COMMENT LETTER No. 1

Mr. Ronald R. Olive
City of Los Angeles Bureau of Engineering
Land Development Group
Bureau of Engineering
August 3, 2001

Subject: Comments on a Draft Environmental Impact Report (DEIR) for the "Hillcrest Christian School and Church West Campus Expansion Plan", EIR Case No. 99-0421 -CU-ZV-ZAA

The staff of the Bureau of Engineering has reviewed your referral dated June 21,2001. Please address the following comments in the Final EIR:

COMMENT 1.1

STREETS

A 2-foot wide strip of land should be dedicated along Rinaldi Street adjoining the proposed West Campus property in accordance with Major Highway-Class II Standards, including a 20-foot radius property line return at the intersection with Shoshone Avenue. In addition to the Shoshone Avenue street improvement mitigation measure as shown on figure IV.J.1-11 of the DEIR, a 2-foot street dedication should also be provided northerly of the transition area over the remaining project frontage to provide a 32-foot half street dedication.

RESPONSE TO COMMENT 1.1

This comment will be incorporated as revised mitigation measure and will be added as an additions and correction to the Final EIR.

COMMENT 1.2

DRAINAGE DISTRICT

The developer is advised that a charge of $950.00 per acre has to be paid into the Shoshone Avenue and Rinaldi Street Drainage District Facilities Account of the Board of Public Works of the City of Los Angeles Trust Fund prior to obtaining any permits.

RESPONSE TO COMMENT 1.2

To ensure compliance with this fee assessment, the following mitigation measure will be incorporated as an addition to the Final EIR:

> "The developer shall pay an assessment fee of $950.00 per acre has to the Shoshone Avenue and Rinaldi Street Drainage District Facilities Account of the Board of Public Works of the City of Los Angeles Trust Fund prior to obtaining any permits."

Please see Section II, Corrections and Additions.

COMMENT 1.3

SANITARY SEWERS

Construction of on-site sanitary sewers within appropriate easement may be required. The developer shall be required to pay Sewerage Facilities Charge as determined by the City Engineer. The Final EIR should include a complete description of the existing wastewater system which would serve the project, including its current capacity and flows as well as the location of all existing and proposed sanitary sewers and point of connections to the existing and proposed sanitary sewers.

The Final EIR should also describe a summary of adopted wastewater plans and policies relevant to the project.

Additionally, if offsite sanitary sewer construction is required in conjunction with this development, then the Final EIR must discuss the associated construction activities as if it were part of the proposed project and include an analysis of the environmental impacts which likely to be associated with this construction, as well as the mitigation measured that will be adopted.

Should you have any questions regarding the aforementioned comments, please call Ray Saidi at (213) 847-8274.

RESPONSE TO COMMENT 1.3

The project's impacts upon local wastewater infrastructure and regional treatment capacity are addressed in Section V.A., Impacts Determined to be Less Than Significant (See page 249 of the Draft EIR). As indicated in this discussion, the City of Los Angeles Public Works Department was consulted early on in the planning process. During this consultation, the Dept. of Public Works indicated the existing sewage infrastructure could accommodate the sewage generation resulting from the proposed project. Specifically, the correspondence from the City of Los Angeles Department of Public Works, Valley District, dated July 18, 2000, stated the following: (1) There is an existing 10-inch diameter public sewer located in both Shoshone Avenue and Rinaldi Street adjacent to the proposed development; (2) The existing 10-inch diameter public sewer lines in Shoshone Avenue and Rinaldi Street have

sufficient capacity to service the proposed development; (3) The Bureau of Engineering is not aware of any sewer distribution problems or deficiencies in the proposed development service area; and (4) The Bureau of Engineering does not anticipate any required disruption in sewer service to the surrounding area when the sewer connection is constructed. This correspondence was submitted in response to the NOP and is included in Appendix A to the Draft EIR. Based on this early assessment, the project's impacts on sewer service availability and infrastructure was determined to be less than significant.

Additionally, as stated in Section III.E, Project Approvals Required, under the subheading "Other Permits (As Needed)", additional discretionary or ministerial action may include sewer and water hook-up permits and Fire Department site plan review. As part of the requisite permitting approval process, the applicant will be responsible for all applicable fees and charges associated with each respective reviewing City Department. This would include any sewerage facilities charge as determined by the City Engineer.

COMMENT LETTER No. 1A

Sergio Valdez, Transportation Engineer
City of Los Angeles Department of Transportation
Valley Development Review Section, DOT
October 10, 2001

Subject:HILLCREST CHRISTIAN SCHOOL AND CHURCH WEST CAMPUS EXPANSION PLAN (EIR CASE NO. 99-0421-CU-ZV-ZAA)

COMMENT 1A.1

The Department of Transportation (DOT) has completed the review of the Draft Environmental Impact Review (DEIR) for the Hillcrest Christian School West Campus Expansion. The DEIR was prepared to examine and disclose the potential environmental impact the project may have due to the expansion. Overall the DEIR is satisfactory to the DOT except for a few comments. Some of the comments are pertinent while others are trivial. Nevertheless it is worth mentioning for the sake of completeness. The following are the pertinent comments that need attention/addressing:

-The "Final V/C Ratio" in Table IV.J.1-5 on page 210 should read 0.800 instead of 8.00.

RESPONSE TO COMMENT 1A.1

This comment notes a typographical error on page 210 of the Draft EIR. The Final V/C ratio for LOS C will be corrected to read " > 0.700 – 0.800" in the Corrections and Additions Section of the Final EIR. This change does not effect any of the conclusions of the Draft EIR.

COMMENT 1A.2

- The "interchange" in Table IV.J.1-12 on page 226 should read SR 118 instead of SR 119. And under the "Existing – 2000, D/C" column, there is a typo on row 3 where the value 0,481 should be 0.481.

RESPONSE TO COMMENT 1A.2

This comment notes a typographical error on page 226 of the Draft EIR. Table IV.J.1-12 will be corrected accordingly to read "Interchange SR 118" in the first row of the first column. See Section II, Corrections and Additions to the Draft EIR. This change does not effect any of the conclusions of the Draft EIR.

COMMENT 1A.3

- The word "less" should be "more" at the bottom line on page 227.

RESPONSE TO COMMENT 1A.3

This comment notes a typographical error on page 227 of the Draft EIR. This correction will be updated in Section II, Corrections and Additions to the Draft EIR. This change does not effect any of the conclusions of the Draft EIR.

COMMENT 1A.4

Some trivial comments include:

- From page 223 to 234, the designation on the bottom of each page should be IV.J.1 instead of IV.J.I.

RESPONSE TO COMMENT 1A.4

Comment noted.

COMMENT 1A.5

Under "Pedestrian Safety" on page 234 it made reference to Figure IV.J.1-12, which is nowhere to be found. Also on the same page it had mentioned that Shoshone Avenue will include a signalized pedestrian striped crosswalk. Is this striped signalized crosswalk separate from the existing signalized crosswalk at the intersection of Rinaldi Street and Shoshone Avenue? If not, then has this striped signalized crosswalk been approved by DOT? If one in the same, then what mitigating value does this pre-existing condition is realized here?

If you have any questions, please contact Ray Lao at (818) 756-9929.

RESPONSE TO COMMENT 1A.5

As noted, the reference to Figure IV.J.1-12 on page 234 of the Draft EIR was incorrect. There is no Figure IV.J.1-12. The correct Figure that is intended to be referenced is Figure IV.J.1-11, Proposed Traffic Mitigation Improvement, Rinaldi/Shoshone. This graphic is provided on page 231 of the Draft EIR. The striped signalized crosswalk that is referred to in this discussion is a modification to the existing crosswalk that already exists at this location. The only modification to the existing crosswalk will be increasing the length of the crosswalk as a result of the required widening of the Shoshone Avenue turn lane. The reference and discussion was merely provided to acknowledge the fact that the crosswalk will remain intact subsequent to the proposed roadway modifications. The purpose of this discussion was to note that with implementation of the pedestrian safety mitigation measures identified earlier in the discussion (Item 5 on page 230 of the Draft EIR) impacts would be reduced to less than significant levels.

COMMENT LETTER No. 2

Mr. Stephen J. Buswell
California Department of Transportation
IGR Office 1-10C
120 So. Spring St.
Los Angeles, CA 90012
July 19, 2001

Re: IGR/CEQA 010708NY
Hillcrest Christian School & Church
LA/405/47.75

COMMENT 2.1

Dear Mr. Liao:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Hillcrest Christian School & Church in the City of Granada Hills.

Based on our review of the information received, we have no comment at this time. We will contact you further should we identify any issues that should be brought to your attention.

If you have any questions, please call Mr. Yerjanian at (213)897-6536 and refer to IGR/CEQA # 010708NY.

RESPONSE TO COMMENT 2.1

As indicted by Caltrans, they have reviewed the Draft EIR and have no comments at this time.

COMMENT LETTER No. 3

State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812-3044
July 3, 2001

RE: Hillcrest Christian School and Church
SCH#: 2000061095

COMMENT 3.1

This is to acknowledge that the State Clearinghouse has received your environmental document for state review. The review period assigned by the State Clearinghouse is;

Review Start Date: June 25, 2001

Review End Date: August 8, 2001

We have distributed your document to the following agencies and departments:

California Highway Patrol

Caltrans, District 7

Caltrans, Division of Aeronautics

Department of Conservation

Department of Fish and Game, Region 5

Department of Parks and Recreation

Department of Toxic Substances Control

Native American Heritage Commission

Regional Water Quality Control Board, Region 4

Resources Agency

State Lands Commission

The State Clearinghouse will provide a closing letter with any state agency comments to your attention on the date following the close of the review period.

Thank you for your participation in the State Clearinghouse review process.

RESPONSE TO COMMENT 3.1

The Office of Planning and Research is the State agency responsible for receiving and circulating environmental documents to all applicable Stage agencies. This comment letter acknowledges the Draft EIR was submitted to the State Clearinghouse for distribution in accordance with the State CEQA Guidelines. Of the reviewing agencies listed above, only three comment letters were received by State agencies. These letters included Caltrans, District 7 (See Comment Letter No. 2), the California Highway Patrol (See attachment to Comment Letter No. 4); and the Department of Toxic Substances Control (See Comment Letter No. 7).

At the time the Draft EIR was submitted to the State Clearinghouse, the comment period was identified by the City of Los Angeles Planning Department as the 45-day period beginning June 21, 2001 and ending on August 6, 2001. The State Clearinghouse re-established the public comment period to end on August 8, 2001. Late comment letters were received after the close of the comment period and were accepted by the City of Los Angeles Planning Department up until September 4, 2001.

COMMENT LETTER No. 4

California Highway Patrol
State Clearinghouse
Governor's Office of Planning and Research
1400 Tenth Street
P.O. Box 3044
Sacramento, CA 95812-3044
August 9, 2001

Subject: Hillcrest Christian School and Church
SCH#: 2000061095

COMMENT 4.1

Dear Jimmy Liao:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on August 8, 2001, and the comments from the responding agency(ies) is (are) enclosed. If this comment package is not in order, please notify the State

Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-06l3 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

SCH# 2000061095

Project Title Hillcrest Christian School and Church

Lead Agency Los Angeles City Planning Department

Type EIR Draft EIR

Description The project includes a proposed three-story, 75,000 square-foot building on a 5.5 acre property in the Al-1 K zone, as an expansion of, and adjacent to, an existing 60,000 square-foot church and private school (grades K-I 2) on a separate parcel east of Shoshone Avenue in the A-1 zone, to allow a student increase from the currently permitted 800 maximum to 1,200 students, and a staff increase from the existing 70 to a proposed 130. New indoor construction would include a gymnasium, locker rooms, coaches offices, 21 classrooms, a library and cafeteria. New outdoor improvements would include an athletic field. The project will provide a 124-space parking lot, in lieu of the 286 spaces required by code, and will implement a shared parking program with overflow parking on the existing East Campus. The entire 5.5 acre project site will be graded, with cut slopes, and retaining

walls to 20-30 feet high. The three existing residences and the six accessory buildings and pools, and approximately 300 trees on the project site will be removed. The project requires a Conditlonal [sic] Use Permit to allow the proposed expansion to support the planned student enrollment and staff increase; a Zone Variance to allow the proposed reduction in parking requirements; a Zoning Administration Adjustment to allow the proposed 5-foot parking setback in lieu of the required 25-foot setback; and oak tree permit for the removal and/or replacement of on-site oak trees and a Haul Route Approval for exporting earth.

Lead Agency Contact

Name Jimmy Liao
Agency Los Angeles City Planning Department
Phone 213/580-5546
Address 221 North Figueroa Street, Room 1500
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City Granada Hills
Region
Cross Streets Shoshone Avenue and White Oak Avenue
Parcel No.
Township **Range** **Section** **Base**

Proximity To

Highways 5,118,405
Airports Van Nuys Airport
Railways
Waterways
Schools
Land Use A1-1, A1-1-K and RE20-1-K

Project Issues Aesthetic/Visual; Air Quality; Archaeological-Historic; Drainage/Absorption; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Growth Inducing; Land use; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 06/25/2001 **Start of Review** 6/25/2001 **End of Review** 08/08/2001

RESPONSE TO COMMENT 4.1

No specific comments on the adequacy of the DEIR are provided; therefore, no response is required per Section 15204 of the CEQA Guidelines. Attached to this letter was a single comment letter from the California Department of Highway Patrol (CHP). This comment letter is identified and addressed herein as attachment 4A.

ATTACHMENT 4A

Date: July 11, 2001
To: State Clearing House
100 Tenth Street
Sacramento, CA 95814
From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
West Valley Area
File No.: 580.10377.8776.env-impt
Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE,
SCH# 2000061095

COMMENT 4A.1

The West Valley Area of the California Highway Patrol (CHP) received a "Notice of Completion" environmental document from the Office of Special Projects (OSP). The plan outlined information regarding the expansion of the Hillcrest Christian School and Church located at 17531 Rinaldi Street Granada Hills, California. The document was sent to the West Valley Area for an assessment of any traffic related matters that may affect the local Area operation.

The West Valley Area doest not have law enforcement responsibilities in the immediate area surrounding the development site. Upon completion of the project, any noticeable increase in traffic volume would become the responsibility of the local police department. At the present time, Hillcrest Christian school does not operate student school buses. The West Valley Area could have minimal impact if the school begins a student school bus transportation system.

This project has no foreseeable impact on Departmental operations.

W.A. STANLEY, Captain
Commander
West Valley Area

RESPONSE TO COMMENT 4A.1

As noted above, the California Highway Patrol does not foresee any impacts to its service capabilities from the proposed project. Hillcrest Christian School does not currently employ, nor does it anticipate implementing in the foreseeable future, a school bus transportation program.

COMMENT LETTER No. 5

Elizabeth J. Harris
Los Angeles Unified School District
P.O. Box 512298
Los Angeles, CA 90051
July 23, 2001
SUBJECT: HILLCREST CHRISTIAN SCHOOL & CHURCH EXPANSION PLAN

COMMENT 5.1

Dear Mr. Liao:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the above referenced project. The Los Angeles Unified School District's comments are addressed by impact category, in Attachments A and B.

Please do not hesitate to contact me at (213) 743-5086 if you have any questions about the District's comments.

Very truly yours,
Elizabeth J. Harris
Environmental Planning Specialist

EJH:al
Attachments
James Figueroa, Assistant Superintendent, Division of Adult & Career Education
Sarina MacMillan, Principal, Kennedy Adult School
Enrique Boull't. Deputy Director, Transportation Branch
David Jensen, CEQA Deputy Director Site Assessment
Art Purcell, CEQA Manager
Robert Manford, CEQA Environmental Planning Specialist

ATTACHMENT A

INTER-OFFICE CORRESPONDENCE

Los Angeles Unified School District

TO: Elizabeth Harris
Environmental Planning Specialist

Date: July 16, 2001

FROM: Robert Manford
Environmental Planning Specialist

SUBJECT: **HILLCREST CHRISTIAN SCHOOL & CHURCH WEST CAMPUS EXPANSION PLAN**

COMMENT 5.2

Thanks for the opportunity to review the Air Quality and Noise sections of the Draft EIR for the above-mentioned project. The District's facility that is nearest to the location of the project site is Rinaldi Adult Center, which is located at 17450 Rinaldi Street in Granada Hills. The District's facility is located to the south of the project site, and is separated from the subject site by Rinaldi Street.

RESPONSE TO COMMENT 5.2

This comment identified the LAUSD Adult School facility located at 17450 Rinaldi Street. The LAUSD Adult School site is located directly to the south of the existing East Campus, as depicted by the PF-1 (Public Facilities 1) Zone District shown in Figure IV.G-1 on page 152 of the Draft EIR. The following comments and responses address specific issues of concern relating to this LAUSD Facility.

COMMENT 5.3

Air Quality

The Draft EIR adequately analyzes the project's air quality impacts to the environment. With implementation of the mitigation measures identified in pages 95-96 of the EIR, the proposed project would not result in air emissions that would adversely impact the Rinaldi Adult School.

RESPONSE TO COMMENT 5.3

This comment acknowledges that the LAUSD Environmental Planning Specialist has reviewed the air quality analysis in the Draft EIR and has concluded that all air quality impacts were adequately discussed. No response is required.

COMMENT 5.4

Noise

Staff is concerned about the proposed project's potential construction noise impacts on the Rinaldi Adult Center. However, project compliance with City Noise Ordinance and implementation of the mitigation measures identified on pages 185-186 would be adequate in reducing construction noise impacts to acceptable levels.

cc: Dave Jensen
Art Purcell
Ray Dippel

RESPONSE TO COMMENT 5.4

This comment acknowledges that the LAUSD Environmental Planning Specialist has reviewed the noise impact analysis in the Draft EIR and has concluded that with implementation of the mitigation measures identified on pages 185 and 186 of the Draft EIR, construction noise impacts could be reduced to a less than significant level.

ATTACHMENT B

INTER-OFFICE CORRESPONDENCE

LOS ANGELES UNIFIED SCHOOL DISTRICT

Raymond Dippel,

TO: Assistant Environmental Planning Specialist
Environmental Health and Safety

Date ;July 10, 2001

FROM: Enrique Boull't
Deputy Director/Transportation Branch

SUBJECT: **ENVIRONMENTAL IMPACT RESPONSE**
Hillcrest Christian School & Church DEIR
Near Rinaldi Adult Center

COMMENT 5.5

The following are the environmental impact concerns and the mitigation measures necessary to address the related issues for transported students and bus routes near **Rinaldi Adult Center.**

I OVERALL IMPACT

This project offers some potential to impact school transportation and the safety of student pedestrians near the location.

Current Bussing Patterns Near the Site:

- Fourteen (14) integration buses stop to load students at six (10) school bus stops within a ten (10) blocks from the proposed site.
- Special education buses also travel through and make borne pick ups in this area.

RESPONSE TO COMMENT 5.5

This comment identifies LAUSD transportation and bussing activities in the project area that could be impacted by the proposed project. Hillcrest Christian School and Church does not operate a bussing transportation program.

COMMENT 5.6

II. **ENVIRONMENTAL IMPACTS**

ON SCHOOL TRANSPORTATION

During Construction:

- During any construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
- Some streets in area are narrow and may be easily blocked by large equipment.
- Some additional costs to the District for additional drivers' time generated by routing delays or diversions.
- Rough street surfaces may be caused by excavations for laying of additional utility hookups.

RESPONSE TO COMMENT 5.6

As indicated in the Draft EIR, development of the project will require the export of approximately 77,500 cubic yards of soil during the phased construction process. The truck traffic may interfere with morning and afternoon commute times and may delay school bus schedules. The mitigation measures listed below in Response to Comment 5.10 will be incorporated into the Final EIR to address these concerns. With implementation of the recommended mitigation measures, construction of the proposed project would have a less than significant impact on LAUSD school transportation services in the local area.

COMMENT 5.7

After Opening:

- Stops in the area are long standing and Los Angeles USD has limited options for replacement of these stops and for rerouting in the area.
- We agree that increased student pedestrian crossing activity at Rinaldi St and Shoshone Ave. will increase potential conflicts foe [sic] bus drivers and other motorists.

RESPONSE TO COMMENT 5.7

Section IV.J.1, Traffic of the Draft EIR addresses potential impacts associated with increased student activity at the corner of Shoshone Avenue and Rinaldi Street. As stated in the Draft EIR, Hillcrest School will incorporate pedestrian safety measures into their standard daily operating procedures. With implementation of the required mitigation measures, project impacts on pedestrian safety would be less than significant. These measures are addressed on pages 230 and 232 of the Draft EIR.

COMMENT 5.8

ON STUDENT PEDESTRIANS

During Construction:

- Additional dangers to student pedestrians may occur from staging of trucks along streets near the project and increased truck traffic.
- Access to the construction site may expose student pedestrians to unexpected dangers.
- Trucks and equipment may draw the attention of students who may not respond appropriately to the excitement of construction activity.

After Opening:

- Increased dangers to bus passenger/student pedestrians from vehicles entering/exiting the new school driveways.
- Additional vehicular traffic during morning traffic patterns may impact buses loading at bus stops on Rinaldi St at Balboa Blvd. and at Louise Ave.

RESPONSE TO COMMENT 5.8

Impacts to student pedestrians are addressed in Section IV.J.1, Traffic of the Draft EIR on pages 228 and 229. Mitigation measures to minimize potential traffic/pedestrian conflicts are recommended on pages 230 and 232. Additionally, in Section IV.I.1, Police Protection of the Draft EIR, mitigation measures were recommended to employ the use of security guards to monitor and patrol the project site during project construction and operation (see Draft EIR, page 191). With implementation of these mitigation measures, impacts upon student pedestrian safety would be reduced to a less than significant level.

COMMENT 5.9

OTHER CONSIDERATIONS

- Because of recent changes to the vehicle code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop.
- Because of the nearness of the bus stops, trucks and construction equipment may encounter concentrations of student pedestrians.

RESPONSE TO COMMENT 5.9

It is assumed that all construction personnel are fully informed of new changes to the vehicle code with regard to yielding to busses using red-flashing lights. As discussed below in Response to Comment 5.10, additional safety mitigation measurers will be incorporated in to the Mitigation Monitoring and Reporting Program of the Final EIR. With implementation of these additional mitigation measures, potential impacts upon student safety and traffic/pedestrian conflicts will be reduced to less than significant levels.

COMMENT 5.10

III **ADDITIONAL MITIGATION MEASURES REQUESTED**

PRIOR NOTICE

- ☐ The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for the various portions of the project that may affect traffic through the areas.

TRAFFIC MANAGEMENT

- ☐ Contractors to avoid staging trucks and equipment along streets in the area to facilitate the movement of buses during peak traffic hours.
- ☐ Contractors to provide flag-men to assist traffic when moving trucks and/or heavy equipment on/off the proposed site.
- ☐ When possible, avoid heaviest construction traffic between the hours of 6:30 a.m. to 8:00 a.m. and between 3:30 p.m. and 4:30 p.m. to minimize delays to the arrivals and departures of buses and encounters with student pedestrians.
- ☐ Time spacing of portions of the project to minimize traffic flow impacts.
- ☐ Contractors to restore road and sidewalk smoothness to reasonably mitigate the roughness of the ride for transported students.
- ☐ Improvement of the intersections with ATSAC/ATCS should enhance safety of all crossing students with minimal delays for other traffic.

STUDENT SAFETY

- ☐ Contractors to provide temporary fencing at the construction site to deter entry of student pedestrians.
- ☐ Contractors to restore affected street and sidewalk surfaces to reasonable smoothness to minimize the potential for bus accidents and trip & fall injuries to student pedestrians.
- ☐ The Los Angeles Unified School District will evaluate special education bus stops in the area for possible routing alternatives and will modify integration routing if necessary.
- ☐ Hillcrest Christian School should provide instruction to its student pedestrians to enhance safety while moving between campuses.

- Los Angeles Unified School District will evaluate the issues of continued safety of stops on Rinaldi St at Louise Ave and Balboa Blvd.

OTHER CONSIDERATIONS

- Contractors to remind their drivers of construction vehicles of the requirement to stop for the red flashing lights of any school bus.
- Contractors to remind drivers to be alert to the presence of many child pedestrians and exercise care.
- Contractors should notify drivers that the presence of traffic signals, crossing guards and/or school zone flashing lights do not exempt school buses from using the red flashing lights.
- Contractors should notify drivers and workers to be cautious of student pedestrians in the area during peak hours.
- Contractors to be aware that the presence of any traffic light, crossing guard or school zone flashing lights do not guarantee that student pedestrians will act appropriately when crossing streets.

Thank you for your attention and diligence to this important issue. If you have any further questions or concerns, please feel free to contact me.

AA: ala
C: A. Rodriguez
A. Altieri
M.Young
W. Snyder

RESPONSE TO COMMENT 5.10

Even though the potential impacts in the area of traffic, pedestrian safety and circulation were already reduced to a level below significance, the above requested mitigation measures have been incorporated in to the Final EIR. See Section II, Corrections and Additions and Section IV, Mitigation Monitoring and Reporting Program.

COMMENT LETTER No. 6

Jerry M. Smith
Southern California Association of Governments (SCAG)
818 West Seventh Street
12th Floor
Los Angeles, CA 90017-3435
July 18, 2001

RE: SCAG Clearinghouse 120010389 Hillcrest Christian School and Church West Campus Expansion Plan

Dear Mr. Liao:

COMMENT 6.1

We have reviewed the above referenced document and determined that it is not regionally significant per Areawide Clearinghouse criteria. Therefore, the project does not warrant clearinghouse comments at this time. Should there be a change in the scope of the project, we would appreciate the opportunity to review and comment at that time.

A description of the project was published in the **July 15, 2001** Intergovernmental Review Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1867.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

RESPONSE TO COMMENT 6.1

SCAG has determined that the proposed project is not regionally significant per Areawide Clearinghouse Criteria. SCAG has not raised any questions of concerns regarding the adequacy of the environmental review process.

COMMENT LETTER No. 7

Edwin F Lowry, Director
Department of Toxic Substances Control
1011 N. Grandview Avenue
Glendale, CA 91201
August 31, 2001

COMMENT 7.1

DRAFT ENVIRONMENTAL IMPACT REPORT, PROPOSED HILLCREST CHRISTIAN SCHOOL AND CHURCH WEST CAMPUS EXPANSION PLAN, LOCATED AT 17531 RINALDI STREET, GRANADA HILLS, LOS ANGELES COUNTY, CALIFORNIA SCH # 2000061095

Dear Mr. Liao:

The Department of Toxic Substance Control (DTSC) has reviewed the Draft Environmental Impact Report (EIR), dated June 21, 2001, for the subject project. The Draft EIR was received from the State Clearinghouse on June 27, 2001. The due date to submit comments was August 6, 2001.

Although the due date has passed, DTSC would like to provide the following comments for your consideration:

RESPONSE TO COMMENT 7.1

As indicated, this comment letter was received after the close of the public comment period. However, it will be accepted and addressed as part of the Final EIR. Responses to DTSC's comments are provided below.

COMMENT 7.2

1. Since the Site was used for agriculture operations from 1940 to at least 1962, impacts by the pesticides (such as DDT and DDE) and /or fertilizers (usually containing heavy metals) are expected. These agricultural chemicals, commonly used in past farming operations, are persistent and bio-accumulative toxic substances. Therefore, completion of a Preliminary Endangerment Assessment (PEA), in accordance with DTSC's "Interim Guidance for Sampling Agricultural Soils at Proposed School Sites", is recommended for this site. The PEA is to determine whether a release or threatened release of hazardous materials or whether the presence of a naturally occurring hazardous material, which may pose a threat to public health or the environmental, exists at the site.

RESPONSE TO COMMENT 7.2

The Department of Toxic Substances Control (DTSC) Interim Guidance for Sampling Agricultural Soils (June 28, 2000) states that the DTSC is responsible for evaluating environmental assessments for proposed school sites *that will receive state funding* for acquisition and/or new construction. The proposed Hillcrest Christian School and Church is a privately funded school project and will not involve any federal, state or local government funding. Therefore, there is no legal requirement for Hillcrest to conduct a PEA investigation nor submit to any DTSC regulatory oversight.

Notwithstanding the above, in researching this issue it was discovered that a Phase I Environmental Site Assessment Report and Updated Phase I Environmental Site Assessment Report were prepared by Ami Adini & Associates, Inc. The Phase I Environmental Site Assessment was conducted for the West Campus property in 1997 and revised in 1999 as part of the applicant's real estate transaction. The existence of these documents were not known to the EIR consultants at the time the EIR was being prepared. Thus, neither the Phase I (1997) or revised Phase I (1999) report were included within the Draft EIR.[1] The findings and conclusions of these documents will be incorporated into the Corrections and Additions Section of the Final EIR, as appropriate, and both documents will be appended, herein, s part of the Final EIR.

The Phase I Environmental Site Assessment Report (1997) documented the historical research of the property back to 1928 where it appears to have been used residentially and agriculturally. The Phase I Report found that no pesticides or herbicides were observed being stored or used at the subject property. The Phase I concluded that "Although there is evidence that the site was used for agricultural purposes in the past, time has reduced the potential for any residual chemicals to still remain in the soil." Additionally, as documented in the Historic Resources Section of the EIR, the subject property was subdivided and converted to residential home sites in the early 1940s. This is the same time insecticides such as DDT became prevalent in agricultural practices. Thus, agricultural activities on the site prior to the early 1940s are not likely to have employed pesticides on site. Therefore, given the documented history of the site and the conclusions of the two Phase 1 Reports conducted on the subject property, potential hazards associated with pesticides would be less than significant. Accordingly, a PEA investigation is not warranted.

COMMENT 7.3

2. Due to construction date of the on-site historic structures, it is likely that they contain lead-based paint and/or asbestos-containing material (ACM). DTSC recommends that these environmental conditions be investigated and possibly mitigated, in accordance with DTSC's "Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed School Sites".

[1] The Updated Phase I Environmental Site Assessment concluded that no other changes or environmental concerns or impairments were observed on the subject property that were not addressed in the previous Phase I Environmental Site Assessment Report performed by Ami Adini & Associates, Inc. dated October 23, 1997.

RESPONSE TO COMMENT 7.3

Risks associated with asbestos containing materials and lead based paint were addressed in the Draft EIR in Section IV.K, Risk of Upset (see Draft EIR, page 243). The Draft EIR includes mitigation measures to the same effect as this comment, that the site be investigated and mitigated, should such potentially hazardous materials be found to exist on site. The mitigation measures state that abatement procedures shall be in compliance with all applicable federal and state rules and regulations pertaining to ACMs and lead-based paint. Compliance with DTSC's Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed Schools Sites was therefore implied. To clarify DTSC's request, the following language will be incorporated into the mitigation measures for Risk of Upset: "including the Department of Toxic Substances Control "Interim Guidance for Evaluating Lead-Based Paint and Asbestos-Containing Materials at Proposed Schools Sites"."

COMMENT 7.4

3. Since it is school site related, you may want to have the project reviewed by DTSC under the School Property Evaluation and Cleanup Program authorized by AB 387, SB 162, and AB 2644. If the project proponent elects to conduct a PEA at the site, it shall enter into an Environmental Oversight Agreement (EOA) with DTSC to oversee the preparation of the PEA.

RESPONSE TO COMMENT 7.4

As discussed above, since the Hillcrest Christian School and Church is not receiving any state funds for this project, there is no legal requirement for Hillcrest to conduct a PEA investigation nor submit to any DTSC regulatory oversight. Notwithstanding the legalities of DTSC involvement, given the documented history of the site and the conclusions of the two Phase 1 Reports conducted on the subject property, potential hazards associated with pesticides would be less than significant. Accordingly, a PEA investigation is not warranted. See Response to Comment 7.2 above.

COMMENT 7.5

DTSC is also administering the $85 million Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. The program is composed of two main components: low interest loans of up to $100,000 to conduct Preliminary Endangerment Assessments of underutilized properties; and loans of up to $2.5 million for the cleanup or removal of hazardous materials also at underutilized urban properties. These loans are available to developers, businesses, schools, and local governments.

For additional information on the EOA or CLEAN Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 551-2860.

RESPONSE TO COMMENT 7.5

This comment does not address the adequacy of the DEIR; therefore, no response is required per Section 15204 of the CEQA Guidelines. However, the information provided is very much appreciated.

COMMENT LETTER No. 8

Alexander M. Man
The Federations of Organizations (FOCUS)
P.O. Box 171F [illegible]
Santa Monica, CA [zip illegible]
August 6, 2001

COMMENT 8.1

THE FEDERATIONS OF ORGANIZATIONS FOR CONSERVING URBAN SPACE (FOCUS) HAS REVIEWED DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HILLCREST CHRISTIAN SCHOOL EXPANSION PLAN. FOCUS HAS DETERMINED THAT DUE TO ERRORS, OMISSIONS AND MISREPRESENTATIONS OF FACT, DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARING HOUSE NUMBER 2000061095, IS NOT IN COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT.

ERRORS IN ABOVE REFERENCED DRAFT ENVIRONMENTAL IMPACT REPORT:

RESPONSE TO COMMENT 8.1

We respectfully disagree with this assertion, as there are no changes or corrections to the Draft EIR that constitute significant or substantial changes that would necessitate re-circulation of the Draft EIR in accordance with CEQA Guidelines Section(s) 15088 or 15088.5. As indicated in the following Responses to Comments 8.2 to 8.9, below, no changes to the Draft EIR have been presented that would increase the projects environmental impacts to significant levels. In fact, any project changes or clarifications presented as Corrections and Additions to the Draft EIR would result in reducing project impacts. As such, recirculation of the Draft EIR is not required pursuant to CEQA.

COMMENT 8.2

1) trees on north side of proposed project are incorrectly listed in biological assessment section as “pine trees”. Examination of trees has identified them as Tamarix trees.

RESPONSE TO COMMENT 8.2

During the preparation of the Draft EIR, the site was surveyed by two professional landscapers (i.e., Tuckers Tree Works and James Dean Landscape Architects) and a team of ecologists (i.e., Teracor Resource Management). 207 non-oak trees were identified, and recorded on the property. Of the 207 trees, only 118 were classified as desirable pursuant to the City's Landscape Ordinance. The survey reports included mapped tree numbers identifying specific tree species and their locations. The commentator's assertion is vague in the fact that it does not identify which tree numbers have been incorrectly identified. Upon further review of the site, the pine trees identified along the northern limits of the property along Ridgeway Road have been confirmed to be Canary Island Pines (*Pinus Canariensis*), as correctly stated in the Draft EIR. Furthermore, the species Tamarix is an invasive species that offers no biological value to the project site. Tamarix trees have four main impacts on the local environment once they become established: (1) increased soil salinity, (2) increased water consumption, (3) increased wildfire frequency, and (4) increased frequency and intensity of flooding (Wiesenborn 1996). As such, they are afforded no protective status by federal, state or local regulations, ordinances, or conservation plans.

COMMENT 8.3

2) Number of trees to be removed as listed in biological assessment section of DEIR is not 202. Correct total number of trees to be destroyed is 295 mature trees.

RESPONSE TO COMMENT 8.3

Page 100 of the Draft EIR stated a total of 207 non-oak trees were identified on the West Campus property. As mentioned previously the site has been assessed and surveyed by two professional landscapers (i.e., Tuckers Tree Works and James Dean Landscape Architects) and a team of ecologists (i.e., Teracor Resource Management). While the commentator disputes the actual number of trees recorded on the property, no evidence or argument to support this conclusion is provided.

COMMENT 8.4

3) Biological assessment letter from Vance V. Tucker, dated October 26, 1998 incorrectly describes 78 trees along Shoshone avenue as a "hedgerow". Personal examination of "casuarina equisetifolia" trees revealed that they are large mature trees, as shown in view no. 7, figure IV.A-5 at page 62 Draft Environmental Impact Report (DEIR).

RESPONSE TO COMMENT 8.4

The classification of the "*casuarina equisetifolia*" trees as a hedgerow was used to identify the trees mapped and recorded along the west side of Shoshone Avenue. The photograph depicted in Figure IV.A-5 on page 52 of the Draft EIR clearly depicts larger mature Deodar Cedar trees and Canary Pine trees standing tall above the project site in the background. The hedgerow stand, described by Tucker's Tree Work's in Appendix C of the Draft EIR, is concealed by the line of cars parked along Shoshone Avenue.

COMMENT 8.5

Omissions of information essential to factual integrity of DEIR:

1) Potential electrical energy demands of new school buildings are not provided in draft environmental impact report, as required by city CEQA and environmental assessment regulations.

RESPONSE TO COMMENT 8.5

The energy demands of the proposed project were addressed and properly disclosed in Section V.A, Impacts Determined to be Less Than Significant. As stated on page 252 of the Draft EIR, the electricity demands of the proposed project were estimated at approximately 2,158 kWh per day. Based on the City of Los Angeles Department of Water and Power's current supply of electricity and the projection estimated contained in the City's General Plan Framework Element, the electricity demands of the project were identified early on in the environmental review process as a less than significant issue. As such, additional analysis was not warranted.

COMMENT 8.6

2) Existing, 295 shade trees on project site are currently providing substantial amount of cooling shade to project site and are also cooling air in adjacent residential areas. Scientific studies show that a mature tree provides approximately 1 million British thermal units of cooling energy through transpiration-environmental process. Destructive impacts to energy conservation provided by existing trees on project site is not included in biological assessment section of Draft Environment Impact Report of Hillcrest Christian School & Church West Campus Expansion Plan.

RESPONSE TO COMMENT 8.6

The project's impacts on the loss of trees and effects of heat attenuation are addressed in the Biological Resources Section of the Draft EIR. Specifically, the Draft EIR states:

> "In addition to meeting the tree replacement requirements, the proposed Landscaping Plan will meet all of the general goals of the Landscape Ordinance. Such goals include conserving energy and reducing heat attenuation in the parking lot." (See Draft EIR Page 104).

> "The Chinese Pistache is a deciduous species that typically grows to a height of 25 to 35 feet. As such, these species are suitable to provide ample shading and heat attenuation in the parking lot." (see Draft EIR, page 106).

The proposed tree replacement program and mitigation measures presented on pages 108 to 109 of the Draft EIR will provide adequate tree cover to provide shade attenuation in the parking lot area and along side the proposed education building. In total, 162 trees will be planted throughout the project site, including 140 non oak trees (24-inch box size) and a minimum of 22 oak trees (48" box size). As such, shade will be provided and a less than significant impact would occur.

COMMENT 8.7

3) Air quality analysis omitted fact that cut and fill soil removal during grading operations may release fungus that carries "valley fever' into air of residential areas adjacent to proposed project.

RESPONSE TO COMMENT 8.7

The air quality analysis includes an analysis of the five criteria pollutants in accordance with the rules and procedures outlined by the SCAQMD Air Quality Handbook (1995). The evaluation of various fungi and other airborne contaminants beyond those identified by the SCAQMD's standard reporting requirements would be excessive and unwarranted unless substantial evidence was provided that otherwise warrants additional evaluation. No such evidence is presented, thus this issue is not required to be addressed. It is acknowledged that broad occurrences of valley fever may have been invoked by the 1994 Northridge earthquake, when a rather large area within the greater San Fernando Valley and outlying areas was subject to severe (magnitude 7.2) ground disturbance. Typically, grading activities for construction projects the scale of the proposed project (i.e., a total of approximately 5.5 acres) do not pose a threat to nearby residents or construction workers with regard to valley fever.

COMMENT 8.8

4) Level of soil compaction planned during and after cut and fill work is not provided in geotechnical or hydrology sections of above referenced draft environmental impact report.

RESPONSE TO COMMENT 8.8

The geotechnical Section of the Draft EIR (See Section IV.D), stated the Initial Phase grading would require approximately 35,000 cubic yards (cy) of cut and 7,000 cy of fill with a total soil export of 28,000 cy. The final phase was reported to involve 62,000 cy of cut and 12,500 cy of fill with a soil export of 49,500 cy. These numbers were provided by the project applicant's Civil Engineer, B&E Engineers. The mitigation measures included in the Draft EIR provides that the grading for the project shall conform to the recommendations made in the project's geotechnical report prepared by GeoSystems, Inc. The geotechnical report states that all conventional foundations bearing in bedrock or certified compacted fill are proposed for structural support.

COMMENT 8.9

Factual misrepresentation in draft environmental impact report:

1) Correct number of cubic yards of soil surplus to be hauled off project site not provided in hydrology or geotechnical sections of above referenced draft EIR.

Amount of soil surplus to be hauled off construction site will be approximately 77,000 cubic yards. Not 49,500 cubic yards as stated at page 13 "geological hazards". That large difference will result in longer periods of truck traffic in residential neighborhoods next to project site, and possibly creating extended traffic tie ups in neighborhoods through which trucks will pass during the haul-out of surplus soil from proposed project.

Sincerely,

RESPONSE TO COMMENT 8.9

The Geotechnical Section of the Draft EIR (See Section IV.D) stated the Initial Phase grading would require approximately 35,000 cubic yards (cy) of cut and 7,000 cy of fill with a total soil export of 28,000 cy. The final phase was reported to involve 62,000 cy of cut and 12,500 cy of fill with a soil export of 49,500 cy. It appears that the commentator has combined the estimated amount of soil export for each phase of construction and combined them for a rounded approximate amount of 77,000 cy of soil export. Whether both amounts of soil are counted together or separately, the correct amount of total soil export is disclosed and would result in the same amount of haul truck trips. The separate discussion between the Initial Phase and the Final Phase was used to describe the proposed construction schedule and disclose the fact that the two phases would not occur concurrently.

COMMENT LETTER No. 9

Mary Edwards
North Valley Coalition
11862 Balboa Blvd.
Box 172
Granada Hills, CA 91344
Received August 8, 2001

Re: (CUZ) (ZV) EIR ZA99-0421/ZA99-0836

COMMENT 9.1

The North Valley Coalition would like to comment on a few of the concerns we have regarding the expansion of the Hillcrest Christian School in Granada Hills.

Parking: Providing only 262 additional parking spaces, instead of the 433 required, seems unacceptable. In view of the increase of 400 students, the demand for parking for faculty support staff and students will exceed the schools ability to provide parking. It is only realistic to assume that many of the students will drive themselves to school, as is the case with the neighboring high schools where parking is an ongoing problem.

RESPONSE TO COMMENT 9.1

The minimum code required parking for the West Campus is 286 parking spaces, not 433 as asserted by the commentator. The project proposes to provide 124 spaces on the West Campus. Combined with the available parking areas on the East Campus, up to 272 parking spaces will be made available on a daily basis. A parking demand analysis for the proposed project was prepared and presented in Section IV.J.2 of the Draft EIR. As part of this analysis, it was assumed that school administrators would control the amount of high-school drivers that would be allowed to drive to school. As provided by the mitigation measures on page 242 of the Draft EIR, the applicant will be required to limit student driving by providing limit parking passes for a maximum of 56 parking spaces. Under this approach, the school has the ability to control the parking demand to ensure adequate parking supply is available for staff, administrators, and visitors.

Furthermore, it should be noted that the code required parking for high schools is based on maximum attendance at the theater or gymnasium building. The use of the gymnasium building to its full capacity would not be a part of daily operations. Rather, such use would be reserved for school events involving parent attendance such as basketball or volleyball games, award ceremonies or school presentations. Under this scenario, and the more conservative assumption that the gymnasium could accommodate 1,000 people with 2.5 people per car, a total of 400 parking spaces was estimated to be required. Hillcrest has demonstrated that it could provide up to 402 parking spaces on a temporary

basis, as the need arises, by parking cars on a designated overflow parking area on the northern athletic field of the East Campus. As such, the code required parking demand would be met during peak parking demand times.

COMMENT 9.2

Traffic: Balboa Blvd. is projected in the General Plan to become the most congested artery in the north valley, with some intersections reaching LOS F. This will force traffic on to the only other parallel streets that connect with Rinaldi, namely Louise and Shoshone. Even without the expansion, the traffic on residential streets will be impacted by the many, already approved, projects in Santa Clarita and Porter Ranch and may very well reach absolute gridlock.

RESPONSE TO COMMENT 9.2

The before and after project traffic conditions for Louise and Shoshone Avenues were analyzed in the Draft EIR. See page 223 for a table summary of project traffic impacts. As indicated in Table IV.J.1-10, on page 223 of the Draft EIR, the LOS and VC ratios at Louise and Shoshone are projected to be improved with implementation of the project with the implementation of mitigation measures as compared to pre-project traffic conditions without the proposed project in the year 2005. All future traffic estimates reflect a worst case scenario, and include a future year traffic growth rate of 2% per year, together with additional traffic volumes generated by related projects. Thus, all traffic projections account for regional growth. It is anticipated that the traffic mitigation improvements that are proposed under this project would help to alleviate traffic congestion in the project vicinity and would improve roadway circulation. With implementation of the required mitigation measures identified in the Draft EIR, traffic impacts during the AM and PM peak hour periods would be less than significant.

COMMENT 9.3

Historic Buildings: The unfortunate destruction of the Sunshine Ranch House, by a previous congregation that proposed a church for the contemplated site, destroyed the oldest building in Granada Hills. All that remains are the bunk houses that are now the oldest buildings and are now also destined for destruction. These should be moved and preserved, as part of the history of the community. Will the applicant consider this proposal?

RESPONSE TO COMMENT 9.3

As discussed in Section IV.E. Historic Resources of the Draft EIR, the residences at 11515 Shoshone Avenue and 11525 Shoshone Avenue are not considered historic resources as they lack the physical integrity requisite for listing in the California Register. As such, the demolition of these structures would not be considered a significant impact. Because the two structures located at 11515 and 11525 Shoshone Avenue did not meet the historic eligibility criteria, the applicant is not considering any

relocation plans for these structures. The residential structure identified at 17551 Rinaldi Street, however, is eligible for listing in the California Register as a historic resource under Criteria A. This structure is also potentially eligible for designation as a Los Angeles Historic-Cultural Monument. The Hillcrest Christian School has continued to pursue the relocation method as a way to reduce the project's historic impact to a less than significant level. Through continued discussions with the SFVHS, a mitigation plan to relocate this structure has been formalized and agreed between both parties. See Topical Response 3 on page 28.

COMMENT 9.4

Night Activities: The proposed project is in a residential community and the peace and tranquility of the neighborhood must be preserved. No exterior nighttime activities, particularly athletic events, should be allowed at the expanded campus. Will the applicant guarantee that the neighbors will not be subjected to nighttime events?

RESPONSE TO COMMENT 9.4

Nighttime athletic events are not proposed as part of the project's operations. Other than minimal security lighting features, no outdoor lighting is proposed anywhere on the campus. In the absence of field lighting, no nighttime events would be held on the West Campus athletic field. Some events, such as Open House events or other events, including athletic events, may be held in the gymnasium after school hours and extend into the early evening hours. Such activities, however, are currently being provided on the existing East Campus, and relocating gymnasium activities to the West Campus would not impact the adjacent residents because such activities would be held indoors.

COMMENT 9.5

Land Use: It would be refreshing if the Community Plans that were adopted through hearings and neighborhood input would be treated as something more than meaningless, bothersome paperwork, to be changed at the whim of the ZA or the Council. Those of us who sat through these session in the mid-ninety's recommended that buildings over two stories not be permitted in this extremely active earthquake area. We had observed how badly these higher buildings had performed in the two earthquakes. This area has demonstrated, beyond question, its susceptibility to earthquake damage and caution should be a given. To put children at risk is simply unacceptable. What measures will be take to make the structure earthquake proof?

RESPONSE TO COMMENT 9.5

The West Campus property has undergone an extensive geotechnical feasibility investigation by GeoSoils Inc. The results of their investigation is included in Section IV.D. Geotechnical Hazards of the EIR. As discussed in this analysis, the site is feasible for development from a geotechnical standpoint. Project design and construction will be implemented to resist ground motions and the

associated ground accelerations, in conformance with current building code requirements as required by the City of Los Angeles Department of Building and Safety, will reduce potential seismic hazards to a less than significant level. Impacts associated with fault rupture hazards are therefore considered to be less than significant.

COMMENT 9.6

Loss of Trees: We are concerned that many mature trees that serve to buffer noise and clean the air will be lost, as a result of the project. What plans does the proponent have for mitigating this substantial loss?

Thank you for the opportunity to comment.

Sincerely,

RESPONSE TO COMMENT 9.6

The tree mitigation plan is outlined on pages 108 and 109 of the Draft EIR. These mitigation measures are also incorporated into Section IV. of the Final EIR Mitigation Monitoring and Reporting Program.

COMMENT LETTER No. 10

Aziz Larbaoui
Shoshone/Mayerling Homeowners Association
17634 Mayerling Street
Granada Hills, CA 91344
August 6, 2001

Dear Mr. Liao:

COMMENT 10.1

I, Aziz Larbaoui, am President of The Homeowners Association of the 10 new Homeowners at the Shoshone/Mayerling location.

This letter is to strenuously protest the proposed project. This is a residential neighborhood. We don't want to come to regret that fact that 10 families purchased a noise hazard for the next 30 years and more. Each houses costing around the mid-6 figures and hearing these noises 10 months out of each year. You cannot clearly be approving such proposal and you know all the violations by now with this project. No need to repeat it to you. As our attorney is reviewing this project, you should be soon in contact. There are already five schools around us. No residential area should have to deal with this level of traffic. This proposal will make it worse.

Please do consider our complaint as it clearly is not beneficiary to our neighborhood but this school's Greed only.

If you have further questions, call us or e-mail or write, thank you!

Sincerely,

RESPONSE TO COMMENT 10.1

This commentator's opposition to the proposed project is noted for the record and will be forwarded to the Decision-Maker for their consideration.

The noise impacts from the proposed project are addressed in Section IV.H, Noise, of the Draft EIR. As discussed in the Draft EIR, operation of the proposed project is not expected to result in any significant operational noise impacts. Construction noise levels will be reduced to a level of less than significant with implementation of the recommended mitigation measures provided on pages 185 and 186 of the Draft EIR.

Traffic impacts are discussed in Section IV.J.1 of the Draft EIR. As concluded in the project traffic analysis, with implementation of the required traffic improvements mitigation measures, traffic impacts would be reduced to less than significant levels.