



January 7, 2020 | Response to Comments



RESEDA CHARTER HIGH SCHOOL

Comprehensive Modernization Project

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor
Los Angeles, California 90017
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213.241.3432

Prepared by:

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Table of Contents

Section	Page
1. INTRODUCTION.....	1-1
1.1 INTRODUCTION.....	1-1
1.2 DOCUMENT FORMAT.....	1-1
1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES.....	1-1
2. RESPONSE TO COMMENTS.....	2-1

Table of Contents

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1. Introduction

1.1 INTRODUCTION

This document includes a compilation of the public comments received on the Reseda Charter High School Comprehensive Modernization Project Mitigated Negative Declaration (MND) and supporting Initial Study and Los Angeles Unified School District's (LAUSD) responses to the comments.

Under the California Environmental Quality Act (CEQA), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND. In the spirit of public disclosure and engagement, the LAUSD—as the lead agency for the proposed comprehensive modernization project—has responded to all written comments submitted during the 30-day MND public review period, which began October 30th, 2019, and closed November 29th, 2019.

1.2 DOCUMENT FORMAT

This document is organized as follows:

Section 1, Introduction. This section describes CEQA requirements and the content of this document.

Section 2, Responses to Comments. This section provides a list of agencies and interested persons commenting on the MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

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

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

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of a MND is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204 (c) advises, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion

supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204 (d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required for MNDs; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

NOTICE OF INTENT

Per CEQA Guidelines Section 15072 and 15073, the LAUSD determined that an MND would be required for this proposed Project and issued a Notice of Intent to Adopt a Mitigated Negative Declaration (NOI) on October 30th, 2019. The public review period for this CEQA document was from October 30th, 2019, to November 29th, 2019. Public outreach for the proposed Project was initiated in April 2019 and a previous community meeting was held on April 30th, 2019.

Public outreach for the MND included: publishing the NOI in two newspapers: the Los Angeles Daily News and La Opinion; mailing the NOI to the residences of current students of Reseda Charter High School; e-mailing or mailing the NOI to interested parties, including but not limited to those who have previously requested notice or previous Project meeting attendees; and posting the NOI at the Reseda Charter High School campus. The IS/MND was made available to the public for review at four different locations and on the LAUSD CEQA website:

- LAUSD, Office of Environmental Health and Safety, 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017 (by appointment, call (213) 241-3432)
- Reseda Charter High School Main Office, 18230 Kittridge Street, Reseda, CA 91335
- West Valley Regional Branch Library, 19036 Vanowen Street, Reseda, CA 91335
- LAUSD Local District Northwest Office, 6621 Balboa Boulevard, Lake Balboa, CA 91406
- LAUSD CEQA website: <http://achieve.lausd.net/ceqa>

A public comment meeting for the IS/MND was held on **November 13th, 2019 at 6:00 PM** at the Reseda Charter High School Auditorium located at 18230 Kittridge Street, City of Los Angeles. All agencies, organizations, and interested parties were encouraged to attend.

2. Response to Comments

This section provides all written comments received on the circulated MND and supporting Initial Study and the District's response to each comment.

Letter Reference	Commenting Person / Agency	Date of Comment	Page Number
A	Marianne Maki, Public Comment Meeting	November 13, 2019	2-3
B	Miya Edmonson, California Department of Transportation	November 26, 2019	2-7

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LETTER A – Marianne Maki, Public Comment Meeting (2 pages)

COMMENT CARD / TARJETA DE COMENTARIO

Reseda Charter High School Comprehensive Modernization Project
Proyecto de Modernización Integral de la Escuela Preparatoria Reseda Charter
November 13, 2019 / 13 de noviembre de 2019

Name / Nombre:

Marianne Maki

Affiliation / Afiliación:

RCHS

Address / Dirección:

Comment / Comentarios:

What were the concerns about 1A-6?
Seismic and PCE? Nothing mentioned —
1A-5A, 5B, 5C were identified as
potentially ~~for~~ impacted
When will you address the letter I wrote
on 4/30/19 →

Written comments must be received no later than November 29, 2019 at the following address:

Envía su comentarios antes de 29 de noviembre de 2019 a la siguiente dirección:

LAUSD Office of Environmental Health and Safety
333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017

Attn: William Meade
or CEQA-comments@lausd.net

Showcase state-of-the-art
forensic lab ~~for~~ paid by
federal money thru CTE Perkins

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A. Response to Comments from Marianne Maki, dated November 13, 2019

- A-1 Room IA6 is considered part of Industrial Arts Building #7, which includes Rooms IA4, IA5A, IA5B, and IA6. While Room IA6 does not share any walls with the other rooms in Industrial Arts Building #7, it does share a foundation with them. Therefore, discussion of the Industrial Arts Building #7 in the Preliminary Endangerment Assessment (PEA) – Equivalent Report and the Supplemental PEA – Equivalent Report, applies to Room IA6 as well as the other rooms that comprise Industrial Arts Building #7. The concern about the Industrial Arts Building #7 discussed in the PEA – Equivalent Reports was that elevated levels of tetrachloroethene (PCE) were found beneath the foundation slab of the building. Since Room IA6 shares the same foundation as the other rooms in Industrial Arts Building #7, this concern applies to Room IA6 in addition to the other rooms in the building. Once elevated levels of PCE were detected, the indoor air in the Industrial Arts Building #7 and the outdoor air surrounding the building were sampled. PCE was not detected above the residential preliminary screening level (PSL) (0.46 µg/m³) in any of the 23 indoor or outdoor air samples collected during three sample dates. However, due to the potential for the soil vapor to enter the indoor space in the Industrial Arts Building #7 and out of an abundance of caution, the building was vacated. In addition, Industrial Arts Building #7 was identified as meeting the Assembly Bill (AB) 300 criteria for requiring seismic evaluation and it was determined that the building would require a seismic retrofit if preserved.
- A-2 Question is acknowledged. This question was not related to an environmental issue. The Los Angeles Unified School District Board of Education will consider all comments prior to making a decision on the Project.
- A-3 Comment is acknowledged. This comment was not related to an environmental issue. The Los Angeles Unified School District Board of Education will consider all comments prior to making a decision on the Project.

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LETTER B – Miya Edmonson, California Department of Transportation

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

LAUSD
OFFICE OF
ENV. HEALTH & SAFETY
2019 DEC -3 AM 11:25

Gavin Newsom, Governor



Making Conservation
a California Way of Life.

November 26, 2019

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

RE: Reseda Charter High School
Comprehensive Modernization Project –
Mitigated Negative Declaration (MND)
SCH # 2019109089
GTS # 07-LA-2019-02906
Vic. LA-101/PM: 21.142

Dear Mr. William Meade:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this Mitigated Negative Declaration (MND). The Project includes the demolition of 10 permanent buildings, 23 relocatable buildings, storage units, and covered walkways; the construction of new buildings (including classrooms, administration, library, multipurpose/performing arts, and cafeteria/lunch shelter); upgrading/replacing infrastructure; and new landscaping and hardscaping. The proposed Project also consists of barrier removal upgrades, exterior painting, and limited interior improvements. LAUSD completed a PEA-E investigation to assess environmental conditions at selected areas within the Project footprint. Based on the PEA-E findings, a Removal Action Workplan (RAW) was prepared to remove approximately 266 cubic yards of soil impacted with arsenic and lead and to remediate soil vapor associated with the former Industrial Arts building.

After reviewing the MND, we concur that the project is the modernization of an existing school site and does not include any growth or capacity increase from either increased student population or operational uses. Therefore, it is understood that there would be no increase in vehicle trips associated with the site after the completion of the modernization and impacts would be less than significant.

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

If you have any questions, please contact Reece Allen, the project coordinator, at reece.allen@dot.ca.gov, and refer to GTS # 07-LA-2019-02906

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

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

} B-1
} B-2

B. Response to Comments from Miya Edmonson, California Department of Transportation, dated November 26, 2019

- B-1 The statement is acknowledged for the record. The Los Angeles Unified School District Board of Education will consider all comments prior to making a decision on the Project.
- B-2 The recommendation is acknowledged for the record. The Los Angeles Unified School District Board of Education will consider all comments prior to making a decision on the Project.