

# Los Angeles Unified School District

## Office of Environmental Health and Safety

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October 24, 2018

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Council and Public Services Division, Office of the City Clerk  
200 N. Spring Street, Room 395  
Los Angeles, CA, 90012

SUBJECT: PROJECT NAME: Mixed Use Project on Gordon Street  
PROJECT LOCATION: 1528-1540 North Gordon Street  
CEQA CASE NUMBER: CPC-2015-1922-GPA-VZC-HD-CUB-DB-SPR

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) to be incorporated in the Environmental Impact Report (EIR) for the subject project. Due to the fact that Le Conte MS (Joseph Le Conte MS) and Richard Alonzo Community Day School are adjacent to the proposed project site, LAUSD is concerned about the potential negative impacts of the development to our students, staff and parents traveling to and from the campus.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (air quality, noise, traffic, pedestrian safety) will occur. Since the project will have a significant impact on LAUSD schools, mitigation measures designed to help reduce or eliminate such impacts are included in this response.

### **Air Quality**

District students and school staff should be considered sensitive receptors to air pollution impacts. Construction activities for the proposed project would result in short term impacts on ambient air quality in the area resulting from equipment emissions and fugitive dust. To ensure that effective mitigation is applied to reduce construction air pollutant impacts on the schools, we ask that the following language be included as a mitigation measure for air quality impacts:

- If the proposed mitigation measures do not reduce air quality impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related air emissions at the affected schools. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

### **Noise**

Noise created by construction activities may affect the schools in proximity to the proposed project site. These construction activities include grading, earth moving, hauling, and use of heavy equipment. The California Environmental Quality Act requires that such impacts be quantified, and eliminated or reduced to a level of insignificance.

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA Leq and the

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*Our Mission: To ensure a safe and healthy environment for students to learn, teachers to teach, and employees to work.  
Our Vision: To eliminate all environmental, health, and safety risks at schools.*

interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level. To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise impacts:

- If the proposed mitigation measures do not reduce noise impacts to a level of insignificance, the project applicant shall develop new and appropriate measures to effectively mitigate construction related noise at the affected schools. Provisions shall be made to allow the school and or designated representative(s) to notify the project applicant when such measures are warranted.

### **Traffic/Transportation**

LAUSD's Transportation Branch **must be contacted** at (213) 580-2950 regarding the potential impact upon existing school bus routes. The Project Manager or designee will have to notify the LAUSD Transportation Branch of the expected start and ending dates for various portions of the project that may affect traffic within nearby school areas. To ensure that effective mitigations are employed to reduce construction and operation related transportation impacts on District sites, we ask that the following language be included in the mitigation measures for traffic impacts:

- During the construction phase, truck traffic and construction vehicles may not cause traffic delays for our transported students.
- During and after construction changed traffic patterns, lane adjustment, traffic light patterns, and altered bus stops may not affect school buses' on-time performance and passenger safety.
- Construction trucks and other vehicles are required to stop when encountering school buses using red-flashing-lights must-stop-indicators per the California Vehicle Code.
- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure vehicular safety.
- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing vehicle routes to school may be impacted.

### **Pedestrian Safety**

Construction activities that include street closures, the presence of heavy equipment and increased truck trips to haul materials on and off the project site can lead to safety hazards for people walking in the vicinity of the construction site. To ensure that effective mitigations are employed to reduce construction and operation related pedestrian safety impacts on District sites, we ask that the following language be included in the mitigation measures for pedestrian safety impacts:

- Contractors must maintain ongoing communication with LAUSD school administrators, providing sufficient notice to forewarn children and parents when existing pedestrian routes to school may be impacted.
- Contractors must maintain safe and convenient pedestrian routes to all nearby schools. The District will provide School Pedestrian Route Maps upon your request.

- Contractors must install and maintain appropriate traffic controls (signs and signals) to ensure pedestrian and vehicular safety.
- Haul routes are not to pass by any school, except when school is not in session.
- No staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on or adjacent to a school property.
- Funding for crossing guards at the contractor's expense is required when safety of children may be compromised by construction-related activities at impacted school crossings.
- Barriers and/or fencing must be installed to secure construction equipment and to minimize trespassing, vandalism, short-cut attractions, and attractive nuisances.
- Contractor's are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

The District's charge is to protect the health and safety of students and staff, and the integrity of the learning environment. The comments presented above identify potential environmental impacts related to the proposed project that must be addressed to ensure the welfare of the students attending the Le Conte MS (Joseph Le Conte MS), the Richard Alonzo Community Day School, their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-5637.

Regards,

Christine Lan  
Assistant CEQA Project Manager