

# Los Angeles Unified School District

## Office of Environmental Health and Safety

JOHN E. DEASY, Ph.D.  
Superintendent of Schools

ENRIQUE G. BOULL'T  
Interim Chief Operating Officer

JOHN STERRITT  
Director, Environmental Health and Safety

## NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

**TO:** Agencies, Organizations, Property Owners, and Interested Parties

**SUBJECT:** Notice of Preparation of an Draft Environmental Impact Report

NOTICE IS HEREBY GIVEN that the Los Angeles Unified School District (District or LAUSD), as lead agency for the project, will prepare a Draft Environmental Impact Report (DEIR) for the Districtwide Redevelopment Program pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC], Division 13, Section 21000 et seq. [CEQA Statute] and the California Code of Regulations [CCR], Title 14, Division 6, Chapter 3, Section 15000 et seq. [CEQA Guidelines]). The District needs to know the views of agencies, organizations, property owners, and interested parties as to the scope and content of the environmental impact report.

In compliance with CEQA Guidelines Section 15060(d) and 15082, the District will not be preparing an initial study and will begin work directly on the DEIR.

**PROJECT TITLE:** Districtwide Redevelopment Program

**PROJECT LOCATION:** The proposed redevelopment program covers schools within the entire District which has the most students of any public school system in California and is the second-largest public school district in the United States. The District's 710 square miles includes most of the County of Los Angeles, with all or portions of 31 cities as well as unincorporated areas.

**PROJECT DESCRIPTION:** In 2008, voters in Los Angeles County passed Measure Q as a funding mechanism to continue the LAUSD's various programs to provide world-class educational facilities. This measure enables the District to construct classroom seats needed to implement class size reductions according to the Quality Education Investment Act (QEIA) and to help accommodate future enrollment growth resulting from increased graduation rates and the projected reversal of the declining enrollment anticipated around 2015. The measure will also help the District satisfy court-mandated compliance requirements, such as the Williams Settlement and Chanda Smith Consent Decree, among others.

Under Measure Q, and in association with other ongoing LAUSD facilities programs, the District is proposing repair, upgrade, and modernization projects at hundreds of neighborhood schools throughout the District. Not every project will be undertaken at every campus, and some campuses may not undergo any repairs, upgrades, or modernization. Each category of project will be carried out at schools found to have the greatest need, as determined by the Strategic Execution Plan adopted by the LAUSD Board of Education.

The program may include, but is not limited to, the following types of campus-specific projects:

- Safety, Earthquake, Emergency, Fire-Prevention (upgrade fire/life safety systems; replace pipes and plumbing system, air conditioning and ventilation filtration systems, etc.)
- Lead, Asbestos, and Other Code Compliance
- Special Education Career Transition Centers (renovate existing facilities)
- Library Upgrades (improvement and equipment for libraries and media centers)
- School Repair and Expansion (provision of furnishings and equipment, reopening closed schools, exterior repair and paint, repair and replace lockers, etc.)
- Computer and Communications (modernize classrooms, upgrades to telecommunications and video-conferencing systems, new hardware and software, etc.)
- Sustainable Schools (improve energy efficiency, water efficiency, and renewable energy)
- Adult and Career Education (provide facilities necessary for career training)
- Early Childhood Education (renovate, repair, and create early education centers)
- Food Service (replace equipment, upgrade secondary school cafeterias, replace refrigeration systems, etc.)
- Temporary Classrooms (replace, upgrade, or relocate portable classrooms)

**POTENTIAL ENVIRONMENTAL EFFECTS:** In accordance with Section 15082 of the State CEQA Guidelines, the District has prepared this Notice of Preparation to provide agencies, organizations, property owners, and interested parties with information describing the proposal and its potential environmental effects. Environmental factors that will be analyzed in the DEIR are:

- |                            |                                      |                                 |
|----------------------------|--------------------------------------|---------------------------------|
| • Aesthetics               | • Agriculture and Forestry Resources | • Air Quality                   |
| • Biological Resources     | • Cultural Resources                 | • Geology and Soils             |
| • Greenhouse Gas Emissions | • Hazards and Hazardous Materials    | • Hydrology and Water Quality   |
| • Land Use and Planning    | • Mineral Resources                  | • Noise                         |
| • Pedestrian Safety        | • Population and Housing             | • Public Services               |
| • Recreation               | • Transportation and Traffic         | • Utilities and Service Systems |

**PUBLIC REVIEW PERIOD:** Pursuant to California Code of Regulations, Title 14, Section 15082(b), the District is soliciting comments regarding the environmental impacts of the proposed project. The District will accept written comments between **November 18, 2013, and December 18, 2013.**

**PUBLIC COMMENTS:** Please indicate a contact person and send your comments to:

Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 28<sup>th</sup> Floor  
Los Angeles, CA 90017  
Attention: John Anderson

Comments can also be sent by FAX to (213) 241-4119, or by e-mail to [john.r.anderson@lausd.net](mailto:john.r.anderson@lausd.net). Please include "Districtwide Redevelopment Program" in the subject line.

# Los Angeles Unified School District

## Office of Environmental Health and Safety

JOHN E. DEASY, Ph.D.  
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Director, Environmental Health and Safety

## AVISO DE PREPARACIÓN DE UN REPORTE DE IMPACTO AL MEDIO AMBIENTE

**PARA:** Agencias, Organizaciones, y Partidos Interesados

**SUBJECT:** Aviso de Preparación del Reporte de Impacto al Medio Ambiente

SE DA AVISO POR LA PRESENTE que El Distrito Escolar Unificado de Los Ángeles (LAUSD, por sus siglas en inglés), como la agencia encargada del proyecto, preparará un Reporte de Impacto al Medio Ambiente (EIR, por sus siglas en inglés) para el Programa de Reurbanización del Distrito en cumplimiento con el Acta de Calidad del Medio Ambiente de California (CEQA, por sus siglas en inglés)(Código de Recursos Públicos de California [PRC, por sus siglas en inglés], División 13, Sección 21000 y siguientes [Estatuto de CEQA] y el Código de Reglamentos de California [CCR, por sus siglas en inglés], Título 14, División 6, Capítulo 3, Sección 15000 y siguientes [Directriz de CEQA]). El Distrito necesita saber las opiniones de las agencias, las organizaciones, los dueños de propiedad, y los partidos interesados sobre el alcance y contenido del reporte de impacto al medio ambiente.

**TÍTULO DEL PROYECTO:** Programa de Reurbanización del Distrito

**UBICACIÓN DEL PROYECTO:** El propuesto programa de reurbanización abarca las escuelas de todo el Distrito, que tiene la mayor cantidad de estudiantes de cualquier sistema de escuelas públicas de California y es el segundo mayor distrito de escuelas públicas en los Estados Unidos. El Distrito de 710 millas cuadradas incluye la mayoría de el condado de Los Angeles, con todos o parte de 31 ciudades, incluyendo áreas no incorporadas.

**DESCRIPCIÓN DEL PROYECTO:** En el 2008, los votantes del Condado de Los Ángeles aprobaron la Medida Q como mecanismo de financiación para continuar con los diversos programas de LAUSD para ofrecer facilidades escolares de alto nivel. Esta medida permite que el Distrito construya asientos de aulas necesarias para implementar las reducciones de aulas de acuerdo el Acta de la Calidad de Inversiones Escolares (QEIA, por sus siglas en inglés) y para ayudar a acomodar futuro crecimiento en la inscripción como resultado de la mayor tasa de graduación y las proyecciones de la disminución de inscripción prevista alrededor del 2015. La medida también le ayudaría al Distrito satisfacer los requisitos que son exigidos por el tribunal, como el Asentamiento de Williams y el Decreto de Consentimiento de Chanda Smith, entre otros.

Bajo la Medida Q, y en asociación con otros programas de facilidades de LAUSD continuamente en desarrollo, el Distrito se propone reparar, renovar y modernizar proyectos en cientos de escuelas vecindarias por todo el Distrito. No todos los proyectos se llevarán a cabo en cada campus, y en algunos campus no se realizarán las reparaciones, renovaciones, o modernizaciones. Cada categoría del proyecto se llevará a cabo en las escuelas que tienen la mayor necesidad, según lo determina el Plan de Ejecución Estratégico adoptado por la Mesa Directiva de Educación de LAUSD.

El programa puede incluir, pero no se limita, a los siguientes tipos de instalaciones específicos al campus:

- Seguridad, Terremoto, Eemergencia, Prevención de Fuego (modificación de sistemas de seguridad y vida; reemplazar las pipas y el sistema de plomería, sistemas de aire acondicionado y filtración de ventilación, etc. )
- Plomo, Asbesto, y Otros Cumplimientos con el Código
- Centros de Transición para la Carrera de Educación de Estudiantes Desabilitados (renovar las instalaciones existentes)
- Renovaciones de la Biblioteca (mejora y equipamiento de las bibliotecas y centros de comunicación)
- Rreparación y Expansión de Escuelas (la provisión de muebles y equipo, reabrir escuelas cerradas, reparación y pintura exterior, reparar y sustituir las taquillas, etc. )
- Computadora y Comunicaciones (modernizar las aulas, modificación de los sistemas de telecomunicacion y teleconferencia de vídeo, nuevo hardware y software, etc. )
- Escuelas Sostenibles (mejorar la eficiencia de la energía, eficiencia en el uso del agua y la energía renovable)
- Educación para Adultos y Carreras (proporcionar las facilidades necesarias para el entrenamiento de carreras)
- Educación de la Primera Infancia (renovar, reparar, y crear centros de educación inicial)
- Servicio de Alimento (reemplazar el equipo, renovar los comedores escolares secundarios, sustituir sistemas de refrigeración, etc. )
- Aulas Temporales (reemplazar, renovar, o trasladar aulas portátiles)

**IMPACTOS AMBIENTALES POTENCIALES:** De acuerdo con la Sección 15082 de la Directriz Estatal de CEQA, LAUSD ha preparado esta Notificación de Preparación para proporcionarle a las agencias, las organizaciones, los dueños de propiedad, y los partidos interesados información describiendo la propuesta y sus efectos ambientales potenciales. Los factores ambientales que seran analizados en el EIR incluyen:

- |                                 |                                   |                                     |
|---------------------------------|-----------------------------------|-------------------------------------|
| • Estética                      | • Recursos Agrícolas y Forestales | • Calidad del Aire                  |
| • Recursos Biológicos           | • Recursos Culturales             | • Geología y Suelos                 |
| • Emisiones de Gas Invernaderos | • Riesgos y Materiales Peligrosas | • Hidrología y Calidad del Agua     |
| • Uso del Suelo y Planeación    | • Recursos Minerales              | • Ruido                             |
| • Seguridad Peatonal            | • Población y Viviendas           | • Servicios Públicos                |
| • Recreación                    | • Transporte y Tráfico            | • Utilidades y Sistemas de Servicio |

**PERIODO DE REVISIÓN PÚBLICA:** Conforme al Código de Reglamentos de California, Título 14, Sección 15082 (b), el Distrito está solicitando comentarios con relación a los impactos ambientales del proyecto propuesto. El Distrito aceptará comentarios escritos entre el 18 de noviembre de 2013 y el 18 de diciembre de 2013.

**COMENTARIOS PÚBLICOS:** Por favor indique una persona de contacto y envíe sus comentarios a:

Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 28<sup>th</sup> Floor  
Los Angeles, CA 90017  
Atención: John Anderson

Comentarios también pueden ser enviados por FAX a (213) 241-4119, o por correo electrónico a [john.r.anderson@lausd.net](mailto:john.r.anderson@lausd.net). Por favor incluya "Program de Reurbanización del Distrito" en el encabezado.

**DEPARTMENT OF TRANSPORTATION****DISTRICT 7, TRANSPORTATION PLANNING**

IGR/CEQA BRANCH

100 MAIN STREET, MS # 16

LOS ANGELES, CA 90012-3606

PHONE: (213) 897-9140

FAX: (213) 897-1337

*Flex your power!  
Be energy efficient!*

December 4, 2013

Mr. John Anderson  
Los Angeles Unified School District  
333 South Beaudry Avenue, 28<sup>th</sup> Floor  
Los Angeles, CA 90017

IGR/CEQA No. 131127AL-NOP  
Districtwide Redevelopment Program  
Vic. Countywide  
SCH # 2013111046

Dear Mr. Anderson:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of repair, expansion, upgrade, and modernization projects at hundreds of neighborhood schools throughout the school district, including fire and seismic safety improvements; hazardous materials code compliance; new and upgraded adult and career education facilities and early childhood education facilities; upgrades to libraries, computer and communications systems, food service facilities, and temporary classrooms; and improved water and energy efficiency, and installation of renewable energy.

Per your telephone conversation with Mr. Alan Lin, project coordinator on December 4, 2013, and to assist in evaluating the impacts of this project on State transportation facilities, a traffic study should be prepared prior to preparing the Draft Environmental Impact Report (DEIR) when there is heavy construction and operation impact with additional traffic trips (new students or staff) to the state facilities. An independent traffic study may be necessary if a separate environmental process is required for each school project. Please refer the project's traffic consultant to Caltrans' traffic study guide Website:

[http://www.dot.ca.gov/hq/tpp/offices/ocp/igr\\_ceqa\\_files/tisguide.pdf](http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf)

Listed below are some elements of what is generally expected in the traffic study:

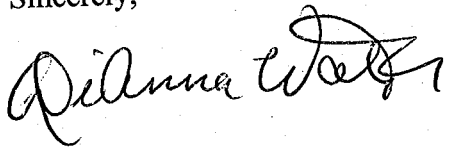
1. Presentations of assumptions and methods used to develop trip generation, trip distribution, choice of travel mode, and assignments of trips to freeways, and all on/off ramps. The Department has concerns about queuing of vehicles using off-ramps that will back into the mainline through lanes. It is recommended that the lead agency determine whether project-related plus cumulative traffic is expected to cause long queues on the on and off-ramps. We would like to consult with the traffic consultant to identify study locations on the State facilities before preparing the Environmental Impact Report (EIR) or in a separate environmental process for each school project.

2. Analysis of ADT, AM and PM peak-hour volumes for both the existing and future conditions in the affected area. Utilization of transit lines and vehicles, and of all facilities, should be realistically estimated. Future conditions should include build-out of all projects and any plan-horizon years.
3. Inclusion of all appropriate traffic volumes. Analysis should include existing traffic, traffic generated by the project, cumulative traffic generated from all specific approved developments in the area, and traffic growth other than from the project and developments.
4. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts including construction traffic impacts. These mitigation discussions should include, but not be limited to, the following:
  - Description of Transportation Infrastructure Improvements
  - Financial Costs, Funding Sources and Financing
  - Sequence and Scheduling Considerations
  - Implementation Responsibilities, Controls, and Monitoring
5. Caltrans may accept fair share contributions toward pre-established or future improvements on the State Highway System. Please use the following ratio when estimating project equitable share responsibility: additional traffic volume due to project implementation is divided by the total increase in the traffic volume (see Appendix "B" of the Guide).

We look forward to reviewing the traffic study and expect to receive a copy from the State Clearinghouse when the DEIR is completed. Should you wish to expedite the review process or receive early feedback from Caltrans please feel free to send a copy of the DEIR directly to our office.

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 131127AL.

Sincerely,



DIANNA WATSON  
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

26 November 2013

Los Angeles Unified School District  
Office of Environmental Health & Safety  
333 S. Beaudry Ave., 28<sup>th</sup> Fl.  
Los Angeles, CA 90017  
ATTN: John Anderson

**SUBJECT: Comments on Notice of Preparation for Districtwide Redevelopment Program**

Dear Mr. Anderson:

The City of Rancho Palos Verdes is in receipt of the above-mentioned Notice of Preparation (NOP).

The City is particularly interested in impacts of the Districtwide Redevelopment Program as they relate to the replacement, upgrading or relocation of temporary/portable classrooms. There are two (2) District campuses within the City, and the neighborhoods surrounding these campuses have frequently expressed concern to the City about the lack of consultation and notification provided by the District when temporary/portable classrooms are replaced, added or relocated. In addition, the City has previously expressed to the District its concerns about the impacts of additional temporary/portable classrooms upon neighborhood aesthetics and traffic/circulation. We would draw the District's attention to Government Code Section 65402(c), which requires the District to seek a determination on the consistency of the placement of new temporary/portable classrooms with the City's General Plan before such action is completed. Unfortunately, it has been the City's experience that the District generally neglects to abide by the requirements of Section 65402(c) (see enclosure).

At such time as campus-specific development projects are identified as a part of this Districtwide program, the City of Rancho Palos Verdes would appreciate timely notification of any proposed projects at the following District campuses:

Rudecinda Sepulveda Dodson (Middle)  
28014 Monterey Dr.  
Rancho Palos Verdes, CA 90275

Crestwood Street (Elementary)  
1946 Crestwood St.  
Rancho Palos Verdes, CA 90275

**John Anderson**  
**26 November 2013**  
**Page 2**

If you have any questions or need additional information, please feel free to contact me at (310) 544-5226 or via e-mail at [kitf@rpv.com](mailto:kitf@rpv.com).

Sincerely,



**Kit Fox, AICP**  
Senior Administrative Analyst

enclosure

cc: Mayor Susan Brooks and City Council  
Carolyn Lehr, City Manager  
Carolynn Petru, Deputy City Manger  
Joel Rojas, Director of Community Development



## **Government Code Section 65402**

(a) If a general plan or part thereof has been adopted, no real property shall be acquired by dedication or otherwise for street, square, park or other public purposes, and no real property shall be disposed of, no street shall be vacated or abandoned, and no public building or structure shall be constructed or authorized, if the adopted general plan or part thereof applies thereto, until the location, purpose and extent of such acquisition or disposition, such street vacation or abandonment, or such public building or structure have been submitted to and reported upon by the planning agency as to conformity with said adopted general plan or part thereof. The planning agency shall render its report as to conformity with said adopted general plan or part thereof within forty (40) days after the matter was submitted to it, or such longer period of time as may be designated by the legislative body.

If the legislative body so provides, by ordinance or resolution, the provisions of this subdivision shall not apply to: (1) the disposition of the remainder of a larger parcel which was acquired and used in part for street purposes; (2) acquisitions, dispositions, or abandonments for street widening; or (3) alignment projects, provided such dispositions for street purposes, acquisitions, dispositions, or abandonments for street widening, or alignment projects are of a minor nature.

(b) A county shall not acquire real property for any of the purposes specified in paragraph (a), nor dispose of any real property, nor construct or authorize a public building or structure, in another county or within the corporate limits of a city, if such city or other county has adopted a general plan or part thereof and such general plan or part thereof is applicable thereto, and a city shall not acquire real property for any of the purposes specified in paragraph (a), nor dispose of any real property, nor construct or authorize a public building or structure, in another city or in unincorporated territory, if such other city or the county in which such unincorporated territory is situated has adopted a general plan or part thereof and such general plan or part thereof is applicable thereto, until the location, purpose and extent of such acquisition, disposition, or such public building or structure have been submitted to and reported upon by the planning agency having jurisdiction, as to conformity with said adopted general plan or part thereof. Failure of the planning agency to report within forty (40) days after the matter has been submitted to it shall be conclusively deemed a finding that the proposed acquisition, disposition, or public building or structure is in conformity with said adopted general plan or part thereof. The provisions of this paragraph (b) shall not apply to acquisition or abandonment for street widening or alignment projects of a minor nature if the legislative body having the real property within its boundaries so provides by ordinance or resolution.

(c) A local agency shall not acquire real property for any of the purposes specified in paragraph (a) nor dispose of any real property, nor construct or authorize a public building or structure, in any county or city, if such county or city has adopted a general plan or part thereof and such general plan or part thereof is applicable thereto, until the location, purpose and extent of such acquisition, disposition, or such public building or structure have been submitted to and reported upon by the planning agency having jurisdiction, as to conformity with said adopted general plan or part thereof. Failure of the planning agency to report within forty (40) days after the matter has been submitted to it shall be conclusively deemed a finding that the proposed acquisition, disposition, or public building or structure is in conformity with said adopted general plan or part thereof. If the planning agency disapproves the location, purpose or extent of such acquisition, disposition, or the public building or structure, the disapproval may be overruled by the local agency.

Local agency as used in this paragraph (c) means an agency of the state for the local performance of governmental or proprietary functions within limited boundaries. Local agency does not include the state, or county, or a city.



# COUNTY OF LOS ANGELES

## FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

December 19, 2013

John Anderson, Staff Member  
Los Angeles Unified School District  
District Office  
333 South Beaudry Ave., 28th Floor  
Los Angeles, CA 90017

Dear Mr. Anderson:

**PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "DISTRICTWIDE REDEVELOPMENT PROGRAM," IT CONSISTS OF REPAIR, EXPANSION, UPGRADE, AND MODERNIZATION AT HUNDREDS OF NEIGHBORHOOD SCHOOLS THROUGHOUT THE SCHOOL DISTRICT, LOS ANGELES COUNTYWIDE (FFER #201300205)**

The Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

### PLANNING DIVISION:

1. We will reserve our comments for the draft EIR analysis.

### LAND DEVELOPMENT UNIT:

1. The County of Los Angeles Fire Department, Land Development Unit, has no comments regarding the Notice of Preparation at this time. We will have specific comments and requirements once the Draft Environmental Impact Report is circulated for review and during architectural plan review of schools within the County of Los Angeles Fire Department jurisdiction.
2. The proposed school improvements must comply with all applicable County of Los Angeles Fire Code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY

DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
GLENDDORA  
HAWAIIAN GARDENS  
HAWTHORNE

HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRWINDALE  
LA CANADA FLINTRIDGE  
LA HABRA

LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER  
LAWNDALE  
LOMITA  
LYNWOOD

MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT  
PICO RIVERA

POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER

John Anderson, Staff Member  
December 19, 2013  
Page 2

3. Specific fire and life safety requirements for the proposed school improvements within the County of Los Angeles Fire Department jurisdiction will be addressed when architectural plans are submitted to our Engineering Section within the Fire Prevention Division for review and approval prior to building permit issuance.
4. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Juan Padilla, at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.
5. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

**FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:**

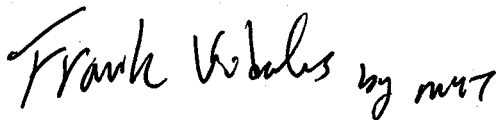
1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

**HEALTH HAZARDOUS MATERIALS DIVISION:**

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Handwritten signature of Frank Vidales in cursive, with the initials "mv" written below the signature.

FRANK VIDALES, CHIEF, FORESTRY DIVISION  
PREVENTION SERVICES BUREAU

FV:jl

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard, Suite 100  
West Sacramento, CA 95691  
(916) 373-3715  
Fax (916) 373-5471  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
Ds\_nahc@pacbell.net  
e-mail: ds\_nahc@pacbell.net



November 18, 2013

Mr. John Anderson, Project Officer – Office of Environmental Health & Safety

**Los Angeles Unified School District**

333 South Beaudry Avenue, 28<sup>th</sup> Floor  
Los Angeles, CA 90017

RE: SCH#2013111046 CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **“District-wide Redevelopment Program draft Environmental Impact Report (EIR) Project;”** located in Los Angeles County,, California

Dear Mr. Anderson:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Los Angeles County, California  
November 18, 2013**

**Beverly Salazar-Folkes**  
1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes9@msn.com  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

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**This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH@2013111046; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Districtwide Redevelopment Program; located in Los Angeles County, California.**

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# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

December 24, 2013

John Anderson  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
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Los Angeles, CA 90017

## **Notice of Preparation of a CEQA Document for the Districtwide Redevelopment Program**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft NEPA document. Please send the SCAQMD a copy of the Draft NEPA document upon its completion. Note that copies of the Draft NEPA document that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft NEPA document directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for calculating PM<sub>2.5</sub> emissions and PM<sub>2.5</sub> significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a NEPA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

#### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, NEPA requires that mitigation measures that go beyond what is required by law be considered to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as NEPA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

#### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Sincerely,



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM

LAC131114-04  
Control Number