April 2021 | Final Environmental Impact Report
State Clearinghouse No. 2019071040

WEDGEWORTH K-8 SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT

for Hacienda La Puente Unified School District

Prepared for:

Hacienda La Puente Unified School District
Contact: Joel Duarte, Director of Purchasing & Warehouse
15959 East Gale Avenue
City of Industry, California 91716-0002
626.933.8701

Prepared by:

PlaceWorks
Contact: Dwayne Mears, AICP, Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

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1. Introduction

1.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §§ 21000 et seq.) and CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

According to the CEQA Guidelines, Section 15132, the FEIR shall consist of:

(a) The Draft Environmental Impact Report (DEIR) or a revision of the Draft;

(b) Comments and recommendations received on the DEIR either verbatim or in summary;

(c) A list of persons, organizations, and public agencies comments on the DEIR;

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and

(e) Any other information added by the Lead Agency.

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. Pursuant to Section 15088.5(a) of the CEQA Guidelines, "significant new information" requiring recirculation include, for example, a disclosure showing that 1) a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented (Section 15088.5[a][1]); 2) a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance (Section 15088.5[a][2]).; 3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it (Section 15088.5[a][3]); and 4) the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043) (Section 15088.5[a][4]).

When the original Draft EIR was released on December 5, 2020, replacement field locations were not selected by the District to mitigate significant impacts to recreation resulting from displacing four ballfields from the project site, and the DEIR concluded that recreation impacts were significant and unavoidable. The District subsequently identified two locations for replacement fields:

- Kwis Elementary School (1925 Kwis Avenue in Hacienda Heights). Replacement of one large and one small ballfield, both with sports lighting.

- Cedarlane Academy (16333 Cedarlane Drive in Hacienda Heights). Replacement of two small ballfields without lights.

Therefore, the District prepared and recirculated the Draft EIR to evaluate environmental impacts that may result from the development and operation of the replacement ballfields as mitigation for impacts to recreation facilities pursuant to the CEQA Guidelines Section 15088.5(a)(1). The analysis is limited to environmental topics that could potentially have significant impact.

This document contains responses to comments received on the originally circulated DEIR for the proposed project from the public review period that began December 5, 2019, and closed January 21, 2020, and the comments received on the Recirculated DEIR (RDEIR) from the review period that began February 19, 2021, and closed April 5, 2021. This document has been prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the Lead Agency, the Hacienda La Puente Unified School District (District or HLPUSD). This document and the circulated DEIR, RDEIR, and Mitigation Monitoring and Reporting Program (MMRP) comprise the FEIR, in accordance with CEQA Guidelines, Section 15132.

1.2 FORMAT OF THE FEIR

This document is organized as follows:

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

Section 2, Response to Comments to the First Circulated DEIR. This section provides a list of agencies and interested persons commenting on the DEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (A1 through A7 for letters received from agencies and organizations, and R1 through R26 for letters received from residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 3, Response to Comments to the Recirculated DEIR. This section provides a list of agencies and interested persons commenting on the RDEIR; copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number (AA1 through AA3 for letters received from agencies and organizations, and RR1 through RR30 for letters received from residents). Individual comments have been numbered for each letter and the letter is followed by responses with references to the corresponding comment number.

Section 4, Revisions to the Draft EIR. This section contains revisions to the DEIR text and figures as a result of the comments received by agencies and interested persons as described in Section 2 and/or errors and omissions discovered subsequent to release of the DEIR for public review.

Section 5, Revisions to the Recirculated DEIR. This section contains revisions to the RDEIR text and figures as a result of the comments received by agencies and interested persons as described in Sections 3 and/or errors and omissions discovered subsequent to release of the RDEIR for public review.

The responses to comments contain material and revisions that will be added to the text of the FEIR. HLPUSD staff has reviewed this material and determined that none of this material constitutes the type of significant new information that requires recirculation of the EIR for further public comment under CEQA Guidelines Section 15088.5. None of this new material indicates that the project will result in a significant new environmental impact not previously disclosed in the DEIR and the RDEIR. Additionally, none of this material indicates that there would be a substantial increase in the severity of a previously identified environmental impact that will not be mitigated, or that there would be any of the other circumstances requiring recirculation described in Section 15088.5.

1.3 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (a) outlines parameters for submitting comments, and reminds persons and public agencies that the focus of review and comment of EIRs should be "on the sufficiency of the document in identifying and analyzing possible impacts on the environment and ways in which significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible. …CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR."

CEQA Guidelines Section 15204 (c) further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence." Section 15204 (d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

In accordance with CEQA, Public Resources Code Section 21092.5, copies of the written responses to public agencies will be forwarded to those agencies at least 10 days prior to certifying the environmental impact report. The responses will be forwarded with copies of this FEIR, as permitted by CEQA, and will conform to the legal standards established for response to comments on DEIRs.

1. Introduction

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2. Response to Comments on the DEIR

Section 15088 of the CEQA Guidelines requires the Lead Agency (HLPUSD) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and prepare written responses.

This section provides all written responses received on the DEIR and the HLPUSD's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the DEIR are excerpted in this document, the sections are shown indented. Changes to the DEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the DEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies and Organizations			
A1	County of Los Angeles Fire Department	January 7, 2020	2-8
A2	California Department of Transportation	January 3, 2020	2-11
A3	County of Los Angeles Department of Parks and Recreation	January 15, 2020	2-15
A4	County of Los Angeles Public Works Department	January 21, 2020	2-19
A5	Sanitation Districts of Los Angeles County	January 21, 2020	2-24
A6	Rowland Water District	January 7, 2020	2-27
A7	South Coast Air Quality Management District	January 21, 2020	2-40
Residents			
R1	Blanco, Jolene	January 23, 2020	2-53
R2	Chang, Vickie	January 19, 2020	2-60
R3	Chang, Yuchi	January 17, 2020	2-62
R4	Chen, Angeline	January 18, 2020	2-64
R5	Chen, Dan	January 22, 2020	2-66
R6	Cho, YeeKi	January 17, 2020	2-68
R7	Don, Zona	January 17, 2020	2-70
R8	Fan, Derick	January 21, 2020	2-73
R9	Fan, Ivory	January 17, 2020	2-76
R10	Greenup, Cindy	January 21, 2020	2-78
R11	Jennie	January 21, 2020	2-81
R12	Jenny	January 21, 2020	2-85
R13a	Kovall, Sue	January 21, 2020	2-89
R14	Kuo, Alex	January 22, 2020	2-94
R15	Kuo, Vivian	January 20, 2020	2-97

2. Response to Comments from the DEIR

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
R16	Lai, Ming	January 17, 2020	2-104
R17	Lai, Ming_2	January 20, 2020	2-109
R18	Lee, Anita	January 17, 2020	2-112
R19	Li, Joann	January 17, 2020	2-114
R20	Li, Mandy	January 20, 2020	2-116
R21	Navar, Gabriela	January 21, 2020	2-118
R22	Quinones, Adriana	January 21, 2020	2-122
R23	Salazar, Christine	January 21, 2020	2-125
R24	Wong, Ben	January 17, 2020	2-128
R25	Yu, Hazel Carlo	January 21, 2020	2-130
R26	Yu, Jessie	January 18, 2020	2-132
R27	Kovall, Sue	January 21, 2020	2-137

2.1 GOVERNMENT AGENCIES (DEIR COMMENTS)

2. Response to Comments from the DEIR

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LETTER A1 – County of Los Angeles Fire Department (3 page[s])

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

"Proud Protectors of Life, Property, and the Environment"

BOARD OF SUPERVISC A1
HILDA L. SOLIS
FIRST DISTRICT
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THIRD DISTRICT
JANICE HAHN
FOURTH DISTRICT
KATHRYN BARGER
FIFTH DISTRICT

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

January 7, 2020

Mark Hansberger, Director
Hacienda La Puente Unified School District
Facilities Projects
15959 East Gale Avenue
City of Industry, CA 91716

Dear Mr. Hansberger:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "WEDGEWORTH K-8 SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT," IS PROPOSING TO REDEVELOP A 20-ACRE PROJECT SITE IN PHASES TO CONSTRUCT A NEW EXPANDED K-8 SCHOOL SERVIING 1,200 STUDENTS ON 10 ACRES IN PHASE 1 AND UP TO 160 RESIDENTIAL UNITS IN PHASE 2, LOCATED AT 16949 WEDGEWORTH DRIVE, HACIENDA HEIGHTS, FFER 2019007250

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments. A1-1

For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

LAND DEVELOPMENT UNIT:

1. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4. A1-2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CALABASAS	EL MONTE	INDUSTRY	LAWNDALE	PARAMOUNT	SIGNAL HILL
ARTESIA	CARSON	GARDENA	INGLEWOOD	LOMITA	PICO RIVERA	SOUTH EL MONTE
AZUSA	CERRITOS	GLENDORA	IRWINDALE	LYNWOOD	POMONA	SOUTH GATE
BALDWIN PARK	CLAREMONT	HAWAIIAN GARDENS	LA CANADA-FLINTRIDGE	MALIBU	RANCHO PALOS VERDES	TEMPLE CITY
BELL	COMMERCE	HAWTHORNE	LA HABRA	MAYWOOD	ROLLING HILLS	WALNUT
BELL GARDENS	COVINA	HERMOSA BEACH	LA MIRADA	NORWALK	ROLLING HILLS ESTATES	WEST HOLLYWOOD
BELLFLOWER	CUDAHY	HIDDEN HILLS	LA PUENTE	PALMDALE	ROSEMEAD	WESTLAKE VILLAGE
BRADBURY	DIAMOND BAR	HUNTINGTON PARK	LAKEWOOD	PALOS VERDES ESTATES	SAN DIMAS	WHITTIER
	DUARTE		LANCASTER		SANTA CLARITA	

2. Response to Comments from the DEIR

Mark Hansberger, Director
January 7, 2020
Page 2

2. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code. A1-2

3. The required 20-foot wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.

4. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.

5. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.

6. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. (Fire Code 503.2.4) Indicate the centerline, inside, and outside turning radii for each change in direction on the site plan.

7. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

8. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1.

9. All required PUBLIC fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.

10. All required PUBLIC fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.

11. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.

12. Provide a Form 196 signed and completed by the local water purveyor.

13. Show all existing public fire hydrants to within 300' of all property lines.

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

Mark Hansberger, Director
January 7, 2020
Page 3

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed. A1-3

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.
The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division of the Los Angeles County Fire Department has no comments or requirements for the project at this time. A1-4

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

MICHAEL Y. TAKESHITA, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

MYT:ac

2. Response to Comments from the DEIR

A1. Response to Comments from Michael Y. Takeshita, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, dated January 7, 2020.

A1-1 The Planning Division indicated that they have no comment.

A1-2 The comments do not address the adequacy of the DEIR; instead, the comments list specific standards and requirements the proposed project must follow. Any residential development included as part of Phase 2 of this project will be developed in accordance with the listed standards. No further response is required.

A1-3 The comment states that the statutory responsibilities of the Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance, and that potential impacts in these areas should be addressed. Potential impacts to listed areas have been addressed. Impacts related to erosion control and watershed management are discussed in the DEIR Sections 5.3, *Geology and Soils*, and 5.5, *Hydrology and Water Quality*; rare and endangered species and vegetation impacts are discussed in the Initial Study Section 3.4, *Biological Resources*; fuel modification for Very High Fire Hazard Severity Zones is discussed in the Initial Study Section 3.20, *Wildfire*, and archaeological and cultural resources are discussed in the Initial Study Section 3.5, *Cultural Resources*.

The comment indicates that if oak trees exist on-site, a permit shall be obtained per the Los Angeles County Oak Tree Ordinance. As stated in the Initial Study Section 3.4(e) (Appendix A to the DEIR), the project site does not have any oak trees, and development of the proposed project would not conflict with any terms of the Oak Tree Permits, Los Angeles County Code, Sections 22.56.2050 et seq. No further response is necessary.

A1-4 The Health Hazardous Materials Division of the Los Angeles County Fire Department indicated that they have no comment.

LETTER A2 – California Department of Transportation (2 page[s])

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, **A2**

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

JAN 13 2020
RECEIVED

Making Conservation a California Way of Life.

January 3, 2020

Mr. Mark Hansberger
Hacienda La Puente Unified School District
15959 East Gale Avenue
Industry, CA 91745

RE: Wedgeworth K-8 School and Residential Development – Draft Environmental Impact Report (DEIR)
GTS # 07-LA-2019-02949
SCH # 2019071040
Vic. LA-60/PM: 17.673

Dear Mr. Mark Hansberger:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop the existing Wedgeworth Elementary School serving 600 students in grades K-5 to a new K-8 school serving 1,200 students. The existing elementary school site encompasses 20 acres. The Hacienda La Puente Unified School District would develop a 10-acre portion of the site as a K-8 school and allow development of up to 160 residential units on the remaining 10-acre portion by selling it to a residential developer. The Hacienda La Puente Unified School District (District) is the lead agency under the California Environmental Quality Act (CEQA).

The nearest State facility to the proposed project is State Route 60 (SR-60), which is located adjacent to the project. From reviewing the DEIR, Caltrans does not expect project approval to result in a direct adverse and significant impact to the existing State transportation facilities. A2-1

The following information is included for your consideration.

As mentioned in our previous letter responding to the Notice of Preparation for this DEIR, the mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Therefore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. We encourage the Lead Agency to evaluate the potential of the Transportation Demand Management (TDM) strategies listed in our previous letter to meet these goals. For additional TDM options that can reduce VMT, please refer to: A2-2

- *Quantifying Greenhouse Gas Mitigation Measures* by the California Air Pollution Control Officers Association (CAPCOA), available at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at: https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm

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

2. Response to Comments from the DEIR

As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

Finally, storm water run-off is a sensitive issue for Los Angeles county. Please be mindful that the project needs to be designed to discharge clean run-off water. A2-3

If you have any questions regarding these comments, please contact project coordinator Emily Gibson, at Emily.Gibson@dot.ca.gov and refer to GTS# 07-LA-2019-02949.

Sincerely,

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

A2. Response to Comments Miya Edmonson, IGR/CEQA Branch Chief, Department of Transportation, dated January 3, 2020.

A2-1 The comment indicates that the nearest state facility to the project site is State Route 60 (SR-60), and the Department of Transportation (Caltrans) does not expect the proposed project to result in a direct adverse impact to the existing Caltrans facilities. No further response is necessary.

A2-2 The comment states that Caltrans encourages the lead agency to reduce vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions and facilitate a high level of non-motorized travel and transit use. The comments also indicate that Caltrans encourages the lead agency to evaluate the transportation demand management (TDM) strategies. Section 5.8, Transportation, of the DEIR was recirculated for public review and includes VMT analysis per SB 743. The RDEIR determined that the Phase 2 development (residential portion of the proposed project) would result in significant and unavoidable VMT impacts, while the Phase 1, K-8 school portion of the proposed project would result in less than significant impact. The residential portion of the development would be required to consider TDM strategies at the time of development application to the County of Los Angeles.

A2-3 The comment indicates that stormwater runoff is a sensitive issue for the County, and the proposed project needs to be designed to discharge clean runoff water. As discussed in DEIR Section 5.5, *Hydrology and Water Quality*, the proposed project would be designed to ensure that no increase in runoff volume and amount of pollutants would flow to the County's storm water drainage system. No specific comments have been provided; no further response is necessary.

2. Response to Comments from the DEIR

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LETTER A3 – County of Los Angeles Department of Parks and Recreation (2 pages

A3

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
John Wicker, Director — Norma E. Garcia, Chief Deputy Director

January 15, 2020

Mr. Mark Hansberger
Director, Facilities Projects
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, CA 917716

Dear Mr. Hansberger:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE WEDGEWORTH SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the Wedgeworth School and Residential Development Project (proposed project). The Los Angeles County Department of Parks and Recreation (DPR) has reviewed the DEIR and offers the following comments:

Page 5.7-4, Recreation

DPR operates and maintains several County parks with baseball fields within a five-mile radius of the project site, including William Steinmetz Park, Allen Martin Park, San Angelo Park, Rimgrove Park, Pathfinder Community Regional Park, and Sunshine Park. A3-1

The proposed elimination of four baseball fields at Wedgeworth School as a part of the proposed project would result in an increased use of other baseball fields nearby as replacement facility by the existing little league. The DEIR states that if the replacement baseball field is selected among the County facilities, "the potential impacts to County facilities would be considered significant."

In order to address this significant impact, the District should coordinate with DPR prior to closing of the existing fields to determine the most appropriate replacement facility. Accordingly, mitigation measure REC-1 should be modified as follows:

REC-1: The Hacienda La Puente Unified School District shall work with local baseball organization in identifying a replacement baseball field and coordinate with the Los Angeles County Department of Parks and Recreation prior to closing the existing fields.

Planning and Development Agency • 1000 S. Fremont Avenue, Unit #40, Alhambra, CA 91803 • (626) 588-5322

2. Response to Comments from the DEIR

Also, the DEIR mentions the County's Local Park Space Obligation (Quimby) requirements for residential subdivisions. It should clarify that the Quimby in-lieu fees collected are to mitigate the recreational impacts from the residential component of the proposed project, not for the displacement of the baseball fields. As suggested in the DEIR, the assessment of separate maintenance and/or usage fees would be needed to reduce impacts from the additional demands on County facilities should they be used to accommodate a replacement field. A3-2

Thank you for including this Department in the review of this document. Should you have any questions or require additional information, please feel free to contact Clement Lau, Departmental Facilities Planner, of my staff at (626) 588-5301 or clau@parks.lacounty.gov

Sincerely,

Alina Bokde
Deputy Director

AB:CL:JY:jy

c: Parks and Recreation (C. Lau, J. Yom)

A3. Response to Comments from Alina Bokde, Deputy Director, County of Los Angeles Department of Parks and Recreation, dated January 15, 2020.

A3-1 The comment indicates that the District should coordinate with the Department of Parks and Recreation (DPR) prior to closing of the existing fields to determine the most appropriate replacement facility, and the Mitigation Measure REC-1 should be modified.

Section 5.7, Recreation, of the DEIR has been modified and was recirculated for review. The District has identified two District-owned sites to replace four baseball fields to be displaced, and impacts have been reduced a less than significant level. No further response is necessary.

A3-2 Section 5.7, Recreation, of the DEIR has been modified and was recirculated for review. The Recirculated DEIR states that the in-lieu fee collection is for the residential development portion of the proposed project. No further response is necessary.

2. Response to Comments from the DEIR

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LETTER A4 – County of Los Angeles Public Works Department (2 pages)

A4

From: Jose Suarez <JSUAREZ@dpw.lacounty.gov>
Sent: Tuesday, January 21, 2020 5:19 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Cc: Toan Duong <TDUONG@dpw.lacounty.gov>; Ed Gerlits <EGERLITS@dpw.lacounty.gov>; Jose Cruz <JoCruz@dpw.lacounty.gov>
Subject: Wedgeworth K-8 School DEIR

Mr. Mark Hansberger
Hacienda La Puente Unified School District
Director, Facilities Project
15959 East Gale Avenue
City of Industry, California 91716-0002

Dear Mr. Hansberger,

RPPL2019007356 (DEIR)
WEDGEWORTH K-8 SCHOOL
COUNTY UNINCORPORATED COMMUNITY OF HACIENDA HEIGHTS

Thank you for the opportunity to review the subject projects Draft Environmental Impact Report (DEIR). Hacienda La Puente Unified School District is proposing to redevelop a 20-acre project site in two phases. Phase one consists of construction of a K-8 school on 10 acres of land. Phase two consists of selling the remaining 10 acres to a private developer for the construction of residential units.

For specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first
referenced then the excerpt from the document is copied within quotations using the following nomenclature:

Deletions are represented by a ~~strikethrough~~.
Additions are represented by *italics* along with an underline.
Revisions are represented by a combination of the above.

1. **2. Introduction, 2.2 Notice of Preparation and Initial Study, Pg. 2-4 to 5**

   1. The following revision should be made:

      "The proposed K-8 School provides a site plan showing the trash enclosure, and this area would also provide as storage area for collection and removal of recyclable materials. The residential development would also be required comply with the California Solid Waste Reuse and Recycling Act and provide appropriate *storage area for collection and removal of recyclable materials*." A4-1

   For questions regarding comment 1, please contact Nilda Gemeniano of Public Works, Environmental Programs Division at (626) 458-5184 or ngemenia@pw.lacounty.gov.

2. **5.5 Hydrology and Water Quality, 5.5.4 Environmental Impacts, Pg. 5.5-9 to 11**

   2.1 Be advised that the on-site proposed drainage system for the school is not transferable to the Los Angeles County Flood Control District for maintenance and that the School District will be responsible for maintenance of the system in its entirety. A4-2

   For questions regarding comments 2.1, please contact Liana Poghosyan of Public Works, Stormwater Planning Division at (626) 300-3251 or lpoghosyan@pw.lacounty.gov.

   2.2 At this time, we cannot substantiate the finding of less than significant impact with mitigations without an approved hydrology. The DEIR should include an approved hydrology report and mitigations if any for the phase 2 residential development as it is part of this project. A4-3

   2.2.1 Submit a hydrology report to Public Works for review and approval.

   2.2.2 Submit a Low Impact Development Plan (LID) as part of the hydrology report. Comply with LID (Section 12.84.440) standards in accordance with the LID standards manual which is available at https://pw.lacounty.gov/ldd/lib/fp/Hydrology/Low%20Impact%20Development%20Standards%20Manual.pdf.

2. Response to Comments from the DEIR

For questions regarding comment 2.2, please contact Vilong Truong of Public Works, Land Development Division at (626) 458-4921 or vitruong@pw.lacounty.gov.

3. **5.8 Transportation, 5.8.7 Mitigation Measures, 5.8-42 to 46**

The project has the potential to significantly impact the County roadways and intersections in the area. A Traffic Impact Analysis (TIA) was submitted to Public Works and is currently in review. The DEIR should be updated to include all the mitigations identified once the TIA is approved. A4-4

For questions regarding comment 3, please contact Kent Tsujii of Public Works, Traffic Safety and Mobility Division at (626) 300-4776 or ktsujii@pw.lacounty.gov.

4. **Appendix F, Geotechnical Study, Pg. F-1**

Provide a geotechnical report that addresses the entire project description. The presented geotechnical report by Converse Consultants only evaluates the school section of the project but the proposed project limits include residential units. The site is also located within a potentially liquefiable area. Submit a geotechnical report to Public Works, Geotechnical and Materials Engineering Division for review and approval that addresses issues such as, but not limited to, the potential for liquefaction, slope stability, and settlement. The report must discuss and provide recommendations for all mitigation measures required from a geotechnical standpoint as necessary. A4-5

For questions regarding comment 4, please contact Jose Urquizo of Public Works, Geotechnical and Materials Engineering Division at (626) 458-7978 or jurquizo@pw.lacounty.gov.

If you have any questions or require additional information, please contact me at (626) 458-4921 or jsuarez@pw.lacounty.gov

Jose L. Suarez, P.E.
Senior Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921

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A4. Response to Comments from Jose L. Suarez, P.E., Senior Engineer, Los Angeles County Public Works, dated January 21, 2020.

A4-1 DEIR Section 2.2, Notice of Preparation and Initial Study, Table 2-1, Government Agency NOP Written Comments Summary, pages 2-4 and 2-5, has been modified in response to Comment A4-1.

Table 2-1 Government Agency NOP Written Comments Summary

Commenting Agency/Person	Letter Dated	Summary of Comments	Response/Issue Addressed In:
Los Angeles County Public Works Department	8/27/2019	Comments that the California Solid Waste Reuse and Recycling Access Act of 1991 requires each development project to provide an adequate storage area for collection and removal of recyclable materials.	The proposed K-8 School provides a site plan showing the trash enclosure, and this area would also provide as storage area for collection and removal of recyclable materials. The residential development would also be required comply with the California Solid Waste Reuse and Recycling Act and provide appropriate storage area for collection and removal of recyclable materials.

A4-2 As stated in the comment, the District acknowledges in the DEIR that the County will not permit an increase in runoff to the County storm drainage system and will not permit connection to the County system. The proposed project will be required to retain and maintain on-site stormwater runoff. Comment is noted and no further response is necessary.

A4-3 As stated in the DEIR, no specific plans for residential development are available. The residential project will be required to go through a separate discretionary action process through County of Los Angeles with appropriate plans, including, but not limited to a hydrology report and a low impact development plan as part of the hydrology report. Therefore, Mitigation Measure HYD-1 was incorporated. The proposed project, both the school component and the residential component, will not be implemented unless it is demonstrated to the Los Angeles County Director of Public Works that the proposed project will maintain or reduce the project site's runoff rate and volume prior to approval of the final grading plans. When an actual residential development is proposed, a hydrology report and a low impact development plan will be submitted to the County for review and approval.

A4-4 A Traffic Impact Analysis was submitted to the County Public Works and reviewed by Kent Tsujii of Public Works, Traffic Safety and Mobility Division. The Traffic Impact Analysis was revised per the comments and was circulated as Appendix F to the RDEIR.

2. Response to Comments from the DEIR

A4-5 There are no specific plans for the residential development; therefore, a geotechnical report for the residential component is not available. Appendix A, Initial Study, Section 3.7(a)(iii) indicates that the project site is within an area that has been identified as being potentially susceptible to liquefaction. However, because the project site soils consist of silt, silty clay, and clay, the risk of liquefaction is considered low. Furthermore, the proposed project, both the school and the residential components, will be required to comply with the mostly recently adopted California Building Code (CBC) to ensure that impacts from liquefaction is reduced to a less than significant level. If and when an actual specific residential development plan is developed, a geotechnical report will be prepared and submitted to the County for review and approval.

LETTER A5 – Sanitation Districts of Los Angeles County (3 pages)

A5

SANITATION DISTRICTS OF LOS ANGELES COUNTY
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

January 21, 2020

Ref. DOC 5443862

Mr. Mark Hansberger, Director
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, CA 91716

Dear Mr. Hansberger:

DEIR Response for
Wedgeworth K-8 School and Residential Development Project

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on December 6, 2019. The proposed project is located within the jurisdictional boundaries of District No. 21. Previous comments submitted by the Districts in correspondence dated August 27, 2019 (copy enclosed) still apply to the subject project with the following updated comments:

1. 5.5.1.2 EXISTING CONDITIONS, *Page 5.5-6*, Existing Drainage – Stormwater collected along Eagle Park Road and along the east boundary is not conveyed to the San Jose Creek Water Reclamation Plant. Please amend the existing drainage. A5-1

2. 5. Environmental Analysis/UTILITIES AND SERVICE SYSTEMS, *Page 5.10-6*, Response to Impact 5.10-2 – The Districts' Joint Outfall H Unit 7C Trunk Sewer is located in a private right of way along the north side of the San Jose Creek. A5-2

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: A. Schmidt
A. Howard

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2. Response to Comments from the DEIR

SANITATION DISTRICTS OF LOS ANGELES COUNTY
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager
1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

August 27, 2019

Ref. DOC 5249017

Mr. Mark Hansberger, Director, Facilities
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, CA 91716-0002

Dear Mr. Hansberger:

NOP Response for
the Wedgeworth K-8 School and Residential Development Project

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report (NOP) for the subject project on July 29, 2019. The proposed project is located within the jurisdictional boundaries of District No. 21. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project from both phases will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall H Unit 7C Trunk Sewer, located in a private right of way along the north side of the San Jose Creek. The Districts' 33-inch diameter trunk sewer has a capacity of 24.1 million gallons per day (mgd) and conveyed a peak flow of 11.4 mgd when last measured in 2015. A5-3

2. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average flow of 58.5 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson. A5-4

3. The expected increase in average wastewater flow from the project, described in the document as a 600 student increase and 160 single family homes, is 36,960 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link. A5-5

4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of A5-6

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the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Connection Fee Counter at (562) 908-4288, extension 2727.

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the Districts intend to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of the Districts' facilities. A5-7

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

DOC 5285502 D21

2. Response to Comments from the DEIR

A5. Response to Comments from Adriana Raza, Customer Service Specialist, Facilities Planning Department, Sanitation Districts of Los Angeles County, dated January 21, 2020.

A5-1 DEIR page 5.5-6 has been revised per the comment. The revision would not change the analysis or conclusion of the DEIR. No further response is necessary.

Page 5.5-6, Section 5.5.1.2, Existing Conditions. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

There is storm drainage along Eagle Park Road and along the east boundary that conveys collected stormwater to the Lower San Gabriel Valley Reach 4~~,~~ then to ~~San Jose Creek Water Reclamation Plant along~~ San Gabriel River ~~to the north~~.

A5-2 DEIR page 5.10-6 has been revised per the comment. The revision would not change the analysis or conclusion of the DEIR. No further response is necessary.

Page 5.10-6, Section 5.10.4, Environmental Impacts, Impact 5.10-2. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

There is existing 10-inch sewer line in Wedgeworth Drive to the south, which is connected to an 18-inch main in the sewer easement along the north property line before being conveyed to the Sanitation Districts of Los Angeles County's Joint Outfall H Unit 7C Trunk Sewer in a private right-of-way along the north side of the San Jose Creek.

A5-3 The provided information was included in Page 5.10-6, Section 5.10.4, Environmental Impacts, Impact 5.10-2. No further response is necessary.

A5-4 The provided information was included in Page 5.10-7, Section 5.10.4, Environmental Impacts, Impact 5.10-2. No further response is necessary.

A5-5 The provided information was included in Page 5.10-6, Section 5.10.4, Environmental Impacts, Impact 5.10-2. No further response is necessary.

A5-6 The provided information was included in Page 5.10-4, Section 5.10.3, Plans, Programs, and Policies, Regulatory Requirements USS-2. No further response is necessary.

A5-7 The comment does not address any physical environmental impact or adequacy of the DEIR. No further response is necessary.

LETTER A6 – Rowland Water District (2 pages)

A6

Rowland Water District

Board of Directors

Robert W. Lewis, *President*
Teresa P. Rios, *Vice President*
Szu Pei Lu-Yang, *Director*
John E. Bellah, *Director*
Anthony J. Lima, *Director*

Tom Coleman, *General Manager*
Dave Warren, *Assistant General Manager*
Rosemarie Perea, *Director of Admin. Svcs.*

January 7, 2020

Mr. Mark Hansberger
Director, Facilities Projects
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, California 91716

RE: Draft EIR - Wedgeworth K-8 School and Residential Development Project

Dear Mr. Hansberger:

The Rowland Water District (RWD) has conducted a preliminary evaluation of the potential impacts to its water system for the above-captioned project. Please see our comment below with respect to the Draft Environmental Impact Report (DEIR) dated December 5, 2019.

Comment 1 – Rowland Water District's Existing Water System Infrastructure

Section 5.10 – Utilities and Service Systems, states that the Initial Study/Notice of Preparation substantiated that impacts associated with water would be less than significant.

Referencing section 3.19 (b) – Utilities and Service Systems of the Initial Study/Notice of Preparation, the document states that the proposed population increases from this project would be within the limits of growth estimated by RWD, and impacts would be considered less than significant. However, the document does not consider impacts to the existing water system infrastructure.

The DEIR should consider impacts of the project on the existing water system infrastructure regarding the adequacy of flow availability and watermain sizing. Specifically, the size and number of service connections that will be requested to accommodate this project may have an impact on existing adjacent distribution watermains with respect to flow capacity and pipe velocity. The fire flow demand of the project should be considered to ensure that the existing infrastructure surrounding the project limits can adequately supply the required fire flow while maintaining a 20-psi residual pressure as required by the State Water Resources Control Board – Division of Drinking Water. The 20-psi residual pressure requirement provides a buffer against the possibility of negative pressure in the distribution system which could result in contamination ingress into RWD's distribution system. A6-1

The existing watermains on Wedgeworth Dr. and Eagle Park Rd. consist of 10-inch and 6-inch Asbestos Cement Pipe (ACP), respectively. With that said, flow velocity is a factor in determining pipe capacity and size. A6-2

3021 Fullerton Road • Rowland Heights, CA 91748 • Ph: (562) 697-1726 • www.rowlandwater.com

2. Response to Comments from the DEIR

A hydraulic flow analysis of the surrounding watermains should be considered to ensure that the velocities are limited to a maximum of 5 ft/s under normal flow conditions and under 7 ft/s under fire flow plus maximum day conditions as recommended by the American Water Works Association (AWWA) and RWD to minimize friction loss and scouring.

A6-3

In the event that the required fire flow demand for the proposed project cannot be met with the existing infrastructure and/or a hydraulic flow analysis results in flow velocities greater than 5 ft/s under normal flow conditions or greater/equal to 7 ft/s under fire flow plus maximum day conditions, the existing infrastructure adjacent to the proposed project may need to be upgraded.

If you have any questions regarding the foregoing, please feel free to contact Mr. Roy Frausto, Engineering & Compliance Manager at 562-690-7146 or at rfrausto@rowlandwater.com.

Yours truly,

Dave Warren
Assistant General Manager

A6. Response to Comments from Dave Warren, Assistant General Manager, Rowland Water District, dated January 7, 2020.

A6-1 The proposed project will provide a minimum flow of 2,375 gallons per minute at a residual pressure of 20 psi on all new on-site private fire hydrants as required by the State Water Resources Control Board. The Rowland Water District (RWD) tested the 10-inch water main in Wedgeworth Drive on January 25, 2019, and the results indicated that the water main had a static pressure of 91 psi and a residual pressure of 80 psi, which can provide 6,878 gallons per minute at a residual pressure of 20 psi. RWD also tested fire hydrant flow on surrounding public hydrants on May 31, 2019, and the results indicated that the static pressure was 91 psi and the residual pressure was 88 psi, providing 6,600 gallons per minute at a residual pressure of 20 psi. The fire flow tests demonstrated that the existing infrastructure surrounding the project site can provide the required fire flow demand for the proposed project, and upgrades to the existing infrastructure in the street are not necessary. The Los Angeles County Fire Department approved the design of the project on June 10, 2019.

A6-2 The proposed project would add a 4-inch potable water service line with a 3-inch water meter and an 8-inch fire service line into the 10-inch water main in Wedgeworth Drive. No improvements are planned for the 6-inch watermain in Eagle Park Road. The existing water meter for the existing Wedgeworth Elementary School would be removed once the new school is operational. The District will submit the new fire water and domestic water line plans for the proposed project to RWD for review and approval prior to the start of project construction, therefore ensuring that the pipe capacity and size are adequate.

A6-3 See Response A6-1. Since the 10-inch water main in Wedgeworth Drive can provide the required fire flow demand with the existing infrastructure, the existing infrastructure does not need to be upgraded, and no additional hydraulic flow analysis would be necessary.

2. Response to Comments from the DEIR

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LETTER A7 – South Coast Air Quality Management District (11 pages)

A7

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
mhansberger@hlpusd.k12.ca.us
Mark Hansberger, Director, Facilities Projects
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, CA 91716-0002

January 21, 2020

Draft Environmental Impact Report (Draft EIR) for the Proposed Wedgeworth K-8 School and Residential Development Project (SCH No.: 2019071040)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 187,310 square feet of existing school facilities and four baseball fields, and construct 160 residential units and 82,998 square feet of new school facilities to accommodate an increase in enrollment capacity from 600 to 1,200 students on 20 acres (Proposed Project). The Proposed Project is located at 16494 Wedgeworth Drive on the northwest corner of Wedgeworth Drive and Ridge Park Drive in the community of Hacienda Heights within Los Angeles County. Construction of the Proposed Project will occur in two phases (Phases 1 and 2) over a seven-year period from 2020 through 2026[1]. It is anticipated that Phase 1, which includes operations of the new school facilities, will become operational while Phase 2 is still under construction[2]. Upon reviews of Figure 3-4: *Conceptual Wedgeworth K-8 School and Residential Development Site Plan* in the Draft EIR and aerial photographs, South Coast AQMD staff found that the Proposed Project will be located within 500 feet of State Route 60 (SR-60)[3]. A7-1

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction emissions from Phases 1 and 2, including overlapping construction phases, and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that during Phase 1, the Proposed Project's maximum unmitigated construction air quality impacts would be significant for regional nitrogen oxide (NOx) emissions at 111 pounds per day (lbs/day)[4], which is above South Coast AQMD's air quality CEQA significance threshold for NOx at 100 lbs/day, and for localized PM10 and PM2.5 emissions during overlapping site preparation, grading, and utility trenching phases[5]. During Phase 2, the Proposed Project's maximum unmitigated construction air quality impacts would be significant for regional volatile organic compounds (VOC) at 100 lbs/day, which is above South Coast AQMD's air quality CEQA significance threshold for VOC at 75 lbs/day. The Lead Agency is committed to implementing construction Mitigation Measures (MMs) AQ-1 through AQ-3, which require that all construction equipment used for building demolition activities meet EPA's Tier 3 off-road emissions standards, that all interior architectural coatings meet a low VOC concentration of 30 grams per liter, and that all exposed

[1] Draft EIR, Chapter 3, Project Description, "3.3.1.2 Project Phasing" Page 3-3.
[2] *Ibid.*
[3] *Ibid.*, Page 3-11.
[4] Draft EIR, Chapter 5.1, Air Quality, Pages 5.1-25 through 5.1-26.
[5] *Ibid.*, Pages 5.1-28 through 5.1-27.

2. Response to Comments from the DEIR

ground surfaces and disturbed areas be watered three times per day during Phase 1 site preparation[6]. With implementation of MMs AQ-1 through -3, maximum regional NOx and VOC emissions from construction would be reduced to less than significant at 78 lbs/day and 60 lbs/day, respectively. Localized PM10 and PM2.5 emissions would also be reduced to less than significant[7].

The Lead Agency also quantified the Proposed Project's operational emissions from Phase 1 and Phases 1 and 2 combined. Based on the analyses, the Lead Agency found that the Proposed Project's operational air quality impacts would be less than significant[8]. As such, no mitigation measures for operational air quality impacts were included[9].

A7-1 cont.

The Lead Agency prepared a Health Risk Assessment (HRA) analysis to disclose potential health risks for receptors within a quarter-mile radius to the school, which includes SR-60. The Lead Agency found that the unmitigated cancer risk from the surrounding high-volume freeway and existing emission sources would be 2.4 in one million for students[10] and 1.5 in one million for staff[11], both of which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[12].

The Lead Agency included in the Draft EIR discussions on applicable South Coast AQMD rules[13], including Rule 401 – Visible Emissions[14], Rule 402 – Nuisance[15], Rule 403 – Fugitive Dust[16], Rule 445 – Wood-Burning Devices[17], Rule 1113 – Architectural Coatings[18], and Rule 1403 – Asbestos Emissions form Demolition[19].

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality and HRA Analyses. First, the Lead Agency did not discuss or analyze an overlapping construction and operation impact scenario. Second, the Proposed Project's operational emissions from operation of school buses may be underestimated. Third, the Lead Agency did not use the appropriate age bins, starting from the third trimester, to calculate cancer risk for future students at the Proposed Project. Moreover, although the Lead Agency performed a HRA analysis for future students at the Proposed Project, it did not discuss the potential long-term health risk to future residents who will live at the Proposed Project in close proximity to SR-60, which is capable of attracting diesel fueled, heavy-duty trucks that emit diesel particulate matter (DPM). To further reduce the Proposed Project's regional and localized air quality impacts during construction and operation, South

A7-2

[6] *Ibid.* Page 5.1-33.
[7] *Ibid.* Pages 5.1-34 through 5.1-35.
[8] *Ibid.* Pages 5.1-26 through 5.1-27.
[9] *Ibid.*
[10] Draft EIR. Appendix D: Health Risk Assessment. Page 21.
[11] *Ibid.*
[12] South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.
[13] *Ibid.* Pages 5.1-10 through 5.1-11.
[14] South Coast AQMD Rule 401 – Visible Emissions. Accessed at: http://www.aqmd.gov/docs/default-source/compliance/visible-emissions.pdf
[15] South Coast AQMD Rule 402 – Nuisance. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[16] South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.
[17] South Coast AQMD Rule 455 – Wood-Burning Devices. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-445.pdf
[18] South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[19] South Coast AQMD. Rule 1403 – Asbestos Emissions form Demolition. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf

Mark Hansberger January 21, 2020

Coast AQMD staff recommends revisions to existing air quality mitigation measures and additional mitigation measures that the Lead Agency should incorporate in the Final EIR. South Coast AQMD staff also recommends that the Lead Agency incorporate strategies to reduce exposures to DPM. Please see the attachment for more information. A7-2 cont.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to MM AQ-1 and AQ-3 and the additional mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091). A7-3

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC191206-02
Control Number

3

2. Response to Comments from the DEIR

Mark Hansberger January 21, 2020

ATTACHMENT

Air Quality Analysis – Overlapping Construction and Operational Activities

1. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not discuss or analyze a scenario where construction activities overlap with net new operational activities (e.g., some components of Phase 1 may be operational while some components of Phase 2 are under construction). Since implementation of the Proposed Project is expected to occur in two phases over a seven-year timeframe from 2020 to beyond 2026[20], it is reasonably foreseeable that construction and operation of the two phases may overlap. If an overlapping construction and operation scenario is reasonably foreseeable, to conservatively analyze a worst-case impact scenario, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping construction and operational years and development components, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR, unless the Lead Agency includes requirement(s) to prohibit overlapping construction and operational activities in the Final EIR. A7-4

Air Quality Analysis – CalEEMod Mobile Sources

2. In the main body of the Draft EIR[21] and Appendix J: *Traffic*[22], the Lead Agency explained that the Proposed Project, which includes a capacity increase of 600 more students, will include the operation of school buses. Upon review of the CalEEMod output files in Appendix C: *Air Quality/GHG Data*, South Coast AQMD staff found that the fleet mix used in CalEEMod to quantify the Proposed Project's net new operational emissions from mobile sources assumed that school buses will only make up 0.000429%, or less than 0.5 percent, of the Proposed Project's elementary school fleet mix[23]. Since operation of the Proposed Project includes an increase in student capacity by 50 percent from 600 to 1,200 students, it is reasonably foreseeable that additional school buses may be needed to accommodate the enrollment increase, which may generate additional operational emissions. If it is reasonably foreseeable that operation of the Proposed Project will require an increase in the amount of school buses, in addition to what is already in operation, the Lead Agency should quantify operational emissions from new school bus trips, and include those emissions in the Proposed Project's operational emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for operation to determine the level of significance in the Final EIR. If emissions from new school bus trips are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. A7-5

Health Risk Assessment (HRA) Analysis for Sensitive Receptors Sited Near a Freeway and Other Sources of Air Pollution

3. Notwithstanding the court rulings, South Coast AQMD staff recognizes that Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD's concern about the potential public health impacts of siting sensitive populations within close proximity to major sources of air pollution, such as high-volume freeways, South Coast AQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions. A7-6

HRA Analysis for Future New School Children and Staff Sited Near SR-60

[20] Draft EIR. Chapter 3. Project Description. "3.3.1.2 Project Phasing" Page 3-3.
[21] *Ibid.* Page 3-2.
[22] Draft EIR. Appendix J: *Traffic*. Page 61.
[23] Draft EIR. Appendix C: *Air Quality/GHG Data*. CalEEMod Output File "Wedgeworth ES Operations Run". PDF page 525.

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Mark Hansberger January 21, 2020

4. In the Draft EIR, the Lead Agency prepared a mobile source HRA analysis to disclose potential health risks to future new students attending and staff working at the Proposed Project. Upon review of the HRA analysis, South Coast AQMD staff found that the parameters used to calculate cancer risk were improper, which may have led to an under-estimation of the health risk impacts in the Draft EIR. Detailed comments are as follows:

   a) The Lead Agency used nine years of exposure to calculate cancer risk to students at Wedgeworth Elementary School, consisting of risk exposures for the 2 to 16 years age bin[24]. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) guidelines acknowledge that children are more susceptible to exposures to air toxics and have revised the way cancer risks are estimated to take this into account. When calculating cancer risk to students, South Coast AQMD staff recommends that the Lead Agency start from the third trimester, calculate cancer risk for each individual age group (i.e., the third trimester to 0 year age bin, the 0 to 2 years age bin, the 2 to 9 years age bin, and the 9 to 16 years age bin), assign proper exposure parameters for each individual age group, sum cancer risks for individual age groups to estimate cancer risk for a 30-year exposure duration, and compare the summed cancer risk to South Coast AQMD CEQA significance threshold of 10 in a million for cancer risk to determine the level of significance in the Final EIR. A7-7

   b) The Lead Agency modeled SR-60's operational emissions during the hours of school operation (Mondays through Fridays 8:00AM-4:00PM), which would equal to 40 hours of operation per week, rather than assuming continuous operations of vehicles and trucks on SR-60. The Lead Agency also used improper emission scalars when modeling the variable emissions. South Coast AQMD staff recommends emission sources from SR-60 be modeled as continuous operations (24 hours/day, seven days/week, and 52 weeks/year) by using the default emission rate of 1g/s, 24 hours a day, for 365 days a year in AERMOD to estimate the cancer risks. Alternatively, if the Lead Agency has substantial evidence to support the restriction of operating hours for SR-60, the Lead Agency should revise the variable emission scalar in AERMOD. Since continuous operations occur over seven days a week result in 168 hours (24 hours multiplied by seven days), a variable emissions scenario should account for 168 hours of operation, rather than only 40 hours. Therefore, the Lead Agency should use 4.2 instead of 0.9[25] for each hour of operation (168 hours divided by 40 hours) and 0 for each hour of nonoperation in AERMOD. A7-8

   HRA Analysis for Future Residents Sited Near SR-60

5. Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project will include construction of 160 residential units. Based on a review of Figure 3-4: *Conceptual Wedgeworth K-8 School and Residential Development Site Plan* in the Draft EIR, South Coast AQMD staff found that SR-60 is within 27 feet of the residential portion of the Proposed Project. Sensitive receptors living at the Proposed Project could be exposed to DPM emissions from diesel fueled, heavy-duty trucks passing by on SR-60. The California Air Resources Board (CARB) has identified DPM as a toxic air contaminant based on its carcinogenic effects[26]. Therefore, South Coast AQMD staff recommends A7-9

[24] *Ibid.* Appendix D: *Health Risk Assessment*, Page D-6.
[25] Technical Excel File "SEI for SR-60". The "Hour of Day Scalars" the Lead Agency used for Passenger Vehicles from 8:00 AM – 4:00 PM include: .933, .911, .922, .939, .956, .977, .946, .931; and scalars for Trucks for the same operational hours include: .922, .865, .867, .883, .917, .950, .932, .923.
[26] California Air Resources Board. August 27, 1998. Resolution 98-35. Accessed at: http://www.arb.ca.gov/regact/diesltac/diesltac.htm.

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that the Lead Agency consider health impacts on future residents living at the Proposed Project by performing a mobile source HRA[27] analysis to disclose the potential health risks in the Final EIR[28]. This will facilitate the purpose and goal of CEQA on public disclosure and enable decision-makers with meaningful information to make an informed decision on project approval. This will also foster informed public participation by providing the public with useful information that is needed to understand the potential health risks from living in close proximity to freeways.

Guidance on Siting Sensitive Receptors Near a Freeway or Other Sources of Air Pollution

6. South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005[29]. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. Additional guidance on siting incompatible land uses can be found in the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. In the Handbook, CARB recommends avoiding new sensitive land uses such as the Proposed Project (e.g., students and residents) within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day[30]. Therefore, South Coast AQMD staff recommends that the Lead Agency review these guidance documents when making local planning and land use decisions.

A7-10

Recommended Revisions to Existing Air Quality Mitigation Measures (MMs) AQ-1 and AQ-3

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. With the implementation of MMs AQ-1 and AQ-3, which require the use of Tier 3 construction equipment and watering of disturbed soil three times per day, maximum localized PM10 construction emissions would be reduced from 16.22 lbs/day to 13.14 lbs/day, which would be slightly below South Coast AQMD's CEQA localized air quality significance threshold at 14 lbs/day[31] for construction in Source Receptor Area 11 – South San Gabriel Valley (SRA 11). Additionally, maximum localized PM2.5 construction emissions would be reduced from 10.18 lbs/day to 8.11 lbs/day, slightly below South Coast AQMD's CEQA localized air quality significance threshold at 9 lbs/day[32] for construction in SRA 11. To further reduce the Proposed Project's localized air quality impacts from PM10 and PM2.5 emissions during construction on nearby sensitive receptors such as existing students and staff attending and working at the Proposed Project, South Coast AQMD staff recommends that the Lead Agency make the following revisions to MMs AQ-1 and AQ-3 in the Final EIR.

A7-11

[27] South Coast AQMD. Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/airquality-analysis-handbook/mobile-source-toxics-analysis.

[28] South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

[29] South Coast AQMD. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.

[30] *Ibid.* Table 1-1. Page 4.

[31] *Ibid.* Page 46.

[32] *Ibid.* Page 46.

Mark Hansberger January 21, 2020

AQ-1

The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall, at minimum, use equipment that meets the EPA's Tier ~~3~~ 4 Final emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all ~~building demolition~~ construction phases, unless it can be demonstrated to the District that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier ~~3~~ 4 Final emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions[33]. A list of CARB verified DPFs are available on the CARB website[34].

A7-11 cont.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. Prior to construction, the project engineer shall ensure that all building ~~demolition~~ construction plans clearly show the requirement for EPA Tier ~~3~~ 4 Final emissions standards for construction equipment over 50 horsepower for ~~demolition~~ all construction activities.

During construction, the construction contractor shall maintain a list of all operating equipment associated with ~~building demolition~~ each construction phase in use on the site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site, including CARB or South Coast AQMD operating permit (if applicable). Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance and conduct regular inspections to the maximum extent feasible to ensure compliance.

In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim emission standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting construction phases occurring simultaneously.

AQ-3

The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas three times per day during ~~Phase 1 site preparation~~ all soil disturbing construction activities (e.g., site preparation and grading) to minimize fugitive dust. Prior to construction, the construction

A7-12

[33] CARB. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf

[34] *Ibid.* Page 18.

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contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.

Additional Recommended Mitigation Measures for Operational Air Quality Impacts

8. South Coast AQMD staff has compiled a list of additional mitigation measures as suggested resources and guidance to the Lead Agency and recommends that the Lead Agency incorporate them in the Final EIR to further reduce the Proposed Project's air quality impacts. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website[35].

Mitigation Measures for Construction Air Quality Impacts

a) Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate. A7-13

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent[36]. Since the construction schedule of the Proposed Project extends beyond 2023 till 2027, 2010 model year trucks will be required for the Proposed Project and should become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines. Early implementation of the Truck and Bus Regulation at the Proposed Project will assist construction management planning with a preference for construction contractor(s) who can supply 2010 model year trucks, facilitate the transition to 2010 model year trucks in 2023, provide time and opportunities to resolve implementation challenges ahead of 2023, ease the costs and burden of regulatory compliance with the Truck and Bus Regulation, and yield emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.

[35] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.
[36] California Air Resources Board. December 20, 2018. https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm

b) Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines. A7-14

Mitigation Measures for Operational Air Quality Impacts

c) Since the Proposed Project includes operation of an elementary school with an additional 600 students expected at the Proposed Project, the Lead Agency should take this opportunity to encourage operators of new school bus fleets that would regularly visit the Proposed Project to seek funding opportunities to replace older diesel buses with cleaner school buses. (See also Comment No. 2). South Coast AQMD's Lower-Emission School Bus Program provides funding to applicable fleets for the purchase of alternatively fueled buses or retrofits for older diesel buses. More information on this program can be found at South Coast AQMD's website: https://www.aqmd.gov/home/programs/business/lower-emission-school-bus-program A7-15

d) Funding opportunities are also available through the CARB's administration of the Volkswagen Environmental Mitigation Trust for California for Zero-Emission Transit, School, and Shuttle Buses. More information about the application process for this funding opportunity can be found at: http://vwbusmoney.valleyair.org/. More information on additional funding opportunities through CARB's program can be found at: https://ww2.arb.ca.gov/our-work/programs/volkswagen-environmental-mitigation-trust-california/about.

e) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers. A7-16

f) Require the use of electric or alternatively fueled sweepers with HEPA filters.

g) Maximize the planting of trees in landscaping and parking lots.

h) Use light colored paving and roofing materials.

i) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Health Risk Reduction Strategies

9. The Proposed Project will site sensitive receptors within 500 feet of SR-60, which, in 2016, had 51,894 annual average daily truck trips, 54% of which was comprised of 4- and 5-axle trucks at Nogales Street (Post Mile (PM) 20.428)[37]. Since future students, staff, and residents at the Proposed Project would be exposed to DPM emissions from the mobile sources traveling on SR-60 (e.g., diesel fueled, heavy-duty trucks), South Coast AQMD staff recommends that the Lead Agency consider to incorporate the following health risk reduction strategies at the new school facilities and residential development, at a minimum, when making local planning and land use decisions. A7-17

   Many strategies are available to reduce exposure, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. Installation of enhanced

[37] California Department of Transportation. 2016. *Truck Traffic: Annual Average Daily Truck Traffic*. Accessed at: https://dot.ca.gov/-/media/dot-media/programs/traffic-operations/documents/f0017681-2016-aadt-truck-a11y.pdf

2. Response to Comments from the DEIR

filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

Enhanced filtration systems have limitations. In a study that South Coast AQMD conducted to investigate filters[38], a cost burden is expected to be within the range of $120 to $240 per year to replace each filter. The initial start-up cost could substantially increase if an HVAC system needs to be installed. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the building tenants. It is typically assumed that the filters operate 100 percent of the time while sensitive receptors are indoors, and the environmental analysis does not generally account for the times when sensitive receptors have windows or doors open or are in common space areas of a project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residences prior to assuming that they will sufficiently alleviate exposures to DPM emissions.

Because of limitations, to ensure that enhanced filters are enforceable throughout the lifetime of the Proposed Project and effective in reducing exposures to DPM emissions, South Coast AQMD staff recommends that the Lead Agency provide additional details regarding the ongoing, regular maintenance, and monitoring of filters in the Final EIR. To facilitate a good-faith effort at full disclosure and provide useful information to students, parents, staff, and residents who will attend school, work, and/or live at the Proposed Project, which is in close proximity to SR-60, at a minimum, the Final EIR should include the following information:

A7-17 cont.

- Disclose the potential health impacts to prospective students and parents, staff, and residents from attending school, working and/or living in a close proximity to sources of air pollution (e.g., high-volume freeway, etc.) and the reduced effectiveness of the air filtration system when windows are open and/or when students, staff, and/or residents are outdoors (e.g., in the common usable open space areas);
- Identify the responsible implementing and enforcement agency such as the Lead Agency, School District, or Homeowners Association (HOA), to ensure that enhanced filtration units are installed on-site at the Proposed Project before a permit of occupancy is issued;
- Identify the responsible implementing and enforcement agency, such as the Lead Agency, School District, or HOA to ensure that enhanced filtration units are inspected and maintained regularly;
- Disclose the potential increase in energy costs for running the HVAC system to the School District, HOA representatives and/or prospective residents;
- Provide information to the School District and/or HOA representatives and/or prospective residents on where the MERV filers can be purchased;
- Provide recommended schedules (e.g., every year or every six months) for replacing the enhanced filtration units;

[38] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf

- Identify the responsible entity, such as the School District, HOA, residents themselves, or property management, for ensuring enhanced filtration units are replaced on time, if appropriate and feasible (if the School District and/ or residents should be responsible for the periodic and regular purchase and replacement of the enhanced filtration units, the Lead Agency should include this information in the disclosure form);
- Identify, provide, and disclose ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Set City-wide, School District-wide, or Proposed Project-specific criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Develop a City-wide, School District-wide, or Proposed Project-specific process for evaluating the effectiveness of the enhanced filtration units.

A7-17 cont.

2. Response to Comments from the DEIR

A7. Response to Comments from Lijin Sun, J.D., Program Supervisor, CEQA IGR, Planning Rule Development and Area Sources, South Coast Air Quality Management District, dated January 21, 2020.

A7-1 The comment includes introductory remarks and a summary of the project description, air quality analysis, health risk assessment (HRA).No response is required for general comments and responses to the detailed comments are provided below.

A7-2 The general comments indicate concerns that the Lead Agency did not discuss or analyze overlapping construction and operation impact scenario, that the operational emissions from school buses may be underestimated, and that the Lead Agency did not use the appropriate age bins to calculate risk to future students at the proposed project. Responses to these concerns are provided in Comments A7-4 through A7-17 below.

Additionally, the comment indicates concerns that the Lead Agency did not discuss the potential long-term health risk to future residents who will live in the proposed residential uses. Responses to this concern is provided in Comment A7-9.

A7-3 The comment requests the Lead Agency provide written responses to all comments contained herein prior to certification of the Final EIR. Responses are provided.

A7-4 The commenter recommends analysis of a combined scenario where project-related construction and operational activities would overlap. While the commenter recommends use of the South Coast Air Quality Management District (South Coast AQMD) regional operational significance thresholds to evaluate the combined operation and construction emissions to, South Coast AQMD has not released formal guidance on the regional significance thresholds for this scenario. However, as recommended, Table 1 is included below for informational purposes. The table shows the maximum daily emissions for a scenario where project-related construction and operation activities overlap. Based on the development timeline for the proposed project, it is anticipated that construction activities could occur concurrently with operations at the proposed school starting in year 2024 during Phase 2 construction. For purposes of this discussion, the maximum daily combined emissions shown in the table represent a slightly conservative scenario as the maximum daily operational emissions are based on calendar year 2021 vehicle emission rates. In general, vehicle emission rates for calendar year 2024, which is the year the overlap scenario would occur, would be slightly lower than the rates for calendar year 2024 due to vehicle turnover of older vehicles to newer cleaner vehicles.

Table 1 Potential Overlap of Construction and Operational Activities

Maximum Daily Emissions	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Phase 2 Maximum Daily Construction Emissions[1]	100	28	25	<1	9	5
Year 2021 Maximum Operational Emissions	4	1	6	<1	1	<1
Max Daily Combined Emissions[2]	104	29	31	<1	10	6
South Coast AQMD Operational Regional Significance Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	Yes	No	No	No	No	No

Source: CalEEMod, Version 2016.3.2.
Notes:
[1] Based on the maximum daily emissions generated during Phase 2 construction activities, which are anticipated to occur between years 2024 and 2025.
[2] The maximum daily combined emissions represent a slightly conservative scenario because calendar year 2021 vehicle emission rates are generally slightly higher than emission rates for calendar years 2024 and 2025, the years in which Phase 2 construction activities would occur.

As shown in the table, the combined emissions would exceed the operational regional significance threshold for VOC. The primary reason for the exceedance is associated with project-related construction emissions, which by itself exceeds the VOC regional significance threshold. Another reason is comparison of construction-related emissions to the South Coast AQMD regional operational significance thresholds, which are more stringent than the South Coast AQMD regional construction significance thresholds for NO_X and VOC. As stated, South Coast AQMD has not released or adopted formal guidance on the regional significance thresholds to use for the scenario involving overlap of construction and operation. However, in response to the commenter, Mitigation Measure AQ-2 has been revised to require use of zero-VOC-content paints (i.e., 0 to 5 grams per liter) as shown below and in Chapter 3, *Revisions to the Draft EIR*. Deletions to the text are shown in ~~strikethrough~~ and additions are shown in underline.

AQ-2 The ~~Hacienda La Puente Unified School District (District)~~ ~~shall specify in the construction bid that the~~ construction contractor(s) shall only use zero VOC (volatile organic compound) content (i.e., 0 to 5 grams per liter) interior paints and ~~with a~~ low VOC (volatile organic compound) content with a maximum concentration of 30 grams per liter (g/L) exterior paints for residential building architectural coating to reduce VOC emissions. All building and site plans shall note use of zero-VOC-content paints ~~with a maximum VOC concentration of 30 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show this requirement.~~ This requirement shall be noted on all construction management plans.

As shown in Table 2, below, the revised Mitigation Measure AQ-2, which requires zero-VOC-content interior paints (i.e., paints with a VOC content of 5 grams per liter or less),

would reduce VOC emissions to below the South Coast AQMD regional significance threshold for operation.

Table 2 Potential Overlap of Construction and Operational Activities With Mitigation

Maximum Daily Emissions	Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Emissions with Original Mitigation Measure AQ-2						
Phase 2 Maximum Daily Construction Emissions[1]	60	28	25	<1	9	5
Year 2021 Maximum Operational Emissions	4	1	6	<1	1	<1
Max Daily Combined Emissions[2]	64	29	31	<1	10	6
South Coast AQMD Operational Regional Significance Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	Yes	No	No	No	No	No
Emissions with Revised Mitigation Measures AQ-2						
Phase 2 Maximum Daily Construction Emissions[3]	33	28	25	<1	9	5
Year 2021 Maximum Operational Emissions	4	1	6	<1	1	<1
Max Daily Combined Emissions[2]	37	29	31	<1	10	6
South Coast AQMD Operational Regional Significance Thresholds	55	55	550	150	150	55
Exceeds Thresholds?	No	No	No	No	No	No

Source: CalEEMod, Version 2016.3.2.
Notes:
[1] Based on the maximum daily emissions generated during Phase 2 construction activities, which are anticipated to occur between years 2024 and 2025.
[2] The maximum daily combined emissions represent a slightly conservative scenario because calendar year 2021 vehicle emission rates are generally slightly higher than emission rates for calendar years 2024 and 2025, the years in which Phase 2 construction activities would occur.
[3] Incorporates revised Mitigation Measure AQ-2, which would require use of zero VOC interior paints during construction for all residential buildings. For purposes of modeling, zero VOC paint is assumed to have a VOC content of 5 grams per liter.

A7-5 The commenter correctly states the fleet mix assumed for school buses in the CalEEMod modeling result in less than one daily trip and recommends updating the modeling to reflect additional school bus trips. The existing school operations currently does not provide busing for the students. While development of the proposed project could result in providing school busing for special needs students, it is anticipated that the number of school bus trips accommodating the special needs students would be minimal. Thus, although the addition of more school bus trips into the air emissions modeling could result in higher daily emissions, it is not anticipated that these additional school bus trips would substantially increase maximum daily emissions over what is shown in Table 5.1-11 and Table 5.1-12 of the DEIR and result in maximum daily emissions that would exceed the South Coast Air Quality Management District (AQMD) regional significance thresholds for operations. As shown in Tables 5.1-11 and 5.1-12, the maximum daily emissions are substantially below the regional significance thresholds. As stated on page 5.1-22 of the DEIR, the proposed school and residential uses are projected to generate 1,134 weekday average daily trips (ADT) and 1,171 weekend ADTs, respectively. Based on estimated emissions shown in Tables 5.1-11 and 5.1-12, even if the ADTs were to be

doubled, thereby doubling the project-related operational mobile-source emissions, the maximum daily emissions would still not exceed the South Coast AQMD regional significance thresholds for emissions. Because it is not anticipated that the proposed project would result in new school bus trips in these amounts, it is anticipated that accounting for additional school buses would not materially change the results and cause an exceedance of the regional significance thresholds.

A7-6 The comment recommends that the lead agency review and consider an HRA analysis for future school children and staff sited near SR-60. An HRA has been provided and is included as Appendix D to the DEIR. The HRA analyzed cancer and non-cancer risks to students and staff attending the future school. No further response is necessary.

A7-7 The commenter states the Lead Agency determined the cancer risk to students at proposed school site using the 2 to 16 years age bin. The commenter describes the protocol for determining a 30-year residential cancer risk per the 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) guidelines. As substantiated in Appendix D, *Health Risk Assessment*, of the DEIR, nearby emission sources would not result in incremental cancer risks which exceed the South Coast Air Quality Management District CEQA significance threshold of 10 in one million for future students and school workers. The exposure durations for each receptor type (i.e., 9-year period from kindergarten through 8th grade school student and 25-year period for school worker) are based on the 2015 OEHHA guidelines. Typical K-8 grade school students would not be exposed to cancer risks for 30 years.

A7-8 The comment indicates the modeling for SR-60 operational emissions was incorrect, used improper emission scalars, and suggests SR-60 emissions be modeled as continuous operations (24 hours/day, 7 days/week, 52 weeks/year). As described in DEIR Appendix D, *Health Risk Assessment*, Section 4, the toxic air contaminant emission rates for SR-60 were calculated based on peak hourly vehicle traffic and not the average daily traffic. Because future school students will not be exposed to the maximum or peak hour emission rates over the entire school day, emission rates were scaled using Caltrans Performance Measurement System (PeMS) data for the segment of SR-60 nearest the proposed project. For example, the variable emission scalar during the peak hour would be 1 and for the remaining non-peak hours less than 1. Using this methodology allows for more accurately calculating the vehicle emissions a nearby receptor (i.e., school student) would be exposed to over a given period of time (i.e., typical school hours). Additionally, the AERMOD air dispersion model allows for emission rate adjustments in the variable emissions module for both noncontinuous sources (i.e., businesses which operate less than 168 hours per week) and for receptors not exposed to continuous source emissions (i.e., workplace or school receptors near continuous sources such as freeways). Therefore, the exposures for school-based receptors to SR-60 emissions were modeled appropriately over typical school hours (between 8 am and 4 pm) and exposure frequency (40 hours per week).

2. Response to Comments from the DEIR

A7-9 The commenter recommends the Lead Agency consider health impacts on future residents living at the proposed project by performing a mobile source HRA analysis to disclose the potential health risks in the Final EIR. As noted on page 5.1-20 of the DEIR, per the California Supreme Court ruling in *California Building Industry Association v. Bay Area Air Quality Management District*, the evaluation of potential impacts of the environment on a project is generally outside the purview of CEQA. However, although an HRA for residential portion of the proposed project from existing off-site emissions sources is not required under CEQA, future developers/applicants are required to submit an HRA to the County of Los Angeles (County) pursuant to the *Los Angeles County General Plan Update, Mitigation Monitoring and Reporting Program, Mitigation Measure AQ-3* (County of Los Angeles, 2015). Future developers/applicants for the residential portion of the proposed project are required by Mitigation Measure AQ-3 of the County General Plan to analyze and mitigate potential health risks to future residents of the proposed project. The mitigation measure from the Los Angeles County General Plan is provided below.

> Los Angeles County General Plan Update, Mitigation Monitoring and Reporting Program, Mitigation Measure AQ-3:
>
> > Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:
> >
> > - Industrial facilities within 1000 feet
> > - Distribution centers (40 or more trucks per day) within 1,000 feet
> > - Major transportation projects (50,000 or more vehicles per day) within 1,000 feet
> > - Dry cleaners using perchloroethylene within 500 feet
> > - Gasoline dispensing facilities within 300 feet
> >
> > Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County of Los Angeles and shall be verified by the County's Planning Department.

A7-10 The commenter recommends the Lead Agency review referenced guidance documents when making local planning and land use decisions. The District has reviewed them.

A7-11 Commenter states that "CEQA requires all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts." The commenter also notes that while Mitigation Measures AQ-1 and AQ-3 would reduce project construction-related PM_{10} and $PM_{2.5}$ on-site emissions to below their respective screening-level localized significance thresholds (LSTs), recommended revisions were provided for Mitigation Measure AQ-1 that would result in further emissions reductions below the screening-level LSTs.

CEQA requires the lead agency to identify feasible mitigation measures that will avoid or substantially lessen a project's significant effects. As noted by the commenter, and detailed in Section 5.2, *Air Quality*, of the DEIR, Mitigation Measures AQ-1 and AQ-3 were incorporated into the project and would reduce construction-related localized air quality impacts to a less than significant level. Per CEQA Guidelines Section 15126.4(a)(4), "mitigation measures must be 'roughly proportional' to the impacts of the project." Because Mitigation Measures AQ-1 and AQ-3 are shown to suffice in reducing potential construction-related localized impacts to less than significant levels, no additional measures to further reduce construction-related emissions are necessary.

A7-12 The commenter provides recommended revisions to Mitigation Measure AQ-3 that would expand the three times per day watering requirement for Phase 1 site preparation activities only to all ground-disturbing activities for both Phase 1 and Phase 2 of development. However, as stated in Response to Comment A7-11, because Mitigation Measure AQ-3 and Mitigation Measure AQ-1 are shown to suffice in reducing potential construction-related localized impacts to less than significant levels, no additional measures to further reduce construction-related emissions are necessary per CEQA Guidelines Section 15126.4(a)(4). However, Mitigation Measure AQ-3 has been revised as shown below and in Chapter 3, *Revisions to the Draft EIR*, of this FEIR. Deletions to the text are shown in ~~strikethrough~~ and additions are known <u>underline</u>.

AQ-3 The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas a minimum of three times per day during Phase 1 site preparation and grading activities to minimize fugitive dust and require additional watering as necessary if there is any evidence of wind-driven fugitive dust as defined in South Coast Air Quality Management District Rule 403(c)(36) (i.e., "visible emissions from any disturbed surface area which is generated by wind action alone"). In addition, the District shall also specify in the construction bid contract that the construction contractor(s) shall post visible signage that contains the South Coast AQMD complaint hotline telephone number in addition to the contact information for a District representative to report any complaints related to project construction activities. These signs shall be placed on the outer side of the construction areas or in such areas that are plainly visible to the public. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.

A7-13 The commenter identifies and recommends, as part of a list of additional construction-related mitigation measures, to include use of zero-emission or near-zero emissions on-road haul trucks. As stated in Response to Comment A7-11, per CEQA Guidelines Section 15126.4(a)(4), "mitigation measures must be 'roughly proportional' to the impacts of the project." Because Mitigation Measures AQ-1 through AQ-3 are shown to suffice in reducing potential construction-related localized impacts to less than significant levels, no additional measures to further reduce construction-related emissions are necessary.

A7-14 The commenter identifies and recommends, as part of a list of additional construction-related mitigation measures, to encourage construction contractors to apply for South Coast Air Quality Management District "SOON" funds. As stated in Response to Comment A7-11, per CEQA Guidelines Section 15126.4(a)(4), "mitigation measures must be 'roughly proportional' to the impacts of the project." Because Mitigation Measures AQ-1 through AQ-3 are shown to suffice in reducing potential construction-related localized impacts to less than significant levels, no additional measures to further reduce construction-related emissions are necessary.

A7-15 The commenter provides a list of recommended mitigation measures related to reducing project-related operational air quality impacts. Because no potentially significant operation-related air quality impacts were found for the proposed project, mitigation measures are not required pursuant to CEQA Guidelines Section 15126.4(a)(3), which states that "mitigation measures are not required for effects which are not found to be significant."

A7-16 Please refer to Response to Comment A7-15.

A7-17 The commenter recommends the Lead Agency consider incorporating health risk strategies at the new school facilities and residential development and provides several

strategies to reduce exposures in residences. See Response to Comment A7-9 in regard to health risk strategies for the residential portion of the project. As substantiated in Appendix D, *Health Risk Assessment*, of the DEIR, nearby emission sources would not result in incremental cancer risks which exceed the South Coast Air Quality Management District CEQA significance threshold of 10 in one million for future students and school workers.

2. Response to Comments from the DEIR

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2.2 INDIVIDUAL RESPONSE TO COMMENTS (DEIR COMMENTS)

2. Response to Comments from the DEIR

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LETTER R1 – Jolene Blanco (2 pages)

R1

From: Jolene Blanco [redacted]
Sent: Thursday, January 23, 2020 2:26 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Re: Wedgeworth School and Residential Project

January 15, 2019

Mr. Mark Hansberger
HLPUSD Director, Facilities
15959 E. Gale Ave.
City of Industry, CA 91716-0002

In response to the Wedgeworth K-8 and Residential Development Project Draft Environmental Impact Report (DEIR), I submit the following comments and questions for your consideration and explanation.

Why were the flyers for the Public Meetings entitled Wedgeworth K-8 School Project Environmental Impact Report (EIR) and the flyer made no mention of the Residential Development Project? R1-1

Has the County Board of Supervisors approved the Residential Development Project? R1-2
Where may I find that information?

The title of this DEIR Wedgeworth K-8 School and Residential Development Project would indicate that this is a joint DEIR for two projects (Phase 1 and Phase 2). While there has been considerable reference to Phase 2 in this DEIR, there has been very little in the way of specifics to adequately inform or answer questions. For example, a recurring statement throughout the DEIR seems to be: "no specific plans for residential development are available." If you are reporting on the Residential Development, you need to provide specific plans and mitigation measures. R1-3
Why are the specific plans for residential development unavailable?

If this is the DEIR for Phase 2, it absolutely should include specifics regarding said project! **Will Phase 2 of the proposed project require it's own DEIR separate from this DEIR? Or are you planning to piggy back the Phase 2 DEIR with the Phase 1 DEIR and call it complete?** Phase 2 has many unanswered questions. R1-4

Table 5.1-9 Lists the Phase 2 Construction activities, duration days, and equipment to be used in proposed residential construction. R1-5
How do you know how many days will be needed for construction if you haven't yet determined the number of residential units that will be proposed?

5. Environmental Analysis states, "The residential component of the project would result in 160 units and would generate an increase in 464 people." R1-6
How was this figure was determined? Averaging 2.9 residents per unit seems unrealistic.

Alternatives to Wedgeworth Project: R1-7
Build a new K-5 school, keep the baseball fields as they are, and eliminate the housing construction. Why is this alternative not a consideration?

5.1-4 AQ-3 R1-8
This reports indicates that water trucks will spray the construction site three times a day.
How do you know three times a day will be adequate?

2. Response to Comments from the DEIR

Shouldn't the construction site be watered a minimum of three times a day or, as much as is required by an independent environmental monitor to control fugitive dust? Some days may require additional watering, i.e., windy days. R1-8

What is the plan for cleaning construction vehicles from construction contamination before traveling through the neighborhood?

HYDROLOGY AND WATER QUALITY
5.5.4.1
"The County will not permit an increase in runoff to the County storm drainage system, nor direct connection to the system." R1-9

The report states storm water will be stored in an underground water retention basin. The water will then eventually pass through perforated steel pipes back into the ground.
Ultimately what does this do to the stability of the soil?

5.8 Transportation:

The study area intersections are purported to be representative of other intersections within the study area that were not analyzed. This study is not taking into account the current residential traffic from the feeder streets such as Ridgepark, Orchard Hill Lane, Countrypark Lane, Gay Park Lane, Lark Tree Way, not to mention the two dozen additional feeder streets. R1-10
How can you extrapolate data from one intersection to another?

There is no allowance in this study for the traffic numbers during the holiday period, typically October thru December when Colima Rd. and Azusa Ave. become extremely impacted. It takes time to study or examine traffic patterns carefully. Vehicle counts over a period of one day is more akin to a survey. How can vehicle counts from just one day, May 14, 2019, be an accurate basis from which to develop and publish a traffic study? R1-11

It should be noted that within the past 20 or so years, due to all of the residential and commercial development in Hacienda Heights, Rowland Heights and the City of Industry, Pepperbrook Way has become an alternate route for people traveling Colima Rd. during a.m. and p.m. commutes. How did your study consider this fact? R1-12

Why weren't the 60 fwy Azusa off-ramps (westbound and eastbound) included in the traffic study? R1-13

The SCAQMD does not require health risk assessments to be conducted for short-term emissions from construction equipment. What about the long-term effects of emissions from idling vehicles in impacted traffic areas? R1-14

Mitigation Measures TRAN-1 - A mitigation measure is proposed for intersection #13 (Azusa Avenue and Pepperbrook Way) but then followed up with: "However, this intersection is not under the jurisdiction of the District, and the implementation cannot be guaranteed." R1-15

A non-binding mitigation measure is not a true mitigation. This does not appear to be a serious effort to address a very serious problem. Do you have an alternate mitigation measure that can actually be implemented?

Water: R1-16
Plan to "store" runoff water on the construction site .. How will you prevent non-storm water from discharging to the ground, offsite, or entering storm drains or watercourses?
Best Management Practices would suggest a system to remove the runoff water from the construction site.

5.7.1 Recreation:
Mitigation Measure REC-1- A mitigation measure is provided; however, it is not "guaranteed." R1-17
In order for this to be an effective mitigation measure the District should commit to a binding offer to assure relocation of the Little League fields that could be displaced by the project. Or better still, keep the Highlander Little League where it is. The Highlander field has become an integral part of our Hacienda Heights culture, providing an invaluable community service. These values are greater than money.
Will the School District pay for the relocation of the little league field to a comparable location with comparable facilities (lights, dugouts, snack shack, etc.)? R1-18

Will the District prepare a "statement of overriding considerations" before it approves the project? R1-19

I would ask that you please acknowledge receipt of this email. Thank you for your time.

Jolene Blanco

On Thu, Jan 23, 2020 at 11:12 AM Mark Hansberger <mhansberger@hlpusd.k12.ca.us> wrote:

R1. Response to Comments from Jolene Blanco, dated January 23, 2020.

R1-1 The community meeting was held to inform the residents of the proposed K-8 School, and focused on issues related to the K-8 School. The Notice of Availability (NOA) that was distributed on December 5, 2019, pursuant to the CEQA Guidelines Section 15087(a) correctly identified the proposed project as the K-8 school and the residential development. The NOA was published in a local newspaper and mailed to the residents within a 500-foot radius of the project site. The content and title of a flyer distributed by the District does not address the adequacy of the DEIR.

R1-2 There are no current plans for residential development, and the County Board of Supervisors has not approved the residential development component of the proposed project. A separate discretionary action will be presented to the County Board of Supervisors when a residential project is proposed. A separate notification will be prepared and distributed in accordance with County requirements, and residents will be notified at a later date when a residential application is proposed and submitted to the County Board of Supervisor for review and approval.

R1-3 Phase 2 of the proposed project has been analyzed in a conceptual level, because there is no specific development plan. Detailed analysis of the residential development is speculative at this time and will be provided when an actual development plan is proposed. The EIR evaluates the residential development as worst-case scenario with up to 160 units and provides mitigation measures.

R1-4 While the District prepared the EIR, which addresses the potential residential development, it does not have approval authority over Phase 2. The County of Los Angeles is responsible for determining the appropriate CEQA document for the approval of the residential portion of the project (Phase 2). As the responsible agency it may use the current EIR or it may determine that additional analysis is needed and may prepare an addendum, a supplement to the current EIR or prepare a subsequent EIR.

R1-5 The DEIR assumed a worst-case scenario of constructing 160 units.

R1-6 As stated in the Initial Study, Section 3.14(a), Population and Housing (Appendix A of the DEIR), the average household size is 2.90 for the unincorporated Los Angeles County based on the Department of Finance (DOF) estimates. The Demographic Research Unit (DRU) of the DOF is designated as the single official source of demographic data for state planning and budgeting and is the appropriate source for estimating population impact.

R1-7 RDEIR Section 7.1.1, Purpose and Scope, explains the foundation and legal requirements for the alternatives analyzed in the EIR. CEQA Guidelines § 15126.6[a] states that reasonable project alternatives are that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the

project[.]" Project objectives are provided in Section 7.1.2, Project Objectives, and building a new K-5 school, keeping the baseball fields as they are, and eliminating the housing construction, as stated by the comment, would only partially meet the project objectives. Moreover, impacts from this alternative would be similar to Alternative 4, New Expanded K-8 School and Four Baseball Fields Retention (Including One Shared Field), an alternative from the RDEIR, except that the school would not be expanded. As with the conclusion of Alternative 4, this alternative would lessen environmental impacts in all areas evaluated in the EIR (air quality, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, recreation, transportation, tribal cultural resources, and utilities and service systems). This alternative would lessen the recreation impact, and no replacement fields construction would be necessary as mitigation. This alternative would also eliminate the significant transportation impact related to VMT for the residential portion of the proposed project, and also eliminate significant LOS traffic impact compared to the proposed project. As stated by the commenter, this alternative is environmentally superior to the proposed project. Consideration of this new alternative would not require recirculation of the RDEIR as it would not result in new significant impact. This alternative will be considered by the Board of Education.

R1-8 The construction emissions were modeled using the California Emissions Estimator Model, Version 2016.3.2, which is the air emissions model recommended by the South Coast Air Quality Management District (South Coast AQMD) and the other air districts. This model was created in conjunction with input from the air districts and has built-in emission rates and assumed control efficiencies for various emissions reduction measures. The modeling program includes the mitigation module that allows users to input various construction-related emissions reduction measures. One of the options included is watering of exposed/disturbed areas, which allows a user to select the watering of a site either two or three times per day. The model assigns a default control efficiency for each option. Per the model, watering three times daily has a default fugitive dust control efficiency of 61 percent. As shown in Table 5.1-14, *Maximum Daily Construction Emissions with Mitigation*, of the DEIR, using CalEEMod, and based on the anticipated construction activities and equipment anticipated for the proposed project, watering three times daily would suffice in reducing onsite particulate matter emissions to below the PM_{10} and $PM_{2.5}$ screening-level LSTs.

In general, projects in the South Coast AQMD jurisdiction must comply with South Coast AQMD Rule 403, Fugitive Dust. This rule sets forth requirements for all projects that result in activities that result in generating fugitive dust, including construction-related activities. The Rule contains requirements pertaining to controlling track-out of dust from vehicles from a project site under Section 403(d)(5), which gives several options that can be implemented. One of the options is using a wheel-washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site (see Section 403(d)(5)(D). South Coast AQMD would be the enforcement agency to ensure that the

proposed project complies with the applicable South Coast AQMD rules. In response to the commenter, Mitigation Measure AQ-3 has been revised as shown below.

The following text has been revised in response to comments received on the DEIR. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

AQ-3 The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas a minimum of three times per day during Phase 1 site preparation activities to minimize fugitive dust and require additional watering as necessary if there is any evidence of wind driven fugitive dust as defined in South Coast Air Quality Management District Rule 403(c)(36) (i.e., "visible emissions from any disturbed surface area which is generated by wind action alone"). In addition, the District shall also specify in the construction bid contract that the construction contractor(s) shall post visible signage that contains the South Coast AQMD complaint hotline telephone number in addition to the contact information for a District representative to report any complaints related to project construction activities. These signs shall be placed on the outer side of the construction areas or in such areas that are plainly visible to the public. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.

R1-9 The on-site soils are fine grained (silty clays) and have low percolation rates for infiltration systems. The stormwater detention system to be constructed underneath the soccer field would be designed so that the rate at which the collected water seeps into the soil would not adversely impact the stability of the soil. The system is sized to handle a 50-year design storm, as required by the County. Although minor settlement (less than 0.5 inch) may occur over time in the alluvial soils directly below the stormwater retention system as a result of stormwater infiltration and percolation, the use of permeable gravel materials for subgrade support and geosynthetic filter fabrics and geotextile in the design of the stormwater retention system would mitigate potential ground settlement to less than significant levels and improve soil stability.

R1-10 The traffic impact analysis evaluated critical roadways that provide reginal mobility in the region and carry high traffic volumes. Due to the high traffic volumes, these types of roads are of primary concern from a roadway capacity standpoint. However, local roads such as Wedgeworth Drive, Pepper Brook Way, and other streets in the vicinity of the school are low-volume and low-speed roads that do not carry large volumes of traffic and do not have capacity constraints. School traffic would cause a temporary traffic increase in these roads, but these increases only occur for two short periods in the day and would not result in an impact to the circulation system.

2. Response to Comments from the DEIR

R1-11 Traffic numbers during the holiday period as suggested by the comment do not represent a typical school day setting for traffic analysis. The traffic study was prepared following the County of Los Angeles and the City of Industry requirements. It is generally acceptable to conduct traffic counts for one day to prepare a traffic study unless there are extenuating circumstances to conduct surveys on multiple days and seasons. Holiday traffic during from October through December, which is seasonal, would not be an extenuating circumstance for a typical school traffic because it would not generally coincide with the school's start and dismissal times. Schools would also be on holidays during the last week of November and last two weeks of December. There is no compelling reason for this project to conduct multiple traffic counts in addition to the requirements of the County and the City of Industry guidelines for conducting a traffic study.

R1-12 The traffic impact study relied on traffic counts in 2019 as baseline conditions, but also added cumulative traffic volumes in the buildout analysis, thereby accounting for the current and future traffic volumes in the traffic study area, including along Pepperbrook Way.

R1-13 Based on anticipated origins and destinations for the school portion of the proposed project, the school-related traffic would very minimally access the SR-60 freeway. The anticipated origins were assumed based on the existing Wedgeworth ES attendance boundary and the destination would be the project site. Similarly, given the likely routes in the area for residential development, the residential portion of the proposed project did not meet the criteria to include an evaluation of traffic impacts at the SR-60 ramps. The likely routes are shown in Figure 6, School Inbound Trip Distribution, of the updated traffic study included as Appendix F to the RDEIR. The California Department of Transportation also stated that they do not expect the proposed project to result in a direct adverse impact to the existing Caltrans facilities.

R1-14 Long-term air quality impacts are addressed in the DEIR Section 5.1.4.2, Air Quality, Impact 5.1-5, which reviewed the long-term operational impact from elevated pollutant concentrations. Mobile sources account for the majority of CO emissions. As discussed in subheading "CO Hotspots," under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact. The proposed project is anticipated to generate 522 new AM peak hour vehicle trip, which is minimal compared to the screening levels of increasing traffic volumes at a single intersection by more than 44,000 vehicles per hour. Therefore, implementation of the proposed project would not generate substantial CO emissions to create significant health risk from idling vehicles.

R1-15 Mitigation Measure TRAN-1 reduces potential impacts to a less than significant level. However, as stated, the District does not have the authority to implement the

recommended mitigation; therefore, the impact was declared significant and unavoidable. The District cannot guarantee the mitigation because the impacted intersections are not under the jurisdiction of the District. No other feasible alternative mitigation measure was recommended.

Additionally, it should be noted that on December 28, 2018, the California Natural Resources Agency adopted revised CEQA Guidelines. Among the changes to the guidelines was the removal of vehicle delay and LOS from consideration under CEQA. With the adopted guidelines, transportation impacts are to be evaluated based on a project's effect on vehicle miles traveled. Lead agencies are allowed to opt into the revised transportation guidelines, but the new guidelines must be used starting July 1, 2020. Subsequently in January 2020, State courts stated that under section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects. Therefore, pursuant to this recent court decision, although the proposed project will result in level of service (LOS) delays, the traffic impacts would not be considered a significant impact on the environment.

R1-16 Runoff water would not be stored during construction. The proposed project is required to and will obtain a Construction General Permit (CGP) and implement best management practices contained in the Storm Water Pollution Prevention Plan (SWPPP) prior to any grading so that pollutants in nonstorm water during construction (e.g., sediment, nutrients, trash, metals) are effectively managed and do not discharge off-site or enter storm drains or watercourses. As stated in the DEIR, the SWPPP must list best management practices (BMP) implemented on the construction site to protect stormwater runoff and must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented based on the risk level of the site; and inspection, reporting, training, and recordkeeping requirements. In the Los Angeles region, the SWRCB is the permitting agency and the Los Angeles RWQCB provides local oversight and enforcement.

R1-17 The District recirculated Section 5.7, Recreation, of the DEIR to incorporate a mitigation measure to provide four replacement ballfields in two District-owned sites. Mitigation Measures REC-1 and REC-2 are feasible and fully mitigate impact from the displacement of four baseball fields.

R1-18 The District is committed to providing replacement baseball fields at two school sites (Kwis ES and Cedarlane Academy). Financial responsibility of providing replacement fields is not under the purview of CEQA analysis. No further response is necessary.

2. Response to Comments from the DEIR

R1-19 A statement of overriding considerations (SOC) will be prepared and adopted with the approval of the project once the FEIR is certified. However, it should be noted that the SOC will be for the significant and unavoidable impacts related to transportation only.

In January 2020, State courts stated that under Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects. Therefore, consistent with this recent court decision, although the proposed project would result in LOS delays at one traffic study intersection (#13 Azusa Avenue at Pepper Brook Way), this LOS-related impact would not be considered a significant impact on the environment. However, in order to disclose the full impact of the project, the District found the LOS impact to be significant and unavoidable in the RDEIR.

LETTER R2 – Vickie Chang (1 page)

R2

-----Original Message-----
From: Vickie Chang <[redacted]
Sent: Sunday, January 19, 2020 5:51 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <aduarte@hlpusd.k12.ca.us>; Joseph K Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Wedgeworth Elementary school K-8 project

Dear Mr. Hansburger, Board Members and Superintendent,

As Wedgeworth Elementary School parents and Hacienda Heights residents, we would encourage all of you to continue to support Wedgeworth K8 school project. R2-1

To begin, we would like to acknowledge one of the concerns expressed by the community regarding increase in traffic flow during the project development. As we agree that it will be the case, we also understand this will be temporary.

Upon the completion of the the school, the traffic situation will be quite the contrary. The plan includes ample staff parking space, and a much needed student dropoff and pickup zone.

We, therefore, consider that the overall traffic impact is minimal, and it should not be an obstacle in the completion of the Wedgeworth K-8 project.

Second, it is important to make a clear distinction between recreational activities offered by non-profit organizations in the community and political activities. R2-2

Supervisor Janice Hahn and the LA County 4th District office offered a generous financial support in the amount of $1.5 million to the Hacienda Heights Little League for rebuilding the fields. The amount is deemed insufficient by the League's representatives.

The $1.5 million grant is actually community tax money, and we want to make sure our tax dollars are used to fund positive impact in the community whether it is for educational or recreational purposes.

The board of education of HLPUSD should therefore seek to correct this situation. Otherwise, Hacienda Heights residents will not welcome a sport organization heavily involved in political activities. This will cause unfair treatment and division within the community.

Once again, we thank you very much for your continuous support. We are looking forward to the completion of the Wedgeworth K8 school.

Best regards,
YuChi Chang

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2. Response to Comments from the DEIR

R2. Response to Comments from Vickie Chang, dated January 19, 2020.

R2-1 Comments support the proposed project and acknowledge that the traffic and parking impacts would be less than significant. No further response is necessary. Comments are noted and will be provided to the Board of Education for consideration.

R2-2 Comments are related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and they do not address any physical environmental impact or adequacy of the DEIR. No further response is necessary. Comments are noted and will be provided to the Board of Education for consideration.

LETTER R3 – Yuchi Chang (1 page)

R3

-----Original Message-----
From: Vickie Chang <[redacted]
Sent: Friday, January 17, 2020 11:03 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Please support Wedgeworth K-8 school project

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R3-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R3-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R3-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,

YuChi Chang

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2. Response to Comments from the DEIR

R3. Response to Comments from Yuchi Chang, dated January 17, 2020.

R3-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no further response is necessary.

R3-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No further response is necessary. Comments are noted and will be provided to the Board of Education.

R3-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No further response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R4 – Angeline Chen (1 page)

R4

-----Original Message-----
From: Angeline Chen [redacted]
Sent: Saturday, January 18, 2020 12:08 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Letter regarding Wedgeworth K8

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R4-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R4-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R4-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,

*Angeline

Sent from my iPhone

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2. Response to Comments from the DEIR

R4. Response to Comments from Angeline Chen, dated January 18, 2020.

R4-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments on the DEIR were provided, and no response is necessary.

R4-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R4-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R5 – Dan Chen (1 page)

R5

From: Dan [redacted]
Sent: Wednesday, January 22, 2020 10:10 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>, Anthony Duarte <aduarte@hlpusd.k12.ca.us>, Joseph K. Chang <jkchang@hlpusd.k12.ca.us>, Erin Swol <eswol@hlpusd.k12.ca.us>, mgmentrasio88@gmail.com, Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>, Annie N. Bui <annlebui@hlpusd.k12.ca.us>
Subject: Wedgeworth

Dear Mr. Hansberger, Interim Superintendent, and Respected Board Members,

As residents and parents of Wedgeworth elementary, we sincerely hope you will continue supporting the K-8 school project. We understand while there may be some inconvenience, such as pick-up/drop-off traffic congestion, during construction, we believe the inconvenience will only be temporary. Once the school is built, there will be ample parking spaces, which will, in the long run, reduce the current congestion by rerouting the traffic into the drop off loop, which will feature a pick-up loop as well. These parking spaces can also will also benefit the community's need for additional parking when necessary. R5-1

In addition to traffic issues, we appreciate the $1.5 million provided by supervisor Janice Hahn to Hacienda Heights Little League to help alleviate concerns they raised pursuant to the project. Her gesture was very generous. While we acknowledge that the Little League had no formal entitlement to the area they were using, we are hopeful that this gesture will resolve any opposition they may have previously voiced. R5-2

Finally, we would to note that while or children may not necessarily receive the immediate benefits of a school that is will be years from completion, we, as a community have been looking forward to rebuilding the Wedgeworth campus for over 50 years collectively, and are happy to contribute our efforts for the benefit of the kids who will enjoy the fruits of our efforts. We look forward to bringing this project to fruition and appreciate your continued support and approval. R5-3

danchen

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发自我的iPhone

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2. Response to Comments from the DEIR

R5. Response to Comments from Dan Chen, dated January 22, 2020.

R5-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R5-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R5-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R6 – YeeKi Cho (1 page)

R6

-----Original Message-----
From: Ki Cho [redacted]
Sent: Friday, January 17, 2020 9:17 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: RE:

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R6-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R6-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R6-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,
Yeekicho
Sent from my iPhone

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2. Response to Comments from the DEIR

R6. Response to Comments YeeKi Cho, dated January 17, 2020.

R6-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R6-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R6-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R7 – Zona Don (1 page)

R7

From: 林育如 <[redacted]>
Sent: Friday, January 17, 2020 11:09 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Letter from Wedgeworth parent

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting the Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, the same solution with the pickup process. These parking spaces can also be opened to the public when needed. We believe traffic issues can be solved by multiple solutions. R7-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R7-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these processes and to witness this great plan come to reality, and this needs your full support and approval. R7-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students, and the community.

Sincerely.,
Zona Don

2. Response to Comments from the DEIR

R7. Response to Comments from Zona Don, dated January 17, 2020.

R7-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R7-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R7-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R8 – Derick Fan (2 pages)

R8

From: Derick Fan [redacted]
Sent: Tuesday, January 21, 2020 11:47 PM
To: Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Wedgeworth, future for HH children

Dear Mr. Hansburger, Board Members and Superintendent,

As Wedgeworth Elementary School parents and Hacienda Heights residents, we would encourage all of you to continue to support Wedgeworth K8 school project.

To begin, we would like to acknowledge one of the concerns expressed by the community regarding increase in traffic flow during the project development. As we agree that it way be the case, we also understand this will be temporary. R8-1

Upon the completion of the the school, the traffic situation will be quite the contrary. The plan includes ample staff parking space, and a much needed student dropoff and pickup zone.

We, therefore, consider that the overall traffic impact is minimal, and it should not be an obstacle in the completion of the Wedgeworth K8 project.

Second, it is important to make a clear distinction between recreational activities offered by non-profit organizations in the community and political activities. R8-2

Supervisor Janice Hahn and the LA County 4th District office offered a generous financial support in the amount of $1.5 million to the Hacienda Heights Little League for rebuilding the fields. The amount is deemed insufficient by the League's representatives.

The $1.5 million grant is actually community tax money, and we want to make sure our tax dollars are used to fund positive impact in the community whether it is for educational or recreational purposes.

The board of education of HLPUSD should therefore seek to correct this situation. Otherwise, Hacienda Heights residents will not welcome a sport organization heavily involved in political activities. This will cause unfair treatment and division within the community.

Once again, we thank you very much for your continuous support. We are looking forward to the completion of the Wedgeworth K8 school.

2. Response to Comments from the DEIR

Derick

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R8. Response to Comments from Derick Fan, dated January 21, 2020.

R8-1 The comment asserts that the traffic impact would be temporary and would not be significant. It does not address the adequacy of the DEIR, and no response is necessary.

R8-2 Comments are related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and they do not address any physical environmental impact or adequacy of the DEIR. No further response is necessary. Comments are noted and will be provided to the Board of Education for consideration.

2. Response to Comments from the DEIR

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LETTER R9 – Ivory Fan (1 page)

R9

-----Original Message-----
From: ivory fan [redacted]
Sent: Friday, January 17, 2020 11:13 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Cc: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>
Subject: Dear Mr. Hansberger, interim superintendent, and respected board members,

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R9-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R9-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R9-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely,

ivoryfan

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2. Response to Comments from the DEIR

R9. Response to Comments from Ivory Fan, dated January 17, 2020.

R9-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R9-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R9-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R10 – Cindy Greenup (1 page)

R10

January 21, 2020

Mr. Mark Hansberger
Interim Executive Director, Business Services
Hacienda La Puente Unified School District
15959 E. Gale Ave
City of Industry, CA 91745

Mr. Hansberger,

In reviewing the Draft EIR for the Wedgeworth project, I would like to comment regarding the traffic study and highlight areas that were not addressed, yet I believe deserve consideration.

While it may not be part of the main ingress and egress of the Wedgeworth property, Ember Glen Rd is impacted on a daily basis by traffic travelling to and from that area. I live on Ember Glen Rd, and have experienced traffic travelling in excess of the 25 mph posted speed limit during the morning and afternoon hours when school is starting and ending. Ember Glen Rd is used as a cut through between Halliburton and Countrywood by people in an attempt to avoid traffic on Countrywood. My driveway is located on Ember Glen where there is a slight curve and rise in the road, making it difficult to see oncoming cars; over the years we have learned to be extra cautious when pulling out of our driveway. Unfortunately, with cars exceeding the posted 25 mph speed limit, what looks clear when we begin pulling out quickly ends up with us narrowly missing a traffic accident. The speeding cars try to go around us and have on occasion hit parked cars, a neighbor's car has been hit while pulling out of their driveway. We also witnessed a neighbor's pet get hit by a car speeding through the neighborhood in the morning. R10-1

Increasing the capacity of a school and adding 160 housing units in that area is only going to make the traffic worse in an area that has been overlooked in the scope of the project.

I would like to see some attention paid to this neighborhood and the impact this project is going to have on it. One possible solution that might help alleviate the situation would be the installation of traffic calmers along the route used to cut between Halliburton and Countrywood.

Sincerely,

Cindy Greenup

Cindy Greenup
16540 Ember Glen Rd
Hacienda Heights, CA 91745

2. Response to Comments from the DEIR

R10. Response to Comments from Cindy Greenup, dated January 21, 2020.

R10-1 Comments assert that although Ember Glen Road is not the main ingress and egress of the proposed project, it will be heavily impacted by the proposed project, as it is used as a cut-through between Halliburton and Countrywood by people in an attempt to avoid traffic on Countrywood. The traffic impact study evaluated critical roadways that provide reginal mobility in the region and carry high traffic volumes. Due to their high traffic volumes, these types of roads are of primary concern from a roadway capacity standpoint. Other streets in the vicinity of the project site, such as Ember Glen Road, are low-volume and low-speed roads that do not carry large volumes of traffic, and do not have capacity constraints. School traffic would cause a temporary traffic increase, but these increases only occur for two short periods in the day and would not result in a significant impact to the circulation system.

LETTER R11 – Jennie (2 pages)

R11

From: Cat usa [redacted]
Sent: Tuesday, January 21, 2020 3:59 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Please continue supporting Wedgeworth K8 school project

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R11-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R11-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R11-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

2. Response to Comments from the DEIR

Sincerely,
Jennie

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R11. Response to Comments from Jennie, dated January 21, 2020.

R11-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R11-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R11-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

2. Response to Comments from the DEIR

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LETTER R12 – Jenny (2 pages)

R12

From: armano usa <[redacted]
Sent: Tuesday, January 21, 2020 11:09 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Please continue supporting Wedgeworth K8 school project

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R12-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R12-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R12-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

2. Response to Comments from the DEIR

Sincerely.,

Jenny

No trees were killed in the sending of this message, however a large number of electrons were terribly inconvenienced.

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R12. Response to Comments from Jenny, dated January 21, 2020.

R12-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R12-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R12-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

2. Response to Comments from the DEIR

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LETTER R13 – Sue Kovall (2 page)

R13

From: Sekovall [redacted]
Mime-Version: 1.0 (1.0)
Date: Tue, 21 Jan 2020 16:16:59 -0800
Subject: DEIR. Please respond that you received this
Message-Id: <5C9D1E87-D982-4A80-A1C0-8BE3A203B6BE@aol.com>
To: mhamberger@HLPUSD.k12.ca.us
X-Mailer: iPad Mail (17C54)
References: <5C9D1E87-D982-4A80-A1C0-8BE3A203B6BE.ref@aol.com>
Content-Length: 3417

This is in response to the DEIR for the Wedgeworth project.

There has been negligence in forming this report. **R13-1**
The mitigation responses to the traffic at Azusa/Pepperbrook is unbelievable=
..
There are 2 lanes going East and you propose that the left lane be a left tu=
rn lane which it already is. But the right lane you mitigate could become a l=
eft/straight and right turn lane. No one would ever get out of the area whil=
e waiting for those turning left.
The proposed East bound change is to make it no turn on red. The back up in t=
raffic would be horrific. Who came up with these ideas **R13-2**
The traffic study itself was done MAY thru August. How does this come anywhe=
re near a study of traffic in regards to a school.
The study being done, it neglected to address any form of traffic on the str=
eets where this school resides.
Both of these things w ere done it appears,to Diminish what one sees as bein=
g of significant concern.
The traffic on Wedgeworth Dr needs to To be monitored at Eagle Park, Park L=
awn,Lark Tree Way , Orchard Hill, Manor Gate and Park Ridge.
The traffic On Pepperbrook needs to be monitored on at Park Lawn, Orchard H=
ill , Manor Gate, and Wedgeworth Dr.
The traffic impact is already huge with the increase in student population a=
t Wedgeworth School.

2. Response to Comments from the DEIR

Traffic violations are frequent in these areas. Peoples property has been da=
maged (mail boxes) and homeowners cannot get out of their driveways..
The gas emissions has increases which should be a concern for the students a=
s well as the community right there by the school. The cars are coming from f=
ar away so have the on and off ramps of the 60 freeway been monitored. The i=
ncrease in traffic and emissions won=E2=80=99t bother all of these people tr=
aveling from outside the HLPUSD area. R13-3

They also will not be paying taxes on the Bond voted on which we in the dist=
rict do currently pay increased taxes. R13-4

The noise , dirt and dust concern me greatly. This is a drought area. We are=
trying to save water but the dirt and dust will be great. Hosing down the d=
irt 3x a day wasteful and ineffective. My home is directly across the stree=
t from the proposed project. I have a pet, a white fence, a blding structure=
and jacuzzi . The noise will be never ending during planned construction . T=
he wall planned to decrease noise for the students, seems to go right throug=
h the Kindergarten. What do you plan to do with the new Kindergarten area. M=
ove it ? At a greater cost? R13-5

Then there is the plan to have construction going on from 7am -7pm 6 days a w=
eek. You Can=E2=80=99t allow that amount of exposure to us . R13-6

The alternative plans are faulty as well. IT jumps from no school, Little le=
ague stays and no property is sold, directly into a K-5 but the LL is still g=
one and property is still sold.
THE ALTERNATIVE TO HAVE A K-5 , KEEP THE LITTLE LEAGUE, REDRAW THE PLANS TO P=
UT THE RECREATION AREA WHERE THE CURRENT SCHOOL IS,AND NO SALE OF PROPERTY. W=
HY IS THIS NOT ON YOUR LIST. Saving the Little League also moves the problem=
of the freeway emissions back further the 500 Ft. R13-7

I hope that the board reads the complete EIR and sees how negligent and absu=
rd those who created and responded to it are. The EIR needs to be rejected a=
nd a more thorough and honest group. Be hired. Second looks all away around a=
re needed.=20 R13-8

Thank you
Sue Kovall
1501 Lark Tree. Way
HH
Sent from my iPad=

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R13. Response to Comments from Sue Kovall, dated January 21, 2020.

R13-1 The comment is correct in stating that there are two lanes going east at Azusa/Pepper Brook intersection. Appendix F, Proposed Project TIA, of the RDEIR shows the existing lane configuration that reflects this one left turn lane and one thru and right turn lane. The mitigation measure is not just to restripe the approach with one left-turn and one shared-left/thru/right-turn lane, but also to modify the signalized phasing for the eastbound and westbound approach to split phase, and to prohibit right turns on red at the westbound approach to avoid conflicts with vehicles making eastbound left-turns into Azusa Avenue.

The RDEIR provided a mitigation measure to reduce the potentially significant impact at the Azusa Avenue and Pepper Brook Way intersection, and the RDEIR also found this impact to be significant and unavoidable because implementation of this mitigation measure cannot be guaranteed.

It should be noted that pursuant to the recent changes in CEQA Guidelines and subsequent court decision, traffic delays at intersections measured in level of service (LOS) or similar measures of vehicular capacity or traffic congestion are no longer considered a significant impact on the environment. In January 2020, State courts stated that under Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

Therefore, consistent with this recent court decision, although the proposed project would result in LOS delays at #13 Azusa Avenue at Pepper Brook Way, this LOS-related impact is no longer considered a significant impact. However, in order to disclose the project impact and the District's commitment to mitigate the school's impact, the RDEIR determined the LOS impact to be significant and unavoidable, and the District will coordinate with the County to mitigate the traffic impact.

R13-2 The traffic study collected traffic counts on Tuesday, May 14, 2019, during AM and PM peak hours. The traffic study followed standard traffic count methodology and is adequate to extrapolate traffic impact from the traffic count. The traffic study was prepared following the County of Los Angeles and the City of Industry requirements. It is generally acceptable to conduct traffic counts for one day to prepare a traffic study unless there are extenuating circumstances to conduct surveys on multiple days or at every traffic intersection or segment. No extenuating circumstances have been identified.

R13-3 The described traffic congestion conditions are existing, and the proposed project would temporarily increase traffic for two short periods on weekdays from about 30 minutes before 8 am and from 1:45 pm to 2:15 pm. The impacts would not be considered significant to the area circulation system.

2. Response to Comments from the DEIR

The greenhouse gas (GHG) impacts have been evaluated in DEIR Section 5.4, Greenhouse Gas Emissions, and other mobile source air quality impacts have been evaluated in Section 5.1, Air Quality, and impacts were found to be less than significant. The gas emissions would not result in significant impact to the community. The proposed K-8 school would serve the students in the District attendance boundary, and approximately 17 percent (144 students) of the students are anticipated to travel from outside the District boundaries. The proposed project is not anticipated to use the SR-60 freeway as its main access roadway, and given the likely routes available in the area, the SR-60 off ramps did not meet the criteria to be evaluated as part of the traffic study.

R13-4 The comment pertaining to payment of taxes on the bond is not a physical impact to be analyzed in the EIR.

R13-5 The comment stating that hosing down the dirt three times a day is wasteful and ineffective is an opinion without any substantial evidence. The proposed project is required to comply with South Coast AQMD Rule 403, Fugitive Dust. This rule sets forth requirements for all projects with activities that result in fugitive dust, including watering exposed ground to reduce impacts from fugitive dust. In order to further reduce impacts from fugitive dust, Mitigation Measure AQ-3 has been revised as follows. The following text has been revised in response to comments received on the DEIR. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

AQ-3 The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas a minimum of three times per day during Phase 1 site preparation activities to minimize fugitive dust and require additional watering as necessary if there is any evidence of wind driven fugitive dust as defined in South Coast Air Quality Management District Rule 403(c)(36) (i.e., "visible emissions from any disturbed surface area which is generated by wind action alone"). In addition, the District shall also specify in the construction bid contract that the construction contractor(s) shall post visible signage that contains the South Coast AQMD complaint hotline telephone number in addition to the contact information for a District representative to report any complaints related to project construction activities. These signs shall be placed on the outer side of the construction areas or in such areas that are plainly visible to the public. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.

Noise during construction will be increased. However, temporary noise barriers, as specified in Mitigation Measure N-1, are also required so that the noise levels at the

property line of nearby residences are below the performance standard of 60 dBA, as required by the County standard for single-family residential uses.

The temporary noise barrier will be designed to break the line-of-sight between noise sources and sensitive receptors. The noise barrier is proposed along the Phase 1 boundaries and the existing structures within the Phase 1 boundaries will be demolished. If structures are standing at the time of noise barrier construction, the noise barrier will be erected so that there are no gaps between the structure and the noise barrier, so that the structure can act as part of the noise barrier, breaking the line-of-sight.

R13-6 The County of Los Angeles limits construction activities to the hours of 7 am to 7 pm on weekdays and Saturdays. Although construction impacts would occur, the District would comply with the existing regulation and allowable standards. Mitigation Measure N-1 also requires that at least 10 days prior to the start of construction activities, a sign is to be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.

R13-7 The project alternatives were selected based on the criteria pursuant to Section 15126.6 of the CEQA Guidelines as stated in Chapter 7 of the RDEIR. The alternative suggested by the comment (i.e., construct new K-5 school, keep the baseball fields, provide new recreation area where the current K-5 school is) does not meet project objectives. The range of alternatives required in an EIR is governed by a "rule of reason," and the suggested alternative is very similar to Alternative 4 of the RDEIR except that the school is not expanded and a new recreation area is not created. As with the conclusion for Alternative 4, this alternative would lessen environmental impacts in all areas evaluated in the EIR (air quality, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, recreation, transportation, tribal cultural resources, and utilities and service systems). This alternative would lessen the recreation impact, and no replacement fields construction would be necessary as mitigation. This alternative would also eliminate the significant transportation impact related to VMT for the residential portion of the proposed project, and the significant LOS traffic impact compared to the proposed project. As stated by the commenter, this alternative is environmentally superior to the proposed project. Consideration of this new alternative would not require recirculation of the RDEIR as it would not result in new significant impact. This alternative will be considered by the Board of Education.

R13-8 The comments are noted and will be forwarded to the District Board of Supervisor for review and consideration. No further response is necessary.

2. Response to Comments from the DEIR

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LETTER R14 – Alex Kuo (1 page)

R14

From: Alex Kuo <[redacted]
Sent: Wednesday, January 22, 2020 10:36 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Wedgeworth Neighbor

Dear Mr. Hansberger,

I moved across the street so my kids can attend wedgeworth. It was a hard 5 years of saving and toiling through 2, sometimes 3, jobs. I gladly did it so my kids can have a solid foundation when entering the world of tomorrow. I hope you support giving the kids an actual foundation to study and grow. R14-1

On a more personal note, this past raining season, I witnessed my 5 year old daughter out in the cold in the morning field waiting for class to start; there are no buildings to block wind. I donated ponchos because teachers and misc. faculty are walking with umbrellas escorting 5 year olds to the cafeteria in the rain between trailers.

--
Alex K.
[redacted]

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2. Response to Comments from the DEIR

R14. Response to Comments from Alex Kuo, dated January 22, 2020.

R14-1 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R15 – Vivian Kuo (2 pages)

R15

From: Vivian Kuo [redacted]
Sent: Monday, January 20, 2020 2:08 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Martin Medrano <mamedrano@hlpusd.k12.ca.us>; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Feedback on Wedgeworth K-8 Project

Dear Mr. Hansburger, Board Members and Superintendent:

As Wedgeworth Elementary School parents and Hacienda Heights residents, we would encourage all of you to continue to support Wedgeworth K8 school project.

To begin, we would like to acknowledge one of the concerns expressed by the community regarding increase in traffic flow during the project development. AS we agree that it may be the case, we also understand this will be temporary. R15-1

Upon the completion of the school, the traffic situation will be quite the contrary. The plan includes ample staff parking spaces, and much needed student drop off and pick up zone.

We, therefore, consider that the overall traffic impact is minimal, and it should not be an obstacle in the completion of the Wedgeworth K8 project.

Second, it is important to make clear distinction between recreational activities offered by non-profit organizations in the community and political activities. R15-2

Supervisor Janice Hahn and the LA County 4th District office offered a generous financial support in the amount of $1.5 million to the HLPUSD to build a new baseball field to help Hacienda Heights Little League relocate. Surprisingly this amount is deemed insufficient by the League's representatives.

The 1.5 million grant is actually community tax money, and we want to make sure our tax dollars are used to fund positive impact in the community whether it is for educational or recreational purposes.

As much as I understand some community members emotional attachment to Hacienda Heights Little League playing on the current fields, the current leadership of the league has demonstrated poor sportsmanship, unappreciative, and created division in the community.

2. Response to Comments from the DEIR

I do support youth recreational sports and my kids are involved in some. However, everyone must understand that neither HLPUSD nor the LA County is obligated to sponsor any recreational sports. The fact that the LA County and HLPUSD agree to help Little League relocate, they should be appreciative instead of resentful.

The board of education of HLPUSD should therefore seek to correct this situation. Hacienda Heights residents will not welcome a sport organization heavily involved in political activities and entitled to unfair treatment.

Once again, we thank you very much for your continuous support. We are looking forward to the completion of the Wedgeworth K8 school.

Sincerely,
Vivian Kuo
Wedgeworth Parent
Wilson Alumni

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R15. Response to Comments from Vivian Kuo, dated January 20, 2020.

R15-1 The comment indicates that the overall traffic impact would be minimal and should not be an obstacle to the proposed project. The comment is acknowledged, and no response is necessary.

R15-2 The comment pertains to the financial support offered by the Supervisor Janice Hahn and the LA County 4th District Office. The comment expresses an opinion and is not specific to the content of the DEIR. The comment is noted and will be provided to the Board of Education for consideration.

2. Response to Comments from the DEIR

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LETTER R16 – Ming Lai (5 pages)

R16

17102 Ridge Park Dr
Hacienda Heights CA 91745-3848
January 17, 2020

Hacienda La Puente Unified School District
Mark Hansberger, Director, Facilities Projects
15959 E Gale Ave
City of Industry CA 91716-0002
Hand Delivered

Dear Mr Hansberger:

This letter is to comment on the traffic impact and the project objectives/alternatives of the Wedgeworth K-8 School and Residential Development Project proposed by the Hacienda La Puente Unified School District (HLPUSD) in response to the draft environment impact report (DEIR), dated December 2019, as published on HLPUSD's web site.

Transportation

Whereas many residents already complained about the current traffic situation surrounding the school, in the public meetings organized by HLPUSD, for example, I would like to focus on one single intersection, at Pepper Brook Way and Wedgeworth Dr, which is close to the Azusa Ave x Pepper Brook Way intersection and my home. (DEIR Sec 6.2 concluded that the project would have a "significant unavoidable adverse [traffic] impact" on the Azusa Ave and Pepper Brook Way intersection, and that "the proposed project could conflict with a program, plan, ordinance or policy addressing the circulation system, ..." as a result.) The Pepper Brook x Wedgeworth intersection is a 4-way intersection, not controlled by any traffic signal; its east-west cross street is Pepper Brook, its north side is the east end of Wedgeworth Dr, and its south side is an entrance/exit to/from the Hacienda Center outdoor shopping mall, which is anchored by 99 Ranch Market and 14 restaurants, among others. The traffic at this intersection is not studied in the DEIR. There are two entrances/exits to/from the mall from/to Pepper Brook; one is right next to Bank of America in the mall, closer to Azusa Ave, another is next to 99 Ranch Market, a bit west from the BoA entrance/exit (see attached maps). And I am mainly talking about the latter one, which directly leads to Wedgeworth Dr. If one needs to get to Freeway 60 from the mall, these exits are the way to go. If one wants to get to east bound Colima Rd, one is also likely to use them to make a right turn into south bound Azusa Ave first, because there is usually a long line, that is hard to cut into, in the left turn lanes on Azusa into Colima. As said in DEIR Sec 5.8.1, the Azusa x Pepper Brook intersection currently is already graded D ("fair", "generally results in noticeable congestion"); therefore, thanks to the traffic overflow therefrom, the Pepper Brook x Wedgeworth intersection is often congested. I am not a traffic engineer; I am not able to produce those volume-to-capacity (V/C), level of service (LOS) numbers, for example. I can only attach some photos I took to visually illustrate the situation. I do not know whether these real-life scenarios are consistent or inconsistent with the numbers in the DEIR, but I hope these photos are more illustrative than cold numbers and convince HLPUSD that traffic at the Pepper Brook x Wedgeworth intersection is pretty undesirable at present. With the new school and the increased enrollment, plus the new apartments, one can imagine that the

R16-1

2. Response to Comments from the DEIR

situation would worsen significantly. Traffic congestion is no just a congestion issue; it is a safety issue as well: When people are impatient, they tend to do something unsafe. A couple weeks ago I saw someone exited Hacienda Center using the entrance lane, going directly into Wedgeworth Dr, apparently because he/she had had enough waiting in the exit lane, which was backed up because the traffic on the eastbound lane on Pepper Brook was backed up. In my opinion, the Pepper Brook x Wedgeworth intersection is busier and more dangerous than, say, the Colima x Halliburton intersection. But both Pepper Brook Way and Wedgeworth Dr are classified by the Calif Highway System Map, as said in DEIR Sec 5.8.1.3, as "local streets", and Colima Rd and Halliburton Rd are "other principal arterial" and "minor arterial" respectively. Pepper Brook was not designed to handle so much traffic and should not be like this. With the expanded school and the apartments, the situation will definitely be even worse. R16-2

One may argue that my evidence was not collected scientifically. But I live in the neighborhood and drive around here day in and day out. On the other hand, the traffic numbers in the DEIR was collected in one single day – May 14, 2019, as said in DEIR Sec 5.8.1.4. One day's data may not be representative; the sample size is too small. In addition, the DEIR seems to study only the so-called peak hour traffic – 7 to 9 am and 4 to 6 pm on weekdays, per Sec 5.8.1.2. That might give the wrong impression that traffic is at its peak only during those 4 hours. Actually, traffic on eastbound Pepper Brook appears to be pretty congested since around 2pm. Assume that the apartments are built and new residents move in, the traffic impact would not be limited to weekdays. People go out on weekends to dine and shop. There are this Hacienda Center on the west side of Azusa Ave at Pepper Brook, and Puente Hills Mall on the east side. I do not understand why weekend traffic was not studied in the DEIR. Impacts on the environment do not care whether it is a weekday or a weekend. R16-3

The Pepper Brook x Wedgeworth intersection is the only entrance/exit from/to Azusa Ave (and Fwy 60) for residents living at Shady Meadow Dr, Elklane Dr, Cedarmont Dr, Ridge Park Dr, and part of Wedgeworth Dr, unless they drive backward and make a circle around. Frankly I cannot think of any effective way to mitigate the traffic backup there, because it is too close to the Azusa x Pepper Brook intersection. (Some proposed staggering start and end times for schools in that area in order to distribute the traffic; however, Wilson High, Cedarlane, Bixbly Elementary, and Wedgeworth Elementary are all located within half a mile or so on Wedgeworth Dr, and each school already staggers its class times; so I don't see how there can still be room for improvement.) It is foreseeable that the parents as well as the residents in the new apartments would heavily use Pepper Brook Way and further overload it. R16-4

DEIR Sec. 5.8.1.1 lists seven goals (M1 through M7) included in the L A County Mobility Element in the General Plan 2035. According to DEIR Sec. 5.8.1.1, "Goal M4 includes policy M4.7, which presents minimum LOS standards, as follows: Maintain a minimum LOS D, where feasible; however, allow LOS below D on a case by case basis in order to further other General Plan goals and policies ... The Mobility Element was prepared in compliance with the Complete Streets Act of 2008 (Assembly Bill 1358), which requires local jurisdictions to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, ..." My understanding therefore is that it is a legal requirement that a local jurisdiction, presumably such as HLPUSD, needs to plan for a transportation network that meets the needs of all users, taking into consideration M4.7, among other things. As R16-5

mentioned above, the Azusa x Pepper Brook intersection currently is already graded D, per DEIR Sec 5.8.1, and it is expected to be worse after the project, per DEIR Tables 5.8.7 through 5.8.10. I don't see how a more congested intersection would meet the needs of road users; I don't see in the DEIR how HLPUSD is planning for it (as said in DEIR, the intersection is under the jurisdiction of L A County and Industry, HLPUSD cannot do anything about it). I also don't see in the DEIR how HLPUSD would justify the adverse impact on this intersection by arguing that the project would further other General Plan goals. R16-5

Project objectives/alternatives

DEIR Sec 3.2 lists four objectives of this project, in some 70 words:

1. Replace Wedgeworth Elementary School, built as a temporary facility and now in poor condition, with a modern, educationally appropriate campus for 1,200 K-8 students.
2. Avoid the need to move students off-site during construction by maintaining the existing campus until the new campus opens.
3. Demolish the existing campus.
4. Create value by seeking rezoning of the remaining property to R-3 (Limited Multiple Residence), which would provide a maximum of 160 dwelling units. R16-6

There is no elaboration and support for these objectives at all. I don't know how these objectives are formulated. It is hard to believe that the goals of a project, whose construction cost is said to be around $52 million, are only "explained" in four sentences. The explanation of these objectives is totally inadequate. The project alternatives in DEIR Sec 7 are developed and evaluated based on these objectives. If the objectives are not well formulated, the project alternatives cannot be properly developed and evaluated. The objectives stated seem to be arbitrary. Per DEIR Sec 3.2, the objectives "will aid decision makers in their reviews of the project and associated environment impacts." If the objectives are poorly drawn up, then the decision makers will not be well guided in their review.

Objective 1 is to replace Wedgeworth with an "educationally appropriate campus for 1,200 K-8 students." How/where is "educationally appropriate" defined? If a standard for educational appropriateness exists, I do not see in the DEIR how the proposed project specifically meets this standard. How is the current temporary facility not "educationally appropriate"? There are other HLPUSD schools still using temporary facility; are they not "educationally appropriate"? Does that mean the past and current Wedgeworth students are not educated appropriately? I do understand that the Calif Dept of Education approved a K-8 school housing 1000 pupils (not 1200) back in 1963; but that was more than 50 years ago! It approved it but did not require it. Calif Dept of Education also approved Glenelder and La Subida schools, but HLPUSD even closed them, didn't it? The DEIR does not explain why Wedgeworth needs to expand from K-5 toK-8, that is, why this expansion should be an objective. Why is the objective not keeping the school at K-5 or even shrinking it to K-3, say for example? Correct me if I am wrong, student enrolment in HLPUSD was down by 8% in the past 2 or 3 years, and HLPUSD forecast that the enrolment will keep decreasing, but on the other hand, HLPUSD forecast that Wedgeworth enrolment would go up, therefore justifying the replacement and expansion of Wedgeworth. I have not seen any explanation from HLPUSD as to this seemingly strange thing. There

2. Response to Comments from the DEIR

has been no major residential development in the neighborhood; so where does the student increase come from? What makes mothers in this neighborhood more "reproductive" than others in the District? If HLPUSD does not know why, then this 1,200 forecast is unreliable. I simply don't see any support for the 1,200 number. Simply put, there is no "needs analysis" to support the 1,200 K-8 capacity. Why do we *need* a K-8 school for 1,200? Why should we achieve this objective? R16-6

Objective 3 is to demolish the existing campus. I don't see how this can become an objective, unless the existing facility poses safety threat to students and teachers. If that is the case, then the objective should be something like "provide a safe environment, in compliance with Building Code and Education Code." If you need to raze an old house in order to build a new one, the goal is to build a new house, not to demolish the old house. Demolish the existing campus, like demolishing the baseball fields, is a means to a goal (or goals), not a goal itself. And I think the existing campus is safe, isn't it? If it is not, then HLPUSD needs to show some evidence to prove it.

Objective 4 is to create (monetary?) value by seeking rezoning of the remaining property to R-3, which would provide a maximum of 160 dwelling units. Well, merely seeking rezoning does not create money. Only the actual sale of the land would make money. It makes little sense to me that simply filling an application to request rezoning would create value of some kind. Why R-3, not R-1, say? Would selling R-1 land more profitable than selling R-3 land? Would R-1 development be less environmentally impactful? And how much value (i.e. money) is HLPUSD talking about? Would HLPUSD incur any cost? How much is the possibility of successfully realizing this value? What is the risk? Is it possible that this objective – making money by selling the land – would not be achieved even if the proposed project is implemented, simply because the rezoning request is denied, for instance? If there are other factors involved, one cannot say a definite Yes to Achieving Objective 4 with respect to Proposed Project and Alternative 4 in DEIR Table 7-1.

It is worth mentioning that many have suggested, as an alternative to the proposed project, in the past that at least part of the Wedgeworth student population be moved to Bixby and Cedarland. This suggestion is not included as an alternative in DEIR Sec 7. Actually, HLPUSD addressed this in the FAQ on its web site https://www.hlpschools.org/wedgeworth-faq : R16-7

9. Why don't we move Wedgeworth students to Bixby and Cedarlane?
Every community has educational needs and Wedgeworth Elementary provides the needs for the Wedgeworth Community. Bixby and Cedarlane provide the instructional needs for the communities they serve. As noted in the response to question #7, neither of those schools have the existing capacity to accommodate the enrollment at Wedgeworth.

I find the answer unacceptable. When Glenelder and La Subida were closed, their students were transferred to other schools. Would HLPUSD then say that those other schools served only their own communities and therefore were not able to accommodate those dislocated students? For the sake of argument, if HLPUSD decides to close Wedgeworth for whatever reason, and its students need to move to some place else, would HLPUSD say "Every community has educational needs ... Bixby and Cedarlane provide the instructional needs [only] for the communities they serve"? That kind of argument only

shows that HLPUSD is not able to allocate existing resources flexibly and wisely. There is one HLPUSD district; there is not a Wedgeworth District, a Bixby District or a Cedarlane District. And the answer only says that neither Bixby nor Cedarlane has "existing capacity" to accommodate "the enrollment" at Wedgeworth. I don't know what precisely "existing capacity" means. Is it possible that there is available land but not enough classroom buildings? Then is it possible to build some buildings to accommodate the Wedgeworth students? Is the (individual or combined?) capacity not enough for the 600 current students at Wedgeworth or the forecast 1200? Can Bixby take in 300 and Cedarlane take in 300, for example? I surely think that this alternative should be included and discussed in DEIR. R16-7

Thank you.

Sincerely,

(Mr) Ming Lai

Attachments: 32 4"x6' photos (if HLPUSD make these photos public, please consider hiding the license plates)

2. Response to Comments from the DEIR

R16. Response to Comments from Ming Lai, dated January 17, 2020.

R16-1 The comment pertains to the existing and anticipated congestion at Pepper Brook Way and Wedgeworth Drive, which is an unsignalized intersection. The traffic impact analysis evaluated critical roadways that provide reginal mobility in the region and carry high traffic volumes. Due to their high traffic volumes, these types of roads are of primary concern from a roadway capacity standpoint. Local roads such as Wedgeworth Drive and Pepper Brook Way and other streets in the vicinity of the school are low-speed roads that do not carry large volumes of traffic and do not have capacity constraints. The proposed project would mainly cause a temporary traffic increase for two short periods (about 30 minutes before 8 am and between 1:45 pm and 2:15 pm) in the day for the school, and up to 160 units of residential units would generate about 74 AM peak and 89 PM peak hour trips. Therefore, these impacts would not be considered significant impacts to the environment.

It should also be noted that in January 2020, State courts stated that under Public Resources Code Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA. Therefore, impacts to traffic congestion measured in level of service is no longer a significant impact of the proposed project.

R16-2 Comments are noted. However, increase in traffic congestion in and of itself is not indicative of a safety impact. Rather, it is merely inconvenience. Although the proposed project will create additional delays at some of the intersections, as stated in above response R16-1, traffic congestion impacts are not a significant impact on the environment.

R16-3 The traffic count data collected on one day during a typical school day is representative of the existing condition, and evaluating AM and PM peak hours is consistent with the County of Los Angeles and the City of Industry traffic impact analysis methodology. As shown in RDEIR Table 5.8-4, *Trip Generation Rates*, and Table 5.8-6, *Phase 2 Project Trip Generation*, trips generated by the school would contribute more trips than the residential development in the AM and PM peak hours. Therefore, evaluating weekday trips with the proposed school in the RDEIR is appropriate, not weekend trips without the school trips.

R16-4 The intersection of Pepper Brook Way and Wedgeworth Drive is not the only way in and out of the project site for Azusa Avenue. It is speculative to assume that the parents as well as the residents in the new residential development would heavily use Pepper Brook Way at Wedgeworth intersection to result in significant traffic impact. There are other routes available in the area, and parents and residents could take these other routes to avoid traffic congestion in certain areas. Also, as stated in response to R16-1, impacts to traffic congestion measured in level of service is no longer a significant impact of the proposed project.

R16-5 As stated in the RDEIR, the County Mobility Element's goal is to maintain a minimum LOS D. However, it is not correct to state that therefore "it is a legal requirement that a local jurisdiction, presumably such as HLPUSD, needs to plan for a transportation network that meets the needs of all users, taking into consideration" the LOS D standard, among other things. HLPUSD only has jurisdiction over the school property. It does not have any authority over planning for a transportation network, including the intersection of Azusa Avenue and Pepper Brook Way. Therefore, although the RDEIR identified a mitigation measure that could reduce the impact to LOS D even with project implementation, this impact was found to be significant and unavoidable. The proposed project's consistency with other policies of the Hacienda Heights Community Plan is discussed in the Initial Study Section 3.11, Land Use and Planning, Table 4, included as Appendix A to the DEIR.

Moreover, pursuant to SB 743, impacts to traffic congestion measured in level of service are no longer a significant impact on the environment. Therefore, although the proposed project would not be consistent with the General Plan goals, it would not be considered a significant environmental impact. Furthermore, a project does not need to be consistent with every General Plan goal and policy.

R16-6 Pursuant to CEQA Guidelines Section 15124(b), a statement of objectives should include the underlying purpose of the project and may discuss the project benefits. The four objectives of the proposed project provide the District's underlying purpose for the proposed project, which is to replace the existing Wedgeworth Elementary School and build a new campus serving 1,200 K-8 students; avoid the need to move students off-site and minimize disruption; demolish the existing campus, which was meant to be a temporary facility; and allow residential development on the remaining property to create value. The DEIR does not need to elaborate or provide detailed support for these objectives.

An "educationally appropriate campus" generally refers to a facility that meets the current California Department of Education and Division of State Architect codes and other programming needs of the students. The Board of Education has the responsibility and authority to establish the project's objectives. Under the Board of Education's direction, objectives for the proposed project have been established. The project objectives to demolish the existing campus and to create value through rezoning are statements that provide the underlying purpose of the proposed project, and therefore are adequate pursuant to CEQA Guidelines.

R16-7 RDEIR Section 7.1.1, Purpose and Scope, lists the purpose and scope of the alternative analysis. Moving students to Bixby ES and Cedarlane Academy does not meet the criteria for further discussion under the alternative analysis. Therefore, no further discussion in the RDEIR is necessary. However, the comments will be forwarded to the Board of Education for consideration prior to making a decision on the proposed project.

2. Response to Comments from the DEIR

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LETTER R17 – Ming Lai (2 pages)

R17

17102 Ridge Park Dr
Hacienda Heights CA 91745-3848
January 20, 2020

Hacienda La Puente Unified School District
Mark Hansberger, Director, Facilities Projects
15959 E Gale Ave
City of Industry CA 91716-0002

Dear Mr Hansberger:

This letter is to make a comment, in addition to those in my January 17 letter, on the Wedgeworth K-8 School and Residential Development Project proposed by the Hacienda La Puente Unified School District (HLPUSD) in response to the draft environment impact report (DEIR), dated December 2019, as published on HLPUSD's web site.

The Initial Study, dated July 2019, appended as Appendix A to the DEIR, states that "The future development of 10 acres as 160 units would require a zone change and discretionary approvals from the County." (page A-46) DEIR also indicates that HLPUSD plans to seek a zoning change from R5 to R3 for the 10-acre land. Obviously Phase 2 of the project, i.e., the residential development part, is contingent on the approval by the County of L A of the rezoning request. A letter dated August 26, 2019 from the County Department of Regional Planning, in response to the Notice of Preparation of the DEIR, is included in Appendix A to the Initial Study. The letter brought up "a number of comments and concerns," one of which is related to Land Use and Planning: R17-1

> The Hacienda Heights Community Plan, adopted in May, 2011, designated this property [i.e., the 10 acres] as H5 (Residential 5) land use category, which would permit a maximum range of up to 5 dwelling units per acre. Currently, the maximum permitted density would be 50 residential units. The project proposes "up to 160 dwelling units", which is significantly higher than what was planned for on this property. The property also has a R-A (Residential-Agriculture) zoning designation which would further require a minimum of 5,000 sq ft of area for each residential unit.

The DEIR does not include any discussion as to the assessment of the likelihood of changing the zoning designation made as recent as 2011, how long it would take to get the rezoning approved, and any contingency or fallback plan or change of the proposed project in the case that the zoning change is not approved.

On the other hand, the proposed project calls for the displacement of the Highlander baseball fields, which is identified in DEIR Sec 6.1 as a "significant unavoidable adverse impact" on recreation. R17-2

According to DEIR, Phase 1 (Wedgeworth School replacement and expansion) of the proposed project precedes Phase 2 (residential development). The baseball fields are to be demolished in Phase 1. What if the fields are torn down and then the rezoning request is rejected by the County? That would be a lose-lose situation. I suggest that HLPUSD, in the interest of the community, hold the demolition of the baseball fields, assumed that it certifies the DEIR and goes ahead with the project, until it gets the

2. Response to Comments from the DEIR

rezoning request approved. After all, Wedgeworth has been using temporary portables for five decades, it can wait a little bit longer. If the rezoning request is not approved, then HLPUSD can probably change the building plan of the new campus so that both the new school and the baseball fields can co-exist. R17-2

Thank you.

Sincerely,

Ming Lai

(Mr) Ming Lai

R17. Response to Comments from Ming Lai, dated January 20, 2020.

R17-1 The Initial Study (Appendix A to the DEIR) indicates that the project site is designated H5 Residential 5 (0 to 5 dwelling units per acre) by the General Plan and zoned R-1 (Residential Agriculture), consistent with the comments from the County Land Use and Planning. The Initial Study provides consistency analysis for the proposed project, which would increase the density to 9 to 18 units per acre. An assessment of the likelihood of changing the zoning designation made in 2011, or how long it would take to get the rezoning approved, and any contingency or fallback plan are not part of the physical environmental impacts of the proposed project that need to be addressed in the DEIR. There is no actual development plan for Phase 2 of the proposed project, and the processing time for the residential development is unknown at this time. The DEIR assumed project buildout year of 2026 for planning purposes. The DEIR is adequate, and no further response is necessary.

R17-2 The baseball field within the Phase 1 boundaries would be demolished first. The rezoning application to the County would be submitted with Phase 2 development when there is an actual residential development plan. This would require additional discretionary action from the County of Los Angeles. Your comment will be forwarded to the Board of Education before they consider whether to approve the proposed project.

2. Response to Comments from the DEIR

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LETTER R18 – Anita Lee (1 page)

R18

-----Original Message-----
From: Anita Lee [redacted]
Sent: Friday, January 17, 2020 8:42 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Wedgeworth project

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R18-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R18-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R18-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,

Anita Lee

Sent from my iPhone
Hotelbeds strictly respects, enforces and monitors the confidentiality of information it receives from, and shares to, its different stakeholders. The content of this email is regarded as confidential and intended only for the recipient specified in the message. If you are not the intended recipient, any disclosure, copying and distribution of the message, or any part thereof, is prohibited and may be unlawful. In this case please reply with the subject "wrong delivery" and delete the message.

2. Response to Comments from the DEIR

R18. Response to Comments from Anita Lee, dated January 17, 2020.

R18-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R18-2 The comment is related to the financial support to be provided by the Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and it does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R18-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R19 – Joann Li (1 page)

R19

-----Original Message-----
From: Joann [redacted]
Sent: Friday, January 17, 2020 10:56 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Cc: Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: From Wedgeworth ES parent

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R19-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R19-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R19-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,

Joann Li

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2. Response to Comments from the DEIR

R19. Response to Comments from Joann Li, dated January 17, 2020.

R19-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R19-2 The comment is related to the financial support to be provided by Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and it does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R19-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R20 – Mandy Li (1 page)

R20

-----Original Message-----
From: Mandy Li [redacted]
Sent: Monday, January 20, 2020 6:29 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Wedgeworth Elementary School Project

Dear Mr. Hansburger, Board Members and Superintendent,

As Wedgeworth Elementary School parents and Hacienda Heights residents, we would encourage all of you to continue to support Wedgeworth K8 school project. R20-1

To begin, we would like to acknowledge one of the concerns expressed by the community regarding increase in traffic flow during the project development. As we agree that it way be the case, we also understand this will be temporary.

Upon the completion of the the school, the traffic situation will be quite the contrary. The plan includes ample staff parking space, and a much needed student dropoff and pickup zone.

We, therefore, consider that the overall traffic impact is minimal, and it should not be an obstacle in the completion of the Wedgeworth K8 project.

Second, it is important to make a clear distinction between recreational activities offered by non-profit organizations in the community and political activities. R20-2

Supervisor Janice Hahn and the LA County 4th District office offered a generous financial support in the amount of $1.5 million to the Hacienda Heights Little League for rebuilding the fields. The amount is deemed insufficient by the League's representatives.

The $1.5 million grant is actually community tax money, and we want to make sure our tax dollars are used to fund positive impact in the community whether it is for educational or recreational purposes.

The board of education of HLPUSD should therefore seek to correct this situation. Otherwise, Hacienda Heights residents will not welcome a sport organization heavily involved in political activities. This will cause unfair treatment and division within the community.

Once again, we thank you very much for your continuous support. We are looking forward to the completion of the Wedgeworth K8 school.

Regards,

Mandy Li
Parent of Wedgeworth Elementary

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2. Response to Comments from the DEIR

R20. Response to Comments from Mandy Li, dated January 20, 2020.

R20-1 The comment indicates that the overall traffic impact would be minimal and should not be an obstacle to the proposed project. The comment is acknowledged, and no response is necessary.

R20-2 The comment pertains to the financial support offered by Supervisor Janice Hahn and the LA County 4th District Office. The comment expresses an opinion and is not specific to the content of the DEIR. The comment is noted and will be provided to the Board of Education for consideration.

LETTER R21 – Gabriela Navar (1 page)

R21

January 21, 2020

Hacienda La Puente Unified School District
Mark Hansberger, Director, Facilities Projects
15959 East Gale Avenue
City of Industry, California 91716-0002

Re: The Wedgeworth K-8 School and Residential Development Project Draft Environmental Impact Report

Dear Mr. Hansberger,

As a resident that lives across the street from the Wedgeworth project I have major concerns in regards to the short term and long-term environmental impacts of this project. The Draft EIR states 2 significant impacts in regards to recreation and traffic but there are other impacts that need to be further accessed with more details.

First, the health impact of building a school withing 1000 feet of a major freeway. This school is planned to be built to meet the minimum 500 feet criteria away from the 60 freeway but air quality studies have shown and recommended a buffer of 1,000 feet from major roadways. The County of Los Angeles Public Health Department stated in March of 2019 "New schools, housing or other sensitive land uses built between 500 and 1500 feet of a freeway should adhere to current best-practice mitigation measures to reduce exposure to air pollution which may include: the use of regularly maintained air filtration to enhance heating, ventilation and air conditioning (HVAC) systems, and the orientation of site buildings and placement of outdoor facilities designed for moderate to vigorous physical activity as far from the emission source as possible". R21-1

Second, the issue that was brought up by Caltrans in regards to run off should also be further look into. The community has concerns in regards to the Los Angeles County not allowing this new development to connect to the existing stormwater drainage system. Having to create an underground stormwater retention system that would infiltrate the ground is a major concern for the residents. Another concern related to this matter is the polluted runoff and the increase amount of surface runoff in a manner which would result in flooding on- or offsite. R21-2

Third, details in regards to traffic need to be further accessed and reviewed. Per the documentation provided. Traffic counts were made in May of 2019. More streets need to be assessed for longer periods of time. The Los Angeles County and the City of Industry also needs to provide comments in regards to remedies they can provide in regards to State Route 39 since it was confirmed by Caltrans that the section of SR-39 that will be impacted by this project is not part of their jurisdiction. R21-3

Lastly, more attention and details need to be provided in regards to the future of Hacienda Heights Little League in the area. Loss of the 40-year-old sports complex is not acceptable. In November of 1977 the Hacienda La Puente Unified School District Education Board instructed the HLPUSD administration to develop a plan in which 3 factors would be considered, those factors being educational program needs, desirable dimensions for development and adequate space for Little League. A plan was developed where all those factors were taken into account and on January 24, 1978 the Board unanimously approved construction of baseball diamonds. The Wedgeworth land shall be used for those 3 factors. Eliminating Little League from the land was not part of the original agreement. Demolish infrastructure and incurring that cost is a waste. R21-4

Thank you for the opportunity to comment in regards to this project.

Gabriela Navar

2. Response to Comments from the DEIR

R21. Response to Comments from Gabriela Navar, dated January 21, 2020.

R21-1 The comment is concerned about the health impact of proposed school within 500 feet of the SR-60 freeway. The District is aware of the potential health impacts of air pollution from development near freeways and high-volume roadways, and recommendations from various agencies to locate sensitive receptors such as schools, playgrounds, residences, recreational facilities, at least 500 feet from freeways. Therefore, the District conducted a health risk assessment (HRA) to evaluate potential health risk associated with siting a school at approximately 350 feet from the SR-60 freeway, included as Appendix D to the DEIR. According to the HRA, the South Coast Air Quality Management District and the Office of Environmental Health Hazard Assessment established a maximum incremental cancer risk of 10 in a million (1x10-5) as a threshold. Therefore, provided that the exposure rate is less than 10 in a million, the risk is considered acceptable, and impacts would not be significant or require mitigation. As demonstrated in the HRA, the health risk associated with the proposed project was calculated at 2.4 per million for students and 1.5 per million for adult school staff. Even these estimates are conservative estimates because the modeling assumed that maximum exposed receptors (both students and staff) stood outside at the subject site for eight hours per weekday (8:00 am to 4:00 pm, Monday to Friday), 180 days per year for 9 years (kindergarten to 8th grade students) or 250 days per year for 25 years (staff). In reality, students and staff are exposed to outdoor pollutant concentration levels only during breaks, lunch, and PE class and are exposed to reduced indoor pollutant concentrations for the remaining school hours. Note that the minimum distance provided by the County Public Health Department and the California Air Resources Board are recommendations based on studies showing high air pollution concentrations near freeways. However, site-specific evaluation was conducted for the proposed school, and based on substantial evidence, the DEIR determined that the proposed project would not expose the school population to actual or potential hazardous emissions related to the freeway or other stationary and mobile sources.

R21-2 The on-site soils are fine-grained (silty clays) and have low percolation rates for infiltration systems. The stormwater detention system to be constructed underneath the soccer field would be designed so that the rate at which the collected water seeps into the soil would not adversely impact the stability of the soil. The system is sized to handle a 50-year design storm, as required by the County. Although minor settlement (less than 0.5 inch) may occur over time in the alluvial soils directly below the stormwater retention system as a result of stormwater infiltration and percolation, the use of permeable gravel materials for subgrade support and geosynthetic filter fabrics and geotextile in the design of the stormwater retention system would mitigate potential ground settlement to less than significant levels and improve soil stability.

R21-3 No evidence was provided to support the assertion that more streets need to be assessed for longer periods of time. The traffic analysis was prepared in accordance with the County of Los Angeles and City of Industry methodology for a traffic impact analysis

and is adequate. No comments were received from the City of Industry, and the traffic study was updated to incorporate comments from the County of Los Angeles Department of Transportation. The updated traffic study is included as Appendix F to the RDIER. The conclusion of the traffic study did not change per the comments.

Caltrans did not comment on impacts to Azusa Avenue (State Route 39). Caltrans, in its letter dated January 3, 2020 (Agency Letter A2), commented that Caltrans does not expect project approval to result in a direct adverse and significant impact to the existing state transportation facilities.

R21-4 Environmental impacts from displacement of the baseball fields have been addressed in the RDEIR Section 5.7, *Recreation*, and impacts were determined to be less than significant with incorporation of mitigation to provide four replacement fields at two District-owned sites. The RDEIR reviewed physical environmental impact of displacing four ballfields at the project site and development of four replacement fields at Kwis ES and Cedarlane Academy, and impacts were found to be less than significant. The RDEIR Chapter 7 added New Expanded K-8 School and Four Baseball Fields Retention (Including One Shared Field) that considered retaining all four baseball fields. This alternative would require sharing of one large baseball field with the school during school operating hours to meet the needs of the K-8 school students. The terms of the original agreement and the cost of demolishing and developing baseball fields are not under the purview of the CEQA analysis. Comments will be forwarded to the Board of Education before they consider whether to approve the proposed project.

2. Response to Comments from the DEIR

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LETTER R22 – Adriana Quinones (1 page)

R22

January 21, 2020

Mr Hansberger,

this letter is to advise you that are community is in total opposition to bringing 600 additional vehicles to our community on Wedgeworth avenue R22-1

It will bring negative impact to our community because it will increase
- Noise
- traffic
- Pollution
-

Since my printer broke, I will follow up with a detailed e mail to you and copy the board.

Thank you,

Adriana Quinones
Hacienda Heights resident
626 494 0319
Sgest3@Me.com

2. Response to Comments from the DEIR

R22. Response to Comments from Adriana Quinones, dated January 21, 2020.

R22-1 The comment provides an opinion without any substantial evidence to support the claim or specific comments on the DEIR. Environmental impacts from noise, traffic, and pollution were addressed in the EIR, and no further response is necessary. Comments will be forwarded to the Board of Education before they consider whether to approve the proposed project.

LETTER R23 – Christine Salazar (2 pages)

R23

From: Christine Salazar [redacted]
Sent: Tuesday, January 21, 2020 4:39 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Wedgeworth School Project <wspquestions@hlpusd.k12.ca.us>
Subject: Wedgeworth School Project Comment Letter

PLEASE CONFIRM UPON RECEIPT

To whom it may concern:

My name is Christine Salazar and I am a resident of Hacienda Heights, a parent of the HLPUSD (one goes to PS at Bixby and the other at Wedgeworth) and a product of the very school district I have my kids in.

While the EIR is very detailed, I believe it lacks additional studies to confirm what we all fear - that the Future Wedgeworth Project is going to be detrimental to the community it currently sits on. R23-1

I urge local agencies to continue to administer traffic studies that range at least a 2-mile radius of the proposed new school. Wedgeworth Dr currently has 3 schools (2 elementary and 1 highschool) and then a little further down, we have Cederlane. The general public has been vocal about horrible traffic that currently exists in the area, but what needs to be taken into account is the doubling of enrollment that this school is to have (the majority if not all 600 students are to be from outside of the school district). Not to mention, the increase traffic from a potential 160 residential units in such a small space. A school district CANNOT go ahead with a plan that will further endanger the community and the students that go to this school. Traffic is bad enough, and unless the district plans on having patrol officers in the area, I foresee many collisions. R23-2

I also urge the agencies to do additional soil samples. 10 feet is not enough, especially after the area has been generally untouched for 40 years. You need to take samples as low as 30 feet. Based on recent accounts from past founders and their families (the very families that BUILT the Highlander Fields) there is a concern about not only the soil but about the drainage - in particular the sewage system. If the district is going ahead with the residential units, they MUST also test on the land that will be going to building such residential units. What they will find is surprising. I urge you to drill and actually have an extensive test on both lands that will be for the new school AND the 'future' residential units. R23-3

Another great concern is the pollution that both projects will create on the community - both to the students and the residents (and that includes Highlander) I do not see any protection barriers for the kids that play baseball during the fall and spring season. Steps must be taken to R23-4

2. Response to Comments from the DEIR

make sure our kids are taken care of so there will not be any lasting health effects.

And last and certainly not least, the destruction of the Highlander Baseball fields, that have existed in the community for 40 years. Hacienda Heights Little League services 500+ kids from the area and at present time, Highlander is the only space that is big enough and safe enough to accommodate the large numbers and traffic/parking. The district MUST find an option or reconfigure the plans where both can continue to coexist. Sharing the land is the best option because it will not be detrimental to the area and will save the district $10+million by not having to relocate and reconstruct the necessary fields at another location. R23-5

While a new school would be beneficial, the cons MUST be addressed in order for the community to be part of the solutions.

I thank you for your time.

Christine Salazar
HH Resident

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R23. Response to Comments from Christine Salazar, dated January 21, 2020.

R23-1 The comment asserts that additional studies are needed to confirm that the proposed project is going to be detrimental to the community. However, no substantial evidence has been provided to support the assertion. The DEIR and the RDEIR substantiated that the proposed project would result in potentially significant and unavoidable impacts related to transportation (LOS and VMT), and all other impacts would be less than significant with and without mitigation. Additional studies are not necessary to confirm or evaluate impacts related to the proposed project. No further response is necessary.

R23-2 The Traffic Study (Appendix F to the RDEIR) covers the area that contains four schools as mentioned by the comment—Wedgeworth Elementary School, Bixby Elementary School, Glen A. Wilson High School, and Cedarlane Middle School. It is incorrect to state that the majority, if not all 600 students to be added by the proposed project are to be from outside of the District boundary. Approximately 16 percent (92 students) of the existing Wedgeworth ES students are from outside of District boundaries, and approximately 16 percent of the proposed K-8 school students could come from outside the District boundaries. The Traffic Study also accounted for traffic from the up to 160 units. Traffic impacts have been evaluated, and one intersection (#13 Azusa Avenue and Pepper Brook Way) was found to have a significant impact exceeding the significance threshold of level of service (LOS) D. Although a mitigation measure has been identified, because the District has no jurisdiction authority over implementation, this impact was determined to be significant and unavoidable. Collisions and the number of accidents are not necessarily increased by traffic congestion. Although collisions may be expected to increase due to increased number of cars on the road, they may also decrease due to a reduction in speed. The relationship between traffic congestion and occurrence of traffic collision and accidents are not clearly defined.

It should be noted that pursuant to Senate Bill 743 and Public Resources Code Section 21099 and CEQA Guidelines Section 15064.3(a), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. Therefore, traffic congestion impacts to area roadways due to the proposed project is no longer considered a significant impact to the environment under CEQA. However, in order to fully disclose traffic impact of the project, the District found the LOS impact significant and unavoidable.

The proposed project would provide approximately 400 feet of on-site student loading area, and separate busing area and staff parking from the student loading area, thereby improving queuing conditions. Additionally, there are already crossing guards and school monitors that assist students to get in and out of cars in the student drop-off/pick-up area. These school monitors and crossing guards will continue to assist with the school

traffic during drop-off/pick-up hours, and having patrol officers in the area is not necessary. Thus, the project would not cause a significant safety impact.

R23-3 The comment asserts that additional soil samples from at least 30 feet should be taken because 10 feet is not enough. As stated in the Geotechnical Investigation (Appendix F to the DEIR), 19 exploratory borings were drilled at depths ranging from 6.5 feet to 51.5 feet below the existing ground surface. Each boring was visually logged by a geotechnical engineer and sampled at regular intervals and at changes in subsurface soils. A percolation test was performed at the east side of the project site in the baseball field to the depth of 10 to 20 feet below ground level (shown as PT-5 in Appendix F to the DEIR, Geotechnical Investigation, Figure "Site Plan and Approximate Location of Borings"). Based on the soils report's percolation tests, the existing soil 13 to 21 feet below grade has acceptable infiltration rates that meet LA County minimum requirements. Just because the area has not been generally touched for 40 years is not enough reason to perform testing beyond what is necessary. The comment did not substantiate why the soil sample needs to be taken at 30 feet. No additional sampling is necessary.

The comment asserts that there is a concern about drainage, and in particular the sewage system. Stormwater drainage and sewage are two different systems. The comment does not specify an environmental concern or adequacy of the DEIR. The DEIR evaluated the utilities and service systems for the proposed project, which include the drainage and sewer systems, and determined that impacts would be less than significant provided that the proposed project complies with the existing regulatory requirements. Adequate drainage and sewer systems are required per the Count of Los Angeles standards prior to any construction for both Phase 1 and Phase 2 development. Site-specific information on drainage and sewer systems will be required as part of the residential development application at the time of development proposal.

R23-4 Children will not be present on the baseball fields, and the fields would be closed prior to start of the Phase 1 construction. No construction barrier specific to the baseball fields is necessary.

R23-5 Comments regarding the baseball field displacement do not address physical environmental impacts or adequacy of the DEIR. Comments are noted and will be forwarded to the Board of Education for review and consideration.

LETTER R24 – Ben Wong (1 page)

R24

From: Wong, Ben K <[redacted]
Sent: Friday, January 17, 2020 8:44 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>
Subject: Wedgeworth Project

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R24-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R24-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R24-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely.,

Ben Wong

2. Response to Comments from the DEIR

R24. Response to Comments from Ben Wong, dated January 17, 2020.

R24-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R24-2 The comment is related to the financial support to be provided by Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and it does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R24-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R25 – Hazel and Carlo Yu (1 page)

R25

From: Hazel Ng [redacted]
Sent: Tuesday, January 21, 2020 4:52 PM
To: Annie N. Bui <anniebui@hlpusd.k12.ca.us>; Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; mgmedrano88@gmail.com; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>
Subject: WW K-8 comment

Dear Mr. Hansberger, Interim Superintendent, and Respected Board Members,

Our family, including the grand parents and my two children support the building of wedgeworth K8 school for this coming year.

Schools around us including Walnut school district is actively promoting their schools and DI program to all the parents in other districts including us , of course.
Building a new WW school will be able to help retain and attract students for our district. Parents want the best for their children. R25-1

As residents and parents of Wedgeworth elementary, we sincerely hope you will continue supporting the K-8 school project. We understand while there may be some inconvenience, such as pick-up/drop-off traffic congestion, during construction, we believe the inconvenience will only be temporary. Once the school is built, there will be ample parking spaces, which will, in the long run, reduce the current congestion by rerouting the traffic into the drop off loop, which will feature a pick-up loop as well. These parking spaces can also will also benefit the community's need for additional parking when necessary. R25-2

In addition to traffic issues, we appreciate the $1.5 million provided by supervisor Janice Hahn to Hacienda Heights Little League to help alleviate concerns they raised pursuant to the project. Her gesture was very generous. While we acknowledge that the Little League had no formal entitlement to the area they were using, we are hopeful that this gesture will resolve any opposition they may have previously voiced. R25-3

Finally, we would to note that while our children may not necessarily receive the immediate benefits of a school that is will be years from completion, we, as a community have been looking forward to rebuilding the Wedgeworth campus for over 50 years collectively, and are happy to contribute our efforts for the benefit of the kids who will enjoy the fruits of our efforts. We look forward to bringing this project to fruition and appreciate your continued support and approval. R25-4

Sincerely,
Hazel & Carlo Yu

2. Response to Comments from the DEIR

R25. Response to Comments from Hazel and Carlo Yu, dated January 21, 2020.

R25-1 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R25-2 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R25-3 The comment is related to the financial support to be provided by Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and it does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R25-4 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R26 – Jessie Yu (1 page)

R26

From: Baba Mama [redacted]
Sent: Saturday, January 18, 2020 2:06 PM
To: Joseph K. Chang <jkchang@hlpusd.k12.ca.us>; Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Annie N. Bui <anniebui@hlpusd.k12.ca.us>; Anthony Duarte <gaduarte@hlpusd.k12.ca.us>; Gino Kwok <gkwok@hlpusd.k12.ca.us>; Jeffrey DeLaTorre <jdelatorre@hlpusd.k12.ca.us>; mgmedrano88@gmail.com
Subject: appreciate all your supports in helping rebuild a K8 school for Wedgeworth

Dear Mr. Hansberger, interim superintendent, and respected board members,

As residents and parents of the school, we sincerely hope you to continue supporting Wedgeworth K8 school project. We understand there may be traffic congestion problems during the construction time, and it may cause some extra traffic flow during drop off and pick up time, but we believe these problems can be temporary. Once the school is built with ample parking spaces, it could reduce the traffic jam by rerouting the traffic into its drop off loop, same solution with pick up process. These parking spaces can also be opened to public when needed. We believe traffic issues can be solve by multiple solutions. R26-1

In addition to traffic issues, we fully acknowledge and appreciate the 1.5 million provided by our supervisor Janice Hahn to the Little League to help them rebuild is very generous. We also want to remind everyone that Little league is not entitled to anything, and this is also our tax money. We were hoping them to at least show some appreciation in the public announcements. R26-2

Finally, we would like to remind all the board members, superintendent, and Mr. Hansberger, parents like us, the residents of the Hacienda Heights, have been looking forward to the rebuilt of the school for a very long time, 50 years long wait. Many of us might be leaving due to graduation from 5th grade, just like parents before us, but we have no regret of being part of these process and to witness this great plan come to reality, and this needs your full support and approval. R26-3

We sincerely appreciate all your supports in helping rebuild a K8 school for Wedgeworth, its students, many future students and the community.

Sincerely,

Jessie Yu

2. Response to Comments from the DEIR

R26. Response to Comments from Jessie Yu, dated January 18, 2020.

R26-1 Comments indicate that the additional traffic and parking impact would be temporary and can be solved by multiple solutions. No specific comments to the DEIR were provided, and no response is necessary.

R26-2 The comment is related to the financial support to be provided by Supervisor Janice Hahn and the Los Angeles County 4th District office for the replacement baseball fields, and it does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

R26-3 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER R27 – Sue Kovall (4 pages)

R27

From: Sue Kovall [redacted]
Sent: Tuesday, January 21, 2020 12:46 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Response to DEir. Please respond that this is received

Mr. Hansberger .

This letter os om response to the Draft Environmental Impact Report for the Wedgeworth school Project. To start, This project includes a developer being allowed to build 160. Units. This should absolutely not be included except that maybe an outside interested party is requesting its inclusion.
It should not be a part of the DEIR. It does not coincide with the community plan R27-1

Again a question arises as to why K_*? There has been a long standing policy to keep these ages separated R27-2

2. Response to Comments from the DEIR

for many reason I will not go into here. Being able to drop your children in one place for school is no reason to change this. A junior high by itself brings many growth experiences. R27-2 Cont'd

There would. Be great impact on noise, population and traffic. Environmental factors potentially affected Would include aesthetics, land use, population and public services. The planned townhomes do not coincide with the community plan and hthey are not compatible with the qadjacent homes. The condos on the other side of the school property have not homes next to them. R27-3

THe DEIR does not look into a full picture of alternatives. I points out having no new school, Little League remains and no land is sold fo housing development Then it directly jumps into a new k-5 school and Little League is still destroyed. You FAILED TO MENTION THE ALTERNATIVE WHERE A K-5 SCHOOL IS BUILT, THE LITTLE LEALGUE REMAINS AND NO LAND IS SOLD. BUT THE CURRENT SCHOOL LAND BE USED FOR THE RECREATIONAL AREAS FOR THE K AND 1-5. R27-4

The recreational effects of losing the LL fiends is a great on to the community and very costly. You say this loss is unavoidable and insignificant.. IT IS Not. The alternatives offered to the LL fail greatly. R27-5

Leaving the LL fields would allow a needed distance of the school yards from the freeway given the "unhealthy traffic emissions of a freeway. R27-6

As stated by the LA County Health Depart., this project "is in a high Pollution burdened area (88%) according to Cal Enviro screens 3.0 and development of a sensitive land use in this area contributes to cumulative exposure and localized health impacts"
They requested the consideration of emissions from vehicles idling, to evaluate potential impacts- ultra fine particles are a constituent of vehicle exhaust that can travel to lungs and into the bloodstream." This is fact even though it is not regulated- It m must be a large consideration.
The LA County Health Department also requests the EIR include impacts associated with fugitive dust emissions and include a discussion on Valley Fever for dust emissions R27-7

So many things should be considered which you failed to address. R27-8
LA County Public works Depart. Dsaid "existing hazardous waste management infrastructure in LA county is inadequate to handle the hazardous waste currently being generated and household hazardous waste…could adversely impact existing infrastructure. You did not address this in the EIR. Then La Count Depart. Of Regional Planning suggests providing land Use density standards-indicating that the proposal fo ouup to 160 units would be significantly higher than the currently permitted density of 50 units. R27-9

I would like to know the results of th Mission Indians consult re tribal cultural. Resources and their interests. R27-10

The DEIR dos not adequately describe the environmental impact of this project. R27-11

The proposed land use changes are not compatible with the character of the e existing area.

THE IDENTIFUED GOALS, POLICIES OR MITIGATION MEASURES SHOULD NOT BE ADOPTED BUT MODIFIED. R27-12
THERE ARE OTHE MITIGATION MEASURS THAT SHOULD BE APPLIED TO THE PROJECT.
THER ARE ALTERNATIVES TO THE PROOJECT THAT WAOULD SUBSTANTIALY LESSEN ANY OF THE SIGNIFICENT IMPACTS OF THE PROPOSED PROJUCT AND ACHIEVE MOST OF THE BASIC PROJECT OBJECTIVES.

The intent of the DEIR is to provide sufficient information to allow the HLPUSD to make an informed decision. R27-13

IT FAILS TO DO SO - IT IS NEGLIGENT IN STUDIES, DOING ONLY THE MINIMUM REQUIREMENT, IT IS MOSLEADING AS WELL

THE BOARD NEEDS TO REJECT THE EIR DUE TO NEGLIGENCE.

R27-13 Cont'd

The post of Traffic has not been adequately addressed
Wedgeworth Dr between Eagle Park and Ridge Park was not monitored
This is precisely where this project is planned. The intersections of Eagle Par/Wedgeworth, Orchard Hill/ Wedgewroorth, Manor. Gate/ Wedgeworth , Park Lawn/ Pepperbrook, Orchard Hill/Pepperbrook. Now these were neglected, however what is of utmost importance is that the entire Transportation report is base on information gotten during the summer months when school was NOT IN SEESION. How inadequate is that?

R27-14

The interpretation fo information in the EIR is also something to be questioned. With those transportation studies, one of the mitigations is to change the 2 lanes at PepperBrook/ Azusa going East. One lane is already a Left turn lane The proposal is to make the right lane a Left/straight/ and Right turn. HOW CRAZY IS THAT PROPOSAL? No one would ever get out of here to go straight or right while waiting for the others to turn Left. And the 2nd proposal to change the West bound Right turn to a no turn on red is also inappropriate sa as to deliver transport priority to those making a led=ft turn to go North on Azusa. Traffic would be backed up in every direction Also re traffic, the planned driveways at the school are set directly across from each of the 3 streets going into Wedgeworth Dr.. So the cars would have to cross WW to get in to drop off children.

R27-15

Noise/
Levels will be very high and they plan to work 7AM- 7PM 6 days a week????THis would have to be changed. NO on should be that exposed to noise and I did not see mention of how high the sound wall would be. It appears to. M e that The sound wall goes right down the middle of Kindergarten . Is more money needed then to re-do this new kindergarten area? I am fearful of the noise level.

R27-16

I live directly across the street from the planned project. The traffic is impacted here. No plan for emergency exit form this area. Already Emergency vehicles have to look for other ezxits once in this area.
To double the population would definitely increase the vehicle count. The EIR says students will be walking from the new housing units in 56 years. We cannot be building new homes for International students not students outside the HLPUSD.

R27-17

Aesthetically the project as planned now would block the beautiful view the at always Benn there of the MTS. And valley
I am also fearful of the fugitive dust and m y health as well as that of the students. My home, plants, bldg. structure will all be effected with the dirt and dust. We live in a drought area- trying to save water. Waterin 3x a day is wasteful and yet ineffective.

R27-18

This project Ould definitely "indue substantial unplanned population growth. If the HLPUSD Board actually reads this DEIR, I hope they will realize that the company hire is doin the minimal required and being negligent and irresponsible in their mitigations and studies

R27-19

The HLPUSD needs to provide a statement of overriding consideration at which time I hope they put this on hold to go back and take a look at the PR company and those dealing with DEIR

R27-20

2. Response to Comments from the DEIR

Thank you ,
Susan Kovall
1501 Lark Tree Way
HH

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R27. Response to Comments from Sue Kovall, dated January 21, 2020.

R27-1 The Draft EIR covers the project as defined by the District, which includes possible residential development on the remaining 10 acres. No developer or outside party has been involved in this project. Any future development would require further CEQA review and entitlement processing and approval with the County of Los Angeles.

R27-2 The comment is about the separation of elementary school students from middle school students and does not raise environmental issues. The commenter's opinion that a junior high by itself brings many growth experiences also does not raise environmental issues. No further response is necessary.

R27-3 Impacts on noise, population and traffic, aesthetics, land use, population, and public services all have been addressed in the DEIR. Future residential development on the remaining 10 acres would require further CEQA review and entitlement processing with the County of Los Angeles. Residential development would require a general plan amendment and zone change, at which time issues of the compatibility with the adjacent community would be further evaluated. However, compatibility is not an environmental impact under CEQA. There are apartment homes west of Eagle Park Road, and single-family homes border the project site to the east. Considering that the project area is a residential neighborhood, development of townhomes would not be inconsistent with surrounding residential uses. The Initial Study Table 4, Hacienda Heights Community Plan Consistency, included as Appendix A to the DEIR, provides consistency analysis with the Hacienda Heights Community Plan's policies. The project includes 160 dwelling units to consider as the worst case and most conservative approach for the EIR.

R27-4 The comment proposes an alternative to build a replacement K-5 school and retain four baseball fields. Impacts from this alternative would be similar to the Alternative 4, New Expanded K-8 School and Four Baseball Fields Retention (Including One Shared Field) alternative of the RDEIR, except that two of the classroom buildings could be one story instead of two stories. As with the conclusion for Alternative 4, this alternative would lessen environmental impacts in all areas evaluated in the EIR (air quality, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, recreation, transportation, tribal cultural resources, and utilities and service systems). This alternative would lessen the recreation impact, and no replacement fields construction would be necessary as mitigation. This alternative would also eliminate the significant transportation impact related to VMT for the residential portion of the proposed project, and eliminate significant LOS traffic impact compared to the proposed project. As stated by the commenter, this alternative is environmentally superior to the proposed project. However, as with other alternatives considered in the REIR, it would only partially meet the project objectives. Consideration of this new alternative would not require recirculation of the RDEIR as it would not result in a new significant impact. This alternative will be considered by the Board of Education.

2. Response to Comments from the DEIR

R27-5 The DEIR pertaining to recreation was recirculated to provide additional analysis, a new alternative, and incorporate mitigation. The RDEIR also included a new alternative to retain all four baseball fields. Recreation impacts would be less than significant after mitigation of providing four replacement ballfields on two sites.

R27-6 The baseball fields are closer to the freeway and used by Little League. It should be noted that the District conducted a health risk assessment (HRA) to evaluate potential health risk associated with siting a school at approximately 350 feet from the SR-60 freeway, included as Appendix D to the DEIR. According to the HRA, the South Coast Air Quality Management District and the Office of Environmental Health Hazard Assessment established a maximum incremental cancer risk of 10 in a million (1x10-5) as a threshold. Therefore, provided that the exposure rate is less than 10 in a million, the risk is considered acceptable, and impacts would not be significant or require mitigation. As demonstrated in the HRA, the health risk associated with the proposed project was calculated at 2.4 per million for students and 1.5 per million for adult school staff. Even these estimates are conservative because the modeling assumed that the maximum exposed receptor (both students and staff) stood outside at the subject site for eight hours per weekday (8:00 am to 4:00 pm, Monday to Friday), 180 days per year for 9 years (kindergarten to 8th grade students) or 250 days per year for 25 years (staff). In reality, students and staff are exposed to outdoor pollutant concentration levels only during breaks, lunch, and PE class, and are exposed to reduced indoor pollutant concentrations for the remaining school hours. Note that the minimum distance provided by the County Public Health Department and the California Air Resources Board are recommendations based on studies showing high air pollution concentrations near freeways. However, site-specific evaluation was conducted for the proposed school, and based on substantial evidence, the DEIR determined that the proposed project would not expose school population to actual or potential hazardous emissions related to the freeway or other stationary and mobile sources.

R27-7 The referenced comments are from the County Health Department's comments on the Notice of Preparation (NOP), prior to the preparation and circulation of the DEIR. The County Health Department's concerns were all addressed in Section 5.1, Air Quality, of the DEIR, and the County Health Department did not comment further on the DEIR.

R27-8 The referenced comments are from the County Public Works Department's comments on the NOP, prior to the preparation and circulation of the DEIR. The DEIR provided response to this comment by stating in Table 2-1 that the Phase 2 residential development would be required to comply with the requirements of County Public Works at the time of development and provide educational materials on the proper management and disposal of household hazardous waste as part of standard conditions of approval. The County Public Works Department did not comment further on this issue.

R27-9 The comment references the County Department of Regional Planning's comments on the NOP, not the DEIR. Approval of the residential portion of the proposed project does

not entitle the District to develop 160 residential units on the project site. It would allow the District to proceed with the sale of the surplus property to a developer for future development. This issue of incompatibility with the existing density allowance has been discussed in the Initial Study Section 3.11(b), Land Use and Planning, included as Appendix A to the DEIR. The Department of Regional Planning did not further comment on the DEIR.

R27-10 No correspondence was received from Native American tribes requesting consultation under AB 52. As a result, no consultation has occurred. No comment letters were received on the DEIR from Native American tribes.

R27-11 The comment states that the DEIR does not adequately describe the environmental impacts of the project and also asserts that the proposed land use changes are not compatible with the character of the existing area. However, it does not substantiate the claim of how the DEIR fails to describe the project or why it is not compatible.

R27-12 The comment states that the identified goals, policies, and mitigation measures should be modified. However, it does not specify how they should be modified or why. It also claims that there are alternatives to the project that would substantially lessen significant impacts and achieve most of the basic project objectives. However, the comment does not identify these alternatives. Response to Comment R27-4 provides response to the commenter's alternative suggestion of rebuilding the K-5 school and retaining all four baseball fields.

R27-13 As discussed previously in Responses R27-1 through R27-12, the DEIR and the RDEIR provide sufficient information for the District Board to make an informed decision. The DEIR goes into detail of the potential impacts and reviews alternatives and mitigation measures that would reduce environmental impacts. The comment fails to provide substantial evidence to support the claim.

R27-14 The comment states that the traffic impact has not been adequately addressed because Wedgeworth Drive between Eagle Park and Ridge Park was not monitored. Traffic conditions on Wedgeworth Drive are evaluated in the RDEIR Section 5.8.4, Impact 5.8.3. A site visit was conducted on February 13, 2020, between 1:30 and 2:30 pm during dismissal times, and traffic conditions at Orchard Hill Lane / Wedgeworth Drive, Park Lawn Road / Wedgeworth Drive, and Lark Tree Lane / Wedgeworth Drive were considered for queuing analysis. It was determined that because the internal driveway for the proposed project would allow an on-site queue of approximately 400 feet, or approximately 20 cars, the proposed project would not result in longer queues than the existing conditions.

R27-15 The comment questions the feasibility of Mitigation Measure TRAN-1 that requires restriping of the eastbound approach at Azusa Avenue and Pepper Brook Way and prohibiting right turns on red at the westbound approach. This intersection is a signalized

intersection, and the mitigation also required modifying the phasing for the eastbound and westbound approaches to split phase so that the conflicts are reduced.

Three project driveways on Wedgeworth Drive have been intentionally designed to be directly across the existing streets to reduce conflict. As shown in Figure 5.8-3, Site Access Recommendations, of the RDEIR, vehicles would need to enter from the eastern driveway and exit from the western driveway, and the center driveway will be closed during student drop-off and pick-up times. The cars would not be crossing Wedgeworth Drive at all three locations to drop off children.

R27-16 The County's noise standards prohibits construction noise between the hours of 7:00 pm and 7:00 am on weekdays or at any time on Sundays or holidays; therefore, construction noise is permitted and could occur outside of those hours. Mitigation Measure N-1 states that the temporary noise barrier shall be at least as high as the exhaust of equipment and break the line-of-sight between noise sources and sensitive receptors. Therefore, the actual height would be determined by the location and height of the exhaust of equipment. However, it is anticipated that approximately six feet or higher would be required to break the line-of-sight.

R27-17 There are multiple streets that provide access to the project site. Implementation of the proposed project would not result in inadequate emergency access to the area.

The DEIR does not say that students will be walking from the new housing units in 56 years. And the District is not building new homes for international students. The comments are not substantiated.

R27-18 The project site and its surrounding areas are urbanized, and there are no designated viewing points or viewsheds for a scenic vista. The project site is adjacent to SR-60, which is not designated a scenic highway, and no adverse effect on a scenic vista would occur. The only officially designated state scenic highway in Los Angeles County is SR-2, the Angeles Crest Highway and part of the Angeles Crest Scenic Byway, approximately nine miles north of the project site. The new development would not be visible from SR-2 considering distance, topography, and intervening development.

The District will follow all requirements of the South Coast Air Quality Management District and additional mitigation measures identified in the DEIR to ensure dust is controlled.

R27-19 The proposed 160 units of the residential portion of the project are anticipated to add approximately 464 persons to the area based on the average household size of 2.90 for unincorporated Los Angeles County. The County adopted its General Plan in 2014, anticipating an additional 16,734 people in the East San Gabriel Valley Planning Area between 2013 and 2035, from 239,218 persons to 255,952 persons. Of the projected increase of 16,734 persons in the San Gabriel Valley, 3,494 persons, or 20.9 percent, were

projected to be from the Hacienda Heights Community Plan Area. The General Plan also anticipated an increase of 6,272 housing units in the East San Gabriel Valley Planning Area, including 1,013 units in Hacienda Heights at buildout (post 2035).

The area surrounding the project site is already developed with residential uses served by existing infrastructure. The proposed increase of 464 residents would represent approximately 13.3 percent of the total General Plan buildout population increase in the Hacienda Heights Community Plan area, and 2.8 percent of the total increase in the East San Gabriel Planning Area. The proposed housing unit increase would represent approximately 2.6 percent of the total housing units projected in the East San Gabriel Planning Area and approximately 15.8 percent of the total units projected in Hacienda Heights. Although the proposed project would induce population growth in the project area directly, the growth was anticipated by the County and is consistent with the County's General Plan. Therefore, the proposed project would not induce substantial unplanned population growth in the area, and impacts would be less than significant.

R27-20 This statement is correct, the District is required to adopt a statement of overriding considerations if it finds that the project would create a significant and unavoidable impact.

2. Response to Comments from the DEIR

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3. Response to Comments from the Recirculated DEIR

Section 15088 of the CEQA Guidelines requires the Lead Agency (HLPUSD) to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the RDEIR and prepare written responses.

This section provides all written responses received on the RDEIR and the HLPUSD's responses to each comment.

Comment letters and specific comments are given letters and numbers for reference purposes. Where sections of the RDEIR are excerpted in this document, the sections are shown indented. Changes to the RDEIR text are shown in underlined text for additions and ~~strikeout~~ for deletions.

The following is a list of agencies and persons that submitted comments on the RDEIR during the public review period.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies & Organizations			
AA1	County of Los Angeles Department of Parks and Recreation	March 15, 2021	3-7
AA2	County of Los Angeles Fire Department	March 19, 2021	3-13
AA3	California Department of Transportation	April 5, 2021	3-17
Residents			
RR1	Edward Abbot	February 16, 2021	3-22
RR2	Etapkwan	March 15, 2021	3-24
RR3	Gabriela Navar	April 5, 2021	3-28
RR4	Haiyan Li	April 2, 2021	3-33
RR5	Helen Li	April 2, 2021	3-36
RR6	Highlander Baseball Complex Founders	April 2, 2021	3-39
RR7	Jack Hacienda	April 4, 2021	3-46
RR8	Jolene Blanco	April 5, 2021	3-57
RR9	Lupita Jimenez	April 5, 2021	3-60
RR10	Ming Lai	no date	3-67
RR11	Shelly Sun	April 3, 2021	3-70
RR12	Brian Voon	April 2, 2021	3-72
RR13	Connie Liu	April 3, 2021	3-74
RR14	Eve H	April 5, 2021	3-76
RR15	Grace Zhai	April 3, 2021	3-78
RR16	Hazel Ng	April 3, 2021.	3-80
RR17	Ian Suen	April 5, 2021	3-82

3. Response to Comments from the Recirculated DEIR

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
RR18	Jenny Liang	April 2, 2021	3-84
RR19	Jessie Yu	April 3, 2021	3-86
RR20	Joann Li	April 2, 2021	3-88
RR21	Jojo Chuk	April 2, 2021	3-90
RR22	Justin Mui	April 1, 2021	3-92
RR23	Lily Chan	April 2, 2021	3-94
RR24	Melody Hsieh	March 1, 2021	3-96
RR25	Ning Shu	April 2, 2021	3-98
RR26	Vivian Kuo	April 5, 2021	3-101
RR27	Vivian Wi	April 2, 2021	3-105
RR28	Yeekicho	April 5, 2021	3-108
RR29	Zona Don	April 5, 2021	3-110
RR30	Henry Roman	March 31, 2021	3-112

3.1 GOVERNMENT AGENCIES (RDEIR COMMENTS)

3. Response to Comments from the Recirculated DEIR

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LETTER AA1 – County of Los Angeles Department Parks and Recreation (2 pages)

AA1

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"
Norma E. García-González, Director Alina Bokde, Chief Deputy Director

March 15, 2021

Mr. Joel Duarte
Director of Purchasing and Warehouse
Hacienda La Puente Unified School District
15959 East Gale Avenue
City of Industry, CA 91716-0002

Dear Mr. Duarte:

NOTICE OF AVAILABILITY OF A RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR) FOR THE WEDGEWORTH SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT

Thank you for the opportunity to review the Recirculated Draft Environmental Impact Report (Draft EIR) for the Wedgeworth School and Residential Development Project (project). The Draft EIR has been reviewed for potential impacts on facilities operated and maintained by the Los Angeles County Department of Parks and Recreation. Please see our comments below: AA1-1

Page 5.7-4, Recreation, Impact 5.7-1

First paragraph, second to the last sentence:
It states "additional park facilities would be provided by the residential portion of the proposed project that would add value to the county recreation system without substantially impacting the existing recreation facilities." This statement is confusing and perhaps the word "no" is missing in front of "additional." According to the project description section, there are no parks or recreation facilities proposed for the residential portion of the project. AA1-2

Second paragraph, first sentence:
Please clarify whether the new K-8 school's recreational amenities, including two soccer fields and hardcourts, would be open and available to the public during non-school hours. AA1-3

Page 5.7-4, Recreation, Impact on Existing Recreation Facilities.

First paragraph, second sentence:
Please clarify whether parkland would be provided on-site as part of the residential portion of the project. AA1-4

Planning and Development Agency • 1000 S. Fremont Avenue, Unit #40, Alhambra, CA 91803 • (626) 588-5322

3. Response to Comments from the Recirculated DEIR

Mr. Joel Duarte
March 15, 2021
Page 2

Page 5.7-5, Recreation, Impact 5.7-2

First paragraph, sixth sentence:
This statement seems to suggest that the fees must be used to create new park facilities elsewhere. This is incorrect. The in-lieu fees can be used to improve existing parks in Park Planning Area 9 (Hacienda Heights) in which this project is located. AA1-5

First paragraph, eighth sentence:
Again, this statement mentions additional park facilities in the residential portion which are not included in the project description. AA1-6

Page 5.7-6, Recreation, Impact of New Recreation Facilities

First paragraph:
It is unclear whether on-site parkland or in-lieu fee payment would be provided. AA1-7

Second paragraph, second sentence:
This statement is incorrect. While development of the school is exempt from County requirements, the residential development portion of the project would have to comply with County codes, including Quimby requirements in Sections 21.24.340 and 21.28.140 in the Subdivision Code. AA1-8

Thank you for including this Department in the review of this document. Should you have any questions or require additional information, please feel free to contact Ms. Julie Yom of my staff at (626) 588-5311 or via email jyom@parks.lacounty.gov.

Sincerely,

Sean Woods,
Chief of Planning

SW:CL:JY:ev

c: Parks and Recreation (C. Lau, J. Yom)

AA1 Response to Comments from Sean Woods, Chief of Planning, County of Los Angeles Department of Parks and Recreation, dated March 15, 2021.

AA1-1 The commenter provides an introduction and no response is necessary.

AA1-2 The comment is noted. The text has been modified for clarification. This modification would not change the analysis or conclusion of the RDEIR.

Page 5.7-4, Section 5.7.4.1, Impact Analysis, Impact 5.7-1, 1st paragraph. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

Therefore, compliance with Los Angeles County Code Sections 21.24.340 and 21.28.140 ~~additional park facilities would be provided by~~ would ensure that the residential portion of the proposed project ~~that would~~ adds value to the county recreation system without substantially impacting the existing recreation facilities.

AA1-3 The comment asks if the new school's recreation amenities would be open and available to the public during non-school hours. The new K-8 school's recreation facilities will be available to the public per the Civic Center Act pursuant to the District policy.

AA1-4 The comment asks to clarify whether parkland would be provided on-site as part of the residential project. No development proposal or site design is available for the residential portion of the proposed project; therefore, it is unknown at this time if parkland would be provided. The residential development will require separate discretionary approval from the County, at which time the residential portion will be required to comply with the Los Angeles County Code Sections 21.24.340 and 21.28.140 and provide on-site parkland or pay in-lieu park fee.

AA1-5 Comment noted. The sentence has been modified for clarification. The modification would not change the conclusion of the analysis.

Page 5.7-4, Section 5.7.4.1, Impact Analysis, Impact 5.7-2, 1st paragraph. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

Pursuant to the Los Angeles County Code Sections 21.24.340 and 21.28.140, new recreational facilities may be provided on-site or elsewhere through the payment of in lieu fees, or the fees can be used to improve the existing parks in Park Planning 9 (Hacienda Heights).

AA1-6 The comment states that the below statement mentions additional park facilities in the residential portion that are not included as part of the project description. However, the sentence does not indicate that the residential development would provide additional park facilities. It states that new recreational facilities may be provided pursuant to the County's

code requirement, which could be on-site or elsewhere. No further clarification is necessary.

> Page 5.7-5, Section 5.7.5, Cumulative Impacts, Impact on Existing Recreation Facilities: "Demand for new recreational facilities is typically generated by population growth. Development of 160 residential units, or an increase of 464 residents, in Hacienda Heights could result in additional parkland demand for 1.86 acres. Pursuant to the Los Angeles County Code Sections 21.24.340 and 21.28.140, new recreational facilities may be provided on-site or elsewhere through the payment of in lieu fees. Environmental impacts from providing new off-site recreation facilities are speculative at this time because no sites have been identified; however, construction and operation may result in adverse physical impacts."

AA1-7 The commenter is unclear whether on-site parkland or in-lieu fee payment would be provided. No development plan or site design is available for the residential portion of the proposed project; therefore, it is unknown at this time if parkland or in-lieu fees would be provided. The residential development will require separate discretionary approval from the County, at which time the residential portion will be required to comply with the Los Angeles County Code Sections 21.24.340 and 21.28.140 and provide on-site parkland or pay in-lieu park fees.

AA1-8 Comment noted. The sentence has been modified for clarification. The modification would not change the conclusion of the analysis.

Page 5.7-6, Section 5.7.5, Cumulative Impacts, Impact of New Recreation Facilities, 2nd paragraph. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known <u>underline</u>.

Although ~~the District~~ <u>development of the K-8 school</u> is not required to comply with the Los Angeles County Code Sections 21.24.340 and 21.28.140 to provide additional facilities, the additional use may overtax existing fields, requiring development of additional facilities. The proposed project may result in a significant cumulative impact individually and cumulatively.

LETTER AA2 – County of Los Angeles Fire Department (4 pages)

AA2

COUNTY OF LOS ANGELES
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401
www.fire.lacounty.gov

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PURCHASING DEPT.
APR 01 2021
RECEIVED

March 19, 2021

Joel Duarte, Director of Purchasing and Warehouse
Hacienda La Puente Unified School District
Planning Department
15959 East Gale Avenue
City of Industry, CA 91716

Dear Mr. Duarte:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "WEDGEWORTH K-8 SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT," IS PROPOSING TO REDEVELOP A 20-ACRE PROJECT SITE IN PHASES TO CONSTRUCT A NEW EXPANDED K-8 SCHOOL SERVING 1,200 STUDENTS ON 10 ACRES IN PHASE 1 AND UP TO 160 RESIDENTIAL UNITS IN PHASE 2, THE 20-ACRE SITE CONSISTS OF THE EXISTING WEDGEWORTH ELEMENTARY SCHOOL WITH A MAXIMUM STUDENT ENROLLMENT CAPACITY OF 600 K-5 STUDENTS, FOUR BASEBALL FIELDS WITH NIGHTTIME LIGHTING FOR TWO OF THE FIELDS, AND VACANT LOT, LOCATED AT 16949 WEDGEWORTH DRIVE, HACIENDA HEIGHTS,
FFER 2021001802

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

We have no comments. AA2-1

For any questions regarding this response, please contact Kien Chin, Planning Analyst, at (323) 881-2404 or Kien.Chin@fire.lacounty.gov.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	CARSON	EL MONTE	INGLEWOOD	LAWNDALE	PICO RIVERA	SIGNAL HILL
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BALDWIN PARK	COMMERCE	HAWAIIAN GARDENS	LA HABRA	MALIBU	ROLLING HILLS	TEMPLE CITY
BELL	COVINA	HAWTHORNE	LA MIRADA	MAYWOOD	ROLLING HILLS ESTATES	VERNON
BELL GARDENS	CUDAHY	HERMOSA BEACH	LA PUENTE	NORWALK	ROSEMEAD	WALNUT
BELLFLOWER	DIAMOND BAR	HIDDEN HILLS	LAKEWOOD	PALMDALE	SAN DIMAS	WEST HOLLYWOOD
BRADBURY	DUARTE	HUNTINGTON PARK	LANCASTER	PALOS VERDES ESTATES	SANTA CLARITA	WESTLAKE VILLAGE
CALABASAS		INDUSTRY		PARAMOUNT		WHITTIER

3. Response to Comments from the Recirculated DEIR

Juan Duarte, Director of Purchasing and Warehouse
March 19, 2021
Page 2

LAND DEVELOPMENT UNIT:

1. Fire Apparatus Access Roads must be installed and maintained in a serviceable manner prior to and during the time of construction. Fire Code 501.4.

2. All fire lanes shall be clear of all encroachments and shall be maintained in accordance with the Title 32, County of Los Angeles Fire Code.

3. The required 20-foot wide driving surface shall be increased to 26 feet when fire hydrants are required. The 26-foot width shall be maintained for a minimum of 25 linear feet on each side of the hydrant location.

4. Provide a minimum unobstructed width of 28 feet, exclusive of shoulders and an unobstructed vertical clearance "clear to sky" Fire Department vehicular access to within 150 feet of all portions of the exterior walls of the first story of the building, as measured by an approved route around the exterior of the building when the height of the building above the lowest level of the Fire Apparatus Access Road is more than 30 feet high, or the building is more than three stories. The access roadway shall be located a minimum of 15 feet and a maximum of 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. Fire Code 503.1.1 and 503.2.2.

5. Provide approved signs or other approved notices or markings that include the words "NO PARKING - FIRE LANE." Signs shall have a minimum dimension of 12 inches wide by 18 inches high and have red letters on a white reflective background. Signs shall be provided for Fire Apparatus Access Roads, to clearly indicate the entrance to such road, or prohibit the obstruction thereof and at intervals, as required by the Fire Inspector. Fire Code 503.3.

6. The dimensions of the approved Fire Apparatus Access Roads shall be maintained as originally approved by the fire code official. Fire Code 503.2.2.1.

7. Fire Apparatus Access Roads shall be provided with a 32-foot centerline turning radius. (Fire Code 503.2.4) Indicate the centerline, inside and outside turning radii for each change in direction on the site plan.

8. Dead-end Fire Apparatus Access Roads in excess of 150 feet in-length shall be provided with an approved Fire Department turnaround. Fire Code 503.2.5.

9. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles, or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Section 503.2.1 shall be maintained at all times. Fire Code 503.4.

10. Traffic Calming Devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official. Fire Code 503.4.1.

AA2-2

11. All required PUBLIC fire hydrants shall be installed, tested, and accepted prior to beginning construction. Fire Code 501.4.

12. All private on-site fire hydrants shall be installed, tested, and approved prior to building occupancy. Fire Code 901.5.1.

13. Provide a Form 196 signed and completed by the local water purveyor.

14. Show all existing public fire hydrants to within 300' of all property lines.

15. Provide type of construction, square footage, and indicate the installation of automatic fire sprinklers per NFPA. The requested information will be used to determine the required fire flow.

AA2-2 Cont'd

For any questions regarding the report, please contact Joseph Youman at (323) 890-4243 or Joseph.Youman@fire.lacounty.gov.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

AA2-3

Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site.

The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

AA2-4

HEALTH HAZARDOUS MATERIALS DIVISION:

The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department advises that the Cal-EPA Department of Toxic Substances Control would be the lead environmental oversight agency for the school district if environmental contamination impacts were encountered at the project site. HHMD has no additional comments for the project at this time.

AA2-5

3. Response to Comments from the Recirculated DEIR

Juan Duarte, Director of Purchasing and Warehouse
March 19, 2021
Page 4

Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330

Very truly yours,

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

AA2 Response to Comments from Ronald M. Durbin, Chief, Forestry Division, Prevention Services Bureau, Los Angeles Fire Department, dated March 19, 2021.

AA2-1 Planning Division of the Fire Department has no comments.

AA2-2 Comments provide Fire Code requirements and site design requirements related to fire safety. The District is required to implement the listed design features for review and approval by the Fire Department prior to approval of the final site plan. Comments do not relate to the adequacy of the DEIR. No further response is necessary.

AA2-3 The comment states that the statutory responsibilities of the Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance, and that potential impacts in these areas should be addressed. Impacts to the listed environmental issues were addressed in the originally circulated DEIR, which was released on December 5, 2019, and closed on January 21, 2020.

AA2-4 The comment indicates that if oak trees exist on-site, a permit shall be obtained per the Los Angeles County Oak Tree Ordinance. As stated in the Initial Study Section 3.4(e) (Appendix A to the originally circulated DEIR), the project site does not have any oak trees, and development of the proposed project would not conflict with any terms of the Oak Tree Permits, Los Angeles County Code, Sections 22.56.2050 et seq. No further response is necessary.

AA2-5 The Health Hazardous Materials Division of the Los Angeles County Fire Department indicated that they have no comment.

3. Response to Comments from the Recirculated DEIR

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LETTER AA3 – California Department of Transportation (2 pages)

AA3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7 – Office of Regional Planning
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-0475
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

April 5, 2021

Joel Duarte
Hacienda La Puente Unified School District
15959 East Gale Avenue
Industry, CA 91716

RE: Wedgeworth K-8 School and Residential Development – Recirculated Draft Environmental Impact Report (DEIR)
GTS # 07-LA-2019-03501
SCH # 2019071040
Vic. LA-60/PM: 17.673

Dear Joel Duarte:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Hacienda La Puente Unified School District is proposing to redevelop a 20-acre project site in phases to construct a new expanded K-8 school serving 1,200 students on 10 acres in Phase 1 and up to 160 residential units in Phase 2. The 20-acre site consists of the existing Wedgeworth Elementary School with a maximum student enrollment capacity of 600 K-5 students, four baseball fields with nighttime lighting for two of the fields, and a vacant lot. The Hacienda La Puente Unified School District (District) is the lead agency under the California Environmental Quality Act (CEQA). AA3-1

The nearest State facility to the proposed project is State Route 60 (SR-60), which is located adjacent to the project. As discussed in the recirculated DEIR, since the original DEIR was released, Senate Bill (SB) 743 has taken effect. SB 743 mandates that Vehicle Miles Traveled (VMT) be used as the primary metric in identifying transportation impacts of all future development projects under CEQA starting July 1, 2020. Thus, Caltrans has reviewed the recirculated DEIR from a VMT rather than a Level of Service perspective.

Regarding the VMT analysis for the residential development portion of the proposed project, Caltrans supports the implementation of Transportation Demand Management (TDM) measures to reduce the VMT impact of this project portion to the greatest extent possible. The school district may wish to consider requiring a mitigation monitoring program from the developer, which could be used to evaluate whether the specific TDM measures chosen decreased VMT. If they have not, the TDM measures could then be adjusted accordingly. AA3-2

Regarding the VMT analysis for the school expansion portion of the project, it states "Since the school boundary of Wedgeworth School after expansion is unknown, it is assumed that these 600 students who should go to Cedarlane Academy before the school expansion will be enrolled in Wedgeworth K-8 School after the school expansion." Please clarify why it was assumed that all 600 new students will come from Cedarlane Academy because the boundary of new school is unknown. AA3-3

The VMT analysis also states, "the project would not have an influence on VMT associated with students attending from outside District boundaries." Please provide a reason for this. AA3-4

"Provide a safe and reliable transportation network that serves all people and respects the environment."

3. Response to Comments from the Recirculated DEIR

Joel Duarte
April 5, 2021
Page 2 of 2

The following information is included for your consideration.

For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. You can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf. This TISG replaces Caltrans' 2002 Guide for the Preparation of Traffic Impact Studies and is largely based on the OPR 2018 Technical Advisory. AA3-5

Also, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. Caltrans recommends that the project limit construction traffic to off-peak periods to minimize the potential impact on State facilities. Caltrans looks forward to reviewing the construction worksite staging and traffic control plan. We also appreciate the following statement: "The proposed project will be required to comply with the County-approved plan measures, or Caltrans-approved plan measures if any state facilities are affected." AA3-6

If you have any questions regarding these comments, please contact project coordinator Emily Gibson, at Emily.Gibson@dot.ca.gov and refer to GTS# 07-LA-2019-03501.

Sincerely,

Anthony Higgins for

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

"Provide a safe and reliable transportation network that serves all people and respects the environment."

AA3 Response to Comments from Miya Edmonson, IGR/CEQA Branch Chief, California Department of Transportation, dated April 5, 2021.

AA3-1 The letter provides introduction and states that the nearest state facility to the project site is State Route 60 (SR-60). The letter acknowledges that Senate Bill 743 (SB 743) took effect and states that Caltrans reviewed from a VMT perspective rather than a LOS perspective. No response is necessary.

AA3-2 Comment noted. The residential portion of the project would require additional discretionary approval and the appropriate TDM measures would be identified at that time, if applicable.

AA3-3 The comment asks to clarify why it was assumed that all 600 new students will come from Cedarlane Academy when the boundary of new school is unknown. Because the boundary of the new K-8 school has not been determined, and Cedarlane Academy covers the attendance boundary of Wedgeworth Elementary School, the traffic engineer determined that it would be reasonable to use the attendance boundaries for Cedarlane Academy to evaluate VMT impact. The new K-8 school would allow students currently attending Wedgeworth ES to continue to attend the same school rather than going to other middle schools, and Wedgeworth ES feeds to Cedarlane Academy after graduation unless students request intra- or inter-district transfers. The proposed school is intended to serve local students although the District allows intra- and inter-district transfers if there's capacity. The number of intra- and inter-district transfer students fluctuate, and approximately 16 percent (92 students) and 1 percent (8 students) were inter- and intra-district students at the time of NOP issuance in 2019. Students from outside the Wedgeworth ES and Cedarlane Academy attendance boundaries would have greater trip lengths; however, it is assumed that these trips are already occurring elsewhere in the community to attend other schools, and the proposed project would not necessarily create new trips. The District does not know where these future inter-district transfer students are attending schools currently. Therefore, it is anticipated that some of the redistributed trips would have greater trip lengths and some would have shorter lengths by attending the proposed school. Approximately 16 percent of these trips are not anticipated to have substantial VMT impact.

AA3-4 The project would not have an influence on VMT associated with students attending from outside District boundaries because the distance from Cedarlane Academy to Wedgeworth ES is approximately 0.6 mile. For a person coming from outside the District boundaries, this travel distance would be negligible.

AA3-5 The letter provides information on determining transportation impact in terms of VMT on the State Highway System for informational purposes. No further response is necessary.

3. Response to Comments from the Recirculated DEIR

AA3-6 As commented, any transportation of heavy construction equipment and/or materials which requires an oversized-transport vehicle on state highways will require a Caltrans transportation permit. The construction traffic would avoid peak period traffic to minimize the potential impact on state facilities as appropriate. The proposed project will be required to comply with the County-approved plan measures or Caltrans-approved plan measures if any state facilities are affected.

3.2 INDIVIDUAL RESPONSE TO COMMENTS (RDEIR COMMENTS)

3. Response to Comments from the Recirculated DEIR

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LETTER RR1 – **Edward Abbott** (2 pages)

RR1

From: edward abbott
To: Wedgeworth School Project
Subject: Wedgeworth School
Date: Tuesday, February 16, 2021 10:14:06 PM

Why do we even need another k-8 when you have one just up the street RR1-1

Sent from Yahoo Mail on Android

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

3. Response to Comments from the Recirculated DEIR

RR1 Response to Comments from Edward Abbott, dated February 16, 2021.

RR1-1 The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR2 – Etapkwan (2 pages)

RR2

From: [redacted]
To: Joel Duarte
Cc: Info HLPUSD
Subject: RDEIR comments
Date: Friday, April 2, 2021 8:33:32 PM

Good evening,

I am commenting on the RDEIR. I have concerns regarding the traffic and congestion at Pepperbrook Way and Azusa Ave. Currently, when I drive down Azusa Ave from Colima in the morning, there is a horrible amount of traffic. It can take me up to 1/2 an hour just to travel from Colima down to Gale. Building a K-8 school will only increase the traffic already present. I don't know that adding turn lanes is going to help with the traffic there. RR2-1

A new school isn't necessary when the current program can be moved to another location. RR2-2
Most of the students there are from intra district transfers anyway, so moving the students to another location shouldn't matter. RR2-3

I also have a huge problem with the district being so quick to spend $60+ million dollars when special education won't even pay for a few hours a year for an outside specialist that is **needed** for a student. Special education parents need to fight to get services covered that their children need, and here the district has no qualms with recklessly spending millions of dollars for something that isn't needed, just wanted. Who wouldn't want a shiny new school or the top model car? But that doesn't mean that it is *necessary*. What is necessary if fixing the current problems at that school and preventing over enrollment there. RR2-4

This entire situation absolutely infuriates me to say the least. Is this a fair distribution of funds to all the students in the district? Absolutely *not*. ***Especially when some parents need to fight to get reasonable services that their children need to access their education, and are being denied.*** The district is not in this for the benefit of all the kids. *That is perfectly clear.*

Please acknowledge receipt of this email as received.

Thank you.

--
Take Care,

3. Response to Comments from the Recirculated DEIR

RR2- Response to Comments from Etapkwan, dated April 2, 2021.

RR2-1 The commenter is concerned about the traffic and congestion at Pepperbrook Way and Azusa Avenue.

The RDEIR found the congestion impact at Pepperbrook Way and Azusa Avenue intersection impact to be significant and unavoidable. Although a mitigation measure has been provided, implementation of the mitigation cannot be guaranteed because of jurisdictional issue. Providing the recommended improvements at this intersection is not under the authority of the District. Therefore, a Statement of Overriding Consideration will be prepared and adopted as part of the project approval once the FEIR is certified. A SOC will need to find that the benefits of a project outweigh the unavoidable adverse environmental effects. However, it should be noted that pursuant to the recent changes in CEQA Guidelines and subsequent court decision, traffic delays at intersections measured in level of service (LOS) or similar measures of vehicular capacity or traffic congestion are no longer considered a significant impact on the environment. In January 2020, State courts stated that under Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects. See also CEQA Guidelines Section 15064.3(a).

Therefore, although the proposed project would result in LOS delays at #13 Azusa Avenue at Pepper Brook Way, this LOS-related impact is no longer considered a significant impact. However, in order to disclose the project impact and the District's commitment to mitigate the school's impact, the RDEIR determined the LOS impact to be significant and unavoidable, and the District will coordinate with the County to mitigate the traffic impact.

RR2-2 The comment states that a new school is not necessary when the current program can be moved to another location. Two of the project objectives relate to serving the existing Wedgeworth ES students. One is to replace Wedgeworth Elementary School, built as a temporary facility and now in poor condition, with a modern, educationally appropriate campus for 1,200 K-8 students, and the second is to avoid the need to move students off-site during construction by maintaining the existing campus until the new campus opens. Moving the existing school program to another location would not meet the District's objectives.

RR2-3 The comment asserts that most of the students are from intra-district transfers, so moving the students to another location should not matter.

Pursuant to the CEQA Guidelines Section 15125(a)(1), the baseline for the RDEIR analysis is at the time of the Notice of Preparation is published, which is July 2019. CEQA Guidelines Section 15125(a)(1) states: "Generally, the lead agency should describe physical environmental conditions as they exist **at the time the notice of preparation is**

published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective."

At the time of NOP release, 92 of the total 594 students, or approximately 16 percent, came from outside the District boundaries (inter-district), and 8 students, or about 1 percent, came from outside the Wedgeworth ES boundaries but within the District (intra-district). Therefore, most of the students are not from intra-district transfers, and moving the students to another location matters.

RR2-4 The commenter has a problem with the District spending over $60 million on the proposed project when the funding for special education is limited. The comment is an opinion and does not address physical environmental impacts or the adequacy of the RDEIR. Comments are noted and will be forwarded to the Board of Education for review and consideration.

3. Response to Comments from the Recirculated DEIR

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LETTER RR3 – Gabriela Navar (1 page)

RR3

From: Gabriela Navar [redacted]
Sent: Monday, April 5, 2021 7:24 AM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: Comments on RDEIR

Confirmation of Receipt is being requested.

To Whom it May Concern:

Below are my comments in regards to the RDEIR.
First off the information pertaining to the history of the fields is incorrect.
In 1978 Hacienda Highlander Little League was allowed to access the vacant field not Hacienda Height Little League. Hacienda Heights Little League's home field was Kwis Elementary School in 1978. The statement that the fields were used at no charge is incorrect since the biggest field was built in accordance with CIF rules so that Glen A. Wilson High School's baseball team can practice and play there. They played night games on those fields at no charge. The Hacienda Highlander Little League would pay the utilities for these fields including electricity. The initial understanding that field access would only be allowed until the District decides to build a permanent school facility is incorrect. The school board in 1977 instructed the school district to provide recommendations that utilized the existing school site as to 1) keep in mind the education program, 2) the most desirable dimensions for development 3) to provide Little League with adequate area for their needs. This information can be confirmed in the approved minutes from December 6, 1977. On November 17th, 1977 the HLPUSD School Board approved for Hacienda Highlander Little League to use a portion of the Wedgeworth site for the construction of baseball diamonds. The words temporary were never used. It also stated that this was subject to approval by appropriate agencies. Why would people invest so much money, time and go through the trouble of getting appropriate agency approvals on something that was going to be temporary and demolished? RR3-1

It was very upsetting to hear of the possibility of Cedarlane being used for 2 baseball fields. Has the community residing around Cederlane been informed of this possibility? RR3-2 When I was a member of the Hacienda Heights Fastpitch Softball Program there were constant issues with fields at Cedarlane. RR3-3 One not being able to use the fields until after 5 pm due to the after-school programs on Cedarlane's campus. This restriction would not allow the program enough time to practice or play due to not having access to lights. The second issue was not being allowed to park on Cedarlane's campus parking lot on Saturdays due to the Saturday school program. The last issue that I am aware of is not being able to park on one side of the street due to residential complaints. RR3-4

Gabriela Navar

3. Response to Comments from the Recirculated DEIR

RR3 Response to Comments from Gabriela Navar, dated April 5, 2021.

RR3-1 The commenter states that the information pertaining to the history of the field is incorrect. Comments are noted and the text has been modified as below. However, the comment does not change the analysis or conclusion of the RDEIR as it relates to the physical environment of the existing baseball fields and the mitigation.

Page 5.7-1, Section 5.7.1.2, Existing Conditions, Project Site. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

The project site is developed with the existing Wedgeworth Elementary School, four baseball fields used by Hacienda ~~Heights~~Highlander Little League, and a vacant lot. Wedgeworth ES has hardcourts, a kindergarten playground, and turf playfields. The baseball fields and supporting facilities include small bleachers, two batting cages, dugouts, press boxes, storage containers, and parking, and two of the four baseball fields are equipped with nighttime lighting.

~~Hacienda Heights~~ Little League originally played at Salto Field in the 1970s. However, when that District property was turned over to the County, baseball could no longer be played there. In April 1978, Hacienda Heights Little League was allowed access to the vacant field owned by the District until a new permanent school is constructed there, which is the current project site. Wedgeworth ES was constructed in the early 1970s as a temporary facility for instruction until a permanent school could be built. However, by the mid-1970s, student enrollment declined, and the decision to build a permanent facility was postponed. Since 1978 the District-owned fields have been used by Hacienda Heights Little League at no charge, with the initial understanding that field access would only be allowed until the District decides to build a permanent school facility. The project site is not zoned for public or recreational facilities, and the County's Parks and Recreation Department does not list these baseball fields as part of the County facilities.

RR3-2 The notice of availability (NOA) was sent to the property owners and occupants within a 500-foot radius of the Cedarlane Academy, informing them of the proposed project.

RR3-3 As stated in the RDEIR, the two ballfields at Cedarlane Academy would be available for the Little League use during nonschool hours. The District consulted with Cedarlane Academy's principal to confirm that the proposed mitigation at Cedarlane Academy would not interfere with the school's after-school programs. The ballfields at Cedarlane Academy would not be lighted and used only during daylight hours. Two unlit ballfields at Cedarlane Academy will replace two unlit ballfields at Wedgeworth ES. The non-school hours would start around 4 pm or before to allow for a game during daylight hours.

RR3-4 The Cedarlane Academy parking and street parking on Fieldgate Avenue along the school property line would be available to provide adequate parking for the Little League use.

Other field areas could be used by other programs. However, the existing campus parking and street parking are anticipated to provide adequate parking capacity to accommodate the Little League use.

3. Response to Comments from the Recirculated DEIR

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LETTER RR4 – Haiyan Li (2 pages)

RR4

Comments to the WW RDEIR from Helen Li 02 April, 2021

From: Haiyan Li <[redacted]
Date: 4/4/21 9:56 AM (GMT-08:00)
To: Joel Duarte <jduarte@hlpusd.k12.ca.us>
Subject: Comments for WW RDEIR

Mr. Duarte,

Hope you're doing well.

I mailed my comments to the school district office location last Friday. According to Dr. Jimenez's latest email, we can also email you our comments. I'm sending a copy to you via email to make sure it gets to you on time. Please see attached.

Please provide a confirmation of receipt of my email and the attached comments.

Thank you,

Helen

The RDEIR clearly identified "Alternative 1 – No Project/Existing School Improvement" as the most environmentally superior alternative and would have the least environmental impact. I believe this alternative makes the most financial and environmental sense as the best choice for the district and community. RR4-1

Alternative 2 & 3 are just ridiculous even with the implementation of the mitigation measures. Under these two alternatives, the Little League will be split into two locations and that doesn't make sense at all. These two alternatives never take into consideration of the infrastructure, personnel, and resource needs for the Little League recreation. With the fields being split into two places, there will have to be double quantity of supporting infrastructures (administration rooms, snack shack, bathrooms, etc.) and double number of personnel to support those supporting functions. These alternatives also never considered the families that have multiple children who participate games under different age groups at the same time. Many family can have only one parent taking their kids to the games. When the games are held at Highlander, it's manageable. The parent can monitor their kids by walking back and forth between the four fields. If the games are to be held in different locations, how do those families participate the recreation without impact? Besides, there're barely any parking space at those two replacement locations identified under mitigation measure REC-1 and REC-2. The EIR seems to only focus on cold numbers, not the real negative impact caused to the community. RR4-2 RR4-3

Alternative 4 doesn't make financial sense to the district and community at all. RR4-4

Regarding Page 211, "Table 7-3 Ability of Each Alternative to Meet the Project Objectives and Avoid Significant Impacts", whose objectives are they anyway? They might have been the objectives of the previous board without consideration of the entire district's needs and the disparity concern. With many schools' infrastructures also in poor condition, it is not fair and reasonable to focus on building one modern and expanded school at the expense of the entire community. The RDEIR failed to address the controversy of disparity that was brought up during last review. Even if this controversy does not fall within the Environmental Impact scope, this is a major issue that the district should consider while making decision. RR4-5 RR4-6

3. Response to Comments from the Recirculated DEIR

Comments to the WW RDEIR from Helen Li 02 April, 2021

Regarding Page 222, "Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment? Redevelopment of the existing elementary school to a K-8 school with increased student enrollment capacity would continue to serve the existing school population in the District boundary and would not facilitate economic effects that could affect the environment."
These redevelopment and expansion would potentially affect the environment negatively and significantly if surrounding schools face closure due decreased enrollment caused by the expansion of Wedgeworth School. The RDEIR failed to consider this factor. RR4-7

In summary, Alternative 1 – No Project/Existing School Improvement is the best choice for the community and the school district. We should not waste any more time, money, and energy to continue the discussion of this project. Rather, we should focus on how to immediately address and fix the infrastructure that are in poor condition at Wedgeworth and all the schools in the district, and focus on how to provide quality programs and learning experiences to all the students throughout the entire district. That's how to build a stronger community and a top-notch school district that will attract more students. RR4-8

RR4 Response to Comments from Haiyan Li, dated April 2, 2021.

RR4-1 The comment expresses an opinion that No Project Alternative is the best choice for the District and community as it makes the most financial and environmental sense. No further response is necessary.

RR4-2 The comment states that Alternatives 2 and 3 do not make sense because they would require doubling of supporting infrastructure and support personnel, and parents with multiple children participating under different age groups would not be able to manage. The District reviewed a reasonable range of project alternatives that can reduce environmental impacts while meeting project objectives. Under Alternative 2, the Little League would use the new school's restroom facility, and no new concession building would be constructed on the Wedgeworth site. Supporting infrastructure would only be constructed at the Kwis replacement fields site. And under Alternative 3, no restroom/concession building would be constructed on Cedarlane replacement fields site, and the Little League would be using the existing restroom facility at Cedarlane Academy. While parents would have to juggle between two field sites, they are feasible alternatives that would not result in substantial environmental impacts. Also note that the lack of concession and administrative spaces are social difficulties, and not environmental impacts to be evaluated in the EIR. Also see Response RR4-6.

RR4-3 Both replacement field sites provide on-campus parking and on-street parking for the Little League use.

RR4-4 The comment states that Alternative 4 does not make financial sense to the District and community. Financial consideration of the alternatives or mitigation measures is not under the purview of CEQA analysis but will be considered by the Board of Education.

RR4-5 Project objectives have been established by the District.

RR4-6 Each topical analysis in the EIR evaluates whether the proposed project may have a "significant effect on the environment." CEQA Section 15131(a) states that

> Economic or social effects of a project *shall not* be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the *physical changes*." [Emphasis added.]

Therefore, the issue of disparity within district schools is not under the purview of CEQA analysis and was not included in the RDEIR. The comment will be forwarded to the Board of Education for review and consideration.

3. Response to Comments from the Recirculated DEIR

RR4-7 The comment states that the proposed project would potentially affect the environment negatively if surrounding schools face closure due to decreased enrollment caused by the expansion of Wedgeworth School. This comment is speculative and without evidence. The comment did not provide any substantial evidence supporting the claim that the proposed expansion of Wedgeworth School would result in decreased enrollment at other schools. Per CEQA, the RDEIR does not need to consider generalized and unsupported claims in its analysis.

RR4-8 The comment provides an opinion and does not address physical environmental impact of the proposed project or inadequacy of the RDEIR. Comment will be forwarded to the Board of Education for review and consideration.

LETTER RR5 – Helen Li (1 page)

RR5

Comments to the WW RDEIR from Helen Li **02 April, 2021**

The RDEIR clearly identified "Alternative 1 - No Project/Existing School Improvement" as the most environmentally superior alternative and would have the least environmental impact. I believe this alternative makes the most financial and environmental sense as the best choice for the district and community. RR5-1

Alternative 2 & 3 are just ridiculous even with the implementation of the mitigation measures. Under these two alternatives, the Little League will be split into two locations and that doesn't make sense at all. These two alternatives never take into consideration of the infrastructure, personnel, and resource needs for the Little League recreation. With the fields being split into two places, there will have to be double quantity of supporting infrastructures (administration rooms, snack shack, bathrooms, etc.) and double number of personnel to support those supporting functions. These alternatives also never considered the families that have multiple children who participate games under different age groups at the same time. Many family can have only one parent taking their kids to the games. When the games are held at Highlander, it's manageable. The parent can monitor their kids by walking back and forth between the four fields. If the games are to be held in different locations, how do those families participate the recreation without impact? Besides, there're barely any parking space at those two replacement locations identified under mitigation measure REC-I and REC-2. The EIR seems to only focus on cold numbers, not the real negative impact caused to the community. RR5-2 RR5-3

Alternative 4 doesn't make financial sense to the district and community at all. RR5-4

Regarding Page 211, "Table 7-3 Ability of Each Alternative to Meet the Project 0:bjectives and Avoid Significant Impacts", whose objectives are they anyway? They might have been the objectives of the previous board without consideration of the entire district's needs and the disparity concern. With many schools' infrastructures also in poor condition, it is not fair and reasonable to focus on building one modem and expanded school at the expense of the entire community. The RDEIR failed to address the controversy of disparity that was brought up during last review. Even if this controversy does not fall within the Environmental Impact scope, this is a major issue that the district should consider while making decision. RR5-5 RR5-6

Regarding Page 222, "Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment? Redevelopment of the existing elementary school to a K-8 school with increased student enrollment capacity would continue to serve the existing school population in the District boundary and would not facilitate economic effects that could affect the environment."
These redevelopment and expansion would potentially affect the environment negatively and significantly if surrounding schools face closure due decreased enrollment caused by the expansion of Wedgeworth School. The RDEIR failed to consider this factor. RR5-7

In summary, Alternative 1 - No Project/Existing School Improvement is the best choice for the community and the school district. We should not waste any more time, money, and energy to continue the discussion of this project. Rather, we should focus on how o immediately address and fix the infrastructure that are in poor condition at Wedgeworth and all the schools in the district, and focus on how to provide quality programs and learning experiences to all the students throughout the entire district. That's how to build a stronger community and a top-notch school district that will attract more students. RR5-8

3. Response to Comments from the Recirculated DEIR

RR5 Response to Comments from Helen Li, dated April 2, 2021.

RR5-1 See Response RR4-1 above.

RR5-2 See Response RR4-2 above.

RR5-3 See Response RR4-3 above.

RR5-4 See Response RR4-4 above.

RR5-5 See Response RR4-5 above.

RR5-6 See Response RR4-6 above.

RR5-7 See Response RR4-7 above.

RR5-8 See Response RR4-8 above.

LETTER RR6 – Highlander Baseball Complex Founders (2 pages)

RR6

Hacienda La Puente Unified School District
Joel Duarte, Director of Purchasing and Warehouse
15959 East Gale Avenue
City of Industry, California 91716-0002
Re: EIR Draft Includes False, Deceiving, & Dishonest Information

To whom it may concern,

The EIR draft information included herein was presented to the Hacienda Heights community under false pretenses. The dishonest information was fabricated by the HLPUSD to deceive, influence, and drive a false narrative in favor of destroying the privately funded, permanent baseball infrastructure, known to our community as The Highlander Baseball Complex. I along with the founders personally know the information presented is false because we lived it for over 45 years as community members in Hacienda Heights. We are the founding members of The Highlander Baseball Complex. I was a player, manager, coach & umpire for the Hacienda Highlander Little League and a three year player on the Wilson Varsity Baseball team. I was also the varsity assistant coach for the Wilson baseball team under Walt Martin. We were there when all of this occurred, we lived it!

RR6-1

It is evident that our community members were purposely misinformed & deceived in an effort to discredit the existence of a staple in our community.

On behalf of The Founding Members of the Highlander Baseball Complex, I demand a correction and immediate removal of the dishonest information included in the EIR draft. It's important that the correct details be made available for consideration of this $55 Million Dollar project. Failure to do so will lead to irreversible changes to our community that were fueled by dishonest information produced and presented by the HLPUSD. Not to mention, the probability of legal challenges by The Founding Families of The Highlander Baseball Complex.

Our community must be allowed to review the true FACTS before they make a decision to support or reject this project. We demand documentation to support ALL claims made by the HLPUSD. Especially the meeting minutes which include all discussions leading to the original agreement between then acting president John Shutes of the Highlander Baseball Complex and the HLPUSD. Any existing approval for the Wedgeworth project which included fabricated and deceiving facts and omitted the disclosure of the original terms and conditions must reverse course and be rejected!

WEDGEWORTH K - 8 SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT RECIRCULATED DRAFT EIR HACIENDA LA PUENTE UNIFIED SCHOOL DISTRICT

5. Environmental Analysis

RECREATION

Hacienda Heights Little League originally played at Salto Field in the 1970s. *(Correction, HHtsLL NEVER played at "Salto Fields". In Fact HHtsLL played at Manzanita Park in the 70s.)* However, when that District property was turned over to the County, baseball could no longer be played there. In April 1978, Hacienda Heights Little League was allowed access to the vacant field owned by the District *(Correction, HHtsLL was NEVER granted access to the vacant field owned by the district)* until a new permanent school is constructed there, *(Correction, property use condition to build a permanent infrastructure, Snack shack and 4 fields, was NEVER to terminate or be revoked until a new permanent school is constructed)* which is the current project site. Wedgeworth ES was constructed in the early 1970s as a temporary facility for instruction until a permanent school could be built. However, by the mid-1970s, student enrollment declined, and the decision to build a permanent facility was postponed. Since 1978 the District owned fields *(Correction, The District does NOT own*

3. Response to Comments from the Recirculated DEIR

the baseball fields) have been used by Hacienda Heights Little League at no charge, *(Correction, HHtsLL never used the fields in the 70s AND 80s, However HHLL did and paid for all of the expenses when G.A. Wilson played at the HBC as a condition for its use)* with the initial understanding that field access would only be allowed until the District decides to build a permanent school facility. *(FALSE)* The project site is not zoned for public or recreational facilities, *(It was clear that the site was to be used for a permanent baseball infrastructure, its been used that way for 40 years, when was it rezoned?)* and the County's Parks and Recreation Department does not list these baseball fields as part of the County facilities. *(why would they? They're not on county property and hlpusd to their own admission allowed access)*

RR6-1
Cont'd

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Respectfully,
Highlander Baseball Complex Founders
Fernando Solis (Founding Member)
John Shutes & Family (Founder)
(Co-Founders)
Jim Hicks & Family, Mario Iriarte & Family,
Ken Currie & Family, Ron Struble & Family, Roy Alberoni & Family, Phil Stirling & Family,
Chuck Deleo & Family, George Gonzales & Family, Larry Jung & Family, John Kupka & Family,
Chuck Lohr & Family, Bill Martin & Family, Jeff Young & Family, Mike Cusey & Family,
Maury Edwards & Family, Ray Shreenan & Family Dave Semmer & Family, Douglas Yee & Family
Rick Bogard & Family, Del Skinner & Family,
(Founding Members)
Eric Spiegel & Family, Jim Kwon & Family, David Bond & Family, Darrin Blizzard & Family,
Andre Vicario & Family, Todd Baker & Family, Alex Fuchs & Family, David Skalsky & Family,
Mark Oliveras & Family, George Mendez & Family, Don Barker & Family, Brian Koyama & Family,
Steve Lopez & Family, Mario Salazar & Family, Daniel Trinkle & Family, James Hoppe & Family,
Richard Trujillo & Family, Paul Arreola & Family,

RR6 Response to Comments from Highlander Baseball Founders, dated April 2, 2021.

RR6-1 The comment asserts that the RDEIR provides false information related to the Little League baseball fields. The RDEIR evaluates environmental impacts based on the existing conditions and has identified removal of four baseball fields as a significant impact that requires mitigation. Therefore, the text pertaining to the history of the baseball fields has been removed to reduce any misunderstanding and discrepancies pertaining to that history. This revision to the RDEIR would not impact the conclusion of the analyses in any way.

Page 5.7-1, Section 5.7.1.2, Existing Conditions, Project Site. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

The project site is developed with the existing Wedgeworth Elementary School, four baseball fields used by Hacienda ~~Heights~~Highlander Little League, and a vacant lot. Wedgeworth ES has hardcourts, a kindergarten playground, and turf playfields. The baseball fields and supporting facilities include small bleachers, two batting cages, dugouts, press boxes, storage containers, and parking, and two of the four baseball fields are equipped with nighttime lighting.

~~Hacienda Heights Little League originally played at Salto Field in the 1970s. However, when that District property was turned over to the County, baseball could no longer be played there. In April 1978, Hacienda Heights Little League was allowed access to the vacant field owned by the District until a new permanent school is constructed there, which is the current project site. Wedgeworth ES was constructed in the early 1970s as a temporary facility for instruction until a permanent school could be built. However, by the mid-1970s, student enrollment declined, and the decision to build a permanent facility was postponed. Since 1978 the District-owned fields have been used by Hacienda Heights Little League at no charge, with the initial understanding that field access would only be allowed until the District decides to build a permanent school facility. The project site is not zoned for public or recreational facilities, and the County's Parks and Recreation Department does not list these baseball fields as part of the County facilities.~~

3. Response to Comments from the Recirculated DEIR

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LETTER RR7 – Jack Hacienda (5 pages)

RR7

From: Jack Hacienda [redacted]
Sent: Sunday, April 4, 2021 3:06 PM
To: Joel Duarte <jduarte@hlpusd.k12.ca.us>
Cc: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: Comments on Wedgeworth Project RDEIR

Sorry for the last minute comments. I am a procrastinator like many. And thank you for the opportunity to comment on the RDEIR.

1. Section 3.2 contains the project objectives. The first one is "Replace Wedgeworth Elementary School, built as a temporary facility and now in poor condition, ...". "Poor" is a subjective word. And the "poor condition" is not substantiated. As a matter of fact, the District maintained, in its Responses to Comments Cards, dated Nov 2019, that "All district facilities are inspected annually using the state approved Facilities Inspection Tool (FIT) and Los Angeles County Office of Education and meet requirements." (Item 40 on page 10) Consequently, it is more objective to say "Replace Wedgeworth, built as a temporary facility and always meeting regulatory requirements, .." RR7-1

2. I think the first objective should be related to the District's 2016 Master Facilities Plan, which proposed the construction of a permanent campus for Wedgeworth. Therefore, to give some legitimacy to this project, the first objective should be something like "Implement the 2016 MFP, which proposed ..." However, what this project intends to do is quite different from what the 2016 MFP proposed. Further, neither the 2016 MFP nor this project considered demographic factors such as projected student enrolment, which is required by Calif laws and regulations such as Education Code in preparing a MFP, if I am correct. Therefore, whether the project objective is tied to the 2016 MFP or not, this project lacks legitimacy. The need for this project has never been properly substantiated. The District should complete a updated MFP, taking into consideration how many students will enroll and where they come from, before deciding whether and how to proceed with this project, to implement the MFP. RR7-2

3. The table on Page 3-4 under Section 3.4 lists "[t]he anticipated approvals required for this project." Among actions the lead agency has to take, "Approve the proposed project." is put before "Certify the EIR." It may give people the wrong impression that the project approval should precede the EIR certification. Actually it should be the other way around. Regardless, wasn't this project already approved in the June 11, 2020 meeting of the Board of Education? So, the project approval is no longer an anticipated approval. Actually, I think it is extremely important that this RDEIR states that fact -- the project was already approved. And the RDEIR should refer to this project as "the approved project" not "the proposed project." This June 2020 approval meets the definition of "approval" in 14 CCR 15352: "(a) "Approval" means the decision by a public RR7-3 RR7-4

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agency which commits the agency to a definite course of actions .... (b) With private projects, approval occurs upon the earliest commitment to issue or the issuance by the public agency of a .. loan, or other form of financial assistance, .." The Board of Education resolved (Resolution 2020/21-9) on Sept 10, 2020 to issue a $55 million bond (certificate of participation) to pay for this Wedgeworth project. The Analysis section of Agenda Item 7.05.c states that the proceeds "will fund construction of permanent buildings of Wedgeworth" Also, per the Sept 10 meeting minutes, the Board approved the project and "authorized expenditures and bidding process." It is obvious that the bond would only be authorized after the project was approved. If expenditure authorization, bidding process launch, and the taking of a $55 million loan, which is now complete, still do not manifest that the June 2020 approval committed the district to a definite course of action, then nothing will. Any sane person would conclude that this project was "approved", as defined in 14 CCR 15352, on June 11, 2020. (Incidentally, 14 CCR 15090(a) requires the lead agency to certify a FEIR BEFORE approving a project. When the Board approved the Wedgeworth project, there was no FEIR. Therefore, the approval was probably illegal and any payment of interest on the bond as well as any other project expenditure might be misuse of public funds. Speaking of 14 CCR 15090(a), it says the lead agency shall certify that ... "The final EIR reflects the lead agency's independent judgement and analysis". My interpretation is that the Board members are responsible for the FEIR as if they personally write it collectively. So they need to be careful.)

RR7-4 Cont'd

4. On Page 5.8-30 under Section 5.8.4.1, the RDEIR states that "A VMT technical memo was prepared ... in accordance with the County's updated Transportation Guideline". L A County Public Works' Transportation Impact Analysis Guidelines, dated July 23, 2020, states that a TIA should be submitted to Public Works, which will review and approve it and issue a Confirmation of Findings Letter (page 5). The RDEIR does not mention any such approval or Letter. The RDEIR is to inform the Board and the public about the environmental impact of the project, therefore such approval and Letter, or lack thereof, should be disclosed (and included).

RR7-5

5. On the same page, the RDEIR states that "Therefore, the District, as the lead agency, determined that it would be reasonable to evaluate the school component...". The VMT Technical Memo, attached in Appendix E, prepared by Kittelson & Associates, states that "Therefore it is more appropriate to evaluate the school component ..." (page E-6) I do not know whether the District's independent judgement and analysis blindly depends on the consultant's expert opinion, or the consultant's expert opinion relies on the District's independent determination. And I do not know whether the Board, the District's decision-making body, agrees to this determination. Anyway, this opinion or determination is not well explained. The "school component" seems to refer to the

RR7-6

RR7-7

aggregate of Wedgeworth and Cedarlane. The preceding sentences talk about enrollment decline and the Wedgeworth K-5 students attending grades 6-8 on the same campus, instead of going to Cedarlane. And then "therefore" the school component should be evaluated in terms of "an overall net change in VMT associated with enrolment shifts." And then another "therefore" in the next sentence: "Therefore for this analysis, a potentially significant VMT impact would occur ..." I don't know whether the Board members themselves understand it. I don't. Now, it appears to me that this is the first time the District admits that Wedgeworth students will no longer go to Cedarlane if this project materializes. (The District stated, in Item 18 on page 8 of the Responses to Comments Cards dated Nov 2019, right before the original DEIR was published, "It is unclear as to what impact the changes to Wedgeworth [i.e., the expansion] will have on the overall enrollment of Cedarlane." Well, it should be clear now. And it should have been clear then.) The utilization of the Cedarlane campus would be significantly reduced. The first project objective on Page 3-1 should probably be "Replace Wedgeworth and part of Cedarlane with a new campus on the project site" in order to bring attention to this important fact. (And for the record, Cedarlane is not in "poor condition".) And alternatives to this project should also consider the impact on Cedarlane. There may be ripple effect. For example, the school boundaries may be redrawn, and some elementary schools north of Cedarlane may be sending (more) students to Cedarlane in order to better utilize the campus, or Cedarlane would be closed and Bixby upgraded to be a K-8, for example. The environmental impact should be evaluated for all these. If something is reasonably foreseeable (or actually in the plan), its impact should not be ignored in this RDEIR. This Wedgeworth project may well be just a part of a reorganization of the entire District's enrolment landscape, and the environmental impact should not be evaluated in terms of Wedgeworth alone.

RR7-8

RR7-9

RR7-10

RR7-11

6. The last part of the "Therefore, the District, ..." sentence reads: "not based on VMT per employee as the County's guidelines suggested." That is, the District decided not to follow the County's guidelines. I don't know whether Public Works eventually agreed to it. If Public Works has not made a decision, the District needs some strong reason(s) not to follow the guidelines. I am not convinced that the reason given, i.e., Wedgeworth students attending to Cedarlane, is convincing or at least well elaborated. And what if Public Works eventually decides that the District should follow the guidelines after all? It may be prudent to also evaluate the impact using the County guidelines and compare that to the method chosen by the District.

RR7-12

7. Also on page 5.8-30, the RDEIR claims that the "students within the Wedgeworth ES boundaries would likely attend Cedarlane
Academy after graduation." There are no data to support this claim, even though the data should be readily available. Maybe some but not all Wedgeworth students proceed

RR7-13

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to attend Cedarlane, because some would simply leave the District all together. One reason often heard to support this project is that many Wedgeworth students choose to leave the District instead of going to Cedarlane, therefore expanding Wedgeworth to K-8 would make them stay. Regardless, a more precise quantification is needed to support the RDEIR's claim. RR7-13 Cont'd

8. Again on the same page, the RDEIR states that "Currently [i.e. February 2021], approximately 16 per cent of the students attending Wedgeworth ES come from outside the District's attendance boundaries." I think a more accurate way of saying it is that 16% of the Wedgeworth students come from outside the Wedgeworth attendance boundary, i.e., are inter- and intra-District transfers, because that is what the District claimed on its Responses to Comments Cards back in Nov 2019 ("As of October 21, 2019, there are 594 students enrolled at Wedgeworth." "During the 18-19 School Year 100 students chose to attend Wedgeworth from outside the attendance boundary for the school. Intra-district Permit - 8. Inter-district Permit - 92."). However, according to District Superintendent Jimenez's presentation in the February 11, 2021 Board meeting, among 623 Wedgeworth students, 401 (65%) and 71 (11%) are intra- and inter-District transfers respectively. The District has some explaining to do: how come within a couple years the transfers has jumped from 16% to 76% and how this percentage is related to VMT and then the environmental impact. RR7-14

9. The last but one paragraph on Page 5.8-30 states that "Given that Cedarlane and Wedgeworth are in the same TAZ, ..." Figure 4 on page E-9 of Appendix E shows that Wedgeworth and Cedarlane are in different TAZs (traffic analysis zones), assumed that the blue lines in the figure demarcate the TAZs. RR7-15

10. That same paragraph makes three points: First, any changes in VMT would be related to student drop-off and pick-up. Second, 16% of Wedgeworth students are transfers. Third, "The District would continue to allow students from outside its boundaries to attend its schools, and the project would not have an influence on VMT associated with students attending from outside District boundaries." To simplify it a bit, it seems to say "As long as intra-District (and also inter-District?) transfers are allowed, the project would not impact VMT associated with these transfers." I don't see how these three points are connected. Maybe the last two sentences should be combined: "As long as transfers, currently at 16% at Wedgeworth, are allowed, the project has no effect on VMT associated with these transfers." But what has it to do with student drop-off and pick-up? How is the "no impact" conclusion derived? I simply don't understand. RR7-16 RR7-17

11. Section 7 discusses four alternatives to the proposed (or approved?) project. A missing alternative, which is clearly feasible and sufficiently different from the four, is RR7-18

New Replacement K-5 School and Four Baseball Fields Retention. I think it has the potential to be the "environmentally superior" alternative because it involves less school buildings and less students and no residential development. It is at least no worse than Alternative 4. Considering the "ripple effect" mentioned above in #5, this missing alternative has greater certainty in its environmental impact; that is, its impact is more determinable. Therefore, I think it should have been evaluated. RR7-18 Cont'd

12. Table 7-1 on Page 7-4 describes Alternative 3 as "all buildings would be one story high". It seems to contradict with what the first paragraph in Section 7.6 on Page 7-13 says: "two of the classroom buildings could be one story." Section 7.6.1 also states that "one of the buildings could be eliminated, or two of the two-story classroom buildings could be reduced to one story." RR7-19

That's all. Thank you very much.

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RR7 Response to Comments from Jack Hacienda, dated April 4, 2021.

RR7-1 The Wedgeworth Elementary School was built as a temporary facility in the 1960s and 1970s, so these temporary portables have been serving the students for over 50 years. Although the existing facilities meet the Los Angeles County Office of Education inspection requirements and do not put existing students in danger, the existing school facilities do not meet the current California Department of Education building standards. The school is in poor condition, and as a result the Board of Education adopted the project objective "Replace Wedgeworth Elementary School, built as a temporary facility and now in poor condition, with a modern, educationally appropriate campus for 1,200 K-8 students." The Board of Education has the responsibility and authority to establish the project's objectives.

RR7-2 The Board of Education has the authority and responsibility to establish project objectives. There is no requirement for the District to establish the project objectives to the 2016 Master Facilities Plan. The requirements of the Master Facilities Plan to consider demographic factors is not part of the proposed project, therefore, does not need to be considered as part of the proposed project. The EIR also does not need to substantiate a need for this project as part of its analysis.

RR7-3 Section 3.4 of the RDEIR does not indicate that the listed action items are in sequential order or that one action must be preceded by the prior action. The comment is correct in stating that the EIR must be certified before the approval of the project. Moreover, the EIR can be certified even if the project is denied. The EIR has listed anticipated approvals required for the project, and no further response is necessary.

RR7-4 The proposed project was not approved at the Board meeting held on June 11, 2020, September 10, 2020, or at any other time. Section 15352(a) of the California Code of Regulations (CCR), Title 14, indicates that "Approval" means the decision by a public agency which commits the agency to a definite course of action in regard to a project intended to be carried out by any person. The project intended to be carried out by the District has not been approved; therefore, there is no project for the District to take a definite course of action on. The District's resolution to issue a bond to fund the proposed project, if the project is approved, does not meet the definition of a "project" under the 14 CCR Section 15378, as the resolution itself would not result in a direct physical change in the environment or reasonably foreseeable indirect physical change in the environment.

Section 15378 of the CEQA Guidelines states that "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, *and* [emphasis added] that is any of the following:

(1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to

existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.

(2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.

(3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

Furthermore, the comment references Section 15352(b) that applies to "private project," not to a public project, such as this one. The proposed project is not a private project, and this section of the code does not apply to the District.

The commenter's statement that the Board of Education has already approved the project is inaccurate. The Board has not approved the project is further evidenced by the processing of this EIR.

RR7-5 The VMT technical memo included as Appendix E to the RDEIR has been prepared in accordance with the Los Angeles County Public Works' Transportation Impact Analysis Guidelines in terms of the methodology used. The comment references the County Guideline's overall steps for a project applicant in the County to follow for a discretionary development project or transportation project. The District is the lead agency for the proposed project, and it does not require a discretionary action from the County at this time. Therefore, the referenced step of review from the County Guidelines does not apply. However, the District is coordinating with the County Public Works for review of the traffic study and necessary driveway and various signage and painting improvements. The traffic impacts of the proposed project have been disclosed to the County of Los Angeles for review and comment, a Confirmation of Findings Letter has not been issued, and receipt of such a letter from the County is not required as part of the EIR evaluation.

Note that Los Angeles County Public Works reviewed the first circulated DEIR and provided a comment letter. The comment letter and response are included as Letter A4 in Section 2.1 of this FEIR. The RDEIR was also sent to the County Public Works for review but no comment was received.

RR7-6 Based on the traffic consultant's expert opinion as stated in the RDEIR Appendix E, *VMT Technical Memo*, the District staff determined that use of a VMT methodology that is different from the County's VMT Guidelines would be appropriate. The District is its own lead agency, and therefore is allowed to make such a determination. If the Board decides, after reviewing the FEIR (i.e., RDEIR and the response to comments), that it disagrees with the methodology, the Board may ask District staff to reevaluate the methodology and the finding.

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RR7-7 The school component refers to Phase 1 of the proposed project, which is the development of a K-8 school.

RR7-8 The editorial error in page E-6 of Appendix E has been modified. This modification would not change the analysis or conclusion of the RDEIR.

Page E-6, Appendix E, VMT Technical Memo. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

These students would no longer have to attend other schools such as nearby Cedarlane Academy located approximately 1 mile to the west after completing 5th grade. Therefore it is more appropriate to evaluate the school component of the project in terms of an overall net change in VMT associated with enrollment shifts. ~~Therefore f~~For this analysis, a potentially significant VMT impact would occur if the school component of the project would result in a net increase in existing total VMT. ~~For this analysis,~~ For the proposed project, VMT change would primarily result from the change in local students in grades 6 to 8 within District boundaries attending Wedgeworth compared to another school in the District.

RR7-9 The attendance boundary for the K-8 school has not been established; therefore, the actual impact on Cedarlane in terms of attendance is unknown. However, it was assumed that for the purposes of the VMT analysis that the students from Wedgeworth ES would attend Cedarlane after graduation, as Cedarlane Academy covers the current Wedgeworth ES boundaries. See Exhibit 1, below, for Wedgeworth ES and Cedarlane Academy attendance boundaries. For intra- and inter-district students, change in VMT would be negligible because some would need to drive longer and some shorter to attend different schools in or outside the District. The following text has been modified for clarification. This modification would not change the conclusion of the RDEIR analysis.

Page 5.8-30, Section 5.8.4.1, Impact Analysis, Impact 5.8-2. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

For the Phase 1 school expansion portion of the proposed project, a potentially significant VMT impact would occur if the expanded school would result in a net increase in existing total VMT. The proposed project is not proposing a new school; instead, the capacity of the existing school is being expanded to accommodate students in middle school grades, thereby allowing elementary students to continue their education in the same school through middle grades. For the purpose of the VMT analysis, it was assumed that ~~T~~these students within the Wedgeworth ES boundaries would likely attend Cedarlane Academy after graduation, about a mile to the west. The attendance boundary for the new K-8 school has not been established. Therefore, the District, as the leady agency, determined that it would be reasonable to evaluate the school component of the project in terms of an overall net change in VMT associated with enrollment shifts, and not based on VMT per employee as the County's guidelines suggested.

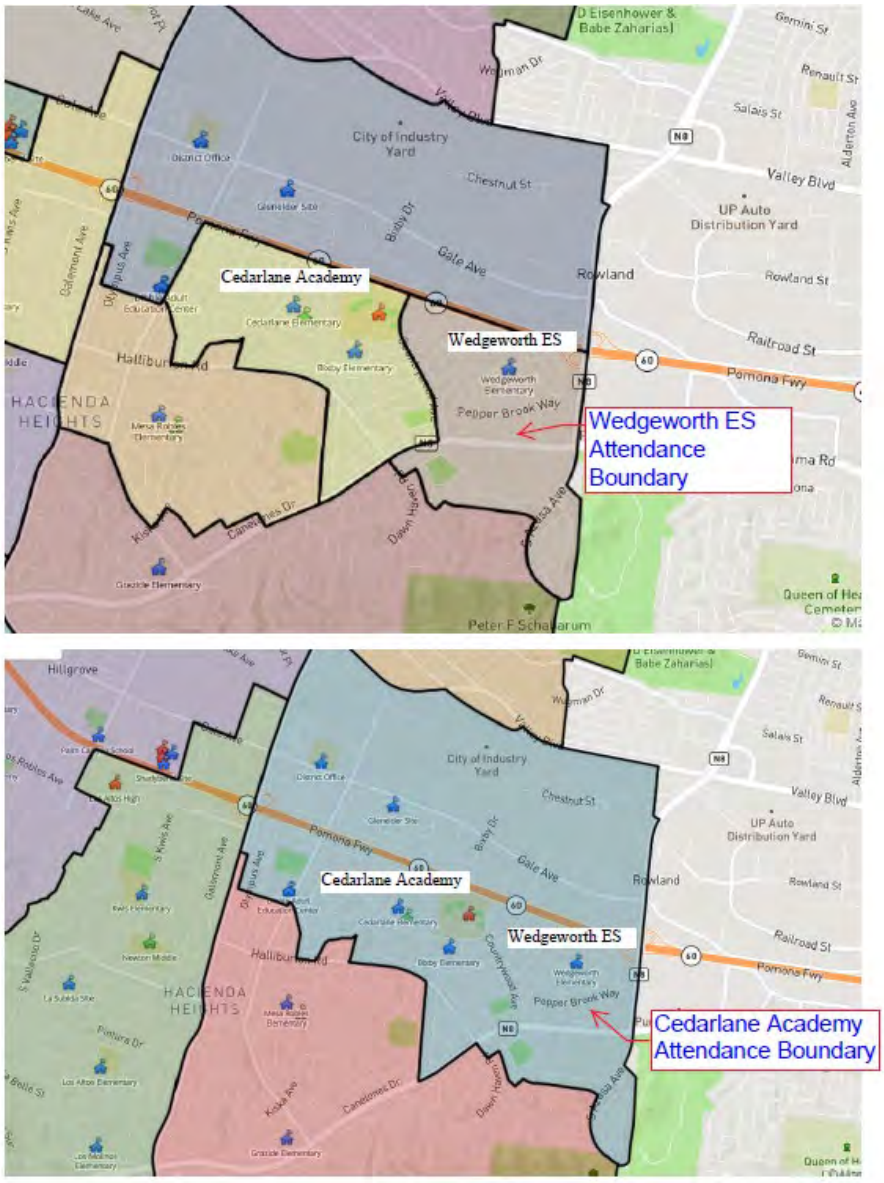


Exhibit 1: Wedgeworth ES and Cedarlane Academy Attendance Boundaries

RR7-10 Some reduction in enrollment at Cedarlane could occur if the attendance boundaries for the new K-8 school includes some of the area within the current Cedarlane Academy attendance boundary. The K-8 school is intended for the students going to Wedgeworth ES to continue to attend Wedgeworth through 8th grade. However, reduction in enrollment would not result in greater physical environmental impacts to Cedarlane Academy facilities, because physical environmental impacts generally occur from an increase in student capacity. Impacts from providing two unlit ballfields are discussed in

Section 5.7, Recreation, due to provision of two replacement fields. Revisions to the project objective on Page 3-1 would not be necessary because it is accurate and not misleading.

RR7-11 It is speculative to evaluate potential impacts from future redrawing of school boundaries, or some elementary school north of Cedarlane Academy sending students to Cedarlane to better utilize the campus, or closing Cedarlane Academy and redeveloping Bixby Elementary School to a K-8 school. These are not reasonably foreseeable indirect project impacts because the District currently has no plans to redraw school boundaries except for the new K-8 school, if it is approved; relocate students to Cedarlane Academy to better utilize the campus; or close Cedarlane Academy and redevelop Bixby. There is no substantial evidence to assert that the proposed project would impact the entire District's enrollment landscape, which would result in physical changes.

RR7-12 The District, as the lead agency, has discretion to choose the most appropriate methodology to evaluate a project VMT, as stated in 14 CCR Section 15064.3(b)(4):

> **14 CCR Section 15064.3(b)(4):** Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

Schools are local-serving land uses that do not necessarily increase VMT in a community. If students are not attending a school at Wedgeworth or Cedarlane, which are approximately one mile from each other, students will attend other schools in the area, also generating traffic. Some will drive longer and some shorter distances. If a household has students in different grades, the proposed project would allow two trips to be consolidated to one location instead of two, therefore reducing VMT. The County VMT Guidelines reviews schools as nonretail land uses such as an office, manufacturing, or institutional, and therefore uses a VMT-per-employee methodology. The District determined that this approach would not be representative of trips generating from student drop-offs and pick-ups. Evaluating VMT impact using County Guidelines for the school portion of the proposed project would result in an erroneous conclusion and is not necessary.

RR7-13 See Response RR7-9. Additionally, if students were to leave the District to attend other schools from Wedgeworth or Cedarlane attendance boundaries, VMT impact would be

greater because students would need to be driven farther distance instead of attending local schools.

RR7-14 Pursuant to the CEQA Guidelines Section 15125(a)(1), the baseline for the RDEIR analysis is at the time of the Notice of Preparation is published, which is July 2019. CEQA Guidelines Section 15125(a)(1) states: "Generally, the lead agency should describe physical environmental conditions as they exist **at the time the notice of preparation is published**, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective."

At the time of NOP release, 92 of the total 594 students, or approximately 16 percent, came from outside the District boundaries (inter-district), and 8 students, or about 1 percent, came from outside the Wedgeworth ES boundaries but within the District (intra-district). Therefore, the RDEIR accurately stated that approximately 16 percent of the students attending Wedgeworth ES come from outside the District's attendance boundaries currently.

The District allows intra- and inter-district transfers, and the number of intra- and inter-district transfers and the total enrollment numbers fluctuate annually. In 2021, the total inter-district transfers decreased to 71 from 92 in 2019, but the intra-district transfers increased substantially from 16 percent to 64 percent. The RDEIR used 0.60 mile to calculate the total VMT for the existing K-5 school based on the existing Wedgeworth ES attendance boundaries. Normally, if the total intra-district transfers increase, the total VMT would also increase. However, during this unprecedented time of pandemic, Wedgeworth ES campus was closed, and the students attended school from their homes through distance learning. Therefore, even with the high number of students that came from outside the Wedgeworth ES boundaries, the actual VMT decreased in 2020 and 2021. Therefore, it would not be appropriate to use the current transfer student numbers to analyze VMT.

RR7-15 There has been an editorial error and the sentence has been modified to state that Cedarlane and Wedgeworth are in the same "model" TAZ, indicating that they are in the same above-baseline model category, indicating that these areas all exceed the south County VMT per capita baseline of 12.7. The VMT Tech memo included in Appendix E of the RDEIR correctly states that both schools are in the same model TAZ, and this editorial error in the RDEIR would not change the outcome of the analysis nor result in new significant impact.

Page 5.8-30, Section 5.8.4.1, Impact Analysis, Impact 5.8-2. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known <u>underline</u>.

Given that Cedarlane and Wedgeworth are in the same <u>model</u> TAZ, the VMT per employee would not change, and any changes in VMT from the proposed project would be related to a change in trips related to student drop-off/pick-up.

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RR7-16 The sentence does not state that "any" change in VMT would be related to student drop-off and pick-up. It states that the VMT impact from the project would "primarily" be from student trips and explains why the VMT per employee methodology per the County guidelines was not used. This paragraph further explains the VMT methodology used for the project by indicating that although 16 percent of the students are from outside the District's attendance boundaries (inter-district transfers), these transfer students were not considered as having a substantial impact on VMT.

RR7-17 The RDEIR used 0.6 mile as the weighted average VMT for the existing Wedgeworth ES based on the existing attendance boundaries. If 16 percent of the total enrollment come from outside of District attendance boundary, the average VMT for these 16 percent would exceed 0.6 mile, but the actual miles were not calculated. Because the District allows inter- and intra-district transfers, the students can come from anywhere. Therefore, for the RDEIR analysis, it was assumed that a similar number of students would come from outside the District boundaries because the proposed project is intended to allow Wedgeworth ES students to continue on to middle school.

RR7-18 The comment proposes an alternative to build a replacement K-5 school and retain four baseball fields. Impacts from this alternative would be similar to Alternative 4, New Expanded K-8 School and Four Baseball Fields Retention (Including One Shared Field), except that two of the classroom buildings could be one story instead of two stories. As with the conclusion for Alternative 4, this alternative would lessen environmental impacts in all areas evaluated in the EIR (air quality, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, recreation, transportation, tribal cultural resources, and utilities and service systems). This alternative would lessen the recreation impact, and no replacement fields construction would be necessary as mitigation. This alternative would also eliminate the significant transportation impact related to VMT for the residential portion of the proposed project, and also eliminate the significant LOS traffic impact compared to the proposed project. As stated by the commenter, this alternative is environmentally superior to the proposed project. However, as with other alternatives considered in the RDEIR, it would only partially meet the project objectives. Consideration of this new alternative would not require recirculation of the RDEIR as it would not result in a new significant impact. This alternative would be considered by the Board of Education.

RR7-19 The assumption for Alternative 3 is that there would be a reduction in total building area due to the 50 percent reduction in student capacity; however, since there is no actual site plan for this alternative, there could be different design options. For clarification, sections of the RDEIR have been modified. However, it would not alter the analysis or conclusion of the RDEIR.

Page 7-4, Section 7.3, Alternatives Selected for Further Analysis, Table 7-1, Alternative 3: New Replacement K-5 School and Residential Development Alternative. The following

text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

Table 7-1 Summarized Description of the Alternatives

Alternatives	Description
Alternative 3: New Replacement K-5 School and Residential Development Alternative	▪ A 600-student capacity K-5 school would be constructed on the 10-acre portion of the project site. ▪ Reduction in total building area to accommodate 600 students instead of 1,200 students~~, and all buildings would be one story high~~. ▪ The remaining 10 acres would be developed with 160 residential units. ▪ All four baseball fields would be removed (one large and one small fields with lights and two small fields without lights).

Page 7-13, Section 7.6, Alternative 3: New Replacement K-5 School and Residential Development Alternative. The following text is modified. Deletions to the text are shown in ~~strikethrough~~ and additions are known underline.

With the maximum capacity of 600 students, it is assumed that one of the buildings could be eliminated, or two of the classroom buildings could be one story instead of two stories, since the number of classrooms could be reduced by approximately 50 percent.

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LETTER RR8 – Jolene Blanco (2 pages)

RR8

From: Jolene Blanco [redacted]
Sent: Monday, April 5, 2021 4:15 PM
To: Joel Duarte; Info HLPUSD; Alfonso Jimenez; Christine Salazar; Jeffrey DeLaTorre; Stephanie Serrano; Anthony Duarte; Joseph K. Chang
Subject: Wedgeworth (RDEIR) Response

April 5, 2021

Mr. Joel Duarte
HLPUSD Director of Purchasing and Warehouse

Re: Wedgeworth (RDEIR)

In response to the Wedgeworth K-8 and Residential Development Project Redistributed Draft Environmental Impact Report (RDEIR), I submit the following comments and questions. Also, In January, 2020, comments and questions were submitted in response to the (DEIR). I emailed Mr. Hansburger on January 15, with my questions and comments. I want to clarify that my email to Mr. Hansburger was mistakenly dated (January, 15, 2019 The date should have read January 15, 2020).

Taken directly from Section 5 (RDEIR) (including typo) Environmental Analysis Transportation
Impact 5.8.2:

"For the Phase 1 school expansion portion of the proposed project, a potentially significant VMT impact would occur if the expanded school would result in a net increase in existing total VMT. **The proposed project is not proposing a new school;** instead, the capacity of the existing school is being expanded to accommodate students in middle school grades, thereby allowing elementary students to continue their education in the same school through middle grades. These students within the Wedgeworth ES boundaries would likely attend Cedarlane Academy after graduation, about a mile to the west. Therefore, the District, as the leady agency, determined that it would be reasonable to evaluate the school component of the project in terms of an overall net change in VMT associated with enrollment shifts, and not based on VMT per employee as the County's guidelines suggested." RR8-1

Question: How can the (RDEIR) state the "proposed project is not proposing a new school?"
Comment: Not proposing a new school, but existing school is being expanded …. this sounds very vague and purposefully misleading.

Taken directly from Section 9 (RDEIR) (Including typos)

"REC-2 would result in development and operation of replacement ballfield on the underutilized playfields at two existing schools." RR8-2

Comment: The same solution could work for students … transfer them to underutilized existing schools.

Question: Why were the flyers for the Public Meetings entitled Wedgeworth K-8 School Project Environmental Impact Report (EIR) and the flyer made no mention of the Residential Development Project? RR8-3

Question: Has the County Board of Supervisors approved the Residential Development Project? RR8-4
Question: Where may I find that information?

The title of this project: Wedgeworth K-8 School and Residential Development Project would indicate that this is a joint (DEIR) for two projects (Phase 1 and Phase 2). While there was considerable reference to Phase 2 in the (DEIR), there has been very little in the way of specifics to adequately inform or answer questions. For example, a recurring statement throughout the (DEIR) seems to be: "no specific plans for residential development are available." If you are reporting on the Residential Development, you need to provide specific plans and mitigation measures. RR8-5
Question: Why are the specific plans for residential development unavailable?

If this is the (RDEIR) for Phase 2, it absolutely should include specifics regarding said project! **Will Phase 2 of the proposed project require its own (DEIR) separate from this (DEIR)? Or are you planning to piggy back the Phase 2 DEIR with the Phase 1 DEIR and call it complete?** Phase 2 has many unanswered questions. RR8-6

Table 5.1-9 Lists the Phase 2 Construction activities, duration days, and equipment to be used in proposed residential construction. RR8-7

1

3. Response to Comments from the Recirculated DEIR

Question: How do you know how many days will be needed for construction if you haven't yet determined the number of residential units that will be proposed? RR8-7 Cont'd

5. Environmental Analysis states, "The residential component of the project would result in 160 units and would generate an increase in 464 people." RR8-8
Question: How was this figure determined? Averaging 2.9 residents per unit seems unrealistic.

Alternatives to Wedgeworth Project: RR8-9
Build a new K-5 school, keep the baseball fields as they are, and eliminate the housing construction.
Question: Why is this alternative not a consideration?

5.1-4 AQ-3
This report indicates that water trucks will spray the construction site three times a day. RR8-10
Question: How do you know three times a day will be adequate?
Question: Shouldn't the construction site be watered a minimum of three times a day or, as much as is required by an independent environmental monitor to control fugitive dust? Some days may require additional watering, i.e., windy days.

Question: What is the plan for cleaning construction vehicles from construction contamination before traveling through the neighborhood?

HYDROLOGY AND WATER QUALITY
5.5.4.1
"The County will not permit an increase in runoff to the County storm drainage system, nor direct connection to the system." RR8-11

The report states stormwater will be stored in an underground water retention basin. The water will then eventually pass through perforated steel pipes back into the ground.
Question: Ultimately what does this do to the stability of the soil?

5.8 Transportation:

The study area intersections are purported to be representative of other intersections within the study area that were not analyzed. This study is not taking into account the current residential traffic from the feeder streets such as Ridgepark, Orchard Hill Lane, Countrypark Lane, Gay Park Lane, Lark Tree Way, not to mention the two dozen additional feeder streets. RR8-12
Question: How can you extrapolate data from one intersection to another?

There is no allowance in this study for the traffic numbers during the holiday period, typically October thru December when Colima Rd. and Azusa Ave. become extremely impacted. It takes time to study or examine traffic patterns carefully. Vehicle counts over a period of one day is more akin to a survey. RR8-13
Question: How can vehicle counts from just one day, May 14, 2019, be an accurate basis from which to develop and publish a traffic study?

It should be noted that within the past 20 or so years, due to all of the residential and commercial development in Hacienda Heights, Rowland Heights and the City of Industry, Pepperbrook Way has become an alternate route for people traveling Colima Rd. during a.m. and p.m. commutes. RR8-14
Question: How did your study consider this fact?

The SCAQMD does not require health risk assessments to be conducted for short-term emissions from construction equipment. RR8-15
Question: What about the long-term effects of emissions from idling vehicles in impacted traffic areas?

Water:
Plan to "store" runoff water on the construction site .. RR8-16
Question: How will you prevent non-storm water from discharging to the ground, offsite, or entering storm drains or watercourses?
Comment: Best Management Practices would suggest a system to remove the runoff water from the construction site.

Question: Will the District prepare a "statement of overriding considerations" before it approves the project? RR8-17
I would ask that you please acknowledge receipt of this email. I thank you all for your time, effort and hard work on this important matter.

Sincerely,
Jolene Blanco
Hacienda Heights Resident

2

RR8 Response to Comments from Jolene Blanco, dated April 5, 2021.

RR8-1 The project site is already developed and operating as Wedgeworth ES. Therefore, the District is not developing a new school but expanding the existing Wedgeworth ES to accommodate students in grades 6 through 8. The RDEIR is not vague in describing the project, nor is it misleading.

RR8-2 Using underutilized athletic fields is not the same as reallocating students to different schools. Transferring students is not part of the project objectives of the proposed project.

RR8-3 The comment does not address the content or adequacy of the RDEIR.

RR8-4 The County Board of Supervisors have not approved the residential development project. The residential portion of the proposed project would require a separate discretionary approval by the County when a specific development plan is proposed. No such plan is available at this time.

RR8-5 Specifics cannot be provided because there is no plan for the project. The lead agency for the residential development portion of the project would be the County of Los Angeles, and specific development plan will be required to be reviewed and approved by the County Board of Supervisors. Specific plans for residential development are not available because the District is not a developer, and the site has not been sold to a developer for future development.

RR8-6 While the District prepared the EIR, which addresses the potential residential development, it does not have approval authority over Phase 2. The County of Los Angeles is responsible for determining the appropriate CEQA document for the approval of the residential portion of the project (Phase 2). As the responsible agency it may use the current EIR or it may determine that additional analysis is needed and may prepare an addendum, a supplement to the current EIR or prepare a subsequent EIR.

RR8-7 The comment references Table 5.1-9 in the first DEIR circulated for public review in December 2019, and it is not part of the RDEIR. However, the same comment was submitted on the DEIR and the response is included in Section 2.2, *Individual Response to Comments (Comments on DEIR)*. See Response to Comment R1-5.

RR8-8 See Response to Comment R1-6 in Section 2.2, *Individual Response to Comment*s, of this document. And see Response RR7-13 above.

RR8-9 See Response to Comment R1-7 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-10 See Response to Comment R1-8 in Section 2.2, *Individual Response to Comments*, of this document.

3. Response to Comments from the Recirculated DEIR

RR8-11 See Response to Comment R1-9 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-12 See Response to Comment R1-10 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-13 See Response to Comment R1-11 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-14 See Response to Comment R1-12 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-15 See Response to Comment R1-14 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-16 See Response to Comment R1-16 in Section 2.2, *Individual Response to Comments*, of this document.

RR8-17 See Response to Comment R1-19 in Section 2.2, *Individual Response to Comments*, of this document.

LETTER RR9 – Lupita Jimenez (1 page)

RR9

From: LUPITA JIMENEZ [redacted]
Sent: Monday, April 5, 2021 4:52 PM
To: Joel Duarte
Subject: Wedgeworth Project

Hello Good Afternoon
I'm writing to say Please don't build the Wedgeworth School. Just like you guys relocated the Temple Academy Students in the La Puente side you guys can do the same for the Wedgeworth Students. All that money that's going to be wasted in the Wedgeworth Project it can be used & distributed among all 32 schools in the District. And make this schools all 21st century while adding Dual Immersion also in the La Puente side. Also you can bring Hoke Economics back to the Middle & High School level. And other great electives. Like Child Care & Gaming Production. I just hope my voice is heard. I'm a Parent of a HLPUSD and a Product of the School District and a Parent Volunteer. RR9-1

Sent from my iPhone

1

3. Response to Comments from the Recirculated DEIR

RR9 Response to Comments from Lupita Jimenez, dated April 5, 2021.

RR9-1 The commenter is against the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR10 – Ming Lai (6 pages)

RR10

Dear Mr Duarte:

I am "resubmitting" my Jan 2020 comments to respond to the latest RDEIR. Though some of my comments referred to Section 8, which was re-done in the RDEIR, I think they are still relevant because I showed the actual traffic situation there and did not specifically challenge the LOS methodology, which is now (partly?) replaced by the VMT methodology. RR10-1
Thank you.

Ming Lai

From: M Lai [redacted]
Sent: Friday, January 17, 2020 1:37 PM
To: mhansberger@hlpusd.k12.ca.us <mhansberger@hlpusd.k12.ca.us>
Subject: Comments on Wedgeworth Project draft env impact report

Please find attached the PDF of my letter. I am going to submit a signed hardcopy to the District office in person this afternoon. Photos are sent in separate email messages. Thank you.

(Mr) Ming Lai

3. Response to Comments from the Recirculated DEIR

17102 Ridge Park Dr
Hacienda Heights CA 91745-3848
January 17, 2020

Hacienda La Puente Unified School District
Mark Hansberger, Director, Facilities Projects
15959 E Gale Ave
City of Industry CA 91716-0002
Hand Delivered

Dear Mr Hansberger:

This letter is to comment on the traffic impact and the project objectives/alternatives of the Wedgeworth K-8 School and Residential Development Project proposed by the Hacienda La Puente Unified School District (HLPUSD) in response to the draft environment impact report (DEIR), dated December 2019, as published on HLPUSD's web site.

Transportation

Whereas many residents already complained about the current traffic situation surrounding the school, in the public meetings organized by HLPUSD, for example, I would like to focus on one single intersection, at Pepper Brook Way and Wedgeworth Dr, which is close to the Azusa Ave x Pepper Brook Way intersection and my home. (DEIR Sec 6.2 concluded that the project would have a "significant unavoidable adverse [traffic] impact" on the Azusa Ave and Pepper Brook Way intersection, and that "the proposed project could conflict with a program, plan, ordinance or policy addressing the circulation system, ..." as a result.) The Pepper Brook x Wedgeworth intersection is a 4-way intersection, not controlled by any traffic signal; its east-west cross street is Pepper Brook, its north side is the east end of Wedgeworth Dr, and its south side is an entrance/exit to/from the Hacienda Center outdoor shopping mall, which is anchored by 99 Ranch Market and 14 restaurants, among others. The traffic at this intersection is not studied in the DEIR. There are two entrances/exits to/from the mall from/to Pepper Brook; one is right next to Bank of America in the mall, closer to Azusa Ave, another is next to 99 Ranch Market, a bit west from the BoA entrance/exit (see attached maps). And I am mainly talking about the latter one, which directly leads to Wedgeworth Dr. If one needs to get to Freeway 60 from the mall, these exits are the way to go. If one wants to get to east bound Colima Rd, one is also likely to use them to make a right turn into south bound Azusa Ave first, because there is usually a long line, that is hard to cut into, in the left turn lanes on Azusa into Colima. As said in DEIR Sec 5.8.1, the Azusa x Pepper Brook intersection currently is already graded D ("fair", "generally results in noticeable congestion"); therefore, thanks to the traffic overflow therefrom, the Pepper Brook x Wedgeworth intersection is often congested. I am not a traffic engineer; I am not able to produce those volume-to-capacity (V/C), level of service (LOS) numbers, for example. I can only attach some photos I took to visually illustrate the situation. I do not know whether these real-life scenarios are consistent or inconsistent with the numbers in the DEIR, but I hope these photos are more illustrative than cold numbers and convince HLPUSD that traffic at the Pepper Brook x Wedgeworth intersection is pretty undesirable at present. With the new school and the increased enrollment, plus the new apartments, one can imagine that the

situation would worsen significantly. Traffic congestion is no just a congestion issue; it is a safety issue as well: When people are impatient, they tend to do something unsafe. A couple weeks ago I saw someone exited Hacienda Center using the entrance lane, going directly into Wedgeworth Dr, apparently because he/she had had enough waiting in the exit lane, which was backed up because the traffic on the eastbound lane on Pepper Brook was backed up. In my opinion, the Pepper Brook x Wedgeworth intersection is busier and more dangerous than, say, the Colima x Halliburton intersection. But both Pepper Brook Way and Wedgeworth Dr are classified by the Calif Highway System Map, as said in DEIR Sec 5.8.1.3, as "local streets", and Colima Rd and Halliburton Rd are "other principal arterial" and "minor arterial" respectively. Pepper Brook was not designed to handle so much traffic and should not be like this. With the expanded school and the apartments, the situation will definitely be even worse.

One may argue that my evidence was not collected scientifically. But I live in the neighborhood and drive around here day in and day out. On the other hand, the traffic numbers in the DEIR was collected in one single day – May 14, 2019, as said in DEIR Sec 5.8.1.4. One day's data may not be representative; the sample size is too small. In addition, the DEIR seems to study only the so-called peak hour traffic – 7 to 9 am and 4 to 6 pm on weekdays, per Sec 5.8.1.2. That might give the wrong impression that traffic is at its peak only during those 4 hours. Actually, traffic on eastbound Pepper Brook appears to be pretty congested since around 2pm. Assume that the apartments are built and new residents move in, the traffic impact would not be limited to weekdays. People go out on weekends to dine and shop. There are this Hacienda Center on the west side of Azusa Ave at Pepper Brook, and Puente Hills Mall on the east side. I do not understand why weekend traffic was not studied in the DEIR. Impacts on the environment do not care whether it is a weekday or a weekend.

The Pepper Brook x Wedgeworth intersection is the only entrance/exit from/to Azusa Ave (and Fwy 60) for residents living at Shady Meadow Dr, Elklane Dr, Cedarmont Dr, Ridge Park Dr, and part of Wedgeworth Dr, unless they drive backward and make a circle around. Frankly I cannot think of any effective way to mitigate the traffic backup there, because it is too close to the Azusa x Pepper Brook intersection. (Some proposed staggering start and end times for schools in that area in order to distribute the traffic; however, Wilson High, Cedarlane, Bixbly Elementary, and Wedgeworth Elementary are all located within half a mile or so on Wedgeworth Dr, and each school already staggers its class times; so I don't see how there can still be room for improvement.) It is foreseeable that the parents as well as the residents in the new apartments would heavily use Pepper Brook Way and further overload it.

DEIR Sec. 5.8.1.1 lists seven goals (M1 through M7) included in the L A County Mobility Element in the General Plan 2035. According to DEIR Sec. 5.8.1.1, "Goal M4 includes policy M4.7, which presents minimum LOS standards, as follows: Maintain a minimum LOS D, where feasible; however, allow LOS below D on a case by case basis in order to further other General Plan goals and policies ... The Mobility Element was prepared in compliance with the Complete Streets Act of 2008 (Assembly Bill 1358), which requires local jurisdictions to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, ..." My understanding therefore is that it is a legal requirement that a local jurisdiction, presumably such as HLPUSD, needs to plan for a transportation network that meets the needs of all users, taking into consideration M4.7, among other things. As

3. Response to Comments from the Recirculated DEIR

mentioned above, the Azusa x Pepper Brook intersection currently is already graded D, per DEIR Sec 5.8.1, and it is expected to be worse after the project, per DEIR Tables 5.8.7 through 5.8.10. I don't see how a more congested intersection would meet the needs of road users; I don't see in the DEIR how HLPUSD is planning for it (as said in DEIR, the intersection is under the jurisdiction of L A County and Industry, HLPUSD cannot do anything about it). I also don't see in the DEIR how HLPUSD would justify the adverse impact on this intersection by arguing that the project would further other General Plan goals.

Project objectives/alternatives

DEIR Sec 3.2 lists four objectives of this project, in some 70 words:

1. Replace Wedgeworth Elementary School, built as a temporary facility and now in poor condition, with a modern, educationally appropriate campus for 1,200 K-8 students.
2. Avoid the need to move students off-site during construction by maintaining the existing campus until the new campus opens.
3. Demolish the existing campus.
4. Create value by seeking rezoning of the remaining property to R-3 (Limited Multiple Residence), which would provide a maximum of 160 dwelling units.

There is no elaboration and support for these objectives at all. I don't know how these objectives are formulated. It is hard to believe that the goals of a project, whose construction cost is said to be around $52 million, are only "explained" in four sentences. The explanation of these objectives is totally inadequate. The project alternatives in DEIR Sec 7 are developed and evaluated based on these objectives. If the objectives are not well formulated, the project alternatives cannot be properly developed and evaluated. The objectives stated seem to be arbitrary. Per DEIR Sec 3.2, the objectives "will aid decision makers in their reviews of the project and associated environment impacts." If the objectives are poorly drawn up, then the decision makers will not be well guided in their review.

Objective 1 is to replace Wedgeworth with an "educationally appropriate campus for 1,200 K-8 students." How/where is "educationally appropriate" defined? If a standard for educational appropriateness exists, I do not see in the DEIR how the proposed project specifically meets this standard. How is the current temporary facility not "educationally appropriate"? There are other HLPUSD schools still using temporary facility; are they not "educationally appropriate"? Does that mean the past and current Wedgeworth students are not educated appropriately? I do understand that the Calif Dept of Education approved a K-8 school housing 1000 pupils (not 1200) back in 1963; but that was more than 50 years ago! It approved it but did not require it. Calif Dept of Education also approved Glenelder and La Subida schools, but HLPUSD even closed them, didn't it? The DEIR does not explain why Wedgeworth needs to expand from K-5 toK-8, that is, why this expansion should be an objective. Why is the objective not keeping the school at K-5 or even shrinking it to K-3, say for example? Correct me if I am wrong, student enrolment in HLPUSD was down by 8% in the past 2 or 3 years, and HLPUSD forecast that the enrolment will keep decreasing, but on the other hand, HLPUSD forecast that Wedgeworth enrolment would go up, therefore justifying the replacement and expansion of Wedgeworth. I have not seen any explanation from HLPUSD as to this seemingly strange thing. There

has been no major residential development in the neighborhood; so where does the student increase come from? What makes mothers in this neighborhood more "reproductive" than others in the District? If HLPUSD does not know why, then this 1,200 forecast is unreliable. I simply don't see any support for the 1,200 number. Simply put, there is no "needs analysis" to support the 1,200 K-8 capacity. Why do we *need* a K-8 school for 1,200? Why should we achieve this objective?

Objective 3 is to demolish the existing campus. I don't see how this can become an objective, unless the existing facility poses safety threat to students and teachers. If that is the case, then the objective should be something like "provide a safe environment, in compliance with Building Code and Education Code." If you need to raze an old house in order to build a new one, the goal is to build a new house, not to demolish the old house. Demolish the existing campus, like demolishing the baseball fields, is a means to a goal (or goals), not a goal itself. And I think the existing campus is safe, isn't it? If it is not, then HLPUSD needs to show some evidence to prove it.

Objective 4 is to create (monetary?) value by seeking rezoning of the remaining property to R-3, which would provide a maximum of 160 dwelling units. Well, merely seeking rezoning does not create money. Only the actual sale of the land would make money. It makes little sense to me that simply filing an application to request rezoning would create value of some kind. Why R-3, not R-1, say? Would selling R-1 land more profitable than selling R-3 land? Would R-1 development be less environmentally impactful? And how much value (i.e. money) is HLPUSD talking about? Would HLPUSD incur any cost? How much is the possibility of successfully realizing this value? What is the risk? Is it possible that this objective – making money by selling the land – would not be achieved even if the proposed project is implemented, simply because the rezoning request is denied, for instance? If there are other factors involved, one cannot say a definite Yes to Achieving Objective 4 with respect to Proposed Project and Alternative 4 in DEIR Table 7-1.

It is worth mentioning that many have suggested, as an alternative to the proposed project, in the past that at least part of the Wedgeworth student population be moved to Bixby and Cedarland. This suggestion is not included as an alternative in DEIR Sec 7. Actually, HLPUSD addressed this in the FAQ on its web site https://www.hlpschools.org/wedgeworth-faq :

9. Why don't we move Wedgeworth students to Bixby and Cedarlane?
Every community has educational needs and Wedgeworth Elementary provides the needs for the Wedgeworth Community. Bixby and Cedarlane provide the instructional needs for the communities they serve. As noted in the response to question #7, neither of those schools have the existing capacity to accommodate the enrollment at Wedgeworth.

I find the answer unacceptable. When Glenelder and La Subida were closed, their students were transferred to other schools. Would HLPUSD then say that those other schools served only their own communities and therefore were not able to accommodate those dislocated students? For the sake of argument, if HLPUSD decides to close Wedgeworth for whatever reason, and its students need to move to some place else, would HLPUSD say "Every community has educational needs ... Bixby and Cedarlane provide the instructional needs [only] for the communities they serve"? That kind of argument only

3. Response to Comments from the Recirculated DEIR

shows that HLPUSD is not able to allocate existing resources flexibly and wisely. There is one HLPUSD district; there is not a Wedgeworth District, a Bixby District or a Cedarlane District. And the answer only says that neither Bixby nor Cedarlane has "existing capacity" to accommodate "the enrollment" at Wedgeworth. I don't know what precisely "existing capacity" means. Is it possible that there is available land but not enough classroom buildings? Then is it possible to build some buildings to accommodate the Wedgeworth students? Is the (individual or combined?) capacity not enough for the 600 current students at Wedgeworth or the forecast 1200? Can Bixby take in 300 and Cedarlane take in 300, for example? I surely think that this alternative should be included and discussed in DEIR.

Thank you.

Sincerely,

(Mr) Ming Lai

Attachments: 32 4"x6" photos (if HLPUSD make these photos public, please consider hiding the license plates)

RR10 Response to Comments from Ming Lai, no date.

RR10-1 The commenter is resubmitting the comment letter submitted for the first DEIR dated January 2020. No comments pertaining to the RDEIR were submitted. See Responses to Letters R16 and R17 in Section 2 of this document.

3. Response to Comments from the Recirculated DEIR

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LETTER RR11 – Shelley Sun (1 page)

RR11

From: shelley sun <[redacted]
Date: 4/3/21 6:20 PM (GMT-08:00)
To: Joel Duarte <jduarte@hlpusd.k12.ca.us>
Subject: Wedgeworth elementary school project

Hi Mr. Duarte,

My name is Shelley Sun, I live 5 mins walking distance from that school (I have lived in hacienda heights for 27 year years, I graduated from Glen A. Wilson High School and as well as my older daughter). I am against the district and the board on proceeding to build this project! I am concern with noises, traffic, pollution, and the unequal distribution of resource only for one school. RR11-1

Sincerely,
Shelley Sun

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3. Response to Comments from the Recirculated DEIR

RR11 Response to Comments from Shelley Sun, dated April 3, 2021.

RR11-1 The commenter is against the project and is concerned with noise, traffic, pollution, and the unequal distribution of resources for only one school. The first DEIR—circulated from December 5, 2019, to January 21, 2020—addressed impacts related to noise and air pollution, and impacts were found to be less than significant. The traffic impact was evaluated again in the RDEIR and it was determined that both level of service (LOS) impact and vehicle miles traveled impact would be significant and unavoidable. Note that pursuant to SB 743, LOS impact is no longer considered significant environmental impact. However, in order to fully disclose project impact to the public, the District determined LOS impact as significant. A Statement of Overriding Consideration will be prepared and adopted as part of the project approval once the FEIR is certified. A SOC will need to find that the benefits of a project outweigh the unavoidable adverse environmental effects. The EIR evaluates physical environmental impacts of a project, and the comment does not substantiate how the unequal distribution of resources for only one school would result in adverse physical environmental impacts. No further response is necessary.

LETTER RR12 – Brian Voon (1 page)

RR12

From: Brian EC Voon [redacted]
Sent: Friday, April 2, 2021 9:12 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR report / support Wedgeworth K8

Dear Mr. Duarte,

Thank you for your services to the district. Glad to have you!

In response to K8 project, I am fully supporting K8 project, and oppose K5 Option 1 and Option 2.

Judging from the unit cost like $/student, K8 option is the most cost-effective, with just a tad increase in overall cost. Increasing student capacity will definitely pull in more financial resources for the benefit of the whole district. Let's do the right thing by going with K8! RR12-1

Appreciate you and looking forward!

Regards,
Brian Voon
Parent

3. Response to Comments from the Recirculated DEIR

RR12 Response to Comments from Brian Voon, dated April 2, 2021.

RR12-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR13 – Connie Liu (1 page)

RR13

From: CC LL [redacted]
Sent: Saturday, April 3, 2021 10:06 AM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR report / support Wedgeworth K8

Dear Mr. Duarte,

I am writing to support K8 projects! Object ALL K5 and K5 Option 2 plans!

The original K8 plan from EIR report is fantastic!!!

According to the Construction Budget Comparison report, obviously K5 and K5 (2) projects cost the least efficient. With 760 pupils (420 less then K8 enrollments), the funding could be 420 x $9000 = $3.8 million, same as the difference between K8 and K5(2)! RR13-1

Which means, if we choose K8, the total funding for 1180 pupils will cover the difference in 18 months!!!

Think about, with K8 projects we could enroll 1180 students, that is a huge funding we could bring back to the districts and this will benefit the whole districts forever!

Please make K8 happens, not just a dream for our little ones!

Thank you for your time and looking forward to hearing from you soon.

Best regards,

Connie Liu
5th grade Parent

3. Response to Comments from the Recirculated DEIR

RR13 Response to Comments from Connie Liu, dated April 3, 2021.

RR13-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR14 – Eve H (1 page)

RR14

From: Eve H [redacted]
Sent: Monday, April 5, 2021 4:56 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR report

To whom it may concern,

After reviewing the report, we support WW elementary to rebuild. It will be so beneficial for our community to have flagship K-8 school.. this school will bring economic changes to our school so that the entire district will benefit.. RR14-1

It is very short sighted for those who opposed this project when everyone will benefit (the HLP entire student body).

Please rebuild k-8 for the community

Thank you

EVE H

3. Response to Comments from the Recirculated DEIR

RR14 Response to Comments from Eve H, dated April 5, 2021.

RR14-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR15 – Grace Zhai (1 page)

RR15

Dear Mr. Duarte,

I have read the evaluation report carefully and I very much agree with K8, Because K8 can accommodate 1180 students. However, K5 and K5(2) can only enroll 760 students, In this way, 420 students are undercharged each year, and the school district receives 4 million less each year. In addition, K5 and K5(2) only save 5~8 million in construction cost compared to K8, but if K8 is built, 5~8 million can be recovered in only 2 years, Therefore, building K8 is a once-and-for-all solution! Not only solve the problem of student admission, but also bring the greatest benefit to the school district.

Thank you for your time and have a nice weekend!

RR15-1

Best regards,
Grace Zhai
2nd & 3rd Parent

2021. 4. 3.

3. Response to Comments from the Recirculated DEIR

RR15 Response to Comments from Grace Zhai, dated April 3, 2021.

RR15-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR16 – Hazel Ng (1 page)

RR16

From: Hazel <[redacted]
Date: 4/3/21 1:52 PM (GMT-08:00)
To: Info HLPUSD <info@hlpusd.k12.ca.us>, Joel Duarte <jduarte@hlpusd.k12.ca.us>
Subject: EIR report comment

HI Mr. Duarte,

After reviewing the EIR report, and the K8 and K5 plans, here are the comment from our Family:

1. We support K8 school only. We believe that continue education in the same school from elementary to middle school is the best for students, both for their social-emotional well-being and their academic development.

2. We support the approval of the EIR report on the original K8 Plan

3. K8 school can host 1180 students and is a lot more cost-effective than K5 school.

RR16-1

4. OBJECT to all K5 option plans, we especially do not understand why baseball field becomes part of the school district plan and responsibility.

RR16-2

Please kindly let me know if you have receipt this email.

Have a great weekend.

Thanks and regards,
Hazel Ng
(parent)

3. Response to Comments from the Recirculated DEIR

RR16 Response to Comments from Hazel Ng**, dated April 3, 2021.**

RR16-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

RR16-2 The existing baseball fields are part of the existing baseline conditions that must be evaluated and properly mitigated.

LETTER RR17 – Ian Suen (1 page)

RR17-1

From: Ian Suen [redacted]
Sent: Monday, April 5, 2021 4:56 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>; Wedgeworth School Project <wspquestions@hlpusd.k12.ca.us>
Subject: EIR report/support Wedgeworth K8

Hello Mr. Joel Duarte

As a parent, I support K8 only. Because it can enroll 1180 students! K5 & K5(2) projects are NOT cost efficient! RR17-1

Thank you

3. Response to Comments from the Recirculated DEIR

RR17 Response to Comments from Ian Suen**, dated April 5, 2021.**

RR17-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR18 – Jenny Liang (1 page)

RR18

From: JENNY LIANG [redacted]
Sent: Friday, April 2, 2021 5:44 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR Report/ Support Wedgeworth K8

Dear Mr. Duart,

After reading the Construction Budget Comparison Report, I support Wedgeworth K8 project. It is more beneficial and cost- effective plan than the other two.

K 8 plan can enroll 1,180 students with the cost 55 million dollars, while K 5 or K 5 (2) can only enroll 760 students with 47 or 50 million dollars, which means 5-8 million cost can enroll 420 more students. 420 is almost the student number of an ordinary school. RR18-1

Therefore, I think K8 project is a terrific plan for our school district. Please support the K8 project and make it into action.

Thank you for your time and appreciate your support.

Best regards,

Jenny Liang

3. Response to Comments from the Recirculated DEIR

RR18 Response to Comments from Jenny Liang, dated April 2, 2021.

RR18-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR19 – Jessie Yu (1 page)

RR19

From: Baba Mama <babamama4kids@gmail.com>
Sent: Saturday, April 3, 2021 12:03 AM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR report / support Wedgeworth K8

After reviewed the EIR report, I want to let you know that

1. Support K8 only. Because it can enroll 1180 students — RR19-1

2. K5 and K5(2) projects are not cost efficient.

Sincerely,

Jessie Yu

3. Response to Comments from the Recirculated DEIR

RR19 Response to Comments from Jessie Yu, dated April 3, 2021.

RR19-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR20 – Joann Li (1 page)

RR20

From: Joann [redacted]
Sent: Friday, April 2, 2021 9:08 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR report / support Wedgeworth K8

Dear Mr. Duarte,

I am writing to support K8 projects! Object ALL K5 and K5 Option 2 plans!

The original K8 plan from EIR report is fantastic!!!

According to the Construction Budget Comparison report, obviously K5 and K5 (2) projects cost the least efficient. With 760 pupils (420 less then K8 enrollments), the funding could be 420 x $9000 = $3.8 million, same as the difference between K8 and K5(2)!

Which means, if we choose K8, the total funding for 1180 pupils will cover the difference in 18 months!!! RR20-1

Think about, with K8 projects we could enroll 1180 students, that is a huge funding we could bring back to the districts and this will benefit the whole districts forever!

Please make K8 happens, not just a dream for our little ones!

Thank you for your time and looking forward to hearing from you soon.

Best regards,

Joann Li
Kindergarten Parent

Please confirm receipt of this email

從我的iPhone傳送

3. Response to Comments from the Recirculated DEIR

RR20 Response to Comments from Joann Li, dated April 2, 2021.

RR20-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR21 – Jojo Chuk (1 page)

RR21

From: Jojo Chuk [redacted]
Sent: Friday, April 2, 2021 4:21 PM
To: Wedgeworth School Project
Cc: Info HLPUSD
Subject: Support Wedgeworth K8 project

Mr Duarte, HLPUSD superintendent and school board members,

I live in La Puente for over 10 years. Few years ago, We transferred our kid back to HLPUSD from Walnut because i heard the school is going to be a K8. I am very disappointed to hear that the school board may change direction to K5. I just want to express that if there is more delays for whatever reason. My friends who are also La Puente residents (total 5 kids at age 4 who planned to apply kindergarten next year at Wedgeworth) including my own will definitely looking to apply / transfer back to the charter school in West Covina or other schools in Walnut due to the delay and how indecisive of HLPUSD is demonstrating. RR21-1

Please stay with K8 plan and do the right thing for Wedgeworth students. They deserve a permanent school building and safe environment to learn and to thrive.

Thanks

Jojo Chuk

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3. Response to Comments from the Recirculated DEIR

RR21 Response to Comments from Jojo Chuk**, dated April 2, 2021.**

RR21-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR22 – Justin Mui (1 page)

RR22

From: Justin Mui [redacted]
Sent: Thursday, April 1, 2021 3:04 PM
To: Wedgeworth School Project
Subject: timeline for construction for wedgeworth

Hi,

I wanted to know when the estimated time of construction starts for the Wedgeworth K-8. Also, how long is the duration to completion after construction starts? RR22-1

I also really hope that the construction does begin. The students, principal, teacher, and staff of Wedgeworth deserve a new school!

Justin

1

3. Response to Comments from the Recirculated DEIR

RR22 Response to Comments from Justin Mui, dated April 1, 2021.

RR22-1 The project was initially scheduled to start construction in July 2021 and end in December 2022, a total construction duration of approximately 17 months. However, the construction schedule could be delayed based on the timing of the project approval.

LETTER RR23 – Lily Chan (1 page)

RR23

From: Lily Chan [redacted]
Sent: Friday, April 2, 2021 9:19 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: Re: EIR report / support Wedgeworth K8

Following up, please confirm receipt of this email. Thank you!

On Fri, Apr 2, 2021 at 9:17 PM Lily Chan <lilychan68@gmail.com> wrote:
Dear Mr. Duarte,

First of all, thank you for your services to the district!

Referring to this EIR report, I am fully supporting K8 project, and oppose K5 Option 1 and Option 2.

Construction of a new school should only happen once and I believe the K8 option would be the most efficient cost-wise, and in terms of staging it. Imagine trying to save a few dollars and having to upgrade the building for more capacity in the future, what a challenge that would be to keep the student while expanding the building. In the long run, if we choose K5 options, it would cost more in the long run. Therefore, we should do it right the first time by building the K8 option! RR23-1

Appreciate you and looking forward!

Regards,
Lily Chan
Parent

3. Response to Comments from the Recirculated DEIR

RR23 Response to Comments from Lily Chan, dated April 2, 2021.

RR23-1 The commenter supports the project. The RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

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LETTER RR24 – Melody Hsieh (1 page)

RR24

From: Melody Hsieh [redacted]
Sent: Monday, March 1, 2021 8:56 AM
To: Wedgeworth School Project
Subject: Supporting WW K to 8

Our kids really need to have new building school K to 8 to study. 50 years of portable class is enough. Building this school is good for community and bring more new family to community. RR24-1

Melody

1

3. Response to Comments from the Recirculated DEIR

RR24 Response to Comments from Melody Hsieh**, dated March 1, 2021.**

RR24-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR25 – Ning Shu (1 page)

RR25

From: Ning Shu [redacted]
Sent: Friday, April 2, 2021 2:56 PM
To: Info HLPUSD; Wedgeworth School Project
Subject: EIR report / support Wedgeworth K8

To whom it may concern,

I am a parent of Wedgeworth Elementary School. I have 3 kids in this school. My biggest will be going to 4th grade next school year. I am so worried about her middle school. I do need her to stay in Wedgeworth, I don't have to drive to another place since I have 3 kids in the same school. Also I am checking other school districts. If the school won't be K-8. I will move my kids to another school district. Please understand as a parent I want to give my kids the best. RR25-1

Right now the school environment is sooooo terrible. I can't believe our school district is accepting our kids to study in this environment.

As the parent who lives in this school district. I only want K-8 school. I will choose none of the objects for K5.

Thank you!

Best regards,
Ning Shu

1

3. Response to Comments from the Recirculated DEIR

RR25 Response to Comments from Ning Shu, dated April 2, 2021.

RR25-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR26 – Vivian Kuo (2 pages)

RR26

From: Vivian Kuo [redacted]
Sent: Monday, April 5, 2021 12:12 AM
To: Info HLPUSD <info@hlpusd.k12.ca.us>; Joel Duarte <jduarte@hlpusd.k12.ca.us>; Wedgeworth School Project <wspquestions@hlpusd.k12.ca.us>
Subject: Comments on RDEIR

Dear Mr. Duarte:

I am glad to see that the EIR shows there are minimal impacts on the original Wedgeworth K-8 project design. I am also glad that the proposed baseball fields at Kwis and Cederlane also have minimal environmental impact.

Considering the cost of the project and the projected revenue, it makes sense to do original K-8. It is not cost efficient to do either of the K-5 options. It also makes more sense to relocate the baseball fields to Kwis and Cedarlane. The current Highlander fields are very dated and have not been maintained to standard. Keeping the baseball fields there will cost Little League more money to repair the field. If the fields are relocated, there will be 1.5 million fund from LA County Supervisor Janice Hahn's office to help furbish the fields at Kwis and Cedarlane. RR26-1

This would also benefit the students at Cedarlane since the Principal has indicated that the current fields are not in good shape and not safe for students to play. If the district refurbishes those fields at Cedarlane, the students can benefit from it by using it for PE or extracurricular activities.

Therefore I approve this RDEIR and fully support the original K-8 design with relocating baseball field to Kwis and Cedarlane.

1

3. Response to Comments from the Recirculated DEIR

Regards,
Vivian Kuo
626-922-6605

2

RR26 Response to Comments from Vivian Kuo, dated April 5, 2021.

RR26-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. The EIR evaluates physical environmental impacts of the project, not the cost effectiveness of the project. No response is necessary. Comments are noted and will be provided to the Board of Education.

3. Response to Comments from the Recirculated DEIR

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LETTER RR27 – Vivian Wu (2 pages)

RR27

From: Vivian Wu [redacted]
Sent: Friday, April 2, 2021 7:27 PM
To: Wedgeworth School Project <wspquestions@hlpusd.k12.ca.us>; Info HLPUSD <info@hlpusd.k12.ca.us>
Subject: EIR comments //Wedgeworth K8 Project

Hi Joel and all,

After reviewing essential part from EIR report (Page 185-212), I have no doubt stand firm On
Original Wedgeworth K8 project and the EIR reflecting K8 project.

Please see comparison between
K8v.s.K5(1) 1story and
K8 v.s. K5(2)+baseball

	Comparison		Comparison	
	Original K8 plan	K5 1 story	Original K8 plan	K5(2) with baseball
Total cost to build	55 Million	48 Million	55 Million	50 Million
Project cost difference	7 Million		5 Million	
Students Enrollment	1180	760	1180	760
Students Difference yearly	420		420	
Per student funding est.$9000	$ 10,620,000	$ 6,840,000	$ 10,620,000	$ 6,840,000
Funding Difference yearly	$ 3,780,000.00		$ 3,780,000.00	
Funding Difference 2nd year	Project $7 Million different cost set off	$7,560,000	Project $5 Million different cost set off	$ 7,560,000.00
Funding Difference 3rd year	surplus	$ 11,340,000.00	surplus	$ 11,340,000.00

RR27-1

Conclusion :
1) K8 compare to K5(1), with difference 7 Million in project cost and yearly 3.78 funding difference,
the difference of 7 Million can be set off in less than 2 years.

3. Response to Comments from the Recirculated DEIR

which means the 7 Million construction cost you save can be earned back with K8 1180 enrollment

2) K8 compare to K5(2), with difference of 5 Million construction cost and yearly 3.78 funding difference, the difference of 5 Million can be set off in less than 1.5 years.

Clearly K5(2) is not cost effective and cost efficient unless Baseball can generate enough profit to cover the difference, would HHLL baseball like to to generate enough profit to help cover the loss on the 420 enrollment funding per head every year ?
FYI it is 3.78Million/yr.

Both K5(1) and K5(2) are similar for the same reason. It is all about the Money.
What makes the money is the plan to go with.

Vivian Wu
Hacienda Heights Resident
a hard copy will be mailed to HLPUSD
Please confirm your receipt of this email

RR27-1
Cont'd

RR27 Response to Comments from Vivian Wu, dated April 2, 2021.

RR27-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

3. Response to Comments from the Recirculated DEIR

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LETTER RR28 – Yeekicho (1 page)

RR28

From: [redacted]
Sent: Monday, April 5, 2021 4:47 PM
To: Info HLPUSD; Wedgeworth School Project
Subject: Supporting K8 project for Wedgeworth

Dear Mr Duarte

I'm here to write you to support the K8 project for wedgeworth elementary school.

My little brother studied there when he was a kinder -5th grade. He is now a 28 year old boy. I have been knowing the school will be rebuild and expand since 20+ years ago. I was so heartbreaking whenever the project was told to be postponed / canceled. Please please pleaSe have the project to be continued, it will definitely help the kids for a better education. RR28-1

Thank you very much for the time. Please please please give our kids a better environment to learn and grow.

Hope to heard from you soon with a good news.

Best regards
Yeekicho
One of the mom of wedgeworth

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3. Response to Comments from the Recirculated DEIR

RR28 Response to Comments from Yeekicho, dated April 5, 2021.

RR28-1 The commenter supports the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR29 – Zona Don (1 page)

RR29

From: 林育如 [redacted]
Sent: Monday, April 5, 2021 5:00 PM
To: Info HLPUSD <info@hlpusd.k12.ca.us>; YuJu Lin <christinlin110@gmail.com>
Cc: Wedgeworth School Project <wspquestions@hlpusd.k12.ca.us>
Subject: EIR report / support Wedgeworth K8

Dear Mr.Joel Duarte

After reviewing the EIR report and the K8 and K8 plan, here are comment from our family

1. Please Support K8 only. Because it can enroll 1180 students
The more students bring more funds to the school district. HHLPU School District is a population losing District. We need more students

RR29-1

2. K5 and K5(2) projects are not cost efficient.

Please support Wedgeworth K8

Best Regards

ZONA DON
Wedgeworth parents

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3. Response to Comments from the Recirculated DEIR

RR29 Response to Comments from Zona Don, dated April 5, 2021.

RR29-1 The commenter supports the project. The commenter states that the proposed project would have an enrollment capacity of 1,180 students, but the maximum capacity of the proposed K-8 school is 1,200. And the RDEIR evaluates physical environmental impacts of the project, not financial aspects of the project. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

LETTER RR30 – Henty Roman (1 page)

RR30

March 31, 2021

Dear Mr. Joel Duarte

I have lived in Hacienda Heights 66 years and reside on 17027 Wedgeworth Dr. for last 22 years. My house is about 200 yards away from Wedgeworth Elementary School. The school consist of bungalows as a temporary solution when surrounding permanent schools were overcrowded.

Wedgeworth continue to stay operating because students from other areas other than Hacienda Heights have been allowed to enroll. Consequently, the school does not have adequate parking and the traffic flow has become a problem for us as homeowners located by the school. Not to mention the poor condition of the existing buildings

RR30-1

As you may know Dibble Elementary School was vacant for years until it opened again for Adult classes. Unfortunately, the Board of Education continued to vote leaving Wedgeworth open. Now we have a school that is need costly repairs and building upgrades.

I like many homeowners that live by Wedgeworth do not support expanding the school to accommodate a new K-8 school. However, I do support replacing the existing buildings due to their condition and age with additional parking and leaving the existing baseball fields where they are currently located.

RR30-2

Therefore, I am requesting the Board of Education reconsider not expanding Wedgeworth Elementary School to accommodate a new K-8 school site.

Sincerely

Henry Roman

3. Response to Comments from the Recirculated DEIR

RR30 Response to Comments from Henry Roman, dated March 31, 2021.

RR30-1 The commenter lives about 200 yards from the project site and asserts that Wedgeworth ES continue to operate because students from other areas other than Hacienda Heights have been allowed to enroll and that this resulted in inadequate parking and problematic traffic flow. This claim is not accurate as the inter-district transfer at the school at the time of Notice of Preparation issuance in 2019 was 92 students, and intra-district transfers were 8 students out of total 594 enrolled. The school does not have adequate parking because it was developed as a temporary facility, not because students from other areas attend this school.

RR30-2 The commenter opposes expanding the school to accommodate a new K-8 school but supports replacing the existing buildings, providing additional parking, and retaining all four baseball fields. The comment provides an opinion and does not address any physical environmental impact or adequacy of the DEIR. No response is necessary. Comments are noted and will be provided to the Board of Education.

4. Revisions to the Draft EIR

4.1 INTRODUCTION

This section contains revisions to the DEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the DEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the DEIR. Changes made to the DEIR are identified here in ~~strikeout text~~ to indicate deletions and in <u>underlined text</u> to signify additions.

4.2 DEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the DEIR. Deletions to the text are shown in ~~strikethrough~~ and additions are known <u>underline</u>.

Page 1-9, Section 1.8, *Summary of Environmental Impacts*. The following text is modified in response to Comment A7-4 from the South Coast Air Quality Management District.

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures		Level of Significance After Mitigation
Impact 5.1-2: Construction activities associated with the proposed project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Potentially Significant	AQ-1	The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall, at minimum, use equipment that meets the EPA's Tier 3 emissions standards for off-road diesel-powered construction equipment with more than 50 horsepower for all building demolition, unless it can be demonstrated to District that such equipment is not available. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by Tier 3 emissions standards for a similarly sized engine, as defined by the California Air Resources Board's regulations. Prior to construction, the project engineer shall ensure that all building demolition plans clearly show the requirement for EPA Tier 3 emissions standards for construction equipment over 50 horsepower for the specific activities stated above. During construction, the construction contractor shall maintain a list of all operating equipment associated with building demolition in use on the site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and	Less Than Significant

4. Revisions to the Draft EIR

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures		Level of Significance After Mitigation
			maintained in accordance with the manufacturer's recommendations.	
		AQ-2	The ~~Hacienda La Puente Unified School District (District) shall specify in the~~ construction bid that the construction contractor(s) shall only use zero VOC (volatile organic compound) content (i.e., 0 to 5 grams per liter) interior paints and ~~with a~~ low VOC (volatile organic compound) content with a maximum concentration of 30 grams per liter (g/L) exterior paints for residential building architectural coating to reduce VOC emissions. All building and site plans shall note use of zero VOC content paints ~~with a low VOC content with a maximum concentration of 30 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the requirement for use on interior paint with a low VOC content with a maximum concentration of 30 g/L for the specified buildings, herein~~. This requirement shall be noted on all construction management plans.	

Page 1-10, Section 1.8, *Summary of Environmental Impacts*. The following text is modified in response to Comment A7-12 from the South Coast Air Quality Management District and R1-8 from Jolene Blanco.

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures		Level of Significance After Mitigation
Impact 5.1-4: Construction activities associated with the proposed project could expose sensitive receptors to substantial pollutant concentrations.	Potentially Significant	AQ-3	The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas a minimum of three times per day during Phase 1 site preparation activities to minimize fugitive dust and require additional watering as necessary if there is any evidence of "wind driven fugitive dust" as defined in South Coast Air Quality Management District Rule 403(c)(36) (i.e., "visible emissions from any disturbed surface area which is generated by wind action alone"). In addition, the District shall also specify in the construction bid contract that the construction contractor(s) shall post visible signage that contains the most current South Coast AQMD complaint hotline telephone number in addition to the contact information for a District representative to report any complaints related to project construction activities. These signs shall be placed on the outer side of the construction areas or in such areas that are plainly visible to the public. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.	Less Than Significant

Page 1-15, Section 1.8, *Summary of Environmental Impacts*. The following text is modified to correct an editorial error.

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.9-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).	Potentially Significant	T~~R~~CR-1 Prior to the issuance of any permits allowing ground-disturbing activities that cause excavation to depths greater than artificial fill, the Hacienda La Puente Unified School District and the Applicant for the residential development shall retain qualified Native American Monitor(s), approved by tribal group who is traditionally and culturally affiliates with the project site and has demonstrated, by a written material, that there is a reason to suggest that there could be a tribal cultural resource (T~~R~~CR) within the project site, during construction-related ground disturbance activities. The monitor(s) shall be present on-site during construction that involve ground disturbing activities. The Native American monitor(s) shall be responsible for the following activities during the monitoring, as appropriate:	Less Than Significant

Page 2-5 DEIR Section 2.2, Notice of Preparation and Initial Study, Table 2-1, Government Agency NOP Written Comments Summary, has been modified in response to Comment A4-1.

Table 2-1 Government Agency NOP Written Comments Summary

Commenting Agency/Person	Letter Dated	Summary of Comments	Response/Issue Addressed In:
Los Angeles County Public Health	8/27/2019	Comments that the California Solid Waste Reuse and Recycling Access Act of 1991 requires each development project to provide an adequate storage area for collection and removal of recyclable materials.	The proposed K-8 School provides a site plan showing the trash enclosure, and this area would also provide as storage area for collection and removal of recyclable materials. The residential development would also be required comply with the California Solid Waste Reuse and Recycling Act and provide appropriate storage area for collection and removal of recyclable materials.

4. Revisions to the Draft EIR

Page 5.1-30, Impact 5.1-5. The following text is modified to correct an erroneous reference to construction activities.

A project could expose sensitive receptors to elevated pollutant concentrations during ~~construction~~ operational activities if it would cause or contribute significantly to elevated levels. The following describes changes in localized impacts from long-term operational activities of the proposed project.

Page 5.1-33, Section 5.1.7, *Mitigation Measures*. The following mitigation measure is revised to be applicable to the County of Los Angeles, which would be the lead agency for development of the proposed residential. Additionally, this mitigation measure is revised in response to Comment A7-4.

AQ-2 The ~~Hacienda La Puente Unified School District (District) shall specify in the construction bid that the~~ construction contractor(s) shall only use zero VOC (volatile organic compound) content (i.e., 0 to 5 grams per liter) interior paints and ~~with a~~ low VOC (volatile organic compound) content with a maximum concentration of 30 grams per liter (g/L) exterior paints for residential building architectural coating to reduce VOC emissions. All building and site plans shall note use of zero VOC content paints ~~with a maximum VOC concentration of 30 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show this requirement.~~ This requirement shall be noted on all construction management plans.

Page 5.1-33, Section 5.1.7, *Mitigation Measures*. The following mitigation measure is revised in response to Comment A7-12 and R1-8.

AQ-3 The Hacienda La Puente Unified School District (District) shall specify in the construction bid that the construction contractor(s) shall water exposed ground surfaces and disturbed areas a minimum of three times per day during Phase 1 site preparation and grading activities to minimize fugitive dust and require additional watering as necessary if there is any evidence of "wind driven fugitive dust" as defined in South Coast Air Quality Management District Rule 403(c)(36) (i.e., "visible emissions from any disturbed surface area which is generated by wind action alone"). In addition, the District shall also specify in the construction bid contract that the construction contractor(s) shall post visible signage that contains the most current South Coast AQMD complaint hotline telephone number in addition to the contact information for a District representative to report any complaints related to project construction activities. These signs shall be placed on the outer side of the construction areas or in such areas that are plainly visible to the public. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the District's Director of Facilities and Maintenance, or designee, clearly show the watering requirement to control fugitive dust.

Pages 5.1-33 to 5.1-35, Section 5.1.8, *Level of Significance After Mitigation*. The following text and table are updated to reflect the change in Mitigation Measure AQ-2 requiring zero VOC-content paint instead of low VOC-content paint. This mitigation measure is revised in response to Comment A7-4.

Impact 5.1-2

Implementation of Mitigation Measure AQ-1, which requires use of site preparation and grading equipment that meets the EPA's Tier 3 emissions standards for school construction activities and Mitigation Measure AQ-2, which requires use of ~~lower~~ zero VOC-content paints for the proposed residences, would limit construction-related emissions. As shown in Table 5.1-14, *Maximum Daily Construction Emissions with Mitigation*, with the implementation of Mitigation Measures AQ-1 and AQ-2, construction-related NOx and VOC emissions would be reduced to below the SCAQMD screening-level LST. Project and cumulative construction-related air quality impacts under Impact 5.1-2 would be reduced to less than significant.

Table 5.1-14 Maximum Daily Construction Emissions with Mitigation

Construction Activity	Maximum Daily Emissions (lbs/Day)[1]					
	VOC[2]	NO_x	CO	SO_2	PM_{10}[3]	$PM_{2.5}$[3]
Phase 1 – Year 2020						
Site Preparation	2	27	23	<1	8	5
Site Preparation and Grading	5	72	62	<1	14	8
Site Preparation, Grading, and Utility Trenching	5	78	69	<1	14	8
Site Preparation and Utility Trenching	3	34	30	<1	9	5
Site Preparation, Utility Trenching, and Building Construction	5	57	52	<1	11	7
Utility Trenching and Building Construction	3	30	29	<1	3	2
Building Construction	3	23	22	<1	2	1
Phase 1 – Year 2021						
Building Construction	2	21	22	<1	2	1
Building Construction, Paving, and Architectural Coating	16	36	39	<1	3	2
Building Construction, Paving, Architectural Coating, Demolition, Portables Removal, and Finishing and Landscaping	19	69	69	<1	6	4
Building Construction, Paving, Architectural Coating, Demolition, and Finishing and Landscaping	18	63	67	<1	5	3
Building Construction, Paving, Architectural Coating, and Finishing and Landscaping	16	39	43	<1	4	2
Paving, Architectural Coating, and Finishing and Landscaping	14	18	22	<1	1	1
Architectural Coating and Finishing/Landscaping	12	5	6	<1	1	<1
Phase 2 – Year 2024						

4. Revisions to the Draft EIR

Table 5.1-14 Maximum Daily Construction Emissions with Mitigation

Construction Activity	Maximum Daily Emissions (lbs/Day)[1]					
	VOC[2]	NO_x	CO	SO_2	PM_{10}[3]	$PM_{2.5}$[3]
Demolition	2	22	21	<1	2	1
Demolition and Bleachers Removal	3	26	23	<1	2	1
Site Preparation	3	27	19	<1	9	5
Grading	2	22	17	<1	4	2
Utility Trenching	1	5	6	<1	<1	<1
Building Construction	2	18	25	<1	3	1
Phase 2 – Year 2025						
Building Construction	2	17	24	<1	3	1
Architectural Coating	~~60~~33	1	3	<1	1	<1
Paving	1	9	15	<1	1	<1
Finishing and Landscape	<1	2	4	<1	<1	<1
Maximum Daily Emissions	~~60~~33	78	70	<1	14	8
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold	No	No	No	No	No	No

Source: CalEEMod, version 2016.3.2. Highest winter or summer emissions are reported.
Notes: lbs = pounds.
[1] Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the SCAQMD.
[2] A VOC content of ~~30~~5 g/L was used in modeling for Mitigation Measure AQ-2 to provide the most conservative emissions.
[3] Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, watering disturbed areas a minimum of three times per day under Mitigation Measure AQ-2, use of Tier 3 construction equipment under Mitigation Measure AQ-1, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

Page 5.5-6, Section 5.5.1.2, *Existing Conditions*. The following text is modified in response to Comment A5-1, from the Sanitation Districts of Los Angeles County.

There is storm drainage along Eagle Park Road and along the east boundary that conveys collected stormwater to the Lower San Gabriel Valley Reach 4~~,~~ then to ~~San Jose Creek Water Reclamation Plant along~~ San Gabriel River ~~to the north~~.

Page 5.6-22, Section 5.6.6, *Level of Significance Before Mitigation*. The following text is modified to correct an editorial error.

The following impact would be less than significant: 5.6-2~~,~~ and 5.6-3~~, and 5.6-4~~.

Page 5.6-24, Section 5.6.8, *Level of Significance After Mitigation*. The following text is modified to correct an editorial error.

Impact 5.~~13~~6-1

Page 5.9-6, Section 5.9.6, *Level of Significance Before Mitigation*. The following text is modified to correct an editorial error.

Without mitigation, the following impacts would be **potentially significant:**

- **Impact 5.~~14~~9-2** Tribal cultural resources could be adversely impacted by grading activities associated with the proposed project.

Page 5.9-6, Section 5.9.7, *Mitigation Measures*. The following text is modified to correct an editorial error.

T~~R~~CR-1 Prior to the issuance of any permits allowing ground-disturbing activities that cause excavation to depths greater than artificial fill, the Hacienda La Puente Unified School District and the Applicant for the residential development shall retain qualified Native American Monitor(s), approved by tribal group who is traditionally and culturally affiliates with the project site and has demonstrated, by a written material, that there is a reason to suggest that there could be a tribal cultural resource (T~~R~~CR) within the project site, during construction-related ground disturbance activities. The monitor(s) shall be present on-site during construction that involve ground disturbing activities. The Native American monitor(s) shall be responsible for the following activities during the monitoring, as appropriate:

Page 5.10-6, Section 5.10.4, *Environmental Impacts*, Impact 5.10-2. The following text is modified in response to Comment A5-2 from the Sanitation Districts of Los Angeles County.

There is existing 10-inch sewer line in Wedgeworth Drive to the south, which is connected to an 18-inch main in the sewer easement along the north property line before being conveyed to the Sanitation Districts of Los Angeles County's Joint Outfall H Unit 7C Trunk Sewer in a private right-of-way along the north side of the San Jose Creek.

4. Revisions to the Draft EIR

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5. Revisions to the Recirculated Draft EIR

5.1 INTRODUCTION

This section contains revisions to the RDEIR based upon (1) additional or revised information required to prepare a response to a specific comment; (2) applicable updated information that was not available at the time of DEIR publication; and/or (3) typographical errors. This section also includes additional mitigation measures to fully respond to commenter concerns as well as provide additional clarification to mitigation requirements included in the RDEIR. The provision of these additional mitigation measures does not alter any impact significance conclusions as disclosed in the RDEIR. Changes made to the RDEIR are identified here in ~~strikeout text~~ to indicate deletions and in <u>underlined text</u> to signify additions.

5.2 RDEIR REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the RDEIR. Deletions to the text are shown in ~~strikethrough~~ and additions are known <u>underline</u>.

Page 1-7, Section 1.5.2, Alternative 2: New Expanded K-8 School and Two New Baseball Fields Retention Alternative. The following text is modified to correct an editorial error.

Under this alternative, two eastern small baseball fields would be retained, and no residential units would be developed. This alternative is intended to reduce ~~the significant and unavoidable~~ recreation impacts.

Page 1-7, Section 1.5.4, Alternative 4: New Expanded K-8 School and Four Baseball Fields Retention Alternative. The following text is modified to correct an editorial error.

The project site would be developed as a K-8 school with 1,200 students as with the proposed project, but the athletic fields and hardcourts design would be modified to maintain the existing four baseball fields. This alternative is intended to reduce ~~the significant and unavoidable~~ recreation impacts.

Page 5.7-1, Section 5.7.1.2, Existing Conditions, Project Site, has been modified in response to comments from the Gabriela Navar (Comment RR3).

The project site is developed with the existing Wedgeworth Elementary School, four baseball fields used by Hacienda ~~Heights~~<u>Highlander</u> Little League, and a vacant lot. Wedgeworth ES has hardcourts, a kindergarten playground, and turf playfields. The baseball fields and supporting facilities include small bleachers, two batting cages, dugouts, press boxes, storage containers, and parking, and two of the four baseball fields are equipped with nighttime lighting.

5. Revisions to the Recirculated Draft EIR

~~Hacienda Heights Little League originally played at Salto Field in the 1970s. However, when that District property was turned over to the County, baseball could no longer be played there. In April 1978, Hacienda Heights Little League was allowed access to the vacant field owned by the District until a new permanent school is constructed there, which is the current project site. Wedgeworth ES was constructed in the early 1970s as a temporary facility for instruction until a permanent school could be built. However, by the mid-1970s, student enrollment declined, and the decision to build a permanent facility was postponed. Since 1978 the District-owned fields have been used by Hacienda Heights Little League at no charge, with the initial understanding that field access would only be allowed until the District decides to build a permanent school facility. The project site is not zoned for public or recreational facilities, and the County's Parks and Recreation Department does not list these baseball fields as part of the County facilities.~~

Page 5.7-4, Section 5.7.4.1, Impact Analysis, Impact 5.7-1, 1st paragraph, has been modified in response to Comment letter AA1 from the County of Los Angeles Parks and Recreation.

Therefore, compliance with Los Angeles County Code Sections 21.24.340 and 21.28.140 ~~additional park facilities would be provided by~~ would ensure that the residential portion of the proposed project ~~that would~~ adds value to the county recreation system without substantially impacting the existing recreation facilities.

Page 5.7-4, Section 5.7.4.1, Impact Analysis, Impact 5.7-2, 1st paragraph, has been modified in response to Comment letter AA1 from the County of Los Angeles Parks and Recreation.

Pursuant to the Los Angeles County Code Sections 21.24.340 and 21.28.140, new recreational facilities may be provided on-site or elsewhere through the payment of in lieu fees, or the fees can be used to improve the existing parks in Park Planning 9 (Hacienda Heights).

Page 5.7-6, Section 5.7.5, Cumulative Impacts, Impact of New Recreation Facilities, 2nd paragraph, has been modified in response to Comment letter AA1 from the County of Los Angeles Parks and Recreation.

Although ~~the District~~ development of the K-8 school is not required to comply with the Los Angeles County Code Sections 21.24.340 and 21.28.140 to provide additional facilities, the additional use may overtax existing fields, requiring development of additional facilities. The proposed project may result in a significant cumulative impact individually and cumulatively.

Page 5.8-30, Section 5.8.4.1, Impact Analysis, Impact 5.8-2, has been modified in response to Comment letter RR7 from Jack Hacienda.

For the Phase 1 school expansion portion of the proposed project, a potentially significant VMT impact would occur if the expanded school would result in a net increase in existing total VMT. The proposed project is not proposing a new school; instead, the capacity of the existing school is being expanded to accommodate students in middle school grades, thereby allowing elementary students to continue their education in the same school through middle grades. For the purpose of the VMT analysis, it was assumed that ~~T~~these students within the Wedgeworth ES boundaries would likely attend Cedarlane Academy after graduation, about a mile to the west.

The attendance boundary for the new K-8 school has not been established. Therefore, the District, as the lead~~y~~ agency, determined that it would be reasonable to evaluate the school component of the project in terms of an overall net change in VMT associated with enrollment shifts, and not based on VMT per employee as the County's guidelines suggested.

Page 5.8-30, Section 5.8.4.1, Impact Analysis, Impact 5.8-2, has been modified in response to Comment letter RR7 from Jack Hacienda.

Given that Cedarlane and Wedgeworth are in the same model TAZ, the VMT per employee would not change, and any changes in VMT from the proposed project would be related to a change in trips related to student drop-off/pick-up.

Page 7-4, Section 7.3, Alternatives Selected for Further Analysis, Table 7-1, Alternative 3: New Replacement K-5 School and Residential Development Alternative. The following text is modified in response to Comment letter RR7 from Jack Hacienda.

Table 7-1 Summarized Description of the Alternatives

Alternatives	Description
Alternative 3: New Replacement K-5 School and Residential Development Alternative	▪ A 600-student capacity K-5 school would be constructed on the 10-acre portion of the project site. ▪ Reduction in total building area to accommodate 600 students instead of 1,200 students~~, and all buildings would be one story high~~. ▪ The remaining 10 acres would be developed with 160 residential units. ▪ All four baseball fields would be removed (one large and one small fields with lights and two small fields without lights).

Page 7-8, Section 7.5, Alternative 2: New Expanded K-8 School and Two New Baseball Fields Retention Alternative. The following text is modified to correct an editorial error.

Under this alternative, two eastern small baseball fields would be retained, and no residential units would be developed. This alternative is intended to reduce ~~the significant and unavoidable~~ recreation impacts.

Page 7-13, Section 7.6, Alternative 3: New Replacement K-5 School and Residential Development Alternative. The following text is modified in response to Comment letter RR7 from Jack Hacienda.

With the maximum capacity of 600 students, it is assumed that one of the buildings could be eliminated, or two of the classroom buildings could be one story instead of two stories, since the number of classrooms could be reduced by approximately 50 percent.

5. Revisions to the Recirculated Draft EIR

Page 7-18, Section 7.7, Alternative 4: New Expanded K-8 School and Four Baseball Fields Retention Alternative. The following text is modified to correct an editorial error.

The project site would be developed as a K-8 school with 1,200 students as with the proposed project, but the athletic fields and hardcourts design would be modified to maintain the existing four baseball fields. This alternative is intended to reduce ~~the significant and unavoidable~~ recreation impacts.

Page E-6, Appendix E, VMT Technical Memo. The following text is modified in response to Comment letter RR7 from Jack Hacienda.

These students would no longer have to attend other schools such as nearby Cedarlane Academy located approximately 1 mile to the west after completing 5th grade. Therefore it is more appropriate to evaluate the school component of the project in terms of an overall net change in VMT associated with enrollment shifts. ~~Therefore f~~For this analysis, a potentially significant VMT impact would occur if the school component of the project would result in a net increase in existing total VMT. ~~For this analysis,~~ For the proposed project, VMT change would primarily result from the change in local students in grades 6 to 8 within District boundaries attending Wedgeworth compared to another school in the District.