



SITE OPTION # 1A

SOUTH REGION HIGH SCHOOL # 4
Los Angeles Unified School District



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CITY OF LONG BEACH

DEPARTMENT OF PLANNING AND BUILDING

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May 23, 2006

Jessica Rappaport
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Office of Environmental Health and Safety
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Los Angeles, CA 90071

**RE: Comments on Draft Environmental Impact Report
Proposed South Region High School No. 4
State Clearinghouse No. 2005041116**

Dear Ms. Rappaport:

The City of Long Beach has reviewed the Draft Environmental Impact Report (EIR) on the proposed South Region High School No. 4 for the Los Angeles Unified School District (LAUSD) and has the following comments to provide in accordance with Section 15086 of the California Environmental Quality Act (CEQA) Guidelines. The City of Long Beach is identified as a Responsible Agency on page 2.16 of this EIR as defined by both Public Resources Code Section 21069 and CEQA Guidelines Section 15381.

Issues Not Analyzed in EIR

The following environmental issues were not adequately addressed in the EIR to meet minimal compliance with CEQA requirements.

Land Use and Planning

There is no Land Use analysis chapter. The local General Plan Land Use Element and Zoning Code designations are only briefly discussed on page 2.9 of the Project Description chapter. It is acknowledged in the EIR that elementary and secondary schools are not identified as permitted uses in the project site zoning district (IM, Medium Industrial).

The project will remove an economically productive property from future industrial uses. Furthermore, as noted on page 3A.16 of the EIR, South Coast Air Quality Management District (SCAQMD) Rule 1401.1 "restricts the types of permits that can be granted within 1,000 feet of an existing school." The EIR confirms that "the new school may restrict the potential use of industrial property." This 1,000 foot restriction would therefore take in properties located south of Carson Street that are currently zoned IM Medium Industrial, as well as properties east of the Union Pacific railroad track that are in the West Long Beach Business Parks Planned Development District (PD-26), a special zoning district that permits light industrial and warehousing uses. This SCAQMD Rule could also have a ripple effect on nearby industrial

properties outside of this 1,000 foot restriction area by driving away existing and potential businesses that perceive a reduced industrial area as diminished in economic usefulness. The EIR does not discuss the project potential for adverse economic and fiscal impacts to the City of Long Beach as well as the negative impact to existing and future businesses due to this future limitation placed on industrial land uses in and around the project site.

Preservation of existing industrial properties is a primary goal for the City of Long Beach. Imposition of a school land use into a well established industrial area is contrary to continuing efforts by the City of Long Beach to protect and retain industrial jobs in the region.

The project site is also near land uses that are typically considered incompatible with a high school location:

- There is a Port operated cargo container storage land use (Harding Containers) on the south side of Carson Street opposite the southern boundary of the project site. This storage facility has a chain link fence with both barbed wire and razor ribbon abutting the sidewalk.
- East of the railroad track is a business and industrial park area (the PD-26 West Long Beach Business Parks Planning Development District) that permits manufacturing and warehouses uses.
- The intersection of Carson Street and Santa Fe Avenue contains a liquor store at the northwest corner, a gas station and mini-market at the southwest corner and a vacant lot at the southeast corner.

Given the impact of this project on future land use planning and economic growth in the surrounding industrial areas, the EIR should be recirculated to provide a full analysis of these issues in a Land Use chapter. This EIR land use impact analysis should include a full evaluation of any project conflicts with all applicable local and regional plans, policies and regulations, including, but not limited to, the following:

- Long Beach Zoning Code;
- Long Beach General Plan;
- Long Beach 2010 Strategic Plan;
- Long Beach Jobs and Business Strategy; and
- Regional Comprehensive Plan and Regional Transportation Plan by the Southern California Association of Governments (SCAG).

Cumulative Impacts

The City of Long Beach provided LAUSD with a comprehensive list of major projects proposed or currently under development in the project site vicinity for consideration in the EIR Cumulative Impact analysis. Unfortunately, the EIR reduced the Cumulative Projects list to only eleven projects located in Long Beach as shown in Table 2-1.

The EIR cumulative analysis must include all planned growth for the Ports of Long Beach and Los Angeles. Burlington Northern Santa Fe Railroad (BNSF) has proposed a near-dock facility, known as the Southern California International Gateway, which by BNSF estimates would increase capacity from under one million to 1.5 million containers annually. The City of Long

Beach provided comments to the Notice of Preparation for this project, in accordance with CEQA Guidelines Section 15082, on December 14, 2005. In addition, Union Pacific Railroad has proposed expansion of the Intermodal Container Transfer Facility (ICTF) that would increase capacity from 750,000 to over 1.6 million containers annually. Both of these projects are located by the Terminal Island Freeway/Sepulveda Boulevard intersection, which is just a couple miles south of this proposed high school site. This potential increase in truck volumes and accompanying air and noise impacts cannot be overlooked when assessing the cumulatively considerable environmental effects of this project with the reasonably foreseeable future growth in the surrounding industrial areas.

No criteria were provided in the EIR to justify this reduced cumulative projects evaluation list. The EIR must therefore be recirculated with a complete Cumulative Projects List and full analysis of whether the project's incremental effects would be considered cumulatively considerable given the full range of cumulative projects in accordance with CEQA Guidelines Section 15130. All reasonably foreseeable Port related projects must be included in the cumulative analysis.

Mitigation Monitoring Program

The EIR must include a Mitigation Monitoring Program pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097 in addition to the Summary of Mitigation Measures in Table ES-2 of the Executive Summary. This Program should clearly identify for each mitigation measure:

- The triggering event in the construction and/or operational phases of the project;
- The entity or public agency responsible for carrying out the mitigation measure;
- The required actions for completion of each mitigation measure; and
- The estimated duration of the mitigation measure and estimated date of completion.

Executive Summary

Nearby industrial uses are characterized as "light industrial" on page ES.1. The Port of Long Beach cargo container storage facility (Harding Containers) located on the south side of Carson Street directly opposite the project site and the Union Pacific rail line abutting the eastern boundary of the project site would be more accurately described as freight transportation uses than light industrial, an important distinction that reflects the incompatibility of a high school location at the edge of Port-related shipment activities.

This Executive Summary section should identify the following as required under CEQA Guidelines Section 15123:

- Areas of controversy known to the lead agency, including issues raised by agencies and the public; and
- Issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects

Chapter 2. Project Description

The EIR should provide the LAUSD criteria for determining this Target Search Area. The rationale given on page 2.1 was to relieve overcrowding at Carson and Banning High Schools. However, both high schools are located outside this Target Search Area. Banning High School is approximately two miles to the south and Carson High School is approximately one mile southwest of the Target Search Area.

The following questions need to be fully answered to provide an understanding into the evaluation standards and process applied in determining this Target Search Area:

- Why was a site at the extreme eastern edge of Carson neighborhoods chosen as the preferred site to serve Carson and Wilmington students when other alternative sites identified in Figure 2-1 are more centrally located in the Target Search Area?
- Why was this site chosen when the California Education Code sets forth Site Evaluation Standards that recommend against sites, such as this project site, that are within 1,500 feet of a pipeline carrying hazardous materials?
- What other existing high schools or school districts could adequately serve the Target Search Area without the need for a new high school?

Chapter 3A. Air Quality Impacts

Exposure of students and school employees to poor air quality is the primary concern for this environmental issue. The air dispersion models used in the Health Risk Assessment do not fully address asthma and other respiratory illnesses that current studies show to have more adverse effects in schools adjacent to industrial uses and transportation corridors.

The project site is located in the South Coast Air Basin, which is considered non-attainment for one hour ozone levels, PM₁₀, PM_{2.5}, and carbon monoxide. The EIR states on page 3A.17 that the project is expected to reduce emission levels through the reduction of vehicle miles traveled, and therefore with no proposed schools within a one-mile radius, the project would not contribute to cumulative air quality impacts. This line of reasoning appears flawed since morning and afternoon peak demand to the school could generate over 1,000 vehicle trips within this time frame assuming that most of the 57.7% student trips are by car as stated on page 3D.6 of the EIR. Further, these peak period vehicle trips would be concentrated in close proximity to the project site by a heavily traveled intersection (Santa Fe Avenue and Carson Street) that presently carries 25,000 cars per day (page 3D.1).

Not only would the project place a sensitive receptor land use close to industrial and railroad activities, the absence of on-site parking for students and visitors will increase vehicle miles traveled beyond direct destinations by forcing searches for off-site parking spaces. This will undoubtedly spill into the industrial areas east and south of the project site, resulting in truck and passenger vehicle conflicts in both parking and trip movement demands. Peak hour increases in traffic volumes will also create congestion along the major streets, resulting in trucks staying longer in the immediate project vicinity. Therefore, the project will worsen this area's poor air quality by adding more vehicle trips during peak periods, create searches for off-site parking spaces during the morning peak period that will unnecessarily add travel miles, create competition for off-site parking spaces in the industrial areas between trucks and

students/school visitors, and lead to delays in truck movements from project-generated traffic congestion, particularly at the Santa Fe Avenue/Carson Street intersection.

California Education Code Section 17211 states that each new or expanded public school site must be evaluated according to certain specific Site Evaluation Standards set by the State legislature and the State Department of Education. These standards include environmental considerations that would keep schools free from air pollution, dust and smoke. However, as shown on Table 4-1 of the EIR, the LAUSD Site Selection Criteria does not include air pollution as an environmental consideration. Not to consider air pollution effects on students and other school facility occupants is a serious oversight and in direct conflict with State law.

Given the project-generated air quality impacts from this direct increase in peak period traffic volumes, miles traveled and traffic delays, the following corrective actions are needed:

- The EIR must be recirculated to provide a full evaluation of cumulative air quality impacts from project-generated traffic volumes; and
- Since cumulative air quality impacts during morning and afternoon peak demand periods would appear to be cumulatively considerable, the EIR should identify project operations, and not just project construction, as an unavoidable adverse significant impact requiring approval of a Statement of Overriding Considerations prior to project approval.

The air quality analysis should also address the conclusions from the following recent studies in relation to project impacts:

- City of Long Beach Baseline Air Quality and Noise Human Health Risk Assessment, approved by the Long Beach City Council on May 24, 2005;
- SCAQMD MATES II; and
- California Air Resources Board study on diesel particulate matter exposure in the Ports (Diesel Particulate Matter Exposure Assessment for the Ports of Los Angeles and Long Beach, draft, October 2005)

Chapter 3B. Hazards and Hazardous Materials

Project Site Hazards

The proposed project site is located near the following industrial facilities and sites with potentially hazardous emissions that make this site unattractive and unsafe for school use:

- Figure 3B-1 provides the locations of eight potential hazardous release sources within one-quarter mile of the project site.
- Figure 3B-2 identifies a high-pressure crude oil pipeline and a high-pressure fuel pipeline that both abut the project site boundaries.
- A Union Pacific main railroad track abuts the eastern boundary of the project site with no wall or grade separation to prevent pedestrian access.
- A 55 kV Edison power line runs along the northern public right-of-way along Carson Street that abuts this project site.

The Site Evaluation Standards set forth in the California Education recommends that school districts avoid sites that are close to high voltage power lines or within 1,500 feet of a pipeline carrying hazardous materials. Under State law, school districts must make a written determination to the State Department of Education that a proposed school site is not located by any pipelines, situated underground or aboveground, which carry hazardous materials, substances, or wastes, unless the pipeline is used only to supply natural gas to the school or neighborhood.

The project site location therefore violates the State's Site Evaluation Standards. The following corrective action is needed:

- The recirculated EIR must explain the reasons why the LAUSD selected a project site that directly conflicts with the Site Evaluation Standards for new school sites.

Preliminary Environmental Assessment

A Preliminary Environmental Assessment (PEA) has been prepared for this project and is currently under review by the California Department of Toxic Substances Control (DTSC). A 30 day public review period on this PEA commenced on April 21, 2006 and ends on May 22, 2006. The DTSC must then approve or disapprove the PEA within 30 days from the close of this 30 day public review period.

The EIR reports on page 3B.7 that the PEA process is a component of the California regulations governing school siting that is distinct from and occurs parallel with the CEQA review process. However, school construction cannot begin unless the DTSC determines that the site does not pose a risk to future occupants and neighboring land uses. Compliance with the PEA process and DTSC approval is therefore considered a project component rather than a mitigation measure.

If the PEA process and DTSC approval are considered a project component, then both the Draft PEA Report and DTSC approval determination should be included in this EIR. Instead, the EIR makes a conclusory statement on page 3B.7 that since "compliance with the PEA process and DTSC approval is intended to ensure that the school site does not pose a health risk to future occupants and neighbors, project impacts with regard to on-site contamination are presumed to be less than significant." A presumption of less than significant impact without documented analysis does not provide a good faith effort at full disclosure of information directly related to possible environmental consequences.

Circulation of the EIR prior to completion of the PEA process is therefore premature. Depending upon the DTSC determination, there could be changes to the project proposal or additional studies that could constitute new information of substantial importance. The following corrective action is needed:

- All documentation related to the PEA process should be incorporated into the CEQA review process as a recirculation of the EIR.

Emergency Evacuation Plan

While the EIR recognizes that both derailment and pipeline rupture are potentially significant impacts, the EIR only provides mitigations related to project design features. This Section should be revised in the recirculated EIR to include the following:

- A full discussion of an emergency evacuation plan in the event of a railroad derailment or hazardous materials spill on the railway or street system; and
- More specific information for Mitigation Measure No. 3B-2 (page 3B.14) regarding the preferred design components of an engineering barrier for campus protection in the event of a train derailment.

Chapter 3C. Noise

The proposed project is located entirely within the City of Long Beach and must fully comply with the Long Beach Noise Ordinance, Municipal Code Section 8.80.

Operation of this proposed school facility will expose students and school employees to significant noise levels from nearby highway and rail traffic. The EIR on page 3C.24 states that noise generated by rail line operations will result in a maximum level of 75.2 dB(A) at the playfields and tennis courts, with the closest classroom approximately 360 feet from the railway centerline. Also on this page, the EIR states that the project site currently experiences noise levels between 68.6 to 70.1 dB(A) "at the location of the proposed classrooms, which is approximately 75 feet from the centerline of Santa Fe Avenue (which carries between 10,000 and 25,000 car per day as stated on page 3B.14 of the EIR). However, the only mitigation measure proposed to address roadway and railway noise, Mitigation Measure 3C-7, only involves classroom design to achieve an interior noise level of 45 dB(A).

The EIR states on page 3C.26 states that "(n)o feasible mitigation exists to reduce combined Santa Fe Avenue and Carson Street road noise and rail noise impacts on outdoor areas on campus and these impacts would remain significant." Therefore, this impact is included in Chapter 5.4 Significant Unavoidable Environmental Impacts. This project impact leads to two important considerations:

- A Statement of Overriding Considerations must be approved by the lead agency in accordance with CEQA Guidelines Section 15093; and
- The fact that existing noise conditions in the project site vicinity constitute a significant unavoidable adverse impact further demonstrates that this land use is incompatible with the existing industrial nature of the surrounding land uses and the accompanying traffic volumes and rail freight.

Chapter 3D. Pedestrian Access and Safety

As noted on EIR page 3D.1, "sidewalks are discontinuous on Carson Street in vicinity of the project site." There is no sidewalk abutting the project site along the northern side of Carson Street between the existing warehouse entry and the railroad right-of-way. In addition, the sidewalk along the southern side of Carson Street opposite the project site abuts a chain link

fence with barbed wire and razor ribbon that separates an existing cargo container storage site from the public right-of-way. The main railroad track right-of-way runs along the eastern project site border. There is also an existing liquor store at the northwest corner of Carson Street and Santa Fe Avenue.

Pedestrian Impacts

The EIR states on page 3D.10 that "approximately 21.6% of students typically walk or bicycle to high schools within LAUSD, which translates to 125 students for the proposed project." Since this project is intended to serve up to 1,809 students, as reported on page 2.2, then 21.6% of that student population would be 391 students.

A pedestrian analysis based on 125 students is therefore flawed and produces misleading information. Furthermore, since the project would provide no on-site parking for students or visitors, all project-generated student and visitor vehicular trips would also become pedestrian trips once the vehicle is parked off-site.

Page 3D.6 of the EIR estimates that 57.7% of all anticipated students would travel to the project site by car. Assuming each vehicle trip is driver only occupancy, the worst case morning pedestrian demand would add 1,043 driver and pedestrian trips to the 391 pedestrians, resulting in up to 1,434 students crossing Santa Fe Avenue or Carson Street during morning peak demand. While it is probable some of these project generated vehicular trips will be adults dropping off students without parking, recent State legislation now prohibits persons under 18 years of age from driving other minors to school campuses, thereby increasing the likelihood students driving to school will be the sole vehicle occupants.

The recirculated EIR must therefore provide a revised pedestrian analysis that includes the following:

- The correct ratio of project-generated pedestrian trips that solely involve walking or bicycling;
- Inclusion of project-generated pedestrian trips that result from students and visitor vehicular trips with off-site parking.

Pedestrian Traffic Patterns

Despite these existing conditions, the EIR states on page 3D.10 that "no students are expected to travel from the southeast or east of the project site" and therefore "the presence of the San Pedro Subdivision rail line east of the proposed school site and Carson Street to the south would not constitute pedestrian safety hazards." This conclusion only takes into account the travel direction from student residences and does not address student travel patterns to other nearby destinations.

More importantly, the lack of on-site student and visitor parking insures morning peak trips will involve searches for parking spaces that will spill into the industrial areas. Since the City of Carson has a preferential parking program, school-generated parking demands in the residential area west of the project site could lead to parking restrictions that would force most student and visitor parking into the adjacent industrial area (also see comments on Chapter 3G. Traffic and Transportation below). This would create student pedestrian travel patterns across

streets with large truck volumes, jeopardizing student safety as well as impeding truck movements. Placing students in direct conflict with industrial traffic patterns would be the regrettable outcome of this flawed school site selection.

The recirculated EIR should therefore include an analysis of the following nearby land uses in relation to student safety:

- The adjacent industrial area, which will lead to student conflicts with truck traffic;
- The railroad right-of-way area, which is an attractive nuisance for students seeking seclusion for any variety of reasons; and
- The mini-market, liquor store and other commercial land uses at the Carson Street/Santa Fe Avenue intersection provide incentives for students to travel off a direct school to home path.

Traffic Impact Analysis

The proposed student pick-up and drop-off turnout would be located on the northbound side of Santa Fe Avenue. The project site driveway for the faculty and staff parking garage is located north of this turnout. The EIR acknowledges the potential for conflicts between cars exiting the turnout to re-enter Santa Fe Avenue and cars attempting to enter and exit the school driveway, but provides no relief from this design conflict other than requiring vehicles exiting the driveway to right turn only onto Santa Fe Avenue (which is offered as a project design subject to possible future alteration rather than a mitigation measure requiring compliance).

As discussed above, the absence of on-site student and visitor parking will create peak period traffic congestion beyond what would occur through the introduction of additional vehicular trips generated by a school land use. The residential neighborhood would be overwhelmed with vehicles searching for parking spaces, likely leading to parking restrictions that would force parking demand into the industrial area. Not only would this create safety hazards to pedestrians, it would diminish the value of these industrial properties by impacting accessibility. This is particular true for the area east of the project site, known as the West Long Beach Business Parks Planned Development District, which is dependent on Carson Street for all direct access. It would be an unavoidable factor in locational decision making that an industrial property impacted by student parking and pedestrian traffic would be less attractive to businesses than other properties without this functional deficiency.

The Traffic Impact Analysis in Appendix H of this EIR reports that that the LAUSD has recently established the following traffic and pedestrian safety performance standards which this proposed project does not meet:

- Whenever feasible, student and bus drop-offs shall be located out of the active traffic flow. Student drop-off areas shall be located off "major streets" (i.e., consisting of four or more active traffic lanes or streets experiencing 500 or more vehicle trips during the AM peak hour). Santa Fe Avenue meets the "major street" category since it consists of four travel lanes and both the existing and future AM peak hour traffic volumes are greater than 500 vehicles.
- Right Turn Only controls are required if turning movements have the potential to create safety hazards or traffic congestion. Vehicle access, including driveways and

service roads to the school site shall, where feasible, be aligned with opposing streets to form four-way intersections with sufficient traffic controls. A project access point is proposed to be located along the east side of Santa Fe Avenue between Madison and Jefferson Streets that would create a T-intersection with Santa Fe Avenue rather than a four-way intersection.

- School site access ways shall be located and designed in concert with student drop-off areas and the dominant existing traffic flow in the area to promote safe and orderly turning movements and pedestrian crossings.

The Traffic Impact Analysis concludes that relocation of the proposed drop-off area and aligning the project access driveway with Jefferson Street with a new traffic signal "would minimize or eliminate many of the above issues."

The recirculated EIR should acknowledge the following facts:

- The City of Long Beach is responsible for the sides of Santa Fe Avenue and Carson Street that abut the project site, not the City of Carson;
- All proposed traffic control devices, signals, signs, crosswalks and drop-off areas on the east side of Santa Fe Avenue and the north side of Carson Street must be reviewed and approved by the City of Long Beach Traffic Engineer, not the City of Carson;
- Mitigation Measure 3D-2 incorrectly assigns responsibility of passenger loading zone signage to the City of Carson;
- No proposal is made regarding loading/unloading zones on the east side of Santa Fe Avenue, which is under the jurisdiction of the City of Carson;
- No school bus loading area is specifically identified in the EIR, only a general reference;
- The EIR on page 3D.11 states that design of the student drop-off on Santa Fe Avenue does not comply with LAUSD performance requirements. While vehicles exiting the project site would be limited to right turns only on Santa Fe Avenue, no re-design or relocation of the drop-off/pick-up area is proposed as a mitigation measure; and
- Since the loading/unloading area does not comply with the LAUSD performance requirements, this would be considered a significant unavoidable impact.

Chapter 3E. Public Services: Fire and Police Services

Fire Services

The EIR Fire Services analysis should be amended as follows:

- Under Construction Impacts on page 3E.6, state that the Long Beach Fire Department must approve the number and locations of all fire hydrants as well as the inlet connections for fire protection systems.
- Under the Long Beach Fire Department impact analysis on page 3E.7, the first Long Beach Fire Department would include fire suppression services, paramedic services such as Basic Life Support (BLS) and Advanced Life Support (ALS, for incidents such as heart attacks or seizures), and non-fire activities such as building collapse or

hazardous materials incidents.

- Response times may be impacted by location. If this high school is indicative of other high schools within the Long Beach Fire Department jurisdiction, the "run load" for responses could increase at several stations, requiring the assistance of the Los Angeles County Fire Department.
- Include a discussion on the requirements for fire inspections of LAUSD school facilities. The Long Beach Fire Department performs inspections of all Long Beach Unified School District schools on an annual basis.
- At present, the Long Beach Unified School District has a 24/7 "call center" where fire alarms from all schools are monitored and forward any calls to Fire Dispatch. Include a discussion of the LAUSD notification policies and procedures with the Long Beach Fire Department, including responsibilities for boarding up damaged buildings after a fire.

The proposed project will negatively impact the Long Beach Fire Department provision of protective services, and therefore the recirculated EIR should include the following mitigation:

- Mutual agreement between the Los Angeles County Fire Department and the Long Beach Fire Department on defined responsibilities for fire protection and emergency response services for the project site prior to project construction.

Police Services

The proposed project will negatively impact the Long Beach Police Department provision of protective services. However, the EIR states on page 3E.10 that "project impacts on police protection services would be less than significant."

The EIR does not specify how students at this site will receive complete police protection and follow up investigative services. Due to this deficiency, the EIR does not adequately address the impact on police services in the area around the project site.

The recirculated EIR should include the following mitigation:

- Mutual agreement between the Los Angeles School Police Department, the Los Angeles Sheriff's Department and the Long Beach Police Department on defined responsibilities for police protection and investigative services for the project site prior to project construction.

Chapter 3F. Recreation and Parks

While there are no direct impacts to Long Beach parks and recreational services and facilities through the replacement of existing industrial uses with a high school land use, this land use alteration would have detrimental indirect impacts.

The recirculated EIR should acknowledge the following:

- The loss of property tax revenue through removal of two large industrial buildings and replacement with a tax exempt land use will make it more difficult to continue to

provide recreational services for the City of Long Beach. Over the last four years of the Long Beach structural budget crisis, the general fund revenue to the Long Beach Department of Parks, Recreation and Marine have been reduced by about 30 percent despite a growing citywide population.

Chapter 3G. Traffic and Transportation

The EIR incorrectly refers to the City of Long Beach Department of Transportation in this chapter. This City of Long Beach does not have a Department of Transportation. The City of Long Beach Department of Public Works is responsible for transportation issues in Long Beach and the Traffic Engineering Division of the Public Works Department reviews and approves traffic studies under the direction of the City Traffic Engineer. Project related improvements within the public right-of-way require the approval of the City Traffic Engineer.

City of Los Angeles Department of Transportation (LADOT)

References to LADOT's Manual of Policies and Procedures, traffic analysis standards, and traffic control device installation standards are irrelevant to this project since the project site is located entirely within the City of Long Beach. The City of Los Angeles is a local jurisdiction with no regional authority in this matter.

Memorandum of Cooperation (MOC)

The EIR on page 3G.8 refers to a Memorandum of Understanding (MOC) between the LAUSD and the LADOT. This is irrelevant to the project since the LADOT has no authority over streets in the project vicinity.

The recirculated EIR show clearly acknowledge the following:

- Neither the City of Long Beach nor any employee thereof has executed a Memorandum of Cooperation (MOC) with respect to this project.

Mode Split Estimations

The EIR analysis assumes that the school will have similar alternate mode splits as other campuses within the LAUSD system. This assumption is flawed since the school is not located within the population which it is intended to serve, but rather at the eastern edge of the Target Search Area in an industrial area within the City of Long Beach.

Since the school population is located west of the proposed school site it is very likely there will be a lower walking and bicycling percentage and a higher percentage of motor vehicle use and demand for transit services than forecast in the EIR. Therefore, the following corrective action is needed:

- The recirculated EIR must include a revised mode split analysis that correctly reflects the travel patterns of students and visitors and the percentage of project-generated motor vehicle and transit use.

Transit Impacts

The EIR reports on page 3G.2 that the project site is served by six transit routes and the Metro Blue Line. Four of these six transit routes are operated by Long Beach Transit and do not provide service to the project service area from which the student population is expected to reside. Furthermore, the Blue Line provides service between downtown Long Beach and downtown Los Angeles, and therefore is unlikely to carry any students destined to or from this school site. Thus the only remaining public transit service identified in this EIR that would actually serve the project site is Carson Circuit Routes D and G.

As reported on page 3G.2, Carson Circuit Routes D and G run generally in a loop, providing service along Avalon Boulevard, Del Amo Boulevard, Santa Fe Avenue and Carson Street. Routes D and G essentially follow this same path in opposite directions, thus students using Route D would have to cross a major roadway to access this transit service. Both routes operate on 40 minute headways (meaning it takes approximately 40 minutes to complete the entire loop route), thus this public transit system as it is currently configured would most likely only be able to provide one bus in each direction during the morning peak arrival and afternoon peak departure periods for the school.

The EIR assumes that LAUSD will provide two school buses for student transport to and from outlining areas. Since the EIR assumes that 20.7% of all students would arrive or depart by public transit (page 3D.6), how would Routes D and G adequately accommodate these up to 374 students during morning and afternoon peak demand periods? Even combining the public transit and school bus operations would not provide a sufficient number of seats to transport this student volume without substantial delays.

Based on the actual transit service availability to the project site, it cannot be assumed that the project would not have a significant adverse impact on the public transit system. Therefore, the following corrective action is needed:

- The recirculated EIR must include a revised transit impact analysis that correctly compares the actual availability of transit services to project-generated transit demand.

Parking Impacts

The EIR inappropriately assumes that on-street parking will be available for overflow and student parking. This is a flawed assumption since on-street parking in the residential neighborhoods west of the project site is intended for use by the residents of those neighborhoods and not the project site, which is located in an industrial area across from a heavily traveled arterial (Santa Fe Avenue). As discussed above, school-generated parking demand would also lead to competition for parking in the adjacent industrial areas, creating pedestrian safety hazards, delaying truck movements, and diminishing the economic value of industrial properties.

It is more realistic that students and others destined for the project site who do not have access to the school campus on-site parking (restricted for school employees only) will attempt to park as close as possible to the school site. Therefore, parking within the residential neighborhood

streets will not be evenly distributed throughout the neighborhoods but rather concentrated in the blocks closest to the school, creating a significant impact as residents and their guests compete with school patrons for the same on-street parking. As the EIR estimates that 57.7% of the anticipated student trips would be by car (page 3D.6), this would result in up to 1,043 student vehicles seeking off-site parking during morning trips. This is significantly higher than the 402 on-street spaces the EIR states would be needed to meet the projected student parking demand (page 3G.31). It must also be acknowledged that since there is no on-site student or visitor parking for this project, every student or visitor who drives to school also becomes a pedestrian once the vehicle is parking off-site.

Since the City of Carson has a preferential parking program, it is likely that these impacted neighborhoods will eventually seek relief from this school generated increase in on-street parking demand through preferential parking in these neighborhoods that would prohibit student parking and thus reduce the available on-street parking supply for students and campus visitors (which could include evening sports and arts performances). Since the project does not provide any on-site student or visitor parking, it is possible that preferential parking restrictions could expand to prohibit non-resident parking from the entire surrounding area. Thus this situation could ultimately lead to business related parking impacts within the City of Long Beach that were not reviewed or analyzed in the EIR.

Given the realistic desire of students and visitors to park as close to the project site as possible, the parking analysis must be revised as follows:

- The recirculated EIR must provide a revised parking analysis that accounts for the realities of parking demand with the anticipated volume project-generated vehicular trips during morning and afternoon peak periods.

Intersection Level of Service Calculations

The EIR incorrectly applied the clearance and loss time factor in the level of service calculations for the City of Long Beach intersections; thereby, not providing an accurate assessment of the existing and future traffic operations at those intersections. In conducting sporadic recalculations on the data provided, it has been discovered that the intersection levels of service projections provided in the EIR can drop a full letter grade.

The following corrective action is therefore needed:

- The traffic study intersection within the City of Long Beach needs to be recalculated in the recirculated EIR to properly to determine if the project has a significant traffic impact.

Santa Fe and Carson Intersection Operations

Although the level of service calculations in the EIR do not indicate that the project will result in an over-capacity situation, the project will have a profound effect on traffic volumes, patterns, and operations at this intersection. The EIR predicts that during the peak periods of student arrival and departure there will be an eastbound left-turn demand of approximately 400 vehicles per hour. This amount of traffic cannot be adequately served operationally by only a single left-turn lane. Without the provision of a second eastbound left-turn lane and traffic signal

modifications to handle the increased demand and pedestrian volumes, the left-turn lane will become saturated and the queue of vehicles waiting to make the eastbound left-turn will back-up into the eastbound through lane, resulting in the potential for rear-end accidents and diversion of traffic to other routes, potentially into the residential neighborhoods.

These operational impacts are predictable and need to be studied in greater detail. Therefore, the following corrective action is needed:

- The recirculated EIR must recalculate project impacts on eastbound traffic and the project-generated left turn demands during morning peak periods.

Proposed Student Drop Off Zone

The east curb of Santa Fe Avenue adjacent to the project site is located within the City of Long Beach and therefore any curb and sidewalk modification would require the approval of the City of Long Beach Department of Public Works. The proposed drop-off zone is not acceptable and poses significant safety concerns by encouraging double parking and U-turns on Santa Fe Avenue.

The City of Long Beach will not grant its approval for the drop-off zone as proposed. Without a drop-off zone the project would violate LAUSD's own Traffic and Pedestrian Safety Requirements for New Schools unless an on-site drop-off zone can be created.

Mitigation Measure 3D-1

It is unclear from the text if the proposed traffic control device would be a full traffic signal or some other type of crosswalk and warning device. Since the east curb of the Santa Fe Avenue and Jefferson Street T-intersection is located within the City of Long Beach, the proposed device will have to be designed and constructed to the satisfaction of the City of Long Beach City Traffic Engineer.

Mitigation Measure 3D-2

The east curb of Santa Fe Avenue adjacent to the project site is located within the City of Long Beach. Any proposed modifications within the City of Long Beach right-of-way, such as driveways, poles, utilities, signage, etc., will require coordination with, and approval of, the Department of Public Works.

LAUSD should schedule a year coordination effort to obtain necessary City of Long Beach approvals.

On-Site Bus Drop Off

The EIR indicates that an on-site bus drop off zone will be provided; however, it is unclear from the Site Plan where such a zone would be located or how a bus would enter, maneuver within the project site, and leave the project site. Since a number of the internal drivable pathways traverse athletic facilities, primary walkways, and assembly areas, bus travel within the project site could be restricted as well as pose significant student safety issues.

The following corrective action is needed:

- The recirculated EIR must accurately show the proposed on-site school bus drop-off location and provide a thorough analysis of this drop-off area on the surrounding street system.

Chapter 3H. Public Utilities: Water Supply and Wastewater

A portion of the project site is located within the service area of the Long Beach Water Department. Dominguez Park and Dominguez Elementary School do not receive water or sewer service from the Long Beach Water Department.

Under this project proposal, water demand will increase for the Long Beach Water Department while water demand for the existing schools in the City of Carson, provided by the California Water Company, would be reduced. This creates a significant impact to the Long Beach Water Department on the provision of water supply.

A project of this size, with an anticipated enrollment of over 1,800 students and the accompanying employee and landscaping water demands, would be subject to the State requirement for preparation of a Water Availability Assessment.

Effective January 1, 2002, California Senate Bill 221 and Bill 610 amended Section 21151.9 of the Public Resources Code and Sections 10631, 10656, 10910-12, and 10915 of the Water Code, Section 11010 of the Business and Professions Codes, and Section 65867.5 of the Government Code as well as adding Section 66455.3 and 66473.7 to the Government Code. The Senate Bills were designed to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 221 and SB 610 are companion measures which seek to promote more collaborative planning between local water suppliers and cities and counties. Both statutes require detailed information regarding water availability to be provided to the city and county decision-makers prior to approval of specified large development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects.

Both measures recognize local control and decision making regarding water availability for certain identified large projects. Water Code Section 10912 provides seven different project categories that would trigger the Water Availability Assessment requirement. One category is a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project. Since the high school project proposal is to accommodate an enrollment of over 1,800 students with the accompanying facility and other on-site school employees, this project would clearly exceed the water demand of a 500 unit project.

The portion of the project site that would contain the classroom and physical education structures would be served by the Long Beach Water Department. This is where project-generated water demand will occur in bathrooms, water fountains, landscaping irrigation and gymnasium showers. Therefore, the Water Availability Assessment must be prepared by the Long Beach Water Department.

The following corrective action is therefore needed:

- As required by State law, the recirculated EIR must include the Water Availability Assessment prepared by the Long Beach Water Department.

Chapter 4. Alternatives Analysis

CEQA requires EIRs to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic project objectives while avoiding or substantially lessening significant environmental impacts, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly.

CEQA Guidelines Section 15126.6(f)(2)(A) states that in regard to alternative project locations, "(t)he key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."

Range of Alternatives

The EIR fails to provide an adequate range of reasonable alternatives. Only five Alternatives are provided for consideration, and the No Project Alternative and the Reasonably Foreseeable On-Site Alternative are essentially the same alternative, since both involve no high school project on the proposed site. Whether the project site retains the same land uses and buildings or at some future time is altered for new construction and land uses in accordance with applicable Long Beach regulations is a matter of local jurisdiction that is unrelated to the project proposal.

The Alternative Project Design simply eliminates joint use of the Dominguez Park softball field from the project proposal. This is a very minor change only involving high school use of this existing park softball field during and after school hours during the week. The practical result of this alternative would be the same use of the project site as the project proposal, which includes a lighted baseball field at the southwestern portion of the project site. There is not enough difference between this alternative the project proposal for any substantial lessening of project impacts, therefore rendering it meaningless as an alternative.

The result is only three project alternatives: No Project/Continuation of Existing Uses, Reduced Project Size and the Selected Alternative Site. Therefore, the following corrective action is needed:

- The recirculated EIR must provide a meaningful range of alternatives that would meet the objectives of a high school while avoiding or at least substantially reducing the significant impacts of the proposed project.

Alternative Sites Eliminated from Further Consideration

The EIR approach to rejected alternative sites is limited to conclusory statements lacking in supporting evidence. Only one paragraph of discussion per rejected alternative site is provided on pages 4.6 and 4.7. The discussion consists of a description of the alternative site location,

surrounding land uses, and assertion that each alternative site is infeasible either because of nearby industrial facilities or a location outside of the target search area. There is no disclosure of the criteria used in rejecting these alternative sites sufficient to allow for informed public participation and comment.

Table 4-1 lists the LAUSD criteria for selection of school sites, but the alternative sites are not ranked using these criteria in relation to the proposed project. There are several instances where the project proposal may not meet this criteria, including Environmental, Safety and Political. If this criteria was used in the determination to eliminate various alternative sites from further consideration, the ranking of each site and reasons from that ranking should be disclosed to better foster public disclosure and participation.

Alternative Sites 3 and 6 were rejected due to locations outside the Target Search Area shown in Figure 2-1. Alternative Site 3 is not only outside the target search area but also outside the LAUSD district boundaries and not available for use without a change in district boundaries. It is not explained why these alternative sites were even identified if such locations had no realistic chance of consideration regardless of whether the site locations could avoid or substantially lessen any of the significant project impacts.

Alternative Sites 1, 2, 5 and 7 were rejected for proximity to industrial uses and/or hazardous materials pipelines. However, the proposed project site is also located close to the same types of land uses and industrial infrastructure.

As with many of the rejected alternative sites, the project site is near both industrial facilities and sites with potentially hazardous emissions, as discussed in Chapter 3B. Hazards and Hazardous Materials:

- Figure 3B-1 provides the locations of eight potential hazardous release sources within one-quarter mile of the project site.
- Figure 3B-2 identifies a high pressure crude oil pipeline and a high pressure fuel pipeline that both abut the project site boundaries.
- A Union Pacific main railroad track abuts the eastern boundary of the project site with no wall or grade separation to prevent pedestrian access.
- A 55 kV Edison power line runs along the northern public right-of-way along Carson Street that abuts this project site.

The project site is also near land uses that are typically considered incompatible with a high school location:

- There is a Port operated cargo container storage land use (Harding Containers) on the south side of Carson Street opposite the southern boundary of the project site. This storage facility has a chain link fence with both barbed wire and razor ribbon abutting the sidewalk.
- East of the railroad track is a business and industrial park area (the PD-26 West Long Beach Business Parks Planning Development District) that permits manufacturing and warehouses uses.
- The intersection of Carson Street and Santa Fe Avenue contains a liquor store at the northwest corner, and a gas station and mini-market at the southwest corner.

Given the industrial character of land uses to the south and east, high pressure pipelines and a main railroad track to the east, and potential attractive nuisances at the Carson/Santa Fe intersection, it is difficult to understand why the project site is considered environmentally superior to the alternative sites that were summarily rejected for proximity to the same type of land uses that characterize the project site vicinity.

Alternative Sites 1 and 2 in fact have certain locational advantages over the project site. Both sites are more centrally located in the LAUSD target search area and have fewer potentially incompatible neighboring land uses.

- **Alternative Site 1**, located at the northwest corner of East 213rd Street and Martin Street, is a vacant lot at the edge of a single family residential neighborhood to the south and east of this site. Although there are above ground storage tanks to the west (west of Vera Street) and electrical power generating facilities to the north, this alternative site at 19.49 acres is much larger than the 13.7 acre project site and thus could allow for sufficient buffer area to the west and north while still providing adequate campus and recreational space (8 to 15 acres is considered the acceptable range by LAUSD for high schools). In contrast to the project site, there are no major corridors with substantial truck traffic, no railroad tracks, no heavy industrial uses such as cargo container storage, and no nearby attractive nuisances such as liquor stores.
- **Alternative Site 2**, this 13.78 acre site (bounded by Wilmington Street, East 213rd Street, Ballard Street, and Water Street) is also located by a single family residential neighborhood. In addition, Del Amo Elementary School and Dolphin Park are located by the northern extension of this site. The only industrial land uses are located to the north of this site and along portions of Wilmington Avenue.

Without further explanation of why these Alternative Sites were rejected due to surrounding land uses and facilities, it would appear that Alternative Sites 1 and 2 better meet the Project Objectives than the project site. Only with analysis of all environmental issues can an informed determination be made as to whether these Alternative Sites are environmentally superior to the project site.

The following corrective actions are therefore needed in the recirculated EIR:

- Full comparison of each rejected alternative site with the LAUSD Site Selection Criteria and determination of whether each rejected alternative is similar, superior or inferior to the proposed project site by each of these selection criteria standards;
- Full comparison of each rejected alternative site with the State Department of Education Site Evaluation Standards and determination of whether each rejected alternative is similar, superior or inferior to the proposed project site by the State standards;
- Full comparison of each rejected alternative site with the proposed project site in terms of nearby incompatible land uses and facilities, including industrial land uses, hazardous material pipelines, railroad tracks, electrical power lines, and commercial uses such as liquor stores; and

- Full comparison of each rejected alternative site with the proposed project site in terms of travel distance from the target student population.

Selected Alternative Site

Alternative Site 4, located in the middle of the PD-26 West Long Beach Business Parks Planning Development District, is even further removed from the Target Search Area student population. Use of this site for a high school would completely change the nature of PD-26 permitted uses since SCAQMD Rule 1401.1 restrictions would conceivably apply to all properties in this Business Park District.

This site is adjacent to the Long Beach Freeway (I-710) without direct freeway access. This location would subject students to constant levels of degraded air quality, particularly for PM and carbon monoxide, given the heavy volumes of truck traffic on this freeway. Freeway noise would degrade campus outdoor activities even if the classroom design could reduce noise impacts to school district standards. Accessibility to this site is limited to Carson Street only, which could impede emergency vehicle response times.

Given all these locational deficiencies, it is difficult to understand why this alternative site was selected over the other alternative sites nearby the targeted student population. As shown in Table 4-2, this alternative site was also determined to have greater environmental impacts than the proposed project site (in Aesthetics, Hazardous Materials, Land Use and Planning, Noise, and Pedestrian Safety.) Again, full comparison with the other alternative sites is necessary to allow for meaningful disclosure of important project information.

Recirculation of the EIR

Given the many deficiencies in this EIR, a recirculation is necessary to provide the public and decision-makers with a complete analysis of potential environmental impacts related to pedestrian impacts, police services, fire services, traffic and parking impacts, water supply, alternatives sites, and cumulative projects within the City of Long Beach. The Draft Preliminary Environmental Assessment (PEA) must also be incorporated into the Draft EIR, since the PEA contains significant project information that should be made available to the public for review and comment in accordance with the provisions of CEQA.

All questions regarding this environmental review process should be directed to Angela Reynolds, Planning Officer, at (562) 570-6357.

Sincerely,

Suzanne Frick
Director of Planning and Building

SF/kmb