



ERRATA TO THE ENVIRONMENTAL IMPACT REPORT

The Fig Project

Environmental Case: ENV-2016-1892-EIR
State Clearinghouse No.: 2016071049

Project Location: 3900–3972 S. Figueroa Street, 3901–3969 S. Flower Drive, 450 W. 39th Street, Los Angeles, CA 90037

Community Plan Area: Southeast Los Angeles

Council District: 9 - Price

Project Description: The Fig Project (Project) is a seven-story mixed-use development comprised of Hotel, Student Housing, and Mixed-Income Housing components, within three separate buildings with maximum building heights of up to 78 feet. The Hotel Component includes 298 guest rooms, 15,335 square feet of retail and restaurant uses, 13,553 square feet of shared guest and public amenities, and 7,203 square feet of public meeting spaces, and includes a basement level. The Student Housing Component includes 222 student housing units and 32,991 square feet of retail and restaurant uses. The Mixed-Income Housing Component includes 186 dwelling units (82 dwelling units reserved for Very Low Income households), 20,364 square feet of office, and 7,000 square feet of retail and restaurant uses. All three components would be served by a central eight-story above-ground parking structure, containing one subterranean parking level and a rooftop amenity level, with a maximum building height of up to 88 feet. The Project results in up to 620,687 square feet of floor area*, and a floor area ratio (FAR) of 3.25:1, including a commercial FAR of 0.50:1. The Project includes the removal of eight multi-family residential buildings within the Flower Drive Historic District, the removal of surface parking areas, and the export of approximately 60,800 cubic yards of soil.

**Note: Following release of the Draft EIR, the Project's total floor area decreased from 624,167 to 620,687 square feet.*

PREPARED FOR:

The City of Los Angeles
Department of City Planning

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APPLICANT:

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ERRATA TO THE ENVIRONMENTAL IMPACT REPORT FOR THE FIG PROJECT

1. Introduction

This Errata makes minor technical corrections and clarifications to the Draft and Final Environmental Impact Report (EIR) for The Fig project (Project). These EIR modifications clarify and refine the EIR and provide supplemental information to the City decision-makers and the public. CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5), but before the EIR is certified. Section 15088.5 of the CEQA Guidelines specifically states:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.*
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

The information added pursuant to this Errata does not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect environmental effect of the Project or a feasible way to mitigate or avoid such an effect that the Applicant has declined to adopt. Additionally, information provided in this Errata does not present a feasible Project alternative or mitigation measure considerably different from others previously analyzed in the EIR. All of the information added pursuant to this Errata merely clarifies, corrects, adds to, or makes insignificant modifications to information in the EIR. The City has reviewed the information in this Errata and has determined that it does not change any of the basic findings or conclusions of the EIR, does not constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5, and does not require recirculation of the Draft EIR.

2. Topical Issue No. 1—Project Site Zoning

The Draft and Final EIR, relying upon publicly available information provided by the Department of City Planning’s Zoning Information and Map Access System (ZIMAS), identify the entire Project Site’s existing land use designation under the Southeast Los Angeles Community Plan (Community Plan) as Community Commercial, and its existing zoning designation under the Los Angeles Municipal Code (LAMC) as C2-1L. As set forth by the Community Plan, the Community Commercial land use designation is consistent with the CR, C2, C4 and RAS3 zones.

While the EIR and ZIMAS correctly reflect the Project Site’s existing Community Commercial land use designation (consistent with Community Plan designation), additional research into City records has determined that a portion of the Project Site is not in fact zoned C2-1L, but is instead zoned R4-1L. The Community Plan does not identify the R4 zone as a consistent zoning classification under the Community Commercial land use designation.

The Project Site’s inconsistent zoning information appears to stem from the City’s update of the Community Plan in 2000. Under case number CPC 96-0398-CPR, the City undertook the 2000 Community Plan update to “identity and redefine outdated land use issues and inconsistent zoning, review policies and programs, as well as initiate and incorporate Open Space and Public Facilities Zones.”¹ Specifically, this Community Plan update revised the Community Plan text, amended the Community Plan land use map, and changed land use designations, zone classifications, and height districts for various properties.² The properties subject to these proposed changes were identified both on a map (Change Map) as well as in a table (Recommendations Table). The Change Map identifies the Project Site as being located within Subarea 270.³ The Recommendations Table indicates that, for Subarea 270, the previously existing Highway

¹ *CPC 96-0398-CPR, April 9, 1998 staff report to the City Planning Commission, p. 1.*

² *Ibid., p. 4.*

³ *Ibid., Exhibit B-1. See Attachment 1 of this Errata.*

Commercial land use designation was to be changed to Community Commercial, and all R4-zoned portions of the subarea along Flower Drive were to be rezoned to C2.⁴

On April 9, 1998, the City Planning Commission approved the proposed Community Plan update and the proposed land use, zoning classifications, and height district changes. On March 22, 2000, the City Council adopted a resolution approving the proposed amendments to the Community Plan's text and maps as well as the associated zone and height district changes.⁵ The adoption of this resolution effectuated the Community Plan's re-designation of the Project Site from Highway Commercial to Community Commercial. Concurrently with its adoption of this resolution, the City Council instructed the Department of City Planning to prepare and present for adoption the necessary ordinances implementing the Community Plan update's zone and height district changes, and update the appropriate City maps.⁶

Despite the City Council's adoption of the Community Plan update and the associated zone and height district changes, and its direction to City Planning staff to present implementing ordinances for the zone and height district changes, it does not appear that any rezoning ordinance addressing Subarea 270 (or multiple other subareas identified on the Change Map or Recommendations Table) was brought forward or subsequently adopted. As a result, those R4-zoned portions of Subarea 270 were not finally rezoned to C2, despite the City Council's adoption of the Community Plan update, and notwithstanding the R4 zone's inconsistency with the adopted Community Commercial land use designation.

The City further considered the entire Project Site to be subject to commercial zoning regulations when the City Council adopted Footnote 14 to the Community Plan's land use map in 2007. Specifically, Footnote 14 establishes a floor area ratio (FAR) limit of 1:1 for 100 percent commercial projects within Community Commercial-designated properties along Figueroa Street, including the entirety of the Project Site. Further pursuant to Footnote 14, mixed-use projects are authorized to seek zone and height district changes to achieve increased FAR, and 100 percent residential projects are prohibited. Accordingly, the City's previous established intent in 2000 to zone the Project Site for commercial and mixed-use projects (and not for residential-only projects, as would be permitted under R4 zoning) was reiterated in 2007 through the adoption of Footnote 14.

Notwithstanding the City Council's approval of the 2000 Community Plan update, the establishment of Footnote 14 in 2007, and the published information on ZIMAS depicting C2-1L zoning, the Draft and Final EIR are being revised to replace all references to the existing Project Site in order to reflect the technically correct zoning designation of the Project Site. Therefore, references to the entirety of the site being zoned C2-1L are being replaced with the combination of

⁴ *Ibid.*, Exhibit C. See Attachment 2 of this Errata.

⁵ *Council File 99-0496, City Council Resolution, March 22, 2000. See Attachment 3 of this Errata.*

⁶ *Council File 99-0496, City Council Action and PLUM Committee Report, March 22, 2000. See Attachment 4 of this Errata.*

C2-1L and R4-1L zones. These proposed revisions do not change any of the requested entitlements or the EIR's determinations or impact conclusions for the following reasons:

- As described above, the Community Plan designates the entirety of the Project Site for Community Commercial land uses. In the hierarchy of land use controls, the Community Plan, which is a component of the City's General Plan, serves as the foundation for all land use decisions within the Community Plan area. Accordingly, the Project Site's Community Commercial land use designation reflects the City's land use goal of encouraging commercial and mixed-uses at the Project Site, consistent with the C2-1L zone, instead of residential-only uses, as would be permitted under the R4 zone.
- As set forth in detail in Section IV.G, Land Use, of the Draft EIR, the Project is substantially consistent with the Community Plan's land use, housing, and economic development goals, objectives, and policies, as well as the provisions of Footnote 14. Therefore, no new inconsistency with the General Plan or Community Plan is created by the identification of R4 zoning. On the contrary, the Project, which includes a request to establish C2-2D zoning across the entirety of the Site, would remedy the Project Site's existing zoning/land use inconsistency, and achieve conformance with the land use goals and policies of the Community Commercial land use designation.
- The Project's requested entitlements, including a zone and height district change as well as other associated entitlements, will permit the Project's proposed uses and development envelope. The recent identification of R4 zoning upon a portion of the Project Site does not trigger a need for any new or modified entitlement approvals. Furthermore, no changes have been made to the Project's proposed uses, density, height, or operations as a result of the identification of R4 zoning upon a portion of the Site. Therefore, no new or revised analysis of the Project's impacts is necessary.

3. Topical Issue No. 2—Community Plan Boundary Change

The Draft and Final EIR describe the Project Site's location within the Southeast Los Angeles Community Plan area, reflecting the existing conditions when the Project's entitlement and vesting tentative tract map applications were filed. The EIR also discusses the City's recent efforts to update the Southeast Los Angeles Community Plan, which are occurring concurrently with an update to the South Los Angeles Community Plan, which abuts the western boundary of the Southeast Los Angeles Community Plan. Currently, properties along the west side of Figueroa Street are within the South Los Angeles Community Plan, and properties along the east side of Figueroa Street (including the Project Site) are within the Southeast Los Angeles Community Plan. In connection with these simultaneous Community Plan update efforts, a Community Plan boundary adjustment will occur in the vicinity of the Project Site, in order to bring both sides of Figueroa Street under a single Community Plan (the South Los Angeles Community Plan). This boundary change does not result in any proposed changes to the Project Site's land use or zoning designations, or relevant development regulations including applicable Community Plan footnotes, beyond those described in the EIR when discussing the proposed Southeast Los Angeles Community Plan update. Moreover, as noted above and discussed in the EIR, the Project is vested against changes in the relevant ordinances, policies, and standards occurring after its vesting tentative tract map and vesting zone and height district change applications were deemed complete, which occurred on September 8, 2016. Accordingly, the boundary change between the

South and the Southeast Los Angeles Community Plan does not change any of the Project's requested entitlements or the EIR's determinations or impact conclusions.

4. Topical Issue No. 3—Height Measurement and Number of Stories of Parking Structure

As discussed in the Draft and Final EIR, the Project's requested vesting zone and height district change includes an increase in allowable height to a maximum of 90 feet. The Draft EIR also identifies the maximum roof height of the hotel, student housing, and mixed-income housing components as being 78 feet; the maximum roof height of the parking structure as being 88 feet; and the maximum height of the overall Project (including roof projections) as being 90 feet. The Final EIR reflects these same numbers, but in some instances, refers to maximum building heights instead of maximum roof heights. As required by the LAMC, the height of a building is measured from grade (as defined by the LAMC) to the highest point of the roof, structure, or the parapet wall, whichever is highest. The Project includes parapet walls, which extend above the roof height measurements provided in the Draft EIR, but which do not exceed the identified 90-foot maximum height of the Project. Accordingly, to reflect the Project's maximum building heights, measured per the LAMC, the EIR's maximum roof height references are hereby revised to reflect a maximum building height of 83 feet from grade to parapet for the hotel, student housing component, and mixed-income housing components; and a maximum building height of 90 feet from grade to parapet for the parking structure.

The Project's proposed parking structure consists of seven levels of above-grade parking above one subterranean level of parking, and the EIR refers to the structure as a seven-level structure. The roof level of the structure is improved with various hotel and residential amenity areas, including enclosed fitness center and lounge spaces which constitute floor area. Since these occupied roof-level areas constitute an additional story under the LAMC, the parking structure is properly considered under the LAMC to include eight stories.

No changes have been made to the proposed height of any of the proposed Project structures, including the Project's hotel, residential, or parking structure components, or to the proposed use of any of the Project's structures. Furthermore, as noted above, the Project's maximum height is accommodated by the requested vesting zone and height district change. Accordingly, revisions to the EIR to reflect the LAMC-measured building heights and an eight-story parking structure do not require any new or revised analysis of the Project or any change in the EIR's impact determinations.

5. Response to Late LAUSD Draft EIR Comment Letter

Subsequent to the close of the Draft EIR comment period and the publication of the Final EIR, the City received a late comment letter from the Los Angeles Unified School District (LAUSD) dated October 19, 2018. A copy of this letter is provided in Attachment 5. The letter provides comments regarding the Project's impacts to nearby schools, including impacts related to noise, traffic, access, and pedestrian safety. The letter also suggests mitigation measures for the Project.

As discussed in the Draft EIR, the closest LAUSD school to the Project Site is the Dr. Theodore T. Alexander Science Center School located more than 1,000 feet to the northwest at 3737 South Figueroa Street. This school is also separated from the Project Site by intervening buildings and by traffic on Figueroa Street. As explained in the responses to the environmental topics raised in the comment letter that are provided below, potential impacts to the Dr. Theodore T. Alexander Science Center School were evaluated in the Draft EIR and were determined to be less than significant.

Noise from Construction Activities—The comment letter states that construction noise from the Project may affect the school and suggests that language be added to noise mitigation measures to allow the school to notify the applicant when additional measures are needed. Specifically, LAUSD identifies an exterior noise standard of 67 dBA L_{eq} , an interior noise standard of 45 dBA L_{eq} , and a noise level increase of up 3 dBA or more over ambient noise levels as a significant increase.

The Dr. Theodore T. Alexander Science Center School was specifically included as Receptor R5 within Section IV.H, Noise, of the Draft EIR and a quantitative analysis of potential noise impacts was conducted for this sensitive receptor. To evaluate noise impacts at this receptor, existing ambient noise levels were measured and were found to be approximately 68.7 dBA L_{eq} during the daytime hours when the school is in operation (refer to Table IV.H.7 of the Draft EIR). Noise levels from construction activities associated with the Project, including grading and use of heavy equipment were calculated and are presented in Table IV.H-11 of the Draft EIR. As shown therein, construction noise levels at the school associated with the various on-site Project construction phases would range from 53.3 dBA during landscaping/site work to 57.9 dBA during the grading phase. These noise levels would be less than existing daytime noise level of 68.7 dBA at the school and would not exceed the significance thresholds established by either the City of Los Angeles L.A. CEQA Thresholds Guide or LAUSD. In addition, the haul route for the Project would use Martin Luther King Jr. Boulevard to access the I-110 freeway and thus haul trucks would not pass by the school, which is located to the north. As such, the Project would not generate significant noise impacts from off-site construction activities at the school and no mitigation measures related to construction noise are required.

Traffic/Transportation—With regard to traffic, the comment letter requests specific measures be undertaken during Project construction activities. These include: allowing school buses unrestricted access to schools, prohibition of traffic delays for transported students, prohibition of impacts to bus performance and passenger safety, adherence to the California Vehicle Code, installation of traffic controls, notification to school administrators of impacts to vehicle routes, and maintenance of access to passenger loading areas.

Potential traffic impacts associated with construction and operation of the Project are addressed in detail in Section IV.J, Traffic and Access, of the Draft EIR. Operational traffic from the Project would result in some significant and unavoidable intersection Level of Service (LOS) impacts in the vicinity, and mitigation measures have been applied to the Project as feasible. In addition, as discussed above, the construction haul route would not pass by the Dr. Theodore T. Alexander Science Center School and construction and operational traffic would not impede school

bus or vehicular access to the school. Furthermore, the school is more than 1,000 feet to the northwest of the Project Site and thus direct access to the school from the street and its loading areas would not be affected by the Project. While vehicular traffic to the school may utilize streets adjacent to the Project Site, the Project would not result in any roadway improvements that would result in changes to traffic patterns for the school. Thus, since the Project would not impede access from the street to the school or to loading areas for the school, additional mitigation measures are not required for the Project. However, identified pedestrian routes for the school do include crossings along streets which are adjacent to the Project Site (e.g., Martin Luther King Jr. Boulevard, Figueroa Street, 39th Street, Flower Drive). To address general construction traffic impacts, the following Project Design Feature was previously identified in the EIR and is to be implemented as part of the Project:

Project Design Feature J-1: Prior to the start of construction, the Project shall prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan which shall facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Minimize obstruction of traffic lanes on Figueroa Street and 39th Street adjacent to the Project Site;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Designate travel routes for trucks on Figueroa Street, Martin Luther King Jr. Boulevard, and other arterial roadways, to prevent trucks from using residential streets;
- Limit sidewalk and lane closures, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan shall identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;

- Identify alternative sites for bus stops that must be temporarily relocated; and
- Parking for construction workers shall be provided either on-site or at off-site, off-street locations. Parking shall not be allowed on residential streets in the vicinity of the Project.

This project design feature already incorporates several of LAUSD's suggested measures that address delays and safety and would ensure that construction activities do not significantly impact vehicles accessing the Dr. Theodore T. Alexander Science Center School. In addition, in response to this comment, Project Design Feature J.1 has been modified to include the following provisions that are specific to LAUSD:

- The contractor or its designee shall notify the LAUSD Transportation Branch and the site administrator of the Dr. Theodore T. Alexander Science Center School of the expected start and ending dates of construction. In addition, the contractor must coordinate with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects related to existing pedestrian and school bus routes, and school drop off/pick up areas on the proximate LAUSD facilities. In addition, throughout the duration of construction, the contractor must maintain safe and convenient pedestrian routes to schools (refer to the map provided for the Alexander Science Center at <https://achieve.lausd.net/Page/3990> or as may be updated by LAUSD). The contractor must also notify workers of the provision of the California Vehicle Code that requires vehicles to stop when encountering school buses using red-flashing-lights must-stop-indicators and that no staging or parking of construction-related vehicles, including worker-transport vehicles, shall occur on or adjacent to a school property.

This modification to Project Design Feature J-1 will be included in the Mitigation Monitoring Plan adopted for the Project. Implementation of this project design feature will ensure that construction traffic impacts to the Dr. Theodore T. Alexander Science Center School will be less than significant.

Pedestrian Safety—With regard to pedestrian safety, LAUSD suggests measures be implemented during construction that include ongoing communication with LAUSD, maintaining safe and convenient pedestrian routes to schools, use of traffic controls, prohibition of haul routes from passing LAUSD schools, prohibition of parking on or adjacent to a school property, funding for cross guards where a school crossing may be impacted, use of barriers or fencing along the construction site, and use of security patrols.

As set forth above, Project Design Feature J-1 has been revised to require the contractor to communicate with LAUSD and to notify Dr. Theodore T. Alexander Science Center School of construction activities prior to construction. This project design feature was also revised to prohibit construction-related parking at or adjacent to the school. Project Design Feature J-1 already

includes traffic controls, including use of flagmen, for all vehicles accessing the Project Site as well as provisions to ensure adequate pedestrian access throughout the area. As discussed above, the haul route for the Project Site is located to the south and thus, construction trucks would not pass by the Dr. Theodore T. Alexander Science Center School. In addition, Project Design Feature I.1 in Section IV.I.1, Public Services—Police Protection, of the Draft EIR also already requires implementation of temporary security measures during construction including security fencing, lighting, and locked entry. Thus, with implementation of the proposed project design features, including modification to Project Design Feature J-1, impacts associated with pedestrian access to and from the Dr. Theodore T. Alexander Science Center School will continue to be less than significant.

6. Specific Revisions to EIR Text

Specific revisions and corrections to the text of Section I, Executive Summary; Section II, Project Description; Section IV.G, Land Use; and Section IV.J, Traffic and Access, of the Draft EIR regarding the Project Site's zoning, height measurements, the number of stories included in the proposed parking structure, and the revision to Project Design Feature J-1 are identified below. In addition, minor revisions to the Project Site's lot area and floor area, as set forth in the Final EIR, are also reflected below. Deletions are shown in ~~striketrough text~~ and additions are shown in underlined text. All other references to the Project Site's zoning as only C2-1L in the EIR shall be considered to be revised to refer to both C2-1L and R4-1L zoning. All other references to the Project's building heights and number of stories of the parking structure shall be considered to be revised as described above.

Draft EIR Section I, Executive Summary, page I-6, revise the second paragraph as follows:

The Project Site is located within the Southeast Los Angeles Community Plan (Community Plan), adopted in March 2000, and designated for Community Commercial land uses. The Project Site is also subject to Footnote 14 of the Community Plan's land use map, which facilitates increases in floor area ratio (FAR) for mixed-use, affordable housing, and student housing projects. The Project Site is zoned C2-1L (Commercial, Height District No. 1L) and R4-1L (Multiple Dwelling, Height District No. 1L) by the Los Angeles Municipal Code (LAMC). The C2 zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The R4 zone permits multi-family residential and limited hotel and ground-floor commercial uses. Height District 1L restricts building heights to 75 feet, six stories, and establishes a maximum FAR of 1.5:1 within the C2 zone, and a maximum FAR of 3:1 within the R4 zone.

Draft EIR Section I, Executive Summary, page I-17, revise the first bullet and the first two sub-bullets as follows:

- Vesting Zone and Height District Change from C2-1L and R4-1L to (T)(Q)C2-2D pursuant to LAMC Section 12.32 Q to facilitate:

- An increase in FAR ~~from 1.5:1 to 3.25:1~~ FAR across the Project Site for a mixed-use project including both student and affordable housing, in conformance with Community Plan Footnote No. 14;
- An increase in height ~~from six stories/75 feet to seven~~ eight stories/90 feet across the Project Site;

Draft EIR Section I, Executive Summary, page I-21, revise the first full paragraph as follows:

Alternative 4, the Zoning Compliant Alternative, would construct a mixed-use project with approximately 249,000 square feet of residential uses and a combined total of approximately 40,000 square feet of commercial uses, in accordance with the existing land use designation and City-approved zoning of the Project Site. Specifically, Alternative 4 would include 210 student housing units, 90 mixed-income housing units (including approximately 32 affordable housing units), approximately 30,000 square feet of retail uses, and approximately 10,000 square feet of restaurant uses. In total, the Zoning Compliant Alternative would construct approximately 289,000 square feet of new floor area within three buildings on the Project Site. The new buildings would not exceed the 75 foot/six-story height limited imposed by the existing C2-1L and R4-1L zone. In addition, Alternative 4 would include approximately 600 parking spaces within a five-story above-ground parking garage to support the proposed uses. Upon completion, the Zoning Compliant Alternative would result in a maximum FAR of 1.5:1 in compliance with Community Plan Footnote 14.

Draft EIR Section I, Executive Summary, page I-65, revise the second paragraph as follows:

The Project Site is currently zoned C2-1L (Commercial, Limited Height District 1) and R4-1L (Multiple Dwelling, Limited Height District 1) by the LAMC. The C2 zone permits a wide array of land uses, including residential, commercial, office, retail, restaurant, and hotel uses. The R4 zone permits multi-family residential uses and limited hotel and ground-floor commercial uses. Height District 1L restricts building heights to 75 feet, six stories, and a maximum FAR of 1.5:1 within the C2 zone, and a maximum FAR of 3:1 within the R4 zone. The Project is a mixed-use development consisting of residential, hotel, office retail, and restaurant uses. The Project would result in up to ~~624,167~~ 620,687 square feet of new floor area and a total FAR of 3.245:1 across the ~~492,605~~ 191,047 square foot Project Site. Proposed building ~~roof~~ heights would be ~~78-83~~ feet for the hotel building, student housing, and mixed-income buildings, and ~~88-90~~ feet for the parking structure.⁷ Thus, the Project's residential and commercial uses would be generally consistent with the C2 and R4 zone's permitted land uses, but would exceed the FAR and height limit of Height District 1L zone.

⁷ Elevator cores, stair towers, and other roof protrusions would not exceed a maximum height of 90 feet.

Draft EIR Section II, Project Description, page II-6, revise the second paragraph as follows:

The Project Site is zoned C2-1L (Commercial, Height District No. 1L) and R4-1L (Multiple Dwelling, Height District No. 1L) by the LAMC. The C2 zone permits a wide array of land uses including commercial, office, residential, retail, and hotel uses. The R4 zone permits multi-family residential uses and limited hotel and ground-floor commercial uses. Height District 1L restricts building heights to 75 feet/six stories, and establishes a maximum FAR of 1.5:1 within the C2 zone, and a maximum FAR of 3:1 within the R4 zone.

Draft EIR Section II, Project Description, pages II-24 and II-25, revise the first bullet and the first two sub-bullets as follows:

- Vesting Zone and Height District Change from C2-1L and R4-1L to (T)(Q)C2-2D pursuant to LAMC Section 12.32 Q to facilitate:
 - An increase in FAR ~~from 1.5:1~~ to 3.25:1 FAR across the Project Site for a mixed-use project including both student and affordable housing, in conformance with Community Plan Footnote No. 14;
 - An increase in height ~~from six stories/75 feet~~ to seven-eight stories/90 feet across the Project Site;

Draft EIR Section IV.G, Land Use, page IV.G-8, revise the second full paragraph as follows:

The City of Los Angeles Zoning Code (Chapter 1 of the LAMC) regulates development through zoning designations and development standards. As shown in Revised Figure IV.G-2—on page IV.G-9, the Project Site is currently zoned C2-1L (Commercial, Limited Height District 1) and R4-1L (Multiple Dwelling, Limited Height District 1). The C2 commercial zone permits a wide array of land uses, such as retail stores, offices, hotels, schools, parks, and theaters. The C2 zone also permits one-family dwellings, two-family dwellings, apartment houses, and any residential use permitted in the R4 (Multiple Residential) zone. The R4 zone permits multi-family residential uses and limited hotel and ground-floor commercial uses. The Height District 1L designation imposes a height limit whereby no building or structure shall exceed six stories, or 75 feet in height. Furthermore, the total floor area contained in all the main buildings on a lot ~~in a commercial zone~~ in Height District 1L shall not exceed a maximum floor area ratio (FAR) of 1.5:1 within the C2 zone, and a maximum FAR of 3:1 within the R4 zone. The Project's consistency with the LAMC is analyzed in the impact analysis below.

Draft EIR Section IV.G, Land Use, page IV.G-9, replace Figure IV.G-2 with Revised Figure IV.G-2 on page 12:



Revised Figure IV.G-2
Zoning Designations on the Project Site

Draft EIR Section IV.G, Land Use, page IV.G-19, revise the second paragraph as follows:

As previously discussed, pursuant to the Community Plan, and as shown above in Figure IV.G-1 on page IV.G-7, the current land use designation for the Project Site is Community Commercial. As shown in Revised Figure IV.G-2 on page IV.G-9, the current zoning designation for the Project Site is C2-1L (Commercial, Limited Height District 1) and R4-1L (Multiple Dwelling, Limited Height District 1).

Draft EIR Section IV.G, Land Use, page IV.G-27, revise the first bullet and the first two sub-bullets as follows:

- Vesting Zone and Height District Change from C2-1L and R4-1L to (T)(Q)C2-2D pursuant to LAMC Section 12.32 Q to facilitate:
 - An increase in FAR ~~from 1.5:1 to 3.25:1~~ FAR across the Project Site for a mixed-use project including both student and affordable housing, in conformance with Community Plan Footnote No. 14;
 - An increase in height ~~from six stories/75 feet to seven~~ eight stories/90 feet across the Project Site;

Draft EIR Section IV.G, Land Use, page IV.G-71, revise the first full paragraph as follows:

As previously discussed, the Project Site is currently zoned C2-1L (Commercial, Limited Height District 1) and R4-1L (Multiple Dwelling, Limited Height District 1) by the LAMC. The C2 zone permits a wide array of land uses, including residential, commercial, office, retail, restaurant, and hotel uses. The R4 zone permits multi-family residential uses and limited hotel and ground-floor commercial uses. Height District 1L restricts building heights to 75 feet, six stories, and a maximum FAR of 1.5:1 within the C2 zone, and a maximum FAR of 3:1 within the R4 zone. The Project is a mixed-use development consisting of residential, hotel, office retail, and restaurant uses. The Project would result in up to ~~624,167~~ 620,687 square feet of new floor area and a total FAR of 3.245:1 across the 192,605 square foot Project Site. Proposed building ~~roof~~ heights would be ~~78~~ 83 feet for the hotel building, student housing, and mixed-income buildings, and ~~88~~ 90 feet for the parking structure.⁸ Thus, the Project would be consistent with the C2 and R4 zone's permitted land uses, but would exceed the FAR and height limit of Height District 1L ~~zone~~.

Draft EIR Section IV.J, Traffic and Access, pages IV.J-43 and IV.J-44, revise Project Design Feature J-1 as follows:

⁸ *Elevator cores, stair towers, and other roof protrusions would not exceed a maximum height of 90 feet.*

Project Design Feature J-1: Prior to the start of construction, the Project shall prepare a Construction Traffic Management Plan and submit it to LADOT for review and approval. The Construction Traffic Management Plan shall include a Worksite Traffic Control Plan which shall facilitate traffic and pedestrian movement and minimize the potential conflicts between construction activities, street traffic, bicyclists, and pedestrians. The plan shall show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. Furthermore, the Construction Traffic Management Plan and Worksite Traffic Control Plan shall include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction;
- Schedule construction material deliveries during off-peak periods to the extent practical;
- Minimize obstruction of traffic lanes on Figueroa Street and 39th Street adjacent to the Project Site;
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, and on-site where possible, to avoid an impact to the surrounding roadways;
- Coordinate truck activity and deliveries to ensure trucks do not wait to unload or load at the Project Site and impact roadway traffic, and if needed, utilize an organized off-site staging area;
- Control truck and vehicle access to the Project Site with flagmen;
- Designate travel routes for trucks on Figueroa Street, Martin Luther King Jr. Boulevard, and other arterial roadways, to prevent trucks from using residential streets;
- Limit sidewalk and lane closures, and avoid peak hours to the extent possible. Where such closures are necessary, the Project's Worksite Traffic Control Plan shall identify the location of any sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity;
- Identify alternative sites for bus stops that must be temporarily relocated; and
- Parking for construction workers shall be provided either on-site or at off-site, off-street locations. Parking shall not be allowed on residential streets in the vicinity of the Project.
- The contractor or its designee shall notify the LAUSD Transportation Branch and the site administrator of the Dr. Theodore T. Alexander Science Center School of the expected start and ending dates of construction. In addition, the contractor must coordinate with LAUSD site administrators and/or designated representatives to ensure that effective measures are employed to reduce construction-related effects related to existing pedestrian and school bus routes, and school drop off/pick up

areas on the proximate LAUSD facilities. In addition, throughout the duration of construction, the contractor must maintain safe and convenient pedestrian routes to schools (refer to the map provided for the Alexander Science Center at <https://achieve.lausd.net/Page/3990> or as may be updated by LAUSD). The contractor must also notify workers of the provision of the California Vehicle Code that requires vehicles to stop when encountering school buses using red-flashing-lights must-stop-indicators and that no staging or parking of construction-related vehicles, including worker-transport vehicles, shall occur on or adjacent to a school property.

Draft EIR Section V, Alternatives, page V-82, Alternative 4, revise the first full paragraph as follows:

Alternative 4, the Zoning Compliant Alternative, would construct a mixed-use project with approximately 249,000 square feet of residential uses and a combined total of approximately 40,000 square feet of commercial uses, in accordance with the existing land use designation and City-approved zoning of the Project Site. Specifically, Alternative 4 would include 210 student housing units, 90 mixed-income housing units (including approximately 32 affordable housing units), approximately 30,000 square feet of retail uses, and approximately 10,000 square feet of restaurant uses. In total, the Zoning Compliant Alternative would construct approximately 289,000 square feet of new floor area within three buildings on the Project Site. The new buildings would not exceed the 75 foot/six-story height limited imposed by the existing C2-1L and R4-1L zone. In addition, Alternative 4 would include approximately 600 parking spaces within a five-story above-ground parking garage to support the proposed uses. The Zoning Compliant Alternative would reduce the amount of excavation, soil hauling, and construction since it would not construct the hotel building proposed by the Project, which would include one subterranean level. Accordingly, the construction amount and duration for Alternative 4 would also be reduced compared to the Project. Upon completion, the Zoning Compliant Alternative would result in a maximum FAR of 1.5:1 in compliance with Community Plan Footnote 14.

Attachment 1

Change Map

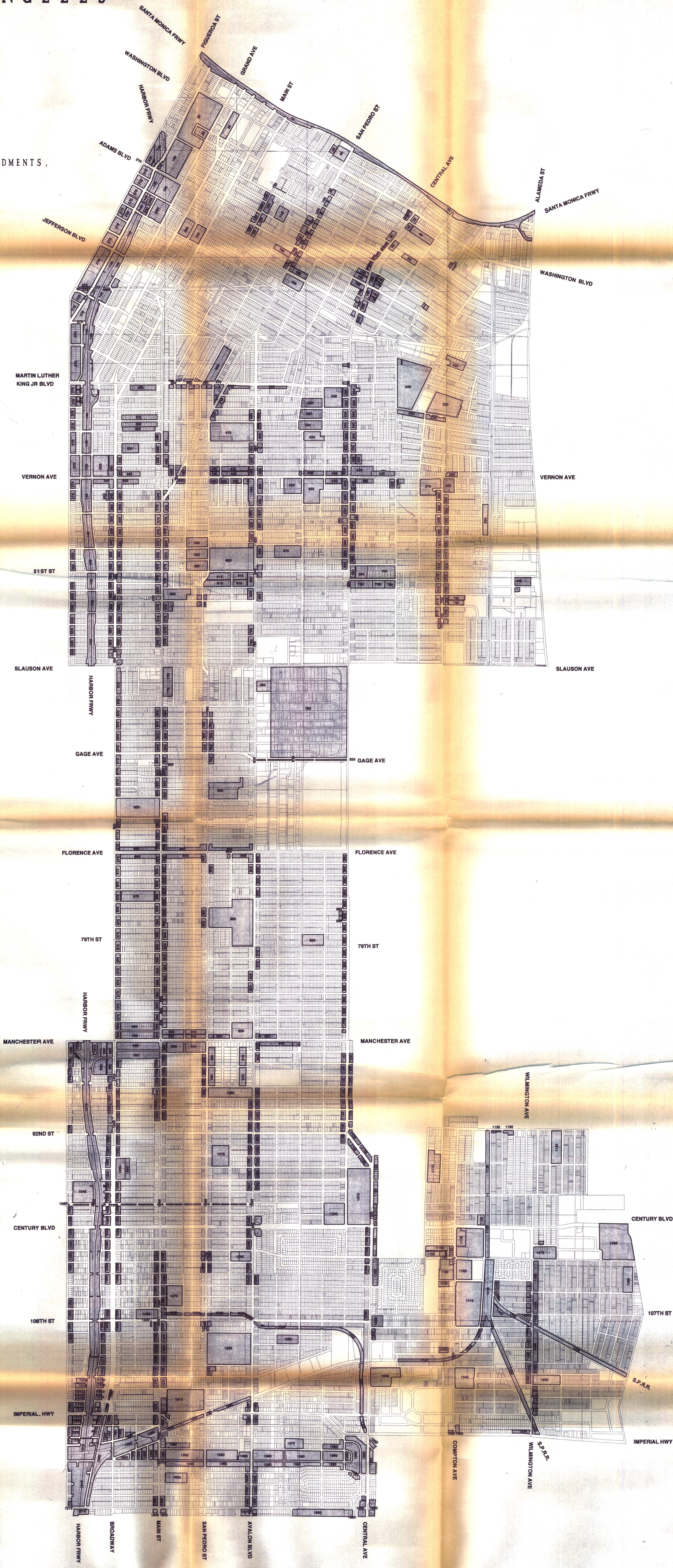
SOUTHEAST LOS ANGELES

CITY PLAN CASE NO. CPC 96-0398

EXHIBIT "B-1"

COMMUNITY PLAN REVISION PROGRAM
RECOMMENDED ZONE CHANGES, PLAN ADMENDMENTS,
AND HEIGHT DISTRICT CHANGES

NUMBER INDICATES SUBAREA



Department of City Planning
Con Howe, Director
Prepared in March 1998 by the
Geographic Information System Section



Attachment 2

Recommendations Table

EXHIBIT A - 1

Southeast LA Community Plan Area
Recommendation Table

| Subarea (Note 2) | Street Name | EXISTING | | | RECOMMENDATIONS | | |
|---------------------|------------------------------|----------|-----------------|-----------|-----------------|--------|----------|
| | | Acres | Plan Landuse | Zoning | Plan Landuse | Zoning | Comments |
| 260 | *, See Note 1 | 1.6634 | PUBG | R4-2 | PF | PF-1 | |
| | *, See Note 1 | 1.6845 | OSGE | R4-2 | PF | PF-1 | |
| ***** | | | | | | | |
| sum | | 6.6631 | | | | | |
| 270 | W Martin Luther King Jr Blvd | .3848 | HYWY | C2-1-L | COMC | C2-1L | |
| | W 037 Pl | .1063 | HYWY | C2-1-L | COMC | C2-1L | |
| | W 39 St | .1456 | HYWY | R4-1-L | COMC | C2-1L | |
| | W 38 St | 1.8226 | HYWY | C2-1-L | COMC | C2-1L | |
| | W 38 St | .1529 | HYWY | R4-1-L | COMC | C2-1L | |
| | W 37 Pl | .1103 | HYWY | C2-1-L | COMC | C2-1L | |
| | S Flower St | 2.4305 | HYWY | C2-1-L | COMC | C2-1L | |
| | S Figueroa St | 4.3823 | HYWY | C2-1-L | COMC | C2-1L | |
| | *, See Note 1 | 31.0844 | HYWY | C2-1-L | COMC | C2-1L | |
| | *, See Note 1 | .2427 | HYWY | R4-1-L | COMC | C2-1L | |
| | *, See Note 1 | .1653 | HYWY | C2-1-VL-O | COMC | C2-1L | |
| | *, See Note 1 | .6778 | HYWY | R3-1-L | COMC | C2-1L | |
| | *, See Note 1 | .2152 | STRE | NOT ZONED | COMC | C2-1L | |
| | *, See Note 1 | 1.7304 | HYWY | C2-1-VL-O | COMC | C2-1VL | |
| | *, See Note 1 | .1583 | HYWY | P-1-L | COMC | C2-1L | |
| | Flower Dr | 3.6993 | HYWY | R4-1-L | COMC | C2-1L | |
| | Flower Dr | .1285 | HYWY | R4-1-VL | COMC | C2-1L | |
| ***** | | | | | | | |
| sum | | 47.6370 | | | | | |
| 275 | W Vernon Ave | .2699 | NBOF | C2-1-VL | GENC | C2-1VL | |
| | W 045 St | .1837 | NBOF | C2-1-VL | GENC | C2-1VL | |
| | S Figueroa St | 1.3895 | NBOF | C2-1-VL | GENC | C2-1VL | |
| | *, See Note 1 | 1.5215 | HYWY | C2-1-VL | GENC | C2-1VL | |
| | *, See Note 1 | 1.2299 | NBOF | P-1-VL | GENC | C2-1VL | |
| | *, See Note 1 | .4096 | NBOF | R3-1-VL | GENC | C2-1VL | |
| | *, See Note 1 | 4.1707 | NBOF | C2-1-VL | GENC | C2-1VL | |
| ***** | | | | | | | |
| sum | | 9.1749 | | | | | |
| 280 | W Martin Luther King Jr Blvd | 2.2124 | HYWY | C2-1-VL | GENC | C2-1VL | |
| | W 40 Pl | .1631 | HYWY | C2-1-VL | GENC | C2-1VL | |
| | *, See Note 1 | .0638 | HYWY | C2-1-VL | GENC | C2-1VL | |
| ***** | | | | | | | |

Note: 1. * - No street name associated with this property area.

2. Please refer to Exhibit B-1 for Subarea locations.

Run Date: 03/07/98

Program: seexa.sql

Report: seexa.lis

Attachment 3

City Council Resolution

RESOLUTION

WHEREAS, the Southeast Los Angeles Community Plan was adopted by the City Council on March 21, 1974 and amended in January of 1989, through the General Plan/Zoning Consistency Program, and by several limited amendments through the Periodic Plan Review Program; and

WHEREAS, the Community Plan Revision Program consists of amendments to the Southeast Los Angeles Community Plan map and text with associated zone and height district changes; and

WHEREAS, an Hearing Examiner, as the representative of the City Planning Commission, held public hearings on December 2 and 3, 1997 on the Preliminary Plan consisting of the changes and amendments developed in the Community Plan Revision Program; and

WHEREAS, a notice of the public hearing was mailed to approximately 23,000 people in November 1997, located within or near the general area where changes were proposed, in accordance with Section 12.32-C I(a) of the Los Angeles Municipal Code; and

WHEREAS, The General Plan Advisory Board on March 18, 1998 recommended approval of the Preliminary Plan; and

WHEREAS, the City Planning Commission conducted a limited public hearing on April 9, 1998 to allow testimony concerning areas that were added to the list of recommendations after the December 1997 hearings; and

WHEREAS, notice of the limited public hearing was mailed to all interested parties in March, 1998 in accordance with Section 12.32 CI(a) of the Los Angeles Municipal Code; and

WHEREAS, evidence, both written and oral, were duly presented to and considered by the City Planning Commission at the aforesaid public hearings, including but not limited to staff report, exhibits, appendices and public testimony; and

WHEREAS, the amendments to the Southeast Los Angeles changes in the land use and policies that have occurred in the community since the current Plan was adopted; and

WHEREAS, the majority of the plan amendments and zone changes are recommended to bring properties into compliance with the Open Space and Public Facilities Zone, adopted by the City Council which provides regulations for use and development of open space and publicly owned land; and

WHEREAS, the proposed Final Environmental Impact Report, No. 96-0026, determined that the project will have a significant impact on the environment but these are mitigated by Plan provisions and other City programs; and

WHEREAS, a Statement of Overriding Considerations identifies the following areas of net unmitigated adverse impacts, Solid Waste, Transportation, Recreation and Park facilities,

Libraries and Seismic Activity; and

WHEREAS, the overriding considerations of social, economic and other benefit of the Plan Revision will outweigh the environmental costs; and

WHEREAS, pursuant to the City Charter and ordinance provisions, the Mayor and the City Planning Commission have transmitted their recommendations.

NOW, THEREFORE, BE IT RESOLVED that: The Southeast Los Angeles Community Plan with the associated zone changes be amended.

BE IT FURTHER RESOLVED that the Final Environmental Impact Report has been found to comply with the California Environmental Quality Act and the State and City Guidelines relating thereto and, that the City Council hereby certifies the Final Environmental Impact Report and instructs that a "Notice of Determination" be filed with the Los Angeles County Clerk and the Los Angeles City Clerk, in accordance with Article VI, Sections 11b and 11d of the City of Los Angeles Guidelines for the Implementations of the California Environmental Quality Act of 1970, as amended.

I CERTIFY THAT THE FOREGOING
RESOLUTION WAS ADOPTED BY THE
COUNCIL OF THE CITY OF LOS ANGELES
AT ITS MEETING OF MARCH 22, 2000
BY A MAJORITY OF ALL ITS MEMBERS.



J. MICHAEL CAREY,
CITY CLERK

BY Victoria Warner
DEPUTY

Attachment 4

City Council Action and PLUM Committee Report

J. MICHAEL CAREY
City Clerk

When making inquiries
relative to this matter
refer to File No.

CITY OF LOS ANGELES
CALIFORNIA



RICHARD J. RIORDAN
MAYOR

Office of the
CITY CLERK
Council and Public Services
Room 615, City Hall
Los Angeles, CA 90012
Council File Information - (213) 485-5703
General Information - (213) 485-5705

99-0496

CDS 1,8,9&15

March 24, 2000

Planning Commission (with file)
Council Member Hernandez
Council Member Ridley-Thomas
Council Member Walters
Council Member Svorinich
Director of Planning
Planning Department,
Community Planning Section
cc: GIS Section - Attn: Fae Tsukamoto
221 N. Figueroa Street, Room 900

Bureau of Engineering,
Land Development Group
Attn: Ron Olive
Department of Transportation,
Traffic/Planning Sections
Department of Building & Safety
c/o Zoning Coordinator
Fire Department

RE: GENERAL PLAN AMENDMENTS FOR THE SOUTHEAST LOS ANGELES COMMUNITY PLAN
REVISION

At the meeting of the Council held March 22, 2000, the following
action was taken:

| | |
|---|----------|
| Attached report adopted | <u>X</u> |
| Statement of overriding considerations adopted..... | <u>X</u> |
| Attached resolution adopted..... | <u>X</u> |
| Mayor concurred..... | _____ |
| Mayor failed to act - deemed approved..... | _____ |
| Findings adopted..... | <u>X</u> |
| Negative Declaration adopted..... | _____ |
| Categorically exempt..... | _____ |
| Generally Exempt..... | _____ |
| EIR certified..... | <u>X</u> |

J. Michael Carey

City Clerk
bs

steno\990496

PLACE IN FILES

OCT 19 2000

DEPUTY

TO THE COUNCIL OF THE
CITY OF LOS ANGELES

FILE NO. 99-0496

Your **PLANNING AND LAND USE MANAGEMENT** Committee

reports as follows:

| | <u>Yes</u> | <u>No</u> |
|-----------------|------------|-----------|
| Public Comments | <u>XX</u> | <u>—</u> |

ENVIRONMENTAL IMPACT REPORT, STATEMENT OF OVERRIDING CONSIDERATIONS, PLANNING AND LAND USE MANAGEMENT COMMITTEE REPORT and RESOLUTION relative to General Plan Amendments for the Southeast Los Angeles Community Plan Revision.

Recommendations for Council action:

1. CERTIFY that the Environmental Impact Report (EIR No. 96-0026; State Clearing House No. 96011034) has been completed in compliance with the California Environmental Quality Act, the State Guidelines and the City Guidelines and that the City Council has reviewed the information contained therein and considered it along with other factors related to this project; that this determination reflects the independent judgment of the lead agency City of Los Angeles; and that the documents constituting the record of proceedings in this matter are located in Council File 99-0496 in the custody of the City Clerk and in the files of the Department of City Planning in the custody of the Environmental Review Section; and ADOPT the Environmental Impact Report.
2. ADOPT FINDINGS made pursuant to and in accordance with Section 21081 of the Public Resources Code and the Statement of Overriding Considerations prepared by the City Planning Department.
3. ADOPT FINDINGS of the City Planning Commission as the Findings of the City Council.
4. ADOPT accompanying RESOLUTION as recommended by the Mayor, the City Planning Commission, the Director of Planning and the General Plan Advisory Board, APPROVING the proposed General Plan Amendments, the Community Plan Text and Map with associated zone and height district changes amending the Southeast Los Angeles Community Plan Revision and portions of the General Plan of the City of Los Angeles.

CPC 96-0398 CPR

5. INSTRUCT City Planning Department to prepare and present for adoption the necessary ordinances implementing these plan amendments and zone and height district changes as shown on the Plan Text and changing the zones in concept.

6. INSTRUCT the City Planning Department (GIS) to update the General Plan and appropriate maps pursuant to this action.

(Public Hearing Scheduled in Council March 22, 2000)

Fiscal Impact Statements: The City Planning Department advises that recovery of City administrative costs has been waived, as this is a City-initiated case.

Summary:

At its meeting held February 29, 2000, the Planning and Land Use Management Committee considered the transmittal from the Mayor and Director of Planning relative to the recommendations of the City Planning Commission in approving the proposed General Plan Amendment, the Community Plan Text and Map with associated zone and height district changes amending the Southeast Los Angeles Community Plan Revision and portions of the General Plan of the City of Los Angeles. The Committee recommended that Council approve the Southeast Community Plan Revision and related actions stated above.

Respectfully submitted,

PLANNING AND LAND USE MANAGEMENT COMMITTEE



Cindy Michaud

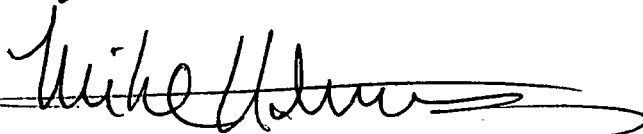
JAW:ys

3/2/00

Enc: CPC 96-0398 CPR

CDS 1,8,9 & 15

Attachment: Resolution



Note: (Notice has been published not less than 10 days prior to the public hearing date pursuant to Section 11.5.6 B and D of the Municipal Code).

#981192

STATEMENT OF OVERRIDING
CONSIDERATIONS, REPORT,
RESO & FINDINGS
ADOPTED

MAR 22 2000

LOS ANGELES CITY COUNCIL

EIR CERTIFIED

Attachment 5

Late LAUSD Draft EIR Comment Letter

Los Angeles Unified School District

Office of Environmental Health and Safety

AUSTIN BEUTNER
Superintendent of Schools

VIVIAN EKCHIAN
Deputy Superintendent

CARLOS A. TORRES
Interim Director, Environmental Health and Safety

October 19, 2018

Milena Zasadzien, City Planner
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012
Milena.Zasadzien@lacity.org

City of Los Angeles, Department of City Planning

SUBJECT: CASE NUMBER: VTT-74193-CN
CPC-2016-2658-VZC-HD-CU-MCUP-ZAD-SPR
ENV-2016-1892-EIR
PROJECT LOCATION: 3900 S. FIGUEROA STREET, LOS ANGELES CA

Presented below are comments submitted on behalf of the Los Angeles Unified School District (LAUSD) regarding the subject project. Due to the fact that Dr. Theodore T. Alexander Science Center School is located approximately 0.18 mile to the north of the proposed project site, LAUSD is concerned about the potential negative impacts of the project to our students, staff and parents traveling to and from the referenced campus.

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

Noise

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

LAUSD established maximum allowable noise levels to protect students and staff from noise impacts generated in terms of Leq. These standards were established based on regulations set forth by the California Department of Transportation and the City of Los Angeles. LAUSD's exterior noise standard is 67 dBA Leq and the interior noise standard is 45 dBA Leq. A noise level increase of 3 dBA or more over ambient noise levels is considered significant for existing schools and would require mitigation to achieve levels within 2 dBA of pre-project ambient level. To ensure that effective mitigations are employed to reduce construction related noise impacts on District sites, we ask that the following language be included in the mitigation measures for noise impacts:

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

Traffic/Transportation

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

- School buses must have unrestricted access to schools.
- 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.
- Parents dropping off their children must have access to the passenger loading areas.

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.
- Contractors are required to provide security patrols (at their expense) to minimize trespassing, vandalism, and short-cut attractions.

Additionally, the school's hours are from 8am to 3pm. The principal requests that the school not be hampered from 7:30 am to 8:00 am and 3:00 pm to 3:30 pm so that faculty and parents can enter and leave the site as needed.

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 Dr. Theodore T. Alexander Science Center School, their teachers and the staff, as well as to assuage the concerns of the parents of these students. Therefore, the measures set forth in these comments should be adopted as conditions of project approval to offset unmitigated impacts on the affected school students and staff.

Thank you for your attention to this matter. If you need additional information please contact me at (213) 241-3394.

Regards,

Christy Wong
Assistant CEQA Project Manager