or making
19 worse the existing traffic patterns.

20 I don't have a lot of detail yet, but we are
21 starting with the underground utilities and interior
22 housing, original existing buildings.

23 COMMUNITY MEMBER: But that's not an answer to
24 the traffic question.

25 GWEN GODEK: In terms of exactly when the trucks



6-9
cont.

1 will come in and go out?

2 COMMUNITY MEMBER: Exactly.

3 GWEN GODEK: That is going to change as we move
4 through the phases of the project.

5 COMMUNITY MEMBER: I'm wondering, are there
6 rules or ordinances of what types of trucks are allowed
7 to go on residential streets?

8 Because if the construction is starting at 7:00
9 a.m., I am picturing huge trucks and idling and waiting
10 on all of our residential streets.

11 GWEN GODEK: In general -- in general,
12 everything will come in off Wilshire. They are public
13 streets, and sometimes deliveries coming from far away.
14 So I can't say that they exactly will get here after
15 7:00.

16 In general, all deliveries should be coming
17 after 7:00. We can't -- I don't know we won't have
18 anyone coming in unloading before 7:00 a.m.

19 Does that answer your question?

20 COMMUNITY MEMBER: It does.

21 COMMUNITY MEMBER: Hi there, David Gerber; I'm a
22 neighbor from across the street. To Dr. Mandel's point,
23 and also to the idea of alternatives, how come there's
24 not alternatives to close the school for two years, get
25 it done it right, get it done quickly?



6-9
cont.

6-10

1 Rather than dragging it out for a
2 four-to-five-year period?

3 We all know how construction promises can
4 sometimes go. Not on the scheduled -- not stick to the
5 schedule that was conceived.

6 And it just seems like, to do this right, do it
7 well, it would be better to condense it, to have the
8 contractors more on schedule, more accountable to stick
9 to that schedule and try to get this done quickly.

10 Students could be disbursed to neighboring
11 middles schools. As Dr. Mandel says, they're already
12 coming from very many sites that are not really directly
13 in the neighborhood.

14 And that would just seem to be, at least, an
15 alternative worth considering. Thank you.

16 Are you going to answer it?

17 FACILITIES TEAM: Yeah. So I can state
18 generally that CEQA generally does not require, you know,
19 the analysis of every conceivable, you know, alternative.

20 Alternatives are generally developed based
21 around still achieving the project objectives which are
22 developed for the project. But I -- that's something
23 when we will definitely consider when we are preparing
24 the final EIR.

25 Sorry, I don't have all the answers tonight.

6-10
cont.

1 COMMUNITY MEMBER: One other question, as a
2 neighbor and looking ahead to four or five years of
3 construction work, which I assume will also include
4 weekend days, or, at least, Saturdays, I'm concerned
5 about not being able to sleep in for four or five years
6 on a Saturday morning.

7 What time will construction start on a Saturday
8 morning?

9 MS. GODEK: All right. When we award the
10 contract, the contractors are required to meet the sound
11 ordinance requirements in the city of Los Angeles, which
12 does allow for Saturday work.

13 In general, we don't work on Saturdays. I mean,
14 contractors don't want to work overtime any more than
15 anyone else does.

16 There will be times when we have work that
17 cannot take place when students are here. Whether that
18 is electrical circuits, the electrical sockets, there
19 will be times it has to happen after hours when students
20 are not here. Whether it is afternoons or evenings.

21 Before that, noise ordinances, or on Saturdays;
22 it's generally not loud work.

23 So, again, I don't have -- I can't say they're
24 going to work every Saturday. They're not going to work
25 every Saturday.

6-11

1 I can say the projects that I've worked on in
 2 the past, work the occasional Saturday. It's typically
 3 not a lot of work. But it's possible that a concrete
 4 pour on a Saturday and a lot of trucks coming in.

6-11
cont.

5 COMMUNITY MEMBER: One last question. During
 6 construction and going into the soil, what contaminants
 7 in particular with CEQA, or construction will you be
 8 looking for to see if there is a problem that would
 9 arise?

10 MR. PAEK: So actually, regarding soil testing
 11 found in the hazards or hazardous material section of the
 12 EIR -- it's all in the EIR.

6-12

13 There will be a significant clean-up activity
 14 that would be phased in as they are working on the
 15 buildings, so the EIR -- the preliminary environment
 16 assessments did find certain parts of the campus where
 17 they did find contamination.

18 And all of that will be cleaned as part of the
 19 project.

20 COMMUNITY MEMBER: Hi, I am Patty Longard. I
 21 live around the corner, and I am also a member of the
 22 news media, so I might get shunted to the -- but I wanted
 23 to just ask this question.

6-13

24 In an earlier presentation, a long time ago,
 25 there was a very extensive discussion of the garden and

1 the outdoor learning center, which would take place in
2 the courtyard area, the restoration in the historical
3 courtyard.

4 And I just wondered if that has been altered and
5 changed, reduced in size if it's there? And if it's
6 still as robust a program as was described?

7 MR. SINGLETARY: When we modified the design to
8 include keeping the shop building and then having two new
9 buildings in the quad, we really studied how the -- those
10 buildings would relate to the outdoor space.

11 The way we think we have done it, and the
12 architects and the landscape architects have worked to
13 make the outdoor spaces, the gardens, and the engagement
14 of the inside to the outside, a learning experience.

15 So where the music is now positioned, when you
16 come into landscaped area, it is now built around being
17 able to bring music out into an outdoor environment.

18 The same with the makerspace, which is like
19 robotics and engineering, you know, come out into that
20 engineering space.

21 And it really took, what was the -- that quad,
22 very expansive quad, where we had big gardens, you could
23 hang out in socially, we now have social spaces that we
24 think will really add to make it robust learning
25 environments as well.

6-13
cont.

1 So we are all very excited about it, the bridge
2 between, you know just landscaping and social activity.

6-13
cont.

3 So that's why we developed it; hopefully, it
4 will be successful. Thank you.

5 COMMUNITY MEMBER: One more time. The other
6 thing the way addressed in EIR that they totally
7 dismissed, and I really am passionate about this, so I am
8 sorry, but here it goes; I want it on record.

9 So there are over 2,000 students who finish
10 class. It's chaos when school lets out.

11 All of the students who are being picked up on
12 Wilshire onto the small street of South McCadden.

13 In addition to this, parents are sitting
14 bumper-to-bumper in the cars waiting for their kids.

6-14

15 There is always honking, and, at times, our
16 driveway is blocked. Some also jaywalk across the
17 street, which a very dangerous decision.

18 In addition to the 2,000 students filtering onto
19 our streets after school ends, the entrance at Sixth and
20 McCadden is blocked off with cones and the parking
21 enforcer.

22 It's before, during, and approximately 20
23 minutes after school lets out every day.

24 Even though the residents are given passes to
25 get home, it's still very stressful to get home.

1 I, and the other residents, realize that this is
2 probably the one and only chance to make the change.
3 This is over a \$100-million project that is supposed to
4 not only update the school, but to make it safer.

5 Changing the location of the car line onto JB'S
6 property where busses are, which doesn't seem that hard
7 to me, not only will make the lives of the residents
8 living on McCadden livable, but it will make it safe for
9 the students.

10 I want the architects to go back to the drawing
11 board and design the new proposed JB parking lot to
12 accommodate a car line that will enter and exit Wilshire
13 Boulevard.

14 If, for some reason, they can't do that, I would
15 like them to propose other ideas.

16 I just want to add that I, and so many others
17 have submitted those concerns and possible solutions to
18 the draft EIR report.

19 I am not only submitting my concerns to the EIR,
20 but also pictures of cars and busses forced to drive on
21 the wrong side of the street because of the car line.

22 There have been accidents and near misses.

23 Okay. When I -- when I read the answers to the
24 draft EIR, all my concerns were completely ignored. They
25 just said it's going to remain the same.

6-14
cont.

1 That was it. The draft EIR stated that the car
 2 line would remain on South McCadden. The only change
 3 would be the location of the busses. Okay.

↑
 6-14
 cont.

4 COMMUNITY MEMBER: I would like to repeat and
 5 say everything that she said is perfect. But I also want
 6 to know, where are the trucks going to be able to park?

7 Are they all going to be on Wilshire? Are you
 8 putting them -- you know, the actual construction trucks,
 9 are you putting them in your parking lot while you're
 10 doing that?

11 I just don't want the trucks in front of my
 12 house. And I don't want to hear them idling at 6:00 a.m.
 13 waiting to get to you after the kids get in school.

14 I just want to know, like, the times -- I don't
 15 what the times are that you're allowed to be doing
 16 construction. That hasn't actually been addressed in
 17 your report.

6-15

18 But what are the actual times when they're
 19 allowed to be doing construction? On the weekends and
 20 during the week? And where they are gonna park the
 21 trucks?

22 MS. GODEK: The noise ordinance in the city of
 23 Los Angeles is 7:00 a.m. to 9:00 p.m. Monday through
 24 Friday.

25 8:00 a.m. to 5:00 p.m. on Saturdays. And no

↓

1 work on Sundays. That is the allowable time you can do
2 construction -- noise-making construction activities in
3 the city of Los Angeles.

4 So we are still about two years away from
5 construction, and we haven't done the in-depth analysis
6 yet to determine exactly what the entrances and exits for
7 each phase are going to be.

8 That will happen. There will be a detailed
9 analysis. In terms of where they will park; again, we
10 have not done any kind of detailed analysis.

11 In general, we do write contractors saying, "You
12 may not park on adjacent streets and we usually we
13 outline, give them a map, "This is where you are not
14 allowed to park."

15 On most projects, we require them to park within
16 their construction fencing.

17 I know this site very tight. And we are looking
18 at other options. And I am not sure exactly what those
19 are going to be, whether it is parking somewhere, whether
20 that means carpool, I am not sure.

21 It is something that we are studying.

22 So there will be an answer as we get closer to
23 the construction. And we will have further community
24 meetings closer to construction once we have done those
25 studies.

6-15
cont.

1 COMMUNITY MEMBER: Good evening. My name is
2 Jose Depasa (phonetic.) I work with the Community
3 Relations Department.

4 There is a number of questions about what is
5 gonna happen when construction actually begins about two
6 years from today. Before that, all the different teams
7 involved in this project, initially the construction
8 part, get together analyze everything they need to do,
9 consider all the people who live around us, the
10 schedules, when there is going to be testing for the
11 students, the traffic, all these things are thought out
12 and discussed and planned and developed.

13 And we bring community relations, bring experts
14 to talk -- to present those plans to you and get your
15 comments a few weeks before construction actually starts.

16 They don't come and start construction and then
17 when a problem comes up, they try to figure out how to
18 solve it. They have to think about that before it
19 happens and have plans.

20 Because we know, we have learned, we have been
21 doing construction thing for 20 -- almost 20 years, as
22 beginning a new school that construction a very complex
23 thing.

24 Construction is on -- nobody comes out unscathed
25 in one way or another. It impacts everybody.

6-16

1 Our task, then, as a team is to minimize it to
2 the lowest possible level that we can.

3 And that deserves its own kind of meeting of
4 special notification we have with the community, with
5 parents, and with staff a few weeks or sometimes a month
6 or two before construction actually begins.

7 You see -- tonight is just for your just
8 comments back for the record, to be taken and recorded
9 and so forth.

10 You don't see a whole lot of engagement by the
11 construction staff itself, because we are not there yet.
12 We will bring that to you.

13 COMMUNITY MEMBER: I've got another question.
14 This one is a concern as a tax payer. I'm curious if
15 anyone can address how the budget went from 105,000,000
16 to 85 percent more approximately, to 198,000,000.

17 Does anyone have the answer to that?

18 MR. SINGLETARY: Sure. Couple things. The
19 original budget at the very beginning, I assume you
20 remember we were going to remove the girls' locker
21 building.

22 There is additional portable buildings that we
23 were contemplating keeping at the time. So there's a
24 handful of new classrooms, new locker building, which is
25 attributable to a portion of that. Certainly not all

6-16
cont.

6-17

1 that 8 percent, you know?

2 The other thing is that we have made a lot of
3 progress in the last couple of years. District's done
4 over million dollars of work.

5 And as most people probably have seen, the
6 construction market has climbed dramatically.

7 So we have reanalyzed our budget; we do have a
8 new scope that we presented the package with shifting the
9 designs, doing retrofit work.

10 And with the new scope, the changed scope and
11 what we now see in building with predictions for us to
12 delay even further into the future, this is our current
13 analysis and where we think the budget is at.

14 COMMUNITY MEMBER: How much cheaper would it be
15 if you did build over the course of two years and did
16 everything opposed to extending it to five years?

17 MR. SINGLETARY: I totally understand the
18 question of closing the school for two years doing all
19 that construction in a short time frame. And I can
20 promise you we have absolutely explored that on every one
21 of our jobs.

22 It's not as simple as moving 17-, 1,800 kids to
23 another campus or even spreading them around; it doesn't
24 work that way.

25 It's a very challenging concept that we continue

6-17
cont.

1 to explore; we do look for those opportunities. But
 2 taking John Burroughs Middle School and distributing them
 3 around the district, is not -- there's not enough
 4 bandwidth at any campus to take any of students out for a
 5 couple of years and bring them back. It's a big
 6 challenge.

6-17
cont.

7 But we have considered it. Thank you.

8 COMMUNITY MEMBER: Good evening. We're doing
 9 construction doing school time, are you going to inform
 10 all the parents that? Are you going to give letters with
 11 the five different languages?

12 Because you know a lot of parents don't speak
 13 English. Are you going to inform 1,700 family there is
 14 hazard in this area? Yes or no?

15 MR. SINGLETARY: Absolutely. Yes.

6-18

16 COMMUNITY MEMBER: And the kids are going to
 17 send -- and the parents are going to send the students to
 18 a school that is under construction? And they know there
 19 is hazard, right?

20 FACILITIES TEAM: Yes. We have a whole
 21 community relations department that will work with the
 22 parents --

23 COMMUNITY MEMBER: But there are not parents
 24 here tonight -- maybe there's a few. So you gonna send
 25 1,700 letters to parents; right?

1 FACILITIES TEAM: Yes.

2 COMMUNITY MEMBER: Okay. That's good.

3 DR. MARTINEZ: The safety of students and
 4 neighbors and parents and staff and everyone is the
 5 number-one consideration for any planning that the team
 6 will be doing for the reconstruction.

7 Not only at that initial pre-construction
 8 meeting, where we inform people about the plans and what
 9 is going to happen, we know most parents would not come
 10 to the meeting.

11 Most communities do not usually come to the
 12 meeting. So we take that information to them; we send it
 13 home with students. Middle school, a little bit. High
 14 school hardly ever because we know they don't like to
 15 take stuff home.

16 So we bring it directly to all the parents, all
 17 the guardians' homes. We walk door-to-door, especially
 18 the neighbors, because they are the most impacted in any
 19 construction.

20 So they know what's going to happen. But not
 21 only because of construction, we also do it every time
 22 during the phasing of projects, when there is some
 23 activity that may be unusually loud or louder than
 24 normal.

25 Or we -- we walk door-to-door and answer



6-18
cont.

1 questions, so that they at least know what's gonna
 2 happen, whether or not it is going to happen, and when it
 3 is going to happen. Thank you.

4 GWEN GODEK: LAUSD has rigorous safety
 5 standards. I cant think of anyone who has safety
 6 standards more rigorous than us in terms of how of how we
 7 do construction.

8 We look at every piece of material we are taking
 9 out and every piece of material we're bringing in.

10 We look at all of the dirt that goes out and we
 11 look at all of the dirt that comes in.

12 We have a process in place in terms of how we
 13 remove things. If we find that underneath an old wall 80
 14 years ago they used a material that we no longer consider
 15 safe, it is put in containment. We follow all the best
 16 practices of the industry.

17 So when we are done, you're going to have a
 18 school that is safer than what we have now in terms of
 19 materials, in terms of how it works.

20 While we are doing construction we are very,
 21 very careful in how we do it.

22 COMMUNITY MEMBER: So are you going to go to the
 23 parents and tell them the same thing that you tell us?

24 FACILITIES TEAM: We communicate with them, yes.

25 COMMUNITY MEMBER: I mean, are you going to meet

6-18
 cont.

1 together with them? Is 1,700 family going together and
 2 ask the same questions?

3 FACILITIES TEAM: We will invite them. Whether
 4 you know what they show up or not --

5 (Unintelligible; multiple voices speaking.)

6 FACILITIES TEAM: I'm the construction person.
 7 They're the outreach.

8 COMMUNITY MEMBER: Another question.

9 I have working 25 years in construction as a
 10 California citizen. I am driving on Freeway 110 and I
 11 see empty school. Over there is still empty. I think it
 12 was a 20,000,000 school. Still empty. I am afraid that
 13 will happen here.

14 You know exactly what I am talking about.

15 Another question that I have, last time I asked
 16 the gentleman, what are you thinking? How much money --
 17 how much is your budget? And then I asked you the second
 18 question, how many square foot are you going to build, or
 19 what foot and when? You didn't know.

20 And I am general contractor. And I know, first
 21 thing you need to know is square foot and then the money.

22 How do you know the money before the square
 23 foot? What is going on here? Please answer.

24 DR. MARTINEZ: Tonight, as I understand it, is
 25 to take all your comments, not necessarily to engage in a

6-18
cont.

6-19

1 back-and-forth.

2 Your comments are absolutely valid; they are
 3 real and we are here. And that is why we are taking your
 4 comments and there is not a lot of back-and-forth here.

5 We take comments from the parents very
 6 seriously.

7 I told you yes, we do invite the parents; we do
 8 send the notices, not only for the meetings, but any time
 9 there is any impact to the parents. We can only invite
 10 them.

11 A lot of parents, we understand, have busy
 12 lives, have work, many have lives, have things to do.

13 We cannot demand that they come to our meetings
 14 every time we call them.

15 We made sure that they may not always come. We
 16 send the information to them.

17 That is the best we can do. And it has worked
 18 well, because people, any of our constituencies, always
 19 say if they disagree with something. But, our task is to
 20 make sure they don't say, "You didn't tell us about
 21 anything."

22 That's what's important. Thank you.

23 COMMUNITY MEMBER: I was just wondering how many
 24 now, students do we have right now?

25 DR. MARTINEZ: 1,700.



6-19
cont.

1 COMMUNITY MEMBER: And after, the way you have
2 right now, how many students will it accommodate?

3 MR. PAEK: There will be no change to the
4 capacity of the school.

5 COMMUNITY MEMBER: Really?

6 MR. PAEK: Correct.

7 COMMUNITY MEMBER: But those three-story
8 buildings?

9 MR. PAEK: Correct. Because, remember, they are
10 removing all of portable buildings that are currently
11 being used as classrooms. So with the removal that is
12 the net.

13 COMMUNITY MEMBER: Now, in the case of building
14 while the students are going to school, I -- I -- I; can
15 visualize it already. This is a very litigious society;
16 we have here in California, especially, and everybody's
17 suing the Board of Education where the children have a
18 little asthma or something. They were breathing things
19 that are not healthy.

20 And I have got a solution; that's what I would
21 do; I am very logical. Instead of doing all the messy
22 construction, with all the neighbors getting upset and
23 all the lawsuits I know you are going to get, why can you
24 just not have summer school, and just this during the
25 summer just do full-time construction when you don't have

↑
6-19
cont.
↓
6-20
↓

1 children or anything?

2 You do what you do at full speed. That will
3 probably take you through one or two summers. And you
4 would get the same thing and no lawsuit.

5 And maybe the neighbors -- I feel very, very bad
6 for the neighbors on McCadden; I was thinking about that,
7 because they have a hard time. I have a hard time, too,
8 but not like them. So that is my consensus.

9 But what do you think about summer construction?
10 That is three months.

11 FACILITIES TEAM: So building a building, even
12 with an ambitious schedule, generally takes at least 15
13 to 18 months. After we have moved what is there and
14 cleared the site and done all of our abasement
15 demolition, it's not something that we can do during our
16 summer period.

17 COMMUNITY MEMBER: Well, I mean, you could do
18 part of it. Something.

19 FACILITIES TEAM: It takes really about 15 to 18
20 months of continuous construction.

21 COMMUNITY MEMBER: My name is Henry. I live in
22 the 61 South June. And my point of view is, I think the
23 school is supposed to be downsized or even closed.

24 Here's my reason.

25 Number one is safety. Every morning when the



6-20
cont.

6-21

1 parents drop off the kids and afternoon when they pick up
 2 the kids because it's hard for the parents found parking.
 3 Some of the parents, they just stop right in the middle
 4 of the road. It happens all the time; the parents block
 5 the intersection.

6 One more thing, nobody mentioned that. In our
 7 backyards, constantly kids, I'm talking about, they throw
 8 the food back over, footballs, basketballs. Sometimes
 9 even rocks. So that just dangerous. We have kids, too,
 10 in our backyard playing. Right?

11 I don't know exactly who, I assuming it's kids.
 12 They throw food, things, footballs, basketballs, trash.
 13 Sometimes even rocks, big. One I got is, like, big.
 14 It's really, really dangerous.

15 Number one safety, our kids, for our kids, too.

16 COMMUNITY MEMBER: I have been to a couple of
 17 the meetings. What I think I am hearing from all the
 18 neighbors in the community is we all love having the kids
 19 here. And it is nice having the school here in our
 20 neighborhood. It does feel very friendly and warm.

21 Now, I will say this, my children went to the
 22 Center for Early Education; I have nephews there now.

23 They just underwent a huge construction project
 24 where the budget was through the roof. And I can tell
 25 you firsthand that the kids were all exposed to dust and

6-21
cont.

6-22

1 chemicals and exhaust from all of the equipment.

2 And there were parents that pulled their kids
3 out because the HVAC intake was actually emitting the
4 fumes into the kindergarten classes where the kids were
5 smelling gasoline.

6 So I am just going on record as saying it sounds
7 so lovely to say you're going to do that, you are going
8 to do everything with the highest of standards for the
9 kids and for the community.

10 I think it's near impossible to tell all of
11 these parents that their kids are not going to be
12 inhaling fumes and toxic substances that we don't even
13 know what they are.

14 And so one of my questions to you is, who is
15 doing the remediation of the hazardous materials? Is it
16 a third party?

17 I am also noticing the flyer that's offering,
18 outreach to kids 18 years and older being part of the
19 construction crew.

20 Are there experts that are going to be doing the
21 remediating?

22 MR. PAEK: I can answer that.

23 The district does have its own facility,
24 Environmental & Technical Unit, FETU, which is a team of
25 experts that oversees abatement remediation process.

6-22
cont.

1 They usually consult with, you know, a
 2 contractor that specializes in abatement, you know, for
 3 asbestos or whatever, contaminants, for that particular
 4 project.

5 So that we do have a team of experts that --
 6 'cause this happens at a lot of our schools. A lot of
 7 our schools are older. And do have those contaminants
 8 like asbestos.

9 MS. GODEK: They have to be prequalified. And
 10 we only work with a few prequalified subs.

11 We do have the facilities; they're our major
 12 expert. They do oversee the whole process. We will have
 13 an abatement expert, who is also assigned to the project.

14 They also will have a third-party monitor. The
 15 third-party monitor will be here to observe full time as
 16 any abatement takes place.

17 COMMUNITY MEMBER: I have 20 seconds left and
 18 I -- sorry, thank you.

19 The second part of my question was if there is a
 20 level of polluting or something in the classroom, that
 21 the parents are not already are of, or the kids don't
 22 even realize just what happened at the other school, what
 23 is your plan?

24 GWEN GODEK: I can't see that happening. That
 25 is not to say that it could not happen; we do monitor

6-22
cont.

6-23

1 full-time. If there is abatement, we test the air before
 2 they go in. We observe all of it taking place. We test
 3 the air before they come out. Before we take down that
 4 containment in the air.

6-23
cont.

5 COMMUNITY MEMBER: Okay. Thank you.

6 COMMUNITY MEMBER: The reason number two is the
 7 school is not supposed to be modernized.

8 We all know the school located Hancock Park, we
 9 all know most of the houses under (Inaudible). Right?
 10 Even though we want to remodel our house, we have to get
 11 permit; right? We have to go under the HP.

12 But this school gonna be modernized; it won't
 13 just belong to the community.

6-24

14 And also, how many kids in this community are
 15 going to this school, right? You're talking about
 16 students come from 64 zip codes. Right? So talking
 17 about money, as Angelinos, we have a better education for
 18 kids; right? We need to spend money wisely. Elsewhere,
 19 not here.

20 Because here you can see how many people are
 21 against it, right? They all cost money, we have fought
 22 the process for over five years; right?

23 I heard you. Right? All of this, like this
 24 meeting, they all cost money. With this money, we can
 25 build elsewhere, not here. Right? So spend money

1 wisely. Not here.

2 Even though you spend the money, how much
3 potential you have in this school? Traffic, you're
4 building a modernized school in the center.

5 The traffic only getting worse. I remember you
6 gonna open a new entrance at Wilshire; right?

6-24
cont.

7 That gonna make gridlock block on the
8 intersection of June and Wilshire even worse. Like now,
9 we are not able to get -- not even able to get out June
10 Street in the morning during the pick-up, drop-off and
11 pick-up time.

12 COMMUNITY MEMBER: Really fast, what about
13 neighbors like me that don't want to take a chance with
14 these toxins and stuff? I don't want to really risk a
15 chance on my kid's health. So what about that?

6-25

16 My child -- one of my children has autism,
17 very -- noise is a big thing for my son who has autism.

18 So five years with all this construction noise,
19 I want to know how you are going to deal with that?

6-26

20 Just, I don't want to give wrong information,
21 and I probably shouldn't say this, because if I am
22 wrong -- so I just want to put a disclaimer, but I was
23 talking to my aunt who lives in Beverly Hills.

24 And I thought she was telling me that they did
25 some sort of reconstruction on one of the schools, they

1 relocated the school. Again, I don't want to say -- I
 2 could be wrong, but I remember she said that. So it is
 3 possible.

↑
 6-26
 cont.

4 Another thing is, I recommended they put an app.
 5 If you want to put the word out. I'm sort of surprised;
 6 I thought here would be a lot more people interested in
 7 it.

6-27

8 And so if you really want to get the word out,
 9 try a neighborhood app.

10 And what else? I'm very worried about, like I
 11 said, the substantial -- oh, yeah, you said that the
 12 only -- I'm sorry if I am not saying right word, the
 13 substantial impact, it was noise and I know I'm not
 14 saying the right word.

6-28

15 But you didn't mention the toxins and stuff,
 16 which was weird to me. You said the only thing that had
 17 substantial impact was noise, which I think was odd.

18 I never mentioned the design. I don't like the
 19 design; it's weird to me. You have a building, 1924,
 20 administration building, which is very almost 100 years
 21 old. Then you make it a modern building?

6-29

22 It's called a modernization project, and it just
 23 doesn't flow to me.

24 This is only time I ever see design -- can I
 25 just finish?

↓

1 But this makes it very modern and weird, and I
 2 am thinking that it needs like a older look, like a flat
 3 paint, maybe brown, to make it more nice and not so
 4 weird. One side looks modern and the other side looks
 5 like a 1924 building.

6-29
 cont.

6 So we need to go back the drawing board in my
 7 opinion. Thank you.

8 COMMUNITY MEMBER: I would like to take this
 9 opportunity for the neighborhood to hear me.

10 I think honestly, it's very hard for me to say,
 11 I think it's waste of time. The city will win anyway;
 12 they will do whatever they want. I used to work for the
 13 city 25 years ago.

14 They have the budget to change it and I came and
 15 say for ten percent of this I can send it and finish it
 16 and make it much nicer than a new one.

6-30

17 The city came and said, no, we have budget, take
 18 it out. 100,000. So I know what is -- the city is
 19 without a budget.

20 I think we should challenge the city, not here.
 21 We should all put money. Take it, get good lawyer. And
 22 challenge them in the court. Otherwise, it's waste of
 23 time for all of us, for everyone. This is my opinion.
 24 Good luck for everybody, Good night. Thank you.

25 COMMUNITY MEMBER: I still advocate for closing

6-31

1 the school for two years and two summers. It's two
2 school years only. Start it in May or June, go through.
3 The other schools have done it.

4 Demographically you know what the numbers are
5 middle school students in LAUSD. You can predict it's
6 going down; you know what the numbers are gonna be. You
7 knock out the school in two school years. You close it.

8 Opens up. You won't have the issues of
9 environmental of -- environmental issues on kids. Much
10 safer for the kids. It's better and safe. You won't
11 drag it over four or five years.

12 You know what the expectations of steel and
13 concrete are; they're going to go up. You have no idea
14 what eight years from now or nine years, steel prices are
15 gonna be. Just like the train to nowhere.

16 The budget is not the budget. You have already
17 blown your budget; you are 191-. You end up having a
18 budget of \$250- or 300,000,000? And you come back and
19 see the number of kids really impacted?

20 What, are you going to come back to the taxpayer
21 and throw more money at the schools?

22 You are wasting money. Do it efficiently, close
23 the school.

24 Now is the time. You have a demographic window.
25 Bancroft's not full. Look, (Inaudible) is not

6-31
cont.

1 full. RFK is not full. Three middle schools that are
 2 not full and you are building another one on Fairfax and
 3 Wilshire. A new kind of magnet building being built by
 4 LAUSD for 385 kids.

6-31
 cont.

5 Now is the time to do it. Close the school two
 6 years, two years, two summers. You will save money, you
 7 won't have the safety issues. Thank you.

8 COMMUNITY MEMBER: I'm not even sure you could
 9 come up with a budget, whether it be 105, when you
 10 haven't even bid this out.

11 I mean, I don't know if you go to contractors
 12 and tell them, this is what we have, bid on it.

13 Actually asking them for competitive bidding.

14 Can anyone explain how this process works in
 15 term's of the soliciting bids? How can you put together
 16 budget without that process?

6-32

17 MR. SINGLETARY: Sure. We use cost estimators
 18 before we go out to bid. So there are professional cost
 19 estimators in the district.

20 And we also, through our architect contracts,
 21 they have cost estimators. So we see the trends in the
 22 marketplace and what the project is costing. And so
 23 that's estimating.

24 Once we out go to bid, there is a public
 25 contract code the district sort of follows. And so we

1 will see the realized price, you know, once we go out to
2 bid. We do our best to predict using estimation.

3 COMMUNITY MEMBER: And in recent history, those
4 initial projections, how accurate have they been?

5 MR. SINGLETARY: The initial projections, from
6 when we came out, there was a series of projects the
7 first of eleven, we have seen increase on those first
8 eleven.

9 We have some other projects that we scoped and
10 estimated later than those projects, that actually we
11 have seen more accuracy. Because we have realized the
12 construction market and where it trended, from the
13 downtrend to now. So we are able to catch up with our
14 estimating.

15 COMMUNITY MEMBER: So do you anticipate the 190-
16 sticking? Or how much more you anticipate, or what do
17 you have put aside as a contingency for an increase?

18 MR. SINGLETARY: So we definitely have, at this
19 point though, much more profit, half I would say.

20 We have now started to really see some bids come
21 in on projects similar to this. And really it's about
22 precedence and seeing that precedent and the challenge of
23 construction on active school sites on a project of this
24 scale.

25 Now that we have some of that information in our

6-32
cont.

1 pocket, I think we're doing -- getting a lot closer to
 2 where things are at.

3 As Dr. Mandel pointed out, nobody knows where
 4 steel prices will be a number of years from now. Our
 5 estimators do the best they can.

6 COMMUNITY MEMBER: Thank you.

7 COMMUNITY MEMBER: In two or three years, the
 8 kids are gonna be gone.

9 The people that you have to notify are the
 10 parents that are considering coming here from the 64
 11 different zip codes.

12 You have to notify the people who are thinking
 13 of coming here for a magnet school, that has, because of
 14 the excellent principal and teachers has won awards.

15 But people don't want to send their kids to a
 16 school that is in the middle of a construction site.

17 You have to notify all kids. The parents of the
 18 kids who are considering going to a magnet from the 64
 19 different zip codes.

20 You have to notify the kids who are in
 21 kindergarten to fourth grade, so that they know before
 22 they fill out the form to maybe come here.

23 Because you are going to find a lot less kids
 24 wanting to come here; their parents don't want them to be
 25 standing around and getting disturbed and having no place

6-32
 cont.

6-33

1 to do physical education. What are you going to have
 2 them do, run around Las Palmas?

↑
 6-33
 cont.

3 COMMUNITY MEMBER: I just had a question, just
 4 curious, about how much do you estimate to cost to go
 5 from this to starting? How much money?

6 MR. SINGLETARY: You know, I don't really know
 7 the answer to that question right off the top of my head.

6-34

8 Usually the design process, the front-end
 9 process, will be 10 to 20 percent of the overall project.
 10 Once the construction of the lion's share is known, but I
 11 don't have the exact number.

12 MS. AKINS: I just want to thank you for coming
 13 this evening, but I'm going to give you the next steps.

14 OEHS will compile the final EIR document with
 15 responses to your comments.

16 Next, LA Unified will be going to the Board of
 17 Education to see if this CEQA document gets certified or
 18 not. And the board members will vote on this project.

19 That will be the next step.

20 Before we do any construction, we will have many
 21 meetings and notifications so we can discuss details of
 22 phasing and answer any questions you may have.

23 About dust or trucks, parking, exits, et cetera.

24 If you want to speak one-on-one with the project
 25 professionals that presented this evening, or were

1 answering questions this evening, they will be up here
2 for a couple minute to speak with you one-on-one.

3 A lot of you didn't put your email address on
4 the sign-in. So if you would -- and you want to be
5 invited to meetings, would you do that?

6 I really appreciate that.

7 That is about it. I want to thank you all for
8 coming.

9 (Presentation concluded at 7:52 P.M.)

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REPORTER'S CERTIFICATE

I, Carrie D. Nahmias, CSR No. 11816, a Certified Shorthand Reporter within and for the State of California, do hereby certify:

That prior to being examined, the witness named in the foregoing deposition solemnly stated that the testimony given in this deposition would be the truth, the whole truth, and nothing but the truth;

That said deposition was taken before me at the time and place set forth and was taken down by me in shorthand and thereafter reduced to computerized transcription under my direction and supervision, and I hereby certify the foregoing deposition is a full, true, and correct transcript of my shorthand notes so taken;

I further certify that I am neither counsel for, nor related to, any party to said action, nor in any way interested in the outcome thereof.

Dated this 2nd day of January 2020, at La Habra, California.

Carrie D. Nahmias

Carrie D. Nahmias, CSR No. 11816

Comment No. 6-1

This comment has three parts one regarding whether transportation and traffic impacts were analyzed for both construction and operation, one on demolition regarding the proposed Project alternatives, and one in regards to safety concern of the location of the stairs.

Response to Comment No. 6-1

As responded to by Mr. Singletary during the public meeting on November 21, 2019, the proposed Project addressed transportation and traffic issues in the Draft EIR for both construction and operation of the project. Further, the Project would not result in an increase in enrollment.

Additionally, as discussed on page 3.7-6 of the Draft EIR, LAUSD SC-T-4 requires that contractors submit a construction worksite traffic control plan to LADOT for review prior to construction. The traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods, and provision of flaggers to assist or direct traffic flows to and from the local streets.

Mr. Peak provided clarification regarding the proposed Project description and the Project alternatives. It was stated that the proposed Project does involve demolition in the cafeteria and the classroom building, both of which are analyzed in the Draft EIR.

As responded to by Mr. Singletary, the stairs would be covered from above and therefore would shield the stairways from rain.

Comment No. 6-2

This comment is in regards to the impacts an increase in student population would have on traffic and air quality as well as the change of the existing baseball diamond to a soccer field. The commenter states that having 1,800 students on the campus is not needed and if the school was being constructed for 1,400 or 1,600 students, they would need less buildings and impacts would be decreased.

Response to Comment No. 6-2

The commenter states that the Project is being built for 1,800 kids and that that capacity is not needed due to the decreasing population of middle school students in the District. The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population and thus, decreasing the capacity of the school to accommodate 1,400-1,600 students as the commenter suggests, could require that students be reassigned to other middle schools in the district.

The commenter states that the community funded the construction and maintenance of the current baseball diamond. With the Project, Burroughs MS would be in compliance with California Department of Education requirements for field areas based on the planned student enrollment.

Comment No. 6-3

This comment has two parts; one is in regards to the impacts an increase in student population would have on traffic and the second is on the aesthetics of the sound wall and the height of the proposed Project buildings.

Response to Comment No. 6-3

As responded to by the Facilities Team during the public meeting on November 21, 2019, the sound wall has been added to screen noise and activity in the playground from neighbors.

As described in Section 3.1, Aesthetics on pages 3.1-8 and 3.1-9 of the Draft EIR and exhibited in figure 3.1-1 of the Draft EIR, the new Building B would occupy the space of the current Cafeteria-Classroom Building (Building 20) along South McCadden Place and would be situated north of the new Lunch Shelter and playing fields. The view of the existing Cafeteria-Classroom Building from the public right-of-way consists of a red-brick planter and red-brick building with windows. The exterior skin of new Building B would include brick masonry at the ground floor level as a “base course” to create a horizontal emphasis that is reinforced by the belt courses also used in the contributing buildings on the Campus. The patterning of the brick would allude to traditional brick assembly techniques, but would be composed to create visual changes at various scales through glazed unit accents which would be animated by the changing colors and reflections cast throughout the day. The upper stories of Building B would be distinct and complimentary to the brick base. The upper stories would be clad with glazed ceramic tile or a high-pressure laminate sheet panel cladding in a light stone-like color to compliment the heavy masonry. The ceramic tile would have a variegated glaze finish which would reflect light differently throughout the day. The exterior window design and fenestration¹⁵ patterning for Building B would have similar overall proportions, regularized spacing along the length of the façade and vertically stacked between floors. The view from the right-of-way would show proportional massing, design, and material finish that would resonate with the existing historical brick masonry buildings.

Comment No. 6-4

This commenter expressed concerns for issues previously mentioned that were not addressed in the Draft EIR such as the noise impacts, rat infestation, parking, and location of the carline.

Response to Comment No. 6-4

The commenter raises concern about the noise associated with the Project. A thorough construction noise analysis was conducted based on potential construction equipment and overlapping construction activities, beginning on page 3.6-21 of the Draft EIR. As discussed on page 3.6-23, LAUSD implements Standard Conditions SC-N-8 and SC-N-9 that require site-specific noise control measures be implemented during construction. Measures include exhaust mufflers, proper maintenance of construction equipment, and the use of noise barriers, providing a total noise reduction of 23 dBA. LAUSD is committed to implementing all effective and feasible noise reduction measures to ensure

¹⁵ Fenestration refers to the arrangement of windows and doors on the elevations of a building.

that temporary increases in ambient noise are limited. However, as discussed in Section 3.6, due to the close proximity of noise-sensitive uses to the east (adjacent residential uses), construction noise will remain significant and unavoidable even after implementation of feasible mitigation.

Regarding the commenter's concern for rat infestation, any rodents or pests that are observed on-site would be reported to the District's Integrated Pest Management (IPM) Program. The District is committed to providing a school environment that is free of pests, such as ants, cockroaches, and rodents in order to maintain the health and safety of students, staff, parents and the community. The Board of Education adopted the IPM Policy for use district-wide in March, 1999. The IPM policy provides guidance and direction in managing pests, while minimizing the use of pesticides, with the ultimate goal of not using any pesticides. Additionally, LAUSD released a Pest Management Quick Remedy Guide for Site Administrators on February 1, 2009 along with a policy to provide site administrators quick reference guidelines for preventing/resolving pest issues at schools and offices.

In regards to parking, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.¹⁶

In regards to the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, as stated on page 3.7-7 of the Draft EIR, the two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as taking the school buses off McCadden Place will improve traffic flow. Additionally, as stated on page 3.7-5 and 3.7-11 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction.

Comment No. 6-5

This commenter expressed neighborhood concerns towards construction parking and where it would be located as well as the neighbors having parking permits to park in the parking lot.

Response to Comment No. 6-5

As discussed on page 3.7-6 of the Draft EIR, LAUSD SC-T-4 requires that contractors submit a construction worksite traffic control plan to LADOT for review prior to construction. The traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods, and provision of flaggers to assist or direct traffic flows to and from the local streets.

¹⁶ LAUSD, 2019. Facilities Services Division, School Design Guide, <https://www.laschools.org/new-site/asset-management/school-design-guide>. Accessed May 8, 2020.

In addition, it is not anticipated that construction related vehicles will impact street parking. Per LAUSDs contractual requirements, all construction related vehicles, would avoid or limit impacts to available street parking, where feasible. Preferential parking districts are designated by the City Council. In order to request a preferential parking district, please contact your local City Council office.

Comment No. 6-6

This comment has two parts; one is regarding noise impacts and having a sound wall, sound blankets, and acoustic paneling, and the second is concern for dust during construction.

Response to Comment No. 6-6

The commenter suggests a noise-blocking acoustic wall similar to that along La Brea be constructed along Wilshire. As discussed on page 3.6-23, a 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA. A noise barrier of this type would be installed along the Project perimeter to ensure that construction noise is reduced, as required by LAUSD Standard Conditions. The noise barrier will not be permanent, and will only be installed for the duration of construction activities. As discussed in the Draft EIR, enrollment will not be increased, the number of cars dropping off and picking up students will not increase, and the level of activity on the campus would remain similar to existing conditions. Therefore, no noise-reduction is required during operations.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 6-7

This comment is in regard to student safety while walking to school and during drop-off and pick-up. The commenter also suggests the length of construction being cut to two years as closing the school during construction.

Response to Comment No. 6-7

As stated on page 3.7-7 of the Draft EIR, the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as taking the school buses off McCadden Place will improve traffic flow. As stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all

LAUSD modernization projects.¹⁷ Additionally, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction. The traffic control plan would include, but not be limited to, restricting construction-related trucks to off-peak commute periods and within specific time limits when students are not in the path of travel, and provision of flaggers to assist or direct traffic flows to and from the local streets. This would be continuously and actively monitored by the District. Further, as described in Chapter 2, *Project Description* of the Draft EIR, as Burroughs MS is an active campus, construction of the new buildings and modernization must be phased in a way to maintain the academic functions. To complete the comprehensive campus-wide modernization while school is in session, the construction process must be broken down into several phases so that the school can continue safely operating. Because of active school operation, less than five acres (contiguous) on Campus would be disturbed at any one time. An average of 50 workers would be onsite when students are present and a maximum of 150 workers would be onsite during peak periods (i.e., during summer break).

The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population and thus, closing the entire school for two years, as the commenter suggests, would require that students be reassigned to other middle schools in the district. This alternative is not feasible as there are no campuses that could accommodate such a large influx of students, if we were to close the school.

Comment No. 6-8

This comment is in regards to asbestos and air quality impacts to the health of students.

Response to Comment No. 6-8

As discussed on page 3.5-25 of the Draft EIR, the handling of asbestos-containing materials is heavily regulated by the federal Clean Air Act and the South Coast Air Quality Management District (SCAQMD), and OSHA. The Asbestos-Containing Materials in Schools rule (Code of Federal Regulations [CFR] Title 40, Part 763) requires local education agencies to inspect their school buildings for asbestos-containing building materials, prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. Compliance with asbestos regulations and requirements is the responsibility of the District's Facilities Environmental Technical Unit (FETU).¹⁸ The Project would be reviewed for presence of potential ACM prior to Project initiation, and materials that are suspected of containing asbestos would be tested. All ACM will be removed by licensed asbestos abatement contractors or by trained and certified FETU personnel using specific handling

¹⁷ Ibid.

¹⁸ LAUSD. Facilities Services Division, Facilities Environmental Technical Unit (FETU). <https://www.laschools.org/new-site/maintenance-services/fetu>. Accessed February 2020.

procedures. In addition, construction contractors are required to comply with the requirements of the District's Standard Specification Section 13280, "Asbestos Abatement and Asbestos Related Disturbance" during any project where ACM may be disturbed. Compliance with federal and State regulations and the District guidelines and procedures would ensure the reduced risk of release of asbestos into the environment.

Comment No. 6-9

This comment is in regards to traffic flow during construction and the traffic impacts due to the construction of the new driveways off of Wilshire Boulevard.

Response to Comment No. 6-9

As responded to by Gwen Godek during the public meeting on November 21, 2019, the proposed Project would be phased, and therefore location of entrances and exits during construction would be subject to change, all of which would be coordinated with the school and neighborhoods. Additionally, construction would not begin before 7 a.m.

The proposed Project would be implemented at an existing school site, would not directly or indirectly alter the configuration of the existing street system (including crosswalks or traffic control devices at intersections), would generate construction traffic that is generally compatible with the mix of vehicle types (autos and trucks) currently using the regional and local roadways surrounding the campus, and the proposed new and relocated driveways would include the use of standard engineering practices, such as standard driveway widths and turning radii and the provision of adequate line of sight to avoid design elements that could result in hazards. Impacts would be less than significant. As stated on page 3.7-5 and 3.7-11 of the Draft EIR, the Project would be required to comply with SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction.

Comment No. 6-10

This comment is in regards to the alternatives. The commenter suggests an alternative to the Project to close the school for 2 years to expedite construction.

Response to Comment No. 6-10

As responded to by the Facilities Team during the public meeting on November 21, 2019, CEQA does not generally require every alternative to be analyzed in the Draft EIR. Alternatives are based around achieving project objectives developed for the proposed Project.

Additionally, the purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population and thus, closing the entire school for two years, as the commenter suggests, would require that students be reassigned to other

middle schools in the district. This alternative is not feasible as there are no campuses that could accommodate such a large influx of students, if LAUSD were to close Burroughs MS during construction.

Comment No. 6-11

The comment is in regards to schedule of construction during the five-year construction period.

Response to Comment No. 6-11

As responded to by Ms. Godek during the public meeting on November 21, 2019, the proposed Project construction would be required to meet noise ordinance requirements of the City of Los Angeles, which is 7 a.m. to 9 p.m. Monday through Friday and 8 a.m. to 5 p.m. on Saturdays. Section 3.6, Noise of the Draft EIR provides an analysis of construction noise impacts.

Comment No. 6-12

The comment is in regards to soil contaminants and potential impacts during construction.

Response to Comment No. 6-12

As responded to by Mr. Paek during the public meeting on November 21, 2019, as detailed in the Draft EIR, the proposed Project would be required to clean up contaminants prior to construction. Site cleanup is detailed in the *Final Draft Removal Action Workplan (RAW)* (Appendix H of the Draft EIR), prepared by Leighton Consulting, Inc. As summarized in Section 3.5 of the Draft EIR (pages 3.5-19 and 3.5-20), contaminants of concern (COC) that have been identified within the impacted soil include arsenic and lead. In order to minimize and/or eliminate dust during excavation and soil removal, suppressant foam, water spray, and other forms of vapor and dust control may be required. Confirmation soil sampling and analysis would be conducted to verify soil impact contamination at the excavation bottom and sidewalls.

Regulations establish specific guidelines regarding risk planning and accident prevention, protection from exposure to specific chemicals, and the proper storage of hazardous materials. All RAW contractors and subcontractors would be responsible for operating in accordance with the most current requirements of Title 8, CCR (i.e., General Industry and Construction Safety Orders) ([Section 5129]), Title 29 of the Code of Federal Regulations (i.e., Standards for Hazardous Waste Operations and Emergency Response [Section 1910.120] and Construction Industry Standards [Section 1926]), SCAQMD Rules 403 and 1466 (dust control and air monitoring, see Section 3.2 Air Quality), and other applicable federal, State and local laws and regulations. All personnel would operate in compliance with all California OSHA requirements.

The Project would be in compliance with all applicable federal, state, and local requirements concerning the use, storage, transport and management of hazardous materials. Construction in conformance with standard regulatory compliance measures is adequate to reduce the potential risk hazards associated with construction activities.

Comment No. 6-13

The comment is in regards to the garden and outdoor learning center as well as the restoration in the historical courtyard.

Response to Comment No. 6-13

As responded to by Mr. Singletary during the public meeting on November 21, 2019, the proposed Project includes a modified design and details how the new buildings would relate to the outdoor space.

As described in Chapter 3.1, Aesthetics, pages 3.1-8 and 3.1-9 of the Draft EIR, the proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. For example, the Project design team included a qualified historic architect who provided input on the design throughout the planning process. The Project objectives and designs have been extensively reviewed by the design team to provide a design that was sensitive to the historic nature of the campus and that met the current and future academic, programmatic, and operational needs of the students and campus. The new buildings have been designed to be compatible with Burroughs MS in terms of scale, materials, and landscaping.

Comment No. 6-14

The comment is in regards to concerns of the proposed Project carline on South McCadden Place.

Response to Comment No. 6-14

With regard to the commenters concern for the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, as stated on page 3.7-7 of the Draft EIR, the two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as taking the school buses off McCadden Place will improve traffic flow. Additionally, as stated on page 3.7-5 and 3.7-11 of the Draft EIR, the Project would be required to comply with Standard Condition SC-T-4, which requires its contractors to submit a construction worksite traffic control plan (including strategies to safely accommodate students walking from local neighborhoods) prior to construction.

Comment No. 6-15

The commenter is concerned where construction workers would park during construction of the proposed Project and when/what times construction would occur.

Response to Comment No. 6-15

As responded to by Ms. Godek during the public meeting on November 21, 2019, the proposed Project construction would be required to meet noise ordinance requirements of the City of Los Angeles, which is 7 a.m. to 9 p.m. Monday through Friday and 8 a.m. to 5 p.m. on Saturdays. The location of construction parking is still being analyzed. Ms. Godek encourages the commenter to attend future community meetings closer to construction to get updated on those studies.

As previously stated, it is not anticipated that construction related vehicles will impact street parking. LAUSD provides contractual requirements for Contractors on all projects. For this project all construction related vehicles, including workers' private vehicles, would be required to park in areas that avoid or limit disruptions to the existing street parking, to the extent feasible.

Additionally, as stated on page 3.7-5 of the Draft EIR, the Project would be required to comply with SC-T-2, which states that vehicular access and parking shall comply with Vehicular Access and Parking guidelines of the School Design Guide. One of the elements of the School Design Guide deals with vehicular access and pedestrian safety. Conformance with the School Design Guide is a regulatory requirement for all LAUSD modernization projects.¹⁹

Comment No. 6-16

The comment is in regards to the efforts of the Community Relations Department. The commenter reiterates that the purpose of the public meeting is to take public comments and include them in the record. The commenter states that there should be additional meetings with the community prior to construction of the proposed Project where updated information would be provided regarding construction details.

Response to Comment No. 6-16

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

Comment No. 6-17

This comment has two parts; one is in regards to the increase in budget of the proposed Project and the other is in regards to the difference in budget if the construction period were to be cut down to 2 years.

Response to Comment No. 6-17

As responded to by Mr. Singletary during the public meeting on November 21, 2019, the district did conduct an analysis of the budget. The district reanalyzed the budget and presented a new scope, which shows the shift in design and retrofitting the work. Mr. Singletary states that closing the school to reduce the construction time was explored but moving 1,700 to 1,800 students to other campuses is not feasible as there is not enough capacity at other campuses to adequately accommodate the Burroughs MS students.

¹⁹ LAUSD, 2019. Facilities Services Division, School Design Guide Documents, <https://www.laschools.org/new-site/asset-management/school-design-guide>. Accessed May 8, 2020.

Comment No. 6-18

The comment is in regards to informing the neighborhood, parents, and community throughout the construction process and of any potentially hazardous impacts. The commenter also suggests providing information in multiple languages.

Response to Comment No. 6-18

As responded to by the Facilities Team during the public meeting on November 21, 2019, the Community Relations Department will be committed to communicating updates and information to the parents and community regarding the proposed Project. LAUSD also confirmed they would provide information in other languages.

As responded to by Ms. Godek, LAUSD has rigorous safety standards for construction and reassures the commenter that potential hazards will be contained and construction will follow the best practices of the industry. The Draft EIR further addresses any potential hazards as a result of project construction. Specifically, Sections 3.2, Air Quality, 3.5, Hazards and Hazardous Materials, 3.6, Noise, and 3.7, Transportation and Traffic provide in-depth analyses and present Standard Conditions and mitigation measures where necessary for the Project.

Comment No. 6-19

The commenter is concerned the Project would result in empty buildings or over development of the school and buildings that would not be used by the existing student enrollment. The commenter is also concerned about the approach to budget and buildout of the proposed Project.

Response to Comment No. 6-19

As responded to by the Mr. Paek during the public meeting on November 21, 2019, the Project would not change the capacity of the school. The Project would remove portables and the new buildings would accommodate the existing enrollment.

The comment regarding Project budget does not raise an environmental issue with the Draft EIR. No further response is required. This comment is noted and will be provided to the decision makers for review and consideration.

Comment No. 6-20

The commenter is concerned with the five-year construction period and recommends reducing the construction duration of the proposed Project to one summer.

Response to Comment No. 6-20

As responded to by the Facilities Team during the public meeting on November 21, 2019, it is not feasible to construct the proposed Project within a 3-month time frame.

Comment No. 6-21

The commenter suggests closing the school completely for safety reasons.

Response to Comment No. 6-21

The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population and thus, closing the entire school, as the commenter suggests, would require that students be reassigned to other middle schools in the district. This alternative is not feasible as there are no campuses that could accommodate these students.

Comment No. 6-22

The comment includes two parts related to the health and safety of the students onsite during construction; one is in regards to air quality impacts and dust impacts and the second is in regards to remediation of the hazardous materials and the potential for release of hazardous materials into the environment.

Response to Comment No. 6-22

As responded to by Mr. Paek during the public meeting on November 21, 2019, the District's Environmental and Technical Unit, which is a team of experts that oversees the abatement remediation process.

As responded to by Ms. Godek, the District does have a team of experts that are prequalified as well as the Facilities team who oversees the entire process. The proposed Project would have an assigned abatement expert as well as a third-party monitor.

Additionally, as discussed on page 3.2-29 of the Draft EIR, impacts related to the potential exposure of sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs) would be less than significant. Project construction would be subject to all applicable rules and regulations set forth by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). Specifically, diesel-powered equipment and vehicles would be subject to CARB idling limitation as well as engine standards and SCAQMD rules regulating toxic emissions from demolition, construction, and earth-moving activities. Adherence to applicable rules and regulations in addition to LAUSD Standard Conditions would ensure that impacts related to toxic emissions would be less than significant.

Additionally, as concluded in Section 3.5, Hazards, of the Draft EIR, a number of measures would be included as part of the development of the proposed project to prevent. As described on page 3.5-26 of the Draft EIR, the proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD

Rule 402. A site-specific Health and Safety Plan (HASP) shall be prepared for the proposed Project in accordance with current health and safety standards to reduce the potential for accident conditions involving the release of hazardous materials into the environment. The on-site site safety officer SSO would ensure compliance with the dust control measures and HASP. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations. Compliance with regulatory requirements and with the HASP would ensure that the proposed Project would not result in hazardous emissions, materials or substances.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 6-23

The comment is in regards to air quality and potential pollutants in the classrooms during construction.

Response to Comment No. 6-23

As responded to by Ms. Godek during the public meeting on November 21, 2019, there would be a full-time monitor and there would be tests conducted to ensure there are no contaminants in the air from the proposed Project.

Additionally, as discussed on page 3.2-29 of the Draft EIR, impacts related to the potential exposure of sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs) would be less than significant. Project construction would be subject to all applicable rules and regulations set forth by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). Specifically, diesel-powered equipment and vehicles would be subject to CARB idling limitation as well as engine standards and SCAQMD rules regulating toxic emissions from demolition, construction, and earth-moving activities. Adherence to applicable rules and regulations in addition to LAUSD Standard Conditions would ensure that impacts related to toxic emissions would be less than significant.

Additionally, as concluded in Section 3.5, Hazards, of the Draft EIR, a number of measures would be included as part of the development of the proposed project. As described on page 3.5-26 of the Draft EIR, the proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. A site-specific Health and Safety Plan (HASP) shall be prepared for the proposed Project in accordance with current health and safety standards to reduce the potential for accident conditions involving the release of hazardous materials into the environment. The on-site site safety officer SSO would ensure compliance with the dust control measures and HASP. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations. Compliance with regulatory requirements and with the HASP would ensure that the proposed Project would not result in hazardous emissions, materials or substances.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 6-24

The commenter is concerned for a potential increase of Burroughs MS student population and concern for an increase in traffic as a result of the proposed Project.

Response to Comment No. 6-24

The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population.

Additionally, as stated on page 3.7-7 of the Draft EIR, the potential impacts associated with the proposed relocation of the school bus drop-off/pick-up zone, two new driveways on Wilshire Boulevard for the expanded south parking lot, and the relocation of the existing driveway on McCadden Place were evaluated and found to improve circulation along McCadden Place and Wilshire Boulevard. Impacts were determined to be less than significant as taking the school buses off McCadden Place will improve traffic flow.

Comment No. 6-25

The comment is in regards to potential toxins and the effect on the health of the students.

Response to Comment No. 6-25

As discussed on page 3.2-29 of the Draft EIR, impacts related to the potential exposure of sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs) would be less than significant. Project construction would be subject to all applicable rules and regulations set forth by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). Specifically, diesel-powered equipment and vehicles would be subject to CARB idling limitation as well as engine standards and SCAQMD rules regulating toxic emissions from demolition, construction, and earth-moving activities. Adherence to applicable rules and regulations in addition to LAUSD Standard Conditions would ensure that impacts related to toxic emissions would be less than significant.

Additionally, as concluded in Section 3.5, Hazards, of the Draft EIR, a number of measures would be included as part of the development of the proposed project. As described on page 3.5-26 of the Draft EIR, the proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and

migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. A site-specific Health and Safety Plan (HASP) shall be prepared for the proposed Project in accordance with current health and safety standards to reduce the potential for accident conditions involving the release of hazardous materials into the environment. The on-site site safety officer SSO would ensure compliance with the dust control measures and HASP. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations. Compliance with regulatory requirements and with the HASP would ensure that the proposed Project would not result in hazardous emissions, materials or substances.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

Comment No. 6-26

The commenter is concerned with potential noise impacts on children with autism.

Response to Comment No. 6-26

As discussed on page 3.6-23 of the Draft EIR, LAUSD Standard Conditions N-8 and N-9 require site-specific noise control measures to be implemented during the temporary construction activities. Measures to be considered and implemented would include, but would not be limited to, installation of exhaust muffles, proper maintenance of construction equipment, and use of noise barriers. The use of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA (see page 3.6-23). As outlined in the Draft EIR and per the District's standard conditions (SC-N8 and SC-N9) and practices, the loudest construction activities (i.e., demolition) would be scheduled to occur when school is not in session, where feasible. However, as shown in Table 3.6-7 (page 3.6-23), construction noise would exceed applicable thresholds along McCadden Place. Therefore, all feasible noise reduction measures would be implemented to reduce impacts to less-than-significant levels. As discussed on page 3.6-23 of the Draft EIR, these measures would ensure that the potential impacts to all students are reduced or avoided.

Comment No. 6-27

The comment is a recommendation for the use of a neighborhood application for updates regarding the proposed Project construction.

Response to Comment No. 6-27

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

Comment No. 6-28

The comment is in regards to potential toxins and significant impacts to noise.

Response to Comment No. 6-28

As discussed on page 3.2-29 of the Draft EIR, impacts related to the potential exposure of sensitive receptors to substantial pollutant concentrations of toxic air contaminants (TACs) would be less than significant. Project construction would be subject to all applicable rules and regulations set forth by the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD). Specifically, diesel-powered equipment and vehicles would be subject to CARB idling limitation as well as engine standards and SCAQMD rules regulating toxic emissions from demolition, construction, and earth-moving activities. Adherence to applicable rules and regulations in addition to LAUSD Standard Conditions would ensure that impacts related to toxic emissions would be less than significant.

Additionally, as concluded in Section 3.5, Hazards, of the Draft EIR, a number of measures would be included as part of the development of the proposed project. As described on page 3.5-26 of the Draft EIR, the proposed Project would involve the excavation and removal of impacted soil. Dust control measures would be implemented during remedial activities to reduce the potential for fugitive dust and migration of contaminants in compliance with requirements contained in SCAQMD Rule 402. A site-specific Health and Safety Plan (HASP) shall be prepared for the proposed Project in accordance with current health and safety standards to reduce the potential for accident conditions involving the release of hazardous materials into the environment. The on-site site safety officer SSO would ensure compliance with the dust control measures and HASP. Removal of impacted soil would be completed in conformance with federal, state, and local hazardous waste/materials regulations. Compliance with regulatory requirements and with the HASP would ensure that the proposed Project would not result in hazardous emissions, materials or substances.

With regards to dust, the South Coast Air Quality Management District (SCAQMD) Regulation IV, Rules 401, 402, and 403 (see page 3.2-11 of the Draft EIR) prohibit visual emissions of fugitive dust. Rule 403 requires that measures including adding freeboard to haul vehicles, covering loose materials on haul vehicles, watering, and using chemical stabilizers be implemented during all earth moving activities. LAUSD will comply with all requirements set for by the SCAQMD with regard to dust.

In regards to noise impacts, as discussed on page 3.6-23 of the Draft EIR, LAUSD Standard Conditions N-8 and N-9 require site-specific noise control measures to be implemented during construction. Measures to be considered and implemented would include, but would not be limited to, installation of exhaust muffles, proper maintenance of construction equipment, and use of noise barriers. The use of a temporary 15-foot high noise barrier with acoustical blankets with a minimum sound transmission class (STC) of 25 and noise reduction coefficient (NRC) of 0.75 can reduce noise levels by up to 20 dBA (see page 3.6-23). As shown in Table 3.6-7 (page 3.6-23), construction noise would exceed applicable thresholds along McCadden Place. Therefore, all feasible noise reduction measures would be implemented to reduce impacts.

Comment No. 6-29

The comment is in regards to the design of the buildings for the proposed Project. The commenter is concerned that modernized design of the new buildings would conflict with the current visual character.

Response to Comment No. 6-29

As described in Chapter 3.1, Aesthetics, pages 3.1-8 and 3.1-9 of the Draft EIR, the proposed Project would incorporate measures from the LAUSD School Design Guide to protect the character and quality of the site and its surroundings. For example, the Project design team included a qualified historic architect who provided input on the design throughout the planning process. The Project objectives and designs have been extensively reviewed by the design team to provide a design that was sensitive to the historic nature of the campus and that met the current and future academic, programmatic, and operational needs of the students and campus. The new buildings have been designed to be compatible with Burroughs MS in terms of scale, materials, and landscaping.

The Project would also implement SCs that are designed to retain the visual character and quality of the site. Implementation of SC-AE-1 requires consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review. SC-AE-1 requires that architectural quality consider compatibility with the surrounding community. Under SC-AE-1, reuse rather than destruction of historic resources is the preferred method, with the multiple goals of: 1) retaining and preserving the historic character of a building, structure, or site; treating distinctive architectural features or examples of skilled craftsmanship with sensitivity; concealing reinforcement required for structural stability or life, safety, or mechanical systems; and conducting surface cleaning of historic structures by the gentlest means possible. SC-AE-2 includes design measures and use of materials to reduce aesthetic impacts to deter vandalism. SC-AE-3 requires appropriate design changes to reduce or eliminate significant adverse aesthetic impacts resulting from a proposed school project's building or site design. These design changes could include, but are not necessarily limited to, changes to the campus layout, height of buildings, and/or architectural style of buildings. SC-AE-5 and SC-AE-6 requires reduction of lighting intensity from new sources on adjacent residences and measures to minimize the impact of lighting styles and technologies to sky glow, respectively. LAUSD SC-CUL-1 and SC-CUL-2 would ensure the proposed modernization of contributors and the design of new buildings would conform to the Secretary of the Interior's Standards for Rehabilitation, specifically Standards 9 and 10 for new construction (as discussed in the Historic Resources Technical Report for the Project Draft EIR Appendix E2), and LAUSD requirements and guidelines for the treatment of historical resources under the guidance of a qualified historic architect. The view of Building B (three-story building) from the right-of-way would show proportional massing, design, and material finish that would resonate with the existing historical brick masonry buildings. Figure 3.1-1 of the Draft EIR illustrates the view of Building B from South McCadden Place.

Comment No. 6-30

The commenter recommends that the community members legally challenge the proposed Project.

Response to Comment No. 6-30

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

Comment No. 6-31

The comment is advocating for the closure of the school for two years to allow for construction, and recommends that the existing Burroughs MS are moved to schools that are not full, such as Bancroft and RFK during construction.

Response to Comment No. 6-31

The purpose of the Project is to modernize and bring its facilities up to current seismic and accessibility requirements while continuing to serve the students residing within its enrollment boundary. As stated on page 2-7 of the Draft EIR, for the academic year 2016-2017, total enrollment at Burroughs MS was 1,786 students. Therefore, the Project would better serve its existing student population and would not result in an increase of the student population and thus, closing the entire school for two years, as the commenter suggests, would require that students be reassigned to other middle schools in the district. This alternative is not feasible as there are no campuses that could accommodate such a large influx of students, if the school were to close for two years.

Comment No. 6-32

The comment includes two parts; one is asking for additional information on the bidding process during construction and its accuracy and the second is in regards to the current budget.

Response to Comment No. 6-32

As responded to by Mr. Singletary during the public meeting on November 21, 2019, the district uses cost estimators before going out to bid and once it goes out to bid, there is a public contract code the district follows. Projections have been estimated using the construction market and market trends, which allows for more accuracy in estimates. In regards to budget, the district anticipates it should adequately satisfy the proposed Project.

Comment No. 6-33

The comment is asking where kids would be placed for physical education during the construction period and keeping the students and parents informed.

Response to Comment No. 6-33

As discussed on page 2-12 of the Draft EIR, a number of project-specific objectives have been developed, including Objective 4, which aims to maximize site efficiency and outdoor playground space for students. LAUSD provides temporary or alternate facilities to ensure that physical education continues when these facilities are unavailable during construction.

Comment No. 6-34

The comment is in regards to the current cost of the proposed Project prior to construction.

Response to Comment No. 6-34

As responded to by Mr. Singletary during the public meeting on November 21, 2019, there is no exact number but the design process estimates 10 to 20 percent of the overall project for the design phase.

CHAPTER 10

Mitigation Monitoring and Reporting Program

10.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the State California Environmental Quality Act (CEQA) Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines.

The Los Angeles Unified School District (LAUSD) is the Lead Agency for the proposed Project and therefore is responsible for administering and implementing the MMRP.

The proposed Project and all other LAUSD School Upgrade Program-related projects are required to comply with design standards, conditions, and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the LAUSD Standard Conditions of Approval,¹ as applicable by incorporating features and conditions into the Project definition and design.

LAUSD Standard Conditions of Approval are uniformly applied development standards that were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as from the District’s typically applied mitigation measures. The Standard Conditions were adopted by the LAUSD Board of Education in February 2019.^{2,3} The Standard Conditions of Approval have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations, and the Los Angeles Unified School District’s standard policies, practices, and specifications. The conditions are divided into the 18 LAUSD CEQA environmental topics (Appendix G of the CEQA Guidelines plus Pedestrian

¹ LAUSD. 2019. Standard Conditions of Approval, Program EIR for the SUP. Available at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/135/2018_Standard_Conditions_UPDATE_final.pdf.

² Ibid.

³ LAUSD Regular Meeting Stamped Order of Business. 333 South Beaudry Avenue, Board Room, 1 p.m., Tuesday, November 10, 2015 (Board of Education Report No. 159 – 15/16).

Safety).⁴ For each Standard Condition of Approval compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the proposed Project. The evaluation of the proposed Project's impacts in the EIR takes into consideration the Standard Conditions, which were voluntarily incorporated into the project description, and applies mitigation measures needed to avoid or reduce potentially significant environmental impacts. This MMRP, shown in **Table 10-1** below, is designed to monitor implementation of the Standard Conditions and mitigation measures identified for the proposed Project.

⁴ As of September 2016, an additional environmental topic has since been required by the State Office of Planning and Research (Tribal Cultural Resources). The LAUSD Environmental Checklist now has 19 topics.

**TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
Aesthetics						
<p>SC-AE-1</p> <p>LAUSD shall review all designs to ensure that demolition of existing buildings or construction of new buildings on its historic campuses are designed to ensure compatibility with the existing campus. The School Design Guide shall be used as a reference to guide the design.</p> <p>School Design Guide</p> <p>This document outlines measures for re-use rather than destruction of historical resources. It requires the consideration of architectural appearance/consistency and other aesthetic factors during the preliminary design review for a proposed school upgrade project. Architectural quality must consider compatibility with the surrounding community.</p>	Prior to construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-AE-2</p> <p>LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts.</p> <p>School Design Guide</p> <p>This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.</p>	Prior to construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-AE-3</p> <p>LAUSD shall assess the proposed project’s consistency with the general character of the surrounding neighborhood, including, but not limited to, any proposed changes to the density, height, bulk, and setback of new buildings (including stadiums), additions, or renovations. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes may include, but are not limited to, changes to the campus layout, height of buildings, landscaping, and/or the architectural style of buildings.</p>	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-AE-5</p> <p>LAUSD shall review all designs and test new lights following installation to ensure that adverse light trespass and glare impacts are avoided.</p> <p>School Design Guide</p> <p>This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light trespass onto adjacent properties.</p>	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-AE-6</p> <p>The International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used as a guide for environmentally responsible outdoor lighting. The MLO has outdoor lighting standards that reduce glare, light trespass, and skyglow. The MLO uses lighting zones (LZ) 0 to 4, which allow the District to vary the lighting restrictions according to the sensitivity of the community. The MLO also incorporates the Backlight-Uplight Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. The MLO establishes standards to:</p> <ul style="list-style-type: none"> • Limit the amount of light that can be used. • Minimize glare by controlling the amount of light that tends to create glare. • Minimize sky glow by controlling the amount of uplight. • Minimize the amount of off-site impacts or light trespass. 	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-CUL-1</p> <p>Historic Architect</p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties</p>	During project design, pre-construction and construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>and LAUSD requirements and guidelines for the treatment of historical resources.</p> <p>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. • The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. • The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design 						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review.</p> <ul style="list-style-type: none"> The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. <p>The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</p>						
<p>SC-CUL-2</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> Retain and preserve the character of historic resources. Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. 	During project design, design development, pre-construction and construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.						
Air Quality						
SC-AQ-2	LAUSD's construction contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization		
SC-AQ-3	<p>LAUSD's construction contractor shall:</p> <ul style="list-style-type: none"> • Maintain speeds of 15 miles per hour (mph) or less with all vehicles. • Load impacted soil directly into transportation trucks to minimize soil handling. • Water/mist soil as it is being excavated and loaded onto the transportation trucks. • Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. • Minimize soil drop height into haul trucks or stockpiles during dumping. • During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. • Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. • Place stockpiled soil on polyethylene sheeting and cover with similar material. • Place stockpiled soil in areas shielded from prevailing winds. 	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization		

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-AQ-4</p> <p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following:</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. • Utilize ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Utilize electrical power rather than internal combustion engine power generators. • Utilize electric or alternatively fueled equipment, as feasible. 	<p>During planning and construction</p> <p>(Planning & Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> • Utilize construction equipment with the minimum practical engine size. • Utilize low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p>Fugitive Dust</p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for ten days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all unimproved construction access roads for at least 100 feet from the main road to the Project site. • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a five percent or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. 						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance			
				Initials	Date	Remarks	
<ul style="list-style-type: none"> Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p>General Construction</p> <ul style="list-style-type: none"> Utilize ultra-low VOC or zero-VOC surface coatings. Phase construction activities to minimize maximum daily emissions. Configure construction parking to minimize traffic interference. Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). Prepare and implement a trip reduction plan for construction employees. Implement a shuttle service to and from retail services and food establishments during lunch hours. Increase distance between emission sources to reduce near-field emission impacts. 							
Cultural							
MM-CUL-1	The Qualified Paleontologist shall conduct initial construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Subsequent training session may be provided by a paleontological monitor or in a video format. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found. Documentation shall be retained demonstrating that all construction personnel attended the training.	Pre-Construction	Los Angeles Unified School District (LAUSD)	City of Los Angeles qualified Archaeologist			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>MM-CUL-2</p> <p>Paleontological monitoring of previously undisturbed sediment shall be conducted by a qualified paleontological monitor (SVP, 2010) under the supervision of the Qualified Paleontologist as follows:</p> <ul style="list-style-type: none"> In areas mapped as younger Quaternary Alluvium (Qa), full-time paleontological monitoring shall commence once excavations have exceeded 10 feet in depth. Monitoring is not necessary in shallow excavations (<10 feet) or in artificial fill. In areas mapped as older Quaternary Alluvium (Qae), full-time paleontological monitoring shall be conducted for all ground-disturbing activities, regardless of depth. Monitoring is not necessary in artificial fill. <p>Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. Any significant fossils collected during project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The Qualified Paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort.</p>	Pre-Construction	Los Angeles Unified School District (LAUSD)	City of Los Angeles qualified Archaeologist and Pechanga tribal representatives			
<p>MM-CUL-3</p> <p>If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. If the find is deemed significant, it should be salvaged following the standards of the SVP (SVP, 2010) and curated with a certified repository.</p>	Pre-Construction/ Construction	Los Angeles Unified School District (LAUSD)	City of Los Angeles qualified Archaeologist and Pechanga tribal representatives			
<p>MM-CUL-4</p> <p>Should fossils be encountered in asphaltic sands during the course of excavations, the Qualified Paleontologist will contact the paleontological staff of the La Brea Tar Pits & Museum for coordination of excavation and salvage procedures. Any fossil material from asphaltic sands shall be collected and deposited at the La Brea Tar Pits & Museum, with preparation and curation fees to be assessed on a case-by-case basis.</p>	Pre-Construction/ Construction	Los Angeles Unified School District (LAUSD)	City of Los Angeles qualified Archaeologist and Pechanga tribal representatives			

<p>SC-CUL-1</p>	<p>Historic Architect</p> <p>For projects involving structural upgrades to historic resources, the Design Team shall include a qualified Historic Architect with demonstrated project-level experience in historic projects.</p> <p>For campuses with qualifying historical resources under CEQA, the Design Team shall include a LAUSD-qualified Historic Architect. The Historic Architect/s shall meet the Secretary of the Interior’s Professional Qualifications Standards and the standards described on page 8 of the LAUSD Design Guidelines and Treatment Approaches for Historic Schools.</p> <p>Throughout the project design progress the Historic Architect shall provide input to ensure compliance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD requirements and guidelines for the treatment of historical resources.</p> <p>Role of the Historic Architect</p> <p>The tasks of the Historic Architect on the Design Team shall include, but are not limited to:</p> <ul style="list-style-type: none"> • The Historic Architect shall work with the Design Team (including the Structural Engineer) and LAUSD to ensure that project components, including new construction and modernization of existing facilities, comply with the Secretary of the Interior’s Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The Historic Architect shall work with the Design Team and LAUSD throughout the design process to develop project options that facilitate compliance with the applicable historic preservation standards. • For new construction, the Historic Architect shall work with the Design Team and LAUSD to identify options and opportunities for: (1) ensuring compatibility of scale and character for new construction, site and landscape features, and circulation corridors, and (2) ensuring that new construction is designed and sited in such a way that reinforces and strengthens, as much as feasible, character-defining site plan features, landscaping, and circulation corridors throughout campus. • For modernization and upgrade projects involving contributing (significant) buildings or features, the Historic Architect shall work with the Design Team and LAUSD to ensure that specifications for design and implementation of projects comply with the applicable historic preservation standards. 	<p>During project design, pre-construction and construction</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			
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Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> The Historic Architect shall participate in Design Team meetings during all phases of the project through 100% construction drawings, pre-construction, and construction phases, as applicable. The Historic Architect shall prepare a memo at the 50% and at the 100% construction drawings stages, demonstrating how principal project components and treatment approaches comply with applicable historic preservation standards, including the Secretary of the Interior's Standards for the Treatment of Historic Properties and LAUSD Design Guidelines and Treatment Approaches for Historic Schools. The memos shall be submitted to LAUSD OEHS for review. The Historic Architect shall participate in pre-construction and construction monitoring activities, as appropriate, to ensure continuing conformance with Secretary's Standards and/or avoidance of a material impairment of the historical resources. The Historic Architect shall provide specifications for architectural features or materials requiring restoration or removal, maintaining and protecting relevant features in place, or on-site storage. Specifications shall include detailed drawings or instructions where historic features may be impacted. <p>The Design Team and Historic Architect shall be responsible for incorporating LAUSD's recommended updates and revisions during the design development and review process.</p>						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-CUL-2</p> <p>LAUSD shall follow the guidelines outlined in these documents to the maximum extent practicable when planning and implementing projects and adjacent new construction involving historical resources.</p> <p>The Design Team, Historic Architect, and Construction Contractor shall apply LAUSD School Design Guide and LAUSD Design Guidelines and Treatment Approaches for Historic Schools and the Secretary's Standards for all new construction and modernization projects. In keeping with the District's adopted policies and goals, historical resources shall be reused rather than destroyed, where feasible.</p> <p>General guidelines include:</p> <ul style="list-style-type: none"> • Retain and preserve the character of historic resources. • Repair rather than remove, replace, or destroy character-defining features; if replacement is necessary, replace in-kind to match materials, dimensions, and appearance. • Treat distinctive architectural features or examples of skilled craftsmanship that characterize a building with sensitivity. • Where practical, conceal reinforcement required for structural stability or the installation of life safety or mechanical systems. <p>Where necessary to halt deterioration and after the preparation of a condition assessment, undertake surface cleaning, preparation of surfaces, and other projects involving character-defining features using the least invasive, gentlest means possible. Avoid using any abrasive materials or methods including sandblasting and chemical treatments.</p>	<p>During project design, design development, pre-construction and construction</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-CUL-3</p> <p>Prior to any major alteration to or adjacent to a historic resource that may potentially damage historic resources (or previously identified historic features), the Historic Architect shall develop a Temporary Protection Plan that identifies potential risks to the historic resource. The Temporary Protection Plan shall be prepared in coordination with the Construction Contractor and LAUSD prior to demolition or construction. The Temporary Protection Plan may include, but not be limited to, the following components:</p> <ul style="list-style-type: none"> • Notation of the historic resource on construction plans. • Pre-construction survey to document the existing physical condition of the historic resource. • Procedures and timing for the placement and removal of temporary protection features, around the historic resource. • Monitoring of the installation and removal of temporary protection features by the Historic Architect, or designee. • Post-construction survey to document the condition of the historic resource after Project completion. <p>Preparation of a technical memorandum documenting the pre-construction and post-construction conditions of the historic resource and compliance with protective measures outlined Temporary Protection Plan.</p>	<p>Prior to demolition or major alteration (Planning, Pre-Construction, Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			
<p>SC-CUL-4</p> <p>Prior to significant alteration or demolition of a historical resource, LAUSD shall retain an Architectural Photographer and/or a Historian or Architectural Historian who meet the Secretary of the Interior’s Professional Qualifications Standards and who shall prepare a HABS-like Historic Documentation Package (Package).</p> <p>The Package shall include photographs and descriptive narrative. Documentation will draw upon primary- and secondary-source research including available studies prepared for the property (measured drawings are not required). The specifications for the Package include:</p> <ul style="list-style-type: none"> • Photographs: Photographic documentation shall focus on the historical resources/features proposed to be significantly altered or demolished, with overview and context photographs for the campus and adjacent setting. A professional-quality camera will be used to take photographs of interior and exterior features of the buildings. Photographs 	<p>Prior to demolition or major alteration (Planning, Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>will include context views, elevations/exteriors, architectural details, overall interiors, and interior details (if warranted). Digital photographs will be in black and white (as well as in color or as requested by the District) and provided in an electronic format.</p> <ul style="list-style-type: none"> Descriptive and Historic Narrative: The Historian or Architectural Historian shall prepare descriptive and historic narrative of the historical resources/features. Physical descriptions will detail each resource, elevation by elevation, with accompanying photographs and information on how the resource fits within the broader campus during its period of significance. The historic narrative will include available information on the campus design, history, architect/contractor/designer as appropriate, history of the area, and historic context. In addition, the narrative will include a methodology section specifying the name of researcher, date of research, and sources/archives visited, as well as a bibliography. Within the written history, statements shall be footnoted as to their sources, where appropriate. <p>Historic Documentation Package Submittal: Upon completion of the descriptive and historic narrative, all materials will be compiled in electronic format and presented to LAUSD for review and comment. Upon approval, one electronic copy and one hard copy shall be submitted to LAUSD OEHS. Photographs will be individually labeled and provided to LAUSD in electronic format.</p>						
<p>SC-CUL-5</p> <p>LAUSD shall comply with Design Specification 01 3591, Historic Treatment Procedures, as applicable. This Specification requires the Construction Contractor to submit a Historic Treatment Plan to the District for the protection, repair, and replacement of historic materials and features.</p>	<p>Prior to demolition or alteration (Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			
<p>SC-CUL-6</p> <p>LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39). The archaeologist must have knowledge of both prehistoric and historical archaeology.</p> <p>To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7.</p>	<p>Prior to and during ground-disturbing activities (Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

<p>SC-CUL-7</p>	<p>The Construction Contractor shall halt construction activities within a 30-foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • LAUSD shall retain an Archaeologist that meets the Secretary of the Interior’s Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. • The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources. • The Archaeologist shall be afforded the necessary time to recover and assess the find. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. • If the find is determined to be of value, the Archaeologist shall prepare an Archaeological Monitoring Program and shall monitor the remainder of the ground-disturbing activities. • Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. • Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. • The Archaeological Monitoring Plan shall include: <ul style="list-style-type: none"> ○ Extent and duration of the monitoring based on the grading plans ○ At what soil depths monitoring of earthmoving activities shall be required ○ Location of areas to be monitored ○ Types of artifacts anticipated ○ Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources ○ Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources 	<p>During ground-disturbing activities (Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			
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Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> ○ Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. ○ Accommodation and procedures for Native American monitors, if required. ○ Procedures for discovery of Native American cultural resources. ○ The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan. 						
SC-CUL-8	<p>Cultural resources sensitivity training shall be conducted for all construction workers involved in ground-disturbing activities. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.</p>	<p>Prior to the start grading, excavation, or other ground-disturbing activities (Construction)</p>	<p>Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization</p>	<p>Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization</p>		
SC-CUL-9	<p>LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.</p>	<p>During ground-disturbing activities (Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>		
SC-CUL-10	<p>All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.</p>	<p>During ground-disturbing activities (Construction)</p>	<p>Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization</p>	<p>Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization</p>		

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<p>SC-CUL-11</p> <p>LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.</p> <p>If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.</p> <ul style="list-style-type: none"> • Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist. • The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources. <p>Significant resources found shall be curated as determined necessary by the Paleontologist.</p>	<p>During ground-disturbing activities (Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-N-7</p> <p>LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the construction contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> • Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building. • The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building. • The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. • During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. • During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue "stop-work" orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented. 	Prior to and during demolition and construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
Energy						
<p>SC-USS-1</p> <p>Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:</p> <p>School Design Guide.</p> <p>Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.</p>	Construction	Los Angeles Unified School District (LAUSD)	City of Los Angeles Building Official or other Designee			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>Construction & Demolition Waste Management.</p> <p>This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.</p>						
<p>SC-AQ-4</p> <p>LAUSD shall analyze air quality impacts:</p> <p>If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds.</p> <p>Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.</p> <p>Exhaust Emissions</p> <ul style="list-style-type: none"> • Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM). • Consolidate truck deliveries and limit the number of haul trips per day. • Route construction trucks off congested streets, as permitted by local jurisdiction haul routes. • Employ high pressure fuel injection systems or engine timing retardation. 	<p>During planning and construction (Planning & Construction)</p>	<p>LAUSD, Office of Environmental Health and Safety</p>	<p>LAUSD, Office of Environmental Health and Safety</p>			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<ul style="list-style-type: none"> • Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment. • Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower. • Restrict non-essential diesel engine idle time, to not more than five consecutive minutes. • Use electrical power rather than internal combustion engine power generators. • Use electric or alternatively fueled equipment, as feasible. • Use construction equipment with the minimum practical engine size. • Use low-emission on-road construction fleet vehicles. • Ensure construction equipment is properly serviced and maintained to the manufacturer's standards. <p>Fugitive Dust</p> <ul style="list-style-type: none"> • Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more). • Replace ground cover in disturbed areas as quickly as possible. • Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water). • Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip. • Pave unimproved construction roads that have a traffic volume of more than 50 daily trips by construction equipment, and/or 150 daily trips for all vehicles. • Pave all unimproved construction access roads for at least 100 feet from the main road to the project site. 						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> • Enclose, cover, water twice daily, or apply non-toxic soil binders according to manufacturers' specifications to exposed piles (i.e., gravel, dirt, and sand) with a 5% or greater silt content. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour (mph). • Water disturbed areas of the active construction and unpaved road surfaces at least three times daily, except during periods of rainfall. • Limit traffic speeds on unpaved roads to 15 mph or less. • Prohibit fugitive dust activities on days where violations of the ambient air quality standard have been forecast by SCAQMD. • Tarp and/or maintain a minimum of 24 inches of freeboard on trucks hauling dirt, sand, soil, or other loose materials. • Limit the amount of daily soil and/or demolition debris loaded and hauled per day. <p>General Construction</p> <ul style="list-style-type: none"> • Use ultra-low VOC or zero-VOC surface coatings. • Phase construction activities to minimize maximum daily emissions. • Configure construction parking to minimize traffic interference. • Provide temporary traffic control during construction activities to improve traffic flow (e.g., flag person). • Prepare and implement a trip reduction plan for construction employees. • Implement a shuttle service to and from retail services and food establishments during lunch hours. • Increase distance between emission sources to reduce near-field emission impacts. 						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance			
				Initials	Date	Remarks	
SC-GHG-1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	During School operation	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
SC-GHG-2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.	Post-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
SC-GHG-3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.	Post-construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
SC-GHG-4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.	Construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
SC-GHG-5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.	Planning and Construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
Hazards and Hazardous Materials							
SC-HAZ-1	<p>LAUSD shall determine the proximity of electromagnetic field (EMF) generators to new classrooms or outdoor play areas to ensure the EMF generator does not pose a threat.</p> <p>Criteria for School Siting in Proximity to High Voltage Power Lines or Cell Towers</p> <p>Board of Education resolutions (Effects of Non-Ionizing Radiation-2000, Wireless Telecommunication Installations - 2009 and T-Mobile - Cell Tower Notification and Condemnation-2009) regarding electromagnetic field (EMF) and radio frequency exposures associated with cellular towers near schools whereby a prohibition exists regarding siting towers on school campuses.</p>	During project design (Planning)					

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
LAUSD's screening perimeter for new classroom construction or outdoor play area is 200 feet from cell towers and 500 feet from high voltage power lines.						
<p>SC-HAZ-2</p> <p>LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone.</p> <p>Pipeline Safety Hazard Analysis</p> <p>This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product, and crude oil from pipelines located near a school site pose a safety risk to students and staff.</p>	During project design (Planning)					
<p>SC-HAZ-3</p> <p>LAUSD shall prepare a Rail Safety Study (RSS) for the construction of any new classrooms or outdoor play areas that would be located within 1,500 feet of an existing rail line. For construction on existing campuses, if a proposed scope of work has the potential to exacerbate a safety hazard, a RSS will be triggered.</p> <p>Rail Safety Study Protocol</p> <p>This document provides a guidance protocol for conducting a RSS. It is designed to assist in evaluating whether traffic on rail lines within a 1,500-foot radius of a school site poses an unreasonable safety hazard to students and staff at the school.</p>	During project design (Planning)					
<p>SC-AQ-1</p> <p>LAUSD shall complete a Health Risk Assessment for new campus locations that would place classrooms or play areas within close proximity (less than 0.25 mile) of existing sources of adverse emissions.</p> <p>LAUSD shall identify all permitted and non-permitted stationary sources, freeways and other busy traffic corridors, railyards, and large agricultural operations within 0.25 mile of the project. Once identified, make a determination about the need for qualitative evaluation, screening level evaluation in accordance with air district specific guidance and tools, or a refined evaluation with air dispersion modeling, to determine the if risks constitute an actual or potential endangerment of public health to persons who would attend or be employed at the school.</p>	During project design (Planning)	During planning and construction (Planning & Construction)	LAUSD, Office of Environmental Health and Safety			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<p>For freeways and other busy traffic corridors within 500 feet, air dispersion modeling must be used to make the health risk determination (no screening, no qualitative discussion, etc.).</p> <p>The Health Risk Assessment shall comply with 'Air Toxics Health Risk Assessment (HRA)'. This document includes guidance on HRA protocols for permitted, non-permitted, and mobile sources that might reasonably be anticipated to emit hazardous air emissions and result in potential long-term and short-term health impacts to student and staff at the school site.</p> <p>The HRA must find that health risks are below criteria thresholds. If health risks which exceed air district criteria thresholds are identified, the school campus shall be redesigned or relocated to a site farther from the emissions generator.</p>						
Noise						
MM-NOI-1	In order to ensure that construction noise does not exceed 67 dBA Leq at the exterior of any occupied classroom (i.e., when class is in session), the use of motorized construction equipment shall be prohibited within 80 feet of any occupied classroom. All construction work requiring the use of motorized construction equipment within 80 feet of a classroom shall occur after regular school hours.	During Project design	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization		
MM-NOI-2	Implementation of the following mitigation measure is required to reduce impacts related to structural damage during construction: To avoid structural damage, when the construction equipment is within 15 feet of existing school buildings, large construction equipment (greater than 300 horsepower), such as large bulldozer and loaded trucks, should be replaced with smaller equipment (less than 300 horsepower) when feasible.	Prior to and during demolition and construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety		
MM-NOI-3	In the event that construction activity would occur within 30 feet of occupied classrooms or residences, large construction equipment (greater than 300 horsepower), such as large bulldozer and loaded trucks, should be replaced with smaller equipment (less than 300 horsepower) when feasible.	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization		

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<p>SC-N-1</p> <p>LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuate exterior noise levels on a school campus to less than 67 dBA L_{eq}.</p>	During Project design (Planning)	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-N-2</p> <p>LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA L_{eq} with a target of 40 dBA L_{eq} (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features.</p> <ul style="list-style-type: none"> • New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA L_{eq}. • New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA L_{eq}. • Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. • The District’s purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. • Existing HVAC units operating in excess of 45 dBA L_{eq} inside classrooms should be modified. 	During Project design (Planning)	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<p>SC-N-3</p> <p>LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.</p> <p>Operational noise attenuation measures include, but are not limited to:</p> <ul style="list-style-type: none"> • Buffer zones; • Berms; • Sound barriers; • Buildings • Masonry walls; • Enclosed bleacher foot wells; and/or • Other site-specific project design features. 	During Project design and construction (Planning, Construction)	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-N-4</p> <p>LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as-needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.</p>	Prior to and during construction (Construction)	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-N-5</p> <p>LAUSD shall require the Construction Contractor to minimize blasting for all demolition activities, where feasible.</p>	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-N-6</p> <p>For projects where pile driving activities are required within 150 feet of a structure, a detailed vibration assessment shall be provided by an acoustical engineer to analyze potential impacts related to vibration to nearby structures and to determine feasible mitigation measures to eliminate potential risk of architectural damage.</p>	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<p>SC-N-7</p> <p>LAUSD shall meet with the construction contractor to discuss alternative methods of demolition and construction for activities within 25 feet of a historic building to reduce vibration impacts. During the preconstruction meeting, the construction contractor shall identify demolition methods not involving vibration-intensive construction equipment or activities. For example: sawing into sections that can be loaded onto trucks results in lower vibration levels than demolition by hydraulic hammers.</p> <ul style="list-style-type: none"> • Prior to construction activities, the construction contractor shall inspect and report on the current foundation and structural condition of the historic building. • The construction contractor shall implement alternative methods identified in the preconstruction meeting during demolition, excavation, and construction for work done within 25 feet of the historic building. • The construction contractor shall avoid use of vibratory rollers and packers adjacent to a historic building. • During demolition the construction contractor shall not phase any ground-impacting operations near a historic building to occur at the same time as any ground impacting operation associated with demolition and construction of a new building. <p>During demolition and construction, if any vibration levels cause cosmetic or structural damage to a historic building the District shall issue “stop-work” orders to the construction contractor immediately to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures to relieve further damage to the building are implemented.</p>	Prior to and during demolition and construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			
<p>SC-N-8</p> <p>Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determine what, if any, feasible project specific noise reduction measures are needed.</p> <p>The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:</p> <p><u>Source Controls</u></p> <ul style="list-style-type: none"> • Time Constraints – prohibiting work during sensitive nighttime hours 	Construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
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<ul style="list-style-type: none"> • Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM). • Equipment Restrictions – restricting the type of equipment used. • Substitute Methods – using quieter methods and/or equipment. • Exhaust Mufflers – ensuring equipment has quality mufflers installed. • Lubrication & Maintenance – well maintained equipment is quieter. • Reduced Power Operation – use only necessary size and power. • Limit Equipment On-Site – only have necessary equipment on-site. • Noise Compliance Monitoring – technician on site to ensure compliance. • Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p><u>Path Controls</u></p> <ul style="list-style-type: none"> • Noise Barriers – semi-permanent or portable wooden or concrete barriers. • Noise Curtains – flexible intervening curtain systems hung from supports. • Enclosures – encasing localized and stationary noise sources. • Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment. <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> • Window Treatments – reinforcing the building’s noise reduction ability. 						

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> Community Participation – open dialog to involve affected residents. Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction shall be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive. 						
<p>SC-N-9</p> <p>Construction Contractor shall ensure that LAUSD interior classroom noise and exterior noise standard are met to the maximum extent feasible, or that construction noise is not disruptive to the school environment, through implementation of noise control measures, as necessary.¹ Noise construction measures may include, but are not limited to:</p> <p><u>Path Controls</u></p> <ul style="list-style-type: none"> Noise Attenuation Barriers² – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers. <p><u>Source Controls</u></p> <ul style="list-style-type: none"> Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00 PM). Substitute Methods – using quieter methods and/or equipment. Exhaust Mufflers - ensuring equipment has quality mufflers installed. Lubrication & Maintenance – well maintained equipment is quieter. Reduced Power Operation – use only necessary size and power. 	During construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			

Mitigation Measures (MM) / Standard Conditions of Approval (SC)	Monitoring Phase	Enforcement Agency	Responsible Monitoring Agency	Verification of Compliance		
				Initials	Date	Remarks
<ul style="list-style-type: none"> Limit Equipment On-Site – only have necessary equipment on-site. Quieter Backup Alarms – manually-adjustable or ambient sensitive types. <p>If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD’s noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls:</p> <p><u>Receptor Controls</u></p> <ul style="list-style-type: none"> Temporary Window Treatments – temporarily reinforcing the building’s noise reduction ability. <p>Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity</p>						
Transportation and Traffic						
<p>SC-T-2</p> <p>LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process.</p> <p>School Design Guide</p> <p>Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic:</p> <ul style="list-style-type: none"> Parking Space Requirements General Parking Guidelines Vehicular Access and Pedestrian Safety Parking Structure Security 	Construction	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization	Los Angeles Unified School District (LAUSD) – Facilities Services Division - Modernization			
<p>SC-T-4</p> <p>LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review 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. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.</p>	Construction	LAUSD, Office of Environmental Health and Safety	LAUSD, Office of Environmental Health and Safety			