



EXHIBIT NO.	1
Application Number	5-08-251
Vicinity Map	
California Coastal Commission	

LOS ANGELES AREA
 SCALE
 0 1 2 3 4 5 MILES

RECEIVED
 CALIFORNIA COASTAL COMMISSION

HUNTINGTON BI

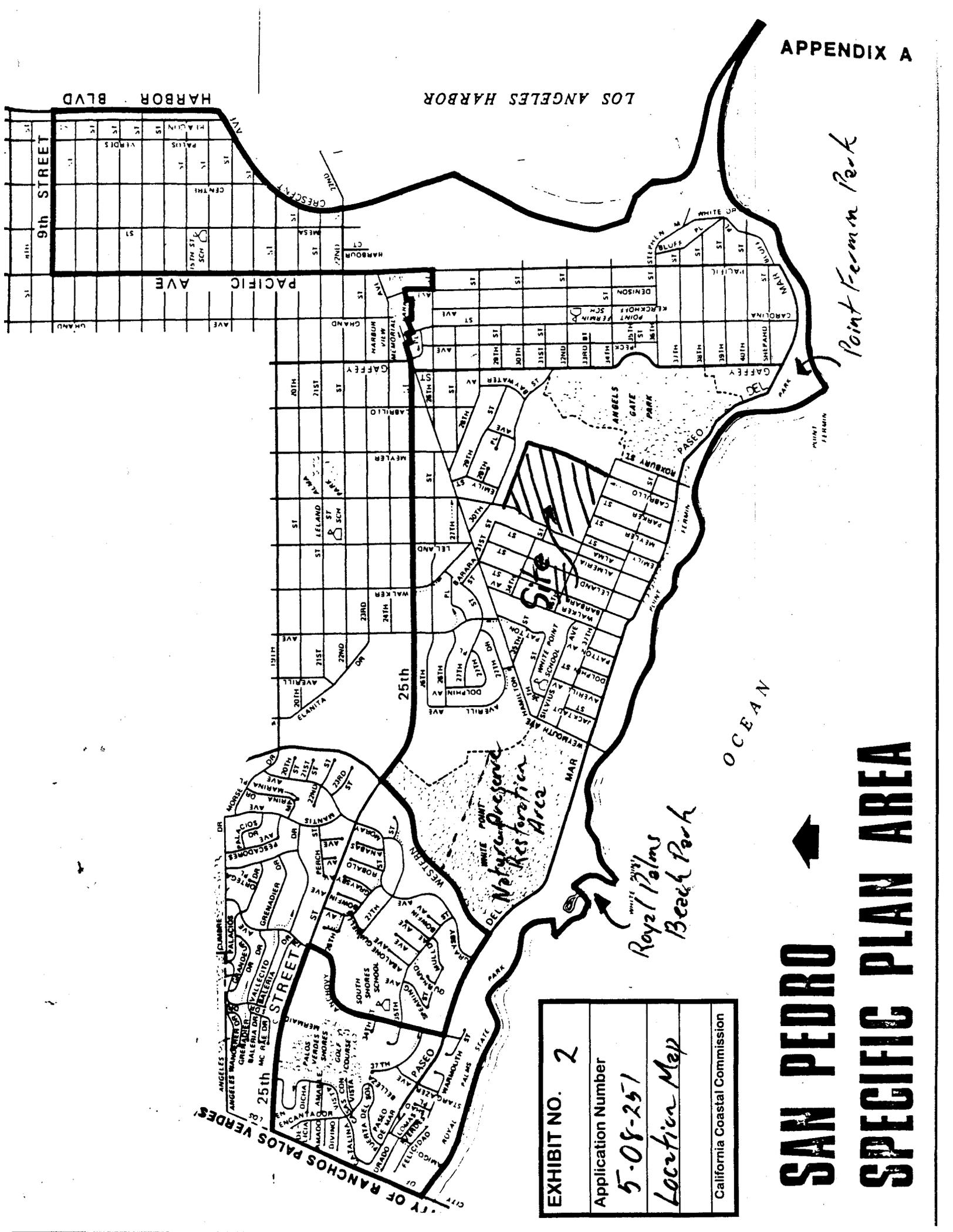


EXHIBIT NO. 2
Application Number
5-08-251
Location Map
California Coastal Commission

SAN PEDRO
SPECIFIC PLAN AREA

Royal Palms Beach Park

Point Fermin Park

White Point Nature Preserve Area

Site

HARBOR BLVD

LOS ANGELES HARBOR

9th STREET

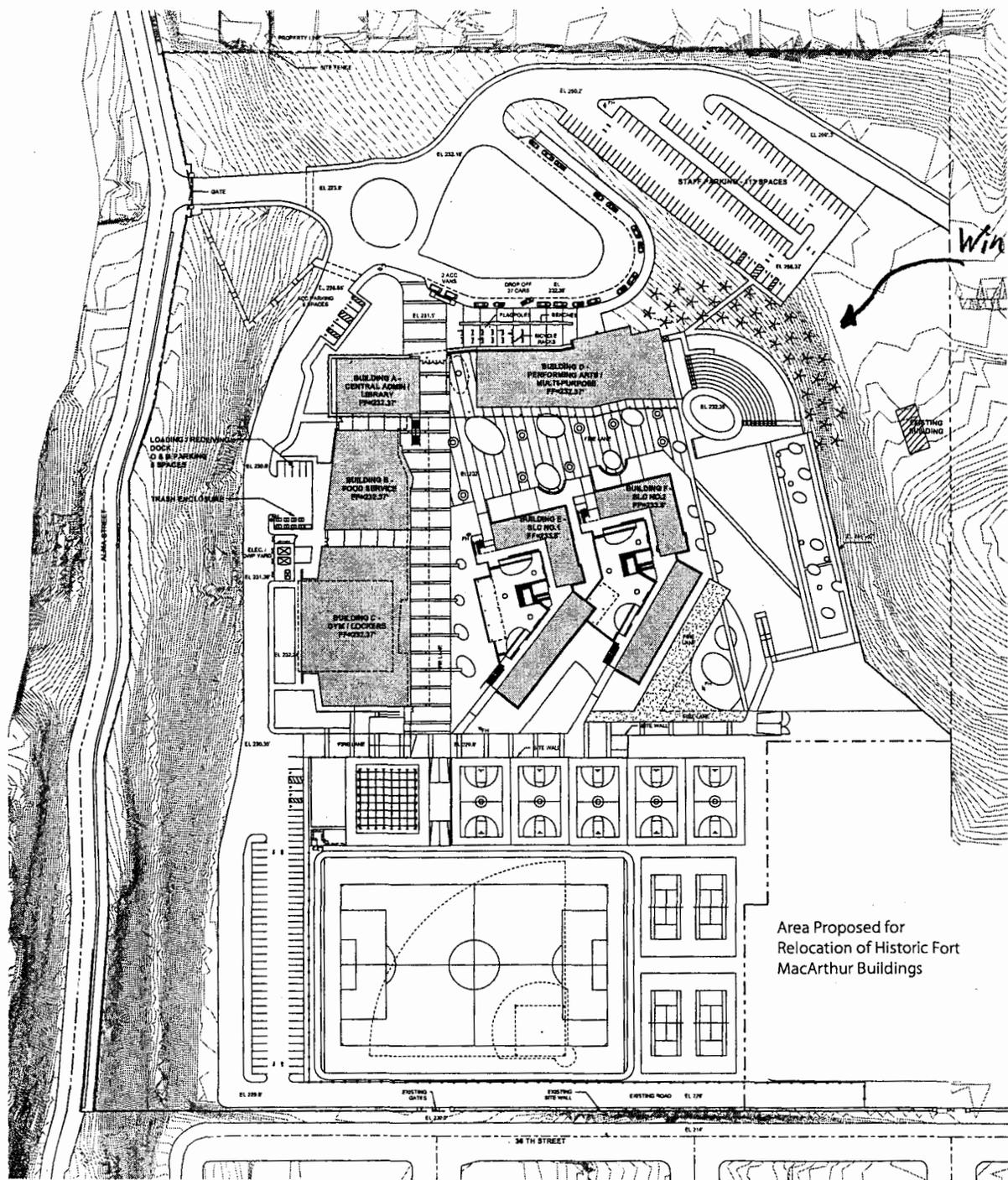
PACIFIC AVE

25th

OCEAN

CITY OF RANCHOS PALOS VERDES

K:\Projects\LAUSD_SF_LHS_1500002\08\main\doc\Figure2_4_SitePlan.ai A:\C (08-06-2008)



Wind Turbine location

Area Proposed for Relocation of Historic Fort MacArthur Buildings

EXHIBIT NO.	3
Application Number	5-08-251
Site Plan	
New High School	
California Coastal Commission	

Figure 2-4
Conceptual Site Plan
Proposed South Region High School No. 15

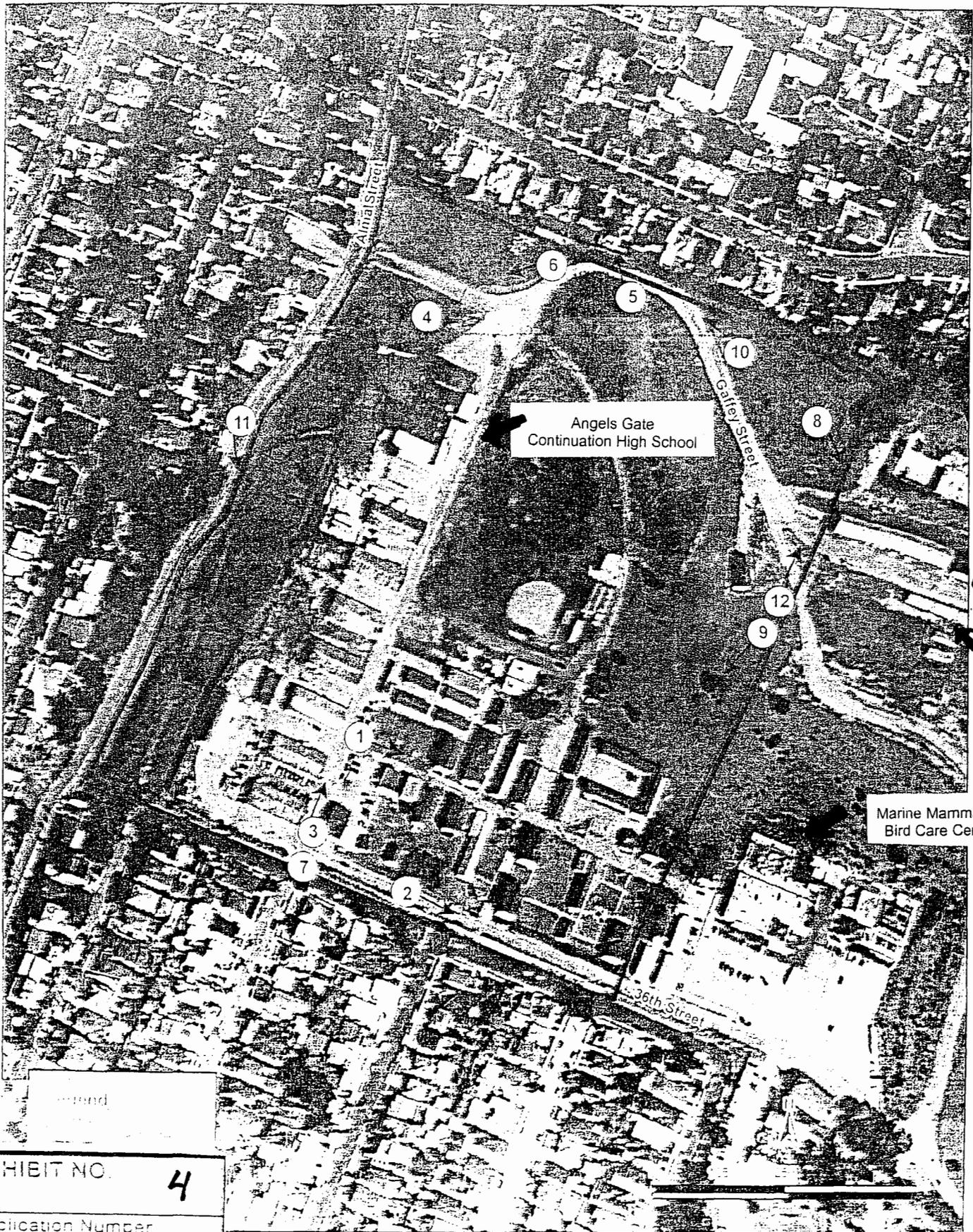


EXHIBIT NO.	4
Application Number	5-08-251
<i>Existing Site Development</i>	
California Coastal Commission	

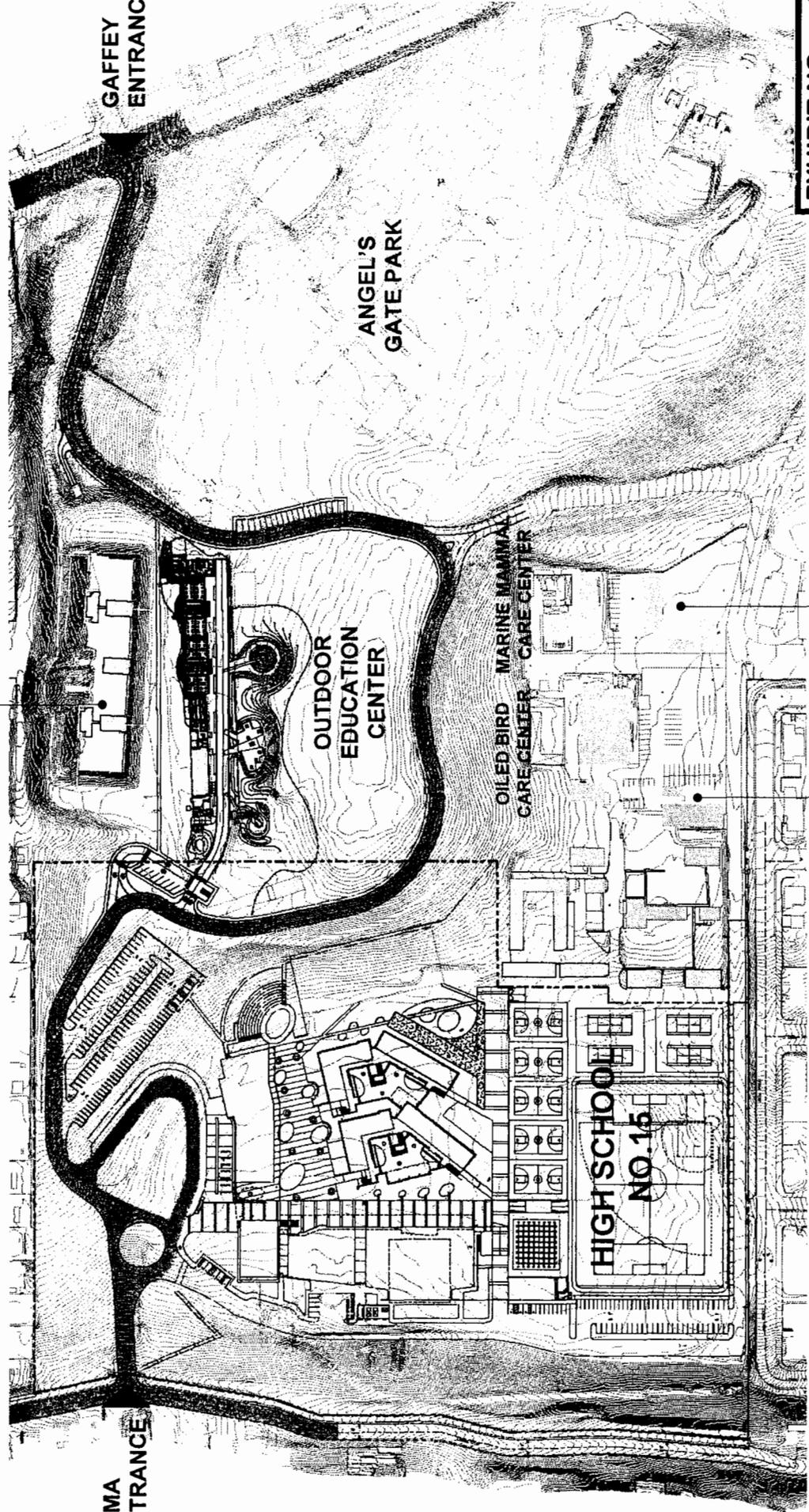
Figure 3A-2
Key Viewpoints
LAUSD South Region High School No. 15

SITE ACCESS

BARLOW-SAXTON
BATTERY

ALMA
ENTRANCE

GAFFEY
ENTRANCE



ANGEL'S
GATE PARK

OUTDOOR
EDUCATION
CENTER

OILED BIRD CARE CENTER
MARINE MAMMAL
CARE CENTER

HIGH SCHOOL
NO. 15

ANGEL'S GATE
CONTINUING HIGH
SCHOOL

EARLY
EDUCATION
CENTER

EXHIBIT NO. 5

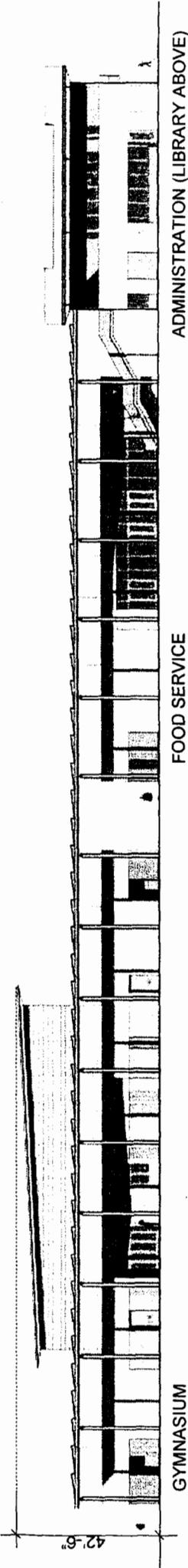
Application Number

5-08-251

Site Access



EAST ELEVATION



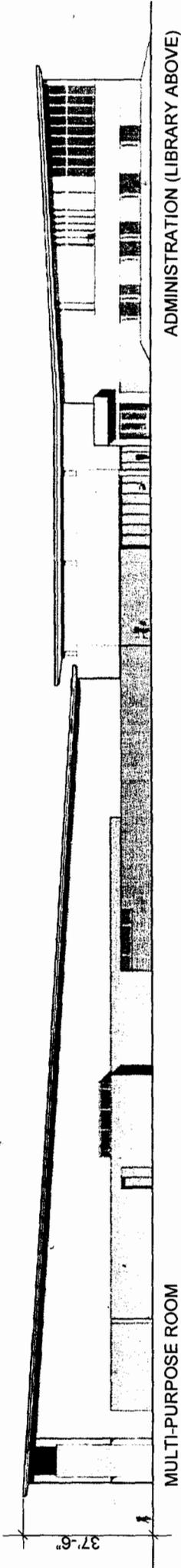
GYMNASIUM

FOOD SERVICE

ADMINISTRATION (LIBRARY ABOVE)

42'-6"

NORTH ELEVATION

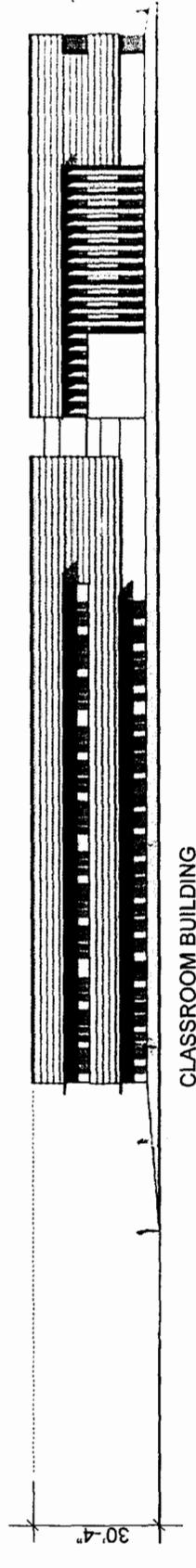


MULTI-PURPOSE ROOM

ADMINISTRATION (LIBRARY ABOVE)

37'-6"

EAST ELEVATION



CLASSROOM BUILDING

30'-4"

EXHIBIT NO. 6
 Application Number
 5-08-251
 Elevations

SUSTAINABILITY – CLASSROOM DESIGN

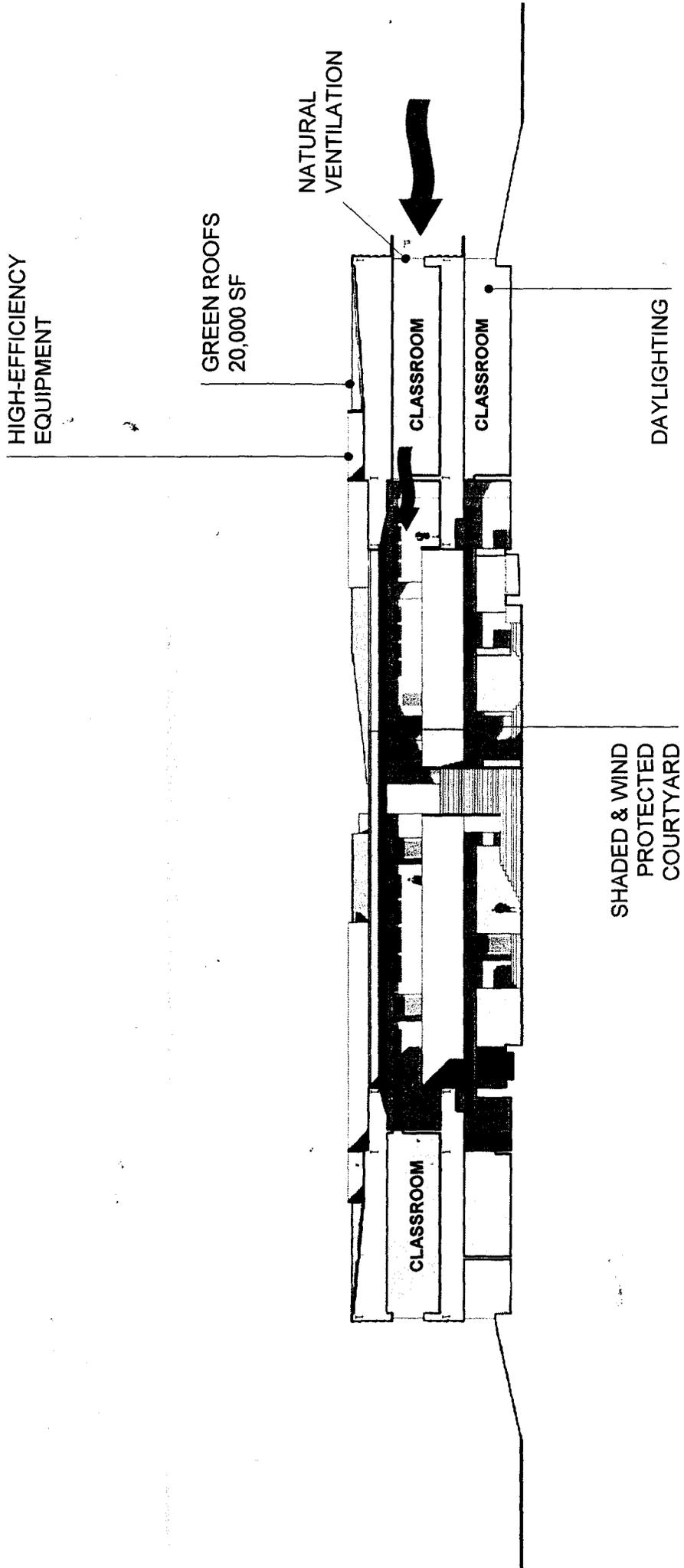


EXHIBIT NO. 7
Application Number 5-08-251
Sustainability Design

EXHIBIT NO. 8

Application Number

5-08-251

Letter from

DFG

California Coastal Commission



State of California - The Resources Agency

ARNOLD SCHWARZ

DEPARTMENT OF FISH AND GAME

<http://www.dfg.ca.gov>

South Coast Region

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201

September 26, 2008

Mr. John R. Anderson
 Los Angeles Unified School District
 Office of Environmental Health and Safety
 1055 West 7th Street, 9th Floor
 Los Angeles, CA 90017
 (Office) 213-893-7424
 (Fax) 213-893-7412

**Subject: Comments Regarding the Draft Environmental Impact Report (DEIR) for
 Los Angeles Unified School District, South Region High School No. 15
 (SCH# 2008031020), Los Angeles County**

Dear Mr. Anderson:

The Department of Fish and Game (Department) has reviewed the above referenced draft Environment Impact Review (DEIR) received on August 25, 2008. The Department is a Trustee Agency and a Responsible Agency pursuant to California Environmental Quality Act (CEQA), Sections 15386 and 15381, respectively. The Department is responsible for the conservation, protection, and management of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act, and other sections of the California Fish and Game Code.

The project site is 0.5 mile from the Pacific Ocean, approximately 1.0 mile from the Los Angeles Harbor, and 0.5 mile from Whites Point Nature Preserve. Los Angeles Unified School District (LAUSD) owns 47 acres of the 111 acre Fort MacArthur Upper Reservation (Upper Reservation), a former military installation. The proposed project would involve the construction of a new 810-seat High School on 28 acres of LAUSD property. The Project is located in the community of San Pedro, which is a portion of the City of Los Angeles, Los Angeles County. The remaining 64 acres of Upper Reservation is presently owned and operated by the City of Los Angeles Department of Recreation and Parks.

The high school may be developed as a green demonstration project and would utilize wind turbines, photovoltaic panels, and green roofs. Up to 36 wind turbines with a maximum height of 50 feet are proposed to be sited within the project footprint and internal to the development.

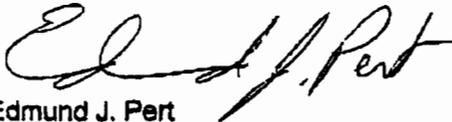
LAUSD has incorporated the following mitigation measures relative to biological resources: avoidance of vegetation removal during the nesting season (March 1- August 31); incorporation of pre-construction nesting bird surveys during nesting season; delay tree removal of trees with known avian nesting locations; incorporation of the 2007 California Energy Commission Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development for Category 2 projects.

John R. Anderson
September 26, 2008
Page 2 of 2

The Department appreciates the incorporation of the voluntary California Energy Commission guidelines. The incorporation of the guidelines to the project, combined with the other mitigation measures should reduce impacts to biological resources. The incorporation of the mitigation measures will assist the Department in future coordination with LAUSD regarding the biological resources the Department is entrusted with managing. Future coordination on the quarterly avian site-use surveys, siting criteria of wind turbines, and reports should be directed to: The Department of Fish and Game, South Coast Region 4949 Viewridge Avenue San Diego, CA 92123.

Thank you for this opportunity to provide comment. Please contact Mr. Matt Chirdon, Environmental Scientist, at (760) 757-3734 if you should have any questions.

Sincerely,



Edmund J. Pert
Regional Manager
South Coast Region

cc: Terri Dickerson, DFG, Laguna Niguel
Matt Chirdon, DFG, Oceanside
Helen Birss, DFG, Los Alamitos
HCP-Chron, DFG, San Diego
State Clearinghouse, Sacramento

a detailed species list as well as an estimate of the numbers of individuals for each species is lacking. A list of species that might pass through the harbor area is shown below and is based on information gathered from the Pt. Reyes Bird Observatory.

Common Name	Scientific Name	Protected Status	Comments
Bell's vireo	<i>Vireo bellii</i>	-	
Warbling vireo	<i>Vireo gilvus</i>	-	Is being considered for CSC
Southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	FE	
Olive-sided flycatcher	<i>Contopus borealis</i>	MNBMC	
Brewer's sparrow	<i>Spizella breweri</i>	-	
Bell's sage sparrow	<i>Amphispiza belli belli</i>	FSC, CSC, MNBMC	
Yellow warbler	<i>Dendroica petechia brewsteri</i>	CSC	
Black-headed grosbeak	<i>Pheucticus melanocephalus</i>	-	
Common yellowthroat	<i>Geothlypis trichas</i>	-	
Townsend's warbler	<i>Dendroica townsendi</i>	-	
Hermit warbler	<i>Dendroica occidentalis</i>	MNBMC	
Lewis' woodpecker	<i>Melanerpes lewis</i>	-	
Band-tailed pigeon	<i>Columba fasciata</i>	-	
Eastern wood pewee	<i>Contopus virens</i>	-	Migrate in large numbers
Western flycatcher	<i>Empidonax difficilis</i>	-	Migrate in large numbers
Swainson's thrush	<i>Catharus ustulatus</i>	-	
Wilson's warbler	<i>Wilsonia pusilla</i>	-	Fall migration is primary concern
Yellow-breasted chat	<i>Icteria virens</i>	CSC	
Blue grosbeak	<i>Guiraca caerulea</i>	-	
Grasshopper sparrow	<i>Ammodramus savannarum</i>	MNBMC	
Western meadowlark	<i>Sturnella neglecta</i>	-	
White-crowned sparrow	<i>Zonotrichia leucophrys</i>	-	Migrate in large numbers. Susceptible to light

- FE - Federal endangered
- FSC - Federal Species of Concern
- CSC - California Species of Concern
- MNBMC - Migratory Non-game Bird of Management Concern

This list contains several species that have state or federal protected status. It is by no means complete, and there is a high probability that additional sensitive species pass through the area.

EXHIBIT NO. 9
Application Number 5-08-251
Bird Species
California Coastal Commission

Ann Stone
3606 S. Emily St
San Pedro, CA 90731
annkstone@cox.net

EXHIBIT NO. 19
Application Number 5-08-251
Letters from Public
California Coastal Commission

October 7, 2008

Ms. Grace Estevez, Project Manager
LAUSD Office of Environmental Health and Safety,
1055 W. 7th Street, 9th Floor,
Los Angeles, CA 90017

Re: South Region HS #15, 56.40092, Comments on Draft Environmental Impact Report

To Whom It May Concern:

The following pages include comments to the Draft Environmental Impact Report (DEIR) for the South Region High School No. 15 (SRHS 15) project with a proposed location on the Upper Reservation of Fort MacArthur in San Pedro, California.

We the residents of single family homes located south of the proposed SRHS #15 are responding to the inconsistencies and confusing information regarding the athletic facilities and resulting noise and traffic concerns described in the CEQA mandated DEIR. The following explicitly describes the confusing and inconsistent information quoted from the published DEIR dated August 2008. It is our understanding that we have the right to respond to the published and circulated document that has been put forward to help us determine the IMPACT that the proposed SRHS #15 has on our neighborhood and on the quality of our lives as long time residents. In general, our feeling is that the DEIR document is so flawed and contradictory because of conflicting information that we request that a new DEIR be issued and that we be granted a new 45 days time period to respond, given the CEQA requirements, to the new information that is given to us.

The following is a collection of quotes from the August 2008 DEIR that show the many flaws and inconsistencies that run throughout the published document. For the purposes of this response we are concentrating ONLY on the proposed athletic facilities which we feel as residents closely located to these proposed facilities, significantly impact us, as residents and as a neighborhood, the most substantially. By concentrating on this one issue, we are not indicating that we do not have other concerns about many other issues described in the DEIR related to SRHS #15 that we feel are important and that also affect our wellbeing. We support the efforts of other citizen groups who are responding to other serious issues.

Please note that the following references the August 2008 DEIR giving direct quotes, page numbers and clarifying questions. Please respond to our concerns by addressing a letter to: Ann Stone, 3606 S. Emily, San Pedro, CA 90731. Ms. Stone will take

responsibility for disseminating your response to all of residents who have signed this DEIR response.

Please Note:

On page ES-3, Project Objectives states:

“Maintain existing opportunities for after-school athletic and extra-curricular activities;” This objective says “maintain” rather than expand or increase. Please explain.

p. ES- 4, states that 64 acres of the Upper Reservation are “currently owned by the City of Los Angeles Department of Recreation and Parks (LADRP) for (among other uses) “various recreational facilities.” These recreational facilities are carefully located away from nearby residents.

p. ES-5 Project Description:

“Also included would be an outdoor amphitheater with an approximate 600-seat capacity for school programs and informal recreation. Athletic facilities for baseball, softball, soccer, tennis, and basketball are planned along the southern perimeter of the site. A swimming pool may be included as part of the project upon development of a Memorandum of Understanding with the City of Los Angeles. No outdoor field lighting is proposed.”

p. ES-5, second paragraph refers to “PV panels proposed for the roof of the gymnasium” The gymnasium is not listed as a part of 107,627 square foot development (p. ES-4) which “would include 30 classrooms, administrative areas, a multipurpose room and a library in the center of the site.”

p. ES-6 states “noise impacts associated with crowd noise from the proposed bleachers at the turf fields are also significant.” Bleachers are not mentioned in the Project Description and “turf fields” in the plural leaves questions as to how many fields are proposed. Two different drawings of the proposed site show one field and two fields.

p. ES-15 Impact 3G-2

“The proposed South Region High School No. 15 would result in a permanent increase of over 3 dBA Ldn in ambient noise levels in the project vicinity above levels existing without the project for areas where existing ambient noise levels, or the projected ambient noise level after implementation of the project, would exceed acceptable noise levels adopted in local agency noise ordinances or general plan goals.”

Result: Less than significant; no mitigation is required. Why is this less than significant when it “would exceed acceptable noise levels”?

p. ES -16, Impact 3G-3

“The proposed South Region High School No. 15 would result in temporary or periodic noise levels above 75 dBA when measured at a distance of 50 feet from project-related activity for school zones or other sensitive receptors within 500 feet of a project site, or a significant increase of 10 dBA or more above ambient noise levels.

Result: Significant; Implementation of Mitigation Measure 3G.1 would reduce temporary construction noise impacts, however, impacts associated with the proposed outdoor activities during operation of the Proposed High School would remain significant and unavoidable; No feasible mitigation is available.” Please explain why this is allowed if it is significant and no feasible mitigation is available?

p. ES-19 No Project Alternative states that not building the school would fail to meet the objective to “maintain existing opportunities for after-school athletic and extra-curricular activities.” How are existing opportunities affected by not building new athletic facilities?

p. ES-22 states that even if the size of the school were reduced the proposed project would still include “outdoor amphitheater; athletic facilities for baseball softball, soccer and basketball.” Does this mean tennis courts would be eliminated? There is no mention of a gymnasium. Would a gymnasium be included? Why would a reduced sized school require such extensive athletic facilities?

Chapter 2: Project Description and Environmental Setting

p. 2-4 Surrounding Land Uses

“The immediate area surrounding the Proposed Project Site is urbanized and characterized by a mix of land uses. “To the south, single-family residential, the Fort MacArthur Museum located in the Osgood-Farley area and a chapel;”

With regard to the proposed athletic facilities, only single-family residences are to the south (the museum and chapel are off to the east and do not border these facilities.) A more apt description of the impacted residential area would be suburban. There are no businesses or mixed use in the directly affected area.

p. 2-5 Project Description refers to “school facilities for off-hour community use.”

Figure 2-4 Conceptual Site Plan. The enclosed drawing of the proposed site is unmarked and confusing. It appears that the athletic facilities stretch along 36th Street within 100 feet of residences on 36th and below on Emily, Meyler, Parker and Cabrillo. It appears that a combination soccer/baseball turf field is closest to 36th Street. The location of the 200 seat bleachers is not illustrated. The athletic area appears to include four tennis courts, five basketball courts and a square with graph lines that may be a swimming pool. There is an arrow labeled “existing gate” that appears to be located at Meyler. There is parking at the far left but access to it is unclear. (See attachment)

p. 2-7 School-Related Events. “The proposed Project would include after-school programs for students such as athletic activities, special-interest clubs, and extra-curricular activities. Additionally, the Proposed Project may have occasional nighttime and weekend events, some of which would be campus-wide, while other would be grade-specific events. The Proposed Project would include full-sized playfields for competitive athletics.” This contradicts the statements that athletic facilities would be used for non-competitive purposes only.

p. 2-7 Community Use. “Events may include community use of the playfields. . . Operation of school facilities for community use may occur outside normal school operating hours, generally between 3:00 pm and 10:00 pm on weekdays and all day on weekends until 10:00 pm.” Discussion of noise from the facilities (p. 3G-21) states “The proposed turf field and courts would be utilized during the day for physical education classes, and during break periods for student recreation. Noise from onsite school activities would be limited to typical school activities, such students participating in physical education and recreation activities. Such noise would be audible at the nearby residences, but would be of short duration and would occur during the typically less noise-sensitive daytime hours when school is in session.” There is no mention of the noise caused by community use and the hours given are NOT “less noise-sensitive daytime hours.”

p. 2-8 LAUSD Standards

Noise/Acoustics. “Where excessive noise from operation of the new or expanded school site could disturb adjacent residential uses, the Proposed Project may incorporate buffers, such as masonry walls, between playground and adjacent residential areas.” The word “may” gives affected residents no information on whether buffers will or will not be incorporated and thus no way to evaluate the true impact of the noise or the aesthetic impact of buffers.

Section 3D

Figure 3D-5 Proposed Project with Newly Created Historic District

This drawing shows a completely different configuration than 2-4 Conceptual Site Plan. Figure 3D-5 includes two full-sized playing fields instead of one and no parking area. Across from Emily and 36th running past Meyler is a baseball diamond; next to it is a soccer field. There is no illustration of the proposed bleachers discussed elsewhere. Above the two turf fields are five basketball courts. There appear to be no tennis courts. The drawing is unlabeled except for a description at the bottom which states “Looking northward from southern property boundary across fields to new campus. This image graphically illustrates the proposed complete campus organization.” It is difficult to evaluate the environmental impact of the proposed athletic facilities on single family homes bordering 36th Street without knowing what facilities will be built and where. (See attachment)

Section 3G. Noise

p. 3G-2 “In general, human sound perception in a community environment is such that a change in sound level of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level.”

In order to provide a noise baseline (p. 3G-4) for the DEIR, the noise levels were monitored on January 29, 2008 for 15 minutes (Table 3G-2. Summary of Noise Monitoring (Short Term) The monitoring began at 10:04 am. There is no description of the weather conditions on this date so it is impossible to determine if wind velocity was high or low and may have contributed to the reading. (footnote 224 on p. 3G-4 indicates that noise monitoring was conducted by Peter Hardie and Aaron Carter, with Jones & Stokes on January 28, 2008) Which date was it?

The monitoring location closest to the residences along 36th and Emily, Meyler, Parker and Cabrillo was located at 3602 Parker Street, south of Project Site. Throughout the document it is referred to as ST-2. The noise sources found at ST-2 were traffic, aircraft, birds, rustling leaves, distant children playing. The equivalent continuous sound level (Leq) was established as 47.9 dBs based on this monitoring result. Throughout the document 48 dB is used as a comparison figure to anticipated noise resulting from the proposed athletic facilities.

p. 3G-6 “The Environmental Protect Agency (EPA) has developed guidelines on recommended maximum noise levels to protect public health and welfare. Table 3G-4 provides examples of protective noise levels recommended by the EPA”

Effect	Level	Area
Outdoor Activity Interference and Annoyance	Ldn <55 dB	Outdoors in residential areas and farms and other areas where people spend widely varying amounts of time and other places in which quiet is a basis for use.

p. 3G-8 discusses the Los Angeles Noise Ordinance (Municipal Code): “The Los Angeles Noise Ordinance states that construction or other noise generating activities will not disturb the occupied sleeping quarters of any dwelling hotel, apartment, or other place of residence between 9:00 pm and 7:00 am, nor may such activity occur on or with 500 feet of residential property between 6:00 pm and 8:00 am on Saturday or federal holidays, or at any time on Sundays.” Please explain how the community use described below is not in violation of this municipal code.

p. 2-7 Community Use. “Events may include community use of the playfields. . . Operation of school facilities for community use may occur outside normal school

operating hours, generally between 3:00 pm and 10:00 pm on weekdays and all day on weekends until 10:00 pm.”

p. 3G-16 Noise from Operational Activities

The athletic facilities will cause increase traffic noise especially if parking is provided next to the facilities, Leavenworth (which runs parallel to 36th) is used as the primary access road or if any of the gates along 36th Street are opened up for pedestrians or cars. 36th Street, Emily, Meyler, Parker and Cabrillo are all listed as available parking for students (especially the evening adult school students) and community use of the school site, the 600 seat amphitheater and the athletic fields and courts. The DEIR does not address impact of this traffic noise on single-family residences to the south. The tables on p. 3G-17 and the table on p. 3G-19 addressing project traffic noise do not provide information for location ST-2. “*ST-2 was not used in the traffic analysis as no traffic data was available to make an accurate calculation.” How can the residents near ST-2 evaluate the effect of traffic noise on our neighborhood if no data is available for us to use to analyze the impact. Please provide us with accurate data so that an accurate estimate of the accumulative noise caused by SRHS # 15 can be made.

p. 3G-21 “The proposed turf field and courts would be utilized during the day for physical education classes, and during break periods for student recreation. Noise from onsite school activities would be limited to typical school activities such as students participating in physical education and recreation activities. Such noise would be audible at the nearby residences, but would be of short duration and would occur during typically less noise-sensitive daytime hours when school is in session.” This statement does not take into account afterschool recreational activities in which the fields and courts would be used constantly and for long durations from 3:00 pm to at least 6:00 pm. It also does not take into account community use on evenings and weekends. The average baseball, basketball or soccer game takes two hours or more. Noise generated during these games, especially if the bleachers are filled with spectators, would NOT be for a short duration. The impact would not be less than significant.

p. 3G-21 “The measurements used for analysis of impacts for Belmont High School would be comparable to noise levels generated by the outdoor activities (e.g. basketball courts) of the Proposed Project; measurements taken from the basketball courts during lunchtime were approximately 67.1 dBA Leq at approximately 50 feet. The closest sensitive receptor at the Proposed Project is approximately 450 feet from the courts, fields, and the swimming pool.” This statement is incorrect. There are residences located within 100 feet of the proposed fields and courts. “Based on the noise level measurements as identified in the Belmont High School project, and assuming that all fields and courts are being used simultaneously, the noise level at the closest sensitive receptor would be approximately 55 dBA.”

The Leq at ST-2 was established as 48 dBA. The increase in project noise levels is estimated at 55 dBA at 450 feet from the courts, fields and swimming pool. This is a difference of 7 dBA. The basketball courts alone are estimated at 67 dBA at 50 feet. The

difference between 67 dBA and 48 dBA is 19 dBA. We are requesting a new calculation of the increase in project noise levels to determine if “sensitive receptors” within 100 to 250 feet of the proposed fields and courts will experience “a significant increase of 10 dBA or more above ambient noise levels.” As stated on p. 3G-12, a significant increase of 10 dBA or more above ambient noise levels is considered to be a significant noise impact according to CEQA guidelines and LAUSD standards.

p. 3G-22 Bleacher Noise

“The Proposed Project is planned to include a turf field, courts and potentially a swimming pool, which would be utilized during the day for physical education classes, and during break periods for student recreation. The proposed field is planned to provide up to 200 bleacher-style seats. The closest sensitive receptor is approximately 150 feet from the proposed baseball field. The maximum sound level produced by a loud voice is approximately 74 dBA at 1 meter (3.28 feet). For 200 people, this corresponds to a maximum sound level of 80 dBA at 150 feet. Assuming that crowd cheers occur 25 percent of the time, this corresponds to an Leq value of approximately 74 dBA at 150 feet.” This estimate of 74 dBA at 150 feet is based on assumptions and not facts. It appears that 74 dBA was deliberately selected as the Leq value in order to claim that it was less than significant. A significant noise impact as defined by CEQA guidelines and LAUSD standards is “temporary or periodic noise levels above 75 dBA when measured at a distance of 50 feet from the project-related activity for school zones or other sensitive receptors within 500 feet of a project site.” (p. 3G-12). What if the crowd cheers 30%, 35% or even 40% of the time? This could significantly raise the Leq above 75 dBA.

“The noise level during the time of field measurements was approximately 48 dBA Leq at ST-2, the closest measurement location to the proposed baseball field. Crowd noise from the Proposed Project would be approximately 26 dBA louder than existing ambient measured noise levels. Bleacher noise would be clearly audible at the closest sensitive receptor, and would dominate the noise environment. However, the noise would be periodic and temporary in nature and would not violate any standards. Therefore, noise impacts from crowd noise would be less than significant.” We strongly disagree with your methods and conclusion of determining crowd noise to be less than significant to sensitive receptors. Please recalculate the Leq for crowd noise and provide us with detailed references that substantiate your conclusions.

Summary and Requested Action:

In general, our feeling is that the DEIR document is so flawed and contradictory because of conflicting information that we request that a new DEIR be issued and that we be granted a new 45 days time period to respond, given the CEQA requirements, to the new information that is given to us.

In response to the many questions and inconsistencies we have raised regarding the DEIR for SRHS #15 included in this letter, please include a list of high schools built in the last five years in neighborhoods that mirror ours. We are looking for other single family

residents who live in as close a proximity to athletic facilities (within 100 to 500 feet) such as those proposed for SRHS #15 so that we can interview them and ascertain what the environmental impact has been in terms of the reduction of their quality of life. In our case, we live in homes that include a great deal of outdoor as well as indoor living space. We enjoy gardening and sitting outside on decks enjoying our ocean views. We chose our homes because of the peaceful outdoor environment they have offered us. Most of our homes were built in the 1950's and 60's and many of us in the surrounding area have lived in our homes for 10, 20 or 30 years or more. Perhaps our fears of SRHS #15 are exaggerated or unfounded. Perhaps having multiple athletic facilities available not only to the high school on weekdays but also to the community evenings and weekends does not represent as great a noise and traffic problem as we are currently imagining. While the opportunity to express our concerns through the CEQA process terminates on October 10, we still have the opportunity to share our findings from interviewing others with the School Board as they vote to adopt a Statement of Overriding Considerations given noise and other factors that can not be mitigated below applicable thresholds of significance.

Please address all of the questions posed paragraph by paragraph and explain why so many inconsistencies and uncertainties exist in the August 2008 DEIR along with answers to all of the questions we have asked.

Thank you.

Signed:

Ann Stone
3606 S. Emily St.
San Pedro, CA 90731

Leslie and Craig Hoback
3602 S. Meyler St
San Pedro, CA 90731

Phillip Palacios
3602 S. Parker St.
San Pedro, CA 90731

David A. Pilon Ph.D.
3606 S. Emily St.
San Pedro, CA 90731

Tom and Claudette Vogelsang
3605 S. Meyler St
San Pedro, CA 90731

Jerry M. Smith
3605 S. Parker St
San Pedro, CA 90731

Betty Tobin
3603 S. Meyler St.
San Pedro, CA 90731

Joe Benich
3623 S, Meyler St
San Pedro, CA 90731

Edith G. Fenton
3514 S. Emily St.
San Pedro, CA 90731

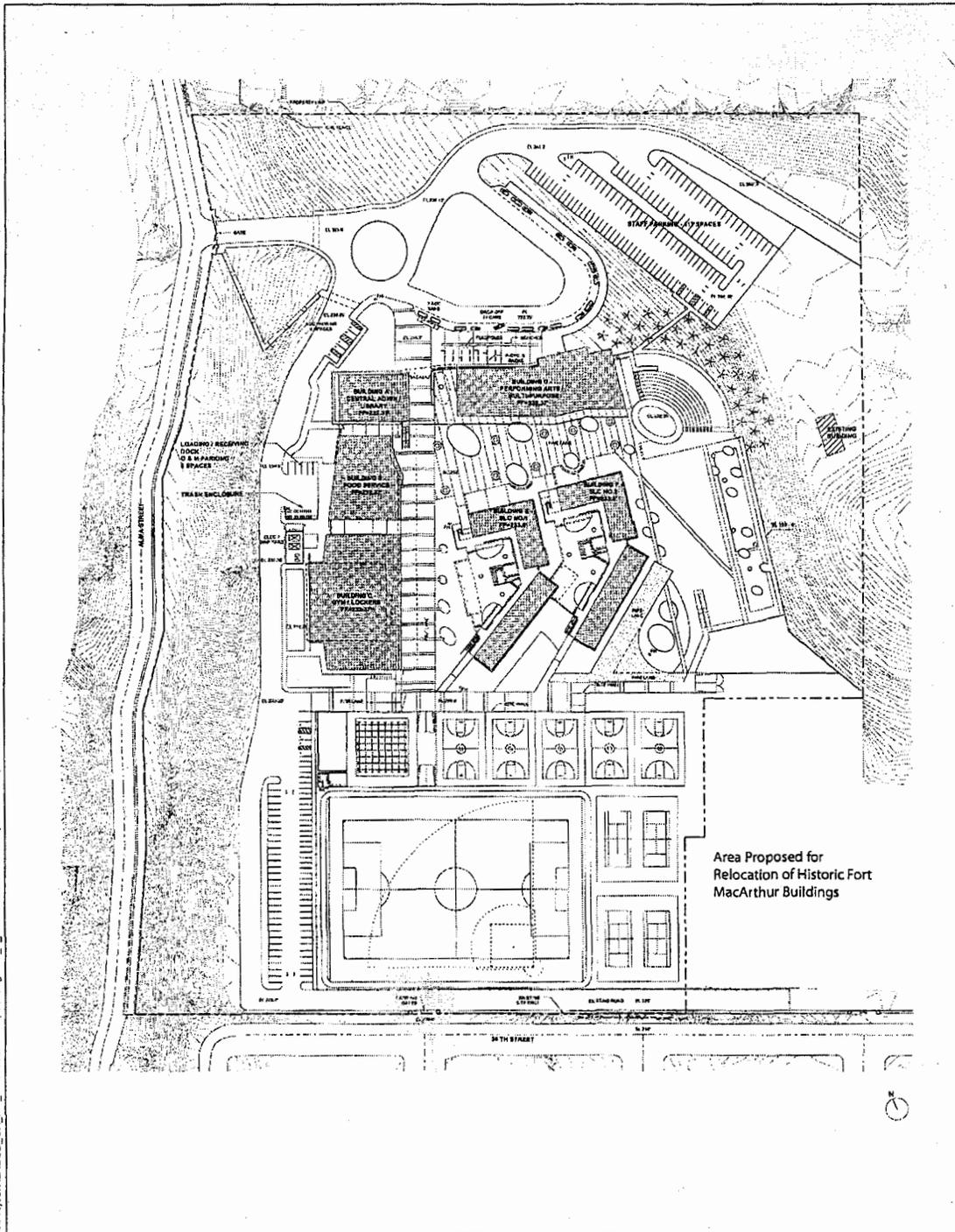
Ron Tobin
3606 S. Meyler St.
San Pedro, CA 90731

Gary Gladich
3622 Parker St.
San Pedro, CA 90731

(See signatures of the
above in the included
attachments.)

Pam and Harry Meisel
3603 S. Cabrillo Ave
San Pedro, CA 90731

Mike McCormick
3602 S. Parker St.
San Pedro, CA 90731



SOURCE: CO Architects



Figure 2-4
 Conceptual Site Plan
 Proposed South Region High School No. 15

Please add my name and address to Ann Stone's response to the LAUSD about the impact of noise resulting from the proposed SRHS #15 high school (and particularly the athletic facilities planned to be built along 36th Street between Emily and Cabrillo) described in the Draft Environmental Impact Report dated August 2008.

(BETTY TOBIN) Betty Tobin 3603 S. MEYLER S.P. 90731 10-7-08
(RONALD TOBIN) Ronald John 3603 S. MEYLER S.P. 90731 10-7-08
Leslie & Craig Hoback Leslie Hoback 3602 S. Meyler St SP. 90731 10-7-08
Tom & Claudette Vogelsang 3605 S. Meyler St SP 90731
Joe Benich JOE BENICH 3623 S. MEYLER ST S.P. 90731
Gary Gladich 3622 PARKER ST. S.P. 90731
Mike McCormick MIKE MCCORMICK 3602 S. Parker St SP. 90731
Phillip Paracias PHILLIP PARACIAS 3602 S PARKER ST SP 90731
Jerry M. Smith JERRY M. SMITH 3605 S. PARKER ST. 90731
Edith A. Fenton E.G. Fenton 3614 Emily St SP. 90731
David A. Pilon David A Pilon 3606 S. Emily St SP 90731

Please add my name and address to Ann Stone's response to the LAUSD about the impact of noise resulting from the proposed SRHS #15 high school (and particularly the athletic facilities planned to be built along 36th Street between Emily and Cabrillo) described in the Draft Environmental Impact Report dated August 2008.

Pam + Harry Meisel
3603 S. Cabrillo Ave
S.D., CA 90731

Pamela Meisel

RECEIVED
South Coast Region

NOV 19 2008

CALIFORNIA
COASTAL COMMISSION

OPPOSED

LAUSD's application for Co.
Development Permit: SRHS

Permit Number 5-08-251

APN(s) 7469-017-900

November 14, 2008 Agenda Item NO. 18D

(Postponed)

Ann Stone, 3606 S. Emily St.,
San Pedro, CA 90731

EXHIBIT NO.
Application Number
California Coastal Commission

2

John Ainsworth
Deputy Director for Los Angeles County
California Coastal Commission
South Coast District
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

Dear Mr. Ainsworth,

I am writing in opposition to LAUSD's application to build a high school for 810 to 1200 students as well as extensive athletic facilities on the property at 3210 South Alma in San Pedro. LAUSD proposes building this high school while at the same time expanding the Point Fermin Outdoor Education Center and moving the existing Continuation School and Early Learning facilities to the parking lots currently used by the Oiled Bird Center, Marine Mammal Center, military museum, church and Native American ceremonial locations as well as activities at Angel Gate Park. On page 4 of LAUSD's application they checked NO in the box under question 9 asking "Is any existing parking being removed?" I can not be certain but it looks like this move may cause a net loss of overall parking for all the facilities in the area.

As a 15 year resident of a single family home within 100 feet of the proposed high school and other facilities, I am concerned about the noise and congestion (detailed in my attached response to the DEIR) but I am also concerned about the increased litter caused by more than 1,000 new people coming to this property everyday. Currently, the Continuation School has only 50 to 60 students and 36th Street between Emily and Cabrillo is lightly traveled. Yet we are constantly picking up bottles, cans and fast food containers tossed near the storm drains along this stretch. I can only imagine how much trash will travel to the ocean through these storm drains if the high school is built. If these drains are compounded by increased litter in the storm drains on Alma, 37th Streets and other affected streets, this will have a significant polluting effect on our ocean. My understanding is that one of the greatest threats to our coast and our ocean's ecology is the litter and debris that pollutes it via storm drains.

I am also concerned because LAUSD keeps adding things to this parcel without removing anything. In its DEIR for the high school it didn't mention the impact or the potential incompatibility the high school could have with the Point Fermin Outdoor

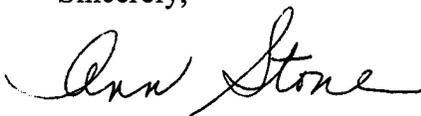
Education Center or moving the Continuation School and Child Care Center to the parking lot area next to the Oiled Bird and Mammal Rescue centers. By the way, on page 5 of their application, LAUSD checked the NO box for question 3: Has any application for development on this site including any subdivision been submitted previously to the California Coastal Zone Conservation Commission or the Coastal Commission. I believe that the Point Fermin Outdoor Education Center did apply to the Coastal Commission, or at least the DEIR for PFOEC indicates they did.

The neighborhood surrounding the proposed SRHS # 15 is **opposed** to the new proposed high school and its many athletic facilities but it **hardily supports** the Point Fermin Outdoor Education Center and the incredible opportunity it could offer 10.000 to 20.000 children each year who would attend the center, spend the night, get to escape their dense often treeless urban environments to relax, listen to nature, visit the tidepools, the mammal rescue center, the Cabrillo aquarium. There is an opportunity to preserve this land for all children to teach them about nature. Once it is gone; it is gone forever. Currently views of Catalina, nightly stars not destroyed by bright lights, and enough quiet to hear harbor seals and even owls exists and is available to share. An effort to restore coastal sage scrub and other vegetation planned in conjunction with the Point Fermin Outdoor Education Center will guarantee thousands of children a rare and valuable natural experience. This can not happen if the PFOEC is squeezed in next to a high school that is mainly buildings, athletic fields and asphalt.

I appreciate the Coastal Commission, your mission and the good work you do under difficult circumstances. I know you are short staffed and have many issues to address. My request is that you walk the property proposed for SRHS # 15 and see, first hand, the wonderful views, the potential for education in coastal land recovery and imagine the experiences 5th graders and other students could have living biology and ecology at this remarkable site. As I said before, once it is gone; it is gone forever.

I have attached the comments I made to LAUSD regarding their DEIR for the high school and the need for clarification. Thank you for listening to my concerns and please let me know at annkstone@cox.net when the hearing for SRHS # 15 originally scheduled for November 14 in Long Beach is to be re-scheduled.

Sincerely,



Ann Stone
3606 S. Emily St
San Pedro, CA 90731

P.S. I haven't sent this letter to any commissioners and hope that you will share it with them before they are asked to approve the application for SRHS #15. Thanks.

Gary Gladich
3622 Parker St.
San Pedro, CA 90731

EXHIBIT NO.
Application Number
California Coastal Commission

Nov. 2, 2008
California Coastal Commission
PO Box 1450
200 Oceangate, 10th Floor
Long Beach, CA 90802-4416

CALIFORNIA COASTAL COMMISSION (3)

Agenda No.: F8b
Application No./Permit No.: 5-08-251

Dear members of the California Coastal Commission,

The purpose of this letter is to express my strong opposition to the proposed construction of the SRHS#15 project. Firstly, as a parent, I would be very happy to have a new school for my child to attend, however, I cannot support a school that is neither needed nor wanted in our community, but is also to be built on land of questionable integrity. The construction of this school will create an unhealthy and unsafe environment for students and residents alike. There is a strong body of evidence to reinforce the growing concerns of local residents. Education is of monumental importance, however, the building of new schools knowing full well that there are no means available for the actual maintaining of them is just plain irresponsible. The allocation of monies for new construction (through Tax Bonds) does not necessarily mean that spending in such a manner is fiscally sound and responsible thinking, particularly given the current financial crisis of the State.

Listed here are a few of my major concerns about the proposed SRHS #15:

- "PREFERRED SITE": Not only is this site of health and environmental concern, but also of historical importance. Fort MacArthur was established during World War I and was continually in operation until closing in 1974. There are documented photos of munitions testing and questionable landfills within the site area. The existence of underground tunnels and bunkers coupled with the Cabrillo Fault running through the area should be more than enough reason to discourage the use of this site.

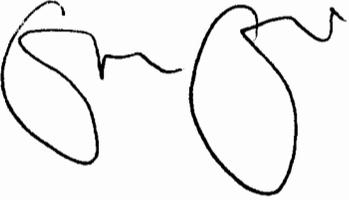
My guess is that the Government gave LAUSD the land because they knew it would be too costly to

clean up for habitation.

- **TRAFFIC:** Bus, auto and delivery truck traffic would create numerous safety concerns as well as cripple our local streets which are not designed to support this sort of traffic density.
- **PARKING:** LAUSD's unwillingness to negotiate its stance on parking- insisting that 2.5 parking spaces per classroom is more than adequate. Where will students and, sporting and amphitheatre event crowds park?.....in our neighborhoods!
- **NOISE:** The coastal area of San Pedro is very, very quiet. The school site lies adjacent to a gully which amplifies all noise levels coming from this area. The noise associated with sporting events, an amphitheatre and just the regular daytime activities of a school will destroy the tranquility of this area.
- **LIGHTING:** The coastal area around the school site has very little lighting; there are only two street lights on my two block street. The peace and tranquility of our evenings (the main reason why most of us live out here) will be adversely affected by lighting associated with evening sporting and amphitheatre events.
- **COMPATABILITY:** There are currently two Marine Wildlife Rehabilitation Centers operating within the proposed site which will suffer most directly from the influx of 800+ teenagers. These are wild animals that require specific conditions for successful rehabilitation that would be adversely affected by such humanity. The Point Fermin Outdoor Education Center is another facility which currently conflicts with the proposed site (overlapping site plans!). This center has already had its final EIR issued back in March '06. The Center is intended to provide inner-city 5th graders with an outdoor experience that will hopefully have a positive impact on their lives and instill a sense of environmental respect and awareness. What kind of "experiences" are these kids going to have with the distractions associated with 800+ teenagers and sporting/amphitheatre events occurring next door? These two facilities cannot coexist with this proposed school if the goals of all of the facilities are to be achieved.

LAUSD is used to bulldozing it's way through communities. The EIR issued on this project is an absolute joke. It's blatantly obvious where these so-called "environmental consultants" loyalties lie. These people don't want to bite the hand that's feeding them. The combination of money, ego, zero

accountability and control of the system leaves them holding all of the cards...with the exception of one; the Coastal Commissions acceptance of the project. It's time for Goliath to fall. I ask for your serious consideration of all the facts on this much contested project. LAUSD has neither done nor said anything in good faith from the beginning. Thank you for your time.

Sincerely, 

October 6, 2008

Ms. Grace Estevez, Project Manager
LAUSD Office of Environmental Health and Safety,
1055 W. 7th Street, 9th Floor,
Los Angeles, CA 90017

RECEIVED
South Coast
NOV 19
CALIFORNIA
COASTAL COMMISSION

EXHIBIT NO.
Application Number
California Coastal Commission

Re: South Region HS #15, 56.40092, Comments on Draft Environmental Impact Report

To Whom It May Concern:

The following pages include comments to the Draft Environmental Impact Report (DEIR) for the South Region High School No. 15 (SRHS 15) project with a proposed location on the Upper Reservation of Fort MacArthur in San Pedro, California.

Comments on Section 3C. Biological Resources

An overall comment about the SRHS #15 DEIR is that when it discusses Biological Resources at the site there is no mention of the impact of the Point Fermin Outdoor Education Center to be co-located with the proposed high school. The Environmental Impact Report for the Point Fermin Outdoor Education Center improvements (also prepared for LAUSD by Jones & Stokes) was certified by Board of Education on May 9, 2006. Because the PFOEC DEIR pre-dates the current SRHS #15 DEIR and because the project is scheduled to be completed and operating as early as Summer, 2009, the accepted plan for the center needs to be considered in "the potential impact on biological resources including the habitat assessment, vegetation mapping and general botanical and wildlife surveys within and immediately adjacent to the project site that were conducted by ICF Jones & Stokes staff" in the DEIR for SRHS #15.

SRHS #15 DEIR 3C.2: Environmental Setting p. 3C-1

"The Proposed Project site contains approximately 40 buildings, some of which are historical. Included on site are buildings that house the Angels Gate Continuation High School and the Wilmington/San Pedro Early Education Center and Skills Center. Various maintenance and equipment storage is provided in the former military buildings and portables. A chain-link fence and short masonry wall is present along the south and west project site boundaries (36th Street and Alma Street frontages, respectively). A chain-link fence is also present in the back of the private residences on West 30th Street along the north property boundary. The east boundary of the site is open to the Battery Barlow Saxton and Angels Gate Park areas. The majority of the Proposed Project site consists of grass fields that are maintained by mowing. The central portion of the site contains an athletic field, which is surrounded by concrete and asphalt roads and slabs, various buildings, and storage containers with associated ornamental landscaping and ruderal (dominated by weeds) habitat in areas that are not regularly mowed."

that support the California State Science Standards to help students understand the interrelationships of living and the physical components of the environment.”

PFOEC p. 2.2 Project Description

Proposed Facilities:

“The proposed improvement to the existing Point Fermin OEC include construction of two new student dormitories and a residence building for staff and visiting classroom teachers. . . A new outdoor ecological teaching facility and landscaped area would be provided.”

“The landscaping element of the project includes trees for shade, wind protection, and screening from nearby residences as well as a landscape garden that would include different vegetation communities such as coastal scrub or wetlands, and other native and non native plants. Figure 2-3 shows proposed landscape plan.”

Conclusion:

Figure 2-3 Landscape Plan shows a large area of coastal sage scrub (CSS) to be planted all along the area that would adjoin the proposed high school. It includes pine trees, grassland/meadows, oak woodlands/oak savanna, chaparral and coastal sage scrub. Many of the “less than significant impact” findings in the SRHS # 15 DEIR were based on these plants and vegetation **not** being present in the area surrounding the proposed SRHS # 15. Given this omission, it is impossible to determine the true impact on biological resources resulting from building SRHS #15 at its proposed location and further studies need to be done to adequately address this omission.

Sincerely,

Ann Stone
3606 S. Emily Street
San Pedro, CA 90731
annkstone@cox.net

cc: David Myers, Executive Director
The Wildlands Conservancy
39611 Oak Glen Road, Bldg. #12
Oak Glen, CA 92399

This “Environmental Setting” is used for purposes of discussing potential impact on biological resources. This description does not mention the Point Fermin Outdoor Education Center either in its present state or as it is planned. This is a serious omission because a great deal of the “less than significant impact” statements are based on the lack of coastal sage scrub (CSS) and other biological resources on the site and in surrounding areas. This omission does not take into account the extensive planting of coastal sage scrub (CSS) and other vegetation planned by the PFOEC and approved of by the School Board in their EIR.

For example, in SRHS #15 DEIR p. 3C-3, Table 3C-1: Species and Habitat Types with the Potential to Occur in the Project Vicinity, the lack of CSS is cited as a major reason that Lyon’s pentachaeta, Palos Verdes blue butterfly, South Coast saltscale and Davidson’s saltscale have low potential for occurring on the project site or its surrounding areas. The lack of coastal sage scrub is referred throughout the document along with the lack of chaparral, grasslands and tall trees all planned for the PFOEC.

In order to further understand the significance of omitting any reference to the Point Fermin Outdoor Education Center (PFOEC) and the impact of SRHS # 15 on its biological resources it is essential to review PFOEC’s mission, purpose, approved plan and its funding as explained in their DEIR. Please note the following:

PFOEC p. ES-9: New Construction with Relocation of Building 852 Alternative

“The proposed plan utilizes all of the fort’s available open space . . . The grant that was award to construct the project requires that a large portion of the undeveloped area would be restored to its natural environment, bringing trees and other plants back that would begin to attract animals to the site.” (The grant referred to the PFOEC DEIR is from The Wildlands Conservancy and was accepted by LAUSD to “fund construction, restoration, landscaping and re-vegetation of the Point Fermin site, location in San Pedro.” (Source: News Release from LAUSD Office of Communications 12/14/2006)

PFOEC p. ES-9: Alternative Eliminated from Further Consideration

“No other site in the area could provide such a unique environment that provides an outdoor laboratory and classroom setting in which to study the natural ecosystem along the California coast. There is no other location upon which this project could be situated to meet this objective.”

PFOEC p. 2-1 Project Background and Environmental Setting

“The Point Fermin OEC is part of LAUSD’s ‘Beyond the Bell’ (BTB) program, which provides educational opportunities for LAUSD students supported in part by facilities at Fort MacArthur. The mission of the BTB Outdoor Education Program is to provide active programs in environment education and human relations that would develop a cooperative spirit, a positive self-esteem, and a sense of common responsibility for the future of life on Earth. The program utilizes the natural environment to convey lessons

NOISE
P.O. BOX 5151
SAN PEDRO, CA 90733-5151

EXHIBIT NO.
Application Number
California Coastal Commission

5

STEVE BLANK
CALIFORNIA COASTAL COMMISSION
45 Fremont St.
suite 2000
San Francisco, CA 94105

OPPOSED

Re: LAUSD's application for Coastal Development Permit: **SRHS #15**
Permit Number 5-08-251
November 14, 2008 Agenda Item No. **F8b**

Dear Mr. Blank,

Our organization, "Neighborhoods Organized and Involved to Support Education", is opposed to the building of SRHS #15 at the proposed site of Angel's Gate in San Pedro. These reasons are detailed in our response to the Draft Environmental Impact Response which is enclosed. Our objections are summarized below.

- LAUSD's **traffic** analysis is seriously flawed:

1.) The analysis presumes that half of the traffic will enter at the Gaffey/32nd Street entrance and the other half at the Alma/Main Street entrance, ignoring several practicalities (See DEIR: Figure 3J-4): the classrooms are much closer to the Alma Street entrance, the Gaffey/32nd Street entrance requires circumnavigation of the Point Fermin Outdoor Education Center, causing extra time to get to school; the Gaffey/32nd street entry road is very narrow, hilly, curvy and view obstructed; the Gaffey/32nd Street exit is dangerous—Gaffey is a busy, hilly and curvy street. (See attached photos of Gaffey/32nd Street entrance.);

2.) The analysis presumes an agreement with Parks and Recreation to use Barlow-Saxton road; however, at the time of this letter, LAUSD had NOT reached an agreement with Parks and Recreation regarding this road.

3.) The analysis presumes that the half that enters on Alma Street will arrive/depart only from north of the Alma/Main Street entrance. (See DEIR: Figure 3J-4: Project Trip Distribution.) However, this ignores the reality that Alma, north of the Alma/Main Street entrance, travels through a residential area consisting of both apartments and houses with limited street parking making it narrow and congested. It is not as congested south of the Alma/Main Street entrance because there are portions which have no housing at all. To avoid north Alma, drivers will enter Alma from 37th Street, arriving there via Western Avenue, Gaffey, or Pacific, onto Paseo del Mar.

This will **significantly increase traffic along Paseo del Mar and aggravate parking concerns.** (See further analysis in “Comments”, pp. 38-45.)

4.) The traffic analysis failed to consider the cumulative affect of SRHS#15 traffic in relation to PFOEC which will expand its operation on the same property to 13,000 children per year. PFOEC’s entrance is also listed as Alma/Main Street. (See “Comments”, pp. 44-45.)

The analysis is based on 810 students attending the school plus teachers and administrative staff. As stated below, this is misleading. The likelihood that the school will serve 1200+ students will further aggravate traffic and noise.

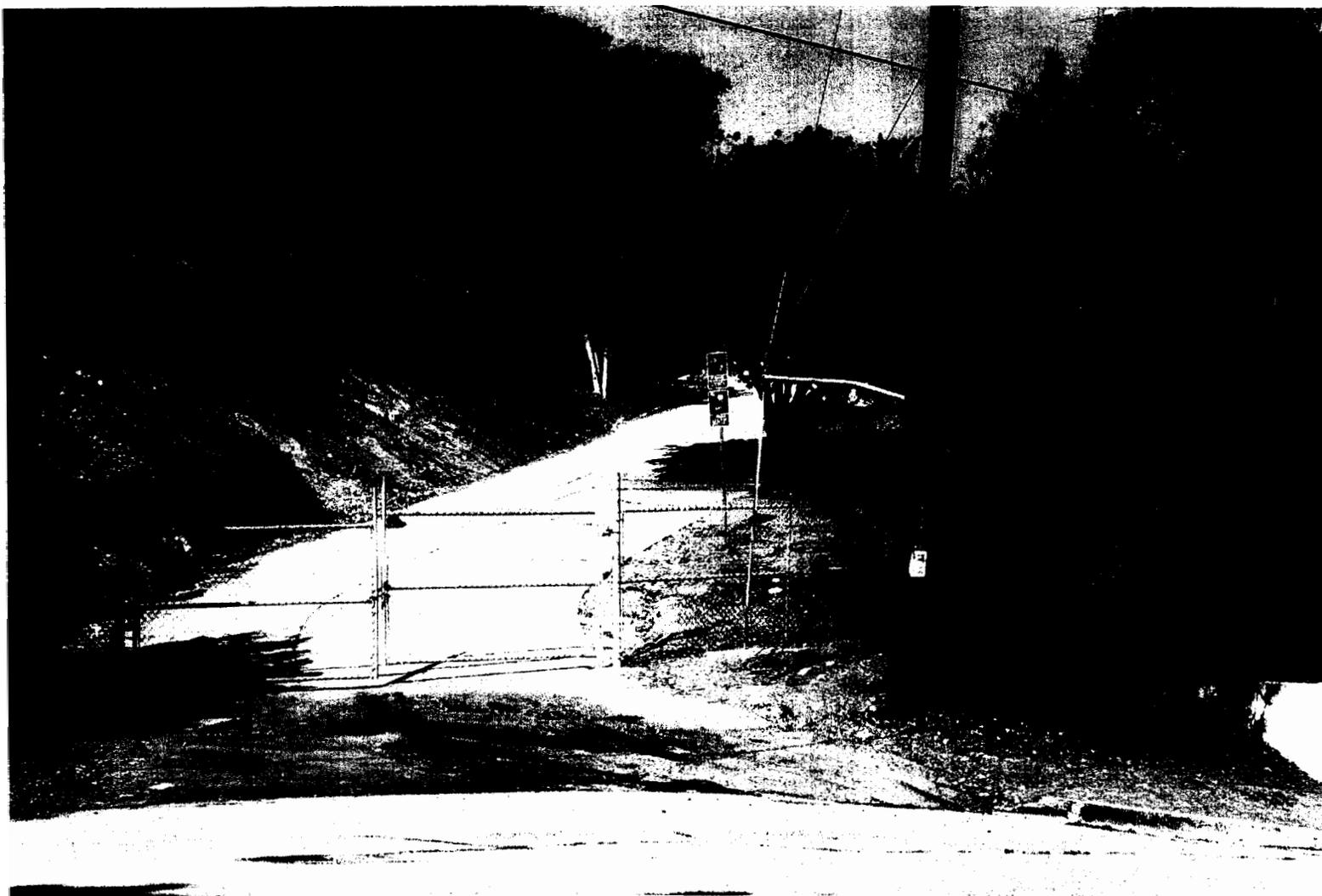
- We oppose the 36 **wind turbines** on the basis of noise, visual blight, safety to the residents, and close proximity of the turbines to the coast and migrating bird populations. (See “Comments”, pp. 9-10.)
- The **scenic quality and views** will be significantly impacted. This was not fully analyzed and discussed in the DEIR. Views of the ocean will be impacted. (See “Comments”, pp. 13-19.)
- **Water quality** in the ocean will be negatively impacted due to the necessary grading and evacuation required as a result of building SRHS#15 on an old military/munitions site. (See “Comments”, pp. 30 and Attachment 8. Also, see LAUSD’s Preliminary Environmental Assessment of this property listing the poisons in the soil.)
- LAUSD’s **noise** analysis is seriously flawed. Further, it fails to consider the cumulative effect of PFOEC with SRHS #15. (See “Comments”, pp. 31-35.)
- **Air quality** will be severely and negatively impacted due to 800-1215 students delivered/picked up daily aggravated by transporting 13,000 PFOEC students to the same site. This particular area of San Pedro already has significant pollution. The choice of a school site at the very tip of San Pedro to serve future high school students who live at the other end of San Pedro does not seem well-considered. (See “Comments”, pp. 22-29.)
- **Student Population will be 1200 students:** The original definition of the proposed project was for 1210 students and 30 classrooms. Subsequently, LAUSD attempted to redefine the project to serve 810 students, but did not reduce the classroom size. This amendment was rejected by LAUSD’s Bond Oversight Committee, leaving the 1210 student proposal in place. Further, filling each of the 30 classrooms with what are typically 40 students per classroom leads to 1200 students. (See enclosed “South Region High School #15 Environmental Impact Report Comments”, hereinafter “Comments”, pp. 2-3.)

Thank you for your consideration in this matter.

Very truly yours,

NOISE

Noise.ccc.letter.2



Gaffey / 32nd St
Entrance



Gaffey / 32nd St
entrance



Looking North
on Gaffey Street
from Gaffer / 3200 Sr entrance

SOUTH REGION HIGH SCHOOL #15 ENVIRONMENTAL IMPACT REPORT COMMENTS

- Page ES-1, third paragraph: This paragraph references specific "district-wide objectives" and the source document for these objectives as the 2008 *Strategic Execution Plan*.
 - We have reviewed the *Strategic Execution Plan* on the District's website and do not find these objectives specifically identified in the document referenced. Please discuss.
 - The third bullet point specifies a project objective to "implement full-day kindergarten classes district-wide". How is this objective relevant to the proposed high school (SRHS#15)? Please describe.
 - The first bullet point specifies a project objective to "eliminate involuntary busing". Please inform the public how many students are involuntarily bussed out of San Pedro to attend other high schools.
 - The project is intended to relieve overcrowding at San Pedro High School. Please discuss how opening a magnet school for 360 San Pedro students will significantly relieve overcrowding at San Pedro High School. (See 9/4/2008, public meeting with LAUSD minutes, page 53.) Please discuss why POLA is not more fully utilized. Please discuss the anticipated enrollment of San Pedro High School when your research and websites indicate that enrollment is declining. See Attachment 1.
 - This project is intended to relieve "overcrowding" at San Pedro High School. The public has been led to believe that this will mean smaller class sizes, a laudable goal and sure to make the education of our youth more effective. Yet at the public meetings, Dr. Vladovic has continually stated that the construction will not relieve inside classroom overcrowding because there is no money to employ teachers. Please discuss.
 - Fourth bullet specifies a project objective to "maximize the use of limited bond funds to provide needed classroom facilities". Please discuss how a \$102 million project will

maximize the use of limited bond funds when there are less expensive alternatives, as provided in "Alternatives": Fully utilize Cooper, remove bungalows at San Pedro High School and replace with brand new building. We further dispute assertions made to the community that this bond money can only be used in new construction, when that is not the language in the bond and in fact, one of the alternatives suggested in this response would be removing the bungalows at San Pedro High School to construct a new building.

- o We have received conflicting information regarding this Proposed Project. It initially began as a high school for 1215 students. The Proposed Project Definition was reduced to 800+ students, with a discussion of limiting the student population to 500. However, the number of classrooms remains at 30. If the current class size of approximately 40+ students remains the same, this means that the potential student population remains as originally articulated: 1215 students. Please discuss the capability of LAUSD to increase the number of students from 500 to 810 to 1215 at any time they choose. This circumvents the CEQA process. Further, this DEIR should be redrafted and recirculated: 1215 students will substantially impact aesthetics, pedestrian safety, traffic and noise.
- o Further, the proposed project is to have a gymnasium, dance studio, amphitheater, soccer/playing field, tennis courts, basketball courts, and extensive administrative offices. However, the community has been told that the proposed project will be an annex and magnet of San Pedro High School. If this is true, why is it necessary to have all of these facilities? If it is to be a magnet, open to enrollment for other LAUSD students and only reserving 300 "magnet seats" for San Pedro High School students, how will this solve the San Pedro High School student population problem. Please discuss.
- o Further, the School Construction Bond Citizen's Oversight Committee, at its June 18, 2008 meeting, failed to adopt LAUSD's proposed revision of the project definition for SRHS#15 from 1215 seats to 810 seats. As stated in the Board of Education Report No. 473-07/08,

dated June 24, 2008: "Non-approval of the project redefinition would require staff to proceed with the current project definition of 1215 high school seats, which would provide more seats than needed to meet the two-semester goal." See attachment 2. Please discuss these discrepancies. The DEIR should be redrafted and recirculated to consider what seems to be the real projected student population of 1215 students in regard to noise, traffic, pedestrian safety and aesthetics.

- Page ES-2: "The primary purpose of CEQA is to inform the public and decision makers of a project's potential impacts and to allow an opportunity for public input to ensure informed decision-making." This DEIR is ambiguous, conclusionary, vague and lacking in details making impossible CEQA's stated purpose of informing the public and promoting informed decision-making to be achieved.
- Page ES-2, first full paragraph: We understand that CEQA requires the EIR to examine "any reasonably foreseeable future phases". The DEIR does not address this matter at all. Please discuss. The DEIR does not address the specifics of construction or operation, except in cursory statements. Please fully discuss.
- Page ES-2, Use of the Program EIR: Our comment letter of May 1, 2008 pointed out that the Initial Study/Notice of Preparation (IS/NOP, March 2008) did not adequately discuss the relationship of the proposed project to the Program EIR (PEIR). We understand that the PEIR can be referenced in subsequent environmental reviews; however, there was nothing in the PEIR suggesting the need for a new high school in the southern portion of Local District 8 (aka, District K). Since the DEIR essentially repeats the language in the IS/NOP, we request that the need for the proposed high school be fully explained in the DEIR. If student/population projections have changed since the 2003 PEIR was certified, please describe. Also, please discuss the need for a new high school at the edge of the service area in relation to: 1. where the anticipated future San Pedro high school population currently resides, specifically north and northwest San Pedro in comparison to the Palisades area where it is believed the population is composed primarily of retirees and

families having relatively fewer high school age children; and, 2. demographics suggesting that LAUSD student population is decreasing. See attachment 1.

- Page ES-2, first paragraph in Section ES.3: This paragraph references that the New School Construction Program calls for 165,000 new classroom seats. The footnote (#4) references *The New School Construction Program FEIR* as the source of this information. We note that the same discussion in the Initial Study stated that 180,000 new classrooms would be provided. The footnote (#3) in the Initial Study also references the PEIR as the source. We are confused that different information is based on the same source document. Please discuss this discrepancy.
- Page ES-3, Project Objectives: The last bullet point in this section has been added since the publication of the IS/NOP in March 2008. This significant new objective calls for installation of "renewable technology" that will generate 15 megawatts of power to help reduce greenhouse gas emissions, as mandated by AB 32. This important legislation was signed into law on September 27, 2006, a full year and a half before the IS/NOP was issued. While we applaud the District for proposing renewable technology at this new facility, we believe the last minute addition of such a fundamental project objective is symbolic of a project that was ill-conceived at its outset. Additionally, we believe this to be an attempt by the District to ambush the surrounding community by including a major design feature without the benefit of review during the IS/NOP process. This circumvents the purpose of the CEQA process.
- Page ES-3, Project Objectives: Stated objective is to provide neighborhood evening adult school uses as part of the Proposed Project. The discussion of this objective lacks details and information so as to understand the project's full impact as it relates to noise, traffic, and aesthetics. Please detail the anticipated course material of the adult evening classes.
- Page ES-3, Project Objectives: Stated objective is to provide 415 seats for neighborhood evening adult school. Please provide the evidence which supports the need for evening adult school in this neighborhood and detail the methods used to gather this evidence. Please define "neighborhood": define its boundaries and anticipated attendance

- Page ES-4, Section ES.6 Project Description: The description of the proposed project in this section and in Chapter 2 (Project Description and Environmental Setting) is not adequate for "informed decision-making" as set forth in CEQA or on page ES-1 of this document. Specifically, the document continually makes general references such as: "are planned", "may be included", "may be developed", "would be provided", "would be abated", "would be removed and disposed of", "would be completed", "would be clearly marked". The following areas are deficient in concrete details: pedestrian and vehicular access along Alma street and Gaffey Street, the drop-off areas, construction details, soil remediation, installation of barriers during construction, mass grading and compaction, trenching, new access roads and driveways added, new sidewalks built on Alma Street, landscaping, site fencing, walls and any final work. Please provide specific details for each of these items. (See 9/4/2008 minutes, page 84, Mr. Alve's comments, supra.)
- Page ES-5, first paragraph: The Proposed Project Description indicates that there will be a 600 seat amphitheatre. Please describe the anticipated use of this amphitheatre: define "informal recreational use", will it be used at night, will it have speakers, what will be the lighting system for the amphitheater, will it be used by the community and for what purposes. Please discuss why 600 seats are needed when Dr. Vladovic is stating that the school will be for 500 students, and the School Board voted in favor of "small schools." (See 9/4/2008 LAUSD minutes, page 8; see also: Daily News, February 10, 2008: 'Small Schools and Small Learning Communities'.)
- Page ES-5, first paragraph: The Proposed Project Description indicates that a swimming pool "may be included". There is no further discussion of details of who would use the swimming pool, what hours, what would be the access to this pool. Please include these details. Also include the Memorandum of Understanding with the City of Los Angeles. Then, redraft and recirculate the DEIR.
- Page ES-5, fourth paragraph: The Proposed Project suggests pedestrian and vehicular access along Alma Street. However, at the September 4, 2008 public meeting, Dr. Vladovic indicated

that "some of my concerns are using Alma to this school. I've had Facilities studying the closure of the Alma entrance or, at least, not using the entrance during peak hours." Please include details of this study and the conclusions. (See 9/4/2008 LAUSD minutes, page 7.)

- Page ES-6, Project Impacts: We are pleased to note that LAUSD has included a discussion of biological resources in the DEIR; however, we are dismayed that a decision was made to exclude a discussion of geology/soils. We pointed out in our comments on the Initial Study several important issues related to geology and we find it astonishing that the decision was made not to respond to the controversial issues such as:
 - Regional seismic characteristics, including the Palos Verdes Fault and San Pedro Escarpment Fault
 - The Cabrillo Fault is within 0.1 kilometer of the site. This fault is generally acknowledged to be capable of generating an earthquake event of 6.5 magnitude
 - Soils (fills and surficial deposits) that may not be suitable for structural support, as stated in the geology study prepared by MACTEC, 8/30/2007.
- Page ES-6, Section ES.7, Proposed Project Impacts: It has been determined by LAUSD that the Proposed Project would have a less than Significant Impact on Recreation and Parks. The DEIR does not discuss the cumulative impact of the proposed project, proposed enlargement of the Point Fermin Outdoor Education Center (PFOEC) and the proposed expansion of Angel's Gate Cultural Center (AGCC) on Recreation and Parks.
- Page ES-7, Section ES.7.2 Cumulative Impacts: This paragraph states that certain impacts would be cumulatively considerable when combined with "*other LAUSD projects*". The intent of the Cumulative Impact analysis is to include any projects, including reasonably foreseeable future projects, that "*when considered together, are considerable or which compound or increase other environmental impacts*", not just LAUSD projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. CEQA Guidelines, Sections 15130(b)(1)(A)-(B), 15130(b)(2), and 15355; Pub. Resources Code, Section

21100,(e). Cumulative impacts should include discussion of Port enlargement projects, particularly as it relates to Air Quality, the new cruise terminal, Trapac expansion of the port, proposed construction at Ponte Vista, the proposed Marymount College expansion, Terranea (Long Point Resort Project) luxury hotel and golf course, and the enlargement of PFOEC and AGCC.

- Page ES-7, Section ES.7.3 Growth-Inducing Impacts: Reference is made that construction of the Proposed Project is intended to relieve the current overcrowding conditions at **“other nearby schools and to provide capacity for projected students who would live in its attendance areas...accommodate growth that already has occurred and that will continue to occur over time.”** Please provide documentation to support these claims, particularly in light of LAUSD's own research and websites which indicate that enrollment is declining. See Attachment 1. Further, please discuss what other schools, besides San Pedro High, will be relieved of their current overcrowding as a result of the Proposed Project.
- Page 2-3, first partial paragraph: This paragraph refers to four other sites that were studied prior to the proposed site being selected. However, the DEIR does not identify the other sites that were considered, nor does the DEIR discuss the site selection criteria or the rationale for selecting the proposed site. Moreover, the minutes of the May 22, 2007 Board action is not available for review on the LAUSD website. While we understand that the Board has selected the proposed site as its preferred location for the new high school, we believe the process is fundamental to ensure informed decision-making. The DEIR should discuss these sites in the Alternatives Analysis.
- Page 2-3, Section 2.3.1 (Location): The project location description is misleading. Please clarify that the project is not bounded on the *“north by West 30th Street”*, but by the rear property lines of homes fronting on West 30th Street.
- Page 2-5, Section 2.4 Project Description: The Proposed Project provides 810 seats for students. Dr. Vladovic stated at the 9/4/2008 meeting that “no new school is going to be over 500

(students) anymore" and that he got the Board to pass a Small Schools Motion. (See 9/4/2008 LAUSD public hearing minutes, page 8.) Please reconcile.

- Page 2-5, General Plan Designation and Zoning: This section should define how the project is compatible with General Plan policies and zoning standards.
- Page 2-5, Section 2.4 Project Description: During the Initial Study/Notice of Preparation review process, we pointed out in our comment letter (5/1/08) that the Project Description in the Initial Study was inadequate to make an informed decision. In that letter we requested that the DEIR provide a more detailed description. The DEIR fails to provide an adequate description of this controversial project as required by Section 15124 (CEQA). This CEQA provision requires that the DEIR include a "detailed map" and a description "in a way that will be meaningful to the public". Moreover, the DEIR does not comply with Section 15146 of CEQA which states that "*an EIR on a construction project will necessarily be more detailed in the specific effects of the project than... a general plan... because the effects of the construction can be predicted with greater accuracy*". The following bullet points identify specific shortcomings of the Project Description described in the Executive Summary and Section 2.4:
 - The Conceptual Site Plan (Figure 2-4) does not call out or identify the location of key elements described in the narrative, such as wind turbines, swimming pool, vehicular access points, pedestrian access, amphitheater, the two structures adjacent to Buildings E and F, landscaping concept, lunch shelters, etc. (Note: We've reviewed other LAUSD environmental documents and found that most provide detailed site plans, elevations, and cross-sections. We point out that Point Fermin Outdoor Education Center CEQA documents include detailed site plans, floor plans, and elevations.)
 - The Conceptual Site Plan depicts several large polygons (shapes) but does not describe what they are. For example, there are several ovals of various sizes, cross-

hatching, and rectangles that are not labeled. It is not possible to interpret the exhibit without proper labeling.

- o Section 2-4 should have included conceptual elevation drawings and/or cross sections of the major structures.
- o Which structures would be up to 52 feet in height? How tall would other structures be and where would they be located? Does the maximum building height include rooftop mechanical equipment? If not, what is the projected overall maximum height? Will screening be used to hide rooftop mechanical equipment?
- o Will the outdoor amphitheater have lights? Will amplified concerts be held at the amphitheater? Will the amphitheater be available for use by the public? Will it be used at night?
- o The narrative states that the project "may" include a swimming pool. Where would the pool be located? Will the pool be indoor or outdoor? Will the pool be accessible to the general public? If so, how will the general public get access to the pool? Will it be used at night? Will there be lights? Will it be used for swim practice and/or competitions? If so, consider the impact of whistles, commonly used for practices and competitions and by lifeguards, on the noise element of CEQA. Will it be made available to PFOEC? And at what hours?
- o Will the "Existing Building", depicted on the eastern perimeter of the site plan, be retained? If so, what function will it serve?
- o The exhibit appears to show the access road along the northern perimeter terminating at the property boundary. However, we understand that the road will provide secondary vehicle access from Gaffey Street. Please clarify by providing an exhibit and/or narrative on the use of the road.
- o We understand that up to 36 wind turbines "may" be incorporated into the project. The Conceptual Site Plan does not identify the location of these 50-foot high

structures (or 60 feet high per page 3C-17), nor does the narrative provide any useful information about these structures. For example, it is critical that any decision-makers and the public have full understanding of operational characteristics, noise/vibration characteristics, colors, materials, silhouette/profile, maintenance requirements, lighting, etc. This is particularly true of the noise/vibration and the cumulative noise of 36 wind turbines, traffic, and other sounds associated with high school. The DEIR is unclear as to the decibels of one wind turbine and silent on the cumulative decibels for 36 turbines. Verification of the manufacturer's report was observed at PacWind's Torrance facility. However, the DEIR does not state what mechanisms were used to verify the manufacturer's data. References are to the American Wind Energy Association which is a trade association representing wind power project developers and equipment suppliers. The DEIR should provide an information sources that offers unbiased information regarding the decibel impact, not the proponent or vendor of the product.

- o The neighborhood is concerned about the safety of wind turbines in a residential neighborhood: please discuss this, particularly because this would be the first school to utilize wind turbines. Please include in the discussion about the safety of 36 wind turbines in close proximity to PFOEC and family residences. Further please include discussion of wind turbine safety when in exposed to daily 20+ mph winds for which this area is known. Please include in this discussion of the consequences of wind turbine malfunction.
- o The Conceptual Site Plan includes topographic contours, but does not identify elevations. It is important that the plan include elevations for proper evaluation.
- o What are "green roofs"? Please describe in detail and provide an example (photo or plan) of what these roofs will look like.

- Photovoltaic panels are proposed for the gymnasium. Please describe what they will look like and whether they will be seen from or reflect off-site.
 - The narrative states that the Continuation High School and the Early Education Center will be moved to the parking lot of the Oiled Bird Center and south of Building 948 and 950. Does either of these relocations require CEQA review or are they part of this project? If they are part of this project a full description of the project and impacts must be included in the DEIR.
 - The DEIR references that mass grading will be required, but no information is provided. Please provide the following: Conceptual grading plan, statistical data (including cut/fill quantities, cut/fill depths, amount of import or export, etc.), anticipated length of time it will take to complete mass grading, location of stockpile area, location of staging area, location and amount of remedial grading, erosion control measures, etc. particularly in relation to the findings documented in the PEA, SSI, and Remedial Action Workplans.
 - Will blasting be necessary to complete mass grading?
 - Describe the type of landscaping that will be implemented on land adjacent to existing residences along 30th Street, Alma Street, and 36th Street. (Please see 9/4/2008 minutes, page 84 where Mr. Alve indicated that the majority of the landscaping will stay as it is, which means no landscaping at all.) See Attachment 3.
 - We suggest additional parking spaces instead of the large recreational area, which considering this school is to be an annex, is unnecessary and contradictory.
- Page 2-6, first paragraph, second sentence: This refers to buildings being approximately 43 feet high. Pages ES-4 and ES-5 refer to the building height as 52 feet. Which is it?
 - Page 2-6, Access and Parking: No student parking on the school site? We find it hard to believe that on a site of 28 virtually flat acres there is no room for student parking. To impose student parking on surrounding streets, no matter how few are currently estimated, is not justified and is

not good planning. All projected parking should be incorporated on the site. We suggest that LAUSD planners consider adding student parking on the large flat area to the east of the proposed faculty/staff parking lot or perhaps in the large vacant area adjacent to the drop-off area. We estimate these areas could accommodate an additional 100+ parking spaces. We suggest additional parking spaces instead of buildings.

- Page 2-7, last paragraph: Please discuss the types of "barriers" that would be installed around construction sites and staging areas.
- Page 2-8, LAUSD Design Standards: We believe that language like CHPS and BMPs "*may be applied to this specific project*" indicates that the project has not been well thought out or ready to be evaluated.
 - Noise/Acoustics: Please include full discussion of "buffer" considered by this Proposed Project, particularly between the project and adjacent residential areas.
 - Noise/Acoustics: While we are very concerned about noise impacts to adjacent residences, we are also concerned that buffers (masonry walls) to mitigate noise would impose visual and view impacts.
 - Geological Hazards: Seismic hazards should be fully analyzed in this EIR.
- Page 2-12, Lead Agency Approval: The statement that the DEIR provides an "*environmental review for the whole of the Proposed Project*" does not reflect what has been presented in this DEIR. We believe the LAUSD Board will agree with our position that the EIR does not provide adequate or accurate information to allow for informed decision-making on this very controversial project. Moreover, since the DEIR does not meet CEQA requirements, we respectfully recommend that the LAUSD Board call for the document to be revised and recirculated pursuant to Section 15088 of CEQA.
- Page 2-13, Responsible Agencies: The California Coastal Commission is listed as a Responsible Agency for this project; however, there is no discussion as to their role. Please identify the

discretionary approvals that will be required from the Coastal Commission. Has LAUSD engaged in early consultation with the Coastal Commission? If so, summarize their comments/concerns.

- Page 2-16, Cumulative Scenario: The DEIR includes three projects to be evaluated in the DEIR; however, it does not include any description of the criteria used to select cumulative projects. The selection criteria should be transparent to insure that decision makers and the public can be assured that all cumulative impacts are adequately discussed. We believe that there must be more than three related and cumulative projects that should be evaluated. We've reviewed other recent EIRs published in the local area and found many projects that should be considered. For example, the Port of Los Angeles Channel Deepening Project and Marymount College Expansion (Rancho Palos Verdes) are just two EIRs that list dozens of related and cumulative projects. Please revise this section to include selection criteria and expand the list of projects, as necessary. Please discuss cumulative impacts in relation to the proposed Marymount College expansion, Long Point Resort Terranea Project in Rancho Palos Verdes and the proposed expansion of PFOEC and AGCC.
- Page 2-17, Areas of Controversy: We believe the summary of "potential areas of controversy" listed on page 2-17 is relatively accurate; however, we find that Table 2-2 does not adequately respond to those topics. Your attention is directed to the summary of the letter NOISE sent on 5/1/08 (see #E28 on page 2-37). Our letter articulated several controversial issues that were not addressed in the impacts analysis of the DEIR. These issues include geology (seismic, soil stability), aesthetics (views/visual impacts), hazardous materials/air quality (methane, MATES Studies), biology (nesting bird impacts, sensitive habitat and wildlife), hydrology (flood control, water quality), land use compatibility, traffic/parking (pedestrian safety, student parking, road/sidewalk improvements), and cumulative analyses. We also note that several comments requested that the MATES Studies and other related documents be addressed. Table 2-2 refers to the Air Quality analysis, but the narrative does not address these important studies at all.

Why?

- Page 3A-3, Section 3A.3.2 Visual Character: The aesthetic study area of 0.5 miles seems arbitrary. Describe the rationale for this criteria.
- Page 3A-3, Section 3A.3.2 Visual Character: This section states that the key viewpoints were chosen for representation of the "viewer group" locations, yet none of these locations represent the views of any nearby residents. This is particularly notable since page 3A-5 (Viewer Group) states that "neighbors compose a major viewer group with views of the site". This is a major oversight and should be corrected to allow informed decision making regarding view and visual impacts. The discussion should include the views of nearby residents of this proposed project; suggested views are depicted in photographs attached as attachment 3.
- Page 3A-3, Visual Character: A notable visual character of this area is the absence of ambient light in the evening and nighttime. This element significantly contributes to the desirability of this area. Discussion of the proposed project should include how the lack of evening lights will be significantly changed by the proposed project and its objectives of community use, adult school. Also, the cumulative impact of this project and PFOEC on the absence of ambient light should be discussed.
- Page 3A-4, Visual Character: Dense fog obscures views during early morning, early evening, evening and nighttime. (Reference is made to NOP/IS responses which attached photos of the dense fog; please incorporate these photos into this response.) ^{See Attachment II} This should be discussed in relation to traffic, pedestrian safety, adult evening school and community usage of tennis courts and swimming pools. This dense fog particularly affects Alma Street. A discussion of traffic and pedestrian safety should be discussed in light of the dense fog, particularly in relation to and south of Key Viewpoint 11.
- Figure 3A-2, Key Viewpoints: The DEIR suggests that key viewpoints were chosen for their representation of the visual environment and viewer group locations. The selection of the key viewpoints gives little consideration of views to the site. We find this a major omission. We suggest that the following viewpoints be added: a viewpoint for the homes located at the

bottom of the Alma Street entrance on Alma, a viewpoint for the homes on the east side of Almeria which look directly on to the Proposed Project site.

- Figure 3A-2, Key Viewpoints: The exhibit incorrectly labels an on-site road as Gaffey Street.
- Page 3A-5, Section 3A.3.3, Viewer Groups: Key Viewpoint 6 fails to adequately describe the visual impact the Proposed Project will have on the residents on Alma Street. To more appropriately describe the impact, a photograph should be taken from the front of their homes as they look up at the project, and then attempt to understand the enormous impact of several story buildings built close to the edge of the canyon. An attempt to illustrate what is there presently as to what is proposed is attached as Attachment 4. Further, the impact on residents on the east side of Almeria Street, from the intersection of 36th Street to 31st Street is totally disregarded. This should be discussed in detail as well: these residents will view the loading/receiving dock, trash enclosures, the back of the food service building and the gym.
- Page 3A-9, Section 3A.4.2, Collaborative for High Performance Schools Criteria: This should be discussed in specific detail, particularly since the lights currently on this site installed by LAUSD fail to minimize light spilling onto adjacent properties.
- Page 3A-10, Section 3A.5.1, Methodology: The document fails to include photos taken from KOP locations A, C, G, and I. Also, please include other KOPs considered, but not discussed in the DEIR.
- Page 3A-10, Section 3A.5.1, Methodology: The methodology fails to include the following "Key Observation Points": Along Alma street, directly below the entrance to the school. The east and west sides of Almeria; specifically addresses starting at 3144 and continuing up to 3439 Almeria Street. See Attachments 3 + 4. It is requested that these locations should have color photorealistic simulations utilizing digitized photographs to show how viewpoints would be impacted.
- Page 3A-10, Section 3A.5.1, Methodology: The DEIR fails to include the following locations when identifying panoramic/scenic views in the area: 3103 and 3111 Leland and 3408 to 3540 Patton

Street, both sides of the street. These locations all have ocean views which will be impacted by the proposed project. These locations were easily discovered when looking west from the proposed project to determine homes with higher elevations. The locations mentioned above were the easiest addresses to locate; it is reasonable to assume that there are other locations that have been not been addressed by this DEIR. Further investigation is required. Please correct.

- Page 3A-8, first paragraph: This paragraph (as well as others in the DEIR) includes a statement that the maximum building height is 43 feet, yet elsewhere in the document the maximum height is stated to be 52 feet. Please correct this error.
- Page 3A-10, Section 3A.5.1: In general we feel the "methodology" proposed to evaluate impacts is adequate; however, the implementation of this methodology lacks objectivity and is far from adequate. For example:
 - Key viewpoints disregard significant off-site views of adjacent and nearby residents. We request that key viewpoints be augmented with locations within the residential neighborhood. Alma Street, Almeria Street, 36th Street, and other upslope properties to the west such as Leland and Patton should be included. Also any streets running north and south located south of the school. Also, those properties on 30th Street close to Alma which have an ocean view.
 - Statements on page 3A-5 such as "views of most surrounding residents towards the project site are fairly obscured due to dense urban development in the area and tend to be limited to the foreground" and "middle ground or background views typically occur only along roadway corridors" are completely wrong and show a lack of understanding of the area and sensitivity to the viewer groups in the neighborhood.
 - Page 3A-6 (Roadway Users) states that "drivers" focus on roadway conditions, but does not acknowledge the view sensitivity of passengers traveling through the

surrounding neighborhoods. We contend that their view sensitivity would be moderate to high. Please acknowledge.

- o The statements on page 3A-7 (Views) acknowledge that some residences to the north and northwest have "panoramic and potentially scenic views". However, the view impact analysis sweeps these facts aside and provides no discussion. Moreover, we are not aware of one local resident that was asked to use their home as a "key viewpoint" or "key observation point".
- o The discussion of views from public scenic views on page 3A-8 indicates that site would only be visible from one location (Osgood-Farley Battery) and goes on to state that the project would be approximately 43 feet high in the central portion of the site. Our analysis of the project description indicates that the maximum height of the project is 52 feet. Moreover, the Conceptual Site Plan shows that all the structures sit on a flat pad (elevation range is 230' to 232' above seal level); therefore the reference to a 43-foot high building is irrelevant. The analysis should use the 52-foot high structure as the maximum building height.
- o The discussion of Shade and Shadow does not take into account potential planting of trees and large shrubs around the perimeter of the project that could cast shadows. Moreover, the DEIR does not address the potential impact of shade and shadow from the proposed wind turbines, which appear to be at the same general elevation as adjacent homes to the north and west.
- o The visual simulations are intended to include "critical" viewpoints. However, the introduction to this topic (page 3A-10) acknowledges that the key observation points are taken only from "public vantages". The DEIR omits any private residence as a "key viewpoint" or "key observation point". This is a serious omission that does not provide the public or decision makers adequate information.

- o Although eleven sites were identified as KOPs, only six were selected to depict "the most sensitive public views". It is interesting to note that of the five not selected, four are from off-site vantages that would help the public and decision makers understand the true impact of the proposed project to neighborhood views and visual character. This analysis completely disregards views from any adjacent homes.
- o Figure 3A-5b depicts the view from over 1/3 mile away from the nearest proposed structures. The structures (particularly wind turbines) are clearly visible. Although the horizon is not very clear in the photograph, it appears that the project could obstruct the horizon from KOP-D or adjacent homes that are not included in the analysis. The horizon should be delineated on all photo simulations.
- o The photo simulation from KOP-F (Figure 3A-5d) depicts a significant and disruptive visual change from the existing condition. The proposed structure appears as a monolithic institutional structure, which is clearly out of character with the surrounding single family residential neighborhood. Based on the lack of information in the Project Description, it is impossible to know the true impact since we don't know the height of the large structure adjacent to Alma Street. This simulation also shows that the historic rock wall will remain, as will the barbed wire fence. The barbed wire fencing, coupled with the institutional architecture, give the appearance of a penitentiary. Several palm trees are shown in the center of the photograph of the existing condition. These same trees are depicted behind a structure in the future condition, yet we know they are located in front of the proposed structures, near the vehicle turnaround. Finally, the pedestrian walkway shown on the Conceptual Site Plan is not depicted on the simulation. We request that the simulation be revised to correct these issues and add something (car, people, dimension, etc.) to the image that will allow the public to get a sense of scale.

- The Coastal Specific Plan, Section 2, Purpose 8 states that development should be "...visually compatible with the character of the surrounding areas..."
 - There is no description or analysis of invasion of privacy for homes along Alma Street.
- Describe what is meant by wind turbines with "protective screens" on page 3A-11.
- Page 3A-11, Project Impacts: The impact analysis described in 3A-1 is seriously flawed:
 - The analysis is based on a single viewpoint (#10) from within the site. The proper analysis would have been from key residences that currently have scenic views of and over the site. We would be happy to help LAUSD select the appropriate locations.
 - The argument that spaces between structures would retain views is absurd since the proposed structures are so close together, that any view would be a matter of a few feet and probably obstructed by buildings or structures in the background.
 - We concur that the project would "detract from or restrict scenic views"; however we would add that these impacts would be substantial.
 - We are confused by the statement on page 3A-12 (first paragraph) that the Coastal Zone Specific Plan requires that "new development is to be limited to 24 feet in height" within specific view corridors. The proposed structures will range from 43 to 52 feet high. Please describe this discrepancy with the Coastal Zone Specific Plan.
- Page 3A-12, second paragraph (Project Impacts): This analysis is flawed for several reasons. KOPs A, C, G, and I are not included in the analysis. Further, views from private houses at the Alma Street entrance, east side of Almeria Street, and 30th Street should have been included for a discussion of impact. Please include KOPs A, C, G and I with the simulation of the property development. Further, KOP E, located at the top of the east side of Almeria, clearly is taken from the west side of the street. It would be more instructive if the photo was taken, then simulated, from the home involved to see exactly how their view is impacted. Further, the characterization of the Proposed Project as a "middleground feature...not tend to detract from

or restrict views, but rather blend into the ridge" is totally inaccurate; KOP D will look at 36 wind turbines, parked cars, and multi-story buildings (resembling an industrial park) when they now look upon open fields with random small, unassuming but historic buildings.

- Page 3A-12, Mitigation Measures: We strongly disagree with the statement that "the only manner ... to mitigate... is the removal of the wind turbines". We recommend that another mitigation measure would be to lower the height of the proposed structures to be compatible with the surrounding neighborhood. We also propose putting the buildings on the east side of the land. See attachment 5.
- Page 3A-13: Contrary to the statement that schools are generally aesthetically compatible with residential, this proposed school is completely out of character with the low-density residential community it is designed to serve. The characterization that the school structures would be one and two-story (43 feet) is misleading, since the Project Description states that there would be "two or three story buildings" with a maximum height of 52 feet.
- Page 3A-14, Best Management Practices, first paragraph: We request more details as to how the new light sources will be reduced at the residential property line, particularly in light of the failure to include in the KOPs the residences at the Alma Street entrance, the east side of Almeria, 30th street, and 36th Street. We would request further detailed discussion of the District use of hoods, filtering louvers, glare shields, and/or landscaping. The site plan makes no reference to landscaping for the Alma boundary or the 36th Street boundary. (Please see 9/4/2008 minutes, page 84 wherein Mr. Alve indicated that the landscaping on Alma will stay as it is, which means there will be no landscaping.)
- Page 3A-14, Best Management Practices, second paragraph: The document indicates that "appropriate design changes to reduce or eliminate" aesthetic impact can be made. Please address the range of possible changes. Please refer to the alternative suggested in Attachment 5.

- Page 3A-14, Best Management Practices, third paragraph: "A preliminary landscape plan **will be** designed...planting design **will be** created...buildings and wind turbines **will be** designed...proposed development **will be** designed...building materials, detailing, and colors **will be** selected". This fails to inform the public as required by CEQA. We request that all of these details are discussed. Because these details were not discussed in the current DEIR, we request that the DEIR be reed and recirculated. If the project description is incomplete, inaccurate, confusing, truncated, or misleading, the usefulness of the DEIR as an informational and interactive document will be impaired. In *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 729-734, the Court stated: "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measure, assess the advantage of terminating the proposal...and weigh other alternatives in the balance." It must be complete, accurate and contain sufficient detail for the public to understand the environmental impacts.
- Page 3A-14: Clearly the project will have a significant adverse aesthetic impact, therefore we respectfully request that the project be abandoned or implement significant changes to eliminate serious impacts to the community.
- Page 3A-14, seventh paragraph: "(w)ind turbines will designed and constructed **to be compatible** with local character": there are no wind turbines in San Pedro. The wind turbines will overwhelm the neighborhood. Please detail how 36 wind turbines could be designed and constructed to be compatible with this residential neighborhood.
- Page 3A-15, Mitigation Measures: There is no meaningful discussion of attempts to mitigate the visual impact. However, the following suggestions should be discussed: detailed landscaping along all borders of the property (however, it is recognized that landscaping may block views, cast shadows, or in some other way detrimentally affect viewpoints), lowered building heights, no wind turbines, downscale the height and vastness of the administration building, do not build

an amphitheatre, switch the kitchen and gym to the other side of the campus, do not build a pool.

- Page 3A-15, Cumulative Impacts: The DEIR failed to include the cumulative impact of this project in combination with the expansion of PFOEC and AGCC, which are well within a 1.5 mile radius.
- Page 3A-15, Measures: Reduce the height of the buildings. Lower the ground level through excavation, thereby lowering the height of the buildings. For those residences with views that are drastically changed by the Proposed Project, such as Alma Street and the east side of Almeria Street, it is proposed that these residences be compensated with landscaping on their property to block the view of this property; particularly those properties whose view will be the back of the school's kitchen, gymnasium and the trash dump. Further, it is suggested that the District landscape the Alma corridor to relieve the imposition of school buildings on the residents looking at the property.
- Section 3B - Air Quality: Air quality analyses are, by their technical nature, very complicated and difficult to fully understand by the general public. The results of these analyses are based on a series of assumptions and a model. While we don't have the technical background to challenge the model, we seriously question the background assumptions that were used to run the model. For example, the DEIR does not include any grading information. This is acknowledged as the major cause of construction related air quality impacts. The DEIR should include a discussion of the construction phase, including the area to be disturbed by grading, the location of grading (conceptual grading plan), total amount of grading (volume in cubic yards), amount of grading per day, duration of grading operation, the type and quantity of equipment to be used, etc. This information should be described in the body of the DEIR, not buried in the technical study of the appendix. Other concerns with respect to the Air Quality analysis include:

- o During the Notice of Preparation and Initial Study review period *NOISE* and others pointed out that the Air Quality analysis had not addressed the findings of the MATES II and III Studies (Multiple Air Toxic Exposure Study). These studies and other important and relevant reports were again overlooked in the DEIR. We note that Table 2-2 (Scoping Period Comment Summary) recognized various comments suggesting that these studies should be addressed in the DEIR. The table (B4, E33, indicated these would be addressed in the Air Quality section of the DEIR. Not one word about these studies was mentioned. This is another example of the EIR Consultant ignoring important public comments.
- o Pages 3B-24 and 25 discuss GHG emissions. If the project is implemented with wind turbines and photovoltaic panels, wouldn't the amount of GHG emission be reduced? Where is this addressed in the DEIR?
- o However our concern is in regard to the impacts of existing severely deleterious air quality conditions at the proposed site upon the students and faculty that will spend large amounts of time there. We assert that the proposed site for this school is in a location that poses an unacceptable health risk to its students and faculty due to extremely poor local air quality. Please discuss.
- o We wish to include as a part of the public record on this matter the entire text of the MATES III Draft Final Report, July 2008 prepared by the SCAQMD as well as the entire text of the MATES II Study that preceded it.
- o We request that a document known as Air Quality Issues in School Site Selection Guidance Document, June 2005 prepared by the SCAQMD be included in its entirety in the public record on this matter.
- o We request that a document titled "Health Effects of Diesel Exhaust Air Pollution" and the medical literature referenced therein, prepared by the Port

of Los Angeles Community Advisory Committees Air Quality Subcommittee, be included in the public record on this matter. See Attachment 6.

- AQMD's advised the following: "Because children spend so much of their time at the school site, and they are often more sensitive than adults to the health effects of air pollution, it is important to avoid locations with poor air quality". Further, although many regulatory programs are in place, local emissions may still cause "hot spots" of air pollution that can adversely affect the health of students if schools are placed near these sources. Among a list of emission sources of concern, AQMD lists 'ports'. Please discuss.
- The MATES III Study demonstrates that the Proposed Project is in an area that suffers from extremely elevated levels of air pollution due to the nearby Ports of Los Angeles (POLA) and Long Beach. As shown in MATES III Figure ES-4 and Figure 4-10, this site is in an area that is estimated to be among the highest average risk (per million) in the South Coast Air Basin (1200-1400 vs. average risk of 816 in the Basin excluding the Ports Area). Further, although in the majority of the South Coast Air Basin the risk had decreased since MATES II, the *risk in the Ports Area including the proposed school site had increased by 15 % as shown in Table 4-4 and in Figure ES – 5!* Please discuss.
- Based on the pollution levels, locating a school at the proposed site is the functional equivalent of locating a school immediately adjacent (within 500 feet) of a large busy freeway, which is contrary to the intent of SB 352. This is due to the Port, which is less than two miles away. Of particular concern is pollution from shipping lanes which is unlike automobile/truck pollution which is released near the ground. Ships burn extremely high polluting, low quality fuel, and inject their pollutants much higher from the surface of the earth. This forms a buoyant plume of heated toxic exhaust released from the high stacks of the ships. This plume may carry much farther than the plume of emissions from automobiles and trucks on freeways. Experts have testified before the

Air Quality Subcommittee of the Port of Los Angeles Community Advisory Committee that the "stack effect" of the ships means that the distance to falloff to baseline levels from ship emissions is much greater than the falloff distance from roadway emissions. This toxic plume would blow upwind to the proposed project. This is the reason for the seemingly paradoxical findings in MATES II and MATES III of "high risk areas" out over the open ocean near the entrance to the Port. Please discuss.

- The *California Department of Education Site Selection and Approval Guide* recommends distances of two nautical miles between schools and airport runways. MATES II and III do show a toxic hot spot around the Los Angeles Airport, but it is considerably smaller and less severe than the toxic zone in the communities surrounding the Ports of Los Angeles and Long Beach. A reasonable person might conclude that if the Department of Education recommends a two nautical mile safety zone between a school and Los Angeles Airport, an even larger safety zone distance from the Port of Los Angeles (a much more severe toxic source) should be implemented in any new school construction. Please discuss.
- Page 3B-5, Section 3B.2.4 Existing Local Air Quality: The use of data for the analysis from the Westchester Parkway Air Monitoring Station in the City of Los Angeles is a major mistake that must be corrected by revision and recirculation of the DEIR. The Westchester Parkway air monitoring Station is located many miles away from the proposed project site. Data from the Westchester Station is not representative of conditions at the site. The relevant air toxic sampling sites are located at Port of Los Angeles and Port of Long Beach, installed by AQMD and California Air Resources Board (CARB). There is data available from fourteen sampling sites. In February, 2005, monitoring began for POLA in response to growing community concerns about the serious adverse health impacts known to exist in these communities, widely referred to

as the "Diesel Death Zone", surrounding the Ports. Please discuss this more relevant data.

- Please discuss data from the sampling sites of the Port of Los Angeles network known as "San Pedro Community Site", "Coastal Boundary Site" (both less than two miles from the project site) and the "Source Dominated Site" (less than three miles from the proposed project site). Please include in your analysis SO₂, PM₁₀, PM_{2.5}, and ultra fine particles (less than 0.1 micron).
- We request that Section 3.2 "Air Quality and Meteorology" from the July 2008 DSEIS/SEIR for the POLA Channel Deepening Project be made a part of the public record on the DEIR for SRHS #15.
- In Table 3B-1 of the SRHS #15 DEIR, there were omissions and errors: the California 8 hour standard for ozone of 0.7 ppm was omitted? If this had been included, there would have been days that the standard was exceeded in both 2005 and 2007. The position taken that there were no days when the standard was exceeded would be mistaken. Please correct and discuss.
- The NAAQS 8 Hour standard for ozone is incorrectly described as 0.07ppm. It is 0.08 ppm. The CAAQS 1 hour Standard is incorrectly described as 0.08 ppm. It is 0.09 ppm. Please correct and discuss.
- In Table 3B-1, the NAAQS 24 hour Standard for PM_{2.5} is incorrectly stated at greater than 65mcg per cubic meter. It should be 35 mcg per cubic meter. If the correct standard had been used in 3B-1, there would have been many days in 2005, 2006 and 2007 that exceeded the NAAQS 24 hour standard, instead of the zero days asserted in this table. Please correct and discuss.
- The California Annual Standards and National Annual Standards for PM 2.5 of 12 and 15 mcg per cubic meter respectively are not mentioned and discussed. The California PM₁₀ Annual Standard of 20 mcg per cubic meter is omitted. Our source for the above

mentioned standards is table 3.2-2 "California and National Ambient Air Quality Standards" from the POLA Channel Deepening Project DSEIS/SEIR , which we believe is correct. Please include, correct and discuss.

- The labeling of numeric values associated with PM 10 and PM 2.5 is confusing. For example: the phrase "National maximum 24 hour concentration" is followed by numeric values 44, 45, and 128 for the years 2005, 2006 and 2007. The same descriptive terminology occurs eight more times in this section. Please define the meaning. Please discuss its meaning in relation to *measured concentrations* at the site? Please correct.
- PM 2.5 relies on data from the South Long Beach Station. Please include data from the North Long Beach Station, as referenced in the July 2008 Channel deepening Project DSEIS /SEIR, mentioned above: " Table 3.2-3 shows that the following standards were exceeded at the North Long Beach Station over the four year period: (1) ozone (state 1 hour standards), (2) PM 10 (state 24-hour and annual standards), and (3) PM2.5 (national 24-hour standard and national and state annual standards)". Please include and discuss.
- The above suggests a lack of attention to available Air Quality documentation and studies. We request that the LAUSD work with the SCAQMD, CARB and US EPA to revise and recirculate the DEIR that truly reflects the reality of existing and projected future toxic air pollution, especially DPM, at the proposed project site.
- In a letter dated Sept. 18, 2008 to Dr. Appy of the Environmental Management Division at POLA, Director of the Los Angeles County Dept. of Public Health, Jonathon Fielding M.D. calls for a port wide Health Impact Assessment (HIA). The letter states:

"Given the vast magnitude of operations at the two ports and the great potential for these operations to adversely impact the health of neighboring communities and the regional population, the Los Angeles Co. Dept. of Public Health strongly supports efforts to evaluate and prevent or mitigate these health impacts to the greatest degree possible. We believe that the current environmental impact statements provide a relatively narrow and incomplete perspective on potential health impacts of proposed port expansion projects. HIA presents an important complimentary tool for more comprehensively assessing the broad range of health

effects of proposed policies and projects, including not only the impacts arising from the physical environment but also consideration of the influences of the social and economic environments on health."

Please discuss.

- In a letter dated August 20, 2008 to the US Army Corp. of Engineers, the United States Environmental Protection Agency (EPA), Region IX, also called for the development of a Health Impact Assessment for the Port wide area. (Included in the public record by reference). Please note that an HIA is not the same as an HRA (Health Risk Assessment). We ask that the completion of this DEIR be delayed until the involved agencies can complete the needed HIA.
- The Air Quality section of the DEIR seems silent about the effects of proposed future Port expansion plans on existing local poor air quality. We request that the revised and re-circulated DEIR take into account all of the proposed and planned expansion projects. Although we note that the Ports have made substantial efforts to reduce Port related air emissions, to date these efforts have merely resulted in a slowing of the overall growth of these emissions. Unfortunately, the sequential air emission inventories for POLA demonstrate increasing total emissions from the port due to growth in cargo volume. In other words, volume growth has overwhelmed all of the positive effects of all efforts at diminishing the total pollution burden to date. Please thoroughly discuss the cumulative effects of proposed future Port expansion plans on existing local poor air quality both in terms of the student/faculty health and the impacted neighborhood.
- Page 3B-21 and 22: Please detail how the following statement will be enforced: "The ACTM measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time. As such potential impacts to localized air impacts from onsite sources of diesel particulate emissions would be minima since only a limited number of school buses would access the Proposed Project site...".

- Page 3B-21 and 22: The term "limited number of school buses" is vague. Please define.
- Page 3C-1, Section 3C.2 Environmental Setting: The description fails to discuss the PFOEC's plan to plant coastal sage scrub (CSS), which will attract the Palos Verdes blue butterfly, South Coast saltscare and Davidson's saltscare. The description fails to account for other extensive planting by PFOEC, such as chaparral, grasslands and tall trees. Please include and discuss the impact of the proposed project on PFOEC's intended goals and the intent of grants received from the Wildlands Conservancy to fund the expansion of PFOEC. (Source: News Release from LAUSD Office of Communications 12/14/2006) Please discuss the proposed project's impact on BTB's mission at PFOEC to utilize the natural environment to convey lessons...to help students understand the interrelationships of living and the physical components of the environment." (See PFOEC Final EIR.) Please discuss the impact of the Proposed Project on the intent of the \$2.5 million grant from the Wildlands Conservancy to enhance green space at PFOEC.
- Page 3C-17, second full paragraph: This description of the wind turbines refers to them being "up to 60 feet tall". This needs to be clarified in the DEIR.
- Page 3C-19, second paragraph: CEC guidelines recommend a one-year pre-permitting survey. This should be accomplished before construction or DTSC compliance begins. The results of the one-year pre-permitting survey should be discussed in this DEIR. Further, the District focuses only on tree removal in the discussion regarding ensuring reproductive success. However, the construction process on a scale such as the Proposed Project is likely to disrupt reproductive processes. Please discuss. Further, details should be included regarding the wind turbine portion of the proposed project, rather than the reference "will be developed".
- Page 3D-7, Cultural Resources: The stone wall on the project perimeter is identified as a significant historical archaeological resource. Will the wall and two entry columns be preserved as part of the project? Will the barbed wire and chain link fence on top of the block wall be retained?

- Section 3E, Hazards/Hazardous Materials: We find it interesting that the discussion of hazardous materials on this former military base was summarized in eight pages of the DEIR. This topic, which includes areas used for hand grenades, tear gas, and machine gun training, is one of the most controversial issues associated with use of the property as a public school.
 - During the IS/NOP review process we pointed out that the City of Los Angeles had placed the area within a "Methane Buffer Zone" and requested that this topic be fully discussed in the DEIR. No discussion regarding methane has been included in the DEIR. We consider this a major oversight, which shows a continuing attitude to ignore serious comments from the public.
 - We also noted that the site contains several landfills, trash dumps, incineration area, cesspool, and other facilities that could adversely affect groundwater. The DEIR should discuss potential groundwater contamination.
 - Please discuss the potential impact if an unexploded hand grenade detonated during mass grading or construction.
 - A statement on page 3E-6 states that Mitigation Measure 3E.1 would reduce hazardous material impacts to a less-than significant level. Please point out where this mitigation measure is found.
 - There was neither a discussion of the findings in the PEA nor a discussion of how this site will be cleaned of the toxins. We incorporate our comment letter to the DTSC as **ATTACHMENT 8 appendix**. We further indicate that our repeated attempts to get information about the DTSC process, further site testing, and removal action workplan have gone unanswered. **See appendix**
- Pages 3F-6 and 7, Coastal Specific Plan:
 - Appendix C (Special Features) of the Coastal Specific Plan does not identify the project area in a "visual corridor". Please acknowledge this error.

- Appendix C designates the project area as a "Recreational Area", not public facility or school.
- The Specific Plan does not recognize Public Facilities as a land use within the boundaries of the Specific Plan Area, nor does it address whether zoning supersedes the Specific Plan. Please address this issue.
- The Coastal Specific Plan Land Use Regulations (Section 5) include the following:
 - A geology report must be approved prior to issuance of any permits.
 - No structure shall exceed two stories or 26' in an area designated for residential use.
- Page 3F-9, Consistency Table: The "Discussion" portion of the Consistency Table for the Coastal Specific Plan states "The San Pedro Coastal Program Specific Plan has designated that school sites, along with recreation areas and other public uses are allowed within this area. Because the Proposed Project is a high school for public use, it is consistent with this policy". This is incorrect; there is no such statement in the Specific Plan. Please correct this error.
- Page 3F-10, Cumulative Impacts: Please refer to our earlier comment regarding cumulative impacts (page 2-16).
- Page 3G-1, Section 3G, Noise: We reiterate our concerns as to fluctuating student population numbers (1215 to 810 to 500, see discussion above in ES-1) and the impact on noise in the neighborhood of 1215 projected students. It has been also continuously stated in public meetings that the proposed project will be an annex to San Pedro High School and students will be "shuttled" back and forth between the two schools. (See 9/4/2008 minutes, page 9: Dr. Vladovic: "We only wanted an annex, so it is still part of San Pedro High School. There's not going to be two schools." Page 40: Linda Del Cueto: "we have been referring to it as 'the annex' because it is part of San Pedro High School." There is no information regarding the proposed project as an annex or details regarding shuttling in the DEIR. Please include and

discuss these details and their impact on noise, in particular, the anticipated routes, times, frequency and vehicular load of the shuttling.

- Page 3G-4: Table 3G-2 indicates that the measurement date was January 29th. Footnote 224 indicates noise monitoring was January 28, 2008. Please correct.
- Page 3G-16: The Proposed Project accommodates 415 students for adult night classes. The traffic study suggests that 205 vehicle trips would occur. Please explain this suggestion when it seems more reasonable to assume that each adult student would drive their own car back and forth to school for a total of over 900 vehicle trips.
- Page 3G-20, Operational Onsite Activity Noise: There is no reference to, or analysis of, the amphitheater noise impacts. Please describe range of potential activities (assemblies, concerts, etc.) and noise levels generated with and without amplification.
- Page 3G-21, paragraph 1: Describes the closest sensitive receptor at the Proposed Project is approximately 450 feet from the courts, fields and the swimming pools. This is inaccurate. Residences on 36th St. are approximately 100 feet from the field. Residences on Almeria Street are approximately 250 feet from the field.
- Page 3G-22, Bleacher Noise: Bleachers are not referenced in figure 2-4, the Conceptual Site Plan. Please explain how it was determined that a crowd cheers only 25 percent of the time. Please explain if there will be use of loudspeakers and announcers to add to the cheers of the crowd.
- Page 3G-23, Measure 3G.1: Since the DEIR does not define the location of grading and other construction related activities, the conclusion that noise blankets would reduce construction noise to a less-than-significant level is not justifiable. In *Kings County Farm Bureau v. City of Hanford (1999)* 221 Cal.App.3d 692, 728, the Court propounded the general rule that lead and responsible agencies should not be allowed to rely on mitigation measures that will be formulated after project approval. Further consideration should be given to a 12 foot berm or

soundproof wall to mitigate construction and on-site activity noise. Further, we would disagree with the description of 33 months of construction noise as short-term.

- Page 3G-24, Construction Noise: As with the previous comment, it is not possible to conclude that short-term construction noise would be less than significant, without knowing limits of grading, equipment staging areas, stockpile areas, hours of operation, etc. Further, some homes on Almeria, across the street from the proposed project site, due to the steep nature of the canyon, are little more than 30 feet away; the construction noise will exceed the city's standard of 75 dBA.
- Pages 3G-27 and 28, Ground-borne Vibration: This discussion does not address potential construction related vibration sources, such as ripping operations, grading equipment (dozers, scrapers), blasting, etc. In addition, there is no discussion regarding potential vibration from up to 36 wind turbines. These topics need to be fully analyzed.
- Page 3G-21, Page 3G-25, Operational Onsite Activity Noise:
 - This discussion does not address loud car stereos, a pervasive staple of the high school population. This should be included not only in a measurement of noise but also vibration. (When the stereo systems are turned full volume, everything around them vibrates.)
 - Swimming pools necessitate life guards and other adults with whistles. This is not included in the discussion.
 - Further, the "canyon effect", experienced by residents nearby the Alma corridor, commented upon by many residents at all public hearings and in the NOP/IS responses, was not at all discussed. See NOP/IS comments from NOISE, PRA, and numerous other residents and individuals. Please reference the public meetings at Dana Middle School and Barton Hill.
 - Further, there is no discussion of early morning delivery trucks and the impact this will have on the nearby residents at 6-7 a.m.

- Page 3G-22, Page 3G-27, Page 3G-30: Mitigation Measures: Please consider and discuss the following mitigating measures: Do not build the pool, amphitheatre, athletic fields, wind turbines, and bleachers. Allow only faculty cars to enter at Alma and Main Street to mitigate traffic, noise, and danger to pedestrians along the Alma corridor. Downsize the entire project. Provide affected residents with upgraded soundproof windows and landscaping to mitigate noise and aesthetics.
- Page 3G-23 Impact 3G-2: We disagree with the analysis of the impact on noise from traffic contained in the Proposed Project. We proffer the following analysis: LAUSD projects that there will be approximately 1926 trips per day to this proposed high school. While most of the traffic will be from either Gaffey St. or 25th St. to either the east or west entrances to the proposed high school, it is not unreasonable to suppose that perhaps one third of this volume may be traveling Alma St between 30th and 37th streets. The following data is relevant to the calculation of the noise impact from traffic created by this proposed project:
 - The posted speed limit on Alma in that area is 25 MPH.
 - The distance between 30th and 37th streets is approximately one half mile.
 - The time to traverse this one half mile is about 1.2 minutes.
 - Given that a vehicle driven at 25 mph will generate between 70 and 73 dBA.
 - Given that a vehicle may be considered a linear noise source with a noise attenuation of only half of that of a point source of noise.
 - Given that the distance from the centerline of Alma to one resident's property is only 18 feet.
 - Given that the LAUSD DEIR indicates that the ambient noise level to this resident's lot where it meets the western curb of Alms St. is (LT -3) is 55 dBA.

If one third of the 1926 vehicles per day travel on this route, that would be a total of 642 trips. If we were to assume that one car begins the trip when the prior one has just completed its travel, then the total time of exposure to this traffic noise would be 642 times 1.2 minutes for a total of 770 minutes per day. This is equivalent to 12.8 hours per day. Clearly, the vehicles will not be this orderly but will be traveling more closely together. This action would cause the noise level to increase as it goes up as a result of traffic density. The analysis will presume orderly traffic. Using the construction noise estimates and implied attenuation values in this DEIR (see construction equipment table) it appears that the noise of a vehicle should drop approximately 7 dBA in 50 feet.

However that attenuation is for a point source of noise, not for a moving source. Consequently the noise from the vehicle would drop only half of that in 50 feet. This results in an expected average noise level of 68 dBA at a distance of 50 feet.

Since the centerline of Alma is only 18 feet from some residents' property, those residents will expect to hear that 68 dBA every time a car passes their property. Actually it would be closer to 70 dBA since the distance is less than 50 feet.

Consequently for 12.8 hours a day, those residents would be able to hear an increase in sound of about 15 dBA (70 less the ambient 55). The computed average noise increase for 24 hours would be $12.8 / 24$ times 15 dBA for a total of 8 dBA as an average increase over a 24-hour period. Please discuss.

- Page 3G.4.3, Cumulative Impacts: Fails to analyze the cumulative effect of this project and the expansion of PFOEC which will provide housing for students, plus counselors year round, increasing yearly attendance from 8,000 to 13,000 students, with the proposed entrance at Alma

and Main Street. See DEIR, pages 2-4 to 2-5. A detailed discussion should include not only the on-site activities and increased traffic caused by the high school, but the anticipated trips involved in transporting students to PFOEC Mondays and Fridays and the noise generated by their activities. It also fails to analyze the impact of the on-site activities upon those participating in the PFOEC experience. The DEIR should discuss the cumulative impact in relation to the expansion of AGCC.

- Page 3H-1, Section 3H.2.1, Surrounding Street and Roads: a proposed pedestrian entrance is Gaffey and 32nd Street, which eventually becomes Barlow-Saxton Road on the property. There is no sidewalk on Barlow-Saxton Road. It is a steep hill on a narrow and curvy road. Please reference Google Earth to show narrowness of road (20 feet in some places), curvy nature, fast elevation change (20 meters), obstructed views, and no sidewalk. This would be dangerous to any pedestrians and, for these reasons, would not be used at all. Please discuss and detail any plans to locate a sidewalk on this. Please discuss and detail pedestrian/traffic plans.
- Figures 3H-1, 3H-2, 3H-3 and 3J-4: Hamilton Street connects to the Gaffey/25th Street intersection. Please correct.
- Figure 3H-2: We reiterate our concerns that the proposed project will ultimately house 1215 students as originally proposed (see discussion above in ES-1). This will significantly impact pedestrian traffic. Please redraft and recirculate the DEIR as it pertains to the real projected student figure of 1215 students.
- Figure 3H-2: Pedestrian traffic entering onto Alma from 37th indicates 12 students. The total number of students entering the Alma Street entrance from the south is seven. Please explain.
- Figure 3H-3: We question the projection of 126 or 131 students arriving at the proposed project as pedestrians. Please provide the methodology and studies used to arrive at this projection. We question this projection for the following reasons: 1.) the surrounding area is hilly and narrow. Traveling south on Alma from Main Street is downhill. This area is notorious for drivers who pick up speed as the curves are negotiated, making it unsafe for pedestrians and/or

bicyclists. This is born out by the 17 accidents involving of out-of-control vehicles crashing into the homes and structures at the Alma and 37th Street intersection. 2.) The immediate area has few high school age children or children who will be high school age by the completion of the proposed project. Please provide data to show from what location the projected student population will be originating. Please explain how this data supports the assumption that there will be an estimated 126/131 student pedestrian volume.

- Figure 3H-1: The proposed project sits in a neighborhood that is composed of steep hills and winding roads, frequently subject to dense fogs blocking all visibility, which directly contradicts Caltrans' Safe Routes to School (SR2). Please explain.
- Page 3H-2 and Figure 3H-3, Study Intersections: The third bullet on page 3H-2 and Figure 3H-3 incorrectly identifies the intersection of Alma and Main (one of the proposed entrances to the school) as a "stop-controlled" intersection. Please correct this careless error. We point out that there is a stop sign just up the street at the intersection of Alma Street and 30th Street.
- Page 3H-5, Pedestrian Volume: Based on the information on Figure 3H-2, 126 students will walk to school. Why does the narrative on Page 3H-5 state that the number of pedestrians is 131?
- Page 3H-8, third paragraph: The Conceptual Site Plan does not depict a bus drop-off area as described in this paragraph. Without knowing the location of the bus drop-off area it is not possible to determine whether the plan complies with the stated guidelines. Please revise the site plan.
- Page 3H-8, fourth paragraph: There was no explanation or rationale given to the statement that "right-turn-only" controls would not be required. Please discuss this topic. Also discuss whether the primary access point at Alma Street and Main Street will be controlled by a stop sign or signal. Will the City of Los Angeles DOT permit a new stop sign at the Main Street access, since there is an existing stop sign, about 200 feet to the north, at Alma Street and 30th Street? We understand that most jurisdictions have standards for minimum distance between stop signs.

- Page 3H-8, fifth paragraph: How will delivery vehicle access be enforced? We are confused about the statement that the access would be on the south end of the site. The Gaffey Street entrance is nearly due east of the site.
- Page 3H-9, Mitigation Measure 3H.1: LADOT should have been contacted during the planning process to prepare a pedestrian route map. Also, consider allowing the Alma entrance only for pedestrians and not cars.
- Page 3H-9, Mitigation Measure 3H.2: Other substandard sidewalks (Table 3H-2) should be improved to the full standard to insure pedestrian safety.
- Page 3H-10, Residual Impacts: It is unacceptable to have sidewalks that would result in a "significant and unavoidable impact to pedestrian safety". The DEIR also fails to consider pedestrian safety along the Alma corridor in regard to the dense fog (referenced earlier in the DEIR) that is frequently present during early morning and early evening hours.
- Page 3H-11, Cumulative Impacts: This does not discuss the cumulative effects of the expansion of the PFOEC in terms of traffic and pedestrian safety, particularly since the road from the Gaffey Street entrance to the drop-off site follows the PFOEC boundaries.
- Page 3I-1, Section 31 Public Services: There is no discussion of Emergency Catastrophe plans or Evacuation Plans. This is particularly important because of the proximity of this school to the port, a prime terrorist target, earthquakes, and the very nature of the proposed project's location: the southernmost tip of San Pedro, with no southern outlet because it is bounded by the ocean.
- Page 3I-4, Table 3I-1 Fire Flows: This table does not identify the fire flow standards for schools. What is the standard for schools and will it be met?
- Section 3J: Traffic and Transportation: We reiterate our concerns that the "real" student population will be 1215 students. (See discussion under ES-1). Please discuss. Please redraft and recirculate the DEIR in light of the anticipated "real" student population of 1215.
- Section 3J: Traffic and Transportation: Is it anticipated that either of the gates off of 36th Street will be open to pedestrians? If so, this will become a "drop-off" point that has not been studied

for safety. Please discuss the safety of the 36th Street and Emily intersection which involves a deadly curve and a drive over a cliff if the turn is missed. Please include the findings of the surveyors that have been out to this location on behalf of LAUSD.

- Page 3J-1, Section 3J.2.2 Local Roadway Network: Absent from the Transportation/Traffic discussion is the use of Alma by local residents to get to 25th to leave or enter the Palisades area. It is the most direct route. We believe that the impact on traffic has not been fully realized in this study. It has been observed that between the hours of 7:10 a.m. and 8:20 p.m. at Alma Street, between 34th and 36th, there was a total of 70 vehicles traveling northbound and 70 vehicles traveling southbound. The peak was between 7:40 to 7:50 when there were 40 cars. To increase the volume of cars on this narrow roadway is not "Less Than Significant" and should be upgraded to "Potentially Significant Impact."
- Page 3J-1, Section 3J.2.2 Local Roadway Network: Absent from the Transportation/Traffic discussion is the fact known by all nearby residents that the steep slope going southbound on Alma entices drivers to pick up speed, despite the curvature, then lose control at the intersection of Alma and 37th Street. The resident is currently rebuilding his home at this intersection, reports on the latest accident which sent a car plummeting through his brick wall to land in his backyard. This car pushed another car into his backyard. He is currently rebuilding this wall to reinforce it with steel. This reinforcement is wise since this location has been the site of 17 such incidents. See Attachment 10.
- Page 3J-1, Section 3J.2.1 Regional Highway Network: Describes State Route 47 as south of the site. It is north of the site. Please correct.
- Page 3J-1, Section 3J.2.2 Local Roadway Network: The first bullet in this section states that a stop sign is located at Alma Street and Main Street. This is incorrect. It further states that there is parking along both sides of the street in residential areas. This is incorrect. Directly south of Alma and Main, there is no parking on Alma on either side of the street because the street is narrow and curvy. Immediately north of Alma and Main, there is no parking on the west side as well.

- Page 3J-1, second bullet: The Gaffey Street/32nd Street intersection is not controlled by a traffic signal. There is a stop sign. This is a serious oversight and the traffic study needs to be revised to address the impacts to Gaffey Street, 30th street, and the Gaffey/Leavenworth entrance.
- Page 3J-2, third bullet (30th St) and Figure 3J-2 (Intersection Geometry): Please note that the intersection of 30th Street and Alma Street is controlled by a stop sign. This is a serious oversight and the traffic study needs to be revised to address the impacts to 30th Street.
- Page 3J-2: Emily Street, a north-south residential street located just south of the Project site, is not mentioned in the DEIR. Please correct. This oversight is particularly important because the proposed project plans athletic facilities in this location. Also consider the safety issues in connection with the turn from 36th Street west onto Emily Street. As the residents of this area know, and which cannot be demonstrated on a map, if this turn is not made sharply, the car will drive over the cliff into the Alma street canyon, approximately 200 feet down. See Attachment 3. Cars traveling north and uphill on Emily tend to overcorrect when turning east on 36th street, causing their cars to point straight into oncoming traffic on westbound 36th Street. See Attachment 9.
- Page 3J-3, Section 3J.2.3 Existing Transit Operations: The MTA line runs west on Paseo del Mar. Please correct.
- Page 3J-5, Study Intersections and Road Segments: Alma and 25th Street intersection: when there are cars parked on both side of Alma, there is barely enough room for two moving cars to pass each other going up and down the streets. See Attachment 10.
- Page 3J-5, Study Intersections and Road Segments: Gaffey and 25th street is a confusing and dangerous intersection. Drivers tend to gain speed traveling east on 25th, overshooting the light at 25th and Gaffey. It has been a common experience that these drivers then attempt to back up, striking the individual behind them.
- Page 3J-5, Study Intersections and Road Segments: The intersection of 30th Street and Alma Street is a stop-controlled intersection that should be included in the study. In addition, contrary

to the traffic analysis, we strongly believe that 30th Street, between Alma and Gaffey, will be a primary route to/from the proposed school. One only needs to look at a street map to determine that 30th Street is one of the most direct routes to/from the school from the east. This is particularly true if the designated drop-off site is closer to Alma and the Alma Street entrance.

- Page 3J-5, Study Intersections and Road Segments: In addition, the impact of this project on the Walker and 25th Street intersection and Leland and 25th Street intersection, (ensuring the safety of children walking to Leland Street Elementary School) both controlled by stoplights, should be studied. Both intersections are well-used. The traffic signal at Leland and 25th Street is a relatively recent stoplight erected soon after the death of a little boy on 25th street. This area is notorious for dangerous driving: drivers gain speed traveling down the hill on 25th towards Walker, attempting to beat the lights. After several accidents and his death, "Slow San Pedro" signs were placed on 25th Street properties.
- Page 3J-6, Section 3J.3.1: It should be noted that the proposed project site is located at the farthest south end of San Pedro. Principal access to this area will be primarily attained through vehicular traffic because of its remoteness and steep hills. Alma Street is a two lane street that is steep and narrow, with some blind spots due to curves. Therefore, this location discourages pedestrian and bicycle traffic in direct contradiction to the "Safe Routes to Schools" program, which is cited by the DEIR as a guide to build safety routes...
- Figure 3J-2: There are two figures with the same designation. Please correct.
- Figure 3J-4 Trip Distribution: Gaffey and 32nd Street, which eventually becomes Barlow-Saxton Road on the property, is a proposed entrance. It is a steep hill on a street that is so narrow that there is not room for two way traffic and so curvy road, you cannot see oncoming traffic. This road is also proposed for pedestrian traffic as well. Refer to Google Earth for width of road, quick elevation, curvy nature and currently no sidewalk. The Project Trip Distribution Pattern suggests that 55% of the traffic will enter/exit from this point. Please discuss in detail how 55% percent of the traffic will safely traverse this street. It is our position that this entrance is not user-friendly and

that 80% of the students will use the Alma Street entrance. Please advise the traffic study and discussion accordingly.

- As stated previously, we believe 30th Street will function as a primary access route to and from the school. Particularly in light of the inaccessibility of the school from Barlow-Saxton. The traffic study must be revised to show trip distribution on 30th Street. Other comments regarding this exhibit:
 - Intersection #6 does not show any trips on Pacific from the south. Please explain,
 - Intersection #7 shows no trips from the east on 37th Street to Alma Street. Are there no projected students or staff from the neighborhood to the east of Alma?
- Page 3J-8, Section 3J.4.2. Criteria for Determining Significance: In public hearings, LAUSD has stated that the proposed project will be a magnet school. The Service and Volume to Capacity ratio should change to .54. Please correct.
- Page 3J-10, Cumulative Traffic: As we have noted elsewhere in this critique, we believe the cumulative analysis substantially underestimates related and cumulative projects. The traffic study should be revised to include all related projects. Further, it has been continuously stated in public meetings that the proposed project will be an annex to San Pedro High School and students will be "shuttled" back and forth between the two schools. There is no information regarding the proposed project as an annex or details regarding shuttling in the DEIR. Please include and discuss these details and their impact on traffic, in particular, the anticipated routes, times, frequency and vehicular load of the shuttling.
- Page 3J-12, Table 3J-5, Trip Generation: This table includes a footnote "c", but we are not able to see what it relates to.
- Figure 3J-4, Project Trip Distribution Pattern:
 - The figure shows no traffic going north on Alma from west 37th Street in an attempt to enter the Alma street entrance. It shows no traffic going south on Alma as it leaves the Alma Street entrance to go east on 37th Street. This is a serious omission in the

traffic study. Further, it shows only 5% of traffic going north on Alma from west 37th Street and 5% of traffic going south on Alma to west 37th Street. The area north of Alma and Main is severely congested. It will be slowed by a stop sign at Alma and 30th. It will be slowed by the signal at Alma and 25th. Parking for the apartment buildings on each side further makes this area severely congested. It is reasonable to assume that drivers will avoid Alma from Main Street to 25th by going using the southern part of Alma to get to Gaffey and/or Western.

- The figure shows 55% of the traffic entering/exiting at the 32nd St/Barlow-Saxton Dr. entrance. This seems unrealistic when the school is located on the other side of the property. It is also unrealistic considering Barlow-Saxton Drive is a narrow, windy, hilly street, and will be congested due to PFOEC.
 - The figure indicates that there will be no traffic turning left from westbound 25th onto Alma or eastbound 25th from Alma. This seems unrealistic when the quickest way from 25th and Gaffey would be to go westward on 25th and turn on Cabrillo or Meyler and take Hamilton or turn left on Alma and 25th to avoid the winding and curving of Gaffey as well as the narrow, hilly and longer route of Barlow Saxton. The Project Trip Distribution Pattern should be restudied. The DEIR should be redrafted and recirculated.
- Page 3J-14, Mitigation Measure 3J.1: This measure appears to defer the preparation of a Neighborhood Traffic Management Plan. In our opinion this is fundamental to understand the impact of the project. CEQA states that mitigation measures cannot be deferred. See *Kings County Farm Bureau, supra*. Incidentally, what will be LAUSD's "fair-share" portion (%) of the study and how is the percentage determined?
 - Page 3J-14, Mitigation Measures 3J.1: We request the following proposed mitigation measures be discussed: 1.) Do not use the Alma/Main entrance; (as suggested by Dr. Vladovic at the 9/4/2008 public hearing: "I've had Facilities studying the closure of the Alma entrance or at

least, not using the entrance during peak hours." See Minutes, 9/4/2008, page 7.); 2.) Do not allow left hand turns from southbound Alma into the Alma/Main street entrance. 3.) Continue with no parking on west side of Alma Street from 30th to 37th; 4.) Designate the east side of Alma as "no stopping at any time" and "no loading and unloading of passengers".

- Pages 3J-15 through 17, Parking Capacity: We couldn't disagree more with the conclusion that the project would not result in inadequate parking capacity. The proposed plan thrusts all student parking on neighborhood streets. The rationale for this fundamental assumption needs to be fully explained and justified to the homeowners that would be burdened by this action. This is totally unacceptable.
 - The 28-acre site is clearly adequate to accommodate all student parking.
 - Does the 0.26 parking generation rate for suburban parking (ITE) account for regional differences and driving habits?
 - The fact that 564 vehicles could be accommodated on surrounding streets is irrelevant. The ill-conceived parking concept for this project does nothing but add another unacceptable impact on the neighborhood.
 - Does the traffic study include all 211 student generated trips? And, do all student trips drive and park on neighborhood streets? If so, why is there no trip distribution of student trips on local streets (see Figure 3J-4)?
- Page 3J-16, third paragraph: Reference is made to parking on 36th Street and Meyler Street. Will those students enter through the gates along 36th Street?
- Page 3J-17, first partial paragraph: There is a reference that adult school parking would "overlap with civic center uses". Why is there a reference to a civic center?
- Page 3J-17, Section 3J.4.4, Cumulative Impacts: The DEIR fails to consider other projects currently in the planning phase or under construction. These projects include, but are not limited to, the PFOEC expansion, AGCC expansion, traffic from the Long Beach Point project, and traffic from the proposed Marymount College expansion. The assumptions that not all related

projects will be approved and/or built, there will be unspecified mitigation measures, and the projects may be smaller are faulty. The cumulative impacts of traffic should be reconsidered. The DEIR should be reed and recirculated.

- Appendix H, Chapter 7, Section C: Indicates that there are 27 pick-up and drop-off spaces allocated on campus. It is estimated that 57 percent of all trips will be by car. This leaves an estimated 300 students to be picked up/dropped off on school property. Twenty seven allocated spots on campus for 300 students at the same time seem highly inadequate. Is it anticipated that students will be picked up/dropped off on adjacent streets? Will this increase traffic congestion? Will this jeopardize pedestrian safety? This school is to be an annex of San Pedro High School and a magnet school. Please discuss how this will affect traffic distribution.
- Appendix H, p.9: There is no mention of Emily south of the project site. Please correct. "Only Meyler Street has an intersection with Leavenworth Drive": this is incorrect. Please correct. "All of these roadways allow curbside parking along the single-family homes that are adjacent to each of these roadways": roadside parking has never been available to the site because there is no vehicle or pedestrian access from 36th to the site and it is a long walk to the Alma/Main street entrance.
- Chapter 4, Alternatives Analysis: A DEIR "must consider a reasonable range of alternatives to the project, or to the location of the project." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566; Pub. Resources Code, Section 21100, (b)(4). This DEIR failed to consider reasonable alternative to the project. For example, we firmly believe that the addition of Wind Turbines to this project (no matter how noble) is a red herring that has been included at the last minute as a way of illustrating how "green" LAUSD is. Moreover, we believe that the wind turbines were hastily included as a major design feature that could be eliminated to show that LAUSD is listening and responding to the concerns of the community. We completely reject the conclusion that removing the wind turbines reduces or avoids significant aesthetic impacts.

- Section 4.3.1: Alternate Education Facility: **Expand the use of PFOEC** to include this land to be used by all ages: kindergarten through high school. This would be consistent with the nature of the area: the unusual resource it provides with open land, military history, Korean bell, maritime history, a working port, marine life, historic lighthouse, and the whole outdoor experience.
- Section 4.5.2 Alternative Site: Some questions and comments about the Ponte Vista site:
 - Aesthetics – Why wouldn't wind turbines be proposed for this 24-acre site?
 - Biological Resources – We reviewed the EIR for Ponte Vista (Christopher A Joseph and Associates, 11/2/06) and make the following observations about errors in the Alternatives narrative (Page 4-12):
 - The site does contain native habitat in the form of some small stands of coastal sage scrub community (Figure IV.C-1).
 - It also includes stands of non-native grasses, which are currently being included by some jurisdictions in NCCPs and HCPs as an important vegetation community for habitat, foraging, etc.
 - Figure IV.C-6 depicts the California Gnatcatcher on the Ponte Vista site
 - Table IV.C-4 includes sensitive birds including the California Gnatcatcher and Coopers Hawk
 - Figure IV.C-10 depicts areas that are potentially subject to ACOE and CDFG jurisdiction
 - Hazardous Materials – Chapter IV.D of the Ponte Vista EIR and the appendix indicates that arsenic, selenium, hydrocarbons, asbestos and methane were found on the site. Moreover, a mitigation measure requires compliance with the City of Los Angeles 2004 Methane Ordinance.
 - Land Use and Planning – The Ponte Vista site is zoned for Open Space and Low Density Residential

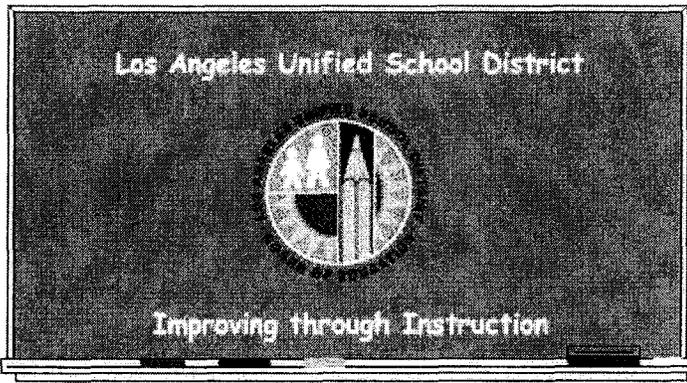
- o Alternatives that should be considered: 1. **FIX SAN PEDRO FIRST, SEE ATTACHMENT FOR ARCHITECTURAL SUGGESTIONS;** 2. An alternative site plan which relocates buildings and fields to minimize environmental impact on the neighborhood in terms of aesthetics, noise, traffic, and pedestrian safety; 3. Eliminate the Alma street entrance to vehicle traffic which would positively impact aesthetics, noise, traffic and pedestrian safety; 4. Eliminate the gymnasium which minimize the impact on noise and aesthetics for the neighborhood; 5. eliminate the pool for the same aforementioned reasons; 6. Eliminate the outdoor amphitheatre; 7. Consider the cumulative affects of any combination of Alternatives 1-6; 8. Fully utilize Cooper Street School; 9. Fully utilize POLA; 10. Fully utilize the elementary schools which are seeing a decline in population: elementary school should be up to 6th grade, middle school until 9th grade, opening up spaces in San Pedro High School; 11. consider elementary school until 8th grade as LAUSD is currently doing at Murcherson School with great success, particularly for those students with English as their second language; ~~see~~ ~~attachment~~ 12. Move 9th graders into their own academy which has been done at John H. Francis Polytechnic High Schools with great success, according to LAUSD. (See Daily News, February 10, 2008: 'Small Schools and Small Learning Communities'; 13. Consider schedule alternatives for San Pedro High School to minimize congestion in the hallways, for example: two hour class time blocks, shown to be affective in other local schools, alternating lunch periods, earlier start for seniors with earlier lunch so that they can leave.

- We've noticed a "Witness Post" on the property amongst some shrubs (lemonadeberry – rhus integrifolia?). This sign appears to have been placed by the U.S. Army Corps of Engineers. Why is this sign on the property and what does it mean? Why was this not addressed in the DEIR?
- Please address the concerns raised by Mr. David Bard, who is with the Marine Mammal Care Center at Fort MacArthur, at the 9/4/2008 public hearing. See 9/4/2008 minutes, pages 41-43.

Feeder Schools to San Pedro High School and more

School Names	03-04	04-05	05-06	06-07	07-08
7th Street	500	483	456	456	447
15th Street	728	715	699	691	677
Bandini	408	430	432	416	407
Barton Hill	743	764	733	763	720
Cabrillo	558	560	510	513	475
Crestwood	477	499	490	485	473
Leland	659	644	590	547	535
Park Western	389	384	379	372	381
Point Fermin	339	331	327	313	271
South Shores Magnet	482	485	457	471	467
Taper	668	597	562	532	510
White Point	492	487	462	445	429
Willenberg special ed	284	264	257	238	234
Totals	5499	5445	5199	5095	4902
Dana Jr	2011	1991	1928	1908	1860
Dodson	1421	1417	1460	1415	1454
Totals	3432	3408	3388	3323	3314
San Pedro High	2955	3106	3087	3078	3080
POLA			110	274	374
Narbonne Magnet	433	430	433	411	432
Narbonne SH	3047	3171	3132	3031	3003
Gardena	3050	3278	3291	3188	2970
Carson	5343	3662	3636	3523	3463
Totals	14828	3536	13689	13505	13322

Data from lausd.net
 school demographics
 Im 9/3/2008



[Select New School](#) - [Racial Ethnic History](#) - [English Learners](#) - [Student Attendance](#) - [Student Adjustment](#) - [Staffing Profile](#)

DANA MS

1501 S Cabrillo Ave
 San Pedro, Ca 90731
 Office - 310-241-1100
 Fax - 310-514-9925

Principal - Ball, Terry	Location Code - 8104	Local District - 8	Configuration - 6- 8
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1926	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/Dana_MS	

Racial Ethnic History

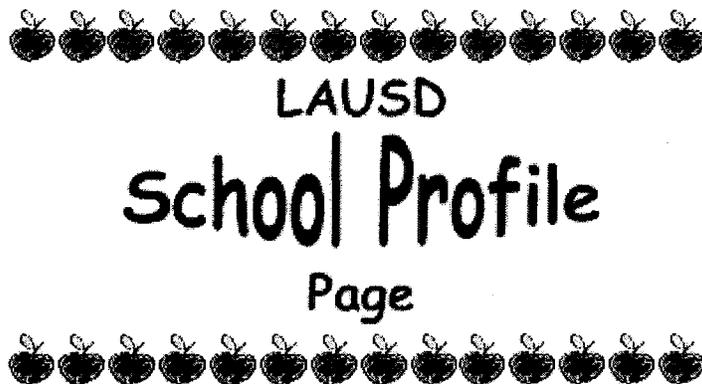
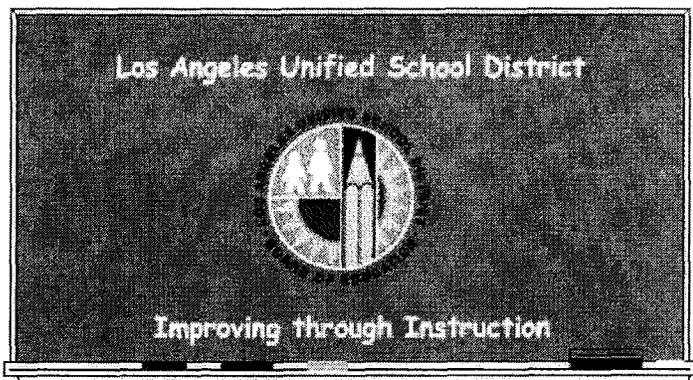
Student Racial Ethnic History																
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%		
2007-08	19	1.0	32	1.7	19	1.0	18	1.0	177	9.5	1316	70.8	279	15.0	1860	
2006-07	17	0.9	29	1.5	22	1.2	16	0.8	169	8.9	1366	71.6	289	15.1	1908	
2005-06	14	0.7	30	1.6	24	1.2	10	0.5	148	7.7	1393	72.3	309	16.0	1928	
2004-05	9	0.5	30	1.5	30	1.5	7	0.4	176	8.8	1415	71.1	324	16.3	1991	
2003-04	14	0.7	36	1.8	18	0.9	11	0.5	179	8.9	1417	70.5	336	16.7	2011	

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English Learners (EL)

Current EL Data: 2007-08											
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total	
6	0	0	0	0	0	0	81	0	2	83	
7	0	0	0	0	0	0	83	0	3	86	
8	0	0	0	0	0	0	82	0	2	84	
UG	0	0	0	0	0	0	37	0	2	39	
TOTAL	0	0	0	0	0	0	283	0	9	292	

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DODSON MS
 28014 Montereyna Dr
 Rancho Palos Verdes, Ca 90275
 Office - 310-241-1900
 Fax - 310-832-4709

Principal - Collier, Elmore	Location Code - 8110	Local District - 8	Configuration - 6- 8
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1960	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 25 Edward Vincent	Congress - 46 Dana Rohrabacher	Council - RPV Rancho Palos Verdes
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/Dodson_MS	

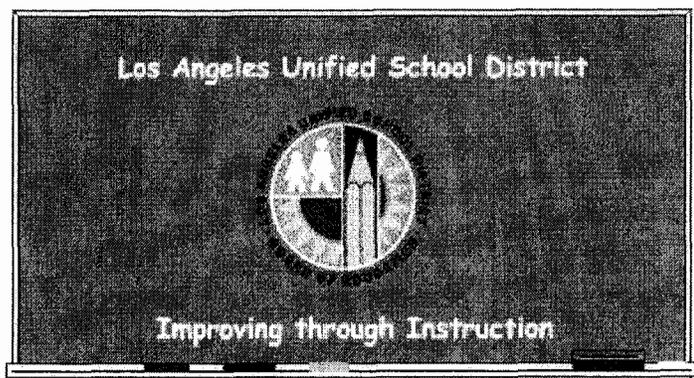
Racial Ethnic History

Student Racial Ethnic History															
Year	AI/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	4	0.3	22	1.5	34	2.3	8	0.6	126	8.7	1093	75.2	167	11.5	1454
2006-07	8	0.6	22	1.6	32	2.3	8	0.6	130	9.2	1040	73.5	175	12.4	1415
2005-06	12	0.8	22	1.5	30	2.1	11	0.8	156	10.7	1034	70.8	195	13.4	1460
2004-05	12	0.8	29	2.0	31	2.2	10	0.7	128	9.0	993	70.1	214	15.1	1417
2003-04	14	1.0	22	1.5	23	1.6	10	0.7	136	9.6	989	69.6	227	16.0	1421

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
6	0	0	0	0	0	0	44	0	0	44
7	0	0	0	0	0	0	72	0	0	72
8	0	0	0	0	0	0	62	0	0	62
UG	0	0	0	0	1	0	22	0	1	24



Select New School - [Racial Ethnic History](#) - [English Learners](#) - [Student Attendance](#) - [Student Adjustment](#) - [Staffing Profile](#)

LELAND EL
 2120 S Leland St
 San Pedro, Ca 90731
 Office - 310-832-0505
 Fax - 310-831-0837

Principal - Masero, Susan	Location Code - 4836	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1922	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site -	

Racial Ethnic History

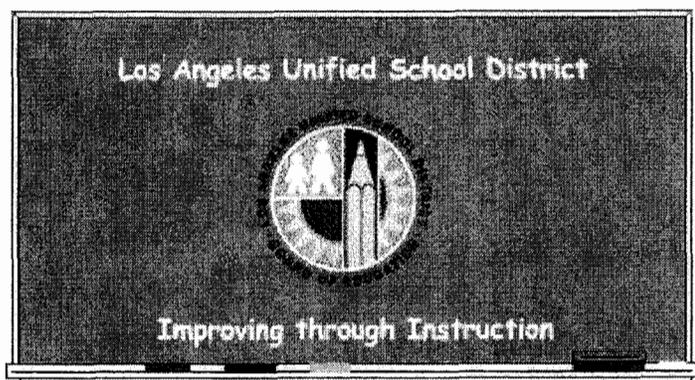
Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	12	2.2	9	1.7	14	2.6	5	0.9	44	8.2	360	67.3	91	17.0	535
2006-07	11	2.0	12	2.2	12	2.2	10	1.8	43	7.9	370	67.6	89	16.3	547
2005-06	14	2.4	16	2.7	13	2.2	9	1.5	44	7.5	404	68.5	90	15.3	590
2004-05	11	1.7	20	3.1	12	1.9	7	1.1	45	7.0	420	65.2	129	20.0	644
2003-04	9	1.4	18	2.7	9	1.4	8	1.2	45	6.8	433	65.7	137	20.8	659

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	10	1	2	13
1	0	0	0	0	1	0	20	1	2	24
2	0	0	0	0	0	0	8	0	1	9
3	0	1	0	0	1	0	5	0	0	7
4	0	0	0	0	0	0	12	0	1	13

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[Select New School](#) - [Racial Ethnic History](#) - [English Learners](#) - [Student Attendance](#) - [Student Adjustment](#) - [Staffing Profile](#)

POINT FERMIN EL
 3333 Kerckhoff Ave
 San Pedro, Ca 90731
 Office - 310-832-2649
 Fax - 310-833-4307

Principal - Taft, Bonnie	Location Code - 6137	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1912	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 25 Edward Vincent	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/Point_Fermin_EL	

Racial Ethnic History

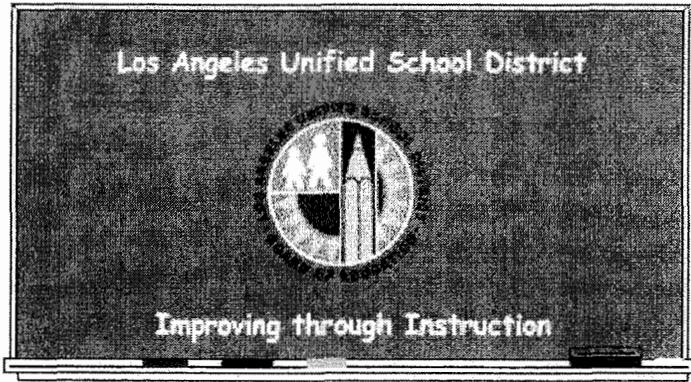
Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	7	2.6	3	1.1	4	1.5	4	1.5	31	11.4	125	46.1	97	35.8	271
2006-07	9	2.9	2	0.6	1	0.3	1	0.3	44	14.1	143	45.7	113	36.1	313
2005-06	6	1.8	3	0.9	3	0.9	2	0.6	44	13.5	155	47.4	114	34.9	327
2004-05	4	1.2	2	0.6	10	3.0	5	1.5	55	16.6	126	38.1	129	39.0	331
2003-04	3	0.9	6	1.8	19	5.6	3	0.9	52	15.3	129	38.1	127	37.5	339

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	0	0	1	1
1	0	0	0	1	0	0	1	0	0	2
2	0	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	2	0	0	2
4	0	0	0	0	0	0	0	0	1	1

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Select New School - Racial Ethnic History - English Learners - Student Attendance - Student Adjustment - Staffing Profile

WHITE POINT EL

1410 Silvius Ave
 San Pedro, Ca 90731
 Office - 310-833-5232
 Fax - 310-514-8726

Principal - O Brien, Lisa	Location Code - 7767	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1951	Title 1 - No
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 25 Edward Vincent	Congress - 46 Dana Rohrabacher	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/White_Point_EL	

Racial Ethnic History

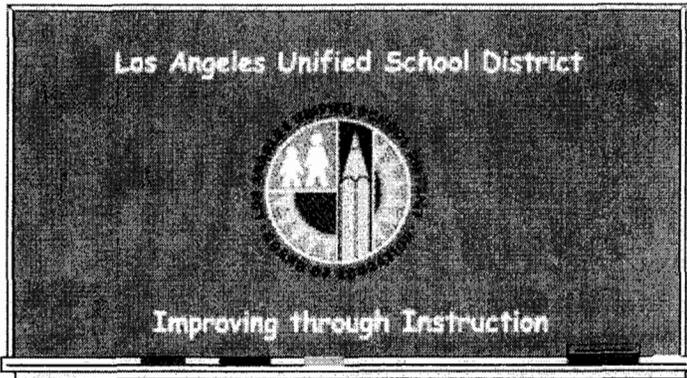
Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	3	0.7	23	5.4	11	2.6	3	0.7	33	7.7	110	25.6	246	57.3	429
2006-07	2	0.4	18	4.0	8	1.8	5	1.1	38	8.5	103	23.1	271	60.9	445
2005-06	4	0.9	14	3.0	8	1.7	5	1.1	35	7.6	110	23.8	286	61.9	462
2004-05	2	0.4	11	2.3	8	1.6	4	0.8	36	7.4	109	22.4	317	65.1	487
2003-04	3	0.6	10	2.0	9	1.8	2	0.4	58	11.8	98	19.9	312	63.4	492

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	0	0	1	1
1	0	0	0	0	0	0	0	0	0	0
2	0	0	0	0	1	0	0	0	2	3
3	0	0	0	0	0	0	0	0	1	1

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BARTON HILL EL

423 N Pacific Ave
 San Pedro, Ca 90731
 Office - 310-547-2471
 Fax - 310-832-4531

Principal - Mardesich, Louie	Location Code - 2315	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1909	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/Barton_Hill_EL	

Racial Ethnic History

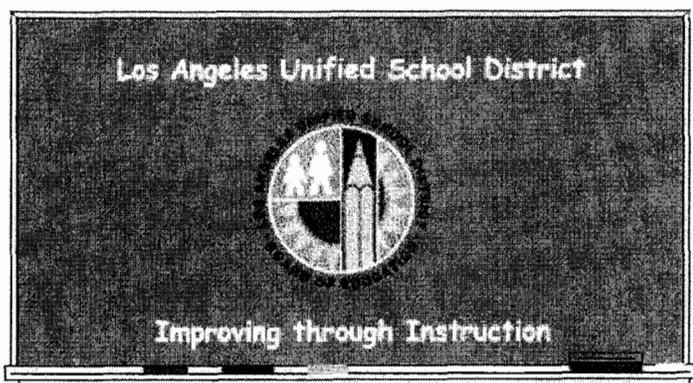
Student Racial Ethnic History															
Year	AI/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	6	0.8	0	0.0	1	0.1	4	0.6	44	6.1	644	89.4	21	2.9	720
2006-07	7	0.9	1	0.1	1	0.1	4	0.5	45	5.9	690	90.4	15	2.0	763
2005-06	2	0.3	2	0.3	2	0.3	4	0.5	46	6.3	664	90.6	13	1.8	733
2004-05	2	0.3	3	0.4	2	0.3	2	0.3	50	6.5	690	90.3	15	2.0	764
2003-04	4	0.5	2	0.3	0	0.0	1	0.1	46	6.2	671	90.3	19	2.6	743

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	50	0	0	50
1	0	0	0	0	0	0	70	0	0	70
2	0	0	0	0	0	0	60	0	0	60
3	0	0	0	0	0	0	48	0	0	48
4	0	0	0	0	0	0	41	0	0	41

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[Select New School](#) - [Racial Ethnic History](#) - [English Learners](#) - [Student Attendance](#) - [Student Adjustment](#) - [Staffing Profile](#)

TAPER EL
 1824 Taper Ave
 San Pedro, Ca 90731
 Office - 310-832-3056
 Fax - 310-548-4485

Principal - Steinbach, Doreen	Location Code - 7035	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1950	Title 1 - No
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/Taper_EL	

Racial Ethnic History

Student Racial Ethnic History															
Year	AI/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	5	1.0	22	4.3	17	3.3	7	1.4	25	4.9	267	52.4	167	32.7	510
2006-07	3	0.6	17	3.2	14	2.6	6	1.1	40	7.5	275	51.7	177	33.3	532
2005-06	3	0.5	14	2.5	11	2.0	6	1.1	48	8.5	298	53.0	182	32.4	562
2004-05	3	0.5	8	1.3	12	2.0	4	0.7	47	7.9	308	51.6	215	36.0	597
2003-04	1	0.1	8	1.2	12	1.8	4	0.6	55	8.2	366	54.8	222	33.2	668

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	1	0	0	1
1	0	0	0	0	0	0	7	0	1	8
2	0	0	0	0	0	0	1	0	0	1
3	0	0	0	0	1	0	1	0	0	2
4	0	0	0	0	0	0	1	0	0	1

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Select New School - Racial Ethnic History - English Learners - Student Attendance - Student Adjustment - Staffing Profile

15TH ST EL
 1527 S Mesa St
 San Pedro, Ca 90731
 Office - 310-547-3323
 Fax - 310-547-1156

Principal - Mak, Jennifer	Location Code - 3767	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1909	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site - www.lausd.k12.ca.us/15th_St_EL/	

Racial Ethnic History

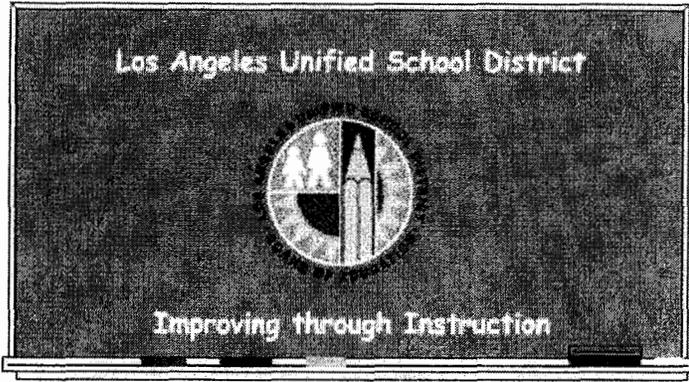
Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	8	1.2	10	1.5	4	0.6	4	0.6	50	7.4	582	86.0	19	2.8	677
2006-07	4	0.6	8	1.2	4	0.6	6	0.9	49	7.1	592	85.7	28	4.1	691
2005-06	3	0.4	8	1.1	5	0.7	4	0.6	54	7.7	593	84.8	32	4.6	699
2004-05	6	0.8	10	1.4	8	1.1	4	0.6	46	6.4	611	85.5	30	4.2	715
2003-04	5	0.7	11	1.5	6	0.8	2	0.3	48	6.6	633	87.0	23	3.2	728

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	67	0	5	72
1	0	0	0	0	0	0	71	0	1	72
2	0	0	0	0	0	0	59	0	1	60
3	0	0	0	0	0	0	53	0	3	56
4	0	0	0	0	0	0	31	0	1	32

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Select New School - Racial Ethnic History - English Learners - Student Attendance - Student Adjustment - Staffing Profile

BANDINI EL
 425 N Bandini St
 San Pedro, Ca 90731
 Office - 310-832-4593
 Fax - 310-547-3300

Principal - Fenton, Robert	Location Code - 2288	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1923	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site -	

Racial Ethnic History

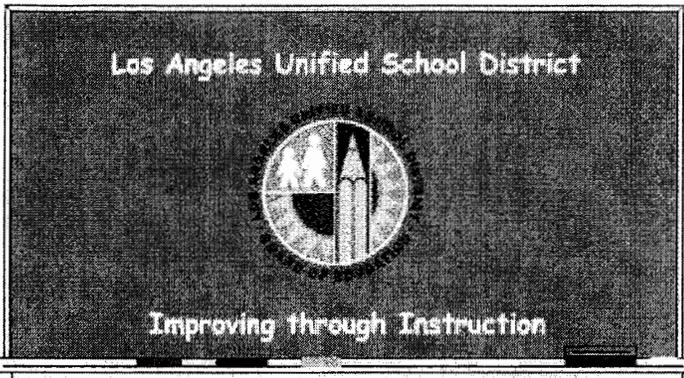
Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	3	0.7	1	0.2	4	1.0	3	0.7	26	6.4	350	86.0	20	4.9	407
2006-07	3	0.7	1	0.2	4	1.0	3	0.7	31	7.5	352	84.6	22	5.3	416
2005-06	3	0.7	1	0.2	5	1.2	4	0.9	29	6.7	364	84.3	26	6.0	432
2004-05	6	1.4	2	0.5	3	0.7	2	0.5	26	6.0	370	86.0	21	4.9	430
2003-04	8	2.0	1	0.2	5	1.2	1	0.2	23	5.6	349	85.5	21	5.1	408

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	17	0	0	17
1	0	0	0	0	0	0	16	0	1	17
2	0	0	0	0	1	0	12	0	0	13
3	0	0	0	0	0	0	24	0	0	24
4	0	0	0	0	0	0	11	0	0	11

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Select New School - Racial Ethnic History - English Learners - Student Attendance - Student Adjustment - Staffing Profile

CABRILLO EL
 732 S Cabrillo Ave
 San Pedro, Ca 90731
 Office - 310-832-6446
 Fax - 310-833-2699

Principal - Russo, Suzanne	Location Code - 2685	Local District - 8	Configuration - K- 5
Calendar - 1 TRK	Number of Tracks - 1	Year Opened - 1927	Title 1 - Yes
	Charter - No	Learn - Yes	SBM - No
Assembly - 54 Betty Karnette	Senate - 28 Jenny Oropeza	Congress - 36 Jane Harman	Council - 15 Janice Hahn
Supervisor - 4 Don Knabe	Board of Education - 7 Richard Vladovic	Web Site -	

Racial Ethnic History

Student Racial Ethnic History															
Year	Al/Alsk		Asian		Filipino		Pac Isl		Black		Hispanic		White		Total
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
2007-08	4	0.8	4	0.8	12	2.5	6	1.3	48	10.1	364	76.6	37	7.8	475
2006-07	3	0.6	4	0.8	15	2.9	4	0.8	52	10.1	398	77.6	37	7.2	513
2005-06	4	0.8	3	0.6	10	2.0	5	1.0	44	8.6	406	79.6	38	7.5	510
2004-05	5	0.9	3	0.5	9	1.6	6	1.1	57	10.2	433	77.3	47	8.4	560
2003-04	4	0.7	4	0.7	14	2.5	5	0.9	48	8.6	451	80.8	32	5.7	558

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English Learners (EL)

Current EL Data: 2007-08										
Grade	Armenian	Cantonese	Korean	Farsi	Pilipino	Russian	Spanish	Vietnamese	Other	Total
K	0	0	0	0	0	0	23	0	2	25
1	0	0	0	0	1	0	29	0	0	30
2	0	0	0	0	1	0	17	0	1	19
3	0	0	0	0	0	0	18	0	1	19
4	0	0	0	0	0	0	14	0	1	15

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"Why is LAUSD's Enrollment Declining if the Los Angeles Region's Population is Growing?"

Valerie Edwards, Chief Enrollment Analysis Coordinator
Mary Ehrenthal Prichard, Senior Boundary Coordinator

Master Planning and Demographics, Los Angeles Unified School District

ABSTRACT

In this paper we look into possible explanations for the Los Angeles Unified School District's 'trend-bucking' behavior by examining and contrasting LAUSD student population dynamics relative to the populations of LA City, LA County and the greater Southern California region. Our working hypothesis is that the population growth being observed in these areas is not being fueled by increases in households with school-aged children who would be candidates for attending LAUSD, but rather by increases in households with few or no children.

Further, although we had been expecting a decline in LAUSD enrollment due to a decrease in LA County births since 1990, the decline seems to be coming later, and more steeply, than would have been expected if it were being driven by the decreasing number of births alone. Preliminary evidence suggests that out-migration is taking place among households whose children would have historically attended LAUSD. Those patterns, in conjunction with declining births, while being offset in the aggregate by continued County growth, may be affecting both the timing and the rate of decline we are observing in LAUSD's annual enrollments.

California has been experiencing steady population growth for decades. Most recently, the State's population grew from approximately 34 million in 2000 to over 36.8 million in 2005, and this trend is expected to continue, with planners forecasting that the State will grow to almost 44 million by the year 2020 (5).

Overall, Southern California, which includes Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, has grown from 16.37 million in 2000 to 17.92 million in 2005, an increase of 9.4% (5). There is regional variation to this growth, with a clear contrast between coastal and inland county population dynamics, with the Inland Empire (San Bernardino and Riverside counties) experiencing the greatest growth in population. Since 2000, Riverside County has grown over 21% and its neighbor, San Bernardino County has grown almost 14%. Los Angeles County grew 7% within the same time period. A net positive flow of domestic migrants appears to have been the main reason for growth in the Inland Empire, while Los Angeles County has experienced a net *negative* flow from domestic migration. Its growth continues to be based mainly on natural increase and a net positive flow of international migrants from Latin America and Asia.

Los Angeles County has grown approximately 15.3% since 1990, gaining approximately 1.36 million people to bring its population to an estimated total of 10.22 million in 2005 (5). Much of the growth within LA County has been driven by growth in the Santa Clarita, San Fernando, and San Gabriel Valley areas (2). Approximately 27.8% of California's total population now resides in Los Angeles County (5). It is important to note that, while growth in LA County continues, not all of the County's growth is occurring within the boundary of the Los Angeles Unified School District.

Overwhelmingly, the largest source of LAUSD population resides within the City of Los Angeles. Between the years of 2000-2005, the City of Los Angeles experienced an approximate growth of 7%, still one of the largest absolute population increases of any major U.S. city during that time period. Approximately 10.7% of the total population of the State of California currently reside in the City of Los Angeles. (2,5). During the decade spanning 1990-2000 much of the City's growth was concentrated in the San Fernando Valley, and to a lesser extent, the Westwood and Palms areas of West Los Angeles (1).

Mirroring this growth has been a huge rise in the demand for, and cost of, housing. Over 51,000 new units have been built in Los Angeles City since 1998, and, by late 2005, planners were estimating that another 9,000 units would be needed to meet year-end demand (2). The current patterns of housing construction do not appear to be meeting the demand for affordable housing, either for would-be homeowners or renters. This disconnect between the supply and demand of affordable housing has led to some of the lowest home ownership rates in the state, and a city population that has one of the largest proportions of its residents spending more than 30% of household income on housing (8).

The Los Angeles Unified School District (LAUSD), the nation's second-largest public school system, serves almost the entire City of Los Angeles, as well as part or all of more than 27 other incorporated and unincorporated areas, enrolling approximately 43% of the entire K-12 student population of Los Angeles County. Up until the 2003-2004 school year, student enrollment trends were generally matching surrounding population trends, growing from 625,461 students in 1990 to a peak of 746,831 students in 2002. In 2003, however, enrollments decreased slightly to 746,610, then more sharply in 2004 to 742,090, and are currently expected to continue to decline steeply through at least 2008, despite continuing projected population growth for the surrounding County and City populations (7,4).

LAUSD is not the only large California school district experiencing enrollment decline while its surrounding County population continues to grow. Enrollments within LAUSD's four major neighboring unified school districts, San Diego, Long Beach, Fresno and Santa Ana, also declined within the last two years while simultaneously experiencing population growth within their city and county boundaries.

Demographic planners at LAUSD had been expecting to see some decline in LAUSD enrollment, because the number of children being born in LA County --- the children who would, five years later, become LAUSD's next kindergarten cohorts -- had been dropping since 1990. What has been observed, however, is that the decline seems to be coming later, and more steeply, than would have been expected if it were being driven by the decreasing number of births alone.

One possible reason for the divergence in direction between LAUSD's student enrollment decline and the population growth being observed in the greater Los Angeles region may be that the growth being observed is not being fueled by increases in households with school-aged children who would be candidates for attending LAUSD, but rather by increases in households with fewer or no children. These households may be better positioned to adapt to a rapidly changing housing market, where the median housing price in California escalated from \$211,500 in 2000 to \$498,800 in 2005 (3), and has been projected to increase to \$523,150 by the end of 2005 and another 10% to \$575,500 in 2006 (6). A similar trend has impacted California's rental market as well.

Of particular importance to the LAUSD is the decline of affordable housing within LAUSD's boundaries. Communities such as Jefferson Park and North Hollywood are two examples of areas that are becoming unaffordable for middle and lower income residents, putting home ownership and rental opportunities out of the reach of the households that would have historically been able to afford them. In North Hollywood, median household income was \$33,215 in 2000 but the median housing price for a single family detached home outpaced household income and currently stands at \$643,044, a price that would require an annual family income of \$147,826 to afford (6). Los Angeles' rental market has also seen a steep rise in prices. Since 2001, median rents for 1-bedroom units have increased 42.5%, and now stand at \$945 within the Los Angeles-Long Beach Metropolitan Area (10).

Partly due to the heated regional housing market, there has been an a positive net domestic out-migration from LA County, with many migrants "flowing" to other counties within Southern California, mainly eastward to the Inland Empire, but some also to Orange, Ventura and to Kern Counties (9). Riverside County, eastward in the Inland Empire, grew by 21.5% between 2000 and

2005, making it the fastest growing within the state of California and one of the fastest growing counties nation-wide (4,5). Migrants are also flowing out of California to states such as Nevada and Arizona.

Overall, these patterns suggest that, in conjunction with declining births, migration out of Los Angeles County, and out of California altogether, while being offset in the aggregate by continued County growth, may be affecting both the timing and the rate of decline we are observing in LAUSD's annual enrollments. In this paper we will look more closely into migration and other possible explanations for LAUSD's 'trend-bucking' behavior by examining and contrasting LAUSD student demographic dynamics relative to the populations of LA City, LA County and the larger Southern California region.

References:

- 1) City of Los Angeles Department of Planning Demographic Research Unit (<http://cityplanning.lacity.org/dru/drudirect.htm>)
- 2) Southern California Association of Governments (www.scag.ca.gov)
- 3) Data Quick Real Estate News (www.dqnews.com)
- 4) US Census Bureau (www.census.gov)
- 5) California Department of Finance (www.dof.ca.gov)
- 6) California Association of Realtors (www.car.org)
- 7) Los Angeles Unified School District , Master Planning and Demographics
- 8) The State of Southern California's Housing. The Paul and Goldy Lewis Center for Regional Policy Studies. Paul Ong, et al.
- 9) Internal Revenue Service, Statistics of Income Division, 2005, SOI County-to-County Migration Flows, 1999-2004, prepared by Mary Prichard and the Master Planning and Demographics Unit of LAUSD.
- 10) Department of Housing and Urban Development, SCHEDULE B - FY 2006 FINAL FAIR MARKET RENTS FOR EXISTING HOUSING

**LOS ANGELES UNIFIED SCHOOL DISTRICT
Board of Education Report**



Report Number:	473-07/08 (Revised)
Date:	June 24, 2008
Subject:	New Construction SEP Amendment to Redefine South Region High School No. 15
Responsible Staff:	
Name	Joseph A. Mehula, Chief Facilities Executive
Office/Division	Facilities Services Division
Telephone No.	(213) 241-4811

A. EXECUTIVE SUMMARY

- Action Proposed:** Approve revision of the project definition for South Region High School No. 15 from 1,215 seats to 810 seats and amendment of the New Construction Strategic Execution Plan accordingly.
- Staff Recommendation and Rationale** Staff recommends that the Board of Education approve the revision of the project definition for South Region High School No. 15 from 1,215 seats to 810 seats. The relief provided by the new high school will allow San Pedro High School to operate on a two-semester calendar if 810 new seats are constructed.
- Background:** On May 8, 2007, the Board of Education approved the project definition for South Region High School No. 15 as a 1,215-seat high school. One of the criteria for redefinition of a Strategic Execution Plan project is shifts in demographic projects. Subsequent changes in demographics projections for South Region High School No. 15 show building an 810-seat school will allow San Pedro High School to maintain a two-semester calendar.
- Policy Implications:** This action helps facilitate the Board-adopted New Construction Strategic Execution Plan.
- Budget Impact:** The total revised project budget for South Region High School No. 15 is \$114,631,777. The new budget for the redefined project will be \$102,844,507. Funding will be provided by state and local bond funds.
- Issues and Considerations** The proposed project will provide relief primarily for San Pedro High School, which is currently operating on a two-semester calendar.
- Effect of "yes" vote:** Board action authorizes staff to proceed with a new school based on the revised project definition, which is appropriately sized to provide needed relief.



**LOS ANGELES UNIFIED SCHOOL DISTRICT
Board of Education Report**

Effect of "no" vote:

Non-approval of the project redefinition would require staff to proceed with the current project definition of 1,215 high school seats, which would provide more seats than needed to meet the two-semester goal.



B. BOARD REPORT

- Action Proposed:** Approve revision of the project definition for South Region High School No. 15 from 1,215 seats to 810 seats and amendment of the New Construction Strategic Execution Plan accordingly.
- Expected Outcomes:** Approval of the redefined project will allow staff to proceed with design and environmental assessment activities for an 810-seat high school. The size and budget of the school will be adjusted to reflect the new project definition.
- Board Options and Consequences:** Redefinition of the project will allow the District to achieve the goal of providing two-semester neighborhood high school seats in this area of the District for a reduced cost. If South Region High School No. 15 is not redefined, staff would proceed with the current definition of 1,215 seats, which is more than what is required to provide two-semester neighborhood high school seats and would result in higher construction costs.
- Policy Implications:** This action helps facilitate the Board adopted New Construction Strategic Execution Plan.
- Budget Impact:** This project was included in the New Construction Two-Semester Neighborhood School Program definition list adopted by the Board on October 23, 2007. The revised project budget for South Region High School No. 15 is \$114,631,777. The budget will decrease by \$11,787,270 to reflect the smaller school size and reduced construction costs. Therefore, the new budget for South Region High School No. 15 will be \$102,844,507. Funding for this project is from state and local bonds.
- Issues and Analysis:** School Demographic Data

ELIEVED SCHOOL	SITE ACREAGE	2007-08 CALENDAR	2007-08 2- SEMESTER CAPACITY	2007-08 OPERATING CAPACITY	2007-08 ACTUAL ENROLLMENT	2007-08 RESIDENT ENROLLMENT	PLANNING 2- SEMESTER CAPACITY	PORTABLE CLASSROOMS (EXCLUDES CLASSROOMS TO BE REMOVED)
San Pedro High School	22.9	1 TRK	3,538	3,538	3,561	3,560	3,168	47

- Committee Information:** This item is not scheduled to appear on the agenda of any Board Committee.
- Bond Oversight Committee Recommendations:** The School Construction Bond Citizen's Oversight Committee took action at its June 18, 2008 meeting on this item and failed to adopt a resolution by a vote of six ayes, three nays and one abstention. Even though a majority voted in favor, there were insufficient affirmative votes to approve the resolution supporting the project. (Seven ayes were needed.)



LOS ANGELES UNIFIED SCHOOL DISTRICT
Board of Education Report

Reporting Requirements and Benchmarks:

Progress is reported monthly in the New Construction Monthly Status Report and updated annually in the New Construction Strategic Execution Plan. Facilities Services Division status reports are posted on www.laschools.org.

Accountable Staff:

Rod Hamilton, Real Estate Development Team Manager

Applicable Board Delegations:

Superintendent's Comments:

The Superintendent recommends approval of this action.

Miscellaneous Issues and Matters:

None.

Desegregation Impact Statement attached

Division of Accountability and System-wide Performance

Informative

Respectfully submitted,

DAVID L. BREWER III
Superintendent of School

APPROVED &
PRESENTED BY:

APPROVED BY:

JOSEPH A. MEHULA
Chief Facilities Executive
Facilities Services Division.

DR. JAMES MORRIS
Chief of Staff

LOS ANGELES UNIFIED SCHOOL DISTRICT

SCHOOL CONSTRUCTION BOND CITIZENS' OVERSIGHT COMMITTEE

Constance Rice, Chair
L.A. City Controller's Office

Scott Folsom, Vice Chair
Tenth District PTSA

David Crippens, Secretary
L.A. Area Chamber of Commerce

Elizabeth Bar-EI
LAUSD Student Parent

Christopher Espinosa
L.A. Mayor's Office

Charles Bergson
LAUSD Student Parent

David Jenkins
Associated General Contractors
of California

Lynda Levitan
Thirty-First District PTSA

Anastacio Medina
BREATHE California

Wendy Watanabe
John Naimo - *Alternate*
County of Los Angeles

Richard Slawson
L.A. Co. Federation of Labor,
AFL-CIO

Virginia Tanzmann
American Institute of Architects

Betty Valles
AARP

(Vacant)
California Taxpayers' Association

(Vacant)
Environmental Justice/Civil
Rights Group

Joseph P. Buchman – Legal Counsel
Burke, Williams & Sorensen, LLP

Thomas A. Rubin
Oversight Committee Consultant

Gary C. Anderson
Director
Frank Padilla
Administrator

RESOLUTION 2008-33

BOARD REPORT NO. 473-07/08

**NEW CONSTRUCTION STRATEGIC EXECUTION PLAN AMENDMENT -
PROJECT RE-DEFINITION FOR SOUTH REGION HIGH SCHOOL NO. 15**

WHEREAS, on May 8, 2007 the Board of Education approved the project definition for South Region High School No. 15; and

WHEREAS, the current project definition for South Region High School No. 15 as described in the New Construction Strategic Execution Plan is for 1,215 seats; and

WHEREAS, South Region High School No. 15 is currently defined as relieving San Pedro High School; and

WHEREAS, the Board of Education approved action on October 23, 2007 reaffirming the District's commitment to providing a neighborhood school operating on a traditional, two-semester calendar for all students; and

WHEREAS, recent changes in demographic projections for South Region High School No. 15 show that building an 810-seat high school will allow San Pedro High School to maintain a two-semester calendar; and

WHEREAS, Facilities Services Division has concluded (1) that amending the Facilities Strategic Execution Plan for the project re-definition of South Region High School No. 15 will facilitate implementation of the New Construction Strategic Execution Plan, and (2) that the proposed amendment will not adversely affect the District's ability to successfully complete the New Construction Strategic Execution Plan;

Resolution 2008-33
New Construction Strategic Execution Plan Amendment – Project Re-definition for South Region High School No. 15
Page -2-

NOW, THEREFORE, BE IT RESOLVED THAT:

1. The School Construction Bond Citizens’ Oversight Committee recommends that the Board of Education adopt an amendment to the New Construction Strategic Execution Plan, for the project re-definition of South Region High School No. 15, as described in attached Board Report No. 473-07/08.
2. This resolution shall be transmitted to the Los Angeles Unified School District Board of Education and posted on the Bond Oversight Committee’s website.
3. The District is directed to track the above recommendation and to report on the adoption, rejection or pending status of the recommendation as provided in section 6.2 of the Charter and Memorandum of Understanding between the Oversight Committee and the District.

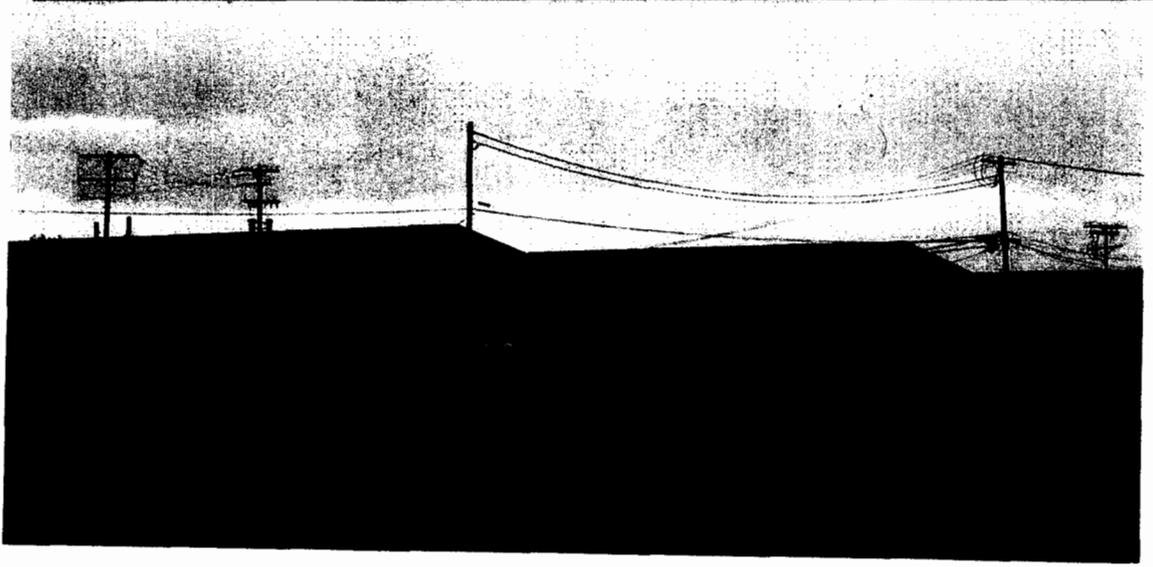
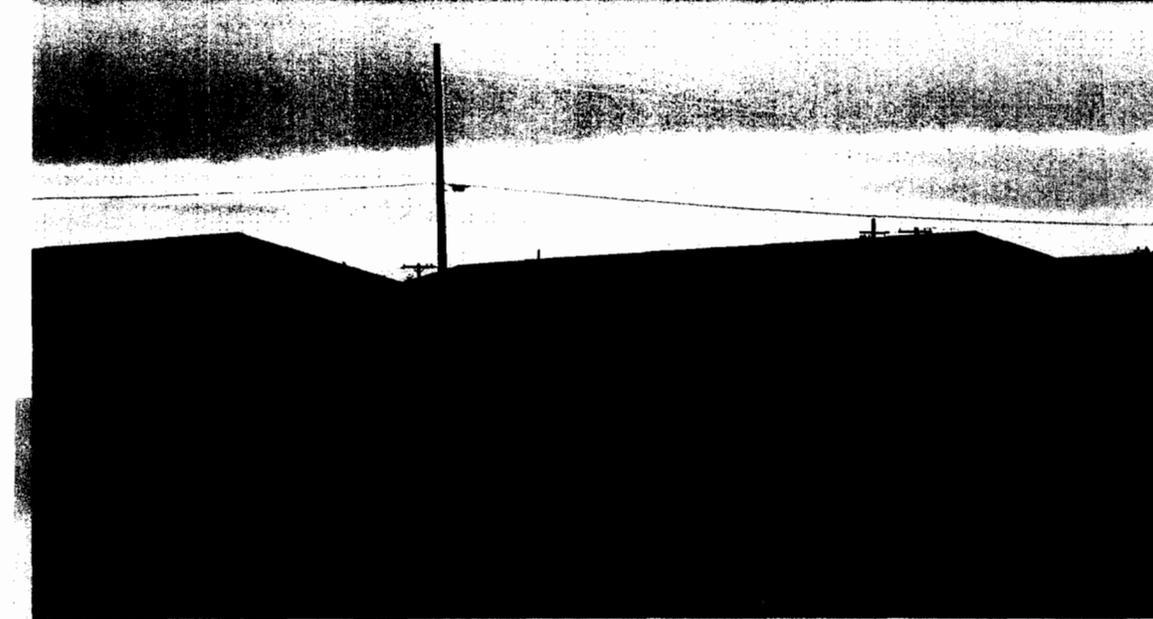
NOT ADOPTED on June 18, 2008 by the following vote:

AYES: 6 (Minimum 7 Required) ABSTAIN: 1

NAYS: 3 ABSENT: 3

Constance Rice
Constance Rice
Chair

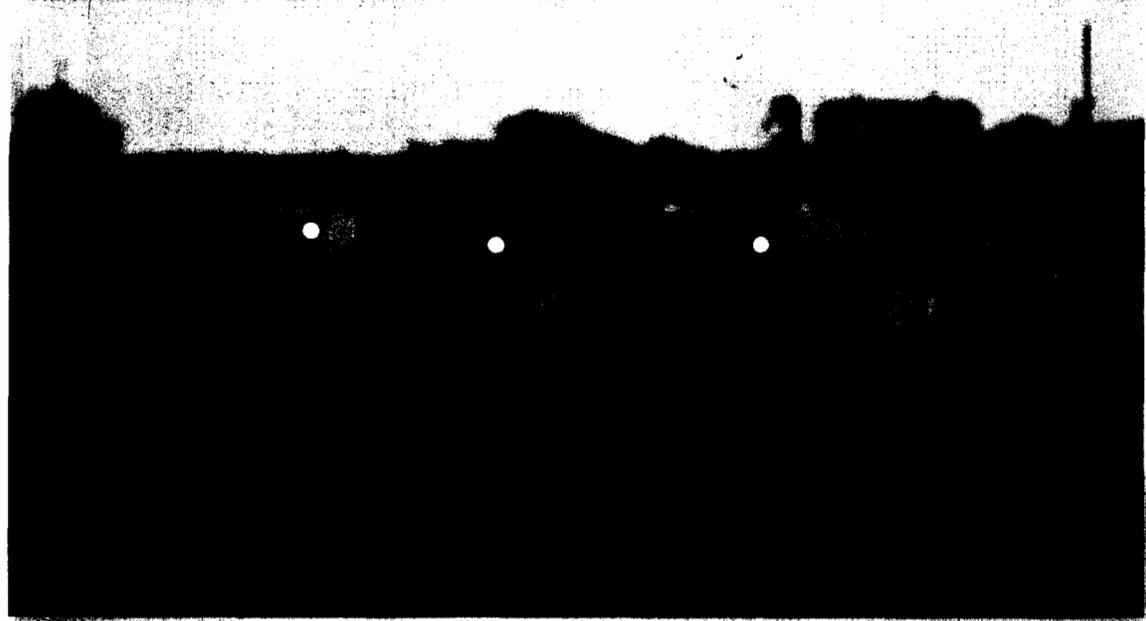
Scott Folsom
Scott Folsom
Vice Chair



VIEW FROM 3164 ALMERIA - KITCHEN WINDOW
LOOKING AT (ES) 2 see ATT, 4; ALSO (ES) 3, 4, 5
PROPOSED PROJECT VIEW: FOOD SERVICE, TRASH & LOADING

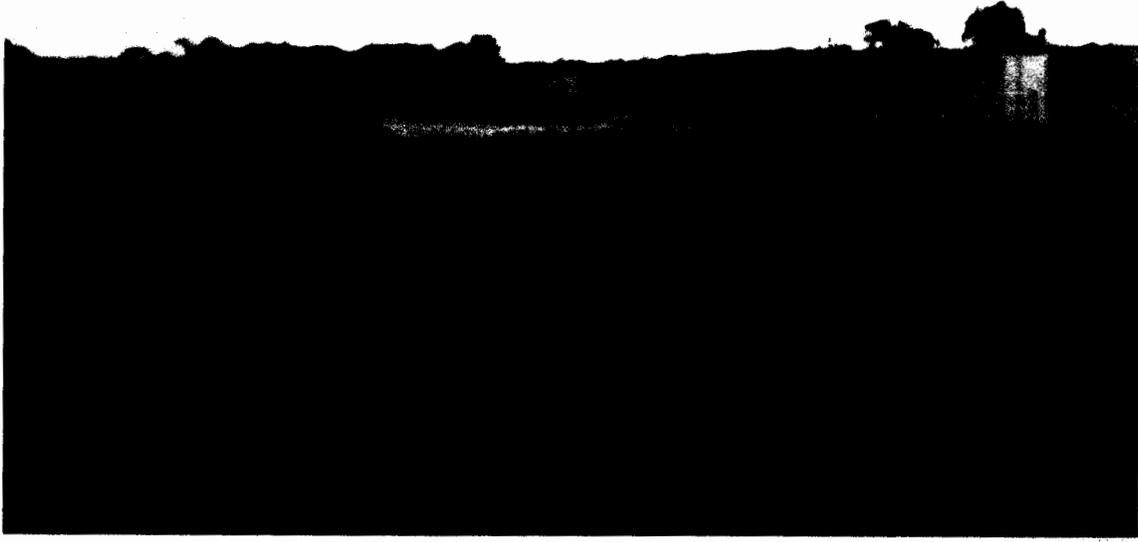


3164 ALMERIA
2ND STORY WINDOW



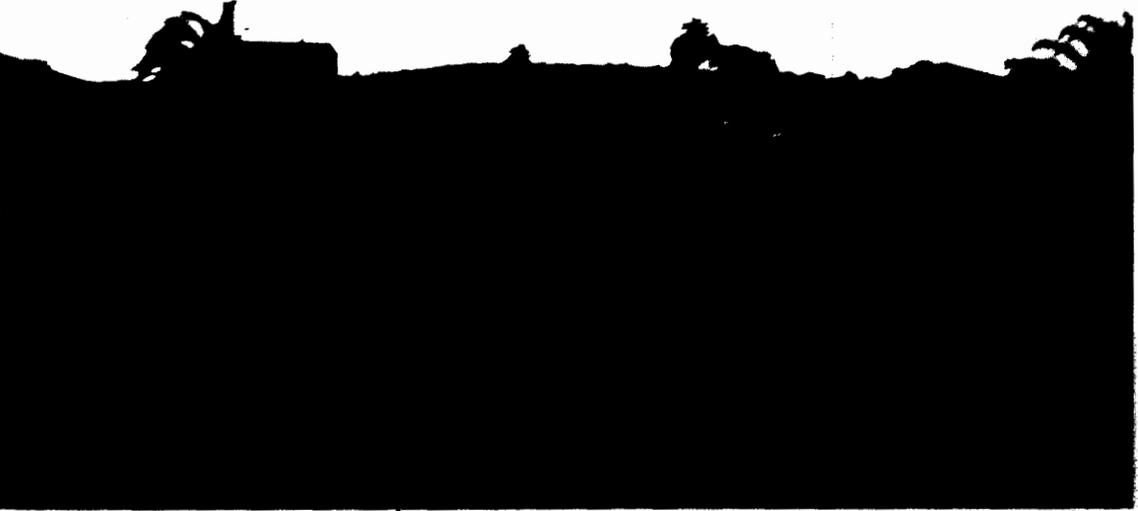
LOOKING AT
RS 172 - SEE ATT. 4
FUTURE VIEW; FOOD SERVICE, TRASH, LOADING, GYM, ADMIN





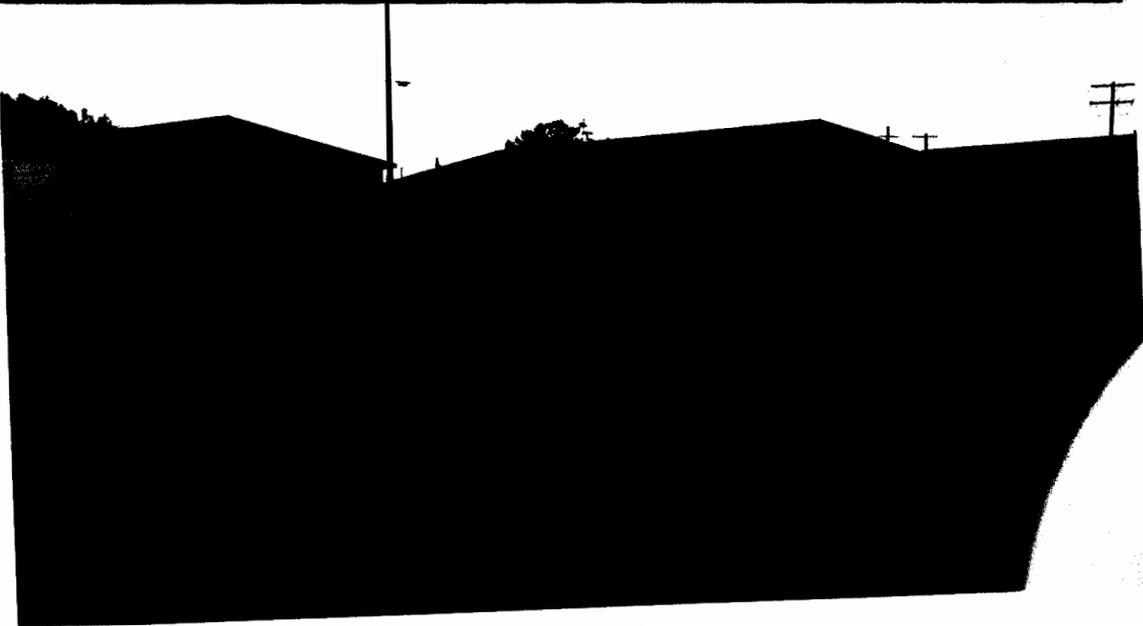
↑ BACK DOOR +

LOOKING AT ES (1)
FUTURE ADMIN BLDG



↑ 3170 ALMERIA ST.
VIEW FROM KITCHEN

LOOKING AT
(ES) 2 + ES 3
KITCHEN, TRASH
+ GYM



↑
LOOKING AT
(ES) 4 + 5;
FUTURE GYM



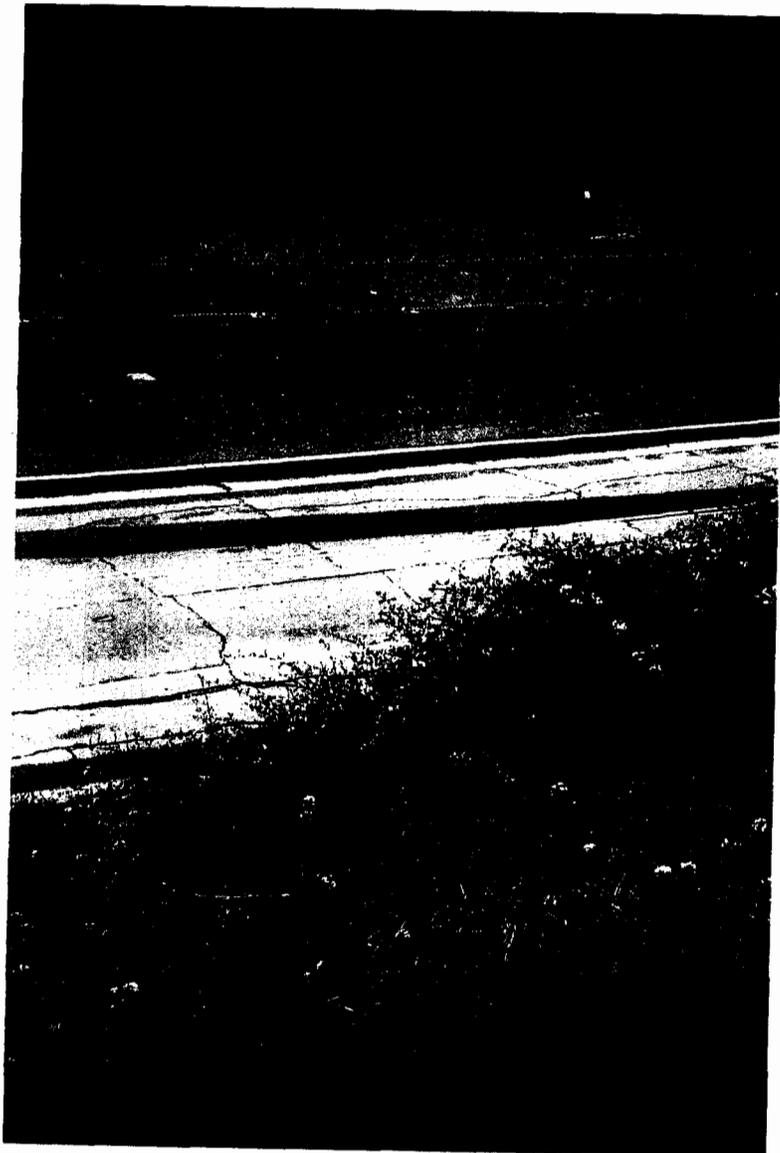
VIEW FROM 3412 ALMERIA
NOTE PROXIMITY TO ALMA

By ARROW PICTURE #1 LOWER LEFT
- FUTURE VIEW: GYM, ATHLETIC FIELDS





3412 ALMERIA
NOTE PROXIMITY TO ROAD
(ALMA)



3462 ALMERIA

NOTE:

- 1) PROXIMITY OF RESIDENCE TO ALMA
- 2) NARROWNESS OF ALMA
- 3) NO SIDEWALK

FUTURE VIEW:
ATHLETIC FIELDS



VIEWS

FROM

3428

ALMERIA

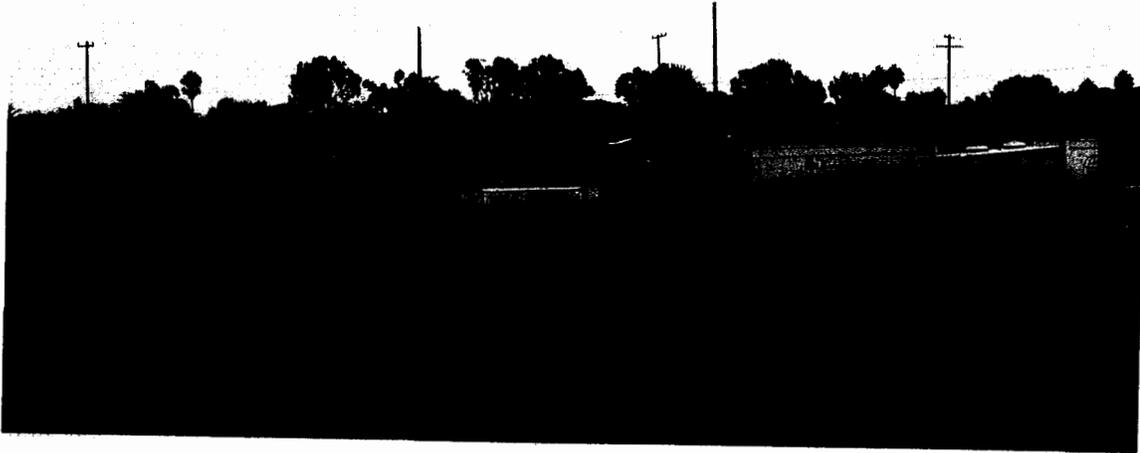
FUTURE VIEWS:

GYM +

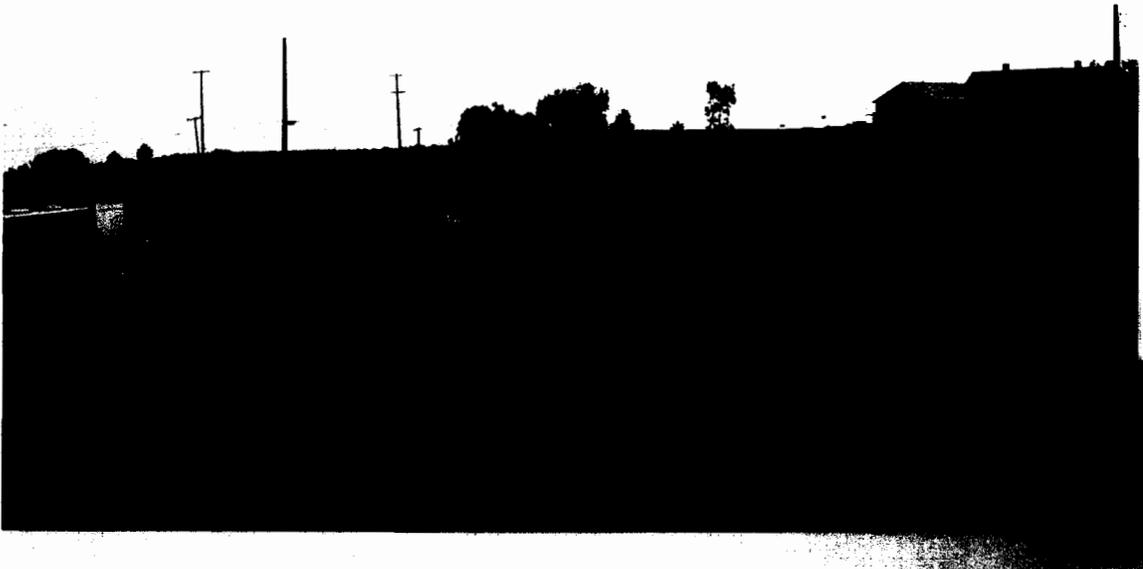
ATHLETIC
FIELDS



VIEWS
FROM
3462
ALMERIA

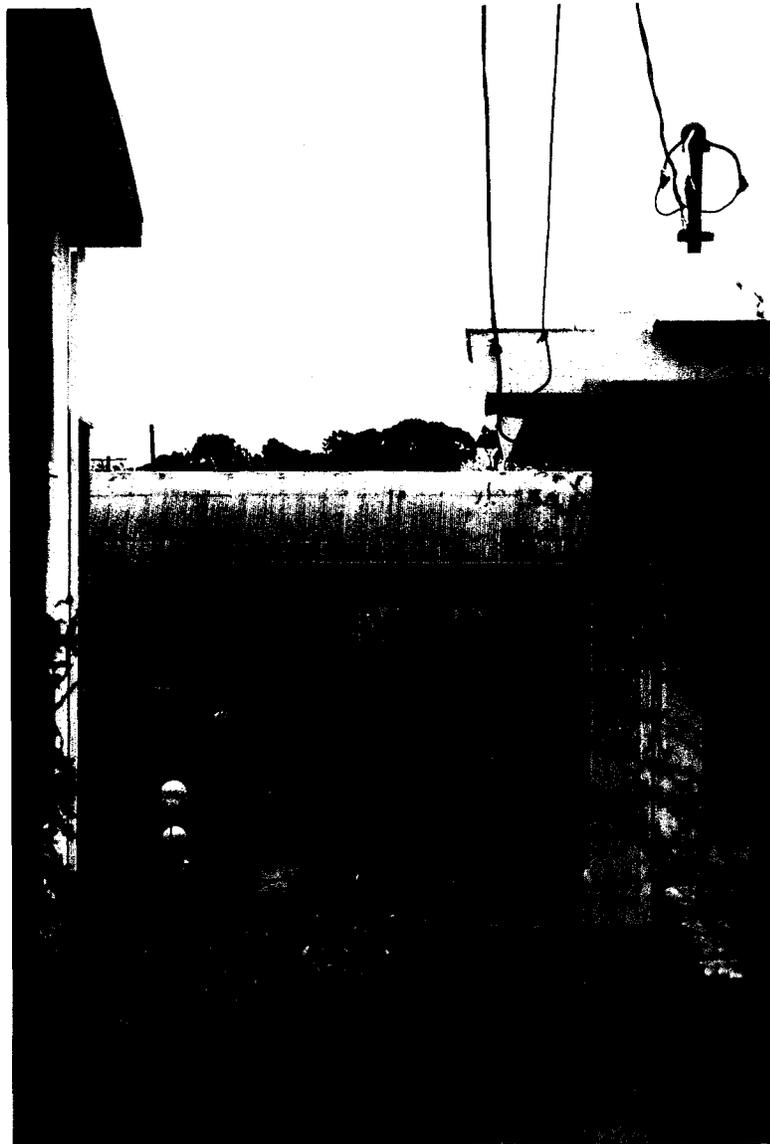


FUTURE VIEW:
BUILDING E+F,
ATHLETIC FIELDS
GYM
PARKING
(SEE ATT. 4)





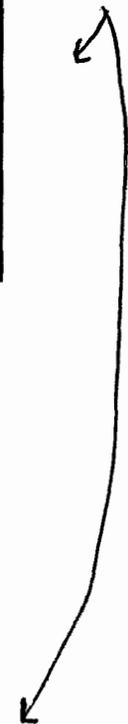
VIEW
FROM WEST
SIDE OF
ALMERIA



VIEW FROM
3435 ALMERIA
SIDEWALK;
RESIDENCE
IS BUILT TO
LOOK OUT ON
PROPERTY of
CATALINA



VIEWS
FROM
3476 +
3477
ALMERIA



← 36 TH ST
RUNNING
ALONG
SOUTH SIDE
OF PROPERTY;
NOTE DEAD
END INTO
CANYON



← 36TH ST. RUNNING
ALONG SOUTH BORDER;
EMILY RUNS NORTH-
SOUTH. NOTE: IF
TURN FROM 36TH
TO EMILY MISSED,
CAR PLUNGES
INTO ALMA CANYON;
NOTE: NARROW, CURVY
ALMA ROAD AT
BOTTOM OF PICTURE

← NO PARKING ALLOWED
EAST + WEST SIDE OF
ALMA DUE TO NARROW
+ CURVY TURNS, BLIND
SPOTS

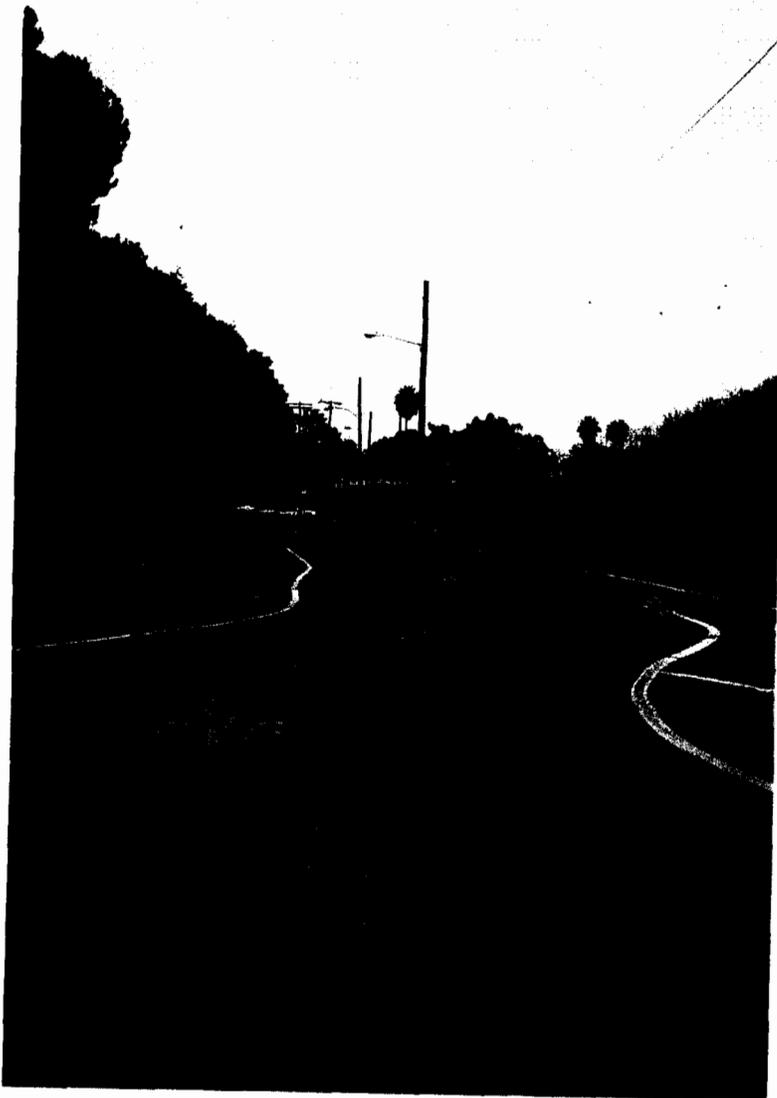


ALMA
• NO SIDEWALK
• NARROW
• PROXIMITY
TO RESIDENCE
EAST SIDE
OF ALMA



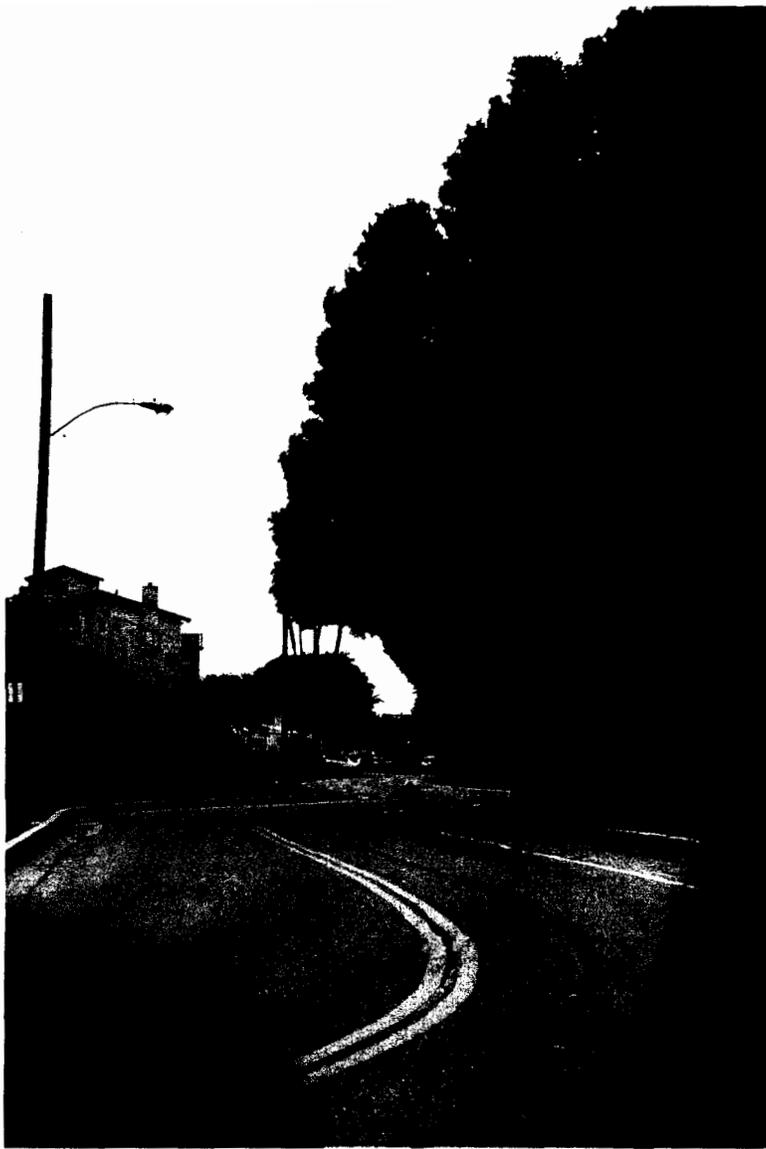
ALMA

HOME ON
EAST SIDE;
PROXIMITY
TO ROAD;
NO SIDEWALK;
NO PARKING



ALMA

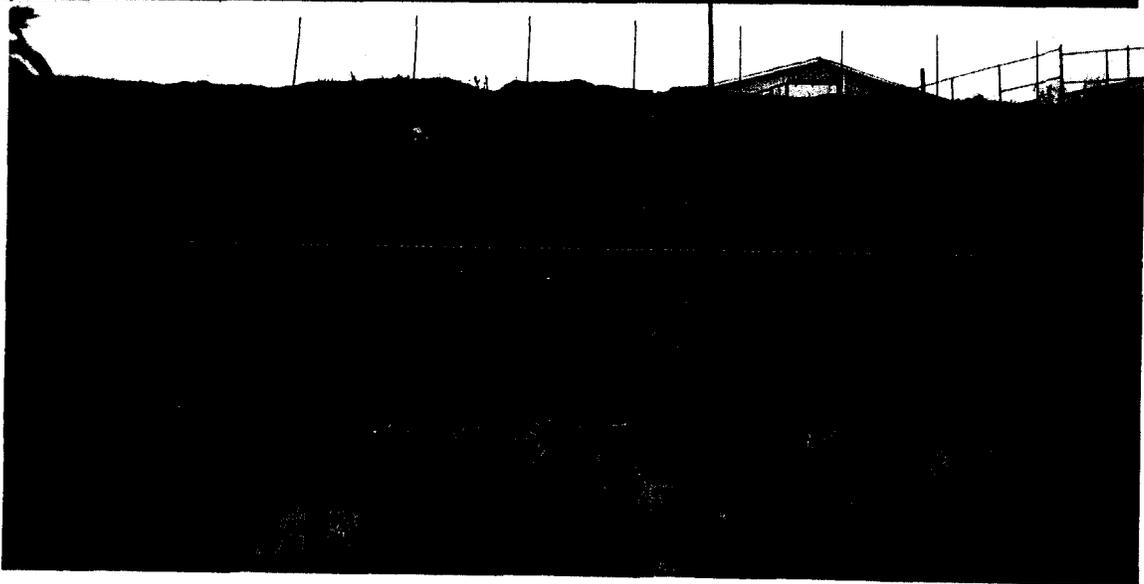
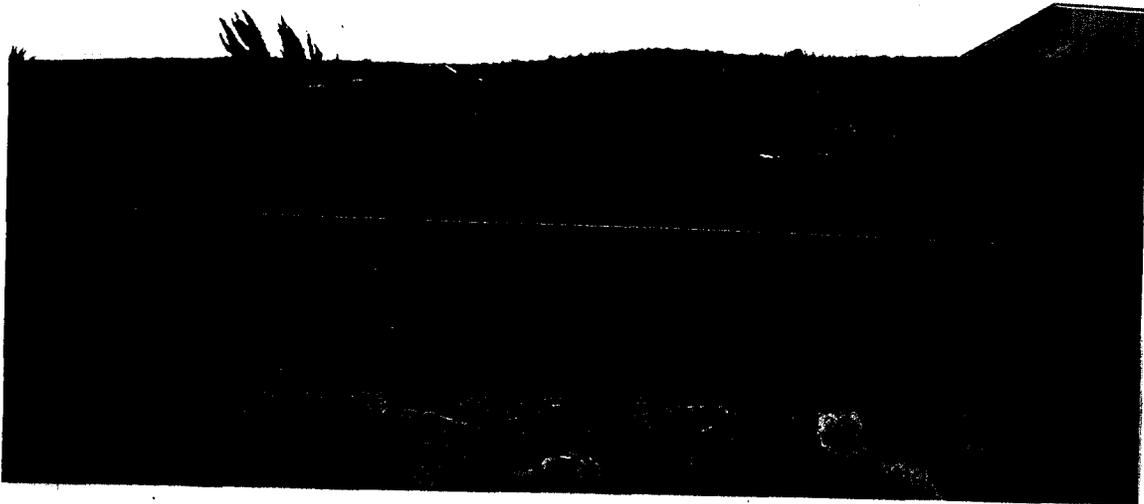
- LOOKING NORTH
- NARROW
- CURVY
- VIEW OBSCURED
- NO SIDEWALK
- NO PARKING SOUTH
OF MAIN ST. ENTRANCE
- UPHILL

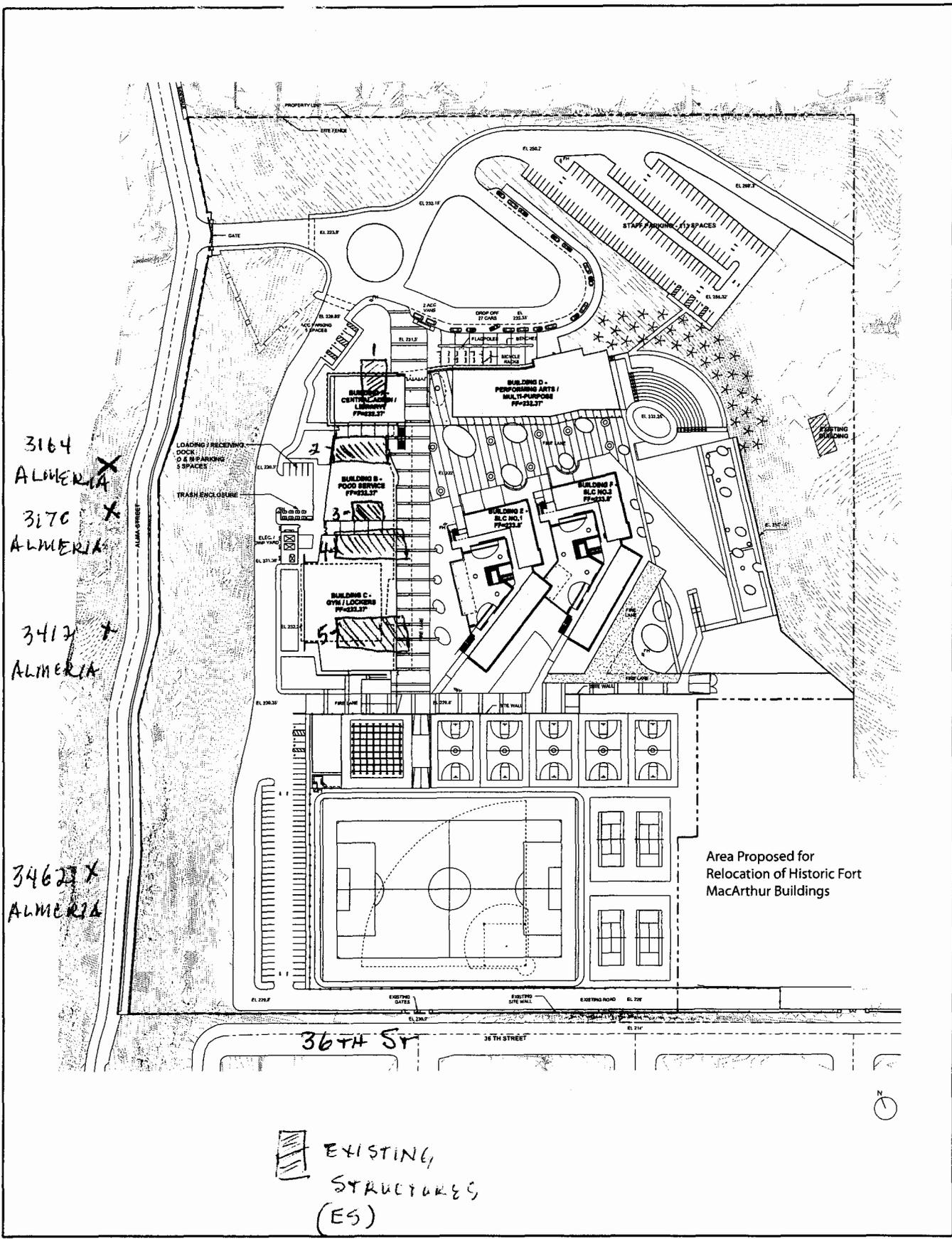


ALMA STREET

- 'VIEW SOUTHBOUND
- 'NARROW, CURVY
- 'NO PARKING
- 'NO SIDEWALK
- 'VIEW OBSCURED
- 'DOWNHILL

VIEW
FROM
RESIDENCE
AT
ALMA'S
MAIN
STREET
ENTRANCE





SOURCE: CO Architects



Figure 2-4
 Conceptual Site Plan
 Proposed South Region High School No. 15

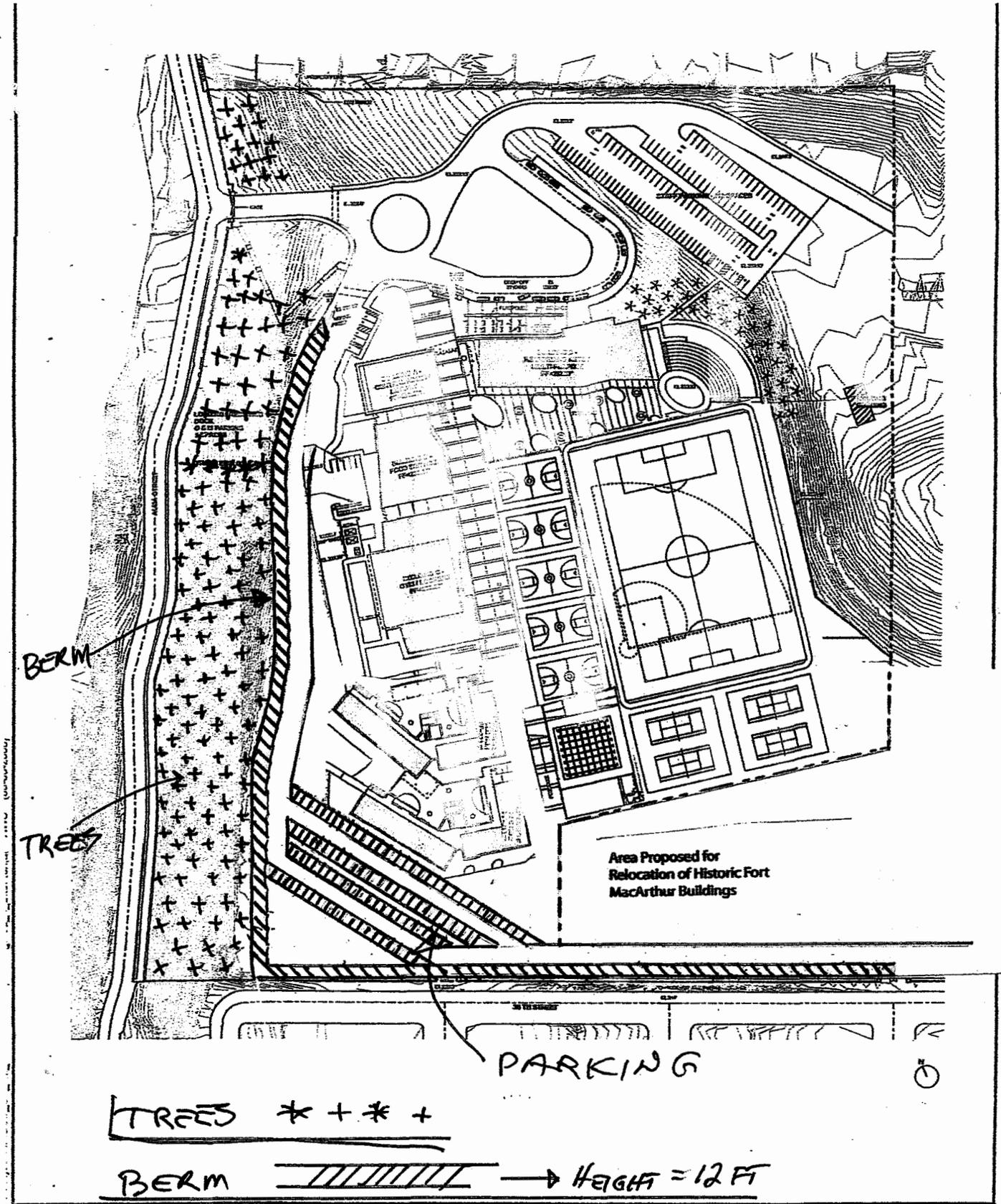


Figure 2.4
Conceptual Site Plan
Proposed South Region High School No. 15
WITH MITIGATION FOR NOISE
& PARKING

References Regarding the Health Effects of Diesel Exhaust Air Pollution
July 25, 2003

1. Health Assessment Document For Diesel Engine Exhaust (United States Environmental Protection Agency, EPA/600/8-90/057F, May 2002).
2. Staff Report: Public Hearing to Consider Amendments to the Ambient Air Quality Standards for Particulate Matter and Sulfates. (State of California, California Environmental Protection Agency, Air Resources Board) Staff Report: Initial Statement of Reasons for Proposed Rule Making. Release Date: May 3, 2002.
3. Selected Key Studies on Particulate Matter in Health: 1997-2001 American Lung Association, Updated March 5, 2001.
4. Findings of the Scientific Review Panel on "THE REPORT ON DIESEL EXHAUST" as adopted at the Panel's April 22, 1998 Meeting.
5. "Lung Cancer, Cardiopulmonary Mortality, and Long Term Exposure to Particulate Fine Matter Air Pollution" Journal of the American Medical Association, March 6th, 2002, Volume 287, No. 9.
6. "Occupational Exposure to Diesel Exhaust and Lung Cancer: A Meta-Analysis" American Journal of Public Health, 1999; 89:1009-1017.
7. "The Concentration-Response Relation between PM_{2.5} and Daily Deaths" Environmental Health Perspectives, Volume 110, Number 10, October 2002. (Harvard School of Public Health).
8. "Increased Particulate Air Pollution and the Triggering of Myocardial Infarction." Circulation, June 12, 2001. (Harvard School of Public Health and the American Heart Association).
9. "The Effects of Air Pollution on Infant Mortality Appears Specific for Respiratory Causes in the Post neonatal Period." Epidemiology, November 1999, Volume 10, Number 6.
10. Editorial "Air Pollution Kills Babies..." Epidemiology, November 1999, Volume 10, number 6.
11. "Ambient Air Pollution and the Risks of Birth Defects in Southern California" American Journal of Epidemiology, Volume 155, Number 1, 2002. (Research done at UCLA).

12. "Association between Air Pollution and Intrauterine Mortality in Sao Paulo, Brazil" *Environmental Health Perspectives*, Volume 106, Number 6, June 1998.
13. "Respiratory Effects of Relocating to Areas of Differing Air Pollution Levels" *American Journal of Respiratory and Critical Care Medicine*, Volume 164, pp2067-2072, 2001. (Research done at USC)
14. "The Effects of Ambient Air Pollution on School Absenteeism due to Respiratory Illnesses" *Epidemiology*, January 2001, Volume 12, Number 1. (Research done at USC).
15. "Air Pollution and Infant Mortality in Mexico City" *Epidemiology*, March 1999, Volume 10, Number 2.
16. "Air Pollution and Bronchitic Symptoms in Southern California Children with Asthma" *Environmental health Perspectives*, Volume 107, Number 9, September 1999.
17. "Association between Air Pollution and Lung Function Growth in Southern California Children" *American Journal of Respiratory and Critical Care Medicine*, Volume 162, 2000.
18. "Global Increases in Allergic Respiratory Disease: The Possible Role of Diesel Exhaust Particles" *Annals of Allergy, Asthma and Immunology*, Volume 77, October 1996. (Research done at UCLA).
19. "Association of very Low Birth Weight with Exposures to Environmental Sulfur Dioxide and Total Suspended Particulates" *American Journal of Epidemiology*, Volume 151, Number 6, 2000.
20. "From Asthma to AirBeat: Community driven monitoring of fine particulates and black carbon in Roxbury, Massachusetts." *Environmental Health Perspectives*, April 2002, Volume 110, Supplement 2: 297-301.
21. "Inhalation of Fine Particulate Air Pollution and Ozone causes Acute Arterial Vasoconstriction in Healthy Adults" *Circulation*, 2002, April 2; 105 (13): 1534-1536.
22. "A Three-Way Link may exist among Air Pollution, Allergy Sensitization and Reactivity, and Asthma" *Allergy* 1998; 53:335-45. (Cited in "Update in Allergy and Immunology", *Annals of Internal Medicine*, 1 February, 2000, Volume 132, Number 3.

HEALTH EFFECTS OF DIESEL EXHAUST AIR POLLUTION

August 28, 2003

Document prepared by the Environmental Subcommittee/Air Quality Group to be forwarded to the Board of Harbor Commissioners (BOHC) via PCAC

Subject: Committees Findings Regarding Health Effects of Diesel Exhaust Air Pollution; with Concern for Port Activity Related Sources

BACKGROUND: Since its inception the Environmental Subcommittee has been considering the issue of the multiple health effects that have been associated with diesel exhaust air pollution. Experts hired by the Committee, including Professor Avol, Mr. Howekamp, and experts from ARB and AQMD have frequently provided input. These experts also found data for the committee's review from sources they had available. Dr. John G. Miller, an Environmental Sub-committee member and PCAC member cited and provided multiple references from the medical, epidemiologic and scientific literature on this topic. Members of the public have expressed concerns at many committee meetings.

The committee has learned that the Health Risk Assessment Study (HRA) to be completed by consultants hired by the POLA, as one of the Seven Studies mandated by the BOHC, is not scheduled to begin until possibly January 2004, depending on when the (as yet incomplete) Air Emissions Inventory is finished. The completion date for the HRA is currently estimated to be late 2004/early 2005.

Environmental Sub-committee members have heard extensive input from the public requesting no further delay in conveying what it has found to date to the BOHC. This input came both at meetings and in the community. The committee finds no reason for further delay in revealing its findings to date.

The committee notes that Port-related activities, including those that occur off Port property but as a result of Port operations, have been identified by the South Coast AQMD as the largest single unregulated contributor to area-wide air pollution.

Port operations (shipping, loading/unloading, and transport of product) require the use of significant amounts of fuel. Currently most of the trucking, locomotive, and off-road yard operations in and supporting the Port use diesel fuel. The combustion of diesel fuel creates high concentrations of very small particles (numerically, over 90% are less than 1 micron in diameter) and nitrogen oxides. Regional air studies have demonstrated that Port-related emissions are transported widely in the air across the South Coast Air Basin, from the harbor area to Riverside/San Bernardino and beyond. These pollutants have been associated directly (through direct exposure by breathing these pollutants from the air) and indirectly (through participation in photochemical reactions in the air, and breathing the products of these reactions, such as ozone) with a number of health effects.

The Sub-committee has learned that some of these health effects occur even when concentrations of particulates are just one quarter of the Federal limit for outdoor air.

Summary of Health Effects that have been related to Diesel Exhaust Air Pollution as identified and brought to the committee's attention:

1. Prenatal and Perinatal effects
 - A. Intrauterine growth retardation
 - B. Elevated incidence of low birth weight infants
 - C. Increased incidence of spontaneous miscarriage
 - D. Increased incidence of respiratory cause of deaths in newborns
 - E. Elevated incidence of serious birth defects
 - F. Increases in sudden infant death syndrome (SIDS)

2. Childhood effects
 - A. Diminished lung growth in children (with unknown long term effects on the individual)
 - B. Development of asthma in children involved in active sports
 - C. Exacerbations of existing asthma
 - D. Elevation of incidence of asthma in children and teenagers. (an ongoing worldwide phenomenon)
 - E. Increases in incidence of bronchitic symptoms
 - F. Loss of days from school attendance due to respiratory symptoms
 - G. Potentiation (enhancement) of allergic effects of known allergens such as ragweed pollen when individual is exposed to diesel particles and the allergen concomitantly.

3. Adulthood
 - A. Elevated incidence of lung cancer in a linear relationship with progressive increases in fine particle (Pm 2.5) air pollution (The category Pm 2.5 includes the particles less than 1 micron in size.)
 - B. Elevated incidence of myocardial infarctions (heart attacks)
 - C. Elevated incidence of mortality from cardiovascular causes (heart attacks and strokes)
 - D. Triggering of myocardial infarctions associated with spikes in Pm 2.5
 - E. Elevation of cardiopulmonary deaths in a linear relationship with increases in Pm 2.5
 - F. Significant elevations in "all cause mortality" associated with increases in Pm2.5
 - G. Increased incidence of bronchitic symptoms
 - H. Chronic obstructive pulmonary disease (COPD): increased incidence, prevalence, and exacerbations of existing disease.
 - I. Fatal exacerbations of COPD
 - J. Exacerbations of asthma leading to time off work, emergency room visits and hospitalizations

- K. Approximately 1.5 times elevation in the smoking adjusted incidence of lung cancer in workers occupationally exposed to diesel exhaust versus the smoking adjusted relative risk baseline incidence of lung cancer in similar non-exposed populations.
- L. Chronic exposure to particulate pollution shortens lives by one to three years
- M. Higher concentrations of particulate air pollution has been linked to low heart rate variability, a risk factor for heart attacks. Association is stronger for people with pre-existing cardiovascular conditions.
- N. Mitochondrial damage in cells. (All age groups)
- O. Airway inflammatory changes (all age groups)
- P. Damage to and death of alveolar and airway macrophages,(all age groups)

This is a brief overview of an extensive and growing body of knowledge. These findings were developed through many avenues of research including but not limited to: epidemiologic studies, clinical studies-retrospective and prospective, autopsy studies, animal studies, cellular biology studies, and Government agency investigations. There has been worldwide scientific participation in research on the links between diesel exhaust air pollution and human health.

This body of knowledge is constantly evolving, with many new pieces of information having been published or brought to light since the inception of Environmental Committee Subcommittee/Air Quality Group. The committee notes that as this an evolving body of knowledge, in many areas further studies are needed.

The Committee finds sufficient evidence to warrant immediate aggressive action by POLA and its tenants to reduce the measurable levels of local and Air Basin wide diesel exhaust air pollution due to Port related activities.

Richard Havenick
Chairman, Air Quality Group

1. The average wind velocity is listed on page 6-3 as an average 6 mph. This does not accurately reflect the wind conditions in this area. It is a daily occurrence that the winds reach 20 mph for several hours. This will affect how far the toxins are carried and for how long. This must be taken into consideration when determining a Remedial Action Workplan. It is anticipated that if this project is undertaken, the neighbors will need to be vigilant in monitoring the appropriateness with which it is carried out. To date, our experience with LAUSD causes a lack of confidence in their ability to guide their contractors to carry out instructions in the appropriate, legal and mandated manner.

Data giving recent history of wind speeds is attached to this response. It is from the Marine Exchange which is located on the property as well as from Cabrillo Beach.

2. Further testing should be done in all sites in a grid-like fashion. Further lateral and peripheral testing should be done to determine the extent of the toxic substances. Reference is made to the maps attached to this response. Map #1 refers to the areas where samples were procured. Map #2 refers to where LAUSD currently plans to place their structures. Map #3 superimposes Map #1 onto Map #2.

In viewing Map #3, one can see that LAUSD plans to build several buildings in what we have labeled the "sunken area" or cesspit. Joe Janesic, the historian for Fort MacArthur has indicated that this area was used for disposal and then backfilled. However, there are very few sites tested in this area.

Further, in our response to the DEIR, we will be asking for mitigation efforts to cover up the blight these buildings will have. Our proposed mitigation will be to install significant landscaping along the borders of the school. In particular, we will propose mitigation of the visual blight on Alma by landscaping the whole hillside along Alma. We will also propose as mitigation a soundproof wall to be built on school property borders on Alma, 30th and 37th Streets to contain the noise that will be generated by school and sports activities. We ask that more testing be done in a grid like fashion to include these areas.

The proposed layout of the school and building locations has changed during the last several months. We will be suggesting during the CEQA process that the buildings be relocated, essentially flipped, in order to spare the quiet residential neighborhood the noises that will be generated due to this school. We ask that more testing be done in a grid like fashion to include all areas in the event that the location of the buildings are changed.

3. Generally, all investigations of the site are included in the PEA. Not included in this PEA is the following:
 - a. Tetra Tech, Inc.'s investigation conducted in June 1993 of the Target Range Road Landfill
 - b. Woodward Clyde Federal Services testing of the Target Range Road Landfill reported in August 1994.
 - c. Woodward Clyde Investigation of the Target Range Road Landfill reported in 1995.

References to these investigations were found in ENCON's August, 2008 reports to Angel's Gate Cultural Center which is located on that site. Their summary of these investigations is attached as an exhibit to this response.

4. The community is very interested in commenting on any Remedial Action Workplans. We would appreciate a community meeting in the Palisades Area to explain what the testing has found and what effect the toxins have on the neighbors and our children if they should attend the school. We would also request a community meeting to explain any proposed Remedial Action Workplan in order to make appropriate public comment. Because the community's interest is widespread, we suggest the meeting occur at White Point School auditorium.

4. Off-site impacts to/from surrounding property have not been adequately addressed. For example: water drainage to the ocean during cleanup and constructions of this site: Alma flows directly into the ocean. The Stormwater Program has not been addressed in 10 years. Concerns about run-off to and from Point Fermin Outdoor Education Center and Angel's Gate Cultural Center and Parks and Recreation have not been addressed.
5. We are concerned with the elevated levels of lead found during the testing.
6. TPH is found in high amounts. Essentially it is waste oil and should be removed.
7. We are concerned that the equipment used to remediate the toxins at this site will attempt to use Alma Street. This street goes through residential neighborhoods. It is also very narrow and dangerous.
8. We request that at the conclusion of SSI testing, the PEA be redrafted and recirculated for public comment. We request a second review following the release of the results of the SSI since this involves the "hottest" items.
9. The community will insist on receiving the DTSC community survey for our comments during this period
10. We are concerned about the air monitoring that should occur if a Remedial Action Workplan takes place. We are concerned about the perimeter monitoring as well,

particular in light of the wind velocity in the area. We are concerned that the appropriate permits from the Air Board will be pulled. We are concerned with the responsiveness of LAUSD and DTSC to our concerns before remedial action begins and during the excavation, etc.

Highlights from Google Tour: The Curve at 36th St. and Emily



Red Truck seen over correcting the curve is heading toward potential oncoming traffic

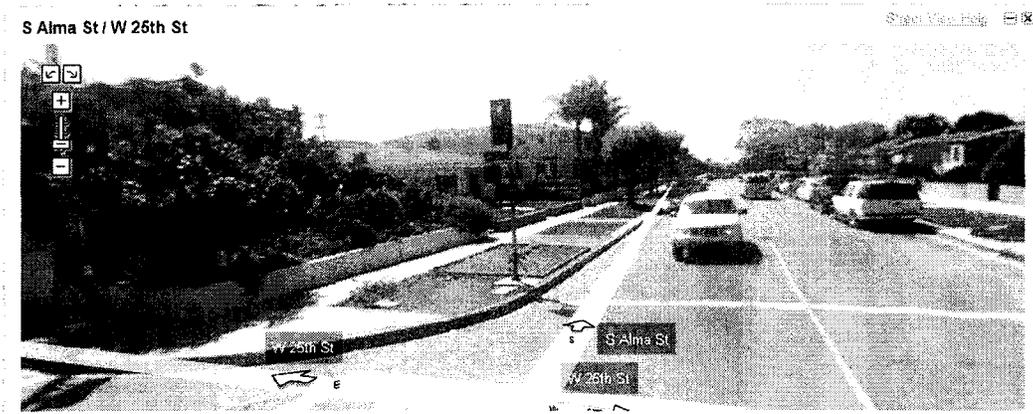


View of 36th St. curve turning left on to Emily St. You can see the shadow of the red truck at the bottom cutting the curve too far to the left.

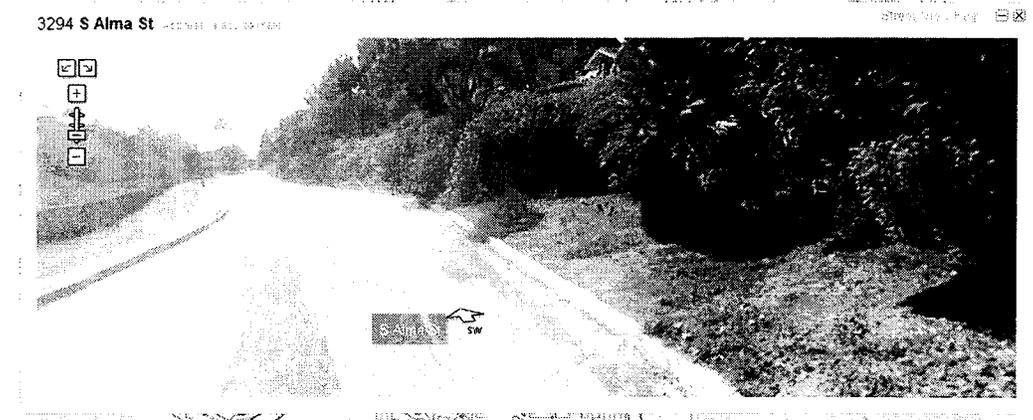


View of locked entrance on 36th just one block from Emily St. This is the stretch where numerous recreational/sports facilities are to be built in the current SRHS 15 Plan.

Highlights from Google Tour: The Trip down Alma St.



The corner of 25th and Alma. Look how narrow the street is with cars parked on both sides.



This is how hilly and curvy it is just south of the proposed entrance. This stretch down to 37th St. is a favorite of skateboarders and bicycle riders.



This picture of Alma's sudden end at 37th St. doesn't show the damage done by the latest of many out of control cars to smash into these walls. (OVER)