

CF 19-0392 Upload to Council File

1 message

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Wed, Jun 26, 2019 at 12:46 PM

To: Clerk.CPS@lacity.org, clerk.plumcommittee@lacity.org

Cc: courtney.shum@lacity.org, william.hughen@lacity.org, Jessie.Barkley@icf.com

Hi City Clerk – Can you please upload the attached responses to comments for CF 19-0392? This relates to the SCEA document for 550 S. Shatto Pl. We are not yet scheduled for PLUM, but hope to be soon.

Thank you,

Ryan

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**Memo Responses to Comments Soul Project 06.25.19-.pdf**

766K



memorandum

date June 25, 2019

to Will Hughen

cc Courtney Shum
Ryan Leaderman
Alex Irvine
Damon Chan

from Jessie Barkley, ICF and Alan Sako, ESA

subject 550 Shatto Place /Soul Project SCEA – Response to Comment Letters

A Sustainable Communities Environmental Assessment (SCEA) (ENV-2018-3986-SCEA) was prepared by the City of Los Angeles (City) in accordance with the California Environmental Quality Act (CEQA), as amended, to evaluate the potential environmental effects associated with implementation of the proposed 550 Shatto Place/Soul Project (ZA-2018-3985-MCUP-TOC-WDI-SPR and VTT-82171-CN). The SCEA was circulated for public review from May 23, 2019 to June 24, 2019. The City has so far received four (4) comment letters during the public review period from Ryan Liu, Natalie Miller, Alex Campbell, Assistant CEQA Project Manager with the Los Angeles Unified School District (LAUSD), and Pete Cooke, with the Department of Toxic Substance Control.

Each individual comment within the letter is bracketed and numbered (i.e., 1-1, 1-2, etc.) and provided below. Responses to each individual comment raised within the letter are also addressed below. A copy of the original comment letter is attached to this Memo as Attachment 1.

Comment Letter No. 1

Ryan Liu
rliu94@yahoo.com

Comment No. 1-1

I live a couple blocks away from the proposed "Soul" project at 550 S Shatto Pl, which proposes 256 apartments and other smaller land uses with 329 parking spaces on four levels. It looks like the applicant is utilizing density bonuses, affordable housing requirements, and parking minimum waivers according to TOC Tier-4 zone regulations.

I agree that this project should be built, since it is adjacent to the Red/Purple Line station, and multiple Rapid Bus and local bus routes. It can be agreed that this project will be located in some of the most transit dense intersections in Los Angeles. This is the goal of the TOC Guidelines, the failed SB 50 bill, SB 743, and SCEA programs, to build sustainable developments near transit to cut down on VMT,



GHGs, and other environmental impacts, and to increase the supply of affordable and market rate housing.

Response No. 1-1

This comment is introductory and provides a general description of the Project, the Project location, and the TOC Guidelines, SB 375 and the SCEA. The comment is noted.

Comment No. 1-2

However, providing 329 parking spaces on four levels of underground parking is overkill, unsustainable, raises prices of leasable space, induces increases in per capita VMT and GHGs, and contributes to congestion. The City of LA will very soon this year implement SB 743 Guidelines which will use VMT to judge transportation impacts, this project is also right next to transit, and TOC Tier-4 guidelines dictate no parking minimums for this project. This project does not need to provide 329 spaces for 256 residential units. The parking can easily be cut in half or more. We know that parking lots will become obsolete with new transportation technologies, underground parking lots are expensive to build which also increases the rent of each unit, and plentiful parking encourages more VMT and GHGs. How can this project be approved with such a high level of parking? It would be such a waste considering the rich availability of public transit and personal mobility devices like scooters and shared rides in the dense and amenity rich Koreatown neighborhood. This many parking spaces totally ignores the spirit and intent of SB 743, SCEA, TOC Tier-4, and overall citywide directives to reduce VMT, car ownership, emissions, and private vehicle mode split. Why should a project that is next to quality transit be able to take density bonuses but not adhere to the intent of lower parking minimums?!?

Please consider the comments and provide input to the applicant that building all this parking will not be in their best interest as it would be impossible to retrofit when most of these spaces become obsolete.

Response No. 1-2

The commenter speculates that the parking supply is too ample; given the Project's location near transit, the Project's location within a Transit Priority Area (TPA), and potential transportation technologies that may emerge in the future.

The Project would provide 329 vehicle parking spaces on-site within four levels of subterranean parking and one level at-grade level to meeting the needs of office, commercial and residential users associated with the Project. The amount of parking provided would meet Los Angeles Municipal Code (LAMC) parking requirements, including reduced parking requirements due to the Project Site's location in a Transit Priority Area (TPA).

Contrary to the commenter's assertion that the creation of parking would lead to new vehicle miles (VMT) and related greenhouse gas (GHG) emissions, any new Project-generated traffic or GHG emissions are related to the underlying land uses (residential, office, and commercial) associated with the Project, and that providing parking in of itself does not generate new traffic on the local and regional circulation system. Furthermore, the commentator does not specify what new technological devices might emerge in the future that would further reduce parking requirements. Anticipating what the type and mode of future transportation technologies might be, would be speculative at this time, and beyond the scope of the SCEA.



Furthermore, as the Project is located within a TPA, pursuant to Public Resources Code (PRC) Section 21099 (d), aesthetic and parking impacts are not considered significant for residential, mixed-use residential, and employment center projects located on an infill site in these areas. Therefore, pursuant to PCR Section 21099 (d), parking impacts for the Project are not significant. The SCEA properly discusses, analyzes, and provides information on all environmental issues that could be impacted by the Project.

Comment Letter No. 2

Natalie Miller
nataliemillermiller@gmail.com

Comment No. 2-1

I received a letter in the mail regarding ENV-2018-3986-SCEA. What is concerning to me is this neighborhood is already incredibly difficult to park in (made even harder by the 1, 2, and 4 hour limits on many streets) and this mixed-use project will make it even more difficult to find parking. Despite the 329 planned parking spaces, the project will contain residences, office spaces, and restaurants; the parking spaces are not sufficient for the number residents, clients, and patrons Soul will attract. Residents will have guests, offices will have clients and employees, and restaurants will have patrons, including those that patronize the restaurants open until 2:00 AM. The parking spaces planned cannot possibly accommodate the number of guests expected at Soul; most will be forced to park on the street, which will create an even greater parking burden on the residents who already live in the neighborhood.

Response 2-1

The commenter speculates that the parking supply provided by the Project is insufficient.

The Project would meet LAMC parking requirements by providing 329 vehicle parking spaces for office, commercial and residential tenants and visitors. Furthermore, as the Project is located within a TPA; pursuant to Public Resources Code (PRC) Section 21099 (d), aesthetic and parking impacts are not considered significant for residential, mixed-use residential, and employment center projects located on an infill site in these areas. Therefore, pursuant to PCR Section 21099 (d), parking impacts for the Project are not significant. The SCEA properly discusses, analyzes, and provides information on all environmental issues that could be impacted by the Project.

Comment No. 2-2

Despite the parking issues, the concern for noise while building the structure, including the demolition of the already existing buildings is also an issue. Right now, a mixed-use structure is being built on Vermont and 6th (a couple blocks away from me), and the honking from the large crane being used is as loud as a firetruck, which sounds multiple times a day starting before 7:00 AM until after 6:00 PM, at least five days a week, and sometimes on Saturdays. This noise pollution is burdensome and difficult to do business in, as I am an independent contractor and do much of my work from home.

If there is another large mixed-use building being built just a block away from my apartment, the coinciding noise from both cranes will be unbearable. Residents need a functioning quality of life and peace in our neighborhood, and this new project will threaten both. I do not see a benefit for the



community with another mixed-use structure, as it will make street parking in the community harder to find, requiring a longer than already required, multi-block walk from parking spaces, and introduce more noise pollution from construction as well as loud, drunk patrons walking back to their cars during the early hours of the morning. I would like the quality of life from the current residents of the neighborhood to be taken into consideration by Mr. Bertoni, yourself, and the Board of Directors on my neighborhood council. My greatest concern is increasing lack of street parking, and increased noise pollution, greatly disturbing the quality of life for the current residents.

Response No. 2-2

The commenter raises concerns related to the potential noise impacts related to the construction and operation of the Project.

As discussed in the SCEA starting on Page 5-17 in Section 5.3, *Air Quality* and starting on Page 5-157 in Section 5.15, *Noise*, a comprehensive analysis of potential noise and air quality impacts to the nearby noise-sensitive land uses resulting from construction and operation of the Project and the Project in conjunction with related nearby projects, was conducted as part of the SCEA.

The SCEA includes a number of Project Design Features (PDF) and Mitigation Measures (MM) that would ensure a less than significant impact with respect to construction and operational noise impacts. Specifically, related to construction, PDF NOISE-1 limits construction and demolition of the Project to daytime hours as specified in the LAMC and prohibits construction during sensitive nighttime hours. PDF NOISE-2 specifies that the Project would not include or allow the use of impact pile drivers. PDF AIR-1 requires that cranes used to construct the Project must be electric powered to minimize emissions. This would also have a co-benefit of reducing noise. Electric compressors related to crane operations are significantly quieter than diesel or gasoline engine powered compressors. The use of electric powered equipment is typically quieter than diesel, and hydraulic powered equipment is quieter than pneumatic power.¹

In addition, MM NOISE-1 requires that the Project meet a noise performance standard using a variety of noise reducing strategies including the use of noise control devices on construction equipment, use of noise barriers, and the staging and timing of construction and demolition activities to minimize or avoid operating multiple heavy pieces of equipment near sensitive noise receptors along the eastern boundary of the Project Site. In addition, MM NOISE-2 requires the designation of a construction relations officer to serve as a liaison with surrounding residents and property owners that is responsible for responding to any concerns regarding construction noise and vibration. With implementation of PDF NOISE-1, PDF NOISE-2, MM NOISE -1 and MM NOISE-2, construction noise impacts would be below the City's significance threshold.

With regard to potential operational impacts related to patrons utilizing the commercial uses, parking for the commercial uses would be within the subterranean parking garage, where noise impacts would be minimized. As discussed starting on Page 5-175, the SCEA analyzed the potential noise impacts resulting from the operation of the four levels of subterranean parking structure and one at-grade level on nearby noise sensitive receptors. As determined in the SCEA, potential noise impacts from the parking garage

¹ Federal Highway Administration, Construction Noise Handbook, 7.0 Mitigation of Construction Noise, updated June 28, 2017. https://www.fhwa.dot.gov/ENVIRONMENT/noise/construction_noise/handbook/handbook07.cfm



were determined to be less than significant. Additionally, the noise analysis concluded that commercial uses in the existing repurposed church building associated with the patio seating fronting 6th Street would not exceed noise significance thresholds. Noise impacts from an on-site emergency generator, which would only be used to provide emergency power and during occasional maintenance and testing, was also analyzed at nearby noise sensitive receptors. Implementation of mitigation measure MM NOISE-4, which requires a noise enclosure or equivalent noise attenuation measure for the emergency generator, would mitigate noise impacts from the emergency generator to less than significant.

The above comment provides no substantial evidence supporting the need for different analysis or conclusions or mitigation measures included in the SCEA. Therefore, there is no basis for additional analysis and no response is further required as the comment does not raise any new significant environmental issue or address the adequacy of the environmental analysis included in the SCEA.

Comment No. 2-3

Please let me know what I can do or who I can contact regarding my concerns and what steps I can take moving forward. Thank you for taking the time to read my email. I look forward to hearing from you soon.

Response No. 2-3

The comment does not raise issues specific to the environmental analysis in the SCEA. However, the comment is noted and will be provided to the decision makers for their consideration.

Comment Letter No. 3

Alex Campbell, Assistant CEQA Project Manager
Los Angeles Unified School District (LAUSD)

Comment 3-1

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the project located at 550, 530, 522 South Shatto Place; 3119 West 6th Street.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (air quality, traffic, pedestrian safety) will occur. Due to the fact that Young Oak Kim Academy is located across the street from 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 referenced campuses. 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.

Response 3-1

The comment is noted. The SCEA included a comprehensive analysis of potential air quality, safety, hazards, noise and traffic impacts resulting from construction and operation of the Project on nearby



sensitive land uses including Young Oak Kim Academy referenced by the commenter. As a result of the thorough analysis contained within the SCEA, in addition to complying with federal, state and local regulations, the Project has incorporated numerous procedures and measures within Project Design Features (PDF)s and Mitigation Measures (MM). These measures are designed to ensure that any environmental impacts, including to Young Oak Kim Academy students and staff, would be less than significant. Specific comments raised in this letter are provided under individual responses below.

Comment 3-2

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.

Response 3-2

As discussed and analyzed in Section 5.3, *Air Quality*, starting on Page 5-17, Young Oak Kim Academy was identified as a sensitive receptor and was given special consideration in the SCEA as part of the analysis of potential air quality impacts. The Project would comply with applicable air quality regulations, such as compliance with the South Coast Air Quality Management District (SCAQMD) Rule 403 to control fugitive dust emissions and would also include provisions within PDF AIR-1 that would reduce air quality impacts on sensitive receptors, including Young Oak Kim Academy.

Specially, PDF AIR-1 includes a list of required measures to reduce construction-related impacts, such as requiring that any cranes and welders to be electric-powered; forklifts to be natural gas-powered; off-road diesel-powered equipment must meet the Tier 4 final off-road emissions standards within the Los Angeles region; the Project must utilize low-VOC coatings where commercially available during construction activities; and trucks and other vehicles in loading and unloading queues must be parked with engines off to reduce vehicle emissions during construction activities. The Project would follow applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The Project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that requires construction contractors to phase-in cleaner construction equipment. The Project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the renovation and construction activities. Furthermore, emissions from construction equipment associated with the Project and operation of the Project are expected to result in less than significant health risk impacts at nearby sensitive receptors, including Young Oak Kim Academy.



With respect to localized air quality impacts, as shown in SCEA Table 5-7 and Table 5-8, the Project's maximum localized construction and operational emissions would not exceed the thresholds for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, the Project's localized construction impacts would be less than significant at nearby sensitive receptors, including Young Oak Kim Academy, and mitigation measures are not required.

In sum, the Project would result in less than significant air quality impacts to nearby sensitive receptors, including Young Oak Kim Academy, accounting for regulatory compliance with applicable SCAQMD and CARB rules and regulations, and accounting for the feasible project design features in PDF AIR-1 that would further minimize air quality emissions and associated air quality impacts. Therefore, additional Mitigation Measures are not required for the Project to result in less than significant impacts at Young Oak Kim Academy.

Therefore, there is no basis for additional analysis and no response is further required as the comment does not raise any new significant environmental issue or address the adequacy of the environmental analysis included in the SCEA.

Comment 3-3

Hazards Section

The Subsurface Investigation Report, dated September 20, 2018 and completed by Hazard Management Consulting, Inc., reported hydrocarbon contamination below 20 feet below ground surface that is likely associated with an offsite fuel release. LAUSD believes the offsite fuel release contaminated the nearby groundwater and capillary fringe thereby causing hydrocarbon contamination at adjacent properties. The excavation for the underground parking will likely encounter this contamination and there is potential exposure hazard to the students and staff at the Young Oaks Academy during construction. LAUSD recommends that SCAQMD Rule 1166 be strictly followed to prevent any hydrocarbon exposure during the excavation, soil handling and soil transport activities during construction. Furthermore, plans should be completed for notifications of complaints and to shut down construction if there are complaints at the LAUSD school facility.

Response 3-3

The commenter is correct in identifying that the Subsurface Investigation Report, dated September 20, 2018 prepared for the Project, indicated that the Project Site contains likely contains contaminated soils below 20 feet bgs that would be removed during excavation. As described in detail below, the SCEA includes the incorporation of Mitigation Measures MM HAZ-1 and MM HAZ-2 which would ensure that the transport and disposal of the potentially contaminated soils and groundwater removed from the Project Site would not create a significant hazard to Young Oaks Academy student or staff.

More specifically as discussed in Section 5.9, *Hazards and Hazardous Materials*, of the SCEA, Mitigation Measure MM HAZ-1 would require that Project construction activities comply with SCAQMD Rule 1166 in order to control and minimize the risk associated with excavating, transporting and disposing of potentially impacted or impacted soils that may be encountered at the Project Site. MM HAZ-1 also includes the preparation of an approved Soil Management Plan (SMP) that would provide



guidance to contractors for appropriate screening, and management of potentially impacted or impacted soils that may be encountered during grading and excavation activities.

MM HAZ-1 is listed below for reference:

MM HAZ-1: A Site Specific Soil Mitigation Plan (SMP) will be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. These procedures will include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures.

The SMP will also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site must comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material will extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil must be wetted by spraying with dust inhibitors.
- The trucks or trailers must be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) must be cleaned off prior to the trucks leaving the excavation location and leaving the disposal site before returning to the Project Site.

In addition, to minimize potential hazards associated with potentially impacted contaminated groundwater during construction, the Project would include MM HAZ-2. MM HAZ-2 would include the development of a Groundwater Management Plan (GWMP), which would include training and protocol procedures for contractors to avoid contact with groundwater and minimize exposure to adjacent uses. MM HAZ-2 is listed below for reference:

MM HAZ-2: A Groundwater Management Plan (GWMP) will be prepared that includes training and protocol procedures to contractors for avoiding contact with groundwater during excavation and construction of the Project and appropriate disposal protocols of contaminated groundwater. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR 1910.120 as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact.



Construction of the Project would also involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils typically used in construction. However, all such substances and materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to Young Oaks Academy student or staff.

In addition, if any grading were to occur during the rainy season (October 1st to April 14th), the Project would prepare a Wet Weather Erosion Control Plan (WWECP) which is required pursuant to the City of Los Angeles Board of Public Works (BPW). The WWECP addresses water pollution control from grading activities during the wet weather season by specifying the use of appropriate temporary erosion and sediment control best management practices.

Per the commenter's request regarding notifications of complaints and to shut down construction if there are complaints at the LAUSD school facility, the Project also includes MM NOISE-2 which requires that a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. While it is not appropriate to shutdown construction when there has been no substantiation to the validity, substance, or seriousness of the complaint at the LAUSD school facility, as suggested by the commenter, mitigation measure MM NOISE-2 does require a construction relations officer to serve as a liaison. The Project's mitigation measures are required and the City would enforce them. Nevertheless, in light of the commenter's comments, MM NOISE-2 shall be modified as follows:

MM NOISE-2: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction ~~noise and vibration~~. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that include permitted construction days and hours. In addition, no less than 30 days prior to the start of construction, the Applicant shall also meet with the principal, or other designated representatives, of Young Oaks Academy to discuss Project construction, the Construction Management Plan, and provide information regarding the construction relations officer who would serve as the liaison to the community.

As such, compliance with applicable regulations and incorporation of mitigation measures described above, potential risks of exposure to hazardous materials to Young Oaks Academy students and staff due to Project construction would be less than significant. With the revisions to MM NOISE-2, no different analysis or conclusions or mitigation measures are necessary in the SCEA.

Comment 3-4

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.

Response 3-4

As described and analyzed in Section 5.17, *Transportation*, Project construction would not create a significant transportation or traffic impact for bicyclists, pedestrians, or motorists. Construction activities would be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. The curb lane on Shatto Place, which provides on-street parking, could be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. However, no staging or parking of construction-related vehicles, including worker-transport vehicles, will occur on Young Oaks Academy property or immediately adjacent to the Young Oaks Academy. Per California Vehicle Code



22454, any driver including drivers of construction trucks and other vehicles, would be required to stop when encountering school buses using red-flashing-lights must-stop-indicators.

To further reduce any potential impacts, the SCEA includes a detailed Construction Management Plan (MM TRAF-1) that includes numerous measures to ensure safety for pedestrians, bicyclists and vehicles during Project construction, including specific measures to reduce any impacts that may affect the Young Oak Kim Academy. MM TRAF-1 is listed below for reference.

MM TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Requiring workers and construction trucks to generally travel outside of the peak hours;
- Prohibition of construction worker parking on nearby residential streets;
- Temporary traffic control during all construction activities encroaching on public rights-of-way to improve traffic flow and safety on public roadways;
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers as appropriate;
- Scheduling of construction-related deliveries so as to generally occur outside the commuter peak hours; and
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.

Public Services (Construction Activity Near Schools)

MM TRAF-2: There shall be no staging or parking of construction vehicles, including vehicles to transport workers on any of the streets adjacent to the school.

Public Services (Schools Affected by Haul Route)

MM TRAF-3: LADBS shall assign specific haul route hours of operation based upon Young Oak Kim Academy's hours of operation.

MM TRAF-4: Haul route scheduling shall be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past the school during periods when school is in session especially when students are arriving or departing from the campus.

MM TRAF-5: The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times. Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility. Covered walkways shall be provided where pedestrians are exposed to potential injury



from falling objects. Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

In addition, to prevent any access to the construction site and ensure safety and minimize cut-through attractions, the Project includes MM PS-1 which is referenced below:

MM PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

The Project also includes revised MM NOISE-2 which requires that a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The revised measure also requires a pre-construction meeting with the Young Oaks Academy. MM-NOISE-2 is referenced below.

MM NOISE-2: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that include permitted construction days and hours. In addition, no less than 30 days prior to the start of construction, the Applicant shall also meet with the principal, or other designated representatives, of Young Oaks Academy to discuss Project construction, the Construction Management Plan, and provide information regarding the construction relations officer who would serve as the liaison to the community. The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that include permitted construction days and hours.

In summary, the SCEA includes multiple measures within the above referenced project design features and Mitigation Measures to minimize any potential impacts to the students and staff. The above comment provides no substantial evidence supporting the need for different analysis or conclusions or mitigation measures included in the SCEA.

Comment 3-5

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 Young Oak Kim Academy 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) 241-4210.

Response 3-5



As described in the responses above, the SCEA included a comprehensive analysis of potential air quality, safety, hazards, noise, and traffic impacts to nearby sensitive land uses including Young Oak Kim Academy resulting from construction and operation of the Project. Compliance with state and local regulations and incorporation of Project Design Features and Mitigation Measures described above would ensure any impacts would be less than significant.

Comment Letter No. 4

Pete Cooke, Site Mitigation and Restoration Program- Chatsworth Office
Department of Toxic Substance Control

Comment 4-1

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project. Based on the review of the document, the DTSC comments are as follows:

Response 4-1

This comment is introductory in nature. The comment is noted.

Comment 4-2

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

Response 4-2

As discussed and analyzed in Section 5.9, *Hazard and Hazardous Materials* of the SCEA, a *Phase I Environmental Site Assessment* (Phase I ESA) was prepared for the Project Site in December 5, 2017. The Phase I ESA, which is included in Appendix G of the SCEA, was conducted to evaluate the presence of known or suspected hazardous materials or waste at the Project Site.

As part of the Phase I ESA, a search was conducted for available federal, State, and local environmental database records for the Project Site. According to the review of environmental database records, the Project Site is not listed on any regulatory database and historic uses on the Project Site have not resulted in any release of hazardous wastes/substances at the Project Site.

The Project Site was historically used for residential, church and school uses. As the majority of the onsite structures were built before the 1978 federal regulations banning the use of asbestos containing building materials (ACBMs) were enacted, there is a potential for the presence of ACBMs in the on-site buildings. Therefore, prior to the issuance of any permit for the demolition of the existing buildings or the alteration of the existing church building to be retained, a comprehensive ACBMs survey of the buildings must be performed. California Health and Safety Code Section 19827.5, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. If ACBMs are found to be present on the Project Site, they would be



abated in compliance with the SCAQMD Rule 1403 and other applicable State and federal rules and regulations. With regulatory compliance, the risk related to any existing ACBMs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to ACBMs.

As the existing onsite buildings were constructed prior to the 1978 federal regulations banning the use of lead-based paints (LBPs), there is potential for the presence of LBPs in the onsite buildings, which could pose a significant hazard to construction workers or the public. Cal/OSHA's Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities.

Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to CalOSHA regulations. With regulatory compliance, the risk related to any existing LBPs at the Project Site would be reduced to acceptable levels, and the Project would result in no impact with regard to LBPs.

Typical of many construction projects, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. However, all materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers.

Comment 4-3

- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.

Response 4-3

While the Phase I ESA did not identify any recognized environmental conditions (RECs) associated with past and present land uses on the Project Site, it did identify a leaking underground storage tank (LUST) case at a former gasoline station west of the Project Site. The Phase I ESA concluded that groundwater beneath the Project Site may be impacted as a result of the LUST, which has since been closed by the Regional Water Quality Control Board (RWQCB). Subsequently a *Subsurface Investigation Report, 3119 West 6th Street, Los Angeles, California* (Subsurface Investigation Report) was prepared by Hazard Management Consulting (HMC), on September 20, 2018 (Appendix G of the SCEA). The *Subsurface Investigation Report* indicated that the Project Site contains likely contains contaminated soils below 20 feet bgs that would be removed during excavation.

To minimize hazards, the SCEA includes the incorporation of Mitigation Measures MM HAZ-1 and MM HAZ-2 which would ensure that the potentially contaminated soils and groundwater removed from the Project Site would not create a significant hazard the public or environment.



More specifically as discussed in Section 5.9, *Hazards and Hazardous Materials*, of the SCEA, Mitigation Measure MM HAZ-1 would require the preparation of an approved Soil Management Plan (SMP) that would provide guidance to contractors for appropriate screening, and management of potentially impacted or impacted soils that may be encountered during grading and excavation activities.

MM HAZ-1 is listed below for reference:

MM HAZ-1: A Site Specific Soil Mitigation Plan (SMP) will be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. These procedures will include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures.

The SMP will also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site must comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material will extend above the sides or rear of the truck or trailer.
- Prior to covering/tarpping, loaded impacted soil must be wetted by spraying with dust inhibitors.
- The trucks or trailers must be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) must be cleaned off prior to the trucks leaving the excavation location and leaving the disposal site before returning to the Project Site.

In addition, to minimize potential hazards associated with potentially impacted contaminated groundwater during construction, the Project would include MM HAZ-2. MM HAZ-2 would include the development of a Groundwater Management Plan (GWMP), which would include training and protocol procedures for contractors to avoid contact with groundwater and minimize exposure to adjacent uses. MM HAZ-2 is listed below for reference:

MM HAZ-2: A Groundwater Management Plan (GWMP) will be prepared that includes training and protocol procedures to contractors for avoiding contact with groundwater during excavation and construction of the Project and appropriate disposal protocols of contaminated groundwater. The GWMP will include a requirement for development and implementation of a safety plan to be prepared prior to commencement of construction consistent with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR 1910.120 as well as management of groundwater produced through temporary dewatering activities. The safety plan will include necessary training, operating and emergency response procedures, and reporting requirements to regulate all activities that bring workers in contact with potentially contaminated groundwater. In the unlikely event that groundwater contamination occurs, the GWMP will include remedial efforts that may include batch extraction of groundwater using an on-site



dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact.

Based on testing conducted as part of the *Subsurface Investigation Report* there is a low likelihood of a health risk to future employees and visitors to the proposed restaurant uses on the Project Site as a result of vapor intrusion. Even so, the Project includes MM HAZ-3 to reduce any potential health risks related to vapor intrusion associated with the Project's repurposing of the former church building. MM HAZ-3 requires that all concrete cuts and utility penetrations into the former church building's foundation/slab that may occur due to the installation of subsurface piping for future water, sewer and other utilities be sealed to add an additional measure of protection against potential vapor intrusion.

With compliance with applicable regulations and incorporation of MM HAZ-1, MM HAZ-2, and MM HAZ-3, the SCEA determined that impacts to human health would be less than significant.

Comment 4-4

- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

Response 4-4

As mentioned in Response 4-3, the Project includes Mitigation Measure MM HAZ-1, which includes features required to comply with the South Coast Air Quality Management District's (SCAQMD) Rule 1166 (Volatile Organic Compound Emissions from Decontamination of Soil) which requires that an approved mitigation plan be obtained from SCAQMD prior to commencing any of the following activities:

- 1) The excavation of an underground storage tank or piping which has stored volatile organic compounds (VOCs).
- 2) The excavation or grading of soil containing VOC material including gasoline, diesel, crude oil, lubricant, waste oil, adhesive, paint, stain, solvent, resin, monomer, and/or any other material containing VOCs.
- 3) The handling or storage of VOC-contaminated soil [soil which registers >50 parts per million (ppm) or greater using an organic vapor analyzer (OVA) calibrated with hexane] at or from an excavation or grading site.
- 4) The treatment of VOC-contaminated soil at a facility

SCAQMD Rule 1166 requires ongoing monitoring for contaminated soils, ongoing testing of soils, the segregation and covering of contaminated soils, and appropriate removal and disposal of contaminated soils. A SMP would be prepared and approved by the SCAQMD prior to commencing soil excavation. Soil monitoring would be completed during excavation in accordance with SCAQMD's Rule 1166 and the SMP.



Comment 4-5

- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Response 4-5

As discussed in Responses # 4-3 and 4-4, the Project would comply with SCAQMD Rule 1166 that requires ongoing monitoring for VOC contaminated soils, ongoing testing of soils, the segregation and covering of VOC contaminated soils, and appropriate removal and disposal of VOC contaminated soils. A SMP would be prepared and approved by the SCAQMD prior to commencing soil excavation. The SMP would provide safety guidance to contractors on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The SMP includes protocols for ongoing testing and appropriate separation and disposal of VOC contaminated soils. Soil monitoring would be completed during excavation in accordance with SCAQMD's Rule 1166 and the SMP.

Comment 4-6

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Response 4-6

The commenter provides information on the PEA and VCP programs and contact information. The comment is noted.

Attachment 1



William Huguen <william.huguen@lacity.org>

ENV-2018-3986-SCEA, Comments

Ryan L <rliu94@yahoo.com>
To: william.huguen@lacity.org

Tue, May 28, 2019 at 11:26 PM

Hello LA City Planning,

I live a couple blocks away from the proposed "Soul" project at 550 S Shatto Pl, which proposes 256 apartments and other smaller land uses with 329 parking spaces on four levels. It looks like the applicant is utilizing density bonuses, affordable housing requirements, and parking minimum waivers according to TOC Tier-4 zone regulations.

I agree that this project should be built, since it is adjacent to the Red/Purple Line station, and multiple Rapid Bus and local bus routes. It can be agreed that this project will be located in some of the most transit dense intersections in Los Angeles. This is the goal of the TOC Guidelines, the failed SB 50 bill, SB 743, and SCEA programs, to build sustainable developments near transit to cut down on VMT, GHGs, and other environmental impacts, and to increase the supply of affordable and market rate housing.

However, providing 329 parking spaces on four levels of underground parking is overkill, unsustainable, raises prices of leasable space, induces increases in per capita VMT and GHGs, and contributes to congestion. The City of LA will very soon this year implement SB 743 Guidelines which will use VMT to judge transportation impacts, this project is also right next to transit, and TOC Tier-4 guidelines dictate no parking minimums for this project. This project does not need to provide 329 spaces for 256 residential units. The parking can easily be cut in half or more. We know that parking lots will become obsolete with new transportation technologies, underground parking lots are expensive to build which also increases the rent of each unit, and plentiful parking encourages more VMT and GHGs. How can this project be approved with such a high level of parking? It would be such a waste considering the rich availability of public transit and personal mobility devices like scooters and shared rides in the dense and amenity rich Koreatown neighborhood. This many parking spaces totally ignores the spirit and intent of SB 743, SCEA, TOC Tier-4, and overall citywide directives to reduce VMT, car ownership, emissions, and private vehicle mode split. Why should a project that is next to quality transit be able to take density bonuses but not adhere to the intent of lower parking minimums?!?

Please consider the comments and provide input to the applicant that building all this parking will not be in their best interest as it would be impossible to retrofit when most of these spaces become obsolete.

Thanks,

Ryan Liu



William Hughen <william.hughen@lacity.org>

RE: ENV-2018-3986-SCEA

Natalie Miller <nataliemillermiller@gmail.com>

Tue, May 28, 2019 at 1:21 PM

To: william.hughen@lacity.org

Cc: president@greaterwilshire.org

Dear Mr. Hughen,

I received a letter in the mail regarding ENV-2018-3986-SCEA. What is concerning to me is this neighborhood is already incredibly difficult to park in (made even harder by the 1, 2, and 4 hour limits on many streets) and this mixed-use project will make it even more difficult to find parking. Despite the 329 planned parking spaces, the project will contain residences, office spaces, and restaurants; the parking spaces are not sufficient for the number residents, clients, and patrons Soul will attract. Residents will have guests, offices will have clients and employees, and restaurants will have patrons, including those that patronize the restaurants open until 2:00 AM. The parking spaces planned cannot possibly accommodate the number of guests expected at Soul; most will be forced to park on the street, which will create an even greater parking burden on the residents who already live in the neighborhood.

Despite the parking issues, the concern for noise while building the structure, including the demolition of the already existing buildings is also an issue. Right now, a mixed-use structure is being built on Vermont and 6th (a couple blocks away from me), and the honking from the large crane being used is as loud as a firetruck, which sounds multiple times a day starting before 7:00 AM until after 6:00 PM, at least five days a week, and sometimes on Saturdays. This noise pollution is burdensome and difficult to do business in, as I am an independent contractor and do much of my work from home.

If there is another large mixed-use building being built just a block away from my apartment, the coinciding noise from both cranes will be unbearable. Residents need a functioning quality of life and peace in our neighborhood, and this new project will threaten both. I do not see a benefit for the community with another mixed-use structure, as it will make street parking in the community harder to find, requiring a longer than already required, multi-block walk from parking spaces, and introduce more noise pollution from construction as well as loud, drunk patrons walking back to their cars during the early hours of the morning.

I would like the quality of life from the current residents of the neighborhood to be taken into consideration by Mr. Bertoni, yourself, and the Board of Directors on my neighborhood council. My greatest concern is increasing lack of street parking, and increased noise pollution, greatly disturbing the quality of life for the current residents.

Please let me know what I can do or who I can contact regarding my concerns and what steps I can take moving forward. Thank you for taking the time to read my email. I look forward to hearing from you soon.

Sincerely,

Natalie Miller

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Director, Environmental Health and Safety

JENNIFER FLORES
Deputy Director, Environmental Health and Safety

June 24, 2019

Will Huguen
City of Los Angeles, Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA, 90012

SUBJECT: PROJECT NAME: Soul
PROJECT LOCATION: 550, 530, 522 South Shatto Place; 3119 West 6th Street
CASE NUMBER: ENV-2018-3986-SCEA

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the project located at 550, 530, 522 South Shatto Place; 3119 West 6th Street.

Based on the extent/location of the proposed development, it is our opinion that significant environmental impacts on the surrounding community (air quality, traffic, pedestrian safety) will occur. Due to the fact that Young Oak Kim Academy is located across the street from 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 referenced campuses. 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.

Hazards Section

The Subsurface Investigation Report, dated September 20, 2018 and completed by Hazard Management Consulting, Inc., reported hydrocarbon contamination below 20 feet below ground surface that is likely associated with an offsite fuel release. LAUSD believes the offsite fuel release contaminated the nearby groundwater and capillary fringe thereby causing hydrocarbon contamination at adjacent properties. The excavation for the underground parking will likely encounter this contamination and there is potential exposure hazard to the students and staff at the Young Oaks Academy during construction. LAUSD recommends that SCAQMD Rule 1166 be strictly followed to prevent any hydrocarbon exposure during the excavation, soil handling and soil transport activities during construction. Furthermore, plans should be completed for notifications of complaints and to shut down construction if there are complaints at the LAUSD school facility.

333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 • Telephone (213) 241-3199 • Fax (213) 241-6816

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.

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 Young Oak Kim Academy 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) 241-4210.

Regards,

A handwritten signature in blue ink, appearing to read 'Alex Campbell', is positioned above the typed name.

Alex Campbell
Assistant CEQA Project Manager



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311



Gavin Newsom
Governor

June 10, 2019

Will Huguen
City of Los Angeles
Department of City Planning
200 N. Spring Street, Room 763
Los Angeles, CA 90012

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL DOCUMENT FOR THE SOUL PROJECT (PROJECT)

Dear Mr. Huguen:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.
- 2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment.
- 3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.
- 4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

Mr. Will Huguen
June 10, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pete Cooke', with a long horizontal flourish extending to the right.

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806