



November 16, 2018

Ms. Mindy Nguyen
City of Los Angeles
Department of City Planning
Central Projects Planning Division
200 North Spring Street, Room 621
Los Angeles, CA 90012

Re: Response to the LAUSD Comment Letter dated October 24, 2018.

Dear Ms. Nguyen,

This letter responds to the Los Angeles Unified School District's October 24, 2018 comment letter on the Sunset and Gordon Mixed-Use Project ("Modified Project") Draft Supplemental Environmental Impact Report ("EIR"). It should be noted that LAUSD's comment letter was submitted after the close of public comment on the Draft Supplemental EIR. The Draft Supplemental EIR was circulated for public review in August 2017 and the public review and comment period closed on October 9, 2017. The Final Supplemental EIR was published in May 2018. On August 9, 2018, the City Planning Commission certified the Supplemental EIR as complete and in compliance with the California Environmental Quality Act ("CEQA"). Nevertheless, the following responses have been prepared to address LAUSD's comments.

Before responding to LAUSD's October 24, 2018 comments, it is important to note that LAUSD previously commented on the Notice of Preparation ("NOP") for the Supplemental EIR. Specifically, LAUSD's November 16, 2015 comment letter on the NOP expressly stated that "no new mitigation is proposed at this time, however, LAUSD requests that if impacts remain after implementation of the mitigation measures, the Project applicant shall develop new feasible and appropriate measures to effectively mitigate impacts at the affected schools. Additionally, provisions shall be made to allow the schools and/or designated representative(s) to notify the Project applicant when such measures are warranted." The Supplemental EIR found that the Modified Project would result in less than significant impacts to schools with the implementation of appropriate mitigation measures aimed at ensuring pedestrian safety and unrestricted school bus access. In addition, the Modified Project would result in less than significant air quality impacts. Accordingly, no further mitigation related to potential impacts at schools was necessary. As noted above, the LAUSD did not provide a comment letter on the Draft Supplemental EIR, despite a Notice of Availability of the Draft Supplemental EIR being sent to all individuals and entities that commented on the NOP, including LAUSD.

Nevertheless, LAUSD's October 2018 comment letter asserts that the Modified Project could adversely impact two LAUSD schools: the Joseph Le Conte Middle School (Le Conte Middle School) and Richard Alonzo Community Day School (Richard Alonzo School). However, LAUSD's comment letter incorrectly

states that these two schools are located *adjacent* to the Project Site (1528-1540 North Gordon Street), and does not take into consideration any of the analysis already presented in the Supplemental EIR. In reality, neither of the two schools referenced in LAUSD's letter are located immediately adjacent to the Project Site. Joseph Le Conte Middle School is located at 1316 N. Bronson Avenue, approximately 0.2 miles southeast of the Project Site. Richard Alonzo Community Day School is located at 5755 Fountain Avenue, approximately 0.25 miles southeast of the Project Site. Both of those sites are located across Sunset Boulevard (an "Avenue I" per the City's Mobility Plan 2035, with three lanes in each direction in the Modified Project area), and are at least a half-block south of Sunset.

Air Quality

LAUSD asserts that the Modified Project's construction activities could adversely impact LAUSD students and staff, whom LAUSD states should be identified as sensitive receptors. However, in accordance with the *L.A. CEQA Thresholds Guide*, all sensitive receptors within 500 feet of the Project Site were identified in the Supplemental EIR as sensitive receptors. Le Conte Middle School and Richard Alonzo School are located more than 500 feet away from the Project Site, across Sunset Boulevard, and with multiple intervening buildings that break the line of sight between the two schools and Project Site. Furthermore, the Modified Project's haul route would not pass by any LAUSD schools, including Le Conte Middle School and Richard Alonzo School. As such, these campuses were not identified as sensitive receptors due to their distance from the Modified Project.

Additionally, the Supplemental EIR found that the Modified Project would not result in any significant air quality impacts. Specifically, the Supplemental EIR determined that the Modified Project's construction and operational air quality emissions would be less than SCAQMD's regional and localized thresholds of significance for sensitive receptors located closer to the Project Site. Accordingly, the Modified Project would have no impact on any LAUSD schools with respect to air quality and no further mitigation is required.

Noise

LAUSD asserts that the Modified Project's construction activities could adversely impact the two identified schools. For purposes of analyzing CEQA impacts, the Supplemental EIR conservatively looked at the Modified Project's total construction activities – including those that have already occurred - and found that the Modified Project's construction noise impacts would be significant and unavoidable. However, from a practical perspective, LAUSD overlooks that the major noise-generating construction components of the Modified Project have already been completed—that is, virtually all demolition and building construction has occurred. Only the additional building modifications described in the Supplemental EIR associated with the Modified Project's remain outstanding. Those additional construction activities were determined by the Supplemental EIR not to result in any new or substantially greater noise impacts than were previously identified. (Draft Supplemental EIR Section IV.F(3)(C)(1).)

In addition, the two schools are located more than 500 feet from the Project Site, and multiple buildings break the line of sight between the two schools and Project Site, including the 10 story Emerson College Building and the 14 story Netflix building. The *L.A. CEQA Thresholds Guide* recommends identifying all sensitive receptors within 500 feet of the Project Site. Due to the significant distance between the Project Site and these campuses, noise from the Modified Project would not impact Le Conte Middle School and Richard Alonzo School. In addition, the Modified Project's additional construction noise impacts would not significantly impact Emerson College, which is located across Sunset Boulevard from the Modified Project site. (Draft Supplemental EIR, pp. IV.F-29 [showing no construction noise level above ambient noise at Emerson College]; IV.F-52 [no cumulative construction noise impact at Emerson College].) Therefore, the Modified Project would have no construction noise impacts on the identified LAUSD schools that are located further from the Project Site than Emerson College, and no further mitigation is required.

Traffic/Transportation

LAUSD asserts that the Modified Project's construction activities could impact existing school bus routes. The Supplemental EIR found that the Modified Project's construction activities would have a less than significant impact to the surrounding roadways with implementation of Certified EIR Mitigation Measure MM IV.K.1-2, which details conditions for the Modified Project's haul route. In addition, Certified EIR Mitigation Measure MM IV.K.2-1 would require a Construction Parking Plan requiring construction workers to park off-street, reducing impacts from construction worker parking. Further, Certified EIR Mitigation Measure MM IV.J.3-1.1, School Bus Access, requires that the applicant contact the LAUSD Transportation Branch regarding potential impacts to school bus routes, maintain unrestricted access for school buses during construction, and comply with all provisions of the California Vehicle Code by requiring construction vehicles to stop when encountering school buses using red flashing lights.

Furthermore, the Modified Project's haul route would not pass by the aforementioned schools or any LAUSD schools. Therefore, the Modified Project would have no impact on any LAUSD schools with respect to transportation during construction, and no additional mitigation measures are required.

Finally, from a practical perspective, LAUSD again overlooks that the majority of the construction traffic-generating construction components of the Modified Project have already been completed, and only the construction of the minor changes described in the Supplemental EIR for the Modified Project will occur going forward. While the Supplemental EIR appropriately analyzes potential transportation impacts during construction based on the total amount of project construction that would be involved in development of the Modified Project, from a practical standpoint there is very limited potential for any conflicts between school buses and Modified Project construction vehicles to occur. Furthermore, any potential conflicts that could occur are appropriately mitigated by the measures set forth in the Supplemental EIR.

Pedestrian Safety

LAUSD asserts that the Modified Project's construction activities could lead to safety hazards for people walking in vicinity of the Project Site. As previously noted, Le Conte Middle School and Richard Alonzo School are located 0.2 mile and 0.25 miles southeast of the Project Site, respectively. The Modified Project would implement Certified EIR Mitigation Measures MM IV.J.3-1.1, School Bus Access, and MM IV.J.3-1.2, School Pedestrian/Traffic Safety Access, which include the mitigation measures recommended in the comment letter. For example, MM IV.J.3.1.2 requires that construction activities meet the following conditions:

- Not endanger passenger safety or delay student drop-off or pickup due to changes in traffic patterns, lane adjustments, altered bus stops, or traffic lights.
- Maintain safe and convenient pedestrian routes to LAUSD schools (LAUSD will provide School Pedestrian Route Maps upon your request).
- Maintain ongoing communication with school administration at affected schools, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
- Not haul past affected school sites, except when school is not in session. If that is infeasible, not haul during school arrival and dismissal times.
- Not staging or parking of construction-related vehicles, including worker- transport vehicles, adjacent to school sites.
- Provide crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
- Install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.
- Provide security patrols to minimize trespassing, vandalism, and short-cut attractions.

The Modified Project would also implement Certified EIR Mitigation Measure MM IV.K.1-2, which details conditions for the Modified Project's haul route and pedestrian safety.

The Modified Project's impacts to traffic/transportation and pedestrian safety would be less than significant with the implementation of the mitigation measures discussed in the Supplemental EIR. As such, no additional mitigation measures are required.

Conclusion

LAUSD's assertion that the Modified Project's impacts to Le Conte Middle School and Richard Alonzo School are not supported and do not demonstrate that air quality, noise, traffic, and pedestrian impacts are

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potentially significant. LAUSD does not provide any evidence to support their claims or call the detailed analysis in the Supplemental EIR into question. As such, no additional mitigation measures or conditions of approval are required.

Should City staff have any questions regarding any of the above responses, please do not hesitate to contact me.

Sincerely,

Parker Environmental Consultants

A handwritten signature in blue ink that reads "Shane E. Parker". The signature is written in a cursive style with a large, stylized initial 'S'.

Shane E. Parker