

5. Comments and Responses

Section 15074(a) of the State CEQA Guidelines requires the Lead Agency (LAUSD) to consider the MND before making its recommendation to approve or deny a project. Additionally, prior to approving a project, LAUSD must consider the MND together with any comments received during the public review process. The MND can be adopted only if they find on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the MND reflects the lead agency's independent judgment and analysis.¹³³ This section provides all written responses received on the Initial Study/MND (IS/MND) and LAUSD's responses to each comment.

5.1 CEQA REQUIREMENTS FOR COMMENTS AND RESPONSES

State CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment be “on the proposed finding that the project will not have a significant effect on the environment.” If persons and public agencies believe that the project may have a significant effect, they should:

- (1) Identify the specific effect,
- (2) Explain why they believe the effect would occur, and
- (3) Explain why they believe the effect would be significant.

State CEQA Guidelines Section 15204 (c) further advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

¹³³ 14 CCR Section 15074(b).



5. Comments and Responses

5.2 NOTICE OF INTENT

Per State CEQA Guidelines Section 15072 and 15073, the LAUSD determined that an MND would be required for this proposed Project and issued a Notice of Intent (NOI) to adopt a MND on November 1, 2019. The public review period for this CEQA document was from November 1, 2019 to December 2, 2019. Public outreach for the proposed Project was initiated in November, 2019. A public meeting was held on November 14, 2019. The meeting, as briefly outlined below, provided the public with an opportunity to provide oral and written comments on the proposed Project.

The public meeting on November 14, 2019 was held in the Auditorium at Kennedy HS from 6 p.m. to approximately 7:30 p.m. The meeting included a presentation of the proposed Project, followed by a question and answer (Q&A) session. During the Q&A session, commenters gave suggestions and expressed the following concerns with the proposed Project:

- Design materials (including questions regarding turf and/or real grass; landscaping, irrigation etc.)
- Seismic Safety
- Security (specifically, measures to protect against active shooters and similar scenarios)
- Provision of new learning tools (e.g. laptops) for students
- Budgeting breakdowns for the proposed Project (i.e. allocation of funds)
- Construction contracting procedures of the LAUSD

No written comments were received at the November 14, 2019 public meeting. Those oral comments that were received (listed above) were addressed by LAUSD during the meeting. Additionally, none of the oral comments pertained to the adequacy of the environmental analyses contained in this IS/MND. As such, pursuant to State CEQA Guidelines Section 15204 (b), oral comments from the November 14, 2019 meeting are not included in this document and do not warrant additional written responses.

Additionally, the NOI was published in two newspapers: La Opinion and the Los Angeles Daily News; mailed to approximately 855 addresses located within a 0.25-mile radius; mailed to over 2,300 current LAUSD students; e-mailed or mailed directly to interested parties, including but not limited to those who expressed interest during the preliminary research and design phase; sent home with Kennedy HS students; and posted at the school. The IS/MND was made available to the public for review at four different locations, as follows:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Ave., 21st Floor, Los Angeles, CA 90017. (213) 241-3417 (by appointment).
- John F. Kennedy High School Main Office, 11254 Gothic Avenue, Los Angeles, CA 91344
- LAUSD Local District Northwest: 6621 Balboa Boulevard, Lake Balboa, CA 91406
- Granada Hills Library, 10640 Petit Avenue, Granada Hills, CA 91344



5. Comments and Responses

The CEQA document was also available on the LAUSD website at: <http://achieve.lausd.net/ceqa>.

5.3 INITIAL STUDY COMMENTS AND RESPONSES

Comment letters and specific comments are given letters and numbers for reference purposes. The following is a list of persons and agencies that submitted comments on the IS/MND during the public review period.

Comment Letter Designation	Commenter	Date of Comment
A	Gabrieleno Band of Mission Indians/Kizh Nation	November 7, 2019
B	Los Angeles County Metropolitan Transportation Authority (Metro)	December 2, 2019
C	California Department of Transportation	December 3, 2019
D	State Clearinghouse, Governor's Office of Planning & Research	December 3, 2019

5. Comments and Responses

This page intentionally left blank.



5. Comments and Responses

Comment Letter A



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Adopt Mitigative Declaration Study / Mitigated Negative Declaration

City of Los Angeles

333 South Beaudry Avenue, 21st Floor

Los Angeles, CA 90017

Good Afternoon Edward Paek,

We have received your Notice of the Adopt Mitigative Negative Declaration for the John F Kennedy High School Comprehensive Project in Los Angeles CA. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

A-1

Sincerely,

Gabrieleno Band of Mission Indians/Kizh Nation

(1844) 390-0787 Office

Andrew Salas, Chairman
Albert Perez, treasurer I

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

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

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

5. Comments and Responses

This page intentionally left blank.



5. Comments and Responses

1. Response to Comments from the Gabrieleno Band of Mission Indians/Kizh Nation, dated November 7, 2019

A-1 This comment, received from the Gabrieleno Band of Mission Indians/Kizh Nation, requests that LAUSD consult with the Gabrieleno Band of Mission Indians/Kizh Nation if any ground disturbance activities would take place under the Project.

Section V of the IS/MND addresses the potential effects of the project on cultural resources, and Section XIX of the IS/MND addresses the potential effects of the project on tribal cultural resources. As stated in Section XIX, in a Sacred Lands File (SLF) results letter dated February 13, 2019, the NAHC stated that the SLF search was completed with positive results, though the NAHC did not specify whether or not any TCRs had been identified within the proposed Project site. Additionally, the CHRIS records search identified three resources within 0.5 mile (804 meters) of the proposed Project site, two of which include Native American or prehistoric cultural resources; however, none of these resources intersect or overlap the proposed Project site. Due to the fact that no listed or eligible for listing CRHR, or locally registered resources, are present within the proposed Project site, the proposed Project would have a less-than-significant impact on TCRs (see Appendix D for details).

However, as stated in Section V and XIX, it is possible that previously undiscovered intact archaeological deposits are present at subsurface levels and could be uncovered during the Project's ground-disturbing activities. Standard Conditions SC-TCR-1 and SC-TCR-2, as well as mitigation measures MM-TCR-1 and MM-TCR-2 would be incorporated to further mitigate any potential impacts to unknown tribal cultural resources. Mitigation measure MM-TCR-1 would ensure that in the event that Native American cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) would cease and a qualified archaeologist meeting Secretary of Interior standards would assess the find. The affiliated Native American Tribal representative would be contacted to consult if any such find occurs. The archaeologist would complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to LAUSD, the affiliated Native American Tribal representative, and consulting Tribes. If the Native American cultural resource is determined to be significant, as defined by the affiliated Native American Tribal representative, a Native American archaeological monitor retained by the qualified Project Archaeologist and approved by the District, shall be present for all ground disturbing activities that occur within the proposed Project area. The archaeologist and Tribal monitor(s) will have the authority to request ground disturbing activities cease within the immediate area of a discovery to assess potential finds in real time. Mitigation measure MM-TCR-2 would ensure that LAUSD consults with the affiliated Native American Tribal representative and consulting Tribes on the disposition and treatment of any artifacts or other cultural materials, if encountered during Project grading.

Given the above, the requests made in this comment letter would be fulfilled through implementation of Standard Conditions SC-TCR-1, SC-TCR-2 and mitigation measures MM-TCR-1 and MM-TCR-2. These measures provide the appropriate recourse for an unlikely scenario where archaeological and/or tribal cultural resources are unearthed, as well as Native American involvement for any finds that may

5. Comments and Responses

be Native American remains and/or tribal cultural resources. Pursuant to mitigation measure MM-TCR-1, the affiliated Native American Tribal representative would be contacted to consult if any such find occurs. In the scenario where previously unknown tribal cultural resources are unearthed and mitigation measure MM-TCR-1 is implemented, the Gabrieleno Band of Mission Indians/Kizh Nation could then make recommendations specific to the find, which could include additional monitoring of future ground disturbance activities, treatment of the resources, etc.



5. Comments and Responses

Comment Letter B



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

December 2, 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: Kennedy HS Comp Mod: 11254 Gothic Avenue – Negative Declaration

Dear Mr. Paek:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed John F. Kennedy High School Comprehensive Modernization Project (Project) located at 11254 Gothic Avenue 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.

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 Negative Declaration. 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 and removal of 22 relocatable buildings and construction of a new 20,500 square-foot building (that will provide ten new classrooms). The Project is located South of Simonds Street, West of Woodley Avenue, North of San Fernando Mission Boulevard, and East of Gothic Avenue.

Comments

Bus Stop Adjacency

1. Service: Metro Bus Line 237 operates on Woodley Avenue, adjacent to the Project. One Metro Bus stop is directly adjacent to the Project at Woodley Avenue and Index Street. Other transit operators may provide service in this area and should be consulted.
2. Impact Analysis: The Negative Declaration should analyze potential effects on Metro Bus service and identify mitigation measures or project design features as appropriate. Potential

B-1

B-2

B-3

5. Comments and Responses

11254 Gothic Avenue
Negative Declaration – Metro Comments
December 2, 2019

impacts may include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting.

↑ B-3
Cont.

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.
4. **Driveways:** Driveways accessing parking and loading at the Project site should be located away from the transit stop on Woodley Avenue, 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.
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.
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.

↑ B-4

↑ B-5

↑ B-6

↑ B-7

Transit Orientation

Considering the Project's proximity to Metro Bus Line 237, Metro would like to identify the potential synergies associated with transit-oriented development:

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

↑ B-8

↑ B-9

↓ B-10



5. Comments and Responses

11254 Gothic Avenue
Negative Declaration – Metro Comments
December 2, 2019

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

↑ B-10
Cont.

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. The City should consider requiring the installation of such features as part of the conditions of approval for the Project. 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 visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be safely and conveniently accessed.
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.
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. The A-TAP can also be used for residential projects. For more information on these programs, contact Vanessa Adlawan at AdlawanV@metro.net.

B-11

B-12

B-13

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

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachments and links:

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

5. Comments and Responses

This page intentionally left blank.



5. Comments and Responses

2. Response to Comments from Metro, dated December 2, 2019

- B-1 This comment outlines the role of Metro in transportation planning throughout Los Angeles County, including in the Project area, and provides a brief Project summary of the Project as understood by Metro.

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. However, this comment will be considered by the decision-makers of the Project. No further response is necessary.

- B-2 This comment identifies Metro Bus Line 237 as the Metro service provided in the area and states that any other transit operators that may also provide service in the Project area should be consulted.

The Site Circulation Report prepared for the Project did not identify any other transit operators in the immediate vicinity of the Project site (see Appendix H for details). The nearest transit operator aside from Metro is Metrolink, specifically the Sylmar/San Fernando station, which is approximately 2.45 miles southwest of the Project site and, as such, would not be impacted by Project implementation.

- B-3 This comment states that the IS/MND should analyze potential effects of the Project on Metro bus service (specifically construction traffic and temporary bus service rerouting) and identify mitigation or design features to reduce impacts as appropriate.

As stated in Section XVIII, upon Project buildout, public transit to the Project site would continue to be provided by Metro Local Route 237, which has two bus stops: the northbound Metro 237 on the northeast corner of Index Street and the southbound Metro 237 on the southwest corner of Index Street. The Metro Local Route 237 operates seven days a week and runs between Granada Hills and Hollywood via Woodley Avenue. According to the SUP Program EIR, approximately 50.9% of students within the City already utilize alternative transportation (school bus, walking, and bicycling). Given that 50.9% of students already utilize alternative modes of transportation and given that the proposed Project would not increase student enrollment or staff, it can be reasonably determined that, upon operation, the proposed Project is not anticipated to impact Metro's bus service when compared to existing conditions.

Furthermore, implementation of Standard Conditions SC-T-3 and SC-T-4 would ensure that impacts to transportation and public transit are reduced to a less than significant level through control measures, including implementation of a Construction Worksite Traffic Control Plan, which would be submitted 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.

- B-4 This comment pertains to the post-construction condition of the bus stop adjacent to the school. Specifically, Metro requires that the bus stop be maintained or relocated consistent with Metro operations and that the sidewalk be ADA complaint to allow disabled passengers a clear path of travel to the bus stop from the Project site.

5. Comments and Responses

The Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. Additionally, as stated in Section 3.1, Background, of this IS/MND, upgrades to the existing Kennedy HS are needed in order to bring the campus into compliance with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the MCD, consistent with the District Self-Evaluation and Transition Plan under the Americans with Disabilities Act. As such, any pedestrian and sidewalk improvements made under the proposed Project would be ADA compliant. Additionally, as stated in Standard Condition SC-PED-2 of Section XIV, Pedestrian Safety, the Project would include implementation of the OEHS Traffic and Pedestrian Safety Program, which would include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.

- B-5 This comment refers to the efficiency and safety of the driveways accessing parking and loading areas at the Project site. Specifically, this comment states that these driveways should be located away from the transit stop on Woodley Avenue so as to avoid any conflicts with on-street services and pedestrian traffic.

As stated in Standard Condition SC-PED-2 of Section XIV, Pedestrian Safety, the Project would include implementation of the OEHS Traffic and Pedestrian Safety Program, which would include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. The Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. Standard Condition SC-PED-5 would ensure that student drop-off and pick-up, bus loading areas, and parking areas are separated to allow students to enter and exit the school grounds safely.

- B-6 This comment pertains to the installation of bus stop improvements such as bus shelters, benches, signage etc. to improve the safety and comfort of transit riders.

Off-site improvements, including improvements to the existing Metro bus stop, are not within the jurisdiction of LAUSD; however, the Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. No further response is necessary.



5. Comments and Responses

- B-7 This comment provides the Metro Operations contact details and requests that any questions that LAUSD may have for Metro be brought forth at least 30 days in advance of beginning construction of the Project.

LAUSD acknowledges that Metro's contact details have been received; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.

- B-8 This comment provides a recommendation that the Project sponsor review Metro's Transit Supportive Planning Toolkit to support the reduction of VMT and provides a link to the referenced resource.

LAUSD acknowledges this recommendation; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.

- B-9 This comment pertains to Metro's support for locating commercial and residential development in proximity to transit stops to increase transit ridership and enhance transportation options. Metro requests that the Project sponsor be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the bus stop.

The proposed Project is a school modernization Project and includes improvements and upgrades to an existing school campus that is already located in proximity to public transit. As stated in Standard Condition SC-PED-2 of Section XIV, Pedestrian Safety, the Project would include implementation of the OEHS Traffic and Pedestrian Safety Program, which would include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. The Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. Standard Condition SC-PED-5 would ensure that student drop-off and pick-up, bus loading areas, and parking areas are separated to allow students to enter and exit the school grounds safely.

- B-10 This comment pertains to transit access and specifically requests that the Project address first-last mile connections to transit to encourage development that is transit-accessible with bicycle and pedestrian-oriented street design that connects transportation with housing and employment centers.

The proposed Project is a school modernization project and includes improvements and upgrades to an existing school campus that is already located in proximity to public transit. However, as stated in Standard Condition SC-PED-3 of Section XIV, Pedestrian Safety, LAUSD would coordinate with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. However, this comment will be considered by the decision-makers of the Project. No further response is necessary.

5. Comments and Responses

- B-11 This comment pertains to active transportation and specifically encourages the installation of Project features that help facilitate safe and convenient connections for pedestrians, bicyclists, and transit users from the Project site to other destinations.

As stated in Standard Condition SC-PED-2 of Section XIV, Pedestrian Safety, the Project would include implementation of the OEHS Traffic and Pedestrian Safety Program, which would include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. The Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. Standard Condition SC-PED-5 would ensure that student drop-off and pick-up, bus loading areas, and parking areas are separated to allow students to enter and exit the school grounds safely.

- B-12 This comment pertains to the incorporation of transit-oriented parking into the Project and suggests strategies to reduce automobile-orientation in design and travel demand.

Although impacts to parking supply are not identified as thresholds of significance in the State CEQA Guidelines' Environmental Checklist Form (Appendix G of the CEQA Guidelines), the proposed Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. However, this comment will be considered by the decision-makers of the Project. No further response is necessary.

- B-13 This comment provides information regarding Metro's transit pass programs.

LAUSD acknowledges that information regarding Metro's transit pass program has been received; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.



5. Comments and Responses

Comment Letter C

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-6536
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Making Conservation
a California Way of Life.*

December 3, 2019

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

RE: John F. Kennedy High School
Comprehensive Modernization Project
Mitigated Negative Declaration (MND)
SCH# 2019119001
GTS# 07-LA-2019-02911
Vic. LA – 118/ PM R8.631
Vic. LA – 405/ PM 47.41

Dear Mr. Paek:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project encompasses most of the Kennedy HS campus and consists of the comprehensive modernization of the campus, including demolition, construction, and renovation activities. The project includes demolition and removal of 22 relocatable buildings (containing 30 classrooms) and the construction of a new 20,500-square-foot building (that will provide ten new classrooms). Additionally, the following buildings would be renovated to improve seismic safety: 1) Classroom Buildings #1, #2, and #3; 2) the Library Building; 3) the Science Building; 4) the Student Store Building; 5) the Cafeteria Building; 6) the Oral Arts Building; 7) the Music Building; 8) the Shop Building; and 9) the Adult School Office. Other improvements include campus-wide infrastructure, including domestic water, fire, irrigation, gas, sewer, low voltage (e.g., fire, telephone, data), electrical and storm drainage, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, interior and exterior paint, and window treatments. The Project scope also includes the placement of interim facilities, as necessary and subject to all relevant codes and regulations, to replace facilities and associated functions lost during construction.

The nearest State facilities to the proposed project are State Route 118 (SR-118) and Interstate 405 (I-405). After reviewing the Mitigated Negative Declaration (MND), Caltrans has the following comments:

The mission of Caltrans is to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. Senate Bill 743 (2013) mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the

C-1

C-2

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

5. Comments and Responses

Mr. Paek
December 3, 2019
Page 2

Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

↑ C-2
Cont.

With regards to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project's ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies as an alternative to building excessive parking.

↑ C-3

For additional TDM options, please refer to the Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at:

↑ C-4

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

Caltrans encourages the Lead Agency to continue the reduction of vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. Such methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes.

↑ C-5

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

↑ C-6

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at carlo.ramirez@dot.ca.gov and refer to GTS# 07-LA-2019-02911.

↑ C-7

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

Cc: Scott Morgan, State Clearinghouse

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



5. Comments and Responses

3. Response to Comments from Caltrans, dated December 3, 2019

- C-1 This comment outlines a brief Project summary of the Project as understood by Caltrans and lists the nearest State facility as State Route 118 and Interstate 405.

This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. However, this comment will be considered by the decision-makers of the Project. No further response is necessary.

- C-2 This comment outlines the role of Caltrans, provides a brief description of Senate Bill 743 as the primary metric for determining the transportation impacts of a project starting July 1, 2020, and provides the online web address to the California Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts.

LAUSD acknowledges that they have received the California Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.

- C-3 This comment pertains to parking and emphasizes Caltrans' support for an overall reduction in parking wherever possible, as research suggests that there is a strong correlation between abundant parking and driving (i.e. abundant parking does not incentivize active and alternative means of transportation). This comment recommends Transportation Demand Management strategies as an alternative to building parking.

Although impacts to parking supply are not identified as thresholds of significance in the State CEQA Guidelines' Environmental Checklist Form (Appendix G of the CEQA Guidelines), the proposed Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Caltrans) to implement infrastructure improvements prior to the opening of a school. The proposed Project would include the provision of additional parking; upon demolition of portables 41 through 47, additional parking spaces would be provided in the southwest corner of the campus. As shown on Figure 7, the proposed Project would provide 394 parking spaces, more than the 309 spaces currently provided and 243 spaces required per LAUSD parking requirements. However, the proposed Project would also include improved pedestrian and bicycling facilities with implementation of Standard Conditions SC-PED-2, SC-PED-3, and SC-PED-4, thereby incentivizing alternative and active transportation. Additionally, as described in Section XVIII, the Project would adhere to Standard Conditions SC-T-2 and SC-T-3, which would guarantee that any improvements to access, circulation, and parking be done in accordance with the School Design Guidelines and in coordination with local jurisdictions.

- C-4 This comment provides the online resources to the Federal Highway Administrations Integrating Demand Management into the Transportation Planning Process.

5. Comments and Responses

LAUSD acknowledges that they have received the Federal Highway Administrations Integrating Demand Management into the Transportation Planning Process; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.

- C-5 This comment pertains to pedestrian and bicyclist safety; specifically, Caltrans encourages LAUSD to reduce pedestrian and bicyclist exposure to vehicle traffic through the construction of physically separated facilities such as bike lanes, pedestrian sidewalks, street furniture, signage, lighting etc.

As stated in Standard Condition SC-PED-2 of Section XIV, Pedestrian Safety, the Project would include implementation of the OEHS Traffic and Pedestrian Safety Program, which would include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures. The Project would implement Standard Condition SC-PED-3, which would ensure that LAUSD coordinates with the responsible traffic jurisdiction/agency (including Metro) to implement infrastructure improvements prior to the opening of a school. Standard Condition SC-PED-5 would ensure that student drop-off and pick-up, bus loading areas, and parking areas are separated to allow students to enter and exit the school grounds safely.

- C-6 This comment pertains to the required Caltrans permits needed for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles and recommends that such activities be limited to off-peak commute hours.

LAUSD acknowledges that any permits required by State and local law, including the Caltrans' permit for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles, would be obtained for the proposed Project. However, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.

- C-7 This comment provides the Caltrans contact information.

LAUSD acknowledges that Caltrans' contact details have been received; however, this comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/MND. This comment will be considered by the decision-makers of the Project. No further response is necessary.



5. Comments and Responses

Comment Letter D



Gavin Newsom
Governor

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



Kate Gordon
Director

December 3, 2019

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

Subject: John F. Kennedy High School Comprehensive Modernization Project
SCII#: 2019119001

Dear Edward Paek:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 12/2/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2019119001/2> for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

2019 DEC 18 AM 11:22
LAUSD
OFFICE OF
ENVIRONMENTAL
HEALTH & SAFETY

D1

5. Comments and Responses

This page intentionally left blank.



5. Comments and Responses

4. Response to Comments from the State Clearinghouse, Governor's Office of Planning & Research, dated December 3, 2019

D-1 This comment states that the State Clearinghouse submitted the MND to selected state agencies for review and that no state agencies had submitted comments by December 2, 2019. This comment also states that the District has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA.

The District acknowledges the State Clearinghouse's confirmation that it has complied with review requirements for draft environmental documents pursuant to CEQA. The District received one comment letter from a state agency (Caltrans) which is included in this document as Comment Letter C and is addressed under the subheading for Comment Letter C, above.

5. Comments and Responses

This page intentionally left blank.

