RESPONSES TO COMMENTS

FINAL INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION (IS/MND)

LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION PROJECT

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1.0 INTRODUCTION

This Responses to Comments document (RTC), responds to comments received on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Laguna Beach High School Pool Modernization Project (proposed project). The RTC, Draft IS/MND, including the Mitigation Monitoring and Reporting Program, constitute the Final Initial Study/Mitigated Negative Declaration, and the CEQA compliance documentation for the proposed project. .

Section 15074 (b) of the State of California Environmental Quality Act (CEQA) Guidelines states: "Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including initial study and comments received) that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis." Pursuant to Section 15074 (b) of the CEQA Guidelines, the Laguna Beach Unified School District (LBUSD) is making available responses to the comments received during the public review process to provide further disclosure that it has considered the proposed mitigated negative declaration, with all comments received during the public review process for the proposed project.

1.1 Background of the Environmental Review Process for the Project

The IS/MND, along with a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (see **Attachment A**), was released for public review beginning January 17, 2025, through February 17, 2025. The agency review period was from January 21, 2025, through February 19, 2025. In addition, the NOI was posted on January 21, 2025, at the LBUSD District Office at 550 Blumont Street, Laguna Beach, CA 92651.

The NOI was also posted at the Orange County Clerk-Recorder on January 23, 2025 (see **Attachment B**), and copies of the IS/MND were made available for review at the following locations:

- LBUSD website: https://www.lbusd.org/departments/facilities/bids-and-public-notices
- LBUSD Office: 550 Blumont Street, Laguna Beach, CA 92651

A hard copy of the NOI was mailed by LBUSD to 144 residents and property owners located within 500 feet of the project site. The NOI and a map showing the locations to which notices were mailed can be found in **Attachment C**.

Additionally, the NOI was published in The Orange County Register on January 17, 2025 (see **Attachment D**).

The NOI released on January 21, 2025, provided notice of a public hearing to be held at Thurston Middle School on March 13, 2025. A revised NOI, changing the date of the hearing to March 20, 2025, was released, mailed and posted on March 7, 2025.

1.2 Tribal Consultation

The Laguna Beach Unified School District (the Lead Agency) initiated AB 52 consultation with local tribes for the Laguna Beach High School Pool Modernization project.

Elia Wahlstrom Rogers, Administrative Assistant, Facilities with the Laguna Beach Unified School District prepared and sent letters via certified mail on January 2, 2025, to the 20 contacts representing 12 tribes on the NAHC list provided by UltraSystems informing them of the project and asking if they wished to participate in AB 52 consultation. The letters conveyed that the recipient has 30 days from the receipt of the letter to request AB 52 consultation regarding the project. Follow up telephone calls made January 28, 2025, to non-responding tribes. The letters were sent via certified mail to:

- Temet Aguilar, Chairperson: Pauma Band of Luiseno Indians
- Charles Alvarez, Chairperson: Gabrielino-Tongva Tribe
- Christina Conley, Cultural Resources Administrator: Gabrielino Tongva Indians of California Tribal Council
- Norma Contreras, Chairperson : La Jolla Band of Luiseño Indians
- Robert Dorame, Chairperson: Gabrielino Tongva Indians of California Tribal Council
- Sam Dunlap, Cultural Resources Director: Gabrielino-Tongva Tribe,
- Shasta Gaughen, Tribal Historic Preservation Officer, Pala Band of Mission Indians
- Sandonne Goad, Chairperson: Gabrielino/Tongva
- Sonia Johnston, Chairperson, Juaneño Band of Mission Indians
- Heidi Lucero, Chairperson, THPO, Juaneño Band of Mission Indians Acjachemen Nation -84A
- Christina Swindall Martinez, Secretary, Gabrieleño Band of Mission Indians - Kizh Nation
- Anthony Morales, Chairperson: Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Christopher Nejo, Legal Analyst/Researcher, Pala Band of Mission Indians
- Joseph Ontiveros, THPO: Soboba Band of Luiseño Indians
- Joyce Perry, Cultural Resources Director, Juaneño Band of Mission Indians Acjachemen Nation -Belardes
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians
- Andrew Salas, Chairperson: Gabrieleño Band of Mission Indians - Kizh Nation
- Jessica Valdez, Cultural Resource Specialist: Soboba Band of Luiseño Indians
- Isaiah Vivanco, Chairperson: Soboba Band of Luiseño Indians
- Alexis Wallick, Assistant THPO, Pala Band of Mission Indians

Chairman Andrew Salas with the Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) responded January 6, 2025, requesting consultation, which was scheduled for February 25, 2025, via telephone. Brandy Salas contacted Ms. Rogers on February 24, 2025, to inform her Chairperson Salas was not available for the February 25th meeting; it was agreed that consultation would be conducted via email. An email with suggested mitigation measures was received via email on Feb. 25, 2025, from the Kizh Nation and the District agreed to them on Mar. 3, 2025. These mitigation measures included: retain a Native American monitor prior to the commencement of any ground-disturbing activity at the Project Site and in the event tribal cultural resources are discovered during Project construction, construction activities shall cease in the immediate vicinity of the find. (See **MM-TCR-1 and 2**). Ms. Rogers informed the tribe that the District would contact them late this year to initiate the mitigation measures depending upon construction timelines.

Joyce Perry with the Juaneño Band of Mission Indians – Acjachemen Nation – Belardes (Juaneño-Belardes) responded January 28, 2025, via telephone requesting consultation, and noting questions about project soil disturbance; Ms. Rogers returned the call the same day to respond to the questions and set a meeting; there was no answer and a voicemail was left. Ms. Rogers met with Ms. Perry February 7, 2025, at which time she recommended a member of the Juaneño Band-Belardes conduct tribal monitoring during ground disturbance and be informed two-months prior to construction activity to initiate the process. (Ms. Rogers, personal communication with O'Neil, February 7, 2025.) (See **MM-TCR-2**). Proposed Mitigation Measures were provided by Ms. Perry on March 7, 2025, and involve Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial) and Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. (See **MM TCR-4 and MM TCR-5**)

The Pala Band of Mission Indians responded January 15, 2025, via email stating the project site is outside their tribal Boundary though does consider it within their Traditional Use Area; they declined consultation.

Letters to the Gabrielino-Tongva Tribe and the Juaneño Band of Indians – S. Johnston were returned, and so calls were made to both on January 21 and 28, 2025 with no response. The remaining tribes were called January 28, 2025: The Gabrielino/Tongva San Gabriel Band of Mission Indians were called with no response and a voicemail message was left; the La Jolla Band of Mission Indians were called with no response and a voicemail message was left; the Santa Rosa Band of Cahuilla Indians answered the call, declining consultation as the project site is out of their tribal jurisdiction; Jessica Valdez with the Soboba Band of Luiseño Indians declined consultation and stated they defer to tribes closer to the project area; the tribal assistant with the Pauma Band of Luiseno Indians stated that the tribal council reviews all letters and will respond if interested. Chairperson H. Lucero with the Juaneño Band of Mission Indians, Acjachemen Nation – 84 A, did not respond to the letter and did not answer telephone calls made January 28th and February 7, 2025. Chairperson Sandonne with the Gabrielino/Tongva did not respond to the letter and did not answer telephone calls made January 28th and February 7, 2025. (Ms. Rogers, personal communication with O'Neil, February 7, 2025.)

The Gabrielino-Tongva Tribe responded to the email and on a call from Ms. Rogers January 28, 2025, Mr. Dunlap stated he would review the letter and get back to Ms. Rogers. He requested Ms. Rogers send the letter via email in case he could not locate the letter. Ms. Rogers provided the letter to Mr. Dunlap via email. He responded via email on February 11, 2025 with the following: "Thank you for sending the information regarding this project. The Gabrielino Tongva Tribe has no specific comments at this time and tribal consultation is not necessary. However, in the event that tribal

cultural resources are discovered during the construction of this project, the Gabrielino Tongva Tribe would request to be notified of the discovery." (See **MM TCR-3**.)

The Gabrielino Tongva Indians of California Tribal Council did not respond to the letter or email, but on a call to Chairperson Dorame January 28 and February 7, 2025, he said to reach out to Christina Conley. Ms. Rogers indicated that the District had also sent her a letter and called. Ms. Rogers left a voicemail on February 7, 2025, and followed up with a phone call and voicemail on February 10, 2025. (Ms. Rogers, personal communication with O'Neil, February 7, 2025, and March 7, 2025)

The past and present use of the project site and immediate area, for suburban development and school buildings in a hilly area resulting in extensive grading for all road and structure construction, suggests that ground on the project site has been heavily disturbed.

No human remains have been previously identified or recorded onsite. During the archaeological pedestrian survey, it was observed that the land in the area of the current pool facilities and surrounding parking lot had been heavily graded in the past to make it level for the high school campus construction in an area of steep topography. The cultural resources records search conducted by the SCCIC indicated there are no prehistoric sites recorded within the project APE, though seven have been recorded within the surrounding 0.5-mile buffer area. Therefore, the potential for subsurface prehistoric cultural deposits is considered to be medium. Also, the high school campus is in a region known to have been heavily used for habitation and natural resource gathering by the local Acjachemen and Tongva tribes (see Section 2.2.2.1 in **Appendix D**), which suggests the potential for the presence of cultural material.

The proposed project includes grading and excavation for a new swimming pool and associated facilities and parking. Grading activities associated with the development of the project would involve new subsurface disturbance and could result in the unanticipated discovery of unknown human remains, including those interred outside of formal cemeteries. In the unlikely event of an unexpected discovery, implementation of mitigation measures **TCR-1** concerning tribal monitoring, **TCR-2, TCR-3,** and **TCR-4** concerning the discovery of tribal resources, **TCR-5** concerning associated funerary objects, and human remains may be recommended to ensure that impacts related to the accidental discovery of human remains would be less than significant.

1.3 Responses to Comments

This document provides a response to comments received on the IS/MND. Ten comment letters were received during the public review period. Responses to these letters are found in **Section 2.0**, Public Comment Letters, and the original letters are included in **Attachment F**.

1.4 Intended Uses of this IS/MND

The IS/MND will be used by LBUSD in consideration of the proposed project. In accordance with CEQA Guidelines § 15074, the IS/MND will be used as the primary environmental document in consideration of all subsequent planning and permitting actions associated with the proposed project, to the extent such actions require CEQA compliance and as otherwise permitted under applicable law.

15074. CONSIDERATION AND ADOPTION OF A NEGATIVE DECLARATION OR MITIGATED NEGATIVE DECLARATION.

(a) Any advisory body of a public agency making a recommendation to the decision-making body shall consider the proposed negative declaration or mitigated negative declaration before making its recommendation.

(b) Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

(c) When adopting a negative declaration or mitigated negative declaration, the lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

(d) When adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects.

(e) A lead agency shall not adopt a negative declaration or mitigated negative declaration for a project within the boundaries of a comprehensive airport land use plan or, if a comprehensive airport land use plan has not been adopted, for a project within two nautical miles of a public airport or public use airport, without first considering whether the project will result in a safety hazard or noise problem for persons using the airport or for persons residing or working in the project area.

(f) When a non-elected official or decision-making body of a local lead agency adopts a negative declaration or mitigated negative declaration, that adoption may be appealed to the agency's elected decision-making body, if one exists.

Upon review and consideration of the IS/MND, the LBUSD may take action to adopt, revise, or reject the proposed project. A decision to approve the proposed project would be made with a resolution recommending certification of the IS/MND as part of the consideration of the proposed project. The LBUSD has prepared this IS/MND and has determined that the environmental impacts of the proposed project have been reduced to a less than significant level through mitigation measures.

2.0 PUBLIC COMMENT LETTERS

The following agencies and entities submitted written comments on the Draft IS/MND, during the 30-day public review period. The comment letters are provided in **Attachment F** of this document.

Letter	Agency, Organization, or Individual	Date
A	**Department of Toxic Substances Control**	**January 28, 2025**
Comment A-1	The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Laguna Beach High School Pool Modernization (Project). The Project will include demolition, excavation, grading, drainage, and building construction to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building.:	
Response A-1	This comment is noted by the District.	
Comment A-2	After reviewing the project, DTSC recommends and requests consideration of the following comments. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), §17210, §17213.1, and §17213.2, unless otherwise specifically exempted under section §17268. If the district is not using CDE State funds for the project, or is otherwise specifically exempt under section §17268, DTSC recommends the district continue to investigate, clean up the Site under the oversight of Orange County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the Office of Public-School Construction webpage. A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.	
Response A-2	This comment is noted by the District.	
Comment A-3	If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.	
Response A-3	This comment is noted, and these recommendations will be adhered to by the District.	
Comment A-4	DTSC recommends that all imported soil and fill materials should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and	

Letter	Agency, Organization, or Individual	Date
	fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.	
Response A-4	This comment is noted, and these recommendations will be adhered to by the District.	
Comment A-5	DTSC appreciates the opportunity to comment on the MND for the Laguna Beach High School Pool Modernization. If you would like to proceed with DTSC's school environmental review process, please visit DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via CEQA Review email for additional guidance.	
Response A-5	This comment is noted.	
B	**Annlia and Merton Hill**	**January 10, 2025**
Comment B-1	The Laguna Beach Unified School District (LBUSD) mailed a postcard with a publication date of January 17, 2025, although it was not postmarked until January 21. The postcard date started a clock with the California Environmental Quality Act (CEQA) setting a deadline of February 17, 2025, for residents' comments, questions, and concerns. However, the IS/MND (available at https://www.lbusd.org/departments/facilities/bids-and-public-notices) for the LBUSD is incomplete (it says so in the report), riddled with errors, inadequacies, and deceptions. Details matter. The IS/MND should be rejected on its face. Page 1 lists the project location as 625 Park Avenue, but on page 1-1 the site is 670 Park Avenue. "The proposed project is surrounded by residential structures to the west, south [sic] and east." What about north?	
Response B-1	The USPS meter indicia on the postcard mailer displayed a date of January 21. All other forms of the notice were posted on January 17. Additionally, the January 21 date was still well within the statutory requirement of 7 days for public hearings. The address has been verified; "625" is the high school address, "670" is the project site address. "North" is addressed in the subsequent sentence after west, south and east are addressed.	
Comment B-2	Proposed Construction "The pool currently has ten 25-yard lap lanes with an attached shallow kids' pool." (page 1) to be replaced by a 45-meter swimming pool (page 1). The 25-meter x 25-yard pool is to be replaced by a "45-meter x 25-yard pool, with 16 lanes in a north-south [sic] (25-yard) orientation." (page 1-1) This nearly doubles pool size.	

Letter	Agency, Organization, or Individual	Date
	The equipment/storage building will be replaced with a larger two-story 6,692 square-foot structure with an additional 554 square-foot public restroom and shower building. These will encroach on the parking lot, reducing the 17 stalls to 7 according to page 1-1 but to 5 according to Figure 3.3-3 PROPOSED SITE PLAN.	
Response B-2	The intent of the project was to keep capacity at the approximate current level of around 270 spectators. Figure 3.3-3 was an exhibit from the original submittal, which has been revised. The project as currently designed includes a seven-stall parking lot (including two ADA spaces). Figure 3.3-8 has been updated with most current plans. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
Comment B-3	Neighborhood Impacts These proposals can reasonably be assumed to change the neighborhood environment. The Lead Agency (LBUSD) has the responsibility to identify these impacts and to identify mitigation measures to avoid environmental impact. The mitigation measures should be specially spelled out. Neither the Identification of adverse effects nor the proposed mitigation of identified adverse effects in the IS/MND is adequate. High-sensitivity land uses include residences and religious institutions, both of which surround the proposed project. Table 2.2-1 states that to the east of the project are the LBHS Tennis Courts. But just above and to the east of the tennis courts are single family residences, as can be seen in Figure 2.1-2. Figure 2.2-2 PHOTOS 1 and 2 are deceptive, not showing these highly impacted single-family residences. The project would have substantial adverse environmental impacts on energy use, water use, noise, lighting, views, aesthetics, and parking. Transparency is the key. Transparency on the pool project has been lacking since the get-go. The project was “hidden under a bushel basket” and only after word leaked out and the community was aroused did the school board hold an “Open House” in May 2023 to present plans to the community. In fact, the lack of transparency and the deaf ears of the LBUSD led to a change in the LBUSD board. However, the old board voted to approve the project October 10, 2024, before the November 2024 election and before the newly constituted board could review the project. Then the incomplete IS/MND was mailed.	
Response B-3	Table 2.2-1 delineates all immediately adjacent uses in all four directions from the project site. Project Descriptions generally do not delineate non-abutting parcels. Specific sections within the Initial Study evaluate neighboring concerns and land uses as defined by CEQA for their respective thresholds. For example, sensitive noise receptors north and northeast of the tennis courts are shown in Figure 4.13-1.	

Letter	Agency, Organization, or Individual	Date
	The Initial Study reviewed the project for substantial adverse environmental impacts as detailed within the 2024 CEQA Statutes and Guidelines. Aesthetics and Views are reviewed in Section 4.1, Aesthetics. As noted in Threshold 4.1, the IS/MND reviewed for substantial adverse effect on a scenic vista, substantial damage to scenic resources, compliance with zoning and other regulations governing scenic quality, and new sources of substantial light or glare which would adversely affect day or nighttime views in the area. CEQA requires analysis for "*unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features"* that will substantially degrade the existing visual character or quality of public views. Private views are generally addressed by the predetermined zoning and land use regulations adopted by the City Council. This Initial Study is only required to review for compliance with those regulations (building setbacks and height limits, landscaping requirements, etc.) Energy is reviewed in Section 4.6 Energy. The California Emissions Estimator Model (CalEEMod) is a standard tool used in CEQA documentation to analyze energy impacts. In addition, onroad motor vehicle fuel consumption was calculated by UltraSystems using data from the USEPA-approved EMFAC2021(v1.0.2) emissions inventory web platform tool. As detailed in Section 4.6, the project would not result in wasteful, inefficient, or unnecessary consumption of electricity or fossil fuel. Water use is reviewed in Section 4.10 Hydrology and Water Quality and Section 4.19, Utilities and Service Systems. As noted, the pool would require the water supply to initially fill and maintain adequate water levels. However, the amount of water used by the proposed project in the long term would result in a minor increase in the existing water use of Laguna Beach High School as a whole according to review standards outlined within the 2024 CEQA Statutes and Guidelines. Noise is reviewed in Section 4.13, Noise. The analysis includes simultaneous ambient noise measurements in the immediate pool area and at nearby sensitive receptors, including one session during a water polo practice; calculation of offsite noise and vibration exposures during project construction; operating noise from onsite equipment, crowd noise, horns, etc.; and onroad noise from project-generated traffic. The project was reviewed using the most current guidelines prepared by the state noise officer as contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003 and reissued in 2017, the Noise Element of the City of Laguna Beach General Plan, and other criteria. Impacts were found to be less than significant under CEQA. Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 Pool Lighting, of the IS/MND noting the 24'-0" height of the proposed lighting. Additionally, the project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours and reduce spillover illumination.	

Letter	Agency, Organization, or Individual	Date
	Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. Parking considerations are not addressed under CEQA unless a project's proposed parking would exceed the parking requirements set forth by the relevant local jurisdiction's code or applicable regulations. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project. Additionally, it is noted that parking is no longer an impact required to be addressed under CEQA. The Initial Study/Mitigated Negative Declaration (MND) has been conducted in strict adherence to the 2024 California Environmental Quality Act (CEQA) Statutes and Guidelines, fulfilling all required notification protocols. A Notice of Intent (NOI) for the project was published in the Orange County Register on January 17, 2024, and a revised NOI was published March 7, 2025. Concurrently, notifications were mailed via USPS to all residential and commercial property owners within a 500-foot radius of the project site, consistent with CEQA regulations. Public noticing was also in conformance with the City of Laguna Beach Municipal Code § 25.05.065 Public notice, as required by local and State law. (https://ecode360.com/42898407#42898704) <u>Past meetings related to the project:</u> March 23, 2023 - Initial project proposals presented to the Board of Education (BOE) May 2, 2023 - LBHS Community Open House June 6, 2023 - Joint meeting with Laguna Beach City Council June 27, 2023 - BOE Study Session on LBHS pool September 28, 2023 - BOE Study Session on existing and potential pool use August 2024 - A community meeting regarding the LBHS pool modernization brought together community groups, pool users, aquatics parents, and city staff to present updates on conceptual designs and gather additional feedback from stakeholders. October 10, 2024 - A community meeting regarding the design, engineering, and CEQA. <u>Future meetings:</u> March 20, 2025 - AB 52 and Board Meeting @ 6 p.m. Laguna Beach City Hall, 505 Forest Avenue, Laguna Beach. All information regarding the Facilities Master Plan update which includes Pool Modernization project is publicly available on the Laguna Beach Unified School District's website (https://www.lbusd.org/departments/facilities/projects)	
Comment B-4	ENERGY USE – The increased size of the pool and support buildings will result in a net increase in use of electricity (for lighting, building cooling, and water distribution) and natural gas (for building and swimming pool heating). The larger than necessary pool and support buildings will result in wasteful or unnecessary consumption of energy. A smaller pool would require smaller mechanical accessories. The IS/MND states "The proposed project includes "the installation of … unknown utility…" (page 3-15) How	

Letter	Agency, Organization, or Individual	Date
	can one comment on an unknown? Higher energy use increases utility costs and may contribute to global climate change.	
Response B-4	Energy is reviewed in Section 4.6 Energy. The California Emissions Estimator Model (CalEEMod) is a standard tool used in CEQA documentation to analyze energy impacts. In addition, onroad motor vehicle fuel consumption was calculated by UltraSystems using data from the USEPA-approved EMFAC2021(v1.0.2) emissions inventory web platform tool. As detailed in Section 4.6, estimated electricity and natural gas use will increase. However, the increased usage will not be wasteful or inefficient due to the project's compliance with Title 24 energy efficiency standards. The project's use of solar photovoltaic panels will decrease fossil fuel-based energy consumption for building lighting and cooling. The project will deploy solar water heating panels to decrease fossil fuel-based energy usage for pool heating. The increase in energy will not require additional energy infrastructure as the usage will be within Southern California Edison's and Southern California Gas' energy supply capacities. Mentions of "unknown utility" have been corrected. This comment is noted.	
Comment B-5	WATER USE – The proposed 45-meter pool would hold 377,500 gallons of water (page 4.19-3), requiring 80% more fill-water than the current pool with a corresponding increase in evaporation, requiring even more water. Laguna is an arid region requiring imported water (with its ever-increasing cost) and where water-wise use is the aim of Laguna Beach County Water District. The LBUSD should also be water-wise. And this isn't "Centennial High School" as referred to on page 4.19-2. The IS/MND document is a sloppy cut and paste document.	
Response B-5	Water use is reviewed in Section 4.10 Hydrology and Water Quality and Section 4.19, Utilities and Service Systems. As noted, the pool would require the water supply to initially fill and maintain adequate water levels. However, the amount of water used by the proposed project in the long term would result in a minor increase in the existing water use of Laguna Beach High School as a whole according to review standards outlined within the 2024 CEQA Statutes and Guidelines. "Centennial" has been changed to reflect "Laguna Beach." This comment is noted and the issue corrected." Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment B-6	NOISE - The high-sensitive land uses around the project include the single-family neighborhoods directly north, west, east, and northeast and The Church of Jesus Christ of Latter-day Saints to the west. Noise samplings were conducted on only two days (November 6, 2024, 6:13-7:45 am and November 15, 2024, 3:39-5:19 pm). Samples should have been taken as well during active water polo matches with shot clocks and amplified sound. Water polo shot clocks can have a sound level of up to 120 decibels (dB). Examples of other 120 dB sounds include jet engine, ambulance siren, chain saw, rock concert, and thunderclap, The World Health Organization and the U.S. Environmental Protection Agency recommend keeping environmental noise levels below 70 db. Because the decibel scale is logarithmic, not linear, each 10 dB increase represents a 10-fold increase in sound intensity. For example, a 10 dB sound is 10 times more powerful than 0 dB, but a 70 dB sound is 10,000,000 times louder. Additionally, noise levels should have been measured at houses above the tennis courts which are in a direct line for noise and light pollution. The IS/MND assumes the	

Letter	Agency, Organization, or Individual	Date
	local noise ordinances will be enforced and places the onus on the offended to file a complaint. Rather amplified sound should be banned, and dB level of water polo clock should be minimized. Amplified sound from the football/track stadium continues to be a problem. Additional noise would come from the operation of mechanical equipment (e.g., air conditioners, pumps).	
Response B-6	The descriptions of activities at the pool during the November 15, 2024, sampling inadvertently did not mention that water polo activities were also observed. The noise measurement technician did mention: • Music in the background playing with a large speaker • Water polo team practice in session • Claps from audience • Loud cheers, whistle blowing, coach/referee yelling • Team yelling, water splashing, loud horn A new analysis of the poolside noise measurement data indicates that the average noise levels during water polo activities are 11.1 dBA L_{eq} higher than during just swimming. The IS/MND was revised to include this information. In addition, UltraSystems estimated future noise exposures at seven sensitive receivers, for both expanded swimming activity and a water polo match. Section 4.13 of the IS/MND has been revised to include this information. However, the revision does not change the conclusions of the IS/MND.	
Comment B-7	LIGHTING - The proposal claims the project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations. However, 40-ft sport lighting is equivalent to a 4- story building and is nearly twice the height street lights on Park Avenue. The neighborhood paid to underground their utilities, now four poles are to project into views. Outdoor lighting can create (1) excessive glare which is annoying and can causing safety problems, (2) light trespass which can reduce a sense of privacy, and (3) light pollution which decreases ability to see the natural night sky. How many stars can you see at night? The school neighborhoods fought this battle once, when lights were installed on the baseball field, but which were finally removed. Now we live with the football/track stadium lights.	
Response B-7	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 Pool Lighting noting the 24'-0" height of the proposed lighting. As noted, the project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours and reduce spillover illumination	

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	Errata has been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment B-8	VIEWS - All existing planters in the current facility will be demolished and new vegetation installed. Figure 3.3-10 POOL CONCEPTUAL PLANTING PLAN shows the proposed replacement vegetation palette, but no specific placement plans are presented. The tall trees included in the planting plan are inappropriate for view preservation (Washingtonia robusta, Strelitzia Nicolai). Additionally, the "Tiki torch" palms are considered a fire hazard and are inappropriate near structures and areas prone to wildfire, as indeed this area is. The 4-story sport lighting projects way over the area and into the view shed as do the closely spaced palm trees on Park Avenue installed by the school.	
Response B-8	Aesthetics and Views are reviewed in Section 4.1, Aesthetics. As noted in Threshold 4.1, the IS/MND reviewed the project for substantial adverse effect on a scenic vista, substantial damage to scenic resources, compliance with zoning and other regulations governing scenic quality, and new sources of substantial light or glare which would adversely affect day or nighttime views in the area. CEQA requires analysis for "*unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features"* that will substantially degrade the existing visual character or quality of public views. Private views are generally addressed by the predetermined zoning and land use regulations of the respective local jurisdiction. The landscaping provided is conceptual. All landscaping would be required to comply with the California Department of Education, Codes and Regulations for School Facilities Design.	
Comment B-9	AESTHETICS – The IS/MND ironically states that the current pool facility was designed by preservationist architect Milford Wayne Donaldson. He kept the historic 1936 WPA pool building (originally classrooms) in his design. The physical demolition of this historically significant building is a substantial adverse change. With the new configuration the setback from Park Ave is non-existent for the indoor showers and not much larger for the pump room building.	
Response B-9	The Cultural Resources Inventory report has been updated to include research on the original WPA-related pool facilities building dating to 1936, and the current building which will be demolished. It was determined that the original 1936 WPA constructed building was demolished in c1992 and replaced by a new building designed to reflect the 1936 structure. While the current building greatly resembles the 1936 building, records provided by the District and review of historic aerial photos document that all buildings at the project site were demolished in preparation for constructing the current pool facility in 1992-1994. Also, examination of the current structure shows variations in the dimensions, windows, roof fixtures, as well as different construction materials than present in the 1936 building. The 1990s architect, Wayne M. Donaldson, is a renowned historical architect who likely designed a replica of the original in homage to the classic WPA work. Setback(s): Comment has been noted.	

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	Note: Government Code § 53094 allows a governing board of a school district to render a city or county zoning ordinance inapplicable to a proposed use of a property by a school district for classroom facilities by a two-thirds vote.	
Comment B-10	PARKING - The larger two-story locker/equipment building will extend into the current parking lot and reduce the number of stalls from 17 to 5. Figure 3.3-1 of the EXISTING SITE PLAN shows that all parking spaces in the parking lot and surrounding streets are already filled to capacity. And Manzanita Drive is NOT "a two-lane roadway with sidewalks on both sides" (page 4.17-2 to 4.17-3). The only sidewalk on Manzanita is in front of the pool parking lot. The environmental factors mentioned above would be affected by this project. Too many these are great and important changes worthy of attention. LBHS is the smallest public high school in Orange County. The 2023 census was 888 with a projected 2026 census of 750 (page 3-1), a 16% decrease. And with an expected decrease in the future (page 4.3-9). The 2023 Laguna Beach census was 22,332, a decrease from 2020. Despite decreasing city and school populations, LBUSD has proposed a larger "aquatic center," not just a bigger pool for fewer people. More organized events are likely at the proposed pool as has happened at the football/track stadium and will attract more attendees as well as visitors with additional noise and traffic. A 45-meter pool is not needed for CIF high school swimming or water polo. A 35- to 40-meter pool meets the original objectives set out by the board. It addresses the ideal configuration for CIF water polo, supports multiple team practices, and expands the number of swim lanes. It is a common size for high schools. It is cheaper to construct and operationally more efficient. The neighborhoods surrounding the pool are 10x closer to the pool (3 abut the pool) than the average. As a result, the negative impact is significantly greater. An analysis of a 35- to 40-meter pool in the existing footprint with the option of retaining the existing buildings should be adequately and accurately explored by the school board before a decision is made. This is a 24/7 issue for the neighborhood; people live here. Energy Use: Increased. Water Use: Increased Light Pollution: Increased Noise Pollution: Increased Views: Impacted Aesthetics: Demolished Parking: Decreased JUST BECAUSE YOU CAN DOESN'T MEAN YOU SHOULD. JUST BECAUSE YOU DON'T HAVE TO DOESN'T MEAN YOU SHOULDN'T (follow city rules).	
Response B-10	Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	

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	Under the Joint Use Agreement (JUA) between the City and the District, the City is responsible for managing the pool operations for approximately 70% of the time, primarily to support community aquatics programs. The remaining 30% is reserved for the District to conduct its athletic programs. The District's subcommittee indicates there are no plans to host regional aquatic events at the new pool that would surpass historical attendance. The District's staff will recommend enforcing this through a policy. If there is any potential deviation from this policy in the event the City requests joint use of a larger District-owned pool, it is advised that both the City Council and the District Board must approve any exceptions regarding hosting larger regional events. Despite declining school enrollments, there is an anticipated increase in community demand for the pool services, negating the concern of underutilization or as expressed, "*a bigger pool for fewer people.*" Aesthetics and Views are reviewed in Section 4.1, Aesthetics. As noted in Threshold 4.1, the IS/MND reviewed for substantial adverse effect on a scenic vista, substantial damage to scenic resources, compliance with zoning and other regulations governing scenic quality, and new sources of substantial light or glare which would adversely affect day or nighttime views in the area. CEQA requires analysis for "*unique views, and views identified in local plans, from scenic highways, or of specific unique structures or landscape features"* that will substantially degrade the existing visual character or quality of public views. Private views are generally addressed by the predetermined zoning and land use regulations adopted by the City Council. This Initial Study is only required to review for compliance with those regulations (building setbacks and height limits, landscaping requirements, etc.) Energy in reviewed in Section 4.6. Energy. The California Emissions Estimator Model (CalEEMod) is a standard tool used for CEQA to analyze energy impacts. As detailed in Section 4.6, the project would not result in wasteful, inefficient, or unnecessary consumption of electricity. Water use is reviewed in Section 4.10 Hydrology and Water Quality and Section 4.19, Utilities and Service Systems. As noted, the pool would require the water supply to initially fill and maintain adequate water levels. However, the amount of water used by the proposed project in the long term would result in a minor increase in the existing water use of Laguna Beach High School as a whole according to review standards outlined within the 2024 CEQA Statutes and Guidelines. Noise is reviewed in Section 4.13, Noise. The analysis includes simultaneous ambient noise measurements in the immediate pool area and at nearby sensitive receptors; calculation of offsite noise and vibration exposures during project construction; operating noise from onsite equipment, crowd noise, horns, etc.; and onroad noise from project-generated traffic. The project was prepared using the most current guidelines prepared by the state Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 **Pool Lighting**, of the IS/MND noting the 24'-	

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	0" height of the proposed lighting. As noted, the project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours and reduce spillover illumination. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
C	**Gary Kasik**	**February 13, 2025**
Comment C-1	GENERAL OBSERVATIONS The impact assessment is minimized by representing the project as "replacement" and "modernization" with little to no recognition of the substantial size increases, three times increase in density of use, and more than doubling spectator capacity. To properly assess before/after impacts it would be helpful to include BEFORE dimensions when referring to the new plans for: 1. Buildings (Sq ft) 2. Deck space 3. Seating Capacity and Orientation 4. Lighting type, quantity, and orientation Operational plans presented by the district envision three concurrent waterpolo (WP) practices versus one today. Swimming practice common standards presented by the district reference 7-8 swimmers per lane so with eight lanes being added that provides the potential of over 50 additional concurrent swimmers. I saw no reference to existing spectator capacity but from photos I estimated +/-100 with that more than doubling to 272; as well as changing the orientation of the seating from north facing to east facing. There are multiple references that contradict planned use as presented by the district in prior meetings. While staying mostly inside the existing footprint with similar uses, it's important to represent density and capacity changes. Examples of misleading descriptions include: "Since this is a pool replacement project, frequency of use, number of attendees, and additional sound associated with water recreation are not expected to change." "The use of the modernized pool is expected to remain relatively the same as that of the existing facility." "The project is not expected to result in an increase to average daily traffic…" And given a primary objective of the project was to support more home games it is inappropriate to say "…nor will the number of swimming events change greatly...." The notice card states, "A public hearing before the planning commission of the city of Laguna Beach…." I can find no corresponding schedule for the city, so added clarity on the role of the city would be helpful. Additionally, does the approval process require LBUSD board approval and, if so, a simple majority?	

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Response C-1	Public hearings for a project under CEQA are typically scheduled after the public review period for the environmental documents is complete, which usually begins once the Notice of Intent (NOI) and the draft Initial Study are published. The Initial Study/Mitigated Negative Declaration (MND) has been conducted in strict adherence to the 2024 California Environmental Quality Act (CEQA) Statutes and Guidelines, fulfilling all required notification protocols. A Notice of Intent (NOI) for the project was published in the Orange County Register on January 17, 2024, and a revised NOI was published March 7, 2025. Concurrently, notifications were mailed via USPS to all residential and commercial property owners within a 500-foot radius of the project site, consistent with CEQA regulations. Public noticing was also in conformance with the City of Laguna Beach Municipal Code § 25.05.065 Public notice, as required by local and State law. (https://ecode360.com/42898407#42898704) <u>Past meetings related to the project:</u> March 23, 2023 - Initial project proposals presented to the Board of Education (BOE) May 2, 2023 - LBHS Community Open House June 6, 2023 - Joint meeting with Laguna Beach City Council June 27, 2023 - BOE Study Session on LBHS pool September 28, 2023 - BOE Study Session on existing and potential pool use August 2024 - A community meeting regarding the LBHS pool modernization brought together community groups, pool users, aquatics parents, and city staff to present updates on conceptual designs and gather additional feedback from stakeholders. October 10, 2024 - A community meeting regarding the design, engineering, and CEQA. <u>Future meetings:</u> March 20, 2025 - AB 52 and Board Meeting @ 6 p.m. 505 Forest Avenue, 505 Forest Avenue, Laguna Beach. All information regarding the Facilities Master Plan update which includes Pool Modernization project is publicly available on the Laguna Beach Unified School District's website (https://www.lbusd.org/departments/facilities/projects)	
Comment C-2	Lighting Lighting is to be reviewed and approved by city staff to be in compliance with Good Neighbor Lighting regulations. City light regulations are acknowledged to be dated in regard to current available technology as well as being primarily residential focused. Use of the most current available technology to control glare and light leakage should be deployed along with timers or other methods to manage use hours. In addition to lights location, orientation of scoreboards, clock timers, etc. should be addressed to minimize leakage outside the footprint. Figure 3.3-3 lists four 40' light standards but 3.3.5 references 24'?	

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	Current functions of the lights on the neighboring tennis courts are inconsistent so is "linking" or upgrading should be considered.	
Response C-2	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 **Pool Lighting**, of the IS/MND noting the 24'-0" height of the proposed lighting. As noted, the project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours and reduce spillover illumination Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment C-3	Noise Representing "no or minimal impact" due to the project being "replacement" with no increased use is inconsistent with the stated district operational plan. In the assessment it is important to view noise and time together as noise at 6:00am has a different impact than the same noise at 1:00pm. When the current pool was proposed in 1992-3 local residents, many of whom are still in the same homes, were promised sound mitigation that was never addressed. The district has proposed reduced hours of operation given the expanded capacity of the facility including ending at 8:00pm but have been essentially silent on morning hours. What are planned hours of operation and what activities will be scheduled in what time slots? WP at 6:00am (potentially 3X current) would not be in compliance with the city noise ordinance that prevents construction or landscape work before 8:00am. Has there been consideration to follow city noise ordinances that apply to residents? The sound testing poorly aligned with actual and planned uses as the tests were performed during the quietest use activities. A primary stated objective of the district was to support multiple concurrent water polo practices. District plans show three teams in the water at the same time. Noise sampling of swimming and light conversation" versus expected use of horns, bells, whistles, and shouting from three WP teams simply isn't representative. The statement "The pool is surrounded by high walls and, on the north side by a building." is not accurate. The east side shows a very low wall and the existing chain link fencing of the tennis courts. Sound mitigation techniques and solutions were presented at a public district meeting on June 27, 2023, but it appears none have been incorporated into current plans. Given the near 3X increase in spectator capacity, change of spectator seating orientation, increased use, increased density, and increased events, consideration should be given to added sound mitigation including the techniques presented of attenuation walls, covered facility, audio design and time restrictions.	

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	A sound attenuation wall that "traps" as much noise as possible inside the envelope to replace the west side fence of the tennis courts should be included in the plans. Construction noise is a concern but the commitment to follow city building ordinances on sound and hours of operation is expected to be a mitigating factor.	
Response C-3	The second session of ambient noise measurements (in November 15, 2024) actually did occur while water polo-related activities were underway. The noise measurement technician noted: • Music in the background playing with a large speaker. • Water polo team practice in session. • Claps from an audience. • Loud cheers, whistle blowing, coach/referee yelling. • Team yelling, water splashing, loud horn. This description was inadvertently omitted from the IS/MND. It has been added. In addition, we have now estimated the increases in poolside noise between swimming and water polo activities. We have also expanded the analysis of operational noise emissions to include the effect of increasing the number of pool lanes by 60 percent, and noise from a water polo match. For the initial calculations, intervening walls and house were not taken into account. At one sensitive receiver, exposures would exceed CEQA criteria. However, when an existing intervening wall is taken into account, the noise level at that receiver would also be less than significant. When intervening walls for all the other sensitive receivers are evaluated, results for all the other sensitive receivers would be lower. We have also expanded the analysis of operational noise emissions to include an increased number of simultaneous water polo matches. We have reviewed the sound mitigation techniques and solutions that were presented at a public district meeting on [July] 2023. They appear to be example measures that were implemented for a completely different project and were not explicitly proposed for the current project. Nonetheless, the community's desire for a sound wall is noted and will be forwarded to the decision-makers to be considered.	
Comment C-4	Traffic and Parking Parking in the vicinity of the high school is currently heavily constrained when school is in session, so even minor impacts should be carefully considered. Section 3.3.4 implies there may be an option ("may require") that doesn't result in lost parking spaces. Is there an option under consideration that is not included in the materials? Figure 3.3-3 shows five parking stalls but the accompanying narrative states seven; this should be consistent. The statements that traffic related impacts will not increase because use of the facility is not expected to increase do not align with district presentations on expected operation.	

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	Options should be reviewed with the city to maximize parking while minimizing resident impact. T-lined parking spots, red curbs, clear signage may provide better use of existing parking and unnecessary city enforcement. Construction Specific How many total parking spots are eliminated during construction? Figure 3.4-2 shows eliminated spots on Park but does the no parking extend further east than covered in the graphic? How many transient (daily in/out) contractor/labor vehicles are anticipated during construction? The intersection of Park and Manzanita is a heavy concentration of vehicles and student pedestrians crossing Park north and then Manzanita west. The plans call for adding a "staging and entrance" to that same location. It seems sightlines may be impacted so consideration should be given to relocating crossing points during construction. Consideration should be given to a reserved construction only parking section in the district parking lot. That would provide assured labor parking avoiding circling for parking and back up horns of construction trucks in residential areas. The parking lot is very close to construction and can be adjusted for when school is not in session.	
Response C-4	Figure 3.3-3 was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most site plan delineating seven parking spaces and two ADA compliant parking spaces. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
Comment C-5	Safety Comments regarding parking and construction traffic in heavily traveled pedestrian areas are obviously a priority. Keep in mind key student arrival and dismissal time when extra caution (crossing guards?) should be considered. Often the "mass exodus" from the high school is augmented with toddlers coming back from an outing to Anneliese School or being picked up by parents. The pool is in a bit of a sunken space so details of how to secure the site from inappropriate access should be addressed. Does the use of a pool cover, as outlined in the plans, present a higher drowning risk should "unauthorized" access occur? Perhaps technology that senses pool or cover contact triggering an alert?	
Response C-5	This comment is noted.	
Comment C-6	Other Aesthetics - The project plans and narrative represent there will be no view impact and, in fact, states there will be a minor view improvement. The artist renderings are	

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	helpful, but they obviously can't address every dimension, and the orientation of the building is changing. I would request the buildings be "staked" as is done for any residential construction to provide clarity and avoid surprises during construction. Near the end of Section 4.1.a the building and pool are referred to as "similar to those already in place." Given that the pool is 80% larger and the building is now two stories and significantly larger it seems that description could be more accurate. I counted several hundred solar panels, most with direct line of sight into the neighborhoods above and surrounding the pool. What actions are being taken to eliminate reflection or glare from the panels? I didn't see any ADA specifications but assume that's a requirement. The current pool configuration has a sloped ramp that I don't see in the new plans. I would assume a mechanical chair is being proposed? That's a significant loss of functionality for those with physical limitations. Have you researched and are prepared to defend that the architect of the existing building has no historical or "important person" classification as noted in Section 4.5.3-a "that are associated with the lives of persons significant in our past."	
Response C-6	Light, glare, access: The comments have been noted. The Cultural Resources Inventory report has been updated to include research on the original WPA-related pool facilities building dating to 1936, and the current building which will be demolished. While the current building greatly resembles the 1936 building, records provided by the District and review of historic aerial photos document that all buildings at the project site were demolished in preparation for constructing the current pool facility in 1992-1994. Also, examination of the current structure shows variations in the dimensions, windows, roof fixtures, as well as different construction materials than present in the 1936 building. The 1990s architect, Wayne M. Donaldson, is a renowned historical architect who likely designed a replica of the original in homage to the classic WPA work. The current main pool facilities building was constructed c1993 is therefore does meet the criteria for a historic-period building. Therefore, there is no requirement to record and evaluate the structure . However, there will be an added mitigation measure that will be added to conduct an historic site DPR record and NRHP / CRHR evaluation. Cultural Resources.	
Comment C-7	Additional Observations I offer the following. as "proofreading" to help improve the quality of the final document. While many may seem minor, the quantity and materiality of some could lead toward a quality conclusion of the overall document: *There are several references to Appendices including in the Table of Contents but was unable to find them. *The notice card says the hearing will be before the Planning Commission of the City of Laguna Beach, but the location is a district facility.	

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	1.1 Refers to a 50M pool. 1.1 Address 670 or 625 4.9.c Tony Tobin Elementary School is not near the project. 4.9.d Does not apply the project location. 4.9.-1 Locations listed are in near project site 4.9.e The airport referenced is not the nearest. 4.17.c Manzanita does not have sidewalks on both sides. 4.19.a States heating by natural gas, Figure 3.3-8 shows solar. 419.a Water Treatment speaks to Centennial High School? 4.19.d The city does not contract with Waste Management but rather CR&R	
Response C-7	• An exhibit from the original submittal. 45-meter x 25-yard pool is the proposed size. This has been corrected. • The address of the high school is "625", the proposed project is "670". • Corrected. Anneliese Schools— Manzanita, Elementary School has replaced Tony Robins Elementary. • "*No action required*" at these sites, so they are not addressed. • Corrected. John Wayne Airport has been added. • The Manzanita sidewalk statement has been revised. • The proposed project will utilize both natural gas and solar. Solar panels would be complementary to natural gas. • "Laguna Beach" has replaced "Centennial." • "CR&R" has replaced "Waste Management." Item corrected.	
D	**Amber Sparks**	**February 13, 2025**
Comment D-1	Dear Mr. Zajda, I am writing to formally express my concerns regarding the Laguna Beach High School Pool Modernization Initial Study and Mitigated Negative Declaration (IS/MND). As a mother, business owner, and active member of the Laguna Beach community, I urge the District to reconsider the proposed expansion to a 45-meter pool due to its excessive scale, environmental impact, and unnecessary cost.	
Response D-1	This comment is noted.	
Comment D-2	I have first-hand experience with the pool—I take my children there every summer, and I regularly exercise at the facility twice a week. While it is clear that the pool and facilities need improvement, the proposed expansion goes far beyond what is necessary and would result in the loss of valuable community assets, including:	

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	• The kiddie pool, which is a vital resource for families with young children. • Existing locker rooms, which would be relocated to an already limited parking area. • Parking spaces, further straining an area that already struggles with availability.	
Response D-2	This comment is noted.	
Comment D-3	Additionally, the IS/MND contains numerous inconsistencies that must be addressed: • Increased Water and Energy Use: A 45-meter pool will require significantly more resources for heating, maintenance, and water refilling, yet the IS/MND does not adequately account for these impacts. • Noise and Light Pollution: The addition of 40-foot lighting poles and increased water polo activity will introduce excessive glare, noise, and disruption to surrounding residents, which the IS/MND fails to assess properly. • Traffic and Parking Issues: The loss of parking spaces and increased usage will worsen congestion in an already impacted neighborhood. • Lack of Transparency and Community Engagement: The approval process has lacked meaningful community input, and the IS/MND does not sufficiently consider alternatives that would better align with community needs.	
Response D-3	The purpose of the Initial Study is to review for compliance with the 2024 CEQA Statutes and Guidelines. Water use is reviewed in Section 4.10 Hydrology and Water Quality and Section 4.19, Utilities and Service Systems. As noted, the pool would require the water supply to initially fill and maintain adequate water levels. However, the amount of water used by the proposed project in the long term would result in a minor increase in the existing water use of Laguna Beach High School as a whole according to review standards outlined within the 2024 CEQA Statutes and Guidelines. Energy is reviewed in Section 4.6 Energy. The California Emissions Estimator Model (CalEEMod) is a standard tool used in CEQA documentation to analyze energy impacts. In addition, onroad motor vehicle fuel consumption was calculated by UltraSystems using data from the USEPA-approved EMFAC2021(v1.0.2) emissions inventory web platform tool. Estimated electricity and natural gas use will increase. However, the increased usage will not be wasteful or inefficient due to the project's compliance with Title 24 energy efficiency standards. The project's use of solar photovoltaic panels will decrease fossil fuel-based energy consumption for building lighting and cooling. The project will deploy solar water heating panels to decrease fossil fuel-based energy usage for pool heating. The increase in energy will not require additional energy infrastructure as the usage will be within Southern California Edison's and Southern California Gas' energy supply capacities. Noise is reviewed in Section 4.13, Noise. The analysis includes simultaneous ambient noise measurements in the immediate pool area and at nearby sensitive receptors; calculation of offsite noise and vibration exposures during project construction; operating noise from onsite equipment, crowd noise, horns, etc.; and onroad noise from project-generated traffic. The project was reviewed using the most current guidelines prepared by the state noise officer as contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003 and	

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	reissued in 2017, the Noise Element of the City of Laguna Beach General Plan, and other criteria. Impacts were found to be less than significant under CEQA. Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.5-5 **Pool Lighting** of the IS/MND noting the 24-foot height of the proposed lighting. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. The project would adhere to all applicable state codes and regulations pertaining to lighting and school facilities design. Parking. Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project. Transportation. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel; the project is not expected to generate more than 110 new daily trips. It should be noted that although the pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. The Initial Study/Mitigated Negative Declaration (MND) has been conducted in strict adherence to the 2024 California Environmental Quality Act (CEQA) Statutes and Guidelines, fulfilling all required notification protocols. A Notice of Intent (NOI) for the project was published in the Orange County Register on January 17, 2024, and a revised NOI was published March 7, 2025. Concurrently, notifications were mailed via USPS to all residential and commercial property owners within a 500-foot radius of the project site, consistent with CEQA regulations. Public noticing was also in conformance with the City of Laguna Beach Municipal Code § 25.05.065 Public notice, as required by local and State law. (https://ecode360.com/42898407#42898704) <u>Past meetings related to the project:</u> March 23, 2023 - Initial project proposals presented to the Board of Education (BOE) May 2, 2023 - LBHS Community Open House June 6, 2023 - Joint meeting with Laguna Beach City Council June 27, 2023 - BOE Study Session on LBHS pool September 28, 2023 - BOE Study Session on existing and potential pool use August 2024 - A community meeting regarding the LBHS pool modernization brought together community groups, pool users, aquatics parents, and city staff to	

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	present updates on conceptual designs and gather additional feedback from stakeholders. October 10, 2024 - A community meeting regarding the design, engineering, and CEQA. <u>Future meetings:</u> March 20, 2025 - AB 52 and Board Meeting @ 6 p.m. Laguna Beach City Hall, 505 Forest Avenue, Laguna Beach. All information regarding the Facilities Master Plan update which includes Pool Modernization project is publicly available on the Laguna Beach Unified School District's website (https://www.lbusd.org/departments/facilities/projects)	
Comment D-4	I strongly encourage the LBUSD to reject the current proposal and instead pursue a smaller, more practical alternative (such as a 35- to 38-meter pool) that balances student-athlete needs with the interests of the broader community. Spending $25 million on an oversized aquatic facility for a school with declining enrollment is not a responsible or community-conscious decision. Improvements should be smart, sustainable, and responsive to the needs of all Laguna Beach residents—not just a select few.	
Response D-4	Despite declining school enrollments, there is an anticipated increase in community demand for the pool services, negating the concern of underutilization or as expressed, "*a bigger pool for fewer people.*" This comment is noted.	
E	**Larry Zeman**	**February 12, 2025**
Comment E-1	My name is Larry Zeman, and I have lived on Los Robles since 1994. I oppose the proposed LBUSD development and agree with all the points made by Sensible Laguna, which they state far better than I could. In sum, the LBUSD proposal would drop an enormous, outsized development in our nearly 100-year-old historic neighborhood that cannot come close to absorbing the scale and impact that would follow.	
Response E1	This comment is noted. Specific suggested impacts are in further comments and addressed below. Cultural Resources.	
Comment E-2	Our neighborhood is called El Mirador and El Bosque and was developed in 1928, nearly 100 years ago. As stated in the attached State of California Historical Resources Inventory listing, our neighborhood was created by the Yoch Family that helped found Laguna Beach (Hotel Laguna, etc.) and is "unlike any other in Laguna. It is the only neighborhood to be subdivided with a curvilinear street plan on a very gently sloping terrain."	
Response E-2	This comment is noted and character of the neighborhood acknowledged. Specific suggested impacts are in further comments, which are addressed below under Cultural Resources.	
Comment E-3	Toward that end, I'm attaching the following two documents:	

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	• State of California Historic Resources Inventory listing for our El Mirador and El Bosque neighborhood. The description details the uniqueness of our neighborhood as pictured in a street map including Short, Los Robles, El Bosque, Wilson, and Catalina streets along with LBHS that remain as-is through today. • The Yoch Family's original 1920s brochure offering lots in our neighborhood showing the same and surrounding streets noted in the Historical Resources Inventory listing. This layout and small scale of our neighborhood has not changed over the next 100 years and would be severely impacted by the LBUSD proposed development.	
Response E-3	This comment is noted. The Historic Resources Inventory was reviewed. The Cultural Resources Inventory report's analysis determined there would be no direct or visual effects on historic structures in the neighborhood.	
Comment E-4	Our historic neighborhood is characterized by its narrow curved streets and eclectic traffic patterns that include many stop signs, speed bumps and a roundabout, which are not designed to accommodate the impact of the school district's proposed development.	
Response E-4	Transportation. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. It should be noted that although the pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. This comment is noted.	
Comment E-5	Moreover, our main traffic arteries include Park and Legion, which are the only evacuation routes for us as well as many other residents and would be greatly impacted during and after the construction of LBUSD's proposed development.	
Response E-5	Transportation. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. It should be noted that although the pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. This comment is noted.	
Comment E-6	I understand that the LBUSD has not performed any traffic or other impact studies on how its proposed development will affect our historic neighborhood. Clearly, that needs to be done before the LBUSD takes any other action. If those studies were performed, the obvious conclusion would be reached that the LBUSD's proposed development should not proceed as planned. Please pass my comments in this email on to the appropriate decision makers. Thank you, Larry Zeman	

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Response E-6	Transportation. CEQA reviews for potential impacts when compared to the existing development. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. The pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA.	
F	**Chris Alonso**	**February 17, 2025**
Comment F-1	The document seems to dehumanize the considerable impact this will have local residents.	
Response F-1	The Initial Study/Mitigated Negative Declaration (MND) has been conducted in strict adherence to the 2024 California Environmental Quality Act (CEQA) Statutes and Guidelines, fulfilling all required notification protocols.	
Comment F-2	Construction Noise: the document outlines about 14 months of considerable noise, vibrations, and related construction effects. As a local resident home during the day (with a senior dog and 2 nervous cats) this is a major impact on our peace and wellbeing. And if the project is not on time, this could last for years.	
Response F-2	The analysis of construction noise and vibration, which has been expanded to include two new sensitive receivers north and northeast of the project site, concluded that exposures will be less than significant without additional mitigation.	
Comment F-3	Construction Parking - the document seems to ignore the impact of local residents on losing access to street parking during the construction period - this is where many local residents park.	
Response F-3	Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
Comment F-4	Noise & Lighting Impact of finished project - we have concerns about the increased noise and light pollution that seems likely from a project with increased capacity. I saw no reference or study for how the new lighting system will impact residents, their views, the ability to enjoy the evening sky, just "add 40 foot light poles". This seems to be minimizing the impact of the project, not genuinely trying to measure and assess the impacts to the local community.	
Response F-4	Noise: Please see Response F-2, above, regarding concern about noise impacts.	

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	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3-5 **Pool Lighting** of the IS/MND noting the 24'-0" height of the proposed lighting. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. The project would adhere to all applicable state codes and regulations for lighting and school facilities.	
G	**Laura Tarbox**	**February 19, 2025**
Comment G-1	I have lived in my home at 812 Manzanita for 16 years. I am right above the high school tennis courts, and adjacent to the pool. I am just sick to think of what will happen to my lovely neighborhood and quality of life if this project goes ahead at the currently proposed scale. This is a project that is not needed in a district and community of our size simply to benefit a relative few students.	
Response G-1	This comment is noted.	
Comment G-2	Notwithstanding the cost, overall environmental impact of increased water usage, lighting, and pollution from more traffic, and considerations of how funds might be better spent to benefit a larger number of students, I am obviously concerned about the direct impact on our properties that are immediately adjacent to the pool. It is disingenuous for anyone to say that usage and traffic will not increase with the increased size of the pool. Already, there is very little parking availability, lots of noise, and people pulling in and out of my driveway constantly to turn around. (A large planter with a cypress tree on the front side of my garage was recently left smashed on my driveway due to this activity, so I am looking into barriers or a gate across my driveway to stop people from using it in this manner.)	
Response G-2	Water use is reviewed in Section 4.10 Hydrology and Water Quality and Section 4.19, Utilities and Service Systems. As noted, the pool would require the water supply to initially fill and maintain adequate water levels. However, the amount of water used by the proposed project in the long term would result in a minor increase in the existing water use of Laguna Beach High School as a whole according to review standards outlined within the 2024 CEQA Statutes and Guidelines. Noise is reviewed in Section 4.13, Noise. The analysis includes simultaneous ambient noise measurements in the immediate pool area and at nearby sensitive receptors; calculation of offsite noise and vibration exposures during project construction; operating noise from onsite equipment, crowd noise, horns, etc.; and onroad noise from project-generated traffic. The project was reviewed using the most current guidelines prepared by the state noise officer as contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003 and	

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	reissued in 2017, the Noise Element of the City of Laguna Beach General Plan, and other criteria. Impacts were found to be less than significant under CEQA. Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 **Pool Lighting**, of the IS/MND noting the 24'-0" height of the proposed lighting. As noted, the project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours and reduce spillover illumination. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND. Transportation. CEQA reviews for potential impacts when compared to the existing development. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. The pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
Comment G-3	Much has already been written by impacted residents, but the lighting, decreased views, and increased noise and usage is untenable in this already tight space. Yes, I bought my home knowing I am next to these facilities, but I could not have imagined there would be anyone who would ever think there was room for expansion in this already small footprint. What I did not understand was the lack of recourse we have as residents and citizens, and I had thought our School Board would be more considerate of the neighbors and taxpayers in this community, especially when a compelling need case has not been made. It is insane tome that a few parents have been able to push this forward for their kids at the expense of other kids not playing water polo or swimming, as well as the local residents who will be impacted long after their kids are gone.	
Response G-3	This comment is noted.	
Comment G-4	Please consider going with a smaller, less expensive option, keep in mind impacted views, and look at adding noise and light mitigation as has been requested by other neighbors.	

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Response G-4	This comment is noted. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
H	**Patrick Stoner**	**February 16, 2025**
Comment H-1	The MND proposal is rife with errors and omissions and therefore misleading to the public. There is reference to appendices that do not exist in the body of the proposal. A new report needs to be revised and submitted. As a neighbor, my concerns are lighting, noise, traffic, emergency evacuation, and quality of life.	
Response H-1	Technical appendices are provided in separate files that are posted to the District website. Transportation. CEQA reviews for potential impacts when compared to the existing development. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. The pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA.	
Comment H-2	Lighting needs to have a height restriction and shielding.	
Response H-2	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40 foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 noting the 24'-0" height of the proposed lighting. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND. The project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations, which would be reviewed and approved by City staff to ensure that light and glare from project components would be less than significant.	
Comment H-3	Noise from activities in the pool are swimming and water polo, with the latter generating significantly higher noise levels. There is no mention of water polo in the body of the MND, only swimming. Additional noise will be generated from 270 potential spectators.	
Response H-3	Noise is reviewed in Section 4.13, Noise. The draft IS/MND inadvertently omitted the fact that the second set of poolside and community noise measurements took place during water polo activities. The discussion of the measurements on that day has been expanded to show a significant increase in pool area noise during water polo activities. The analysis includes calculation of offsite noise and vibration exposures during project construction; operating noise from onsite equipment, crowd noise, horns, etc.;	

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	and onroad noise from project-generated traffic. The project was reviewed using the most current guidelines prepared by the state noise officer as contained in the "General Plan Guidelines" issued by the Governor's Office of Planning and Research in 2003 and reissued in 2017, the Noise Element of the City of Laguna Beach General Plan, and other criteria. Impacts were found to be less than significant under CEQA.	
Comment H-4	In view of the LA fires, we must be vigilant concerning emergency evacuations. Park Avenue is the main artery from Top of the World, Thurston, and the Village Area. Construction traffic is a major impediment to an organized evacuation.	
Response H-4	Transportation. CEQA reviews for potential impacts when compared to the existing development. As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. The pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. Construction activities for the project may necessitate the temporary closure of either a single lane or an entire segment of a local roadway. In such instances, obtaining an encroachment permit from the City of Laguna Beach is mandatory. The City will evaluate all encroachment permit applications to ensure that the construction activities do not interfere with emergency response access to the project site or adjacent properties, and do not pose any traffic hazards. Adherence to all conditions (including construction traffic and traffic control) specified in an encroachment permit is essential for permit approval.	
Comment H-5	My last concern as well as most residents and visitors is parking. Where are 270 spectators going to park I an already congested neighborhood?	
Response H-5	The current capacity of the pool facility is 270 spectators; the new facility will have a similar capacity. Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
I	**Steve Brown**	**February 16, 2025**
Comment I-1	The comment period does not adequately comply with CEQA requirements: • The MND was published by LBUSD on January 17, 2025, per the mailing, but public notification was postmarked January 21 and arrived by January 23. This caused a cumulative 6-day delay or about 20% of the response time expected under CEQA. The public comment period per the documentation provided is from January 17 to February 17, 2025. • Care should be taken to ensure the public has had enough opportunity to review the materials and comment. To ensure adequate public review, consider revising	

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	and resubmitting the documents for comments.	
Response I-1	The USPS meter indicia on the postcard mailer displayed a date of January 21, all other forms of the notice were posted on January 17. Additionally, the January 21 date was still well within the statutory requirement of 7 days for public hearings.	
Comment I-2	Critical Appendix information is not included: • The document states, "Technical studies and other documents, which include supporting information or analyses used to prepare the IS/MND, are included in the following appendices," yet these are not provided. • This information is important as it is referenced multiple times throughout the document for technical support regarding mitigations and analysis. • Appendices are technical in nature and designed to support mitigations discussed, but they were not made available to the public at the start of the 30-day review period, thus the CEQA process is incomplete. It is challenging to determine the environmental impacts or benefits of mitigation measures without these appendices due to their significance to the document and project. • The missing appendices identified in the document are stated as follows: Appendix A1 Project Plans; Appendix A2 Estimated Construction Schedule; Appendix A3 Logistics Site Plan; Appendix B CalEEMod Input and Results for Air Quality Analysis; Appendix C Biological Resources Assessment; Appendix D Cultural Resources Assessment; Appendix E1 Geotechnical Report; Appendix E2Paleontological Records Search; Appendix F Environmental Radius Report; Appendix G Ambient Noise Measurement Data; Appendix H Limited VMT Analysis. • Please attach all exhibits and resend the entire document to the public once updated so that there view can be completed.	
Response I-2	Technical appendices are posted in a separate file on the District website. This comment is noted.	
Comment I-3	Document appears to incorporate significant erroneous information from unrelated consulting projects or other sources that are inapplicable to the Laguna Beach IS/MND: • Significant errors in the document suggest a possible "cut and paste" approach by the consultant, utilizing content from prior unrelated projects rather than focusing on the Pool Modernization Project in Laguna Beach. These errors should have been identified and corrected during district and other reviews but were not. • Due to the document's design, it is not clear to the public whether issues are confined to specific sections or if other areas, particularly those with technical content, pertain to the environmental impact area in question in Laguna Beach, elsewhere, or are from entirely different projects. • These inconsistencies are scattered throughout the document, leading to structural issues that raise questions about whether the public is reviewing information pertinent to the Laguna Beach project, another district project, or elements of both. The report should be thoroughly reviewed and revised. In its	

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	current form, multiple issues within the CEQA analysis would require mitigation if included.	
Response I-3	This comment is noted. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment I-4	Examples of such issues present throughout the document include such things as: • References to an airport and "nearby" schools that are located 80 miles or more inland and away from Laguna Beach. This has no relevance. • Other discrepancies also exist. For instance, the term "project" is contextually appropriate, but in other places, it shifts to "school," which is not correct for this project. This indicates content from another document was incorporated with unknown impact or relevance. Schools versus projects have different potential environmental impacts, so this must be clarified. • Beyond adding confusion, there are numerous references that could necessitate mitigation not considered in the document, potentially due to copy-paste errors or inadequate review.	
Response I-4	This comment is noted. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment I-5	Examples provided and many others not listed may have been copied from unrelated documents: • Mismatches in pool dimensions (50 meters vs 45 meters) • Multiple conflicting lighting specifications (40-foot poles more suited for a football field vs 24-footpoles similar to nearby tennis courts) • Planting plans involving trees that could obstruct views (after stating views are not obstructed) like the Mexican Fan Palm (100 feet maximum height), Marina Strawberry Tree (40 feet), Giant Bird of Paradise (30 feet) and Red Rocket Crape Myrtle (20 feet) • Intermingling shifting terms for the project (may have come from other sources or documents)such as aquatic center, aquatic facility, aquatic complex, and swimming pool • Given these issues, many references do not relate to the Laguna Beach project. Please revise and update the document comprehensively. Ensure all supporting documentation, exhibits, and appendices are accurate to prevent misleading the public. Once revisions are complete, reroute the entire document with attachments for public input. The current document lacks cohesion and does not support a reasonable public review related to CEQA; therefore, it should be corrected and resubmitted for review.	
Response I-5	The 50m x 45y size was from a previous submittal. The correct size is 45-meter x 25-yard pool, with 17 lanes in a north-south (25-yard) orientation. This has been corrected.	

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	Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment I-6	The document does not address the unique environmental impact of water polo: • The project description does not specifically mention that the proposed aquatic center will be heavily used by water polo teams and is designed to host CIF events. • The document states that "the facility improvements may increase the public's use of the pool area and may also attract more visitors during swim meets." However, it does not address any potential impact related to water polo. This could be a significant environmental impact that has not been included in the analysis. • Throughout the planning process for a new aquatic center and addressing the needs of aquatics athletes and city usage (including water polo clubs), the District and School Board have frequently stated that the increased size of the pool and design are primarily needed to support water polo. • The sport of water polo has several potential environmental factors (noise, lighting, traffic, etc.)that should be addressed under CEQA. These elements need to be incorporated into the document and properly analyzed. • For example, water polo generates more noise than swimming, with frequent referee whistles and horns. A typical water polo game whistle (Fox 40) can reach a sound level of 115 decibels, which is very loud and audible even in a noisy pool environment. • Bodet Sport, a manufacturer of water polo scoreboards, indicates that integrated horns of 90 decibels are built into its systems and used to announce stoppages of play. • According to the American Speech Hearing Association, humans can listen to sounds at 70 decibels or less for as long as desired. Sounds at 85 decibels can lead to hearing loss if listened to for more than 8 hours. Sounds over 85 decibels can damage hearing more quickly, cutting safe listening time in half for every 3-decibel rise over 85. For instance, humans can listen to 88-decibelsounds for 4 hours and 91-decibel sounds for only 2 hours. • A 115-decibel sound, such as the water polo whistle, exceeds the "average human pain threshold" of 110 decibels according to Purdue University. This information should be incorporated into the document, and mitigations should be provided. • The document measures noise levels at various points around the pool specifically when lap swimming is occurring and not during water polo practices, games, or tournaments. Measuring noise • during periods of lap swimming does not accurately reflect the impact of CEQA on water polo games and tournaments. More rigorous sound testing should be conducted in other areas around Manzanita and beyond the tennis courts.	
Response I-6	The second session of ambient noise measurements (on November 15, 2024) actually did occur while water polo-related activities were underway. The noise measurement technician noted:	

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	• Music in the background playing with a large speaker. • Water polo team practice in session. • Claps from an audience. • Loud cheers, whistle blowing, coach/referee yelling. • Team yelling, water splashing, loud horn. This description was inadvertently omitted from the IS/MND. It has been added. In addition, we have now estimated the increases in poolside noise between swimming and water polo activities. We have also expanded the analysis of operational noise emissions to include an increased number of simultaneous water polo matches. In regard to the noise levels of the shot clock horns and other equipment used at water polo matches, yes, they are very high and potentially damaging to one's hearing. However, the noise levels stated by manufacturers are typically measured at one meter from the horn or other device. For example, if you have six blasts of a 110-dB horn every 15 minutes, the average noise exposure at 50 feet would be about 65 dBA. The exposure at local residences would be considerably lower.	
Comment I-7	The impacts of sound, light, usage, and noise have not been fully analyzed under CEQA. • The document mentions that usage should not increase materially; however, projections in the same document indicate that energy demand will be 64% higher and solid waste generation will increase by 47%. These metrics suggest increased activity and significantly more people using the facility than currently observed. This requires further analysis and appropriate mitigation for sound, noise, traffic, and light issues. • Previous documentation and presentations to the public indicate that this design primarily supports increased water polo activities, including high school, club, and other events. That documentation and statements by administration and board members have indicated the primary driver for the larger pool need relates to the significant growth in this sport so expansion is necessary to accommodate it. • It has also been indicated that the high school men's team plays its games at other pools due to the current pool's limitations, and a new pool would support bringing these games back to the area. • These factors increase activity in the pool space, boost noise levels, and impact other environmental factors that should be addressed in the document. • Claiming there is no change contradicts your prior statements and is inaccurate. This section should be reviewed and updated accordingly to incorporate and reflect these considerations, with further mitigations (such as replacing fencing with a sound attenuating solid wall on the tennis courtside of the pool similar to the design over the new stadium seating, adjusting the height of light poles, etc.) to address CEQA-related issues. • Sound attenuation walls are needed around all sides of the pool to block noise.	
Response I-7	This comment is noted. Additional analyses have been conducted to take any usage increases and applicable environmental factors into consideration, as shown in the	

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	following responses herein. The conclusions of the additional analysis indicate that impacts will still be less than significant.	
Comment I-8	The lighting environment analysis under CEQA is incomplete: • The document overlooks potential light leakage from a larger scoreboard, despite CIF requirements related to bigger pool sizes and audience viewing capability. • There is no mention of automatic light shut off or operating hours, seen in similarly close residential proximity as 8 am to 8pm.	
Response I-8	This comment is noted. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment I-9	Key factors have been omitted that are important elements under CEQA: While swimming is mentioned 42 times, polo, water polo, tournaments, and team usage times are omitted. These aspects are typically included in similar CEQA analyses and discussed in reports from other schools to mitigate environmental impacts and should be included for proper analysis.	
Response I-9	The second session of ambient noise measurements (on November 15, 2024) actually did occur while water polo-related activities were underway. The noise measurement technician noted: • Music in the background playing with a large speaker. • Water polo team practice in session. • Claps from an audience. • Loud cheers, whistle blowing, coach/referee yelling. • Team yelling, water splashing, loud horn. This description was inadvertently omitted from the IS/MND. It has been added. In addition, we have now estimated the increases in poolside noise between swimming and water polo activities. We have also expanded the analysis of operational noise emissions to include the effect of increasing the number of pool lanes by 60 percent, and noise from a water polo match. For the initial calculations, intervening walls and house were not taken into account. At one sensitive receiver, exposures would exceed CEQA criteria. However, when an existing intervening wall is taken into account, the noise level at that receiver would also be less than significant. When intervening walls for all the other sensitive receivers are evaluated, results for all the other sensitive receivers would be lower.	
Comment I-10	Project Location is indicated as 625 Park Avenue, but it should be 670 Park Avenue. The school administration building is at 625 Park Avenue, while the current pool is at 670 Park Avenue, where the new pool is also expected to be located. It is important to clarify this, as the CEQA impact has been assessed for 670 Park Avenue,	
Response I-10	The address has been verified; “625” is the high school address, “670” is the project site address.	

Letter	Agency, Organization, or Individual	Date
Comment I-11	Proposed project is surrounded by residential structures • While CEQA does not have a set distance in feet from a project that it covers, as its scope is determined by the potential environmental impact of the project, not just its proximity certain standards are used. • When notifying property owners, local jurisdictions often use a range of 300-500 feet from the project site to ensure adequate public awareness. The District reported it used 500 feet for this. • Simple analysis using Google Earth finds there are at least 74 homes surrounding the proposed pool area from edge of pool that are as little as 35 feet up to 500 feet away (plus 2 schools of Anneliese + the high school campus; 1 hotel with 5 rooms and 1 church). • This should be updated to indicate the project is surrounded by residential structures on ALLSIDES EXCEPT for the area along Park where the high school sits. • Total area impacted includes homes on Virginia Park, Griffith, St Anns, Manzanita, Park, Skyline and La Vista (plus the schools, hotel, and church). The document should be updated to include those areas and sound, light, and traffic mitigated further.	
Response I-11	The Initial Study/Mitigated Negative Declaration (MND) has been conducted in strict adherence to the 2024 California Environmental Quality Act (CEQA) Statutes and Guidelines, fulfilling all required notification protocols. A Notice of Intent (NOI) for the project was published in the Orange County Register on January 17, 2024. Concurrently, notifications were mailed via USPS to all residential and commercial property owners within a 500-foot radius of the project site, consistent with CEQA regulations. Public noticing was conducted in conformance with all applicable state and local statutory requirements for public noticing and review of MNDs, pursuant to Section 15072 and Section 15073 of the State CEQA Guidelines.	
Comment I-12	Lighting - Light poles are discussed as being either 24 feet or 40 feet tall. • The environmental impact from lighting needs clarification based on pole height and design. The taller height (40 feet) is more akin to what one would expect surrounding a football field, while the smaller height (24 feet) are more similar to what currently exists on neighboring tennis courts. • Depending on the height and design of these, the environmental impact from light is unknown until that is clarified and cleaned up in the document.	
Response I-12	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24'-0" in height). Figure 3.3-3 delineated 40-foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and **Section 3.3.5 Pool Lighting** of the IS/MND noting the 24'-0" height of the proposed lighting.	

Letter	Agency, Organization, or Individual	Date
	Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment I-13	Pool Size / Increased Usage - Size goes from 25 meters to 45 meters, an 80% increase. • The increased size will support simultaneous multiple practices and CIF-sponsored events, resulting in more people, traffic, and noise. • These impacts need to be addressed properly in the document and rerouted for additional public input.	
Response I-13	This comment is noted.	
Comment I-14	Traffic and Wildfires – Recent fires in LA highlight the importance of traffic and wildfire mitigation, especially since Park Avenue is a major evacuation route near schools. • Traffic flow and timing during the day need better addressing. • Police presence for active traffic control is necessary. • The movement of dump trucks between classes adds risk and should be mitigated.	
Response I-14	As discussed in Section 4.17, the typical daily operations of the modernized pool are expected to generally remain the same after the remodel, the project is not expected to generate more than 110 new daily trips. It should be noted that although the pool facility can be utilized to host local and regional swim meets, these conditions would be considered special events and would therefore not impact the average number of daily trips. Since the project is expected to generate fewer than 110 new trips per day, it can be assumed that the project has a less than significant impact on VMT under CEQA. Construction activities for the project may necessitate the temporary closure of either a single lane or an entire segment of a local roadway. In such instances, obtaining an encroachment permit from the City of Laguna Beach is mandatory. The City will evaluate all encroachment permit applications to ensure that the construction activities do not interfere with emergency response access to the project site or adjacent properties, and do not pose any traffic hazards. Adherence to all conditions (including construction traffic and traffic control) specified in an encroachment permit is essential for permit approval.	
Comment I-15	Analysis of Critical Evacuation Route on Park Avenue is Incomplete • Park Avenue is crucial for evacuations, requiring police presence during construction for safety. Mitigation plans need to address these concerns.	
Response I-15	As detailed in Section 4.17, construction activities for the project may necessitate the temporary closure of either a single lane or an entire segment of a local roadway. In such instances, obtaining an encroachment permit from the City of Laguna Beach is mandatory. The City will evaluate all encroachment permit applications to ensure that the construction activities do not interfere with emergency response access to the project site or adjacent properties, and do not pose any traffic hazards. Adherence to	

Letter	Agency, Organization, or Individual	Date
	all conditions (including construction traffic and traffic control) specified in an encroachment permit is essential for permit approval.	
Comment I-16	Hazardous Chemical Analysis Is Incomplete • Roughly doubling the amount of acid and chlorine tanks on site given 80% increase in pool size should be reanalyzed and mitigated. • Chemicals on hand are within 15 feet of a home and around kids at the school • This should be better identified, addressed, and mitigated	
Response I-16	The Hazards and Hazardous Materials section has been revised to address pool chemicals. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
J	**Steve McIntosh**	**Undated**
Comment J-1	The following are observations of statements, actions, data, and proposed mitigations contained in the document. Addressing some of the findings, in no particular order. (Aesthetics, Hazards and Hazardous Materials, Noise)	
Response J-1	This comment is noted. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment J-2	There are currently 17 parking spaces and 2 ADA Spaces. This is actually a 60% reduction in standard parking spaces and a 50% reduction in ADA Parking Spaces.	
Response J-2	Parking considerations are not addressed under CEQA unless a project proposes to exceed the parking requirements set forth by the relevant local jurisdiction's code. In this context, the City of Laguna Beach is responsible for determining the number of parking spaces required both during the construction phase and for the final project.	
Comment J-3	The statements pertaining to light, reflection / glare are unsubstantiated, as there appear to be no tests, or measurements showing data to support.	
Response J-3	This comment is noted. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment J-4	This is conflicting information as the Proposed Plan Drawing Figure 3.3-3 calls out for 40' lights X 4. This contradicts Figure 3.3-9, the Project Comparison View, where Solar Panels are not shown.	
Response J-4	Lighting is reviewed in Section 4.1. Aesthetics. The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes (approximately 24 feet high).	

Letter	Agency, Organization, or Individual	Date
	Figure 3.3-3 delineated 40 foot light poles which was an exhibit from a previous submittal. Figure 3.3-3 has been updated with most current site plan and text has been added to Figure 3.3-9 and Section 3.3.5 **Pool Lighting** of the IS/MND noting the 24-foot height of the proposed lighting. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. The project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations, which would be reviewed and approved by City staff to ensure that light and glare from project components would be less than significant.	
Comment J-5	While the District states it will adhere to the City of Laguna Beach's "Good Neighbor Lighting Policy," The district's current action pertaining to lighting is not following the City Policy. See the photos below. The District Sign at the corner of Legion, Park & Short St. that is illuminated 24-7. Years ago, this sign would shut off at 7 – 8:00 PM. After being updated several years ago with extra bright LEDs, the cut off time was eliminated. The district has ignored requests to remedy the situation. The light is very disruptive to a sleepy residential area and against the City Sign Ordinance and the City Good Neighbor Lighting Policy.	
Response J-5	This comment is noted. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. Additionally, the proposed project will incorporate the most current available technology to minimize glare and light spillage. Additionally, timers or other control mechanisms would be implemented to regulate lighting hours to reduce spillover illumination.	
Comment J-6	Tennis court lighting continues to be illuminated long after players have left courts. Many times, after 10:30 PM, despite several mentions and requests to change how the lights operate. When the pool was moved into the current space from the school quad, the neighbors were promised no and low lighting, sound mitigation / restrictions, and early stops to practices and events. None of which have been followed or recognized. These reasons, combined with the inconsistencies in the Mitigation document, bring a general distrust of the process. There are many residents over the age of 65 years within the proximity of the pool project. This needs to be taken into consideration. Many of the above mentioned "Sensitive Receptors" over 65 years are downwind and could be adversely affected by fugitive dust and toxins. At this point, it is my understanding that the City and the District do not have an agreement in place for future use just yet and certainly not in January 2025.	
Response J-6	This comment is noted. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	

Letter	Agency, Organization, or Individual	Date
	The community's desire for sound mitigation is, however, noted and will be forwarded to the decision-makers to be considered as part of the project.	
Comment J-7	It seems that the above statement is only applicable to the construction aspects pertaining to hazardous materials and chemicals. There is no mention of the typical chemicals used in pool operations and maintenance. Typical hazardous materials used include chlorine, perlite, and muriatic acid. There is no mention how the transportation and handling of these materials would mitigate any potential hazard.	
Response J-7	The Hazards and Hazardous Materials section has been revised to address pool chemicals and storage. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	
Comment J-8	Again, no mention of the "Operation" of the pool and any details pertaining to the mitigation of potential accidents. No description of what quantity of the chemicals will be stored on site and how. Capacity of tanks to hold the chemicals and no description of the process should there be a Chemical spill within the pump room, etc. This school is nowhere near Laguna Beach. Obviously, a cutting and pasting of information. Annalise Pre-School is 1 block away and of course the pool is being built on LBHS property. While Operations are mentioned, the actual pool chemicals are not. Again, no information on storage, etc.	
Response J-8	The Hazards and Hazardous Materials section has been revised to address pool chemicals and storage. Errata have been prepared as part of the RTC addressing this error. However, the correction does not change the conclusions of the IS/MND.	
Comment J-9	The Cortese sites noted above are not within .5 Miles of the project site. French Valley Airport is in Riverside County. Another example of cutting a pasting information. The project is not under the water quality control plan of the San Diego Regional Water Quality Control Board. It is unrealistic to not include several more locations that are in direct line of sound under "Sensitive Noise Receivers." This list must be expanded to get an actual accurate measurement of sound in affected areas.	
Response J-9	The Cortese sites, Airport analysis and Water Quality Control Board errors have been corrected. For both the construction and operational noise analyses, two additional noise receivers were added. They are north and northeast of the tennis courts. Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND.	

Letter	Agency, Organization, or Individual	Date
Comment J-10	The "noise sampling" taken on the two separate days are vastly incomplete. They were taken during swim times only and apparently with mostly lap swimming. NO High School water polo, NO youth programs, or actual High School swim meets or Water Polo games. This is a check the box move in order to skew the results to lower sound readings. Not a complete examination of one of the most critical mitigations for this entire project. The "samplings" were taken from some very non-direct locations. One on the opposite side of elevated homes some 30' below the foundation level of the houses. Others a distance again much lower than the pool and not in line of sound. Again, this appears to be a suspect action to not obtain true, pertinent, and accurate results. First off, leaf blowers are illegal in Laguna Beach. Secondly, the above statement is false and an attempt to alter the impact of this pool expansion. As stated, the sound readings were not complete and did not measure the complete use of the current pool.	
Response J-10	The descriptions of activities at the pool during the November 15, 2024, sampling inadvertently did not mention that water polo activities were also observed. The noise measurement technician did mention: • Music in the background playing with a large speaker • Water polo team practice in session • Claps from audience • Loud cheers, whistle blowing, coach/referee yelling • Team yelling, water splashing, loud horn A new analysis of the poolside noise measurement data indicates that the average noise levels during water polo activities are 11.1 dBA L_{eq} higher than during just swimming. Estimation of noise impacts from a water polo match was added to the operational noise analysis. Section 4.13 of the IS/MND has been revised to include this information. Nonetheless, the noise impact conclusions of the IS/MND remain the same.	
Comment J-11	Nowhere in this document is Water Polo mentioned. That is the single most promoted reason for the expansion of this pool in countless meetings and documents. The need for a three team practice was shown below, which will bring two additional teams to the pool at the same time. District supplied image promoting 3 concurrent Water Polo Practices In fact, the increased number of attendees in the pool has been promoted from the start. • Three concurrent Water Polo practices will be in the pool as it's been claimed only one team can practice at a time now. • Expanded use by the Cross Country Team	

Letter	Agency, Organization, or Individual	Date
	• Expanded use by the Track Team • Expanded use by the Baseball Team • Expanded use by the Soccer Team • Expanded use by U 12 Girls Water Polo • Expanded use by U 18 Girls Water Polo The statement that use will not increase is absolutely incorrect. Data and information from district say just the opposite.	
Response J-11	The descriptions of activities at the pool during the November 15, 2024, sampling inadvertently did not mention that water polo activities were also observed. The noise measurement technician did mention: • Music in the background playing with a large speaker • Water polo team practice in session • Claps from audience • Loud cheers, whistle blowing, coach/referee yelling • Team yelling, water splashing, loud horn A new analysis of the poolside noise measurement data indicates that the average noise levels during water polo activities are 11.1 dBA L_{eq} higher than during just swimming. Estimation of noise impacts from a water polo match were added to the operational noise analysis. Section 4.13 of the IS/MND has been revised to include this information. Nonetheless, the noise impact conclusions of the IS/MND remain the same.	
Comment J-12	SOUND MITIGATION Sound mitigation has been stated and discussed many times including at the CEQA process overview. Including the following: Unapproved Audio Prohibit Airhorns Boisterous activity on exit Foot stomping on bleachers In addition, there were examples of Noise Attenuation Walls. None of these were discussed in the document. This is a very important mitigant that needs to be added to the plan.	
Response J-12	The descriptions of activities at the pool during the November 15, 2024, sampling inadvertently did not mention that water polo activities were also observed. The noise measurement technician did mention: • Music in the background playing with a large speaker • Water polo team practice in session	

Letter	Agency, Organization, or Individual	Date
	• Claps from audience • Loud cheers, whistle blowing, coach/referee yelling • Team yelling, water splashing, loud horn A new analysis of the poolside noise measurement data indicates that the average noise levels during water polo activities are 11.1 dBA L_{eq} higher than during just swimming. Estimation of noise impacts from a water polo match were added to the operational noise analysis. Section 4.13 of the IS/MND has been revised to include this information. However, the conclusions of the IS/MND remain the same. The community's desire for sound mitigation is, however, noted and will be forwarded to the decision-makers to be considered as part of the project.	
Comment J-13	TRAFFIC SAFETY Morning and afternoon traffic around the High School is slow moving on a daily basis. Adding this construction without better planning will cause unbearable gridlock and cause safety issues. Student walking and driving safety will be challenging and dangerous. In addition, traffic will cause a very dangerous emergency escape route problem. Park Avenue is one of the major escape routes from Top Of The World.	
Response J-13	As detailed in Section 4.17, construction activities for the project may necessitate the temporary closure of either a single lane or an entire segment of a local roadway. In such instances, obtaining an encroachment permit from the City of Laguna Beach is mandatory. The City will evaluate all encroachment permit applications to ensure that the construction activities do not interfere with emergency response access to the project site or adjacent properties, and do not pose any traffic hazards. Adherence to all conditions (including construction traffic and traffic control) specified in an encroachment permit is essential for permit approval.	
Comment J-14	Mitigated Negative Declaration Document Challenges This document is riddled with what seems to be incomplete studies and data. There are several mistakes and use of cut and paste in several areas which does not instill confidence in the validity of the content. There are several Appendix called out but were not attached or found.	
Response J-14	Errata have been prepared as part of the RTC to address this error. However, the correction does not change the conclusions of the IS/MND. Technical appendices are posted in a separate file on the District website. This comment is noted.	
Comment J-15	The Postcard announcing the NOTICE OF INTENT TO ADOPT, was postmarked on 1/21/25. On that card it states that 1/17/25 is the start of the time to respond. Mailing the card out 4 days after the start is not good. Again, another question of the authenticity of the process.	

Letter	Agency, Organization, or Individual	Date
	I believe that with the lack information, the mistakes, missing details and the poor timing of the notification card, this process needs a correction and a restart.	
Response J-15	The USPS meter indicia on the postcard mailer displayed a date of January 21. All other forms of the notice were posted on January 17. Additionally, the January 21 date was still well within the statutory requirement of 7 days for public hearings. It is noted that Public noticing for the IS/MND was conducted in conformance with all applicable state and local statutory requirements for public noticing and review of MNDs, pursuant to Section 15072 and Section 15073 of the State CEQA Guideline	
K	**Ann Gamerl**	**February 14, 2025**
Comment K-1	We have many questions regarding the above subject and hope that you can help us understand some of what is in the proposed document. It appears that there are some fundamental flaws and inconsistencies that we'd like to have addressed. For example, The project is listed at both 625 and 670 Park Ave. The description of surrounding structures omits the residences to the north. The pool dimensions are conflicting, the reduction in parking stalls - is it 7 or 5? not to mention the egregious error of referring to the school as Centennial High School, instead of Laguna Beach High School, which suggests a lack of diligence and thoroughness of the entire study. I would like to see these concerns addressed along with the Energy use mitigation, Water use, Noise pollution and parking.	
Response K-1	It is noted that the Draft IS/MND that was circulated for public review had some errors. The CEQA statutes and Guidelines allow errors to be corrected, and additional analysis conducted as part of the responses to comments on the Final IS/MND document prior to adoption. In accordance with CEQA requirements, all comments received during the public review period (including noise, water energy use and parking) have been fully responded to, and an Errata has been included in the Final IS/MND that provides correction to all errors noted. The errors noted by the commenting party have been corrected and included in the Errata. However, the conclusions of the IS/MND remain the same.	
L	**Patricia Halman-Menne**	**February 14, 2025**
Comment L-1	I strongly OBJECT to the proposed LBUS Modernization Project: 1. Too Aggressive of a plan - This program is far too dense for the existing site in question. 2. Increased Noise Impacts will be a negative influence for the immediate surrounding residential neighborhood, including the adjacent hilly neighborhood 1/8 -1/4 mile away as the noise will be amplified up the hill. 3. Loss of Real Estate Asset Values (approx. millions of dollars) to all the residential properties within the immediate Park Ave location and surrounding 1000 foot radius of properties. Due to increased Noise, traffic and congestion impacts.	

Letter	Agency, Organization, or Individual	Date
	4. Declining student population - does not warrant this increased size of the pool area - especially for the less than 100 students that are in the aquatics programs.	
Response L-1	1. Comment noted and will be provided to the decision-makers to consider. 2. Noise is reviewed under **Section 4.13 of the IS/MND**. Per the analysis, which took into consideration potential impacts to surrounding residential neighborhood, impacts under noise will be less than significant. 3. The IS/MND has been prepared in strict compliance with the requirements of CEQA. The analysis, which included potential noise, and traffic impacts, concluded that impacts would be less than significant. The CEQA analysis did not consider real estate values. Nonetheless, the comment regarding real estate values is noted and will be provided to the decision-makers for consideration. 4. This comment is noted and will be provided to the decision-makers for consideration.	

Comment Letter A

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 28, 2025

Elia Wahlstrom Rogers
Administrative Assistant
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92551
ewahlstromrogers@lbusd.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION DATED JANUARY 17, 2025, STATE CLEARINGHOUSE NUMBER 2025010571

Dear Elia Wahlstrom Rogers,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Laguna Beach High School Pool Modernization (Project). The Project will include demolition, excavation, grading, drainage, and building construction to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building. After reviewing the project, DTSC recommends and requests consideration of the following comments: A-1

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), §17210, §17213.1, and §17213.2, unless otherwise specifically exempted under section §17268. If the district is not using CDE A-2

State funds for the project, or is otherwise specifically exempt under section §17268, DTSC recommends the district continue to investigate, clean up the Site under the oversight of Orange County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the Office of Public-School Construction webpage.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

A-2

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.

A-3

3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

A-4

DTSC appreciates the opportunity to comment on the MND for the Laguna Beach High School Pool Modernization If you would like to proceed with DTSC's school environmental review process, please visit DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via CEQA Review email for additional guidance.

A-5

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation

State Clearinghouse

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Betsy Lindsay

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Comment Letter B

Response to:
LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION
Initial Study and Mitigated Negative Declaration (IS/MND)

The Laguna Beach Unified School District (LBUSD) mailed a postcard with a publication date of January 17, 2025, although it was not postmarked until January 21. The postcard date started a clock with the California Environmental Quality Act (CEQA) setting a deadline of February 17, 2025 for residents' comments, questions, and concerns. However, the IS/MND (available at https://www.lbusd.org/departments/facilities/bids-and-public-notices) for the LBUSD is incomplete (it says so in the report), riddled with errors, inadequacies and deceptions. Details matter. The IS/MND should be rejected on its face. B-1

Page 1 lists the project location as 625 Park Avenue, but on page 1-1 the site is 670 Park Avenue. "The proposed project is surrounded by residential structures to the west, south [sic] and east." What about north?

Proposed Construction

"The pool currently has ten 25-yard lap lanes with an attached shallow kids' pool." (page 1) to be replaced by 45-meter swimming pool (page 1). The *25-meter* x 25-yard pool is to be replaced by a "45-meter x 25-yard pool, with 16 lanes in a north-south [sic] (25-yard) orientation." (page 1-1) **This nearly doubles pool size**. B-2

The equipment/storage building will be replaced with a **larger two-story** 6,692 square-foot structure with an additional 554 square-foot public restroom and shower building. These will encroach on the parking lot reducing the 17 stalls to 7 according to page 1-1 but to 5 according to Figure 3.3-3 PROPOSED SITE PLAN.

Neighborhood Impacts

These proposals can reasonably be assumed to change the neighborhood environment. The Lead Agency (LBUSD) has the responsibility to identify these impacts and to identify mitigation measures to avoid environmental impact. The mitigation measures should be specially spelled out. Neither the Identification of adverse effects nor the proposed mitigation of identified adverse effects in the IS/MND is adequate.

High-sensitivity land uses include residences and religious institutions, both of which surround the proposed project. Table 2.2-1 states that to the east of project are the LBHS Tennis Courts. But just above and to the east of the tennis courts are single family residences, as can be seen in Figure 2.1-2. Figure 2.2-2 PHOTOS 1 and 2 are deceptive, not showing these highly impacted single family residences.

The project would have substantial adverse environmental impacts on energy use, water use, noise, lighting, views, aesthetics, and parking. B-3

Transparency is the key. Transparency on the pool project has been lacking since the get-go. The project was "hidden under a bushel basket" and only after word leaked out and the community was aroused did the school board hold an "Open House" in May 2023 to present plans to the community. In fact, the lack of transparency and the deaf ears of the LBUSD led to a change in the LBUSD board. However, the old board voted to approve the project October 10, 2024 before the November 2024 election and before the newly constituted board could review the project. Then the incomplete IS/MND was mailed.

ENERGY USE – The increased size of the pool and support buildings will result in a net increase in use of electricity (for lighting, building cooling, and water distribution) and natural gas (for building and swimming pool heating). The larger than necessary pool and support buildings will result in wasteful or unnecessary consumption of energy. A smaller pool would require smaller mechanical accessories. The IS/MND states "The proposed project includes "the installation of … unknown utility…" (page 3-15) How can one comment on an unknown? Higher energy use increases utility costs and may contribute to global climate change. B-4

WATER USE – The proposed 45-meter pool would hold 377,500 gallons of water (page 4.19-3), requiring 80% more fill-water than the current pool with a corresponding increase in evaporation, requiring even more water. Laguna is an arid region requiring imported water (with its ever-increasing cost) and where water-wise use is the B-5

aim of Laguna Beach County Water District. The LBUSD should also be water-wise. And this isn't "Centennial High School" as referred to on page 4.19-2. The IS/MND document is a sloppy cut and paste document. B-5

NOISE - The high-sensitive land uses around the project include the single-family neighborhoods directly north, west, east, and northeast and The Church of Jesus Christ of Latter-day Saints to the west. Noise samplings were conducted on only two days (November 6, 2024 6:13-7:45 am and November 15, 2024 3:39-5:19 pm). Samples should have been taken as well during active water polo matches with shot clocks and amplified sound. Water polo shot clocks can have a sound level of up to 120 decibels (dB). Examples of other 120 dB sounds include jet engine, ambulance siren, chain saw, rock concert, and thunderclap, The World Health Organization and the U.S. Environmental Protection Agency recommend keeping environmental noise levels below 70 dB. Because the decibel scale is logarithmic, not linear, each 10 dB increase represents a 10-fold increase in sound intensity. For example, a 10 dB sound is 10 times more powerful than 0 dB, but a 70 dB sound is 10,000,000 times louder.

Additionally, noise levels should have been measured at houses above the tennis courts which are in a direct line for noise and light pollution. The IS/MND assumes the local noise ordinances will be enforced and places the onus on the offended to file a complaint. Rather amplified sound should be banned and dB level of water polo clock should be minimized. Amplified sound from the football/track stadium continues to be a problem. Additional noise would come from the operation of mechanical equipment (e.g., air conditioners, pumps). B-6

LIGHTING - The proposal claims the project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations. However, 40-ft sport lighting is equivalent to a 4- story building and is nearly twice the height street lights on Park Avenue. The neighborhood paid to underground their utilities, now four poles are to project into views. Outdoor lighting can create (1) excessive glare which is annoying and can causing safety problems, (2) light trespass which can reduce a sense of privacy, and (3) light pollution which decreases ability to see the natural night sky. How many stars can you see at night? The school neighborhoods fought this battle once, when lights were installed on the baseball field but which were finally removed. Now we live with the football/track stadium lights. B-7

VIEWS - All existing planters in the current facility will be demolished and new vegetation installed. Figure 3.3-10 POOL CONCEPTUAL PLANTING PLAN shows the proposed replacement vegetation palette, but no specific placement plans are presented. The tall trees included in the planting plan are inappropriate for view preservation (*Washingtonia robusta, Strelitzia nicolia*). Additionally, the "Tiki torch" palms are considered a fire hazard and are inappropriate near structures and areas prone to wildfire, as indeed this area is. The 4-story sport lighting projects way over the area and into the view shed as do the closely spaced palm trees on Park Avenue installed by the school. B-8

AESTHETICS – The IS/MND ironically states that the current pool facility was designed by preservationist architect Milford Wayne Donaldson. He kept the historic 1936 WPA pool building (originally classrooms) in his design. The physical demolition of this historically significant building is a substantial adverse change. With the new configuration the setback from Park Ave is non-existent for the indoor showers and not much larger for the pump room building. B-9

PARKING - The larger two-story locker/equipment building will extend into the current parking lot and reduce the number of stalls from 17 to 5. Figure 3.3-1 of the EXISTING SITE PLAN shows that all parking spaces in the parking lot and surrounding streets are already filled to capacity. And Manzanita Drive is NOT "a two-lane roadway with sidewalks on both sides" (page 4.17-2 to 4.17-3). The only sidewalk on Manzanita is in front of the pool parking lot.

The environmental factors mentioned above would be affected by this project. To many these are great and important changes worthy of attention. B-10

LBHS is the smallest public high school in Orange County. The 2023 census was 888 with a projected 2026 census of 750 (page 3-1), a 16% decrease. And with an expected decrease in the future (page 4.3-9). The 2023 Laguna Beach census was 22,332, a decrease from 2020. Despite decreasing city and school populations, LBUSD has proposed a larger "aquatic center", not just a bigger pool for fewer people. More organized events are likely at the proposed pool as has happened at the football/track stadium and will attract more attendees as

well as visitors with additional noise and traffic. A 45-meter pool is not needed for CIF high school swimming or water polo. A 35- to 40-meter pool meets the original objectives set out by the board. It addresses the ideal configuration for CIF water polo, supports multiple team practices, and expands the number of swim lanes. It is a common size for high schools. It is cheaper to construct and operationally more efficient. The neighborhoods surrounding the pool are 10x closer to the pool (3 abut the pool) than the average. As a result, the negative impact is significantly greater. An analysis of a 35- to 40-meter pool in the existing footprint with the option of retaining the existing buildings should be adequately and accurately explored by the school board before a decision is made. This is a 24/7 issue for the neighborhood; people live here.

Energy Use: Increased.
Water Use: Increased
Light Pollution: Increased
Noise Pollution: Increased
Views: Impacted
Aesthetics: Demolished
Parking: Decreased

B-10

JUST BECAUSE YOU CAN DOESN'T MEAN YOU SHOULD.
JUST BECAUSE YOU DON'T HAVE TO DOESN'T MEAN YOU SHOULDN'T (follow city rules).

Submitted January 10, 2025

Annlia and Merton Hill

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

CEQA Comments

Comment Letter C

1 message

Gary Kasik <garykasik@gmail.com> Thu, Feb 13, 2025 at 12:36 PM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

Thank you for the opportunity to comment on the IS/MND per the 1/17/2025 notice. My comments are offered to improve the document to avoid unnecessary delays as well as to point out certain concerns that can be addressed prior to the scheduled hearing. Always willing to discuss in detail if that helps get an improved presentation for the hearing.

GENERAL OBSERVATIONS

The impact assessment is minimized by representing the project as "replacement" and "modernization" with little to no recognition of the substantial size increases, a three times increase in density of use, and more than doubling spectator capacity. To properly assess before/after impacts it would be helpful to include BEFORE dimensions when referring to the new plans for:

1. Buildings (Sq ft)
2. Deck space
3. Seating Capacity and Orientation
4. Lighting type, quantity, and orientation

Operational plans presented by the district envision three concurrent waterpolo (WP) practices versus one today. Swimming practice common standards presented by the district reference 7-8 swimmers per lane so with eight lanes being added that provides the potential of over 50 additional concurrent swimmers. I saw no reference to existing spectator capacity but from photos I estimated +/-100 with that more than doubling to 272; as well as changing the orientation of the seating from north facing to east facing. C-1

There are multiple references that contradict planned use as presented by the district in prior meetings. While staying mostly inside the existing footprint with similar uses, it's important to represent density and capacity changes. Examples of misleading descriptions include:
"Since this is a pool replacement project, frequency of use, number of attendees, and additional sounds associated with water recreation are not expected to change"
"The use of the modernized pool is expected to remain relatively the same as that of the existing facility."
"The project is not expected to result in an increase to average daily traffic…"
And given a primary objective of the project was to support more home games it is inappropriate to say "…nor will the number of swimming events change greatly...".

The notice card states "A public hearing before the planning commission of the city of Laguna Beach…". I can find no corresponding schedule for the city, so added clarity on the role of the city would be helpful. Additionally, does the approval process require LBUSD board approval and, if so, a simple majority?

Lighting

Lighting is to be reviewed and approved by city staff to be in compliance with Good Neighbor Lighting regulations. City light regulations are acknowledged to be dated in regards to current available technology as well as being primarily residential focused. **Use of the most current available technology to control glare and light leakage should be deployed along with timers or other methods to manage use hours**. In addition to lights location, orientation of scoreboards, clock timers, etc should be addressed to minimize leakage outside the footprint. C-2

Figure 3.3-3 lists four 40' light standards but 3.3.5 references 24'?

Current functions of the lights on the neighboring tennis courts are inconsistent so is "linking" or upgrading should be considered.

C-2

Noise

Representing "no or minimal impact" due to the project being "replacement" with no increased use is inconsistent with the stated district operational plan. In the assessment it is important to view noise and time together as noise at 6:00am has a different impact than the same noise at 1:00pm. When the current pool was proposed in 1992-3 local residents, many of whom are still in the same homes, were promised sound mitigation that was never addressed.

The district has proposed reduced hours of operation given the expanded capacity of the facility including ending at 8:00pm but have been essentially silent on morning hours. What are planned hours of operation and what activities will be scheduled in what time slots? WP at 6:00am (potentially 3X current) would not be in compliance with the city noise ordinance that prevents construction or landscape work before 8:00am. Has there been consideration to follow city noise ordinances that apply to residents?

The sound testing poorly aligned with actual and planned uses as the tests were performed during the quietest use activities. A primary stated objective of the district was to support multiple concurrent water polo practices. District plans show three teams in the water at the same time. Noise sampling of "swimming and light conversation" versus expected use of horns, bells, whistles, and shouting from three WP teams simply isn't representative.

C-3

The statement "The pool is surrounded by high walls and, on the north side by a building." is not accurate. The east side shows a very low wall and the existing chainlink fencing of the tennis courts. Sound mitigation techniques and solutions were presented at a public district meeting on June 27, 2023 but it appears none have been incorporated into current plans. **Given the near 3X increase in spectator capacity, change of spectator seating orientation, increased use, increased density, and increased events, consideration should be given to added sound mitigation including the techniques presented of attenuation walls, covered facility, audio design and time restrictions.**

A sound attenuation wall that "traps" as much noise as possible inside the envelope to replace the west side fence of the tennis courts should be included in the plans.

Construction noise is a concern but the commitment to follow city building ordinances on sound and hours of operation is expected to be a mitigating factor.

Traffic and Parking

Parking in the vicinity of the high school is currently heavily constrained when school is in session, so even minor impacts should be carefully considered. Section 3.3.4 implies there may be an option ("may require")that doesn't result in lost parking spaces. Is there an option under consideration that is not included in the materials? Figure 3.3-3 shows five parking stalls but the accompanying narrative states seven; this should be consistent.

The statements that traffic related impacts will not increase because use of the facility is not expected to increase do not align with district presentations on expected operation. **Options should be reviewed with the city to maximize parking while minimizing resident impact.** T-lined parking spots, red curbs, clear signage may provide better use of existing parking and unnecessary city enforcement.

C-4

Construction Specific

How many total parking spots are eliminated during construction? Figure 3.4-2 shows eliminated spots on Park but does the no parking extend further east than covered in the graphic? How many transient (daily in/out) contractor/labor vehicles are anticipated during construction? The intersection of Park and Manzanita is a heavy concentration of vehicles and student pedestrians crossing Park north and then

Manzanita west. The plans call for adding a "staging and entrance" to that same location. It seems sight lines may be impacted so consideration should be given to relocating crossing points during construction. **Consideration should be given to a reserved construction only parking section in the district parking lot.** That would provide assured labor parking avoiding circling for parking and back up horns of construction trucks in residential areas. The parking lot is very close to constructIon and can be adjusted for when school is not in session.

C-4

Safety

Comments regarding parking and construction traffic in heavily traveled pedestrian areas are obviously a priority. Keep in mind key student arrival and dismissal time when extra caution (crossing guards?) should be considered. Often the "mass exodus" from the high school is augmented with toddlers coming back from an outing to Anneliese School or being picked up by parents.

The pool is in a bit of a sunken space so details of how to secure the site from inappropriate access should be addressed. Does the use of a pool cover, as outlined in the plans, present a higher drowning risk should "unauthorized" access occur? Perhaps technology that senses pool or cover contact triggering an alert?

C-5

Other

Aesthetics - The project plans and narrative represent there will be no view impact and, in fact, states there will be a minor view improvement. The artist renderings are helpful but they obviously can't address every dimension and the orientation of the building is changing. **I would request the buildings be "staked" as is done for any residential construction to provide clarity and avoid surprises during construction.**

Near the end of Section 4.1.a the building and pool are referred to as "similar to those already in place". Given the pool is 80% larger and the building is now two stories and significantly larger it seems that description could be more accurate.

I counted several hundred solar panels most with direct line of sight into the neighborhoods above and surrounding the pool. **What actions are being taken to eliminate reflection or glare from the panels?**

I didn't see any ADA specifications but assume that's a requirement. The current pool configuration has a sloped ramp that I don't see in the new plans. I would assume a mechanical chair is being proposed? That's a significant loss of functionality for those with physical limitations.

Have you researched and are prepared to defend that the architect of the existing building has no historical or "important person" classification as noted in Section 4.5.3-a "that are associated with the lives of persons significant in our past."

C-6

Additional Observations

I offer the following as "proofreading" to help improve the quality of the final document. While many may seem minor the quantity and materiality of some could lead toward a quality conclusion of the overall document:

*There are several references to Appendices including in the Table of Contents but was unable to find them.
***The notice card says the hearing will be before the Planning Commission of the City of Laguna Beach, but the location is a district facility.**
1.1 Refers to a 50M pool
1.1 Address 670 or 625
4.9.c Tony Tobin Elementary School is not near the project
4.9.d Does not apply the project location
4.9.-1 Locations listed are in near project site

C-7

4.9.e The airport referenced is not the nearest
4.17.c Manzanita does not have sidewalks on both sides
4.19.a States heating by natural gas, Figure 3.3-8 shows solar
419.a Water Treatment speaks to Centennial High School?
4.19.d The city does not contract with Waste Management but rather CR&R



Comment Letter D

Attn: Ryan Zajda, Director of Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
rzajda@lbusd.org

Re: Public Comment on Laguna Beach High School Pool Modernization IS/MND

Dear Mr. Zajda,

I am writing to formally express my concerns regarding the **Laguna Beach High School Pool Modernization Initial Study and Mitigated Negative Declaration (IS/MND)**. As a **mother, business owner, and active member of the Laguna Beach community**, I urge the District to reconsider the proposed expansion to a **45-meter pool** due to its excessive scale, environmental impact, and unnecessary cost. D-1

I have **first-hand experience with the pool**—I take my children there every summer, and I **regularly exercise at the facility twice a week**. While it is clear that the pool and facilities need improvements, the proposed expansion **goes far beyond what is necessary** and would result in the **loss of valuable community assets**, including: D-2

- The **kiddie pool**, which is a vital resource for families with young children.
- **Existing locker rooms**, which would be relocated to an already limited parking area.
- **Parking spaces**, further straining an area that already struggles with availability.

Additionally, the IS/MND contains **numerous inconsistencies** that must be addressed: D-3

- **Increased Water and Energy Use**: A 45-meter pool will require significantly more resources for heating, maintenance, and water refilling, yet the IS/MND does not adequately account for these impacts.
- **Noise and Light Pollution**: The addition of 40-foot lighting poles and increased water polo activity will introduce **excessive glare, noise, and disruption** to surrounding residents, which the IS/MND fails to assess properly.
- **Traffic and Parking Issues**: The loss of parking spaces and increased usage will **worsen congestion in an already impacted neighborhood**.
- **Lack of Transparency and Community Engagement**: The approval process has lacked meaningful community input, and the IS/MND does not sufficiently consider **alternatives** that would better align with community needs.

I strongly encourage the LBUSD to **reject the current proposal** and instead pursue a **smaller, more practical alternative** (such as a **35- to 38-meter pool**) that **balances student-athlete needs with the interests of the broader community**. D-4

Spending $25 million on an oversized aquatic facility for a school with declining enrollment is not a responsible or community-conscious decision. Improvements should be **smart, sustainable, and responsive** to the needs of all Laguna Beach residents—not just a select few.

Sincerely,
Amber Sparks
Laguna Beach Resident, Mother and Businessowner

Comment Letter E

Comment Letter E (with attachments)
From: **Larry Zeman** <larryzeman@gmail.com>
Date: Wed, Feb 12, 2025 at 3:24 PM
Subject: CEQA input and opposition to current Laguna Beach HS pool plan
To: <ewahlstromrogers@lbusd.org>
Dear LBUSD:

My name is Larry Zeman and I have lived on Los Robles since 1994. I oppose the proposed LBUSD development and agree with all the points made by Sensible Laguna, which they state far better than I could. In sum, the LBUSD proposal would drop an enormous outsized development in our nearly 100-year old historic neighborhood that cannot come close to absorbing the scale and impact that would follow. E-1

Our neighborhood is called El Mirador and El Bosque and was developed in 1928, nearly 100 years ago. As stated in the attached State of California Historical Resources Inventory listing, our neighborhood was created by the Yoch Family that helped found Laguna Beach (Hotel Laguna, etc.) and is **"unlike any other in Laguna. It is the only neighborhood to be subdivided with a curvilinear street plan on a very gently sloping terrain"**. E-2

Toward that end, I'm attaching the following two documents: E-3

- State of California Historic Resources Inventory listing for our El Mirador and El Bosque neighborhood. The description details the uniqueness of our neighborhood as pictured in a street map including Short, Los Robles, El Bosque, Wilson and Catalina streets along with LBHS that remain as-is through today.
- The Yoch Family's original 1920s brochure offering lots in our neighborhood showing the same and surrounding streets noted in the Historical Resources Inventory listing. This layout and small scale of our neighborhood has not changed over the next 100 years and would be severely impacted by the LBUSD proposed development.

Our historic neighborhood is characterized by its narrow curved streets and eclectic traffic patterns that include many stop signs, speed bumps and a roundabout, which are not designed to accommodate the impact of the school district's proposed development. E-4

Moreover, our main traffic arteries include Park and Legion, which are the only evacuation routes for us as well as many other residents and would be greatly impacted during and after the construction of LBUSD's proposed development. E-5

I understand that the LBUSD has not performed any traffic or other impact studies on how its proposed development will affect our historic neighborhood. Clearly, that needs to be done before the LBUSD takes any other action. If those studies were performed, the obvious conclusion would be reached that the LBUSD's proposed development should not proceed as planned. E-6

Please pass my comments in this email on to the appropriate decision makers.
Thank you,
Larry Zeman



BUY IN AN ENVIRONMENT OF BEAUTY

There is but one "Most Beautiful Place on the Pacific Coast." Laguna Beach. El Mirador is the choicest part of Laguna Beach.

BATHING BEACH AT LAGUNA

APPROACH FROM CANYON DRIVE

RUGGED SHORES OF LAGUNA BEACH

Advantages

EL MIRADOR, the model subdivision, which has been planned for comfort and beauty, will have every advantage that thought and money can give it. When The Yoch Company, owners and subdividers, turn over El Mirador to its final owners, it will be with all improvements completed, ready for real living. Paved streets, with cement sidewalks and curbs will be given color by the planting of trees and shrubs. All the necessities, such as water, gas, electricity, sewers, etc., will be ready for service when the lot owner is ready to build. Fine roads, well laid out, connect El Mirador with other important arteries. The public school is within a short distance, as are the churches, the clubs and the business district. The tract ties in via pedestrian subway directly with the Beach, which can easily be reached from the fartherest lot in El Mirador within a five minute walk.

A unique and artistic scheme of ornamental lighting will make the streets of El Mirador charming to the passerby, as well as a convenience to residents.

Restrictions as to set back line, the protection of beautiful vistas, restricted building and color schemes will make El Mirador one of the most artistic subdivisions on the Pacific Coast. Climate, improvements, art, scenery and accessibility make for solid value. That is why El Mirador offers the best possible opportunity for safe investment.

Climate - Scenery

LAGUNA BEACH has no rival for all year-round climate. This perfect climate is due to the range of the Laguna hills which parallel the coast and to the two magic islands of San Clemente and Catalina which lie in plain view—exquisite mosaics set in a jeweled sea.

Frost and snow are unknown here, and the winds so dreaded in some places are here only welcome breezes from the sea. The children bathe in the ocean every day of the year, and yet there is none of the humidity so distasteful to many who visit the tropics. There is no extended rainy season. Gardens prosper throughout the year, thanks to rich, loamy soil and an unlimited supply of the purest and finest water, delivered to Laguna Beach through a $600,000 water system of the most modern type.

In the very heart of this scenic and climatic wonderland lies El Mirador, not a subdivision in the ordinary sense, but a replat of ground held for many years as the choicest part of the most entrancing bit of coast line on the Pacific. The hills, the tree covered slopes, the rugged shore, the ever changing color of the sea, and the rare beauty of the sunsets entrance and charm the permanent resident as they do the casual visitor.

Artists' Colony

THE Laguna Beach Artists' Colony is one of the most famous in America and the largest west of Chicago. The painters, attracted by the magnificence of the coast line and the unrivalled sunsets, (reproductions of which hang in most of the great Art Galleries in America,) have built their studios on the hills above the sea. The world has beaten a path to their door and Laguna's fame has risen with the fame of the Artists' Colony. A new Art Gallery, designed by Myron Hunt, renowned architect, stands on a prominent point, overlooking the Pacific. Exhibitions by the painters of California are to be seen at all times in the old Art Gallery and in the studios.

Schools & Clubs

WITHIN one block of El Mirador stands a beautiful new school building costing $125,000. It commands a view more superb than is possessed by any other school in Southern California. The teaching staff of the Laguna school has an enviable reputation for excellence.

The new Community Club, the center of the social life of Laguna, is also housed comfortably in a modern and spacious home.

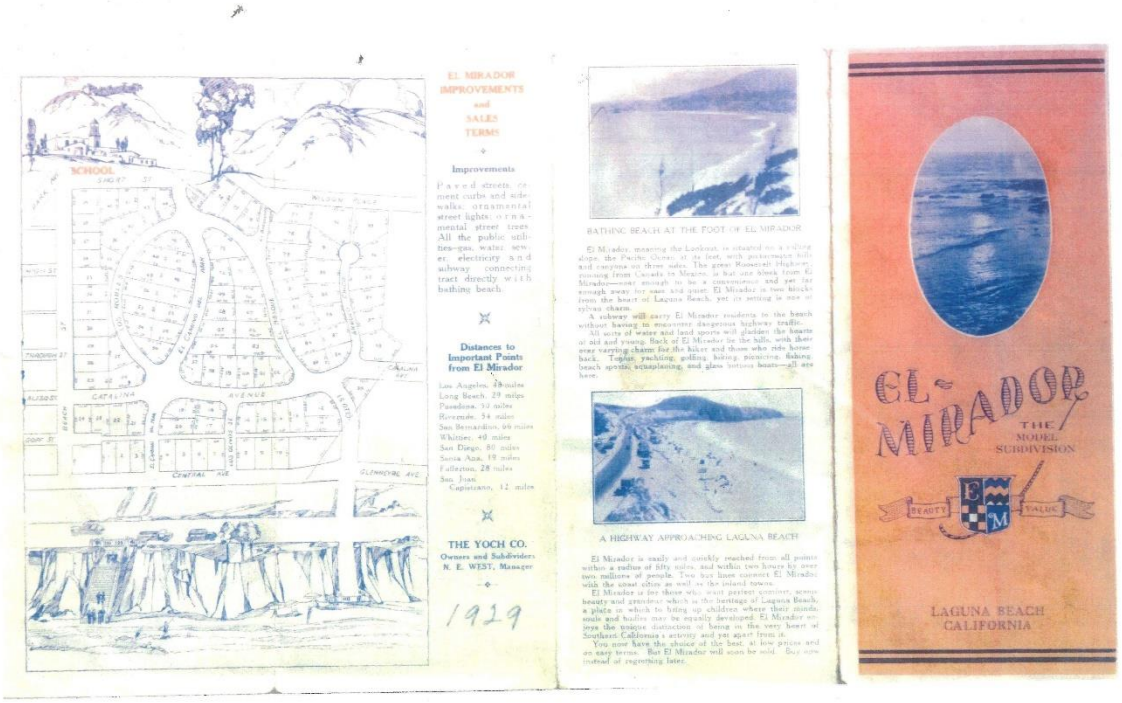
A good library, artistic church buildings and a high regard for civic beauty contribute to make Laguna Beach distinctive.

Much attention is being paid to beautifying the business section of the town. Entire sections are being changed to conform to Laguna Beach's idea of the future city beautiful. Splendid homes dot the hillsides, homes of men and women gathered from all parts of the world to enjoy the climate and scenic grandeur which belong to Laguna Beach; an up-to-date theatre brings the newest and best from the play world. Laguna will never be a jazz beach or a Coney Island. El Mirador is meant for people who desire a quiet, dignified, beautiful home where the artistic side of life is ever uppermost.

ISCH BUILDING

ART GALLERY

THE YOCH CO. · Owners and Subdividers · Laguna Beach, Cal.



EL MIRADOR IMPROVEMENTS and SALES TERMS

Improvements

Paved streets, cement curbs and sidewalks, ornamental street lights, ornamental street trees. All the public utilities—gas, water, sewer, electricity and subway connecting tract directly with bathing beach.

Distances to Important Points from El Mirador

Los Angeles, 49 miles
Long Beach, 29 miles
Pasadena, 50 miles
Riverside, 54 miles
San Bernardino, 66 miles
Whittier, 40 miles
San Diego, 80 miles
Santa Ana, 18 miles
Fullerton, 28 miles
San Juan Capistrano, 12 miles

THE YOCH CO.
Owners and Subdividers
N. E. WEST, Manager

1929

BATHING BEACH AT THE FOOT OF EL MIRADOR

El Mirador, meaning the Lookout, is situated on a rolling slope, the Pacific Ocean, 40 to 100 feet, with picturesque hills and canyons on three sides. The great Roosevelt Highway, running from Canada to Mexico, is but one block from El Mirador—near enough to be a convenience and yet far enough away for quiet and quiet. El Mirador is two blocks from the heart of Laguna Beach, yet its setting is one of sylvan charm.

A subway will carry El Mirador residents to the beach without having to maneuver dangerous highway traffic.

All sorts of water and land sports will gladden the hearts of old and young. Back of El Mirador lie the hills, with their ever varying charm for the hiker and those who ride horseback. Tennis, yachting, golfing, hiking, picnicing, fishing, beach sports, sightseeing, and glass bottom boats—all are here.

A HIGHWAY APPROACHING LAGUNA BEACH

El Mirador is easily and quickly reached from all points within a radius of fifty miles, and within two hours by over two millions of people. Two bus lines connect El Mirador with the coast cities as well as the inland towns.

El Mirador is for those who want perfect quietude, scenic beauty and grandeur which is the heritage of Laguna Beach, a place in which to bring up children where their minds, souls and bodies may be equally developed. El Mirador enjoys the unique distinction of being in the very heart of Southern California's activity and yet apart from it.

You now have the choice of the best, at low prices and on easy terms. But El Mirador will soon be sold. Buy now instead of regretting later.

EL MIRADOR

THE MODEL SUBDIVISION

BEAUTY EM VALUE

LAGUNA BEACH CALIFORNIA

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

HISTORIC RESOURCES INVENTORY

Ser. No. 30-2651-14-D
HABS ____ HAER ____ NR 5D SHL ____ Loc ____
UTM: A 427700/3712560 B 427700/3711080
C 428120/3711080 D 428120/3712560

IDENTIFICATION
1. Common name: El Bosque Street Neighborhood
2. Historic name: El Mirador Tract
3. Street or rural address: Multiple
City Laguna Beach Zip 92651 County Orange
4. Parcel number: Multiple
5. Present Owner: Multiple Address: ____
City ____ Zip ____ Ownership is: Public ____ Private XX
6. Present Use: Single-family residential Original use: Same

DESCRIPTION
7a. Architectural style:
7b. Briefly describe the present *physical description* of the site or structure and describe any major alterations from its original condition:

The El Bosque Street neighborhood is located just south of Legion Street on land which was not subdivided until 1928. Only a few homes in the neighborhood were built prior to 1940, and they are itemized here; the vast majority of homes in the neighborhood date to the 1950's and 1970's. The neighborhood was subdivided with a curvilinear street pattern unlike any other neighborhood in Laguna.

The earliest hosues which remain were built primarily on the large corner lots afforded by the looped street configurations. These houses are larger estate type homes in the Mediterranean, Normandy and Provincial Revival styles popular during the 30's. The houses remain in excellent, unaltered condition.

Attach Photo(s) Here

8. Construction date: Estimated ____ Factual 1931-40
9. Architect Multiple
10. Builder Multiple
11. Approx. property size (in feet) Frontage 75' Depth 100' or approx. acreage ____
12. Date(s) of enclosed photograph(s) November 1980

DPR 523 (Rev. 4/79)

13. Condition: Excellent X Good ____ Fair ____ Deteriorated ____ No longer in existence ____

14. Alterations: ____

15. Surroundings: (Check more than one if necessary) Open land ____ Scattered buildings ____ Densely built-up ____
Residential X Industrial ____ Commercial ____ Other: ____

16. Threats to site: None known ____ Private development X Zoning ____ Vandalism ____
Public Works project ____ Other: ____

17. Is the structure: On its original site? X Moved? ____ Unknown? ____

18. Related features: Some with original garages.

SIGNIFICANCE

19. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site.)

The El Bosque Street neighborhood is unlike any other in Laguna. It is the only neighborhood to be subdivided with a curvilinear street plan on very gently sloping terrain. Houses are not oriented toward the ocean, but toward the inward looping configuration of the streets. This was the last of the low lying parcels beneath the foothills to be subdivided. On this land which remained vacant until subdivision in 1928, it is clear that the Yoch Co. (subdividers of the land) were attempting to provide for large estate lots rather than smaller lots tailored to bungalow beach cottages. This neighborhood has a more formal, less beach oriented quality, than others in the vicinity.

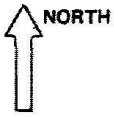
The early houses in the neighborhood, though they are few, are good examples of the Period Revival styles popular in Laguna through the 30's. In a neighborhood which is architecturally set apart from others in lower Laguna, it is important that the few early homes receive recognition.

20. Main theme of the historic resource: (If more than one is checked, number in order of importance.)
Architecture 1 Arts & Leisure ____
Economic/Industrial ____ Exploration/Settlement ____
Government ____ Military ____
Religion ____ Social/Education ____

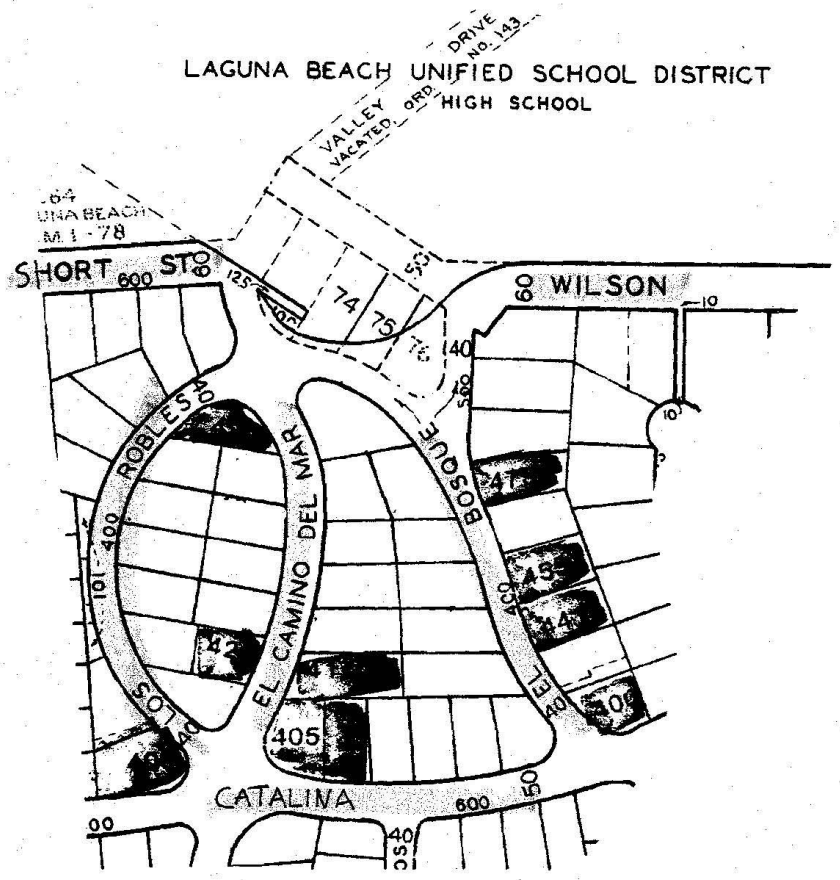
21. Sources (List books, documents, surveys, personal interviews and their dates).
Orange Co. Assessor's Records
Laguna City Directories, 1932-45
South Coast Newspaper

22. Date form prepared May 1981
By (name) Kathleen Les
Organization Environmental Coalition
Address: 206 W. 4th St., Ste. 316
City Santa Ana Zip 92701
Phone: (714) 836-4314

Locational sketch map (draw and label site and surrounding streets, roads, and prominent landmarks):



EL BOSQUE NEIGHBORHOOD



PAGE 3 OF 6

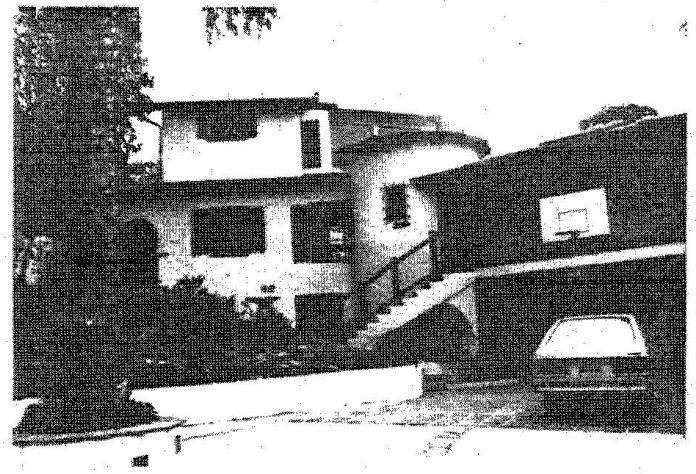


1. 400 El Bosque 1931 (C)

A Provincial Revival house with an "L" plan in front and a large octagonal turret in the apex of the "L". The gabled roof is steeply pitched and sheathed in shingle finishing as is the conical roof on the turret. Entry is recessed with brick lining the inset area. The house is finished in textured stucco and sits on a large corner triangular lot.

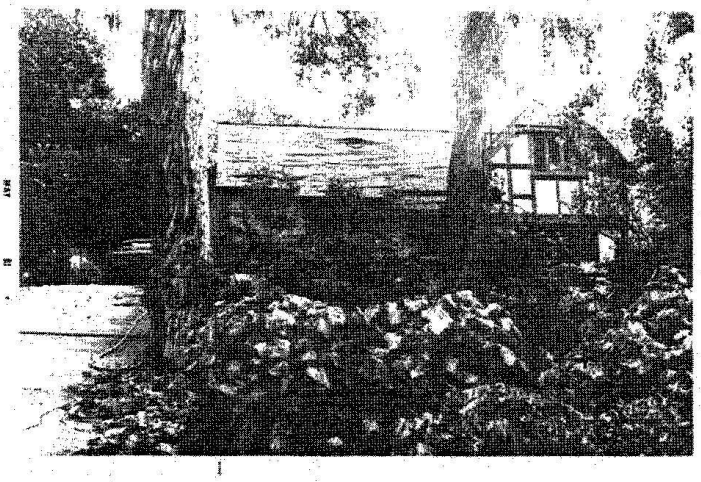
This house was built for Mr. and Mrs. Allen Sewell of Toronto, Canada. He had been a captain of the Royal Field Artillery during W.W. I and was a landscape gardener at the time the house was built. It was designed by architect Robert Coleman, Jr.

PAGE 4 OF 5



2. 441 El Bosque 1931 (K)

A three-story Spanish Mediterranean Revival with characteristic flat tiled roof and stucco siding. The house has an irregular plan arranged in a slight "C" formation and is distinguished by a large corner turret with spiral stairway leading to the arched door. This forms the main entry to the house. An arched walk through leads to the side yard on the ground level. The casement windows are predominantly shuttered.



3. 455 El Bosque 1932 (E)

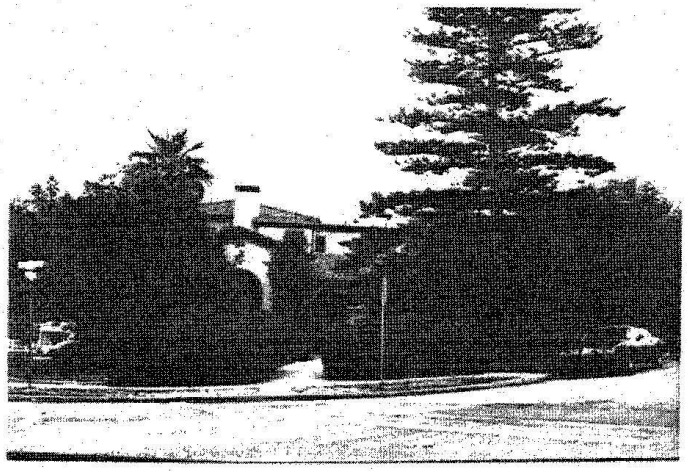
A Normandy Revival house set back on a sloping lot. The house incorporates a rectangular plan with a gabled roof and stucco siding. Tiled ridges and wavy shingles embellish the roof while half-timbering embellishes the faces below. Large multi-paned casement windows are present throughout. Entry is at center beneath a slight roof overhang. A detached garage is below at street level.



4. 475 El Bosque 1932 (K)

An "L" plan bungalow of one story which sits high on an elevated lot and is reached by a meandering brick pathway. The house has a gabled roof and is sheathed in clapboard. Wood shutters frame the multi-paned casement windows. A detached garage is below at the street level.

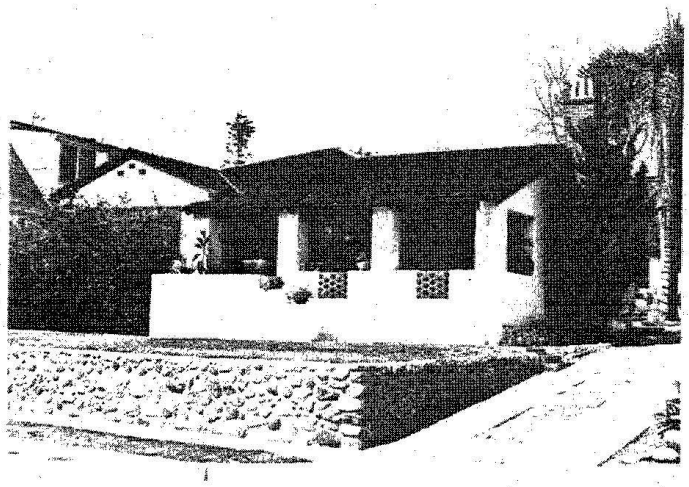
Margaret Wilder Sheppard, water colorist and artist, lived here as of 1946.



5. 400 Los Robles ca. 1930 (estimate) (K)

A large Mediterranean Revival house on a triangular corner lot. The house has a varied roofline sheathed in tiles that punctuate the various projecting wings of the house. The main entry is recessed beneath an arcaded porch with arched openings and wide piers. Windows are all slightly recessed and framed in wood. A large recessed arched window adorns the main front-facing gable. The house is two stories with the second story set back over the rear portion of the main body.

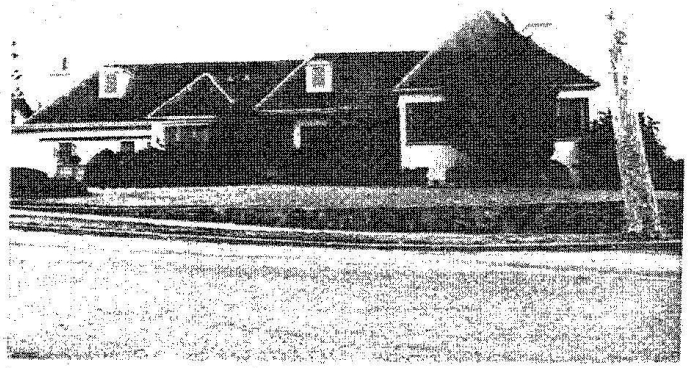
PAGE 6 OF 8



6. 654 Catalina 1930 (K)

A Mediterranean Revival bungalow with "L" plan, multi-gabled roof and textured stucco siding. A full length porch supported by large piers extends from the front-facing gable across the front. Mediterranean embellishments include tile ridges on the roof, tiled gable venting, brick chimney with tiled cap and large square openings in the porch.

This Mediterranean Revival house was designed by Aubrey St. Clair and lived in from 1935-78 by the Joseph Andrus family. Mr. Andrus is the founder and proprietor of Andrus Plumbing, one of the oldest plumbing businesses in Laguna Beach.



7. 405 El Camino del Mar 1940 (K)

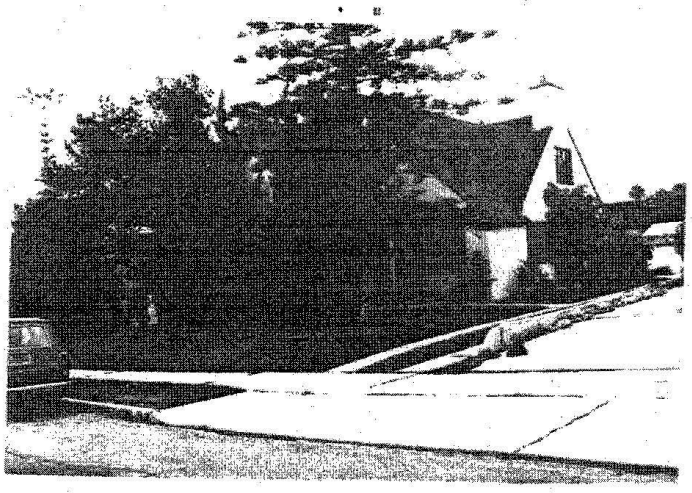
A Normandy Revival style house of one story with a hipped roof and stucco finishing. Tiled ridges enhance the roofline. Below, the house is configured in an "L" plan. Entry is at center and is embellished with Colonial pilasters.

This house was built by the contracting firm of Ropp & Mackey for H.P. Walden of Pasadena.



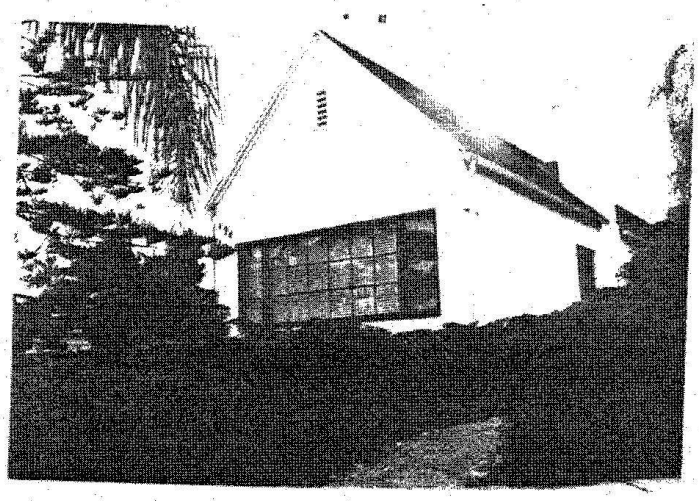
8. 417 El Camino del Mar 1932 (C)

A low-to-the-ground Mediterranean Revival influenced house with a gabled roof and recessed entry porch. House is finished in textured stucco and also includes a tapered brick chimney. Multi-paned casement windows are used throughout.



9. 420 El Camino del Mar 1940 (K)

A Provincial Revival house with box plan and steep-pitched multi-gabled roof. Double front-facing gables provide the primary architectural focal point; entry is on the side of the forwardmost gable. Multi-paned casement windows are shuttered.



10. 494 El Camino del Mar ca. 1940 (estimate) (C)

A large Provincial Revival house which occupies a rounded corner lot. The house has a steep-pitched gable roof with a contrasting smaller front-facing gable. Entry is at center beneath the roof overhang. A large stucco chimney is also on the front face.

LBUSD

Comment Letter F

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

comments regarding pool moderinization MND document

2 messages

Chris Alonso <thebigspooky@gmail.com> Mon, Feb 17, 2025 at 3:49 PM
To: ewahlstromrogers@lbusd.org
Cc: Mary Alonso <alonso.mc@gmail.com>

Hi Elia et al -

I am writing as a local resident and neighbor of the high school to register my concerns about the Mitigated Negative Declaration document regarding the "pool modernization project".

Our concerns are related to the environmental impacts for residents in the local neighborhood. The document seems to dehumanize the considerable impact this will have on local residents. Specifically - F-1

- Construction Noise - the document outlines about 14 months of considerable noise, vibrations, and related construction effects. As a local resident home during the day (with a senior dog and 2 nervous cats) this is a major impact on our peace and wellbeing. And if the project is not on time, this could last for years. F-2
- Construction Parking - the document seems to ignore the impact of local residents on losing access to street parking during the construction period - this is where many local residents park. F-3
- Noise & Lighting Impact of finished project - we have concerns about the increased noise and light pollution that seems likely from a project with increased capacity. I saw no reference or study for how the new lighting system will impact residents, their views, the ability to enjoy the evening sky, just "add 40 foot light poles". This seems to be minimizing the impact of the project, not genuinely trying to measure and assess the impacts to the local community. F-4

I look forward to continuing this discussion at the community hearing on March 13th.

Chris Alonso

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org> Thu, Feb 20, 2025 at 4:21 PM
To: Chris Alonso <thebigspooky@gmail.com>
Cc: Mary Alonso <alonso.mc@gmail.com>

Hi Chris and Mary,

Thanks for submitting your comments regarding the CEQA process for the Laguna Beach High School Pool Modernization Project. Your input has been received. If you have any additional questions, please do not hesitate to reach out.

[Quoted text hidden]

--

All the best,

Elia Wahlstrom Rogers (she/her)
Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont St. | Laguna Beach, CA 92651
949-497-7700 Ext. 5240
Website | Instagram

LBUSD

Comment Letter G

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

Proposed high school pool modifications

2 messages

Laura Tarbox <laura@tarbox.com> Wed, Feb 19, 2025 at 4:30 AM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

I AM SORRY THIS IS LATE! I WAS TRAVELING OUTSIDE THE COUNTRY AND HAD TROUBLE WITH MY EMAIL AND I JUST NOW REALIZED IT HAD NEVER SENT!

I have lived in my home at 812 Manzanita for 16 years. I am right above the high school tennis courts, and adjacent to the pool. I am just sick to think of what will happen to my lovely neighborhood and quality of life if this project goes ahead at the currently proposed scale. This is a project that is not needed in a district and community of our size simply to benefit a relative few students. G-1

Notwithstanding the cost, overall environmental impact of increased water usage, lighting, and pollution from more traffic, and considerations of how funds might be better spent to benefit a larger number of students, I am obviously concerned about the direct impact on our properties that are immediately adjacent to the pool. It is disingenuous for anyone to say that usage and traffic will not increase with the increased size of the pool. Already, there is very little parking availability, lots of noise, and people pulling in and out of my driveway constantly to turn around. (A large planter with a cypress tree on the front side of my garage was recently left smashed on my driveway due to this activity, so I am looking into barriers or a gate across my driveway to stop people from using it in this manner.) G-2

Much has already been written by impacted residents, but the lighting, decreased views, and increased noise and usage is untenable in this already tight space. Yes, I bought my home knowing I am next to these facilities, but I could not have imagined there would be anyone who would ever think there was room for expansion in this already small footprint. What I did not understand was the lack of recourse we have as residents and citizens, and I had thought our School Board would be more considerate of the neighbors and taxpayers in this community, especially when a compelling need case has not been made. It is insane to me that a few parents have been able to push this forward for their kids at the expense of other kids not playing water polo or swimming, as well as the local residents who will be impacted long after their kids are gone. G-3

Please consider going with a smaller, less expensive option, keep in mind impacted views, and look at adding noise and light mitigation as has been requested by other neighbors. G-4

Sincerely,

Laura

Laura Tarbox, CFP®

Founder & CEO

TARBOX FAMILY OFFICE

500 Newport Center Drive, Suite 500
Newport Beach, CA 92660

7047 E. Greenway Pkwy, Suite 250
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www.tarbox.com

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Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org> Thu, Feb 20, 2025 at 4:18 PM
To: Laura Tarbox <laura@tarbox.com>

Hi Laura,

Thanks for submitting your comments regarding the CEQA process for the Laguna Beach High School Pool Modernization Project. Your input has been received. If you have any additional questions, please do not hesitate to reach out.

[Quoted text hidden]

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All the best,

Elia Wahlstrom Rogers (she/her)
Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont St. | Laguna Beach, CA 92651
949-497-7700 Ext. 5240
Website | Instagram

LBUSD

Comment Letter H

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

LBHS Pool Modernization Project

1 message

Patrick Stoner <pgs92651@icloud.com> Sun, Feb 16, 2025 at 10:00 AM
To: ewahlstromrogers@lbusd.org

The MND proposal is rife with errors and omissions, and therefore misleading to the public. There is reference to appendices that do not exist in the body of the proposal. A new report needs to be revised and submitted. As a neighbor, my concerns are lighting, noise, traffic, emergency evacuation, and quality of life. H-1

Lighting needs to have a height restriction and shielding. H-2

Noise from activities in the pool are swimming and water polo, with the latter generating significantly higher noise levels. There is no mention of water polo in the body of the MND, only swimming. Additional noise will be generated from 270 potential spectators. H-3

In view of the LA fires, we must be vigilant concerning emergency evacuations. Park Avenue is the main artery from Top of the World, Thurston, and the Village Area. Construction traffic is a major impediment to an organized evacuation. H-4

My last concern as well as most residents and visitors is parking. Where are 270 spectators going to park I an already congested neighborhood? H-5

concerned neighbor,

Patrick Stoner

LBUSD

Comment Letter I

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

LBUSD Pool Modernization Comments re MND

1 message

Steve Brown <brown.steve1265@gmail.com> Sun, Feb 16, 2025 at 5:06 PM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

Here are my comments regarding the CEQA document related to the Laguna Beach High School Pool Modernization Project Initial Study and Mitigated Negative Declaration (IS/MND).

Comment Period Related Issue

The comment period does not adequately comply with CEQA requirements:

- The MND was published by LBUSD on January 17, 2025 per the mailing, but public notification was postmarked January 21 and arrived by January 23. This caused a cumulative 6-day delay or about 20% of the response time expected under CEQA. The public comment period per the documentation provided is from January 17 to February 17, 2025.
- Care should be taken to ensure the public has had enough opportunity to review the materials and comment. To ensure adequate public review, consider revising and resubmitting the documents for comments.

I-1

Significant Structural Issues

Critical Appendix information is not included:

- The document states, "Technical studies and other documents, which include supporting information or analyses used to prepare the IS/MND, are included in the following appendices," yet these are not provided.
- This information is important as it is referenced multiple times throughout the document for technical support regarding mitigations and analysis.
- Appendices are technical in nature and designed to support mitigations discussed, but they were not made available to the public at the start of the 30-day review period, thus the CEQA process is incomplete. It is challenging to determine the environmental impacts or benefits of mitigation measures without these appendices due to their significance to the document and project.
- The missing appendices identified in the document are stated as follows: Appendix A1 Project Plans; Appendix A2 Estimated Construction Schedule; Appendix A3 Logistics Site Plan; Appendix B CalEEMod Input and Results for Air Quality Analysis; Appendix C Biological Resources Assessment; Appendix D Cultural Resources Assessment; Appendix E1 Geotechnical Report; Appendix E2 Paleontological Records Search; Appendix F Environmental Radius Report; Appendix G Ambient Noise Measurement Data; Appendix H Limited VMT Analysis.
- Please attach all exhibits and resend the entire document to the public once updated so that the review can be completed.

I-2

Document appears to incorporate significant erroneous information from unrelated consulting projects or other sources that are inapplicable to the Laguna Beach IS/MND:

- Significant errors in the document suggest a possible "cut and paste" approach by the consultant, utilizing content from prior unrelated projects rather than focusing on the Pool Modernization Project in Laguna Beach. These errors should have been identified and corrected during district and other reviews but were not.
- Due to the document's design, it is not clear to the public whether issues are confined to specific sections or if other areas, particularly those with technical content, pertain to the environmental impact area in question in Laguna Beach, elsewhere, or are from entirely different projects.
- These inconsistencies are scattered throughout the document, leading to structural issues that raise questions about whether the public is reviewing information pertinent to the Laguna Beach

I-3

project, another district project, or elements of both. The report should be thoroughly reviewed and revised. In its current form, multiple issues within the CEQA analysis would require mitigation if included. I-3

Examples of such issues present throughout the document include such things as:

- References to an airport and "nearby" schools that are located 80 miles or more inland and away from Laguna Beach. This has no relevance.
- Other discrepancies also exist. For instance, the term "project" is contextually appropriate, but in other places, it shifts to "school," which is not correct for this project. This indicates content from another document was incorporated with unknown impact or relevance. Schools versus projects have different potential environmental impacts, so this must be clarified.
- Beyond adding confusion, there are numerous references that could necessitate mitigation not considered in the document, potentially due to copy-paste errors or inadequate review. I-4

Examples provided and many others not listed may have been copied from unrelated documents:

- Mismatches in pool dimensions (50 meters vs 45 meters)
- Multiple conflicting lighting specifications (40-foot poles more suited for a football field vs 24-foot poles similar to nearby tennis courts)
- Planting plans involving trees that could obstruct views (after stating views are not obstructed) like the Mexican Fan Palm (100 feet maximum height), Marina Strawberry Tree (40 feet), Giant Bird of Paradise (30 feet) and Red Rocket Crape Myrtle (20 feet) I-5
- Intermingling shifting terms for the project (may have come from other sources or documents) such as aquatic center, aquatic facility, aquatic complex and swimming pool
- Given these issues, many references do not relate to the Laguna Beach project. Please revise and update the document comprehensively. Ensure all supporting documentation, exhibits, and appendices are accurate to prevent misleading the public. Once revisions are complete, reroute the entire document with attachments for public input. The current document lacks cohesion and does not support a reasonable public review related to CEQA; therefore, it should be corrected and resubmitted for review.

The document does not address the unique environmental impact of water polo:

- The project description does not specifically mention that the proposed aquatic center will be heavily used by water polo teams and is designed to host CIF events.
- The document states that "the facility improvements may increase the public's use of the pool area and may also attract more visitors during swim meets." However, it does not address any potential impact related to water polo. This could be a significant environmental impact that has not been included in the analysis.
- Throughout the planning process for a new aquatic center and addressing the needs of aquatics athletes and city usage (including water polo clubs), the District and School Board have frequently stated that the increased size of the pool and design are primarily needed to support water polo. I-6
- The sport of water polo has several potential environmental factors (noise, lighting, traffic, etc.) that should be addressed under CEQA. These elements need to be incorporated into the document and properly analyzed.
- For example, water polo generates more noise than swimming, with frequent referee whistles and horns. A typical water polo game whistle (Fox 40) can reach a sound level of 115 decibels, which is very loud and audible even in a noisy pool environment.
- Bodet Sport, a manufacturer of water polo scoreboards, indicates that integrated horns of 90 decibels are built into its systems and used to announce stoppages of play.
- According to the American Speech Hearing Association, humans can listen to sounds at 70 decibels or less for as long as desired. Sounds at 85 decibels can lead to hearing loss if listened to for more than 8 hours. Sounds over 85 decibels can damage hearing more quickly, cutting safe listening time in half for every 3-decibel rise over 85. For instance, humans can listen to 88-decibel sounds for 4 hours and 91-decibel sounds for only 2 hours.
- A 115-decibel sound, such as the water polo whistle, exceeds the "average human pain threshold" of 110 decibels according to Purdue University. This information should be incorporated into the document, and mitigations should be provided.
- The document measures noise levels at various points around the pool specifically when lap swimming is occurring and not during water polo practices, games or tournaments. Measuring noise

during periods of lap swimming does not accurately reflect the impact of CEQA on water polo games and tournaments. More rigorous sound testing should be conducted in other areas around Manzanita and beyond the tennis courts. I-6

The impacts of sound, light, usage, and noise have not been fully analyzed under CEQA.

- The document mentions that usage should not increase materially; however, projections in the same document indicate that energy demand will be 64% higher and solid waste generation will increase by 47%. These metrics suggest increased activity and significantly more people using the facility than currently observed. This requires further analysis and appropriate mitigation for sound, noise, traffic, and light issues.
- Previous documentation and presentations to the public indicate that this design primarily supports increased water polo activities, including high school, club, and other events. That documentation and statements by administration and board members have indicated the primary driver for the larger pool need relates to the significant growth in this sport so expansion is necessary to accommodate it.
- It has also been indicated that the high school men's team plays its games at other pools due to the current pool's limitations, and a new pool would support bringing these games back to the area.
- These factors increase activity in the pool space, boost noise levels, and impact other environmental factors that should be addressed in the document.
- Claiming there is no change contradicts your prior statements and is inaccurate. This section should be reviewed and updated accordingly to incorporate and reflect these considerations, with further mitigations (such as replacing fencing with a sound attenuating solid wall on the tennis court side of the pool similar to the design over the new stadium seating, adjusting the height of light poles, etc.) to address CEQA-related issues.
- Sound attenuation walls are needed around all sides of the pool to block noise.

I-7

The lighting environment analysis under CEQA is incomplete:

- The document overlooks potential light leakage from a larger scoreboard, despite CIF requirements related to bigger pool sizes and audience viewing capability.
- There is no mention of automatic light shut off or operating hours, seen in similarly close residential proximity as 8 am to 8pm.

I-8

Key factors have been omitted that are important elements under CEQA:

- While swimming is mentioned 42 times, polo, water polo, tournaments, and team usage times are omitted. These aspects are typically included in similar CEQA analyses and discussed in reports from other schools to mitigate environmental impacts and should be included for proper analysis.

I-9

Other CEQA-related Issues

Project Location is indicated as 625 Park Avenue but it should be 670 Park Avenue

- The school administration building is at 625 Park Avenue, while the current pool is at 670 Park Avenue, where the new pool is also expected to be located. It is important to clarify this, as the CEQA impact has been assessed for 670 Park Avenue.

I-10

Proposed project is surrounded by residential structures

- While CEQA does not have a set distance in feet from a project that it covers, as its scope is determined by the potential environmental impact of the project, not just its proximity certain standards are used.
- When notifying property owners, local jurisdictions often use a range of 300-500 feet from the project site to ensure adequate public awareness. The District reported it used 500 feet for this.
- Simple analysis using Google Earth finds there are at least 74 homes surrounding the proposed pool area from edge of pool that are as little as 35 feet up to 500 feet away (plus 2 schools of Anneliese + the high school campus; 1 hotel with 5 rooms and 1 church).
- This should be updated to indicate the project is surrounded by residential structures on ALL SIDES EXCEPT for the area along Park where the high school sits.

I-11

- Total area impacted includes homes on Virginia Park, Griffith, St Anns, Manzanita, Park, Skyline and La Vista (plus the schools, hotel and church). The document should be updated to include those areas and sound, light, and traffic mitigated further. I-11

Lighting - Light poles are discussed as being either 24 feet or 40 feet tall.

- The environmental impact from lighting needs clarification based on pole height and design. The taller height (40 feet) is more akin to what one would expect surrounding a football field, while the smaller height (24 feet) are more similar to what currently exists on neighboring tennis courts.
- Depending on the height and design of these, the environmental impact from light is unknown until that is clarified and cleaned up in the document. I-12

Pool Size / Increased Usage - Size goes from 25 meters to 45 meters, an 80% increase.

- The increased size will support simultaneous multiple practices and CIF-sponsored events, resulting in more people, traffic, and noise.
- These impacts need to be addressed properly in the document and rerouted for additional public input. I-13

Traffic and Wildfires – Recent fires in LA highlight the importance of traffic and wildfire mitigation, especially since Park Avenue is a major evacuation route near schools.

- Traffic flow and timing during the day need better addressing.
- Police presence for active traffic control is necessary.
- The movement of dump trucks between classes adds risk and should be mitigated. I-14

Analysis of Critical Evacuation Route on Park Avenue is Incomplete

- Park Avenue is crucial for evacuations, requiring police presence during construction for safety. Mitigation plans need to address these concerns. I-15

Hazardous Chemical Analysis Is Incomplete

- Roughly doubling the amount of acid and chlorine tanks on site given 80% increase in pool size should be reanalyzed and mitigated.
- Chemicals on hand are within 15 feet of a home and around kids at the school
- This should be better identified, addressed and mitigated I-16

Regards,
Steve Brown

Comment Letter J

The following is my response to the LAGUNA BEACH HIGH SCHOOL EXPANSION Initial Study and Mitigated Negative Declaration (IS/MND)

The following are observations of statements, actions, data and proposed mitigations contained in the document. Addressing some of the findings, in no particular order.

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or as a "Potentially Significant Unless Mitigation Incorporated," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agricultural & Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology / Soils	☐ GHG Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

J-1

Project Access and Parking

The development of the project may require a minor reduction in the number of existing parking spaces in the lot adjacent to the pool area from its current 15 spaces to seven with one ADA compliant stall.

There are currently 17 parking spaces and 2 ADA Spaces. This is actually a 60% reduction in standard parking spaces and a 50% reduction in ADA Parking Spaces. See the photos below.

17 Parking Spots + 2 ADA



The 2 Current ADA Spots



J-2

4.1 Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

J-3

d) Would the project create a new source of substantial light or glare which would

adversely affect day or nighttime views in the area?

Less Than Significant Impact

The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes. Construction and operation of the project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations (City of Laguna Beach, 2024c), which would be reviewed and approved by City staff to ensure that light and glare from project components would be less than significant.

The statements pertaining to light, reflection / glare are unsubstantiated, as there appear to be no tests, or measurements showing data to support.

See responses below:

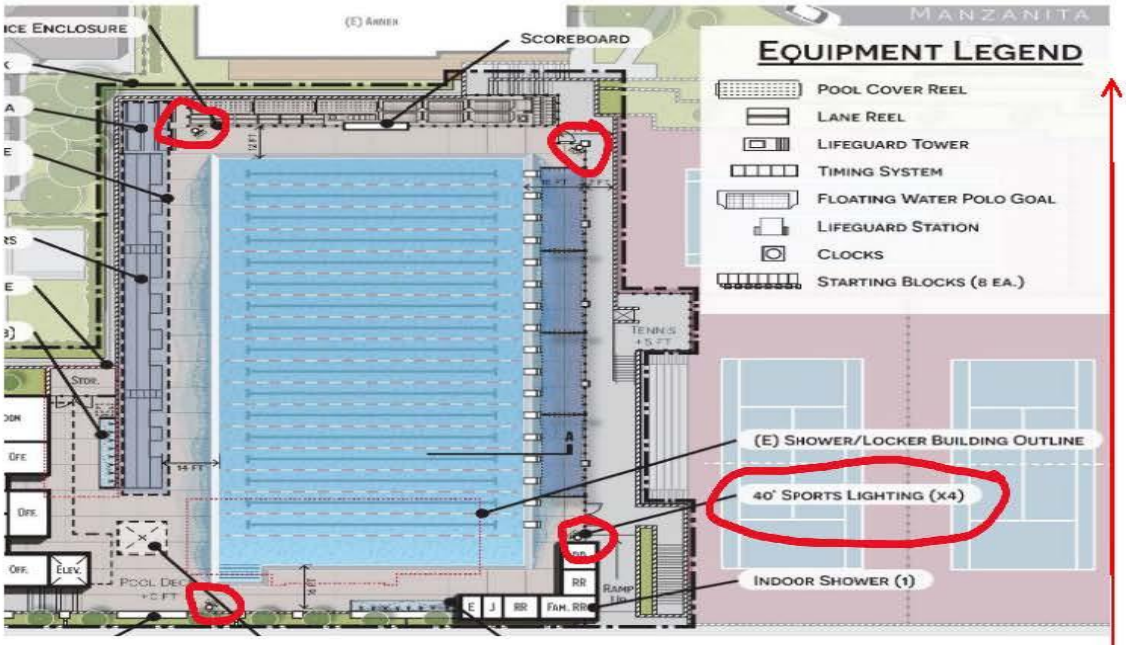
POOL LIGHTING

To provide lighting for the proposed project, a site lighting design consistent with the existing site light pole height at the existing pool and tennis court area (approximately 24'-0" in height) is being proposed.

J-4

This is conflicting information as the Proposed Plan Drawing Figure 3.3-3 calls out for 40' lights X 4. See below

Figure 3.3-3
PROPOSED SITE PLAN



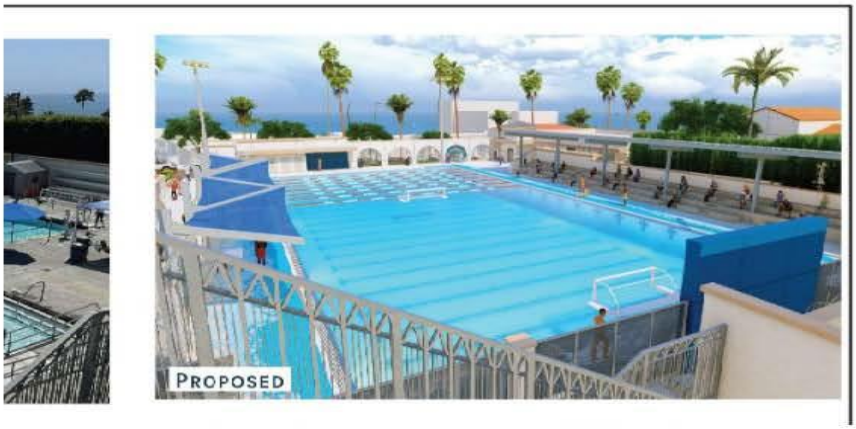
J-4

Solar water heating and solar photovoltaic panels. Solar water heating and solar photovoltaic panels are proposed on west, north, and east side of pool (as delineated in Figure 3.3-8) While shown in Figure 3.3-8,

This contradicts Figure 3.3-9, the Project Comparison View, where Solar Panels are not shown.

❖ SECTION 3.0 – PROJECT DESCRI

Figure 3.3-9
PROJECT COMPARISON VIEW



While the District states it will adhere to the City of Laguna Beach's "Good Neighbor Lighting Policy", The district's current action pertaining to lighting is not following the City Policy. See the photos below.

The District Sign at the corner of Legion, Park & Short St. that is illuminated 24-7. Years ago, this sign would shut off at 7 – 8:00 PM. After being updated several years ago with extra bright LEDs, the cut off time was eliminated. The district has ignored requests to remedy the situation. The light is very disruptive to a sleepy residential area and against the City Sign Ordinance and the City Good Neighbor Lighting Policy.







J-5

The scoreboard is often left on as ambient lighting. Note light leakage





Into the neighboring properties. See the Red reflection on palm trees.

Tennis court lighting continues to be illuminated long after players have left courts. Many times after 10:30 PM, despite several mentions and requests to change how the lights operate.

When the pool was moved into the current space from the school quad, the neighbors were promised no and low lighting, sound mitigation / restrictions and early stops to practices and events. None of which have been followed or recognized. These reasons, combined with the inconsistencies in the Mitigation document, bring a general distrust of the process.

4.3.5 Sensitive Receptors
Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants.
The nearest sensitive receptors to the project site include the portion of the Laguna Beach High School campus across the street and single-family residences about 25 feet away from the swimming facility.

There are many residents over the age of 65 years within the proximity of the pool project. This needs to be taken into consideration.

4.3.6 Applicable South Coast Air Quality Management District Rules
Rule 403 (Fugitive Dust Rule)
During construction, the project would be subject to SCAQMD Rule 403 (fugitive dust). SCAQMD Rule 403 does not require a permit for construction activities, per se; rather, it sets forth general and specific requirements for all construction sites (as well as other fugitive dust sources) in the SCAB. The general requirement prohibits a person from causing or allowing emissions of fugitive dust from construction (or other fugitive dust sources) such that the presence of such dust remains visible in the atmosphere beyond the property line of the emissions source.

J-6

Many of the above mentioned "Sensitive Receptors" over 65 years are downwind and could be adversely affected by fugitive dust and toxins.

Regional Operational Emissions
The project proposes the improvement and modernization of the existing pool facility located at Laguna Beach High School in Laguna Beach, California. Laguna Beach High School will have an enrollment of 750, serving grades 9 through 12 in Fall 2026 with an expected decrease in the future (LBUSD, 2023). The project would not increase student capacity at the school and would not involve temporary relocation of students or staff during construction. However, the facility improvements may increase the public's use of the pool area and may also attract more visitors during swim meets.

At this point, it is my understanding that the City and the District do not have an agreement in place for future use just yet and certainly not in January 2025.

4.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X

J-7

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Less than Significant Impact
The construction and operation of the project may involve the use of small amounts of hazardous materials such as fuels, lubricants, solvents, and fertilizers. Hazardous materials would be used, transported and disposed of in accordance with existing regulations of several agencies, including the US Environmental Protection Agency; US Department of Transportation; Department of Toxic Substances Control; Occupational Safety and Health Administration; and Division of Occupational Safety and Health. Construction impacts involving hazardous materials would be less than significant after compliance with such regulations.

It seems that the above statement is only applicable to the construction aspects pertaining to hazardous materials and chemicals. There is no mention of the typical chemicals used in pool operations and maintenance. Typical hazardous materials used include chlorine, perlite, and muriatic acid. There is no mention how the transportation and handling of these materials would mitigate any potential hazard.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable disturbance and accident conditions that involve the release of hazardous materials into the environment?

The ERR concluded that there were no hazardous materials sites on or adjacent to the project site (NETROnline, 2024). The construction contractor would maintain supplies and equipment to contain and clean up small spills of hazardous materials during construction and maintenance. Workers would be trained in their

proper use. In the event of a release of hazardous materials of toxicity and/or quantity that onsite personnel could not safely contain and clean up, the construction contractor would immediately notify the Hazardous Materials and Waste Branch of the Orange County Environmental Health Division, which is responsible for emergency responses to hazardous materials releases in Orange County. Therefore, the construction of the project would have a less than significant impact.

Again, no mention of the "Operation" of the pool and any details pertaining to the mitigation of potential accidents. No description of what quantity of the chemicals will be stored on site and how. Capacity of tanks to hold the chemicals and no description of the process should there be a Chemical spill within the pump room, etc.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
Less than Significant Impact

Tony Tobin Elementary School is located approximately 0.25 miles east of the project site (Google Earth Pro, 2024). No other schools are within a radius of 0.25 miles of the project.

J-8

This school is nowhere near Laguna Beach. Obviously, a cutting and pasting of information.
Annalise Pre-School is 1 block away and of course the pool is being built on LBHS property.

Construction
Project construction would involve use of small amounts of hazardous materials such as fuels, lubricants and fertilizers. Such materials would be used in accordance with existing regulations of several agencies. The use of such materials onsite would not pose substantial hazards to persons at Tony Tobin Elementary School.
Operation
Project operations would involve handling small amounts of hazardous materials, such as cleaners, solvents, and fertilizers. However, these materials would not be stored on site and would be handled and disposed of according to applicable regulations and would not be used or stored in amounts that would pose a hazard to people at Tony Tobin Elementary School. Therefore, the project would have a less than significant impact in this regard.

While Operations are mentioned, the actual pool chemicals are not. Again no information on storage, etc.

Table 4.9-1
CORTESE SITES ON AND WITHIN 0.5 MILE OF THE PROJECT SITE

Site Name Address Distance and Direction from project site	Additional information
Monte Verde Road/Via Pascal 45585 El Chimisal Road Opposite Via Pascal from east end of project site	School Investigation Site Denha High School AKA High School No. 3 No action required in 2001
Monte Verde Road/Via Pascal 45585 El Chimisal Road Opposite Via Pascal from the from the east end of the project site	School Investigation Site Morgan Hill Elementary No action required 2002

Source: NETROnline, 2024. See **Appendix F.**

The Cortese sites noted above are not within .5 Miles of the project site.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The nearest public-use airport to the project site is the French Valley Airport, approximately eight miles northwest of the project location (see Figure 4.9-1). The project site is outside of the French Valley Airport zones, where land uses are regulated to minimize aviation-related hazards to people on the ground and outside of the noise compatibility contours of the airport. The implementation of the project would not cause airport-related hazards or excessive noise to people on the project site. No impact would occur.

French Valley Airport is in Riverside County. Another example of cutting a pasting information.

J-9

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact

The water quality control plan in effect for the project region is that issued by the San Diego Regional Water Quality Control Board in 2021. The District would comply with the water quality control plan through use of storm drain catch basins with insert filters. The project site is not over a groundwater basin and thus no sustainable groundwater management plan is in effect for the project site and surrounding area. No adverse impact would occur.

The project is not under the water quality control plan of the San Diego Regional Water Quality Control Board.

NOISE

4.13.3 Existing Noise

The City of Laguna Beach General Plan Noise Element lists "noise sensitive receptors,"[21] which include, but are not limited to, areas containing schools, hospitals, rest homes, long-term medical or mental care facilities, or any other land use deemed noise sensitive by the local jurisdiction (City of Laguna Beach, 2005b). Additionally, the City's municipal code has applicable noise standards in regard to construction noise (City of Laguna Beach Municipal Code, 2005). The closest sensitive receptors to the project site include the single-family neighborhoods directly north, east, and northeast of the project site; The Church of Jesus Christ of Latter-day Saints west of the project site; and Manzanita Cottages Hotel west of the project site (Google Earth Pro, 2021). Laguna Beach High School is also considered an offsite sensitive receiver, so construction noise exposure levels at the nearest building, a library, were also taken into account. Sensitive receptors are shown in **Figure 4.13-1**. **Table 4.13-1** summarizes information about representative sensitive receivers.

It is unrealistic to not include several more locations that are in direct line of sound under "Sensitive Noise Receivers". This list must be expanded to get an actual accurate measurement of sound in affected areas.

Table 4.13-1
SENSITIVE NOISE RECEIVERS IN PROJECT AREA

Description	Location	Distance From Site Boundary	Nearest Ambient Sampling Point[b]
The Church of Jesus Christ of Latter-day Saints	682 Park Avenue	16 feet	1
Single-family Residence	721 Manzanita Drive	56 feet	2
Single-family Residence	809 Manzanita Drive	24 feet	3
Single-family Residence	820 Park Avenue	24 feet	4
Laguna Beach High School Library	625 Park Avenue	60 feet	None

[a]These are not necessarily the distances used in the construction noise calculations. See Section 4.13.6.
[b]See Figure 4.13-2 for locations of ambient noise sampling points.

On November 6 and 15, 2024, UltraSystems obtained 15-minute ambient noise level samples at four offsite locations in the general area of the project. Sampling locations are shown in **Figure 4.13-2** (see **Appendix G**). At the request of LBHS staff, the offsite sampling was coordinated with sampling in the immediate vicinity of the pool during active use of the facility. J-10

The "noise sampling" taken on the two separate days are vastly incomplete. They were taken during swim times only and apparently with mostly lap swimming. NO High School water polo, NO youth programs, or actual High School swim meets or Water Polo games. This is a check the box move in order to skew the results to lower sound readings. Not a complete examination of one of the most critical mitigations for this entire project.

The "samplings" were taken from some very non-direct locations. One on the opposite side of elevated homes some 30' below the foundation level of the houses. Others a distance again much lower than the pool and not in line of sound. Again this appears to be a suspect action to not obtain true, pertinent and accurate results.

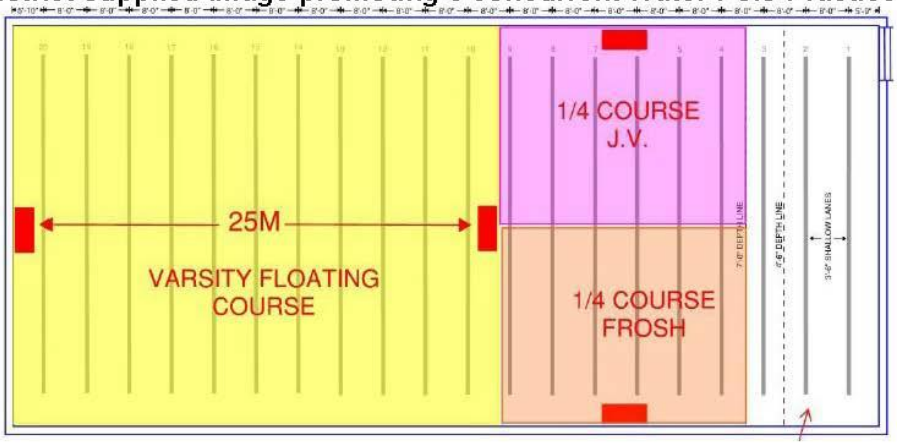
Operational Noise
Onsite
Onsite noise sources from the proposed pool renovation project would include operation of mechanical equipment such as air conditioners, lawnmowers, leaf blowers, and building maintenance equipment; and motor vehicles accessing, driving on, and exiting the parking lot. Noise levels associated with operation of the project are expected to be comparable to those of nearby residential areas. Since this is a pool replacement project, frequency of use, number of attendees, and additional sounds associated with water recreation are not expected to change. Therefore, noise from onsite sources would be less than significant.

First off, leaf blowers are illegal in Laguna Beach.

Secondly, the above statement is false and an attempt to alter the impact of this pool expansion.
As stated, the sound readings were not complete and did not measure the complete use of the current pool.

Nowhere in this document is Water Polo mentioned. That is the single most promoted reason for the expansion of this pool in countless meetings and documents. The need for a three team practice was shown below, which will bring two additional teams to the pool at the same time.

District supplied image promoting 3 concurrent Water Polo Practices



J-11

In fact, the increased number of attendees in the pool has been promoted from the start.

- *Three concurrent Water Polo practices will be in the pool as it's been claimed only one team can practice at a time now.*
- *Expanded use by the Cross Country Team*
- *Expanded use by the Track Team*
- *Expanded use by the Baseball Team*
- *Expanded use by the Soccer Team*
- *Expanded use by U 12 Girls Water Polo*
- *Expanded use by U 18 Girls Water Polo*

The statement that use will not increase is absolutely incorrect. Data and information from district say just the opposite.

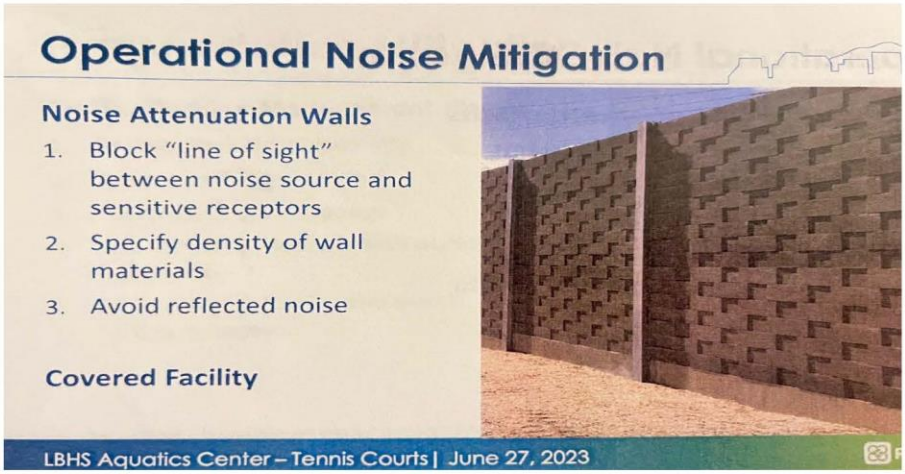
SOUND MITIGATION

Sound mitigation has been stated and discussed many times including at the CEQA process overview. Including the following:

J-12

Unapproved Audio
Prohibit Airhorns
Boisterous activity on exit
Foot stomping on bleachers

In addition, there were examples of Noise Attenuation Walls.



J-12

None of these were discussed in the document. This is a very important mitigant that needs to be added to the plan.

TRAFFIC SAFETY

Morning and afternoon traffic around the High School is slow moving on a daily basis. Adding this construction without better planning will cause unbearable gridlock and cause safety issues. Student walking and driving safety will be challenging and dangerous.

In addition, traffic will cause a very dangerous emergency escape route problem. Park Avenue is one of the major escape routes from Top Of The World.

J-13

Mitigated Negative Declaration Document Challenges

This document is riddled with what seems to be incomplete studies and data. There are several mistakes and use of cut and paste in several areas which does not instill confidence in the validity of the content.

There are several Appendix called out but were not attached or found.

J-14

The Postcard announcing the NOTICE OF INTENT TO ADOPT, was postmarked on 1/21/25. On that card it states that 1/17/25 is the start of the time to respond. Mailing the card out 4 days after the start is not good. Again, another question of the authenticity of the process.

I believe that with the lack information, the mistakes, missing details and the poor timing of the notification card, this process needs a correction and a restart.

J-15

Please feel free to contact me with any questions.

Steve McIntosh
stevemcintosh@cox.net

Comment Letter K

From: **Ann Gamerl** <agamerl@yahoo.com>
Date: Fri, Feb 14, 2025 at 9:38 AM
Subject: Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651
To: ewahlstromrogers@lbusd.org <ewahlstromrogers@lbusd.org>

Hi Elia,
We have many questions regarding the above subject and hope that you can help us understand some of what is in the proposed document. It appears that there are some fundamental flaws and inconsistencies that we'd like to have addressed.

For example,
The project is listed at both 625 and 670 Park Ave. The description of surrounding structures omits the residences to the north. The pool dimensions are conflicting, the reduction in parking stalls - is it 7 or 5? not to mention the egregious error of referring to the school as Centennial High School, instead of Laguna Beach High School, which suggests a lack of diligence and thoroughness of the entire study.

I would like to see these concerns addressed along with the Energy use mitigation, Water use, Noise pollution and parking.

Thank you
Ann Gamerl

K-1

Comment Letter L

From: **Patricia Halman-Menne** <patmenne@gmail.com>
Date: Fri, Feb 14, 2025 at 12:58 AM
Subject: LBHS Pool Modernization Project - Mitigated Negative Declaration
To: ewahlstromrogers@lbusd.org <ewahlstromrogers@lbusd.org>

I strongly OBJECT to the proposed LBUS Modernization Project :
1. Too Aggressive of a plan - This program is far too dense for the existing site in question.
2. Increased Noise Impacts will be a negative influence for the immediate surrounding residential neighborhood, including the adjacent hilly neighborhood 1/8 -1/4 mile away as the noise will be amplified up the hill.
3. Loss of Real Estate Asset Values (approx. millions of dollars) to all the residential properties within the immediate Park Ave location and surrounding 1000 foot radius of properties. Due to increased Noise, traffic and congestion impacts.
4. Declining student population - does not warrant this increased size of the pool area - especially for the less than 100 students that are in the aquatics programs.

L-1

Patricia Halman-Menne
Laguna Beach Resident and Property Owner
949-246-6182

3.0 ERRATA

The following clarifications and modifications are intended to update the IS/MND in response to the comments received during the public review period. These changes are incorporated into the IS/MND, to be presented to the Laguna Beach Unified School District for adoption and project approval. None of these changes to the IS/MND represent a substantial change to the proposed project that would alter the conclusions reached in the IS/MND. Revisions made to the IS/MND have not resulted in the identification of new significant impacts requiring mitigation measures, nor has the severity of a previously identified impact increased. Pursuant to CEQA Guidelines Section 15073.5, none of the CEQA criteria for recirculation have been met, and recirculation of the MND is not warranted.

Page #	Clarification/Modification
Page 1	In the original Draft IS/MND, an exhibit introduced on page 1 of the Introduction specified a 50-meter pool. However, the intended size as stated is a 45-meter by 25-yard pool. This measurement has been revised to accurately reflect the correct length of 45 meters. However, the revision does not change the conclusions of the IS/MND.
Page 6	Figure 3.3-3 originally depicted 40-foot light poles, leftover from an earlier submission. This figure has been revised to reflect the latest planning updates. Additionally, details regarding the proposed lighting height of 24 feet have been incorporated into Figure 3.3-9 and Section 3.3.5. However, the revision does not change the conclusions of the IS/MND.
Page 4.9-2	There was an error in the Draft IS/MND related to the nearest public school to the project site. Originally, Tony Robins Elementary School was listed; however, this information is inaccurate. The correct school serving as the nearest educational institution to the project location is Anneliese Schools - Manzanita Elementary School, which has now replaced Tony Robins Elementary School. However, the revision does not change the conclusions of the IS/MND.
Page 4.9-3	There was an error in the Draft IS/MND regarding the proximate airport to the project site. French Valley Airport is not the nearest airport. John Wayne Airport (SNA) is now correctly identified as the closest airport to the project location. However, the revision does not change the conclusions of the IS/MND.
Page 4.19-2	The IS/MND document initially misidentified Centennial High School; this error has been rectified to accurately reflect Laguna Beach High School instead. However, the revision does not change the conclusions of the IS/MND.
Page 4.19-4	The IS/MND initially made an error in identifying Waste Management as the contracted waste hauler. It has been amended to clarify that, "The District contracts with an outside vendor to collect and dispose of the District's solid waste." However, the revision does not change the conclusions of the IS/MND.
Section 4.13	The descriptions of activities at the pool during the November 15, 2024, sampling inadvertently did not mention that water polo activities were also observed. The noise measurement technician did mention: • Music in the background playing with a large speaker • Water polo team practice in session

	• Claps from audience • Loud cheers, whistle blowing, coach/referee yelling • Team yelling, water splashing, loud horn A new analysis of the poolside noise measurement data indicates that the average noise levels during water polo activities are 11.1 dBA Leq higher than during just swimming. The IS/MND was revised to include this information. In addition, UltraSystems estimated future noise exposures at seven sensitive receivers, for both expanded swimming activity and a water polo match. Section 4.13 of the IS/MND has been revised to include this information. However, the revision does not change the conclusions of the IS/MND.

4.0 FINAL MITIGATION MONITORING AND REPORTING PROGRAM

The Final Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with § 21081.6 of the Public Resources Code and § 15097 of the CEQA Guidelines, which requires all state and local agencies to establish monitoring or reporting programs whenever approval of a project relies upon a MND or an EIR. The MMRP ensures implementation of the measures being imposed to mitigate or avoid the significant adverse environmental impacts identified through the use of monitoring and reporting. Monitoring is generally an ongoing or periodic process of project oversight; reporting generally consists of a written compliance review that is presented to the decision-making body or authorized staff person.

It is the intent of the MMRP to: (1) provide a framework for document implementation of the required mitigation; (2) identify monitoring/reporting responsibility; (3) provide a record of the monitoring/reporting; and (4) ensure compliance with those MMs that are within the responsibility of the LBUSD to implement.

The following table lists impacts, mitigation measures adopted by the Board of Education in connection with approval of the proposed project, level of significance after mitigation, responsible and monitoring parties, and the project phase in which the measures are to be implemented.

Only those environmental topics for which mitigation is required are listed in this Mitigation Monitoring and Reporting Program.

Table 4.0-1
FINAL MITIGATION MONITORING AND REPORTING PROGRAM

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
4.4 Biological Resources				
Threshold 4.4 a): Would the projects have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	**MM BIO-1: Pre-Construction Breeding Bird Survey** To maintain compliance with the MBTA and Fish and Game Code, and to avoid impacts to or take of migratory non-game breeding birds, their nests, young, and eggs, the following measures will be implemented. The measures below will minimize or avoid direct and indirect construction-related impacts to migratory non-game breeding birds to less than significant levels. a) Project activities that will remove or disturb potential nest sites (e.g., open ground, trees, shrubs, grasses, or burrows) during the breeding season (typically from February 15 through September 15, but can vary slightly from year to year, usually depending on weather conditions) will be scheduled outside the breeding bird season to avoid potential direct impacts to breeding birds protected by the MBTA and Fish and Game Code. Necessary removal of trees, shrubs, etc. that could potentially serve as nest sites will prevent birds from nesting within the project site during the breeding season and during construction activities. b) If project activities cannot be avoided from February 15 through September 15, a qualified biologist will conduct a pre-construction breeding bird survey for breeding birds and active nests or potential nesting sites within the limits of project disturbance. The survey will be conducted at least seven days prior to the onset of scheduled activities, such as mobilization and staging. It will end no more than three days prior to vegetation, substrate, and structure removal and/or disturbance. c) If special-status bird species are observed within the project site during the pre-construction survey, the biologist will immediately map the area and notify the appropriate resource agency to determine suitable protection measures and/or mitigation measures and determine if	Project Applicant Qualified Biologist	Field Verification	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	additional surveys or focused protocol surveys are necessary. Project activities may begin within the area once concurrence is received from the appropriate resource agency. d) If a breeding bird territory or an active bird nest is located during the pre-construction survey and would be impacted by project activities, the site(s) will be mapped on engineering drawings and a no-activity buffer zone will be marked (fencing, stakes, flagging, orange snow fencing, etc.) a minimum of 100 feet in all directions for passerines and 500 feet in all directions for raptors. The biologist will determine the appropriate buffer size based on the type of activities planned near the nest and the species of bird that created the nest. This no-activity buffer zone will not be disturbed until a qualified biologist has determined that the nest is inactive, the young are no longer being fed by the parents, the young have fledged, the young have left the area, or the young will no longer be impacted by project activities. Periodic monitoring by a biologist will be performed to determine when nesting cycle is complete. Once the nesting cycle has finished, project activities may begin within the buffer zone(s). e) Birds or their nests will not be disturbed, captured, handled, or moved. Active nests cannot be removed or disturbed. Inactive nests can be removed or disturbed by a qualified biologist if the nest is determined to be inactive. f) If no breeding birds or active nests are observed during the pre-construction surveys, or they are observed but will not be impacted, project activities may begin, and no further mitigation will be required.			
Threshold 4.4 d): Would the project interfere substantially with the movement of any native resident	**MM BIO-2: General Avoidance and Minimization** The following general avoidance and minimization measures should be implemented to reduce potential impacts to wildlife (and vegetation), to the extent practical: a) To minimize construction-related mortalities of nocturnally active species such as mammals and snakes, it is recommended that all	Project Applicant Project Contractor	Field Verification	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	non-emergency work be conducted during daylight hours. All unnecessary lights would be turned off at night to avoid attracting wildlife such as insects, migratory birds, and bats. Nighttime work (and use of artificial lighting) would not be permitted unless specifically authorized. b) Equipment maintenance, lighting, and staging will occur only in designated areas, and will not block or impede movement through wildlife corridors. c) Contractors, subcontractors, employees, and site visitors would be prohibited from feeding or leaving trash onsite that might attract wildlife. d) All steep-walled pitfalls (trenches, holes, bores, and other excavations) greater than two feet deep used during the project would be completely covered at all times except when being actively used, to prevent wildlife entrapment (i.e., reptiles and small mammals). If trenches cannot be covered, escape ramps (maximum slope of 2:1) will be provided to allow trapped animals to escape exclusion or fencing shall be installed around the trench or excavation. Trenches shall be inspected immediately before backfilling and wildlife removed. e) All onsite project workers shall look under their vehicles and equipment before movement. If wildlife is observed, no vehicles or equipment shall be moved until the animal has left the area voluntarily or can be legally relocated. f) Equipment maintenance, lighting, and staging will occur only in designated areas, and will not block or impede movement through wildlife corridors.			3. During construction activities
4.5 Cultural Resources				
Threshold 4.5 b): Cause a substantial adverse change in the significance of an archaeological	**MM CUL 1** If archaeological resources are discovered during construction activities, the contractor will halt construction activities in the immediate area and notify the District. The project applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for	Qualified Archaeologist Project Contractor	Field Verification	1. Laguna Beach Unified School District

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
resource pursuant to § 15064.5.	Archaeology who will be notified and afforded the necessary time to recover, analyze, and curate the find(s). The qualified archaeologist will recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A L) form and filed with the Eastern Information Center. Construction activities may continue on other parts of the project site while evaluation and treatment of prehistoric archaeological resources takes place.			2. Laguna Beach Unified School District 3. During construction activities
Threshold 4.5 c): Would the project disturb any human remains, including those interred outside of formal cemeteries.	**MM CUL 2** If human remains are encountered during excavations associated with this project, all work will stop within a 30 foot radius of the discovery and the Orange County Coroner will be notified (§ 5097.98 of the Public Resources Code). The Coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the NAHC. The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLD (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).	Project Contractor Orange County Coroner	Field Verification	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities
4.7 Geology and Soils				
Threshold 4.7 f): Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	**MM GEO-1** Prior to the issuance of building/grading permit, the project applicant shall retain a qualified paleontologist, to remain on-call during project ground-disturbing activities. If paleontological resources are uncovered during project construction, the contractor shall halt construction activities within 50 feet of the find and notify the District. The on-call paleontologist shall be notified and afforded the necessary time and funds to recover, analyze, and curate the find(s). The paleontologist shall curate the find(s) at an accredited repository for paleontological resources such as Western Science Center.	Project Applicant Qualified Paleontologist Project Contractor	Monitoring Assessment Recovery Curation	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	Subsequently, the monitor shall remain onsite for the duration of the ground disturbance to ensure the protection of any other resources that are found during construction on the project site.			
4.18 Tribal Cultural Resources				
Threshold 4.18 b): Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be a significant resource to a California Native American tribe pursuant to the criteria set forth in subdivision (c) of Public Resource Code § 5024.1(c)?	**MM TCR-1** [Prior to the commencement of any ground-disturbing activity at the Project Site, the District shall retain a Native American monitor. The Native American monitor shall be selected from a tribe that has requested that a monitor be present (including the Gabrieleño Band of Mission Indians – Kizh Nation and Juaneño Band of Acjachemen Indians – Belardes), and in which the Project Site is within their ancestral region of occupation. The Native American monitor shall only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined as activities that may include, but are not limited to, grubbing, tree removals, boring, grading, soil excavation, drilling, and trenching. The Native American monitor shall complete daily monitoring logs that shall provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Native American monitor has indicated that all upcoming ground-disturbing activities at the Project site have little to no potential for impacting tribal cultural resources.	Project Applicant Native American Monitor	Monitoring	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. Prior to construction activities
	MM TCR 2 In the event tribal cultural resources are discovered during Project construction, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. All tribal cultural resources unearthed by Project activities shall be evaluated by the Native American monitor and the Qualified Archaeologist. If the tribal cultural resources are also historical resources or unique archaeological resources, the affected tribe, District, and Qualified	Native American Monitor Project Contractor Qualified Archeologist	Monitoring Assessment Recovery Curation	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	Archaeologist will confer on the final disposition of the resource(s), which may include onsite reburial, curation at a public, non-profit institution, or donation to the affected tribe. If the tribal cultural resources are not also historical resources or unique archaeological resources, the affected tribe will retain it/them in the form and/or manner the tribe deems appropriate, for educational, cultural and/or historic purposes. Work may continue in other parts of the Project site while evaluation and any required recovery activities take place. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis.			
	MM TCR 3 The Gabrielino-Tongva tribe shall be informed if TCRs are discovered during ground disturbance construction work at the project site. The District will inform the tribe if this should occur	Project Applicant	Inform Tribe	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities
	MM TCR-4: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial). a) Upon discovery of any tribal cultural resources (TCRs), all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Native American Monitor. The Tribe or Tribal monitoring agency will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion,	Native American Monitor Project Contractor Qualified Archaeologist	Field Verification	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities

TOPICAL AREA IMPACT	MITIGATION MEASURE	RESPONSIBLE PARTY	MONITORING ACTION	1. ENFORCEMENT AGENCY 2. MONITORING AGENCY 3. MONITORING PHASE
	and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.			
	MM TCR-5: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects. a) Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute. b) If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed. c) Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). d) Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. e) Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.	Native American Monitor, Project Contractor Qualified Archaeologist	Monitoring Preservation	1. Laguna Beach Unified School District 2. Laguna Beach Unified School District 3. During construction activities

Additional Note: Community members have requested a sound barrier to address their concerns from previous engagements. While the analysis in the Initial Study/Mitigated Negative Declaration (IS/MND) indicates that noise impacts would be less than significant, the District has indicated willingness to respond favorably to the request. The inclusion of a noise dampening wall as a design feature may, therefore, be considered by decision makers. Should the decision-makers choose to move forward, the design feature may be included in this MMRP as a condition of project approval. The recommended language, subject to modification by the decision-makers, is as follows:

The final project design will include replacing the existing chain-link fence between the pool area and the tennis courts with a permanent sound barrier. A professional acoustical engineer will determine the required insertion loss to prevent significant noise impacts from occurring; the analysis should consider the frequency of major water polo noise sources, such as whistles and shot clock horns. Consideration will be given to using the tennis court surface as a base for the barrier, taking advantage of the elevation differential between the tennis courts and the pool deck. In addition, use of an angled canopy of sound attenuating material on the west side of the barrier should be considered.

ATTACHMENTS

ATTACHMENT A: NOTICE OF INTENT

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC HEARING

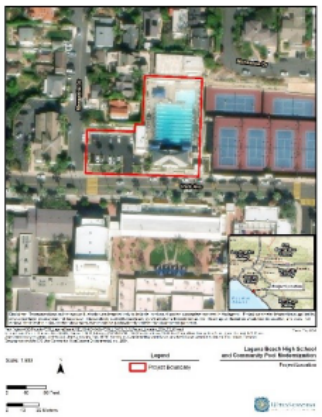
In compliance with Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132) and the federal rules and regulations adopted in implementation thereof, the Agenda will be made available in appropriate alternative formats to persons with a disability. Should you need special assistance to participate in this meeting, please contact the Business Department. Notification 48 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to this meeting.

A PUBLIC HEARING HAS BEEN SCHEDULED FOR THE FOLLOWING:

Laguna Beach High School Pool Modernization Project

The Laguna Beach School Unified School District (District) is processing a series of actions that would ultimately allow for the redevelopment and modernization of the Laguna Beach High School pool facility. The project will include demolition, excavation, grading, drainage, and building construction to replace the current pool with a new pool in the same location to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building.

Environmental Determination:	A Mitigated Negative Declaration (MND) has been prepared pursuant to Section 15070 of the California Environmental Quality Act and per Section 6.04 of the 2020 Local Guidelines for Implementing the California Environmental Quality Act.
Location:	670 Park Avenue in the City of Laguna Beach
Date of Hearing:	March 13, 2025
Place of Hearing:	Thurston Middle School 2100 Park Avenue Laguna Beach, CA 92651
Time of Hearing:	6:00 PM



Should you have any questions concerning this project, please contact Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The period for comment regarding the Mitigated Negative Declaration for this project is from **January 17, 2025** to **February 17, 2025**. The Initial Study and proposed Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651 and online at https://www.lbusd.org/departments/facilities/bids-and-public-notices. Please submit your comments via email to Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The project site is not listed as a hazardous waste site described in any lists as enumerated under Section 65962.5 of the Government Code.

ANY INTERESTED PARTY MAY APPEAR AND PRESENT ANY INFORMATION WHICH MAY BE OF ASSISTANCE TO THE DISTRICT. A COPY OF THE APPLICATION AND ENVIRONMENTAL DOCUMENTATION IS AVAILABLE FOR INSPECTION IN THE BUSINESS DEPARTMENT.

IF YOU CHALLENGE IN COURT ANY ACTION TAKEN CONCERNING A PUBLIC HEARING ITEM, YOU MAY BE LIMITED TO RAISING ONLY THOSE ISSUES YOU OR SOMEONE ELSE RAISED AT THE PUBLIC HEARING DESCRIBED IN THIS NOTICE, OR IN WRITTEN CORRESPONDENCE TO THE DISTRICT AT, OR PRIOR TO, THE PUBLIC HEARING.

Publish: January 17, 2025

ATTACHMENT B: ORANGE COUNTY CLERK/RECORDER NOI POSTING/RECORDING

ORANGE COUNTY
CLERK-RECORDER
CEQA FILING COVER SHEET

THIS SPACE FOR CLERK'S USE ONLY

Complete and attach this form to each CEQA Notice filed with the County Clerk-Recorder

TYPE OR PRINT CLEARLY

Project Title

LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION PROJECT

Check Document being Filed:

- ○ Environmental Impact Report (EIR)
- ○ Mitigated Negative Declaration (MND) or Negative Declaration (ND)
- ○ Notice of Exemption (NOE)
- ◉ Other (Please fill in type): Posting

FILED IN THE OFFICE OF THE ORANGE
COUNTY CLERK-RECORDER ON January 23, 2025
Posted for 30 days

DEPUTY JR

Filing fees are due at the time a Notice of Determination/Exemption is filed with our office.For more information on filing fees and No Effect Determinations, please refer to California Code of Regulations, Title 14, section 753.5.

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC HEARING

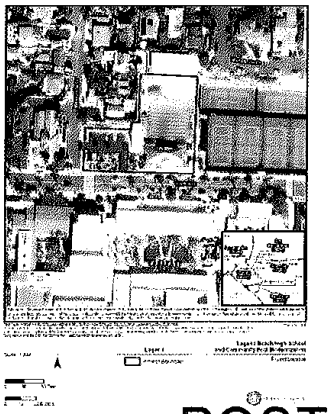
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A PUBLIC HEARING HAS BEEN SCHEDULED FOR THE FOLLOWING:

Laguna Beach High School Pool Modernization Project

The Laguna Beach School Unified School District (District) is processing a series of actions that would ultimately allow for the redevelopment and modernization of the Laguna Beach High School pool facility. The project will include demolition, excavation, grading, drainage, and building construction to replace the current pool with a new pool in the same location to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building.

Environmental Determination:	A Mitigated Negative Declaration (MND) has been prepared pursuant to Section 15070 of the California Environmental Quality Act and per Section 6.04 of the 2020 Local Guidelines for Implementing the California Environmental Quality Act.
Location:	670 Park Avenue in the City of Laguna Beach
Date of Hearing:	March 13, 2025
Place of Hearing:	Thurston Middle School 2100 Park Avenue Laguna Beach, CA 92651
Time of Hearing:	6:00 PM



POSTED

JAN 2 3 2025

ORANGE COUNTY CLERK-RECORDER DEPARTMENT

BY:_____DEPUTY

Should you have any questions concerning this project, please contact Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The period for comment regarding the Mitigated Negative Declaration for this project is from **January 17, 2025** to **February 17, 2025**. The Initial Study and proposed Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651 and online at https://www.lbusd.org/departments/facilities/bids-and-public-notices. Please submit your comments via email to Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org. P# 949-497-7700 Ext 5213

The project site is not listed as a hazardous waste site described in any lists as enumerated under Section 65962.5 of the Government Code.

ANY INTERESTED PARTY MAY APPEAR AND PRESENT ANY INFORMATION WHICH MAY BE OF ASSISTANCE TO THE DISTRICT. A COPY OF THE APPLICATION AND ENVIRONMENTAL DOCUMENTATION IS AVAILABLE FOR INSPECTION IN THE BUSINESS DEPARTMENT.

IF YOU CHALLENGE IN COURT ANY ACTION TAKEN CONCERNING A PUBLIC HEARING ITEM, YOU MAY BE LIMITED TO RAISING ONLY THOSE ISSUES YOU OR SOMEONE ELSE RAISED AT THE PUBLIC HEARING DESCRIBED IN THIS NOTICE, OR IN WRITTEN CORRESPONDENCE TO THE DISTRICT AT, OR PRIOR TO, THE PUBLIC HEARING.

Publish: January 17, 2025

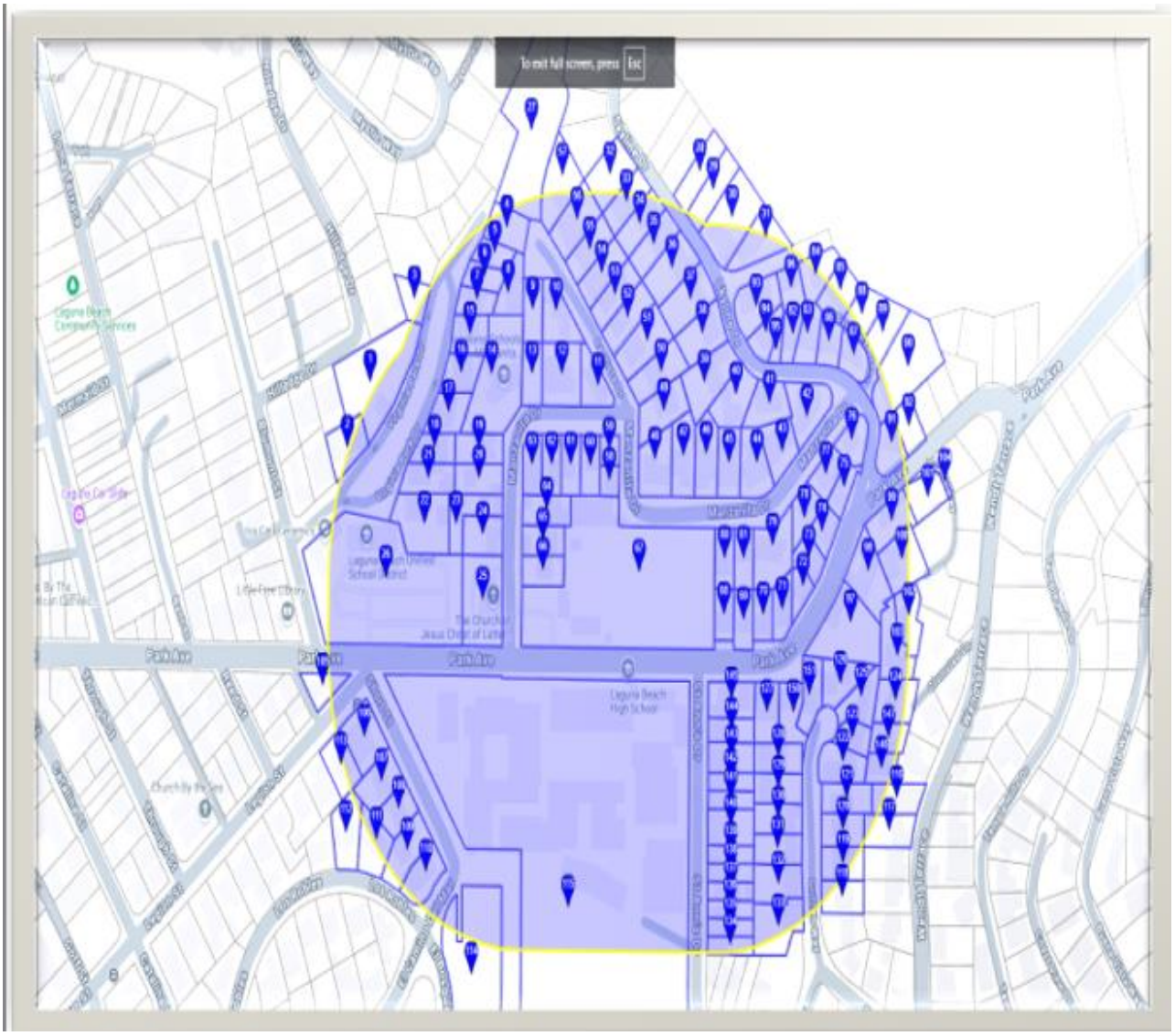
POSTED

JAN 2 3 2025

ORANGE COUNTY CLERK-RECORDER DEPARTMENT

BY: _____ DEPUTY

ATTACHMENT C: MAP OF NOI MAILING RECIPIENTS



ATTACHMENT C: NOTICE OF INTENT POSTCARD MAILER

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

LAGUNA BEACH CA 926
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01/21/2025 ZIP 92653
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US POSTAGE

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC HEARING

In compliance with Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132) and the federal rules and regulations adopted in implementation thereof, the Agenda will be made available in appropriate alternative formats to persons with a disability. Should you need special assistance to participate in this meeting, please contact the Business Department. Notification 48 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to this meeting.

A PUBLIC HEARING HAS BEEN SCHEDULED BEFORE THE PLANNING COMMISSION OF THE CITY OF LAGUNA BEACH FOR THE FOLLOWING:

Laguna Beach High School
Pool Modernization Project

The Laguna School Unified School District (District) is processing a series of actions that would ultimately allow for the redevelopment and modernization of the Laguna High School pool facility.

To:

,

The project will include demolition, excavation, grading, drainage, and building construction to replace the current pool with a new pool in the same location to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building.



Environmental Determination	A Mitigated Negative Declaration (MND) has been prepared pursuant to Section 15070 of the California Environmental Quality Act and per Section 6.04 of the 2020 Local Guidelines for Implementing the California Environmental Quality Act.
Location	670 Park Avenue in the City of Laguna Beach
Date of Hearing	March 13, 2025
Place of Hearing	Thurston Middle School 2100 Park Avenue Laguna Beach, CA 92651
Time of Hearing	6:00 PM

Should you have any questions concerning this project, please contact Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The period for comment regarding the Mitigated Negative Declaration for this project is from January 17, 2025 to February 17, 2025. The Initial Study and proposed Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651 and online at https://www.lbusd.org/departments/facilities/bids-and-public-notices. Please submit your comments via email to Elia Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The project site is not listed as a hazardous waste site described in any lists as enumerated under Section 65962.5 of the Government Code.

ANY INTERESTED PARTY MAY APPEAR AND PRESENT ANY INFORMATION WHICH MAY BE OF ASSISTANCE TO THE DISTRICT. A COPY OF THE APPLICATION AND ENVIRONMENTAL DOCUMENTATION IS AVAILABLE FOR INSPECTION IN THE BUSINESS DEPARTMENT.

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Publish: January 17, 2025

ATTACHMENT D: ORANGE COUNTY REGISTER PROOF OF PUBLICATION

THE ORANGE COUNTY
REGISTER
1920 Main Street, Suite 209
Irvine, California 92614
(714) 796-7000
legals@inlandnewspapers.com

Laguna Beach USD
5050 Blumont Street
Laguna Beach, California 92651

Account Number:	5192370
Ad Order Number:	0011714622
Customer's Reference/PO Number:	
Publication:	The Orange County Register
Publication Dates:	01/17/2025
Total Amount:	$1907.47
Payment Amount:	$0.00
Amount Due:	$1907.47
Notice ID:	BWByivB8M0kInEi9XY4i
Invoice Text:	NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC HEARING In compliance with Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132) and the federal rules and regulations adopted in implementation thereof, the Agenda will be made available in appropriate alternative formats to persons with a disability. Should you need special assistance to participate in this meeting, please contact the Business Department. Notification 48 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to this meeting. A public hearing has been scheduled for the following: Laguna Beach High School Pool Modernization Project The Laguna Beach Unified School District (District) is processing a series of actions that would ultimately allow for the redevelopment and modernization of the Laguna Beach High School pool facility. The project will include demolition, excavation, grading, drainage, and building construction to replace the current pool with a new pool in the same location to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building. Environmental Determination: A Mitigated Negative Declaration (MND) has been prepared pursuant to Section 15070 of the California Environmental Quality Act and per Section 6.04 of the 2020 Local Guidelines for Implementing the California Environmental Quality Act. Location: 670 Park Avenue in the City of Laguna Beach Date of Hearing: March 13, 2025 Place of Hearing: Thurston Middle School, 2100

THE ORANGE COUNTY
REGISTER

The Orange County Register
1920 Main Street, Suite 209
Irvine, California 92614
(714) 796-7000

0011714622

Laguna Beach USD
5050 Blumont Street
Laguna Beach, California 92651

PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Orange

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Orange County Register, a newspaper of general circulation, printed and published in the City of Irvine*, County of Orange, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of County of Orange, State of California, under the date of November 19, 1905, Case No.A-21046. The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

01/17/2025

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Irvine, California

On this 17th day of January, 2025.

Sandra Campos

Signature

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION AND NOTICE OF PUBLIC HEARING

In compliance with Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132) and the federal rules and regulations adopted in implementation thereof, the Agenda will be made available in appropriate alternative formats to persons with a disability. Should you need special assistance to participate in this meeting, please contact the Business Department. Notification 48 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to this meeting.

A public hearing has been scheduled for the following: Laguna Beach High School Pool Modernization Project

The Laguna Beach Unified School District (District) is processing a series of actions that would ultimately allow for the redevelopment and modernization of the Laguna Beach High School pool facility. The project will include demolition, excavation, grading, drainage, and building construction to replace the current pool with a new pool in the same location to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building.

Environmental Determination:	A Mitigated Negative Declaration (MND) has been prepared pursuant to Section 15070 of the California Environmental Quality Act and per Section 6.04 of the 2020 Local Guidelines for Implementing the California Environmental Quality Act.
Location:	670 Park Avenue in the City of Laguna Beach
Date of Hearing:	March 13, 2025
Place of Hearing:	Thurston Middle School, 2100 Park Avenue, Laguna Beach, CA 92651
Time of Hearing:	6:00 PM

Should you have any questions concerning this project, please contact Ella Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The period for comment regarding the Mitigated Negative Declaration for this project is from **January 17, 2025**, to **February 17, 2025**. The Initial Study and proposed Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651 and online at https://www.lbusd.org/departments/facilities/bids-and-public-notices. Please submit your comments via email to Ella Wahlstrom Rogers, at ewahlstromrogers@lbusd.org.

The project site is not listed as a hazardous waste site described in any lists as enumerated under Section 65962.5 of the Government Code.

ANY INTERESTED PARTY MAY APPEAR AND PRESENT ANY INFORMATION WHICH MAY BE OF ASSISTANCE TO THE DISTRICT. A COPY OF THE APPLICATION AND ENVIRONMENTAL DOCUMENTATION IS AVAILABLE FOR INSPECTION IN THE BUSINESS DEPARTMENT.

IF YOU CHALLENGE IN COURT ANY ACTION TAKEN CONCERNING A PUBLIC HEARING ITEM, YOU MAY BE LIMITED TO RAISING ONLY THOSE ISSUES YOU OR SOMEONE ELSE RAISED AT THE PUBLIC HEARING DESCRIBED IN THIS NOTICE, OR IN WRITTEN CORRESPONDENCE TO THE DISTRICT AT, OR PRIOR TO, THE PUBLIC HEARING.
Publish: January 17, 2025
The Orange County Register
Published: 1/17/25

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Temet Aguilar, Chairperson: Pauma Band of Luiseno Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
949.497.7710
www.lbusd.org

January 2, 2025

Temet Aguilar, Chairperson
Pauma Band of Luiseno Indians
P.O. Box 369
Pauma Valley, CA, 92061

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Aguilar:

The Laguna Beach Unified School District ("District") is contacting the Pauma Band of Luiseno Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
949.497.7710
www.lbusd.org

planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the Pauma Band of Luiseno Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

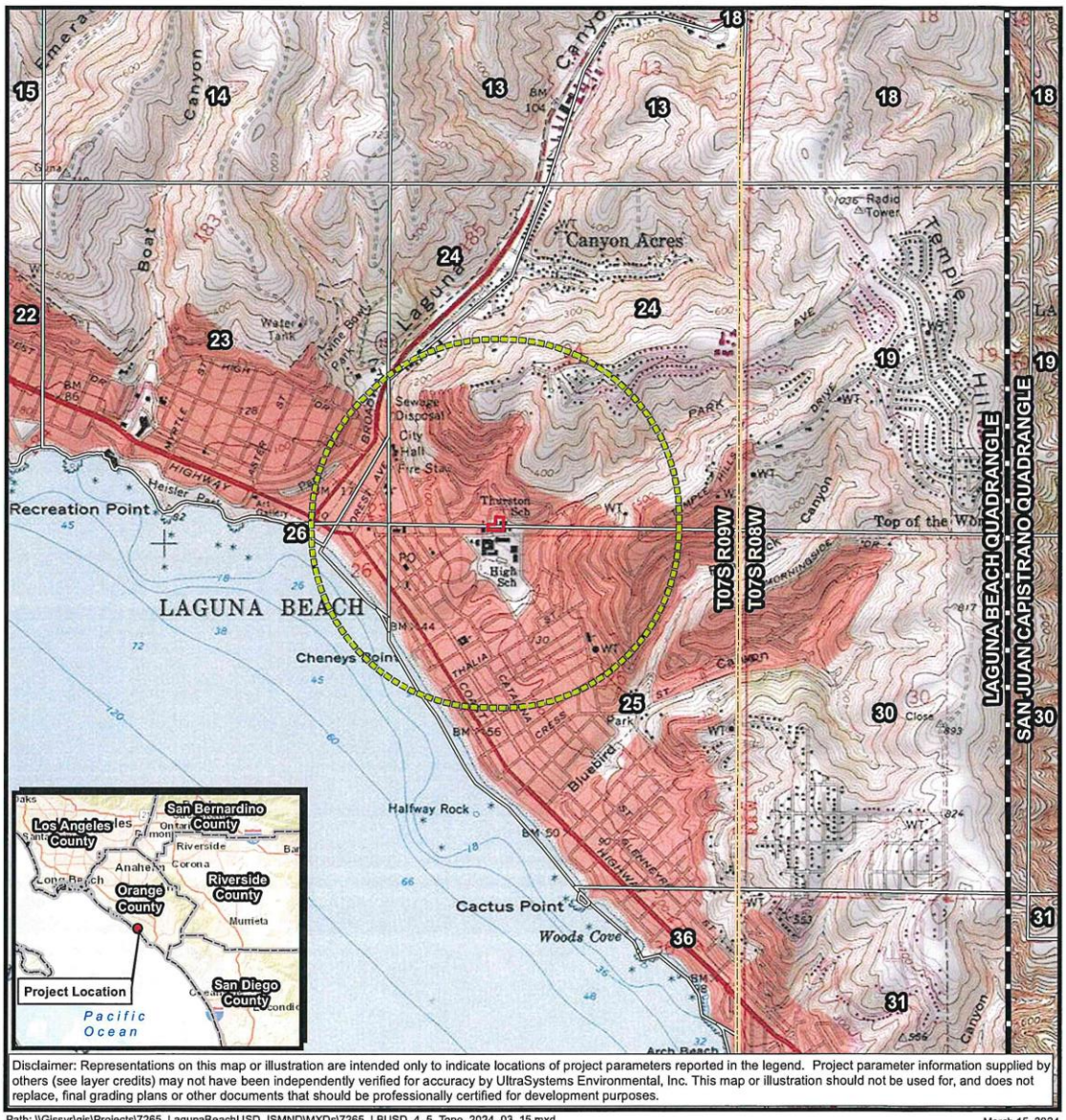
In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
Canyon Acres
Thurston Sch
High Sch
Sewage Disposal
City Hall
Fire Sta
Water Tank
Radio Tower
Top of the World
T07S R09W
T07S R08W
LAGUNA BEACH QUADRANGLE
SAN JUAN CAPISTRANO QUADRANGLE
Project Location
Los Angeles County
San Bernardino County
Riverside County
Orange County
San Diego County
Pacific Ocean
Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.
Path: \\Gissvr\gis\Projects\7265_LagunaBeachUSD_ISMND\MXDs\7265_LBUSD_4_5_Topo_2024_03_15.mxd
March 15, 2024
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Copyright:© 2013 National Geographic Society, i-cubed; California Department of Conservation, 2019; UltraSystems Environmental, Inc., 2024.
Scale: 1:24,000
N
0 1,000 2,000 Feet
0 250 500 Meters
Legend
Project Boundary
Half-Mile Radius
Quadrangle Boundary
Township Boundary
Section Boundary
Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Charles Alvarez, Chairperson: Gabrielino-Tongva Tribe

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
949.497.7710
www.lbusd.org

January 2, 2025

Charles Alvarez, Chairperson
Gabrielino-Tongva Tribe
23454 Vanowen Street
West Hills, CA, 91307

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Alvarez:

The Laguna Beach Unified School District ("District") is contacting the Gabrielino-Tongva Tribe, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

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You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the Gabrielino-Tongva Tribe, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

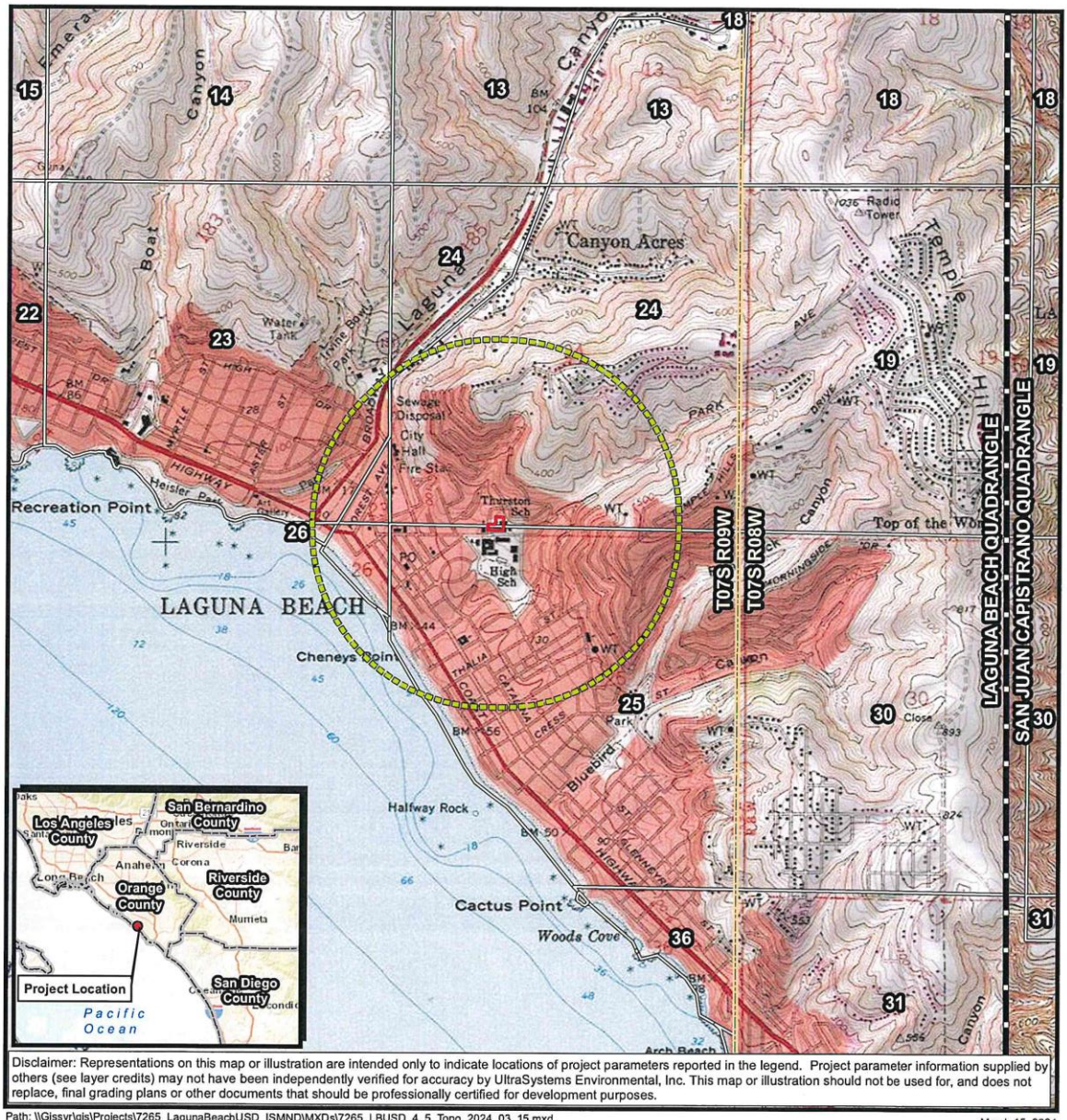
In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



Path: \\Gissvr\gis\Projects\7265_LagunaBeachUSD_ISMND\MXDs\7265_LBUSD_4_5_Topo_2024_03_15.mxd
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March 15, 2024

Scale: 1:24,000

N

0 1,000 2,000 Feet

0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Christina Conley, Cultural Resources Administrator: Gabrielino Tongva Indians of California Tribal Council

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January 2, 2025

Christina Conley, Cultural Resource Administrator
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 941078
Simi Valley, CA, 93094

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Conley:

The Laguna Beach Unified School District ("District") is contacting the Gabrielino Tongva Indians of California Tribal Council, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

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You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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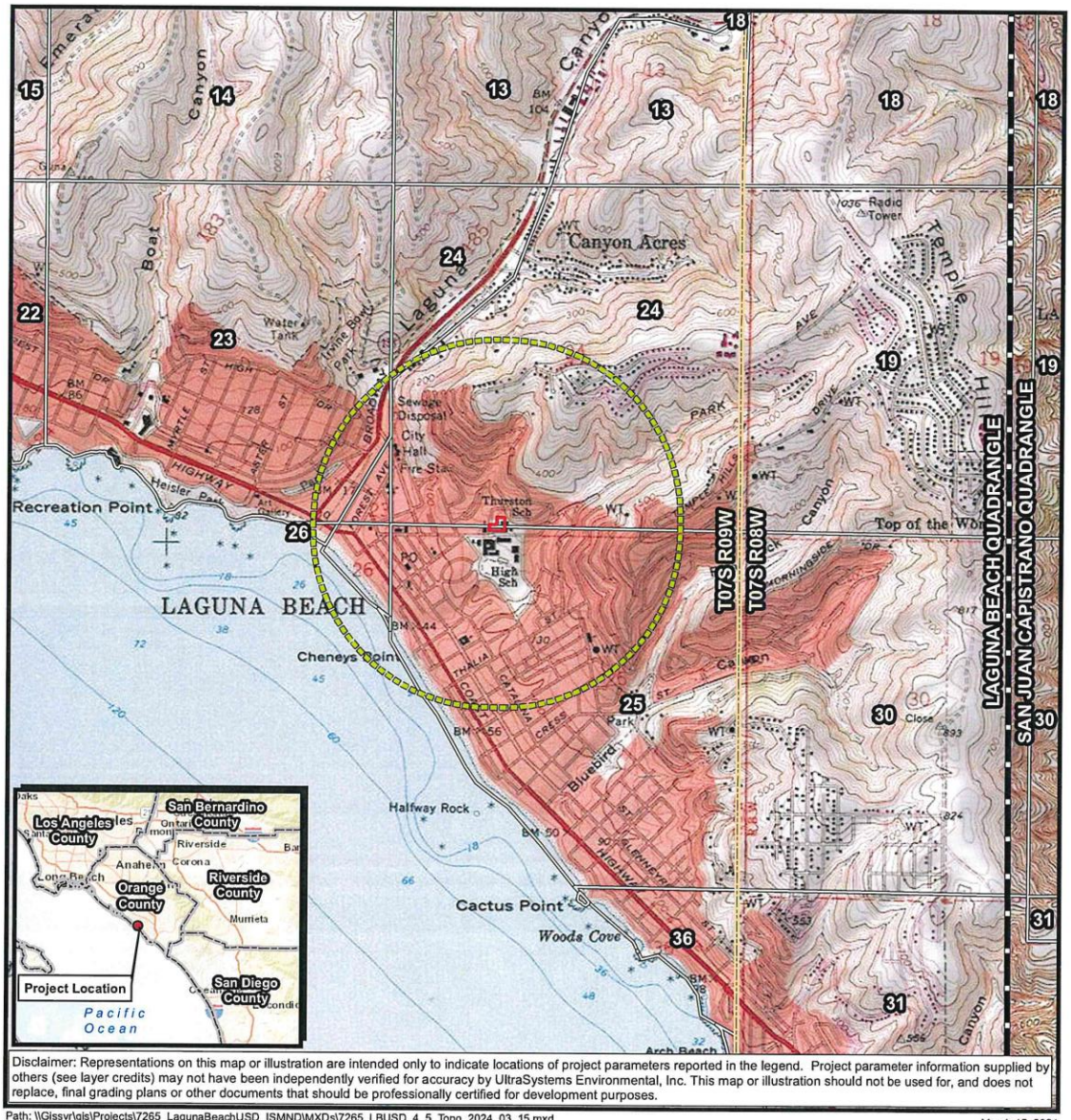
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In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
Canyon Acres
Thurston Sch
High Sch
Park
Close
Top of the World
Radio Tower
Water Tank
Sewage Disposal
City Hall
Fire Sta
Bluebird
Canyon
Laguna
Boat
Temple Hills
T07S R09W
T07S R08W
LAGUNA BEACH QUADRANGLE
SAN JUAN CAPISTRANO QUADRANGLE
Project Location
Los Angeles County
San Bernardino County
Riverside County
Orange County
San Diego County
Pacific Ocean
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Scale: 1:24,000
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0 1,000 2,000 Feet
0 250 500 Meters
Legend
Project Boundary
Half-Mile Radius
Quadrangle Boundary
Township Boundary
Section Boundary
Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Norma Contreras, Chairperson: La Jolla Band of Luiseno Indians

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949.497.7710
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January 2, 2025

Norma Contreras, Chairperson
La Jolla Band of Luiseno Indians
22000 Highway 76
Pauma Valley, CA, 92061

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Contreras:

The Laguna Beach Unified School District ("District") is contacting the La Jolla Band of Luiseno Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the La Jolla Band of Luiseno Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

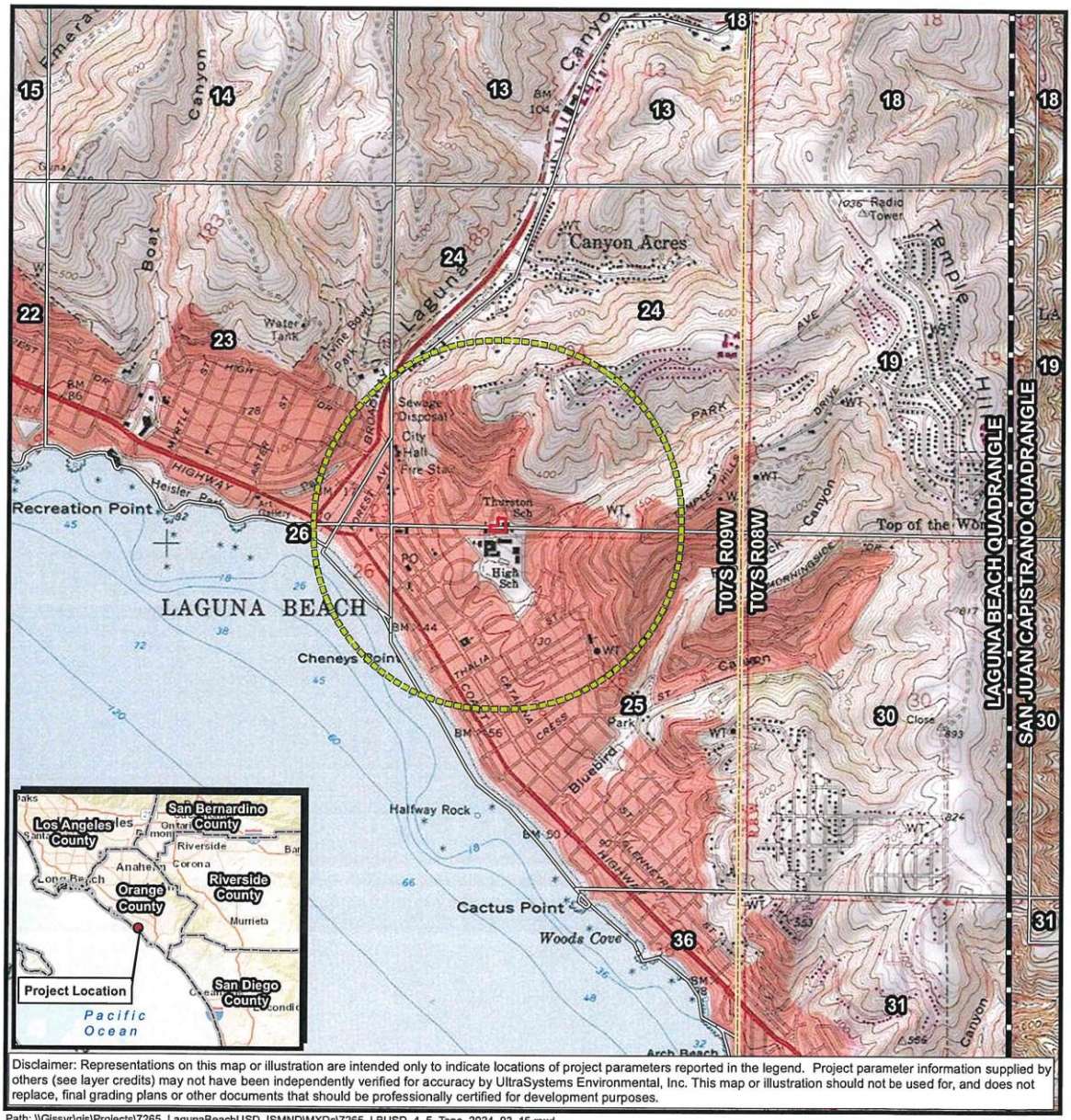
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Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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March 15, 2024

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Scale: 1:24,000

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Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Robert Dorame, Chairperson: Gabrielino Tongva Indians of California Tribal Council

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January 2, 2025

Robert Dorame, Chairperson
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA, 90707

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Dorame:

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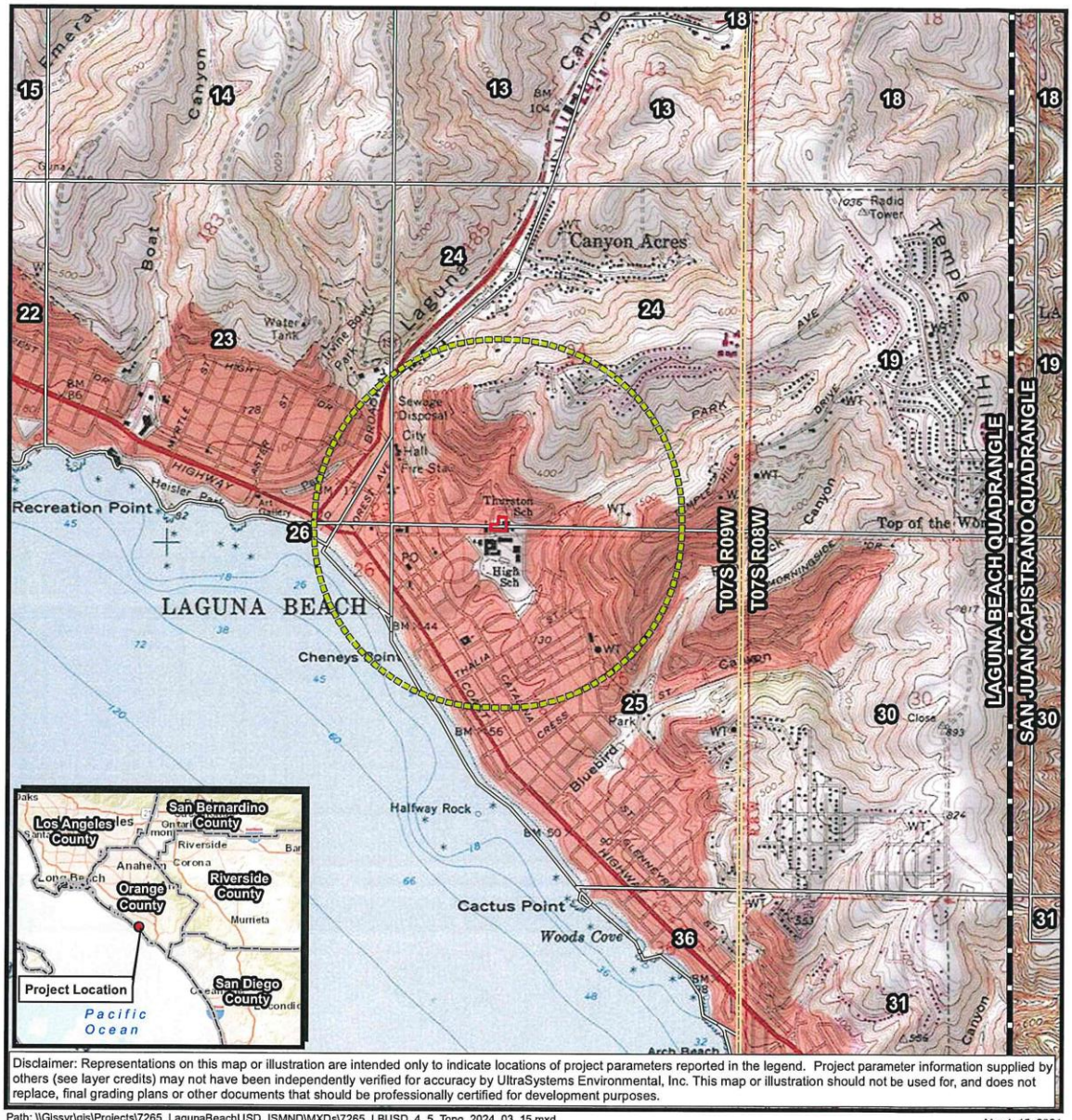
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Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
Arch Beach
Canyon Acres
Thurston Sch
High Sch
Sewage Disposal
City Hall
Fire Sta
Water Tank
Radio Tower
Top of the World
Close
Park
Laguna
Canyon
Bluebird
Thalia
Cress
Morningside
Temple Hills
Boat
Irvine Bowl Park
Art Gallery
Heisler Park
Broadway
Pacific Coast Highway
T07S R09W
T07S R08W
LAGUNA BEACH QUADRANGLE
SAN JUAN CAPISTRANO QUADRANGLE
Project Location
Los Angeles County
San Bernardino County
Riverside County
Orange County
San Diego County
Pacific Ocean
Anaheim
Corona
Riverside
Murrieta
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Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Sam Dunlap, Cultural Resources Director: Gabrielino-Tongva Tribe,

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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January 2, 2025

Sam Dunlap, Cultural Resource Director
Gabrielino-Tongva Tribe
P.O. Box 3919
Seal Beach, CA, 90740

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

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UNIFIED SCHOOL DISTRICT

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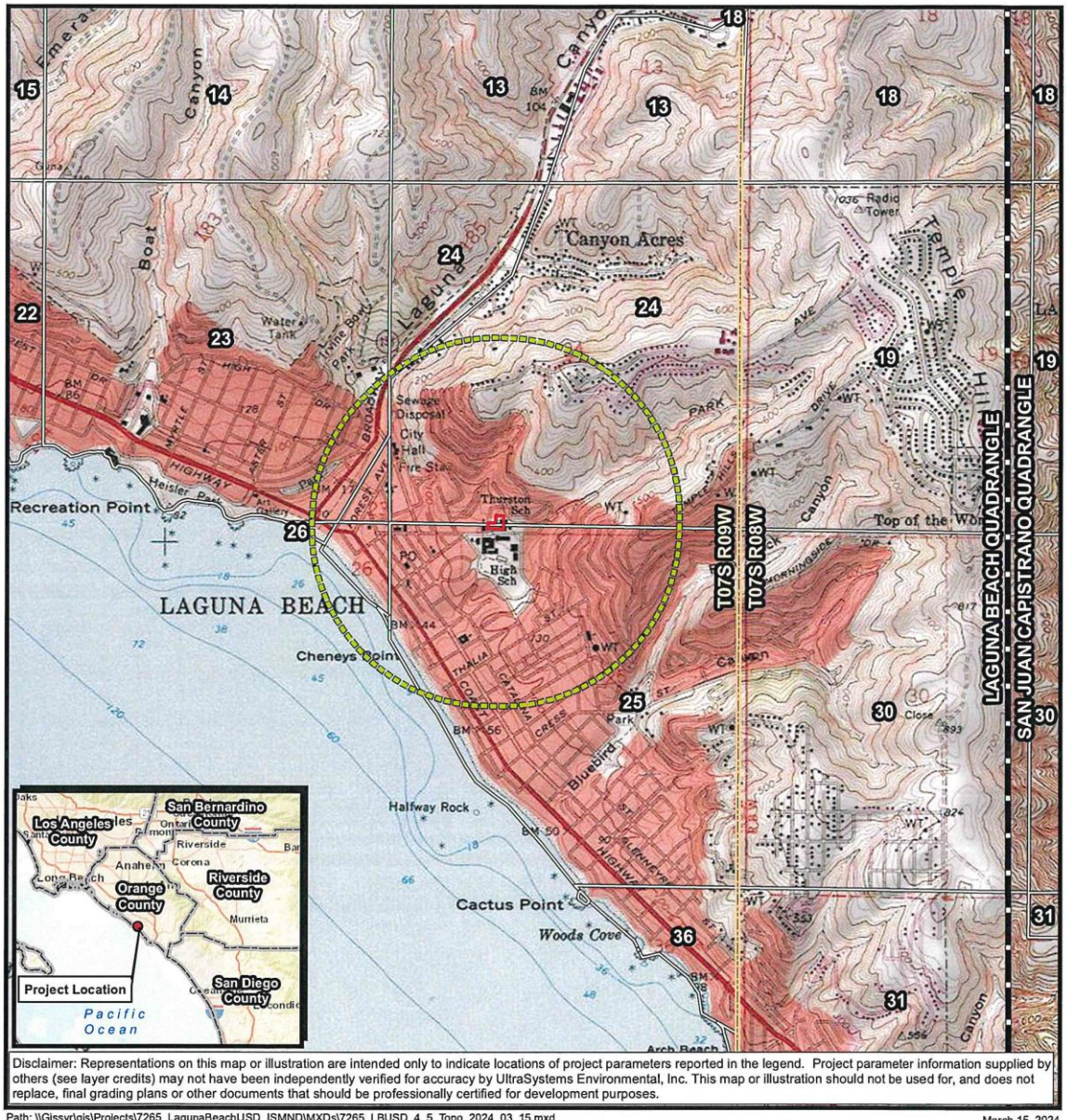
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Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000 N

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0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Shasta Gaughen, Tribal Historic Preservation Officer, Pala Band of Mission Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
949.497.7710
www.lbusd.org

January 2, 2025

Shasta Gaughen, Tribal Historic Preservation Officer
Pala Band of Mission Indians
PMB 50, 35008 Pala Temecula Road
Pala, CA, 92059

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Gaughen:

The Laguna Beach Unified School District ("District") is contacting the Pala Band of Mission Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

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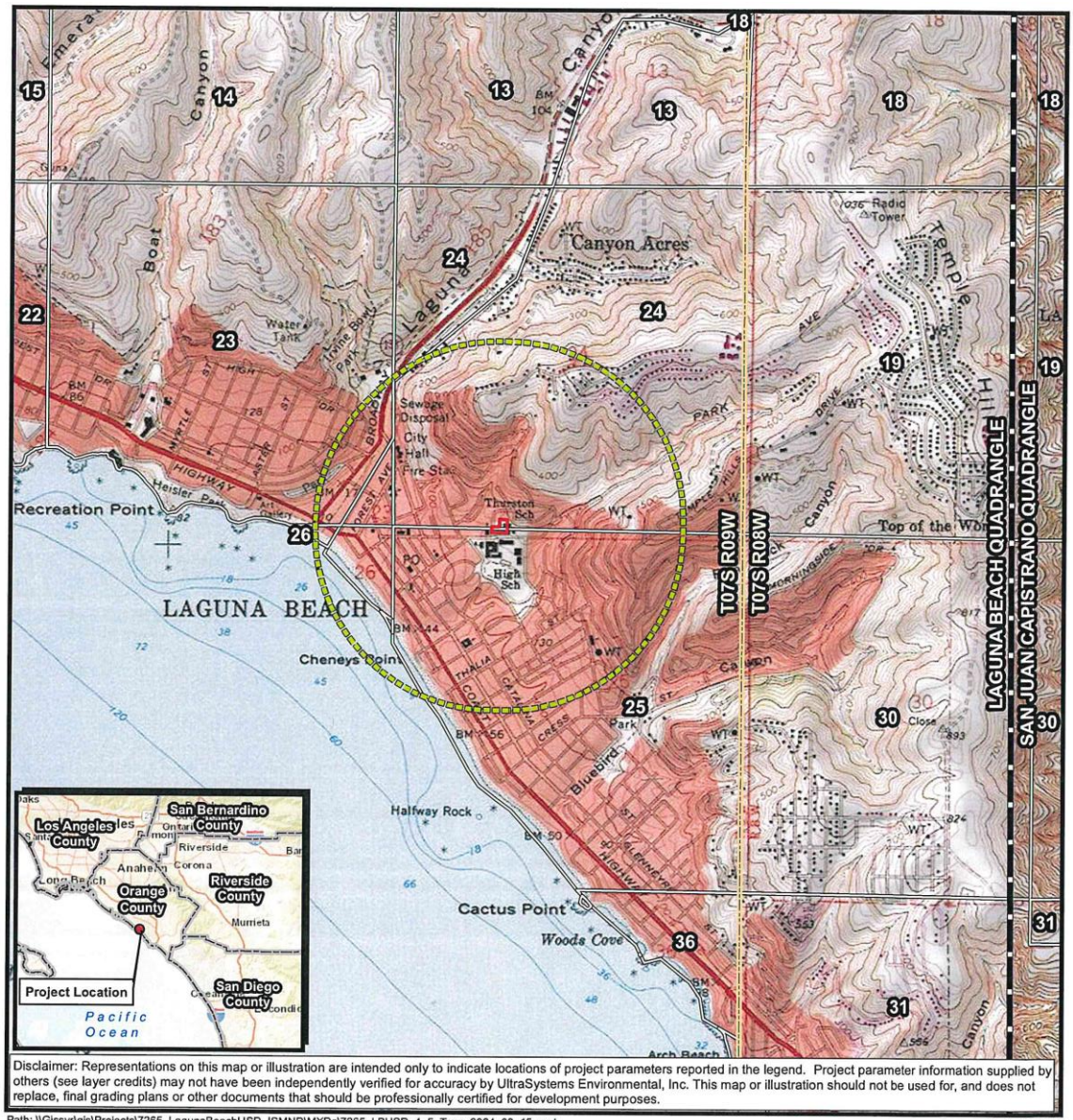
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Pala Band of Mission Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
Canyon Acres
Thurston Sch
High Sch
Sewage Disposal
City Hall
Fire Sta
Water Tank
Top of the World
T07S R09W
T07S R08W
LAGUNA BEACH QUADRANGLE
SAN JUAN CAPISTRANO QUADRANGLE
Project Location
Los Angeles County
San Bernardino County
Riverside County
Orange County
San Diego County
Pacific Ocean
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Scale: 1:24,000
N
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Legend
Project Boundary
Half-Mile Radius
Quadrangle Boundary
Township Boundary
Section Boundary
Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Sandonne Goad, Chairperson: Gabrielino/Tongva

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
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www.lbusd.org

January 2, 2025

Sandonne Goad, Chairperson
Gabrielino/Tongva Nation
106 1/2 Judge John Aiso St., #231
Los Angeles, CA, 90012

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Goad:

The Laguna Beach Unified School District ("District") is contacting the Gabrielino/Tongva Nation, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the Gabrielino/Tongva Nation, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

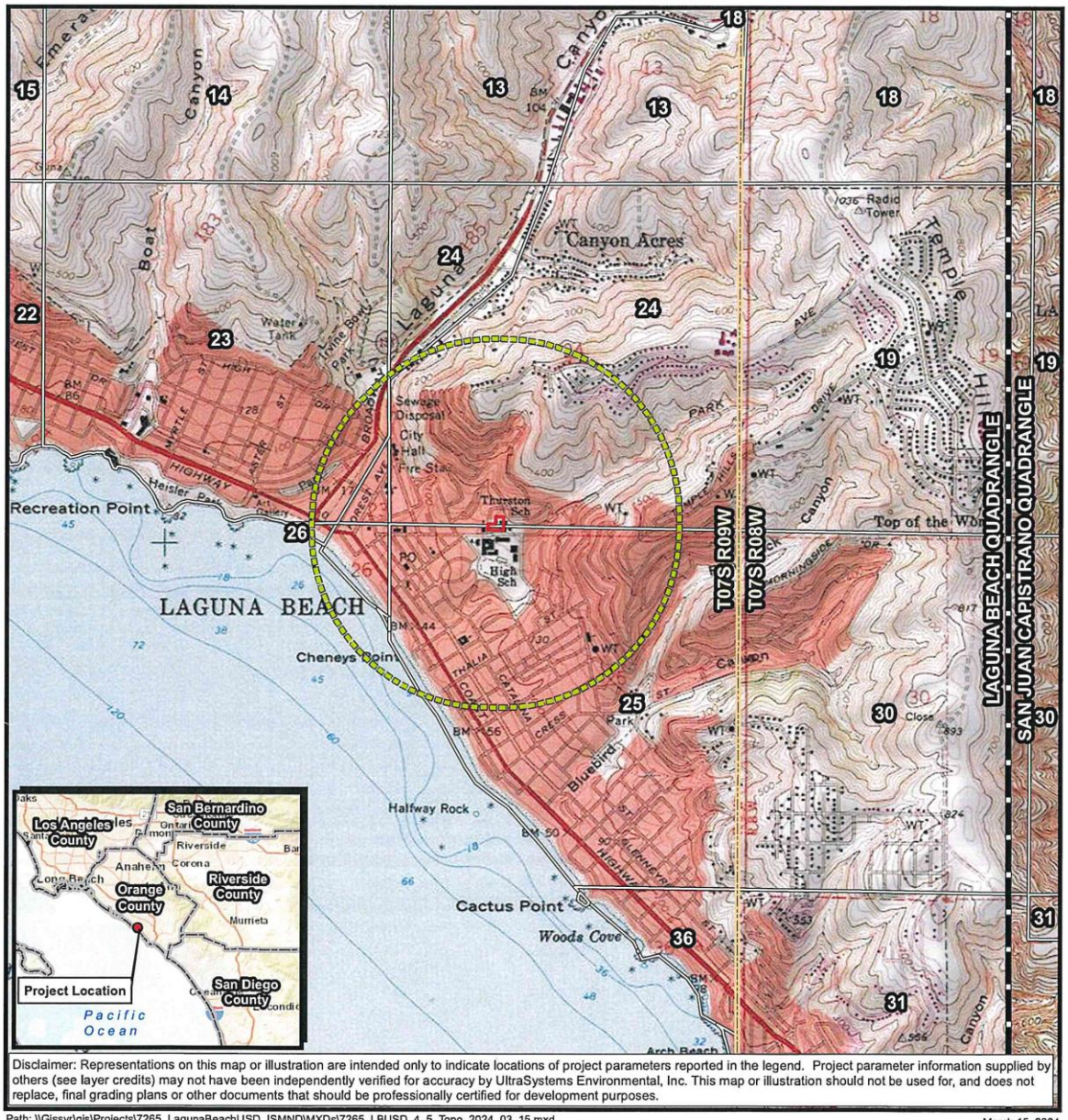
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Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000 N

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Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Sonia Johnston, Chairperson, Juaneño Band of Mission Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
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January 2, 2025

Sonia Johnston, Chairperson
Juaneño Band of Mission Indians
P.O. Box 25628
Santa Ana, CA, 92799

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Johnston:

The Laguna Beach Unified School District ("District") is contacting the Juaneño Band of Mission Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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UNIFIED SCHOOL DISTRICT

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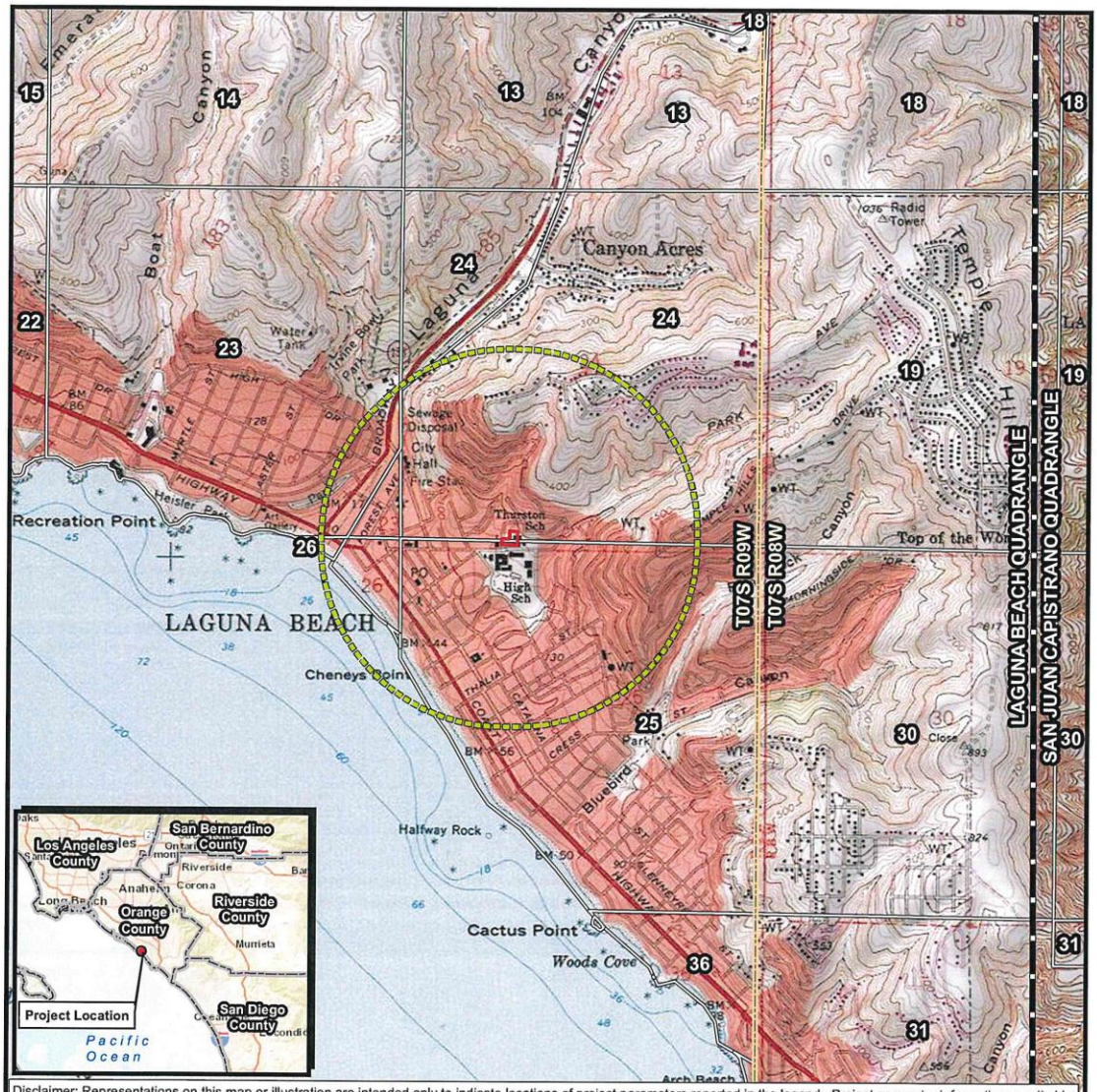
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Juaneño Band of Mission Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000

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Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Heidi Lucero, Chairperson, THPO, Juaneño Band of Mission Indians Acjachemen Nation -84A

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UNIFIED SCHOOL DISTRICT

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January 2, 2025

Heidi Lucero, Chairperson, THPO
Juaneño Band of Mission Indians Acjachemen Nation – 84A
31411-A La Matanza Street
San Juan Capistrano, CA, 92675

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Lucero:

The Laguna Beach Unified School District ("District") is contacting the Juaneño Band of Mission Indians Acjachemen Nation – 84A, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
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Resources Code 21074) on the project site so that this information can be incorporated into the planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

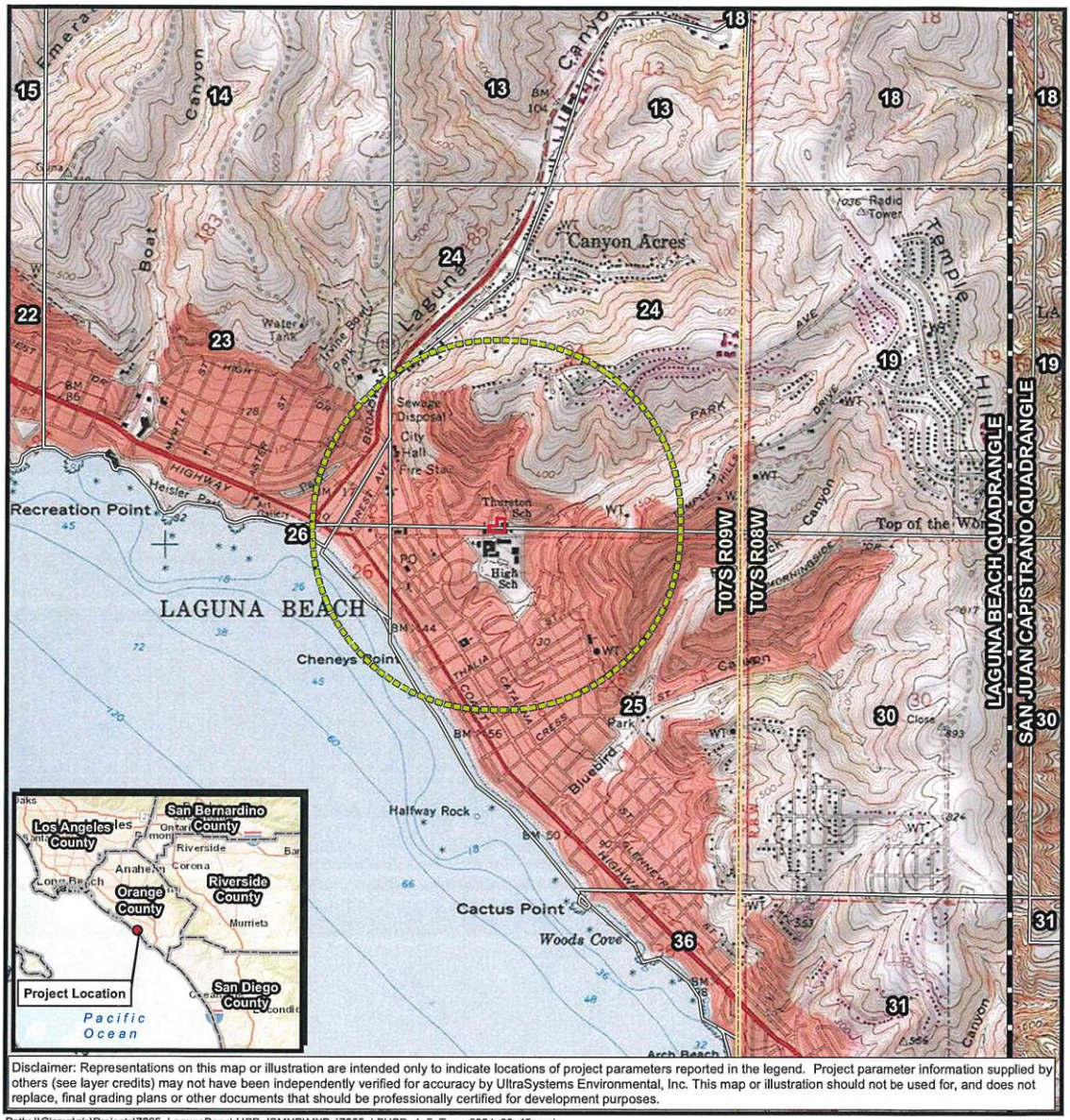
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Juaneño Band of Mission Indians Acjachemen Nation – 84A, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000

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0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
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Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Christina Swindall Martinez, Secretary, Gabrieleño Band of Mission Indians - Kizh Nation

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
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www.lbusd.org

January 2, 2025

Christina Swindall Martinez, Secretary
Gabrieleno Band of Mission Indians - Kizh Nation
P.O. Box 393
Covina, CA, 91723

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Martinez:

The Laguna Beach Unified School District ("District") is contacting the Gabrieleno Band of Mission Indians - Kizh Nation, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

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LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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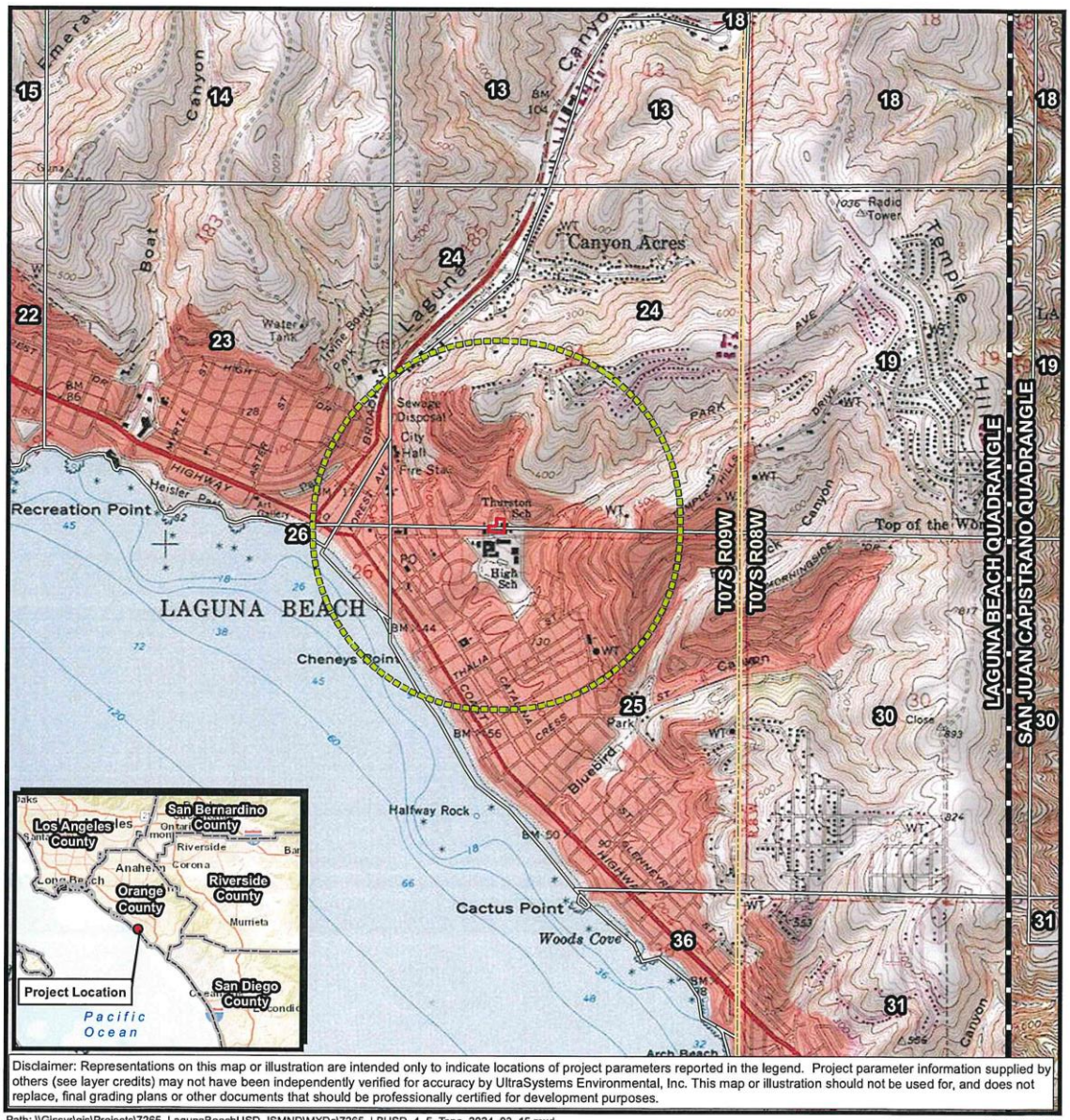
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Gabrieleno Band of Mission Indians - Kizh Nation, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

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Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Coins
Halfway Rock
Cactus Point
Woods Cove
Canyon Acres
Thurston Sch
High Sch
Sewage Disposal
City Hall
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San Bernardino County
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Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Anthony Morales, Chairperson: Gabrieleno/Tongva San Gabriel Band of Mission Indians

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UNIFIED SCHOOL DISTRICT

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January 2, 2025

Anthony Morales, Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA, 91778

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Morales:

The Laguna Beach Unified School District ("District") is contacting the Gabrieleno/Tongva San Gabriel Band of Mission Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

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UNIFIED SCHOOL DISTRICT

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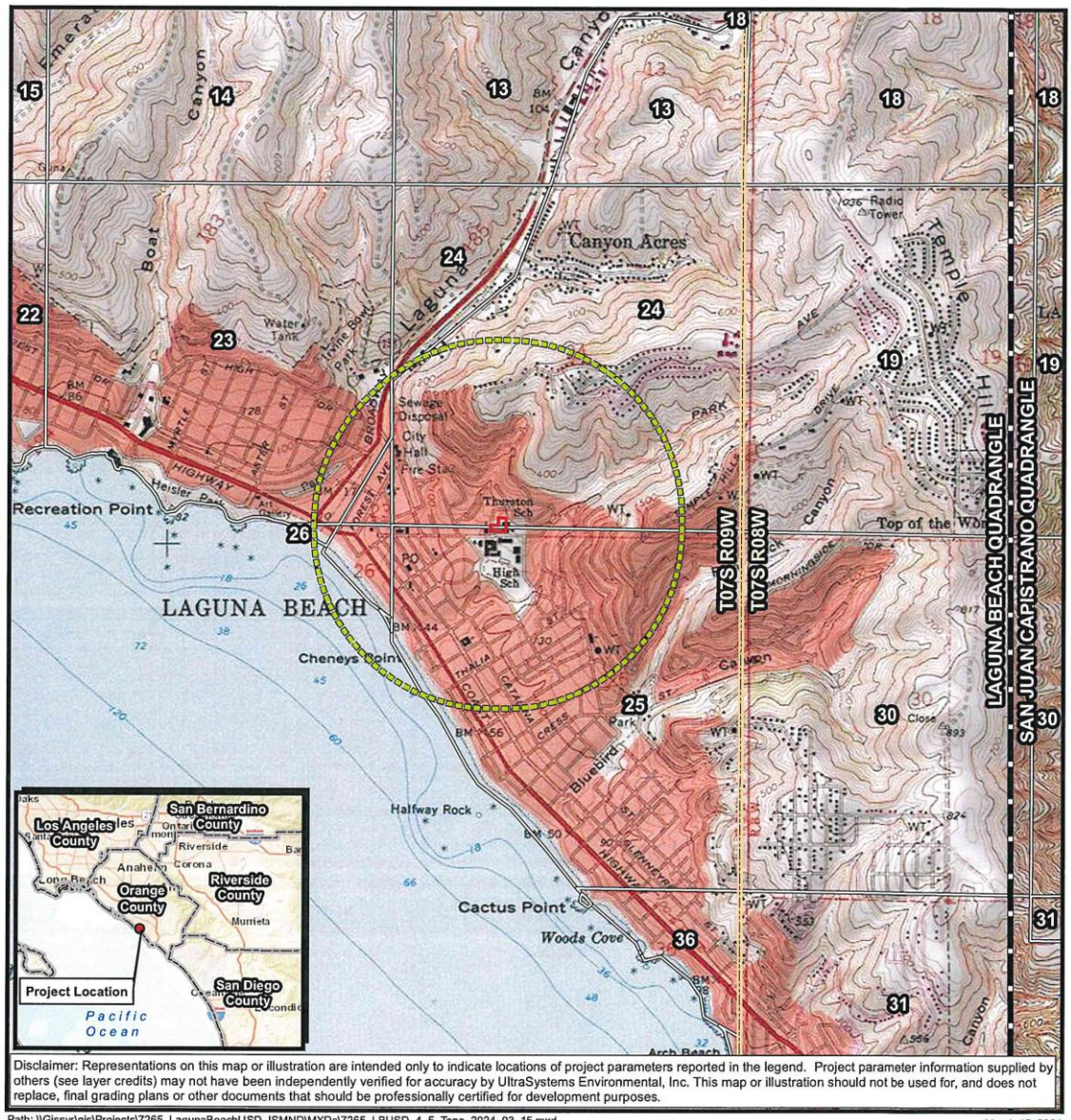
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Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


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Cheneys Point
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Scale: 1:24,000
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Legend
Project Boundary
Half-Mile Radius
Quadrangle Boundary
Township Boundary
Section Boundary
Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Christopher Nejo, Legal Analyst/Researcher, Pala Band of Mission Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

949.497.7700
949.497.7710
www.lbusd.org

January 2, 2025

Christopher Nejo, Legal Analyst/Researcher
Pala Band of Mission Indians
PMB 50, 35008 Pala Temecula Road
Pala, CA, 92059

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Mr. Nejo:

The Laguna Beach Unified School District ("District") is contacting the Pala Band of Mission Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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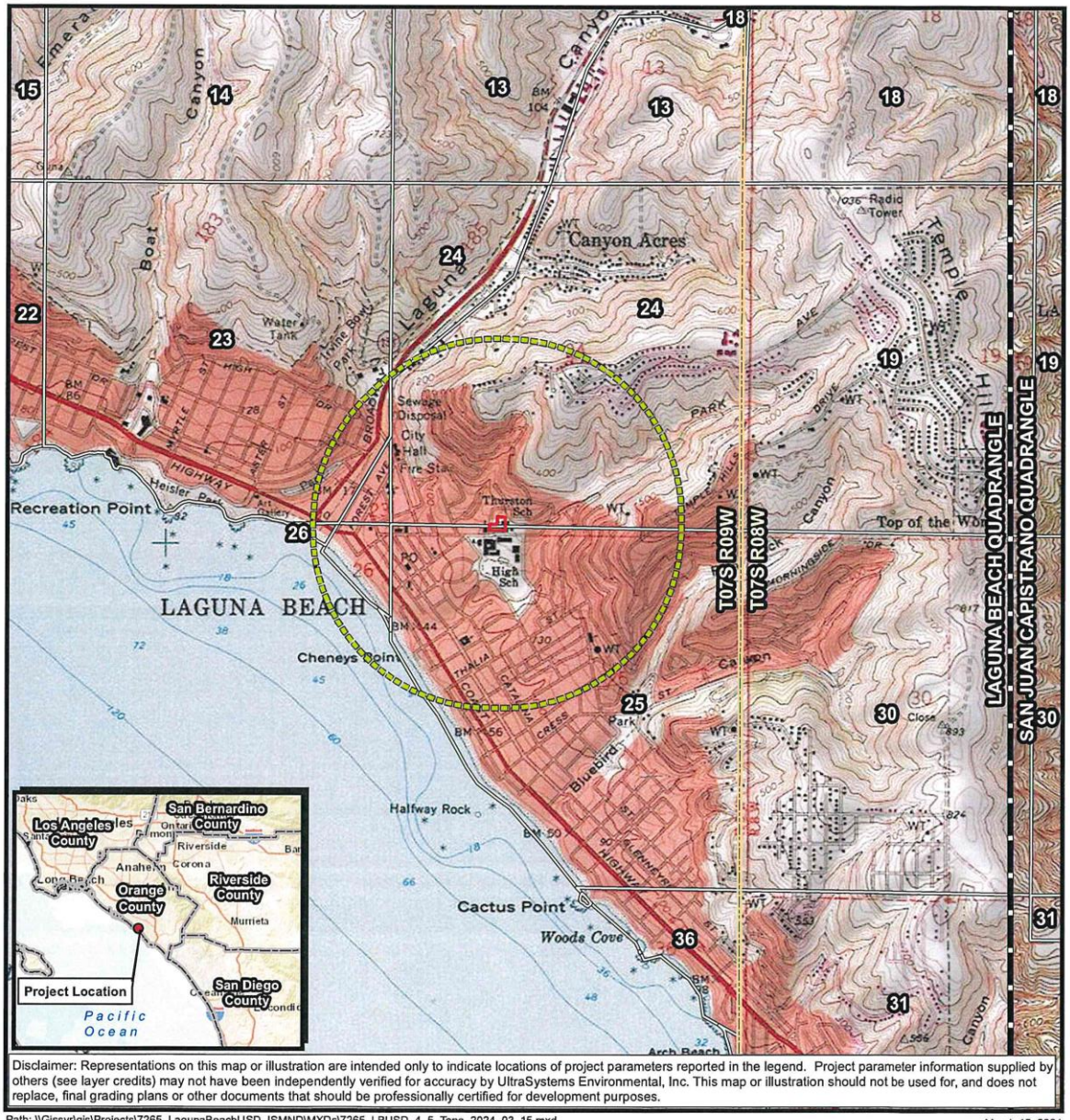
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Pala Band of Mission Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000

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Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Joseph Ontiveros, THPO: Soboba Band of Luiseño Indians

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January 2, 2025

Joseph Ontiveros, Tribal Historic Preservation Officer
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA, 92581

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Mr. Ontiveros:

The Laguna Beach Unified School District ("District") is contacting the Soboba Band of Luiseno Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

LAGUNA BEACH
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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the Soboba Band of Luiseno Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

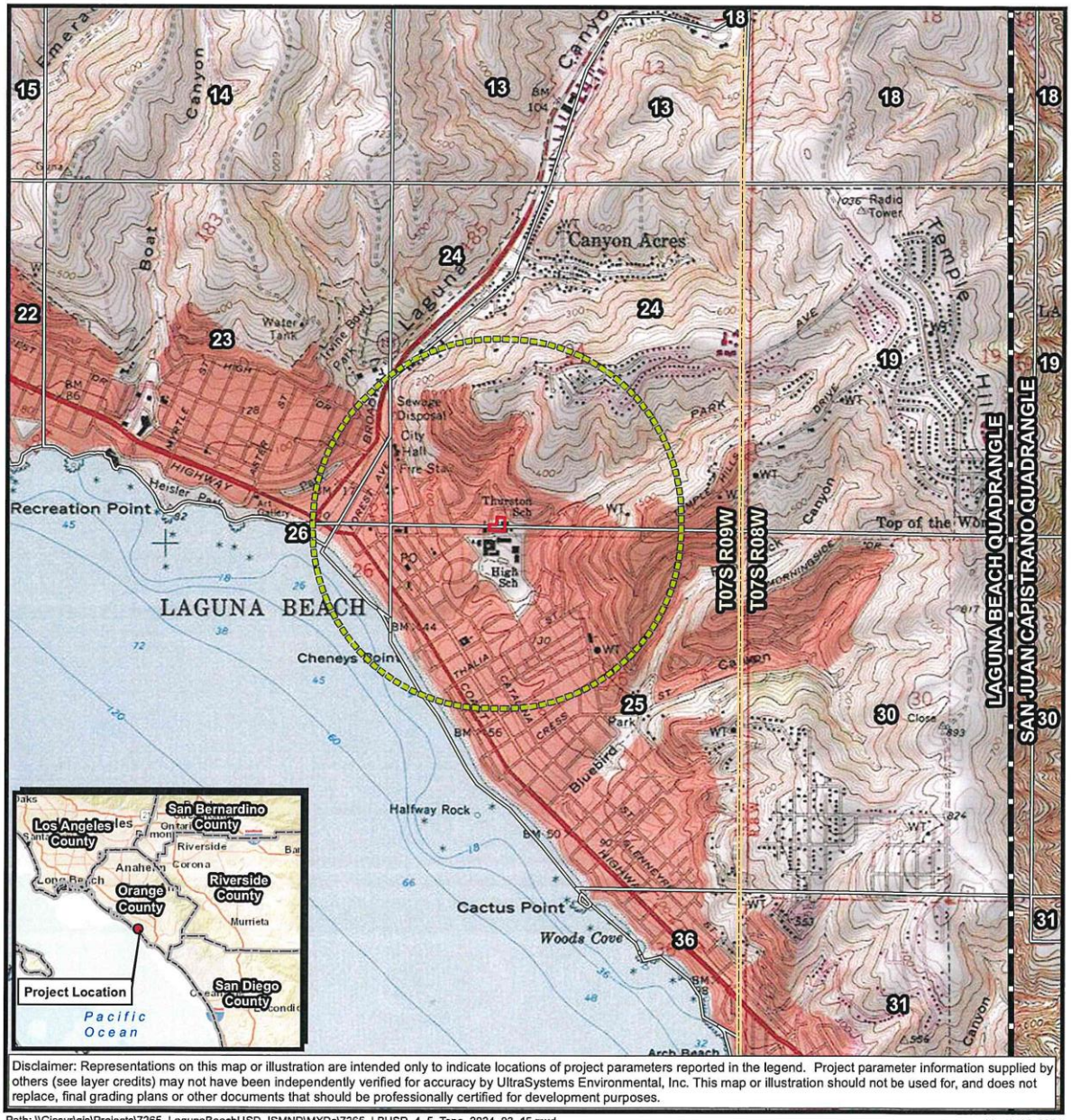
In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000

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Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER

Joyce Perry, Cultural Resources Director, Juaneño Band of Mission Indians Acjachemen Nation - Belardes

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January 2, 2025

Joyce Perry, Cultural Resource Director
Juaneño Band of Mission Indians Acjachemen Nation - Belardes
4955 Paseo Segovia
Irvine, CA, 92603

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Perry:

The Laguna Beach Unified School District ("District") is contacting the Juaneño Band of Mission Indians Acjachemen Nation - Belardes, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

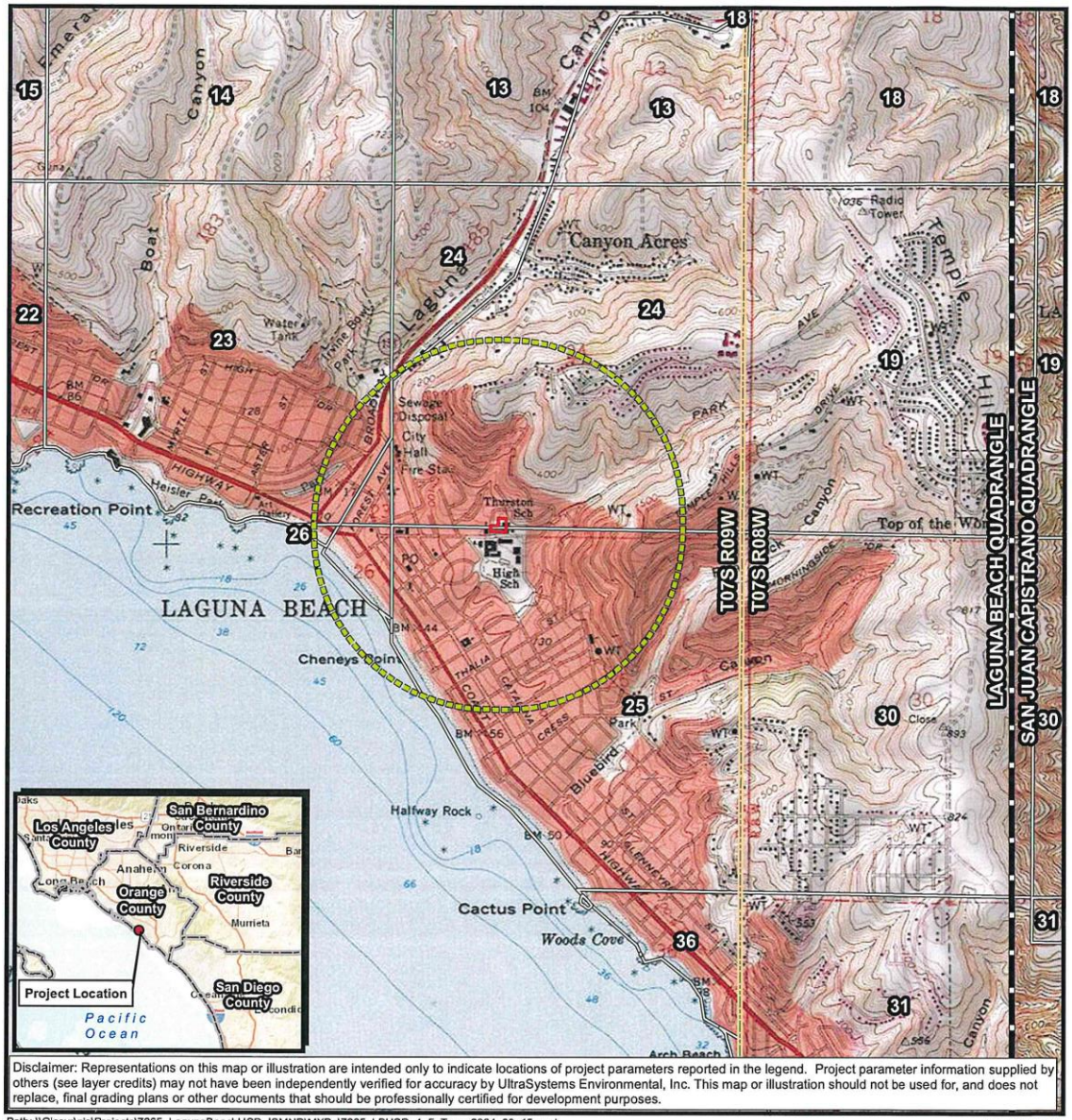
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Juaneño Band of Mission Indians Acjachemen Nation - Belardes, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
Canyon Acres
Thurston Sch
High Sch
Sewage Disposal
City Hall
Fire Sta
Water Tank
Radio Tower
Top of the World
Arch Beach
T07S R09W
T07S R08W
LAGUNA BEACH QUADRANGLE
SAN JUAN CAPISTRANO QUADRANGLE
Project Location
Los Angeles County
San Bernardino County
Riverside County
Orange County
San Diego County
Pacific Ocean
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Legend
Project Boundary
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Quadrangle Boundary
Township Boundary
Section Boundary
Laguna Beach High School and Community Pool Modernization
Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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January 2, 2025

Lovina Redner, Tribal Chair
Santa Rosa Band of Cahuilla Indians
P.O. Box 391820
Anza, CA, 92539

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Tribal Chair Redner:

The Laguna Beach Unified School District ("District") is contacting the Santa Rosa Band of Cahuilla Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

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LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

Your comments and concerns are important to the District and we welcome the opportunity to consult with the Santa Rosa Band of Cahuilla Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

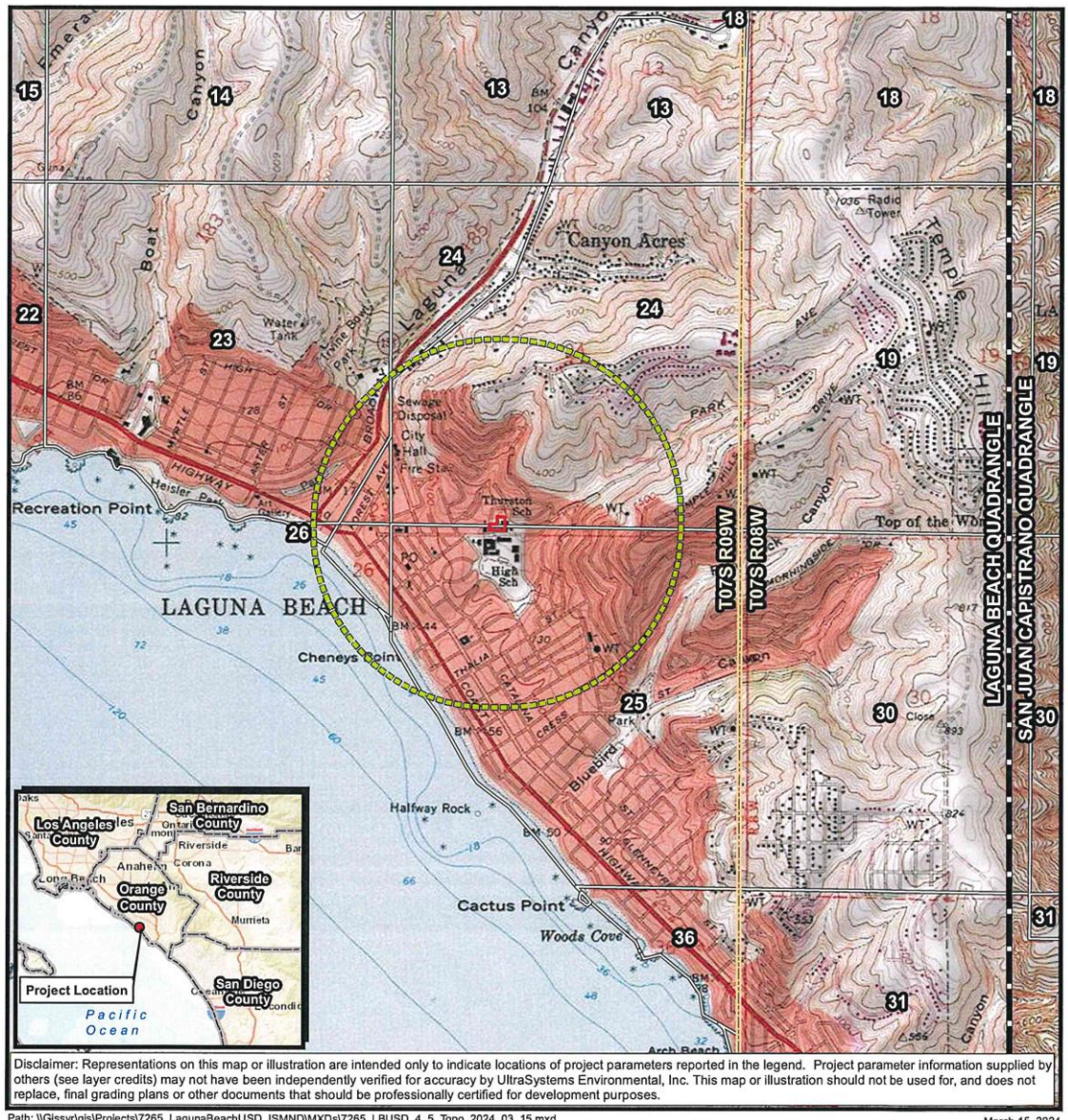
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Respectfully yours,

Elia Wahlstrom Rogers

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map


LAGUNA BEACH
Recreation Point
Cheneys Point
Halfway Rock
Cactus Point
Woods Cove
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Thurston Sch
High Sch
Sewage Disposal
City Hall
Fire Sta
Water Tank
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T07S R09W
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Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25
UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Andrew Salas, Chairperson: Gabrieleño Band of Mission Indians - Kizh Nation

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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January 2, 2025

Andrew Salas, Chairperson
Gabrieleno Band of Mission Indians - Kizh Nation
P.O. Box 393
Covina, CA, 91723

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Salas:

The Laguna Beach Unified School District ("District") is contacting the Gabrieleno Band of Mission Indians - Kizh Nation, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

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UNIFIED SCHOOL DISTRICT

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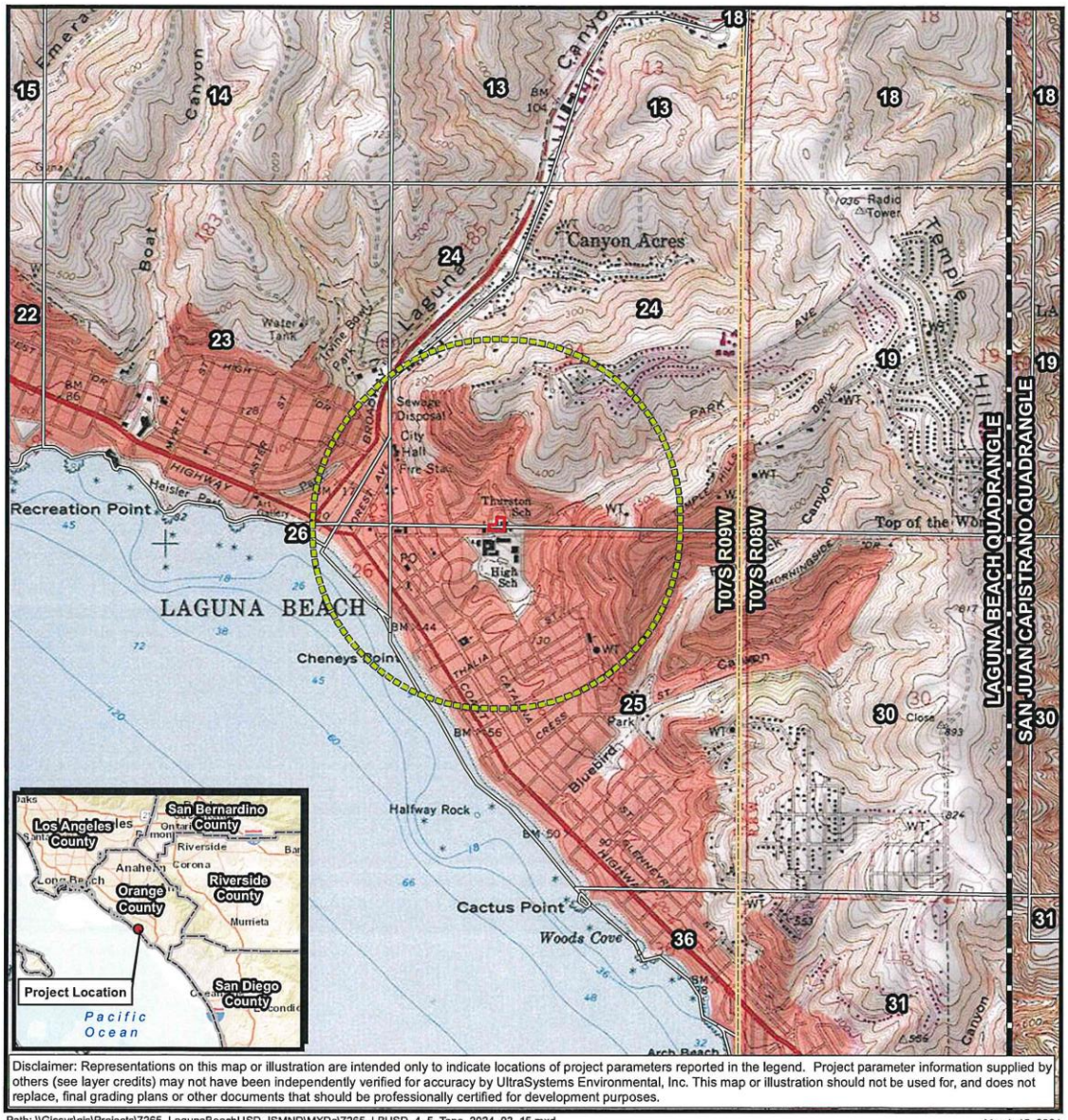
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Gabrieleno Band of Mission Indians - Kizh Nation, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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- Quadrangle Boundary
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Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Jessica Valdez, Cultural Resource Specialist: Soboba Band of Luiseño Indians

LAGUNA BEACH
UNIFIED SCHOOL DISTRICT

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www.lbusd.org

January 2, 2025

Jessica Valdez, Cultural Resource Specialist
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA, 92581

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Valdez:

The Laguna Beach Unified School District ("District") is contacting the Soboba Band of Luiseno Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

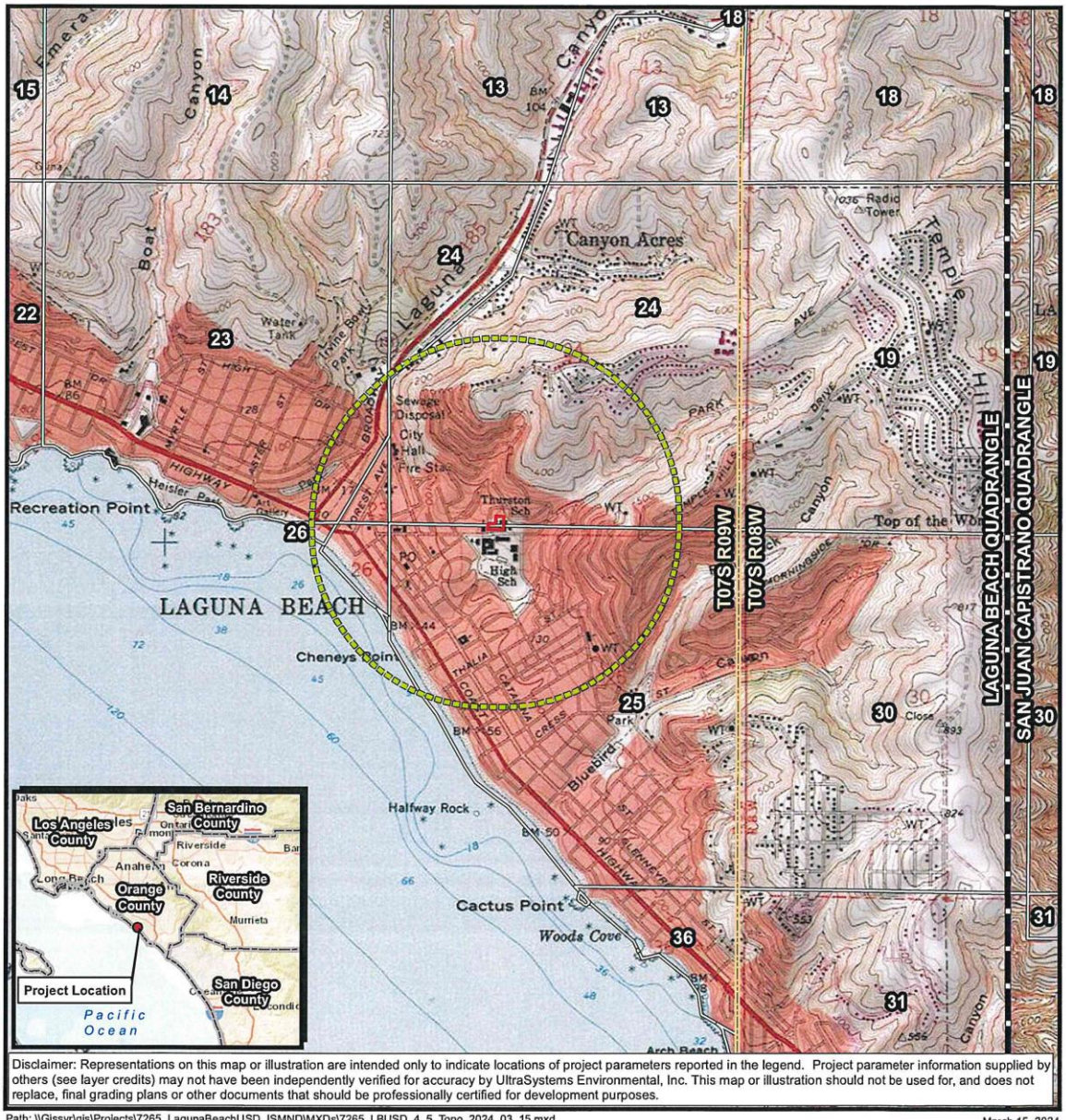
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Soboba Band of Luiseno Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



Disclaimer: Representations on this map or illustration are intended only to indicate locations of project parameters reported in the legend. Project parameter information supplied by others (see layer credits) may not have been independently verified for accuracy by UltraSystems Environmental, Inc. This map or illustration should not be used for, and does not replace, final grading plans or other documents that should be professionally certified for development purposes.

Path: \\Gissvr\gis\Projects\7265_LagunaBeachUSD_ISMND\MXDs\7265_LBUSD_4_5_Topo_2024_03_15.mxd March 15, 2024

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Scale: 1:24,000 N

0 1,000 2,000 Feet

0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Isaiah Vivanco, Chairperson: Soboba Band of Luiseño Indians

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January 2, 2025

Isaiah Vivanco, Chairperson
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA, 92581

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Chairperson Vivanco:

The Laguna Beach Unified School District ("District") is contacting the Soboba Band of Luiseno Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

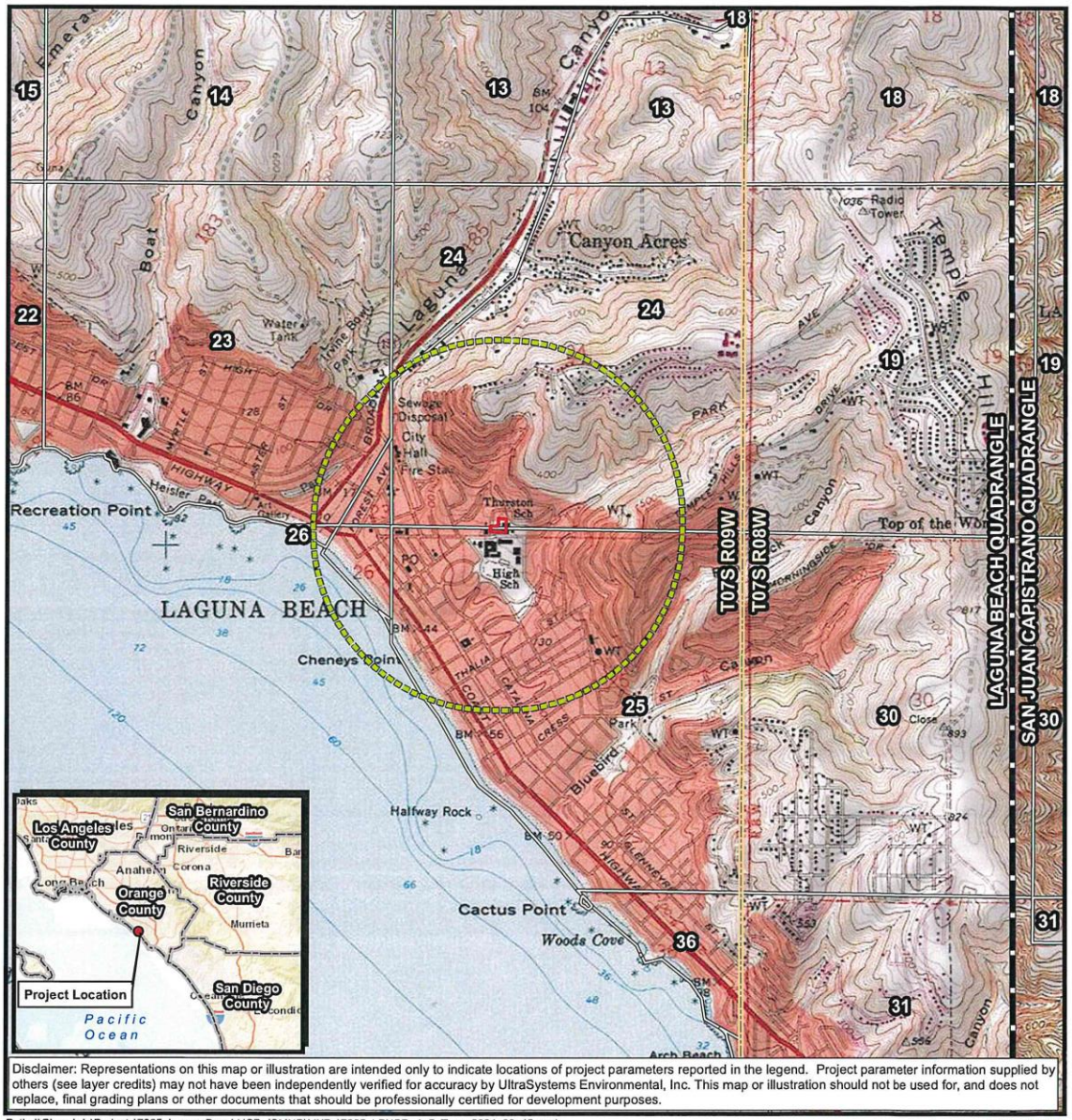
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Soboba Band of Luiseno Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Path: \\Glssvr\gis\Projects\7265_LagunaBeachUSD_ISMND\MXDs\7265_LBUSD_4_5_Topo_2024_03_15.mxd
March 15, 2024

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Scale: 1:24,000

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0 1,000 2,000 Feet

0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

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ATTACHMENT E: AB 52 TRIBAL CONSULTATION LETTER
Alexis Wallick, Assistant THPO, Pala Band of Mission Indians

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January 2, 2025

Alexis Wallick, Assistant THPO
Pala Band of Mission Indians
PMB 50, 35008 Pala Temecula Road
Pala, CA, 92059

RE: Assembly Bill 52 Notice for the City of Laguna Beach Unified School District, Laguna Beach High School Pool Modernization Project, Laguna Beach, Orange County, California. UltraSystems Environmental Project No. 7265.

Dear Ms. Wallick:

The Laguna Beach Unified School District ("District") is contacting the Pala Band of Mission Indians, pursuant to the provisions of Assembly Bill 52 of the Public Resources Code, for formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with your tribe for the purpose of requesting consultation to protect any tribal cultural resources that may exist in the planning area. Section 21080.3.1(d) requires the written notification to include a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation.

Project Description: The Laguna Beach High School Pool Modernization Project proposes upgrades to the existing 25-meter pool facility used jointly by the City of Laguna Beach and the Laguna Beach Unified School District. Planned improvements include expanding the pool to 45 meters and accommodating sixteen 25-yard lap lanes with a consistent depth of 7'-0" to support high school competitions and community recreational needs. The project also involves reconstructing the pool support building on the west side, extending it into the parking lot, while preserving existing retaining walls to minimize soil disturbances. Modernizing the facility within its current footprint enhances functionality for diverse activities while maintaining environmental and structural integrity.

Project Location: The Project is located in the central portion of the city of Laguna Beach, and is specifically located at 670 Park Avenue, at the corner of Park Avenue and Manzanita Drive. This may be seen on the *Laguna Beach, Calif.*, USGS topographical quadrangle, Range 09 West, Township 07 South, in the SE ¼ of the SW ¼ of Section 24 and in the NE ¼ of the NW ¼ of Section 25. This is shown on the accompanying map and the Project boundary is depicted with a one-half mile buffer zone.

You are a traditionally and culturally affiliated California Native American tribal representative who may request notice of projects where AB 52 applies within the District. We are requesting any information that you may have regarding tribal cultural resources (as defined by Public Resources Code 21074) on the project site so that this information can be incorporated into the

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planning phase of the project. Please inform the District if you wish to conduct consultation with the District regarding this project.

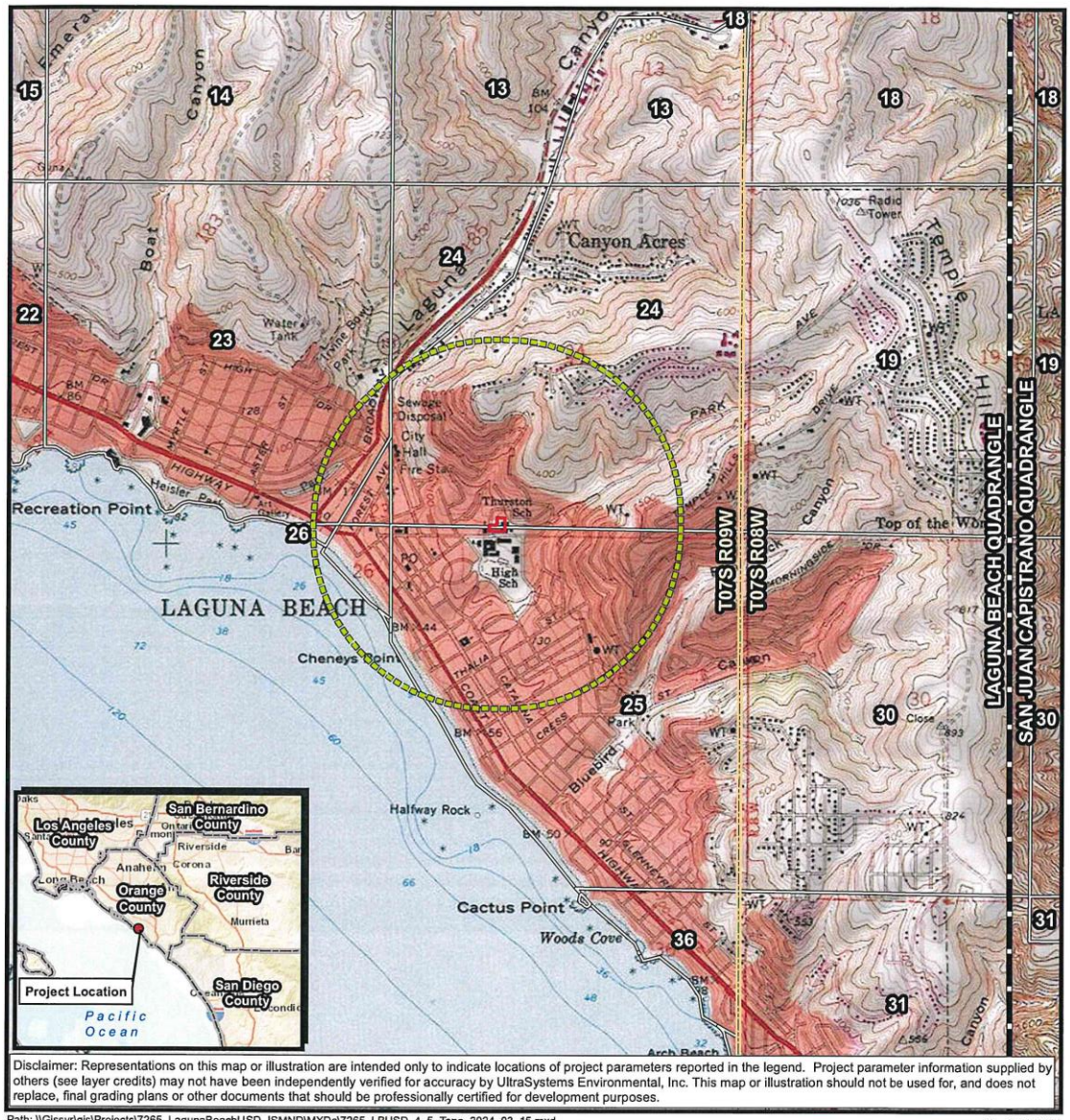
Your comments and concerns are important to the District and we welcome the opportunity to consult with the Pala Band of Mission Indians, upon your request. As the lead agency, please contact us within 30 days of receipt of this letter if you would like additional information about this project or would like to consult with the District about any tribal cultural resources that may be located within the project site.

In order to arrange a consultation with the District (a face-to-face or telephone meeting), please contact Administrative Assistant, Facilities, Elia Wahlstrom Rogers, at 949-497-7700 ext. 5218 or facilities@lbusd.org to make scheduling arrangements. Any dealing between your government and the Laguna Beach Unified School District will be kept in the strictest confidence.

Respectfully yours,

Elia Wahlstrom Rogers, Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
Email: facilities@lbusd.org
Ph: (949)-497-7700 ext. 5218

Attachments: project area map



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Scale: 1:24,000

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0 250 500 Meters

Legend

- Project Boundary
- Half-Mile Radius
- Quadrangle Boundary
- Township Boundary
- Section Boundary

Laguna Beach High School and Community Pool Modernization

Topographic Map
USGS Quadrangle: Laguna Beach
Township: 7S Range: 9W
Sections: 24, 25

UltraSystems

ATTACHMENT F: COMMENT LETTER A

Department of Toxic Substances Control

Yana Garcia
Secretary for
Environmental Protection

Katherine M. Butler, MPH, Director
8800 Cal Center Drive
Sacramento, California 95826-3200
dtsc.ca.gov

Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

January 28, 2025

Elia Wahlstrom Rogers
Administrative Assistant
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92551
ewahlstromrogers@lbusd.org

RE: MITIGATED NEGATIVE DECLARATION FOR THE LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION DATED JANUARY 17, 2025, STATE CLEARINGHOUSE NUMBER 2025010571

Dear Elia Wahlstrom Rogers,

The Department of Toxic Substances Control (DTSC) received a Mitigated Negative Declaration (MND) for the Laguna Beach High School Pool Modernization (Project). The Project will include demolition, excavation, grading, drainage, and building construction to elongate the pool in the current north-south alignment and configuration. Additionally, the two-story pool support building is to be reconstructed on the west side of the pool extending into the current parking lot area, and concrete bleachers will be constructed adjacent to the new support building. After reviewing the project, DTSC recommends and requests consideration of the following comments:

1. If the district plans to use California Department of Education (CDE) State funds for the project, then the district shall comply with the requirements of Education Code (EDC), §17210, §17213.1, and §17213.2, unless otherwise specifically exempted under section §17268. If the district is not using CDE

State funds for the project, or is otherwise specifically exempt under section §17268, DTSC recommends the district continue to investigate, clean up the Site under the oversight of Orange County and in concurrence with all applicable DTSC guidance documents, if necessary. For more information on the CDE State funding, please visit the Office of Public-School Construction webpage.

A local education agency may also voluntarily request the CDE site/plan approval for locally funded site acquisitions and new construction projects. In these cases, CDE will require DTSC to review and approve prior to its final approval, except when exempt under section 17268.

2. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition, and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual.
3. DTSC recommends that all imported soil and fill material should be tested to assess any contaminants of concern meet screening levels as outlined in DTSC's Preliminary Endangerment Assessment (PEA) Guidance Manual. Additionally, DTSC advises referencing the DTSC Information Advisory Clean Imported Fill Material Fact Sheet if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material and, if applicable, sampling be conducted to ensure that the imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

DTSC appreciates the opportunity to comment on the MND for the Laguna Beach High School Pool Modernization If you would like to proceed with DTSC's school environmental review process, please visit DTSC's Evaluating & Clean-up School 3-Step Process to begin a Phase I Environmental Site Assessment.

Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like clarification on DTSC's comments, please respond to this letter or via CEQA Review email for additional guidance.

Sincerely,

Tamara Purvis

Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

cc: (via email)

Governor's Office of Land Use and Climate Innovation

State Clearinghouse

State.Clearinghouse@opr.ca.gov

Betsy Lindsay

Principal Project Manager

UltraSystems Environmental Inc.

blindsay@ultrasystems.com

Dave Kereazis

Associate Environmental Planner

HWMP-Permitting Division – CEQA Unit

Department of Toxic Substances Control

Dave.Kereazis@dtsc.ca.gov

Scott Wiley

Associate Governmental Program Analyst

HWMP - Permitting Division – CEQA Unit

Department of Toxic Substances Control

Scott.Wiley@dtsc.ca.gov

ATTACHMENT F: COMMENT LETTER B

Response to:
LAGUNA BEACH HIGH SCHOOL POOL MODERNIZATION
Initial Study and Mitigated Negative Declaration (IS/MND)

The Laguna Beach Unified School District (LBUSD) mailed a postcard with a publication date of January 17, 2025, although it was not postmarked until January 21. The postcard date started a clock with the California Environmental Quality Act (CEQA) setting a deadline of February 17, 2025 for residents' comments, questions, and concerns. However, the IS/MND (available at https://www.lbusd.org/departments/facilities/bids-and-public-notices) for the LBUSD is incomplete (it says so in the report), riddled with errors, inadequacies and deceptions. Details matter. The IS/MND should be rejected on its face.

Page 1 lists the project location as 625 Park Avenue, but on page 1-1 the site is 670 Park Avenue. "The proposed project is surrounded by residential structures to the west, south [sic] and east." What about north?

Proposed Construction

"The pool currently has ten 25-yard lap lanes with an attached shallow kids' pool." (page 1) to be replaced by 45-meter swimming pool (page 1). The *25-meter* x 25-yard pool is to be replaced by a "45-meter x 25-yard pool, with 16 lanes in a north-south [sic] (25-yard) orientation." (page 1-1) **This nearly doubles pool size**.

The equipment/storage building will be replaced with a **larger two-story** 6,692 square-foot structure with an additional 554 square-foot public restroom and shower building. These will encroach on the parking lot reducing the 17 stalls to 7 according to page 1-1 but to 5 according to Figure 3.3-3 PROPOSED SITE PLAN.

Neighborhood Impacts

These proposals can reasonably be assumed to change the neighborhood environment. The Lead Agency (LBUSD) has the responsibility to identify these impacts and to identify mitigation measures to avoid environmental impact. The mitigation measures should be specially spelled out. Neither the Identification of adverse effects nor the proposed mitigation of identified adverse effects in the IS/MND is adequate.

High-sensitivity land uses include residences and religious institutions, both of which surround the proposed project. Table 2.2-1 states that to the east of project are the LBHS Tennis Courts. But just above and to the east of the tennis courts are single family residences, as can be seen in Figure 2.1-2. Figure 2.2-2 PHOTOS 1 and 2 are deceptive, not showing these highly impacted single family residences.

The project would have substantial adverse environmental impacts on energy use, water use, noise, lighting, views, aesthetics, and parking.

Transparency is the key. Transparency on the pool project has been lacking since the get-go. The project was "hidden under a bushel basket" and only after word leaked out and the community was aroused did the school board hold an "Open House" in May 2023 to present plans to the community. In fact, the lack of transparency and the deaf ears of the LBUSD led to a change in the LBUSD board. However, the old board voted to approve the project October 10, 2024 before the November 2024 election and before the newly constituted board could review the project. Then the incomplete IS/MND was mailed.

ENERGY USE – The increased size of the pool and support buildings will result in a net increase in use of electricity (for lighting, building cooling, and water distribution) and natural gas (for building and swimming pool heating). The larger than necessary pool and support buildings will result in wasteful or unnecessary consumption of energy. A smaller pool would require smaller mechanical accessories. The IS/MND states "The proposed project includes "the installation of … unknown utility…" (page 3-15) How can one comment on an unknown? Higher energy use increases utility costs and may contribute to global climate change.

WATER USE – The proposed 45-meter pool would hold 377,500 gallons of water (page 4.19-3), requiring 80% more fill-water than the current pool with a corresponding increase in evaporation, requiring even more water. Laguna is an arid region requiring imported water (with its ever-increasing cost) and where water-wise use is the

aim of Laguna Beach County Water District. The LBUSD should also be water-wise. And this isn't "Centennial High School" as referred to on page 4.19-2. The IS/MND document is a sloppy cut and paste document.

NOISE - The high-sensitive land uses around the project include the single-family neighborhoods directly north, west, east, and northeast and The Church of Jesus Christ of Latter-day Saints to the west. Noise samplings were conducted on only two days (November 6, 2024 6:13-7:45 am and November 15, 2024 3:39-5:19 pm). Samples should have been taken as well during active water polo matches with shot clocks and amplified sound. Water polo shot clocks can have a sound level of up to 120 decibels (dB). Examples of other 120 dB sounds include jet engine, ambulance siren, chain saw, rock concert, and thunderclap, The World Health Organization and the U.S. Environmental Protection Agency recommend keeping environmental noise levels below 70 dB. Because the decibel scale is logarithmic, not linear, each 10 dB increase represents a 10-fold increase in sound intensity. For example, a 10 dB sound is 10 times more powerful than 0 dB, but a 70 dB sound is 10,000,000 times louder.

Additionally, noise levels should have been measured at houses above the tennis courts which are in a direct line for noise and light pollution. The IS/MND assumes the local noise ordinances will be enforced and places the onus on the offended to file a complaint. Rather amplified sound should be banned and dB level of water polo clock should be minimized. Amplified sound from the football/track stadium continues to be a problem. Additional noise would come from the operation of mechanical equipment (e.g., air conditioners, pumps).

LIGHTING - The proposal claims the project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations. However, 40-ft sport lighting is equivalent to a 4- story building and is nearly twice the height street lights on Park Avenue. The neighborhood paid to underground their utilities, now four poles are to project into views. Outdoor lighting can create (1) excessive glare which is annoying and can causing safety problems, (2) light trespass which can reduce a sense of privacy, and (3) light pollution which decreases ability to see the natural night sky. How many stars can you see at night? The school neighborhoods fought this battle once, when lights were installed on the baseball field but which were finally removed. Now we live with the football/track stadium lights.

VIEWS - All existing planters in the current facility will be demolished and new vegetation installed. Figure 3.3-10 POOL CONCEPTUAL PLANTING PLAN shows the proposed replacement vegetation palette, but no specific placement plans are presented. The tall trees included in the planting plan are inappropriate for view preservation (*Washingtonia robusta, Strelitzia nicolia*). Additionally, the "Tiki torch" palms are considered a fire hazard and are inappropriate near structures and areas prone to wildfire, as indeed this area is. The 4-story sport lighting projects way over the area and into the view shed as do the closely spaced palm trees on Park Avenue installed by the school.

AESTHETICS – The IS/MND ironically states that the current pool facility was designed by preservationist architect Milford Wayne Donaldson. He kept the historic 1936 WPA pool building (originally classrooms) in his design. The physical demolition of this historically significant building is a substantial adverse change. With the new configuration the setback from Park Ave is non-existent for the indoor showers and not much larger for the pump room building.

PARKING - The larger two-story locker/equipment building will extend into the current parking lot and reduce the number of stalls from 17 to 5. Figure 3.3-1 of the EXISTING SITE PLAN shows that all parking spaces in the parking lot and surrounding streets are already filled to capacity. And Manzanita Drive is NOT "a two-lane roadway with sidewalks on both sides" (page 4.17-2 to 4.17-3). The only sidewalk on Manzanita is in front of the pool parking lot.

The environmental factors mentioned above would be affected by this project. To many these are great and important changes worthy of attention.

LBHS is the smallest public high school in Orange County. The 2023 census was 888 with a projected 2026 census of 750 (page 3-1), a 16% decrease. And with an expected decrease in the future (page 4.3-9). The 2023 Laguna Beach census was 22,332, a decrease from 2020. Despite decreasing city and school populations, LBUSD has proposed a larger "aquatic center", not just a bigger pool for fewer people. More organized events are likely at the proposed pool as has happened at the football/track stadium and will attract more attendees as

well as visitors with additional noise and traffic. A 45-meter pool is not needed for CIF high school swimming or water polo. A 35- to 40-meter pool meets the original objectives set out by the board. It addresses the ideal configuration for CIF water polo, supports multiple team practices, and expands the number of swim lanes. It is a common size for high schools. It is cheaper to construct and operationally more efficient. The neighborhoods surrounding the pool are 10x closer to the pool (3 abut the pool) than the average. As a result, the negative impact is significantly greater. An analysis of a 35- to 40-meter pool in the existing footprint with the option of retaining the existing buildings should be adequately and accurately explored by the school board before a decision is made. This is a 24/7 issue for the neighborhood; people live here.

Energy Use: Increased.
Water Use: Increased
Light Pollution: Increased
Noise Pollution: Increased
Views: Impacted
Aesthetics: Demolished
Parking: Decreased

JUST BECAUSE YOU CAN DOESN'T MEAN YOU SHOULD.
JUST BECAUSE YOU DON'T HAVE TO DOESN'T MEAN YOU SHOULDN'T (follow city rules).

Submitted January 10, 2025

Annlia and Merton Hill

ATTACHMENT F: COMMENT LETTER C

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

CEQA Comments
1 message

Gary Kasik <garykasik@gmail.com> Thu, Feb 13, 2025 at 12:36 PM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

Thank you for the opportunity to comment on the IS/MND per the 1/17/2025 notice. My comments are offered to improve the document to avoid unnecessary delays as well as to point out certain concerns that can be addressed prior to the scheduled hearing. Always willing to discuss in detail if that helps get an improved presentation for the hearing.

GENERAL OBSERVATIONS

The impact assessment is minimized by representing the project as "replacement" and "modernization" with little to no recognition of the substantial size increases, a three times increase in density of use, and more than doubling spectator capacity. To properly assess before/after impacts it would be helpful to include BEFORE dimensions when referring to the new plans for:

1. Buildings (Sq ft)
2. Deck space
3. Seating Capacity and Orientation
4. Lighting type, quantity, and orientation

Operational plans presented by the district envision three concurrent waterpolo (WP) practices versus one today. Swimming practice common standards presented by the district reference 7-8 swimmers per lane so with eight lanes being added that provides the potential of over 50 additional concurrent swimmers. I saw no reference to existing spectator capacity but from photos I estimated +/-100 with that more than doubling to 272; as well as changing the orientation of the seating from north facing to east facing.

There are multiple references that contradict planned use as presented by the district in prior meetings. While staying mostly inside the existing footprint with similar uses, it's important to represent density and capacity changes. Examples of misleading descriptions include:
"Since this is a pool replacement project, frequency of use, number of attendees, and additional sounds associated with water recreation are not expected to change"
"The use of the modernized pool is expected to remain relatively the same as that of the existing facility."
"The project is not expected to result in an increase to average daily traffic…"
And given a primary objective of the project was to support more home games it is inappropriate to say "…nor will the number of swimming events change greatly...".

The notice card states "A public hearing before the planning commission of the city of Laguna Beach…". I can find no corresponding schedule for the city, so added clarity on the role of the city would be helpful. Additionally, does the approval process require LBUSD board approval and, if so, a simple majority?

Lighting

Lighting is to be reviewed and approved by city staff to be in compliance with Good Neighbor Lighting regulations. City light regulations are acknowledged to be dated in regards to current available technology as well as being primarily residential focused. **Use of the most current available technology to control glare and light leakage should be deployed along with timers or other methods to manage use hours**. In addition to lights location, orientation of scoreboards, clock timers, etc should be addressed to minimize leakage outside the footprint.

Figure 3.3-3 lists four 40' light standards but 3.3.5 references 24'?

Current functions of the lights on the neighboring tennis courts are inconsistent so is "linking" or upgrading should be considered.

Noise

Representing "no or minimal impact" due to the project being "replacement" with no increased use is inconsistent with the stated district operational plan. In the assessment it is important to view noise and time together as noise at 6:00am has a different impact than the same noise at 1:00pm. When the current pool was proposed in 1992-3 local residents, many of whom are still in the same homes, were promised sound mitigation that was never addressed.

The district has proposed reduced hours of operation given the expanded capacity of the facility including ending at 8:00pm but have been essentially silent on morning hours. What are planned hours of operation and what activities will be scheduled in what time slots? WP at 6:00am (potentially 3X current) would not be in compliance with the city noise ordinance that prevents construction or landscape work before 8:00am. Has there been consideration to follow city noise ordinances that apply to residents?

The sound testing poorly aligned with actual and planned uses as the tests were performed during the quietest use activities. A primary stated objective of the district was to support multiple concurrent water polo practices. District plans show three teams in the water at the same time. Noise sampling of "swimming and light conversation" versus expected use of horns, bells, whistles, and shouting from three WP teams simply isn't representative.

The statement "The pool is surrounded by high walls and, on the north side by a building." is not accurate. The east side shows a very low wall and the existing chainlink fencing of the tennis courts. Sound mitigation techniques and solutions were presented at a public district meeting on June 27, 2023 but it appears none have been incorporated into current plans. **Given the near 3X increase in spectator capacity, change of spectator seating orientation, increased use, increased density, and increased events, consideration should be given to added sound mitigation including the techniques presented of attenuation walls, covered facility, audio design and time restrictions.**

A sound attenuation wall that "traps" as much noise as possible inside the envelope to replace the west side fence of the tennis courts should be included in the plans.

Construction noise is a concern but the commitment to follow city building ordinances on sound and hours of operation is expected to be a mitigating factor.

Traffic and Parking

Parking in the vicinity of the high school is currently heavily constrained when school is in session, so even minor impacts should be carefully considered. Section 3.3.4 implies there may be an option ("may require")that doesn't result in lost parking spaces. Is there an option under consideration that is not included in the materials? Figure 3.3-3 shows five parking stalls but the accompanying narrative states seven; this should be consistent.

The statements that traffic related impacts will not increase because use of the facility is not expected to increase do not align with district presentations on expected operation. **Options should be reviewed with the city to maximize parking while minimizing resident impact.** T-lined parking spots, red curbs, clear signage may provide better use of existing parking and unnecessary city enforcement.

Construction Specific

How many total parking spots are eliminated during construction? Figure 3.4-2 shows eliminated spots on Park but does the no parking extend further east than covered in the graphic? How many transient (daily in/out) contractor/labor vehicles are anticipated during construction? The intersection of Park and Manzanita is a heavy concentration of vehicles and student pedestrians crossing Park north and then

Manzanita west. The plans call for adding a "staging and entrance" to that same location. It seems sight lines may be impacted so consideration should be given to relocating crossing points during construction. **Consideration should be given to a reserved construction only parking section in the district parking lot.** That would provide assured labor parking avoiding circling for parking and back up horns of construction trucks in residential areas. The parking lot is very close to constructIon and can be adjusted for when school is not in session.

Safety

Comments regarding parking and construction traffic in heavily traveled pedestrian areas are obviously a priority. Keep in mind key student arrival and dismissal time when extra caution (crossing guards?) should be considered. Often the "mass exodus" from the high school is augmented with toddlers coming back from an outing to Anneliese School or being picked up by parents.

The pool is in a bit of a sunken space so details of how to secure the site from inappropriate access should be addressed. Does the use of a pool cover, as outlined in the plans, present a higher drowning risk should "unauthorized" access occur? Perhaps technology that senses pool or cover contact triggering an alert?

Other

Aesthetics - The project plans and narrative represent there will be no view impact and, in fact, states there will be a minor view improvement. The artist renderings are helpful but they obviously can't address every dimension and the orientation of the building is changing. **I would request the buildings be "staked" as is done for any residential construction to provide clarity and avoid surprises during construction.**

Near the end of Section 4.1.a the building and pool are referred to as "similar to those already in place". Given the pool is 80% larger and the building is now two stories and significantly larger it seems that description could be more accurate.

I counted several hundred solar panels most with direct line of sight into the neighborhoods above and surrounding the pool. **What actions are being taken to eliminate reflection or glare from the panels?**

I didn't see any ADA specifications but assume that's a requirement. The current pool configuration has a sloped ramp that I don't see in the new plans. I would assume a mechanical chair is being proposed? That's a significant loss of functionality for those with physical limitations.

Have you researched and are prepared to defend that the architect of the existing building has no historical or "important person" classification as noted in Section 4.5.3-a "that are associated with the lives of persons significant in our past."

Additional Observations

I offer the following as "proofreading" to help improve the quality of the final document. While many may seem minor the quantity and materiality of some could lead toward a quality conclusion of the overall document:

*There are several references to Appendices including in the Table of Contents but was unable to find them.
***The notice card says the hearing will be before the Planning Commission of the City of Laguna Beach, but the location is a district facility.**
1.1 Refers to a 50M pool
1.1 Address 670 or 625
4.9.c Tony Tobin Elementary School is not near the project
4.9.d Does not apply the project location
4.9.-1 Locations listed are in near project site

4.9.e The airport referenced is not the nearest
4.17.c Manzanita does not have sidewalks on both sides
4.19.a States heating by natural gas, Figure 3.3-8 shows solar
419.a Water Treatment speaks to Centennial High School?
4.19.d The city does not contract with Waste Management but rather CR&R

ATTACHMENT F: COMMENT LETTER D

Attn: Ryan Zajda, Director of Facilities
Laguna Beach Unified School District
550 Blumont Street
Laguna Beach, CA 92651
rzajda@lbusd.org

Re: Public Comment on Laguna Beach High School Pool Modernization IS/MND

Dear Mr. Zajda,

I am writing to formally express my concerns regarding the **Laguna Beach High School Pool Modernization Initial Study and Mitigated Negative Declaration (IS/MND)**. As a **mother, business owner, and active member of the Laguna Beach community**, I urge the District to reconsider the proposed expansion to a **45-meter pool** due to its excessive scale, environmental impact, and unnecessary cost.

I have **first-hand experience with the pool**—I take my children there every summer, and I **regularly exercise at the facility twice a week**. While it is clear that the pool and facilities need improvements, the proposed expansion **goes far beyond what is necessary** and would result in the **loss of valuable community assets**, including:

- The **kiddie pool**, which is a vital resource for families with young children.
- **Existing locker rooms**, which would be relocated to an already limited parking area.
- **Parking spaces**, further straining an area that already struggles with availability.

Additionally, the IS/MND contains **numerous inconsistencies** that must be addressed:

- **Increased Water and Energy Use**: A 45-meter pool will require significantly more resources for heating, maintenance, and water refilling, yet the IS/MND does not adequately account for these impacts.
- **Noise and Light Pollution**: The addition of 40-foot lighting poles and increased water polo activity will introduce **excessive glare, noise, and disruption** to surrounding residents, which the IS/MND fails to assess properly.
- **Traffic and Parking Issues**: The loss of parking spaces and increased usage will **worsen congestion in an already impacted neighborhood**.
- **Lack of Transparency and Community Engagement**: The approval process has lacked meaningful community input, and the IS/MND does not sufficiently consider **alternatives** that would better align with community needs.

I strongly encourage the LBUSD to **reject the current proposal** and instead pursue a **smaller, more practical alternative** (such as a **35- to 38-meter pool**) that **balances student-athlete needs with the interests of the broader community**.

Spending $25 million on an oversized aquatic facility for a school with declining enrollment is not a responsible or community-conscious decision. Improvements should be **smart, sustainable, and responsive** to the needs of all Laguna Beach residents—not just a select few.

Sincerely,
Amber Sparks
Laguna Beach Resident, Mother and Businessowner

ATTACHMENT F: COMMENT LETTER E

Comment Letter E (with attachments)

From: **Larry Zeman** <larryzeman@gmail.com>
Date: Wed, Feb 12, 2025 at 3:24 PM
Subject: CEQA input and opposition to current Laguna Beach HS pool plan
To: <ewahlstromrogers@lbusd.org>
Dear LBUSD:

My name is Larry Zeman and I have lived on Los Robles since 1994. I oppose the proposed LBUSD development and agree with all the points made by Sensible Laguna, which they state far better than I could. In sum, the LBUSD proposal would drop an enormous outsized development in our nearly 100-year old historic neighborhood that cannot come close to absorbing the scale and impact that would follow.

Our neighborhood is called El Mirador and El Bosque and was developed in 1928, nearly 100 years ago. As stated in the attached State of California Historical Resources Inventory listing, our neighborhood was created by the Yoch Family that helped found Laguna Beach (Hotel Laguna, etc.) and is **"unlike any other in Laguna. It is the only neighborhood to be subdivided with a curvilinear street plan on a very gently sloping terrain"**.

Toward that end, I'm attaching the following two documents:

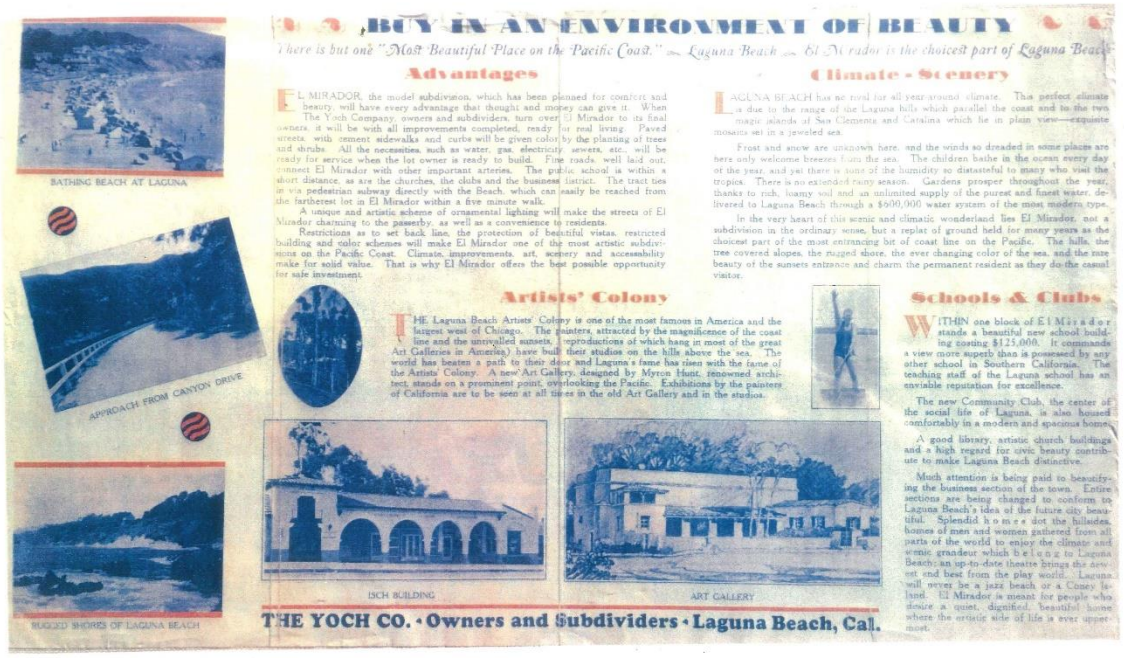
- State of California Historic Resources Inventory listing for our El Mirador and El Bosque neighborhood. The description details the uniqueness of our neighborhood as pictured in a street map including Short, Los Robles, El Bosque, Wilson and Catalina streets along with LBHS that remain as-is through today.
- The Yoch Family's original 1920s brochure offering lots in our neighborhood showing the same and surrounding streets noted in the Historical Resources Inventory listing. This layout and small scale of our neighborhood has not changed over the next 100 years and would be severely impacted by the LBUSD proposed development.

Our historic neighborhood is characterized by its narrow curved streets and eclectic traffic patterns that include many stop signs, speed bumps and a roundabout, which are not designed to accommodate the impact of the school district's proposed development.

Moreover, our main traffic arteries include Park and Legion, which are the only evacuation routes for us as well as many other residents and would be greatly impacted during and after the construction of LBUSD's proposed development.

I understand that the LBUSD has not performed any traffic or other impact studies on how its proposed development will affect our historic neighborhood. Clearly, that needs to be done before the LBUSD takes any other action. If those studies were performed, the obvious conclusion would be reached that the LBUSD's proposed development should not proceed as planned.

Please pass my comments in this email on to the appropriate decision makers.
Thank you,
Larry Zeman



BUY IN AN ENVIRONMENT OF BEAUTY

There is but one "Most Beautiful Place on the Pacific Coast." Laguna Beach. El Mirador is the choicest part of Laguna Beach.

Advantages

EL MIRADOR, the model subdivision, which has been planned for comfort and beauty, will have every advantage that thought and money can give it. When The Yoch Company, owners and subdividers, turn over El Mirador to its final owners, it will be with all improvements completed, ready for real living. Paved streets, with cement sidewalks and curbs will be given color by the planting of trees and shrubs. All the necessities, such as water, gas, electricity, sewers, etc., will be ready for service when the lot owner is ready to build. Fine roads, well laid out, connect El Mirador with other important arteries. The public school is within a short distance, as are the churches, the clubs and the business district. The tract ties in via pedestrian subway directly with the Beach, which can easily be reached from the fartherest lot in El Mirador within a five minute walk.

A unique and artistic scheme of ornamental lighting will make the streets of El Mirador charming to the passerby, as well as a convenience to residents.

Restrictions as to set back line, the protection of beautiful vistas, restricted building and color schemes will make El Mirador one of the most artistic subdivisions on the Pacific Coast. Climate, improvements, art, scenery and accessibility make for solid value. That is why El Mirador offers the best possible opportunity for safe investment.

Climate - Scenery

LAGUNA BEACH has no rival for all year-round climate. This perfect climate is due to the range of the Laguna hills which parallel the coast and to the two magic islands of San Clemente and Catalina which lie in plain view—exquisite mosaics set in a jeweled sea.

Frost and snow are unknown here, and the winds so dreaded in some places are here only welcome breezes from the sea. The children bathe in the ocean every day of the year, and yet there is none of the humidity so distasteful to many who visit the tropics. There is no extended rainy season. Gardens prosper throughout the year, thanks to rich, loamy soil and an unlimited supply of the purest and finest water, delivered to Laguna Beach through a $600,000 water system of the most modern type.

In the very heart of this scenic and climatic wonderland lies El Mirador, not a subdivision in the ordinary sense, but a replat of ground held for many years as the choicest part of the most entrancing bit of coast line on the Pacific. The hills, the tree covered slopes, the rugged shore, the ever changing color of the sea, and the rare beauty of the sunsets entrance and charm the permanent resident as they do the casual visitor.

Artists' Colony

THE Laguna Beach Artists' Colony is one of the most famous in America and the largest west of Chicago. The painters, attracted by the magnificence of the coast line and the unrivalled sunsets, (reproductions of which hang in most of the great Art Galleries in America,) have built their studios on the hills above the sea. The world has beaten a path to their door and Laguna's fame has risen with the fame of the Artists' Colony. A new Art Gallery, designed by Myron Hunt, renowned architect, stands on a prominent point, overlooking the Pacific. Exhibitions by the painters of California are to be seen at all times in the old Art Gallery and in the studios.

Schools & Clubs

WITHIN one block of El Mirador stands a beautiful new school building costing $125,000. It commands a view more superb than is possessed by any other school in Southern California. The teaching staff of the Laguna school has an enviable reputation for excellence.

The new Community Club, the center of the social life of Laguna, is also housed comfortably in a modern and spacious home.

A good library, artistic church buildings and a high regard for civic beauty contribute to make Laguna Beach distinctive.

Much attention is being paid to beautifying the business section of the town. Entire sections are being changed to conform to Laguna Beach's idea of the future city beautiful. Splendid homes dot the hillsides, homes of men and women gathered from all parts of the world to enjoy the climate and scenic grandeur which belong to Laguna Beach; an up-to-date theatre brings the newest and best from the play world. Laguna will never be a jazz beach, or a Coney Island. El Mirador is meant for people who desire a quiet, dignified, beautiful home where the artistic side of life is ever uppermost.

BATHING BEACH AT LAGUNA

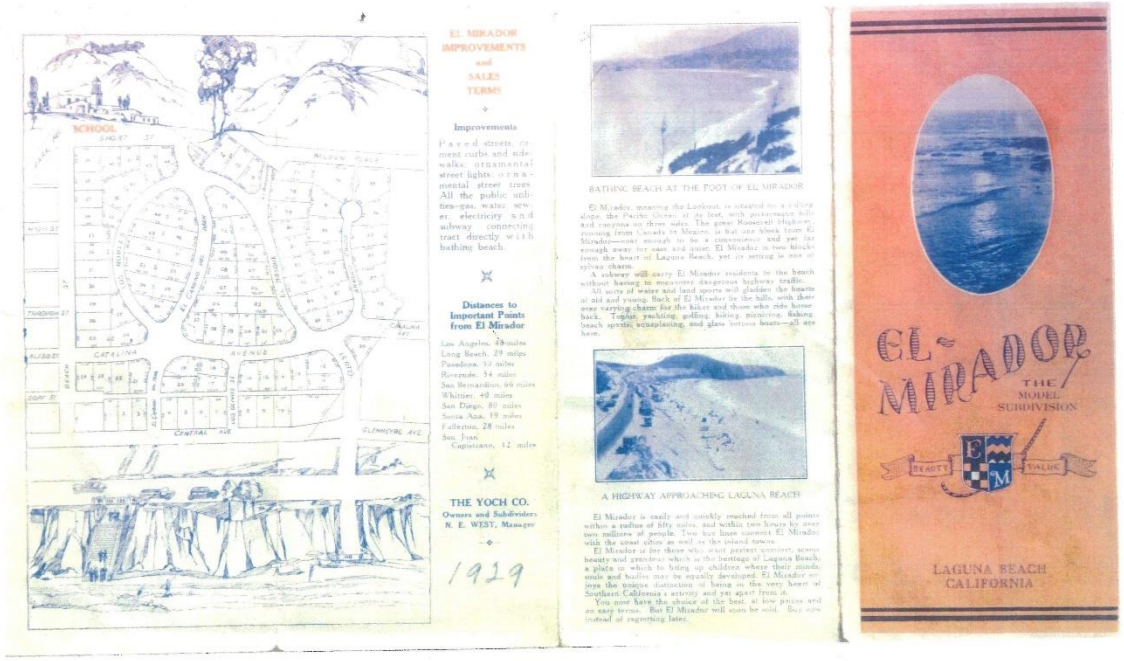
APPROACH FROM CANYON DRIVE

RUGGED SHORES OF LAGUNA BEACH

ISCH BUILDING

ART GALLERY

THE YOCH CO. · Owners and Subdividers · Laguna Beach, Cal.



EL MIRADOR IMPROVEMENTS and SALES TERMS

Improvements

Paved streets, cement curbs and sidewalks, ornamental street lights, ornamental street trees. All the public utilities—gas, water, sewer, electricity and subway connecting tract directly with bathing beach.

Distances to Important Points from El Mirador

Los Angeles, 49 miles
Long Beach, 29 miles
Pasadena, 50 miles
Riverside, 54 miles
San Bernardino, 66 miles
Whittier, 40 miles
San Diego, 80 miles
Santa Ana, 18 miles
Fullerton, 28 miles
San Juan Capistrano, 12 miles

THE YOCH CO.
Owners and Subdividers
N. E. WEST, Manager

1929

BATHING BEACH AT THE FOOT OF EL MIRADOR

El Mirador, meaning the Lookout, is situated on a rolling slope, the Pacific Ocean, 50 feet, with picturesque hills and canyons on three sides. The great Roosevelt Highway, running from Canada to Mexico, is but one block from El Mirador—near enough to be a convenience and yet far enough away for quiet and quiet. El Mirador is two blocks from the heart of Laguna Beach, yet its setting is one of sylvan charm.

A subway will carry El Mirador residents to the beach without having to maneuver dangerous highway traffic.

All sorts of water and land sports will gladden the hearts of old and young. Back of El Mirador lie the hills, with their ever varying charm for the hiker and those who ride horseback. Tennis, yachting, golfing, hiking, picnicing, fishing, beach sports, sculpturing, and glass bottom boats—all are here.

A HIGHWAY APPROACHING LAGUNA BEACH

El Mirador is easily and quickly reached from all points within a radius of fifty miles, and within two hours by over two millions of people. Two bus lines connect El Mirador with the coast cities as well as the inland towns.

El Mirador is for those who want perfect scenery, scenic beauty and grandeur which is the heritage of Laguna Beach, a place in which to bring up children where their minds, souls and bodies may be equally developed. El Mirador enjoys the unique distinction of being in the very heart of Southern California's activity and yet apart from it.

You now have the choice of the best, at low prices and on easy terms. But El Mirador will soon be sold. Buy now instead of regretting later.

EL MIRADOR

THE MODEL SUBDIVISION

BEAUTY EM VALUE

LAGUNA BEACH CALIFORNIA

State of California — The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

HISTORIC RESOURCES INVENTORY

Ser. No. 30-2651-14-D
HABS ____ HAER ____ NR 5D SHL ____ Loc ____
UTM: A 427700/3712560 B 427700/3711080
C 428120/3711080 D 428120/3712560

IDENTIFICATION

1. Common name: El Bosque Street Neighborhood
2. Historic name: El Mirador Tract
3. Street or rural address: Multiple
   City Laguna Beach Zip 92651 County Orange
4. Parcel number: Multiple
5. Present Owner: Multiple Address: ____
   City ____ Zip ____ Ownership is: Public ____ Private XX
6. Present Use: Single-family residential Original use: Same

DESCRIPTION

7a. Architectural style:

7b. Briefly describe the present *physical description* of the site or structure and describe any major alterations from its original condition:

The El Bosque Street neighborhood is located just south of Legion Street on land which was not subdivided until 1928. Only a few homes in the neighborhood were built prior to 1940, and they are itemized here; the vast majority of homes in the neighborhood date to the 1950's and 1970's. The neighborhood was subdivided with a curvilinear street pattern unlike any other neighborhood in Laguna.

The earliest hosues which remain were built primarily on the large corner lots afforded by the looped street configurations. These houses are larger estate type homes in the Mediterranean, Normandy and Provincial Revival styles popular during the 30's. The houses remain in excellent, unaltered condition.

Attach Photo(s) Here

8. Construction date: Estimated ____ Factual 1931-40
9. Architect Multiple
10. Builder Multiple
11. Approx. property size (in feet) Frontage 75' Depth 100' or approx. acreage ____
12. Date(s) of enclosed photograph(s) November 1980

DPR 523 (Rev. 4/79)

13. Condition: Excellent X Good ____ Fair ____ Deteriorated ____ No longer in existence ____

14. Alterations: ____

15. Surroundings: (Check more than one if necessary) Open land ____ Scattered buildings ____ Densely built-up ____
Residential X Industrial ____ Commercial ____ Other: ____

16. Threats to site: None known ____ Private development X Zoning ____ Vandalism ____
Public Works project ____ Other: ____

17. Is the structure: On its original site? X Moved? ____ Unknown? ____

18. Related features: Some with original garages.

SIGNIFICANCE

19. Briefly state historical and/or architectural importance (include dates, events, and persons associated with the site.)

The El Bosque Street neighborhood is unlike any other in Laguna. It is the only neighborhood to be subdivided with a curvilinear street plan on very gently sloping terrain. Houses are not oriented toward the ocean, but toward the inward looping configuration of the streets. This was the last of the low lying parcels beneath the foothills to be subdivided. On this land which remained vacant until subdivision in 1928, it is clear that the Yoch Co. (subdividers of the land) were attempting to provide for large estate lots rather than smaller lots tailored to bungalow beach cottages. This neighborhood has a more formal, less beach oriented quality, than others in the vicinity.

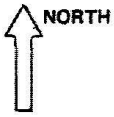
The early houses in the neighborhood, though they are few, are good examples of the Period Revival styles popular in Laguna through the 30's. In a neighborhood which is architecturally set apart from others in lower Laguna, it is important that the few early homes receive recognition.

20. Main theme of the historic resource: (If more than one is checked, number in order of importance.)
Architecture 1 Arts & Leisure ____
Economic/Industrial ____ Exploration/Settlement ____
Government ____ Military ____
Religion ____ Social/Education ____

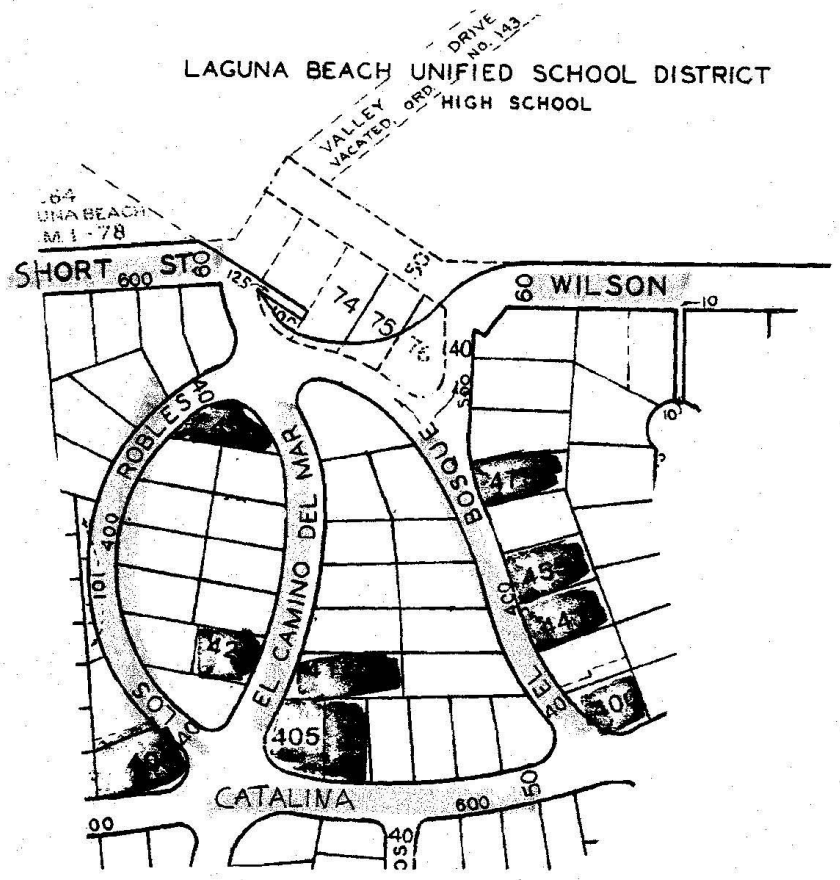
21. Sources (List books, documents, surveys, personal interviews and their dates).
Orange Co. Assessor's Records
Laguna City Directories, 1932-45
South Coast Newspaper

22. Date form prepared May 1981
By (name) Kathleen Les
Organization Environmental Coalition
Address: 206 W. 4th St., Ste. 316
City Santa Ana Zip 92701
Phone: (714) 836-4314

Locational sketch map (draw and label site and surrounding streets, roads, and prominent landmarks):



EL BOSQUE NEIGHBORHOOD



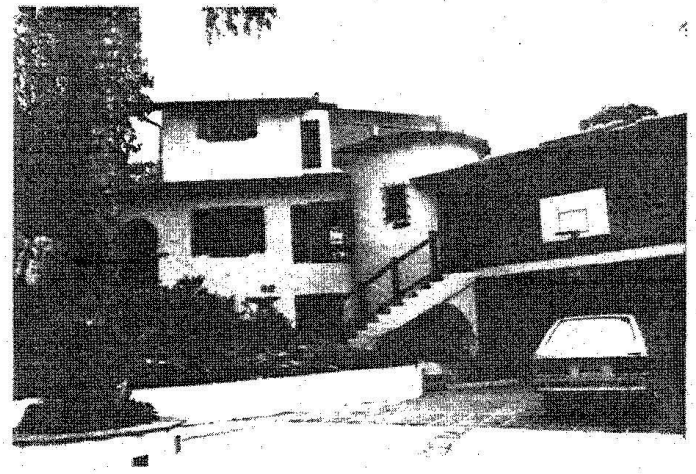


1. 400 El Bosque 1931 (C)

A Provincial Revival house with an "L" plan in front and a large octagonal turret in the apex of the "L". The gabled roof is steeply pitched and sheathed in shingle finishing as is the conical roof on the turret. Entry is recessed with brick lining the inset area. The house is finished in textured stucco and sits on a large corner triangular lot.

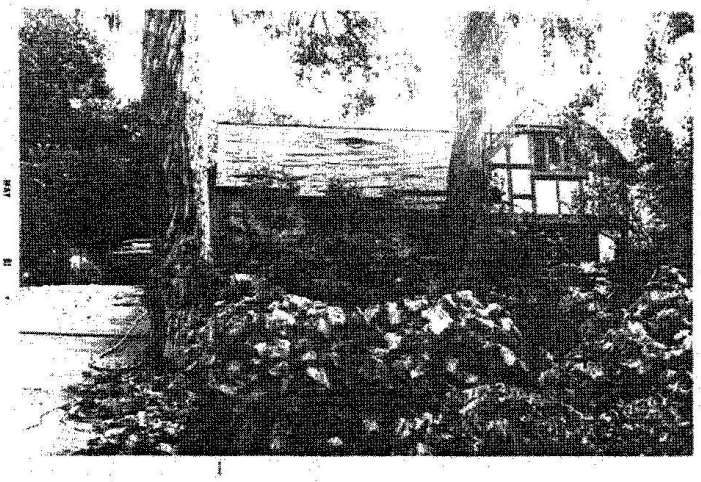
This house was built for Mr. and Mrs. Allen Sewell of Toronto, Canada. He had been a captain of the Royal Field Artillery during W.W. I and was a landscape gardener at the time the house was built. It was designed by architect Robert Coleman, Jr.

PAGE 4 OF 5



2. 441 El Bosque 1931 (K)

A three-story Spanish Mediterranean Revival with characteristic flat tiled roof and stucco siding. The house has an irregular plan arranged in a slight "C" formation and is distinguished by a large corner turret with spiral stairway leading to the arched door. This forms the main entry to the house. An arched walk through leads to the side yard on the ground level. The casement windows are predominantly shuttered.



3. 455 El Bosque 1932 (E)

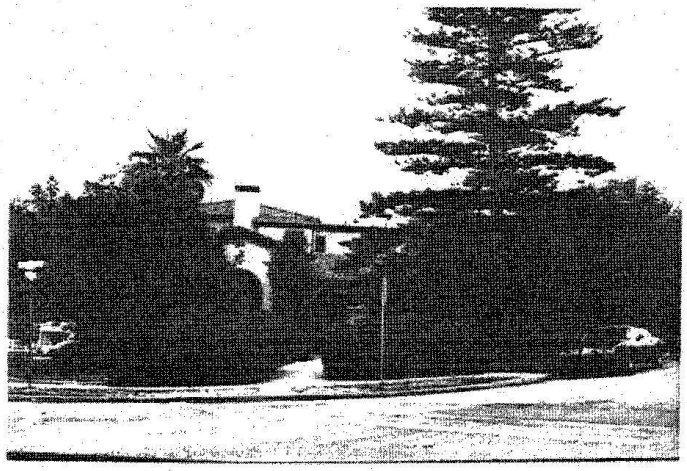
A Normandy Revival house set back on a sloping lot. The house incorporates a rectangular plan with a gabled roof and stucco siding. Tiled ridges and wavy shingles embellish the roof while half-timbering embellishes the faces below. Large multi-paned casement windows are present throughout. Entry is at center beneath a slight roof overhang. A detached garage is below at street level.



4. 475 El Bosque 1932 (K)

An "L" plan bungalow of one story which sits high on an elevated lot and is reached by a meandering brick pathway. The house has a gabled roof and is sheathed in clapboard. Wood shutters frame the multi-paned casement windows. A detached garage is below at the street level.

Margaret Wilder Sheppard, water colorist and artist, lived here as of 1946.



5. 400 Los Robles ca. 1930 (estimate) (K)

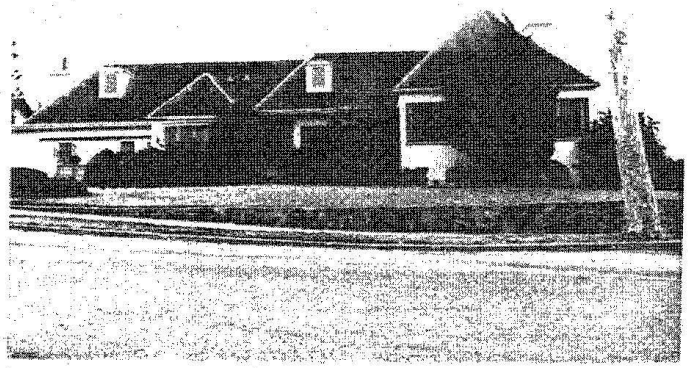
A large Mediterranean Revival house on a triangular corner lot. The house has a varied roofline sheathed in tiles that punctuate the various projecting wings of the house. The main entry is recessed beneath an arcaded porch with arched openings and wide piers. Windows are all slightly recessed and framed in wood. A large recessed arched window adorns the main front-facing gable. The house is two stories with the second story set back over the rear portion of the main body.



6. 654 Catalina 1930 (K)

A Mediterranean Revival bungalow with "L" plan, multi-gabled roof and textured stucco siding. A full length porch supported by large piers extends from the front-facing gable across the front. Mediterranean embellishments include tile ridges on the roof, tiled gable venting, brick chimney with tiled cap and large square openings in the porch.

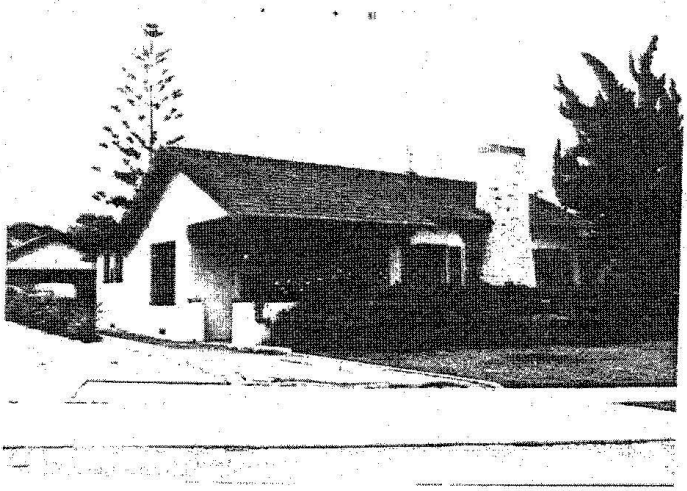
This Mediterranean Revival house was designed by Aubrey St. Clair and lived in from 1935-78 by the Joseph Andrus family. Mr. Andrus is the founder and proprietor of Andrus Plumbing, one of the oldest plumbing businesses in Laguna Beach.



7. 405 El Camino del Mar 1940 (K)

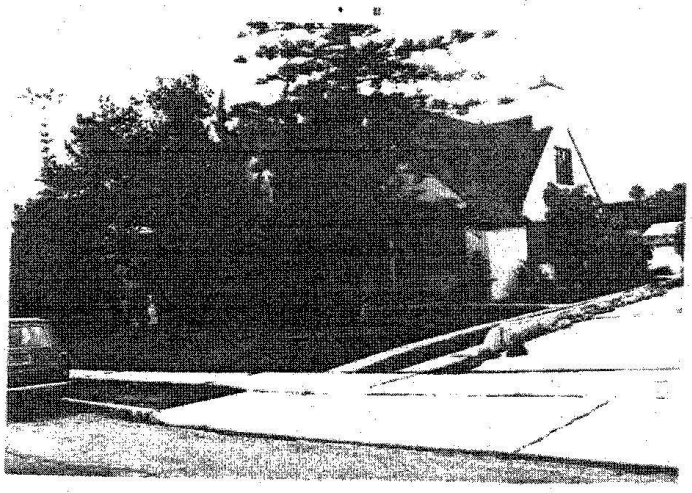
A Normandy Revival style house of one story with a hipped roof and stucco finishing. Tiled ridges enhance the roofline. Below, the house is configured in an "L" plan. Entry is at center and is embellished with Colonial pilasters.

This house was built by the contracting firm of Ropp & Mackey for H.P. Walden of Pasadena.



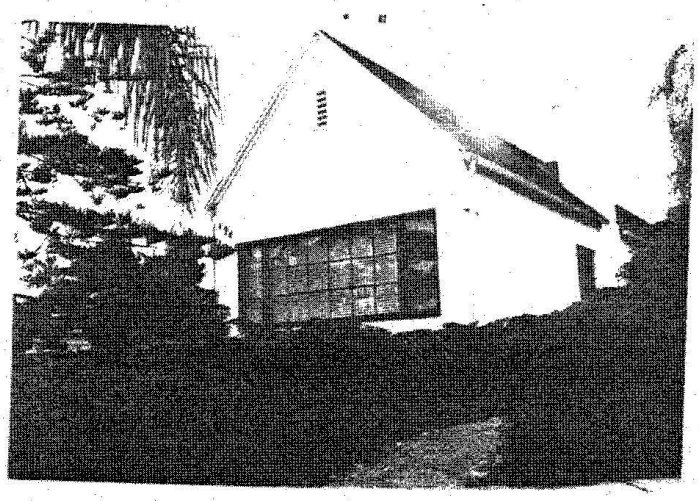
8. 417 El Camino del Mar 1932 (C)

A low-to-the-ground Mediterranean Revival influenced house with a gabled roof and recessed entry porch. House is finished in textured stucco and also includes a tapered brick chimney. Multi-paned casement windows are used throughout.



9. 420 El Camino del Mar 1940 (K)

A Provincial Revival house with box plan and steep-pitched multi-gabled roof. Double front-facing gables provide the primary architectural focal point; entry is on the side of the forwardmost gable. Multi-paned casement windows are shuttered.



10. 494 El Camino del Mar ca. 1940 (estimate) (C)

A large Provincial Revival house which occupies a rounded corner lot. The house has a steep-pitched gable roof with a contrasting smaller front-facing gable. Entry is at center beneath the roof overhang. A large stucco chimney is also on the front face.

ATTACHMENT F: COMMENT LETTER F

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

comments regarding pool moderinization MND document

2 messages

Chris Alonso <thebigspooky@gmail.com> Mon, Feb 17, 2025 at 3:49 PM
To: ewahlstromrogers@lbusd.org
Cc: Mary Alonso <alonso.mc@gmail.com>

Hi Elia et al -

I am writing as a local resident and neighbor of the high school to register my concerns about the Mitigated Negative Declaration document regarding the "pool modernization project".

Our concerns are related to the environmental impacts for residents in the local neighborhood. The document seems to dehumanize the considerable impact this will have on local residents. Specifically -

- Construction Noise - the document outlines about 14 months of considerable noise, vibrations, and related construction effects. As a local resident home during the day (with a senior dog and 2 nervous cats) this is a major impact on our peace and wellbeing. And if the project is not on time, this could last for years.
- Construction Parking - the document seems to ignore the impact of local residents on losing access to street parking during the construction period - this is where many local residents park.
- Noise & Lighting Impact of finished project - we have concerns about the increased noise and light pollution that seems likely from a project with increased capacity. I saw no reference or study for how the new lighting system will impact residents, their views, the ability to enjoy the evening sky, just "add 40 foot light poles". This seems to be minimizing the impact of the project, not genuinely trying to measure and assess the impacts to the local community.

I look forward to continuing this discussion at the community hearing on March 13th.

Chris Alonso

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org> Thu, Feb 20, 2025 at 4:21 PM
To: Chris Alonso <thebigspooky@gmail.com>
Cc: Mary Alonso <alonso.mc@gmail.com>

Hi Chris and Mary,

Thanks for submitting your comments regarding the CEQA process for the Laguna Beach High School Pool Modernization Project. Your input has been received. If you have any additional questions, please do not hesitate to reach out.

[Quoted text hidden]

--

All the best,

Elia Wahlstrom Rogers (she/her)
Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont St. | Laguna Beach, CA 92651
949-497-7700 Ext. 5240
Website | Instagram

ATTACHMENT F: COMMENT LETTER G

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

Proposed high school pool modifications
2 messages

Laura Tarbox <laura@tarbox.com> Wed, Feb 19, 2025 at 4:30 AM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

I AM SORRY THIS IS LATE! I WAS TRAVELING OUTSIDE THE COUNTRY AND HAD TROUBLE WITH MY EMAIL AND I JUST NOW REALIZED IT HAD NEVER SENT!

I have lived in my home at 812 Manzanita for 16 years. I am right above the high school tennis courts, and adjacent to the pool. I am just sick to think of what will happen to my lovely neighborhood and quality of life if this project goes ahead at the currently proposed scale. This is a project that is not needed in a district and community of our size simply to benefit a relative few students.

Notwithstanding the cost, overall environmental impact of increased water usage, lighting, and pollution from more traffic, and considerations of how funds might be better spent to benefit a larger number of students, I am obviously concerned about the direct impact on our properties that are immediately adjacent to the pool. It is disingenuous for anyone to say that usage and traffic will not increase with the increased size of the pool. Already, there is very little parking availability, lots of noise, and people pulling in and out of my driveway constantly to turn around. (A large planter with a cypress tree on the front side of my garage was recently left smashed on my driveway due to this activity, so I am looking into barriers or a gate across my driveway to stop people from using it in this manner.)

Much has already been written by impacted residents, but the lighting, decreased views, and increased noise and usage is untenable in this already tight space. Yes, I bought my home knowing I am next to these facilities, but I could not have imagined there would be anyone who would ever think there was room for expansion in this already small footprint. What I did not understand was the lack of recourse we have as residents and citizens, and I had thought our School Board would be more considerate of the neighbors and taxpayers in this community, especially when a compelling need case has not been made. It is insane to me that a few parents have been able to push this forward for their kids at the expense of other kids not playing water polo or swimming, as well as the local residents who will be impacted long after their kids are gone.

Please consider going with a smaller, less expensive option, keep in mind impacted views, and look at adding noise and light mitigation as has been requested by other neighbors.

Sincerely,

Laura

Laura Tarbox, CFP®

Founder & CEO

TARBOX FAMILY OFFICE

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Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org> Thu, Feb 20, 2025 at 4:18 PM
To: Laura Tarbox <laura@tarbox.com>

Hi Laura,

Thanks for submitting your comments regarding the CEQA process for the Laguna Beach High School Pool Modernization Project. Your input has been received. If you have any additional questions, please do not hesitate to reach out.
[Quoted text hidden]
--
All the best,

Elia Wahlstrom Rogers (she/her)
Administrative Assistant, Facilities
Laguna Beach Unified School District
550 Blumont St. | Laguna Beach, CA 92651
949-497-7700 Ext. 5240
Website | Instagram

ATTACHMENT F: COMMENT LETTER H

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

LBHS Pool Modernization Project
1 message

Patrick Stoner <pgs92651@icloud.com> Sun, Feb 16, 2025 at 10:00 AM
To: ewahlstromrogers@lbusd.org

The MND proposal is rife with errors and omissions, and therefore misleading to the public. There is reference to appendices that do not exist in the body of the proposal. A new report needs to be revised and submitted. As a neighbor, my concerns are lighting, noise, traffic, emergency evacuation, and quality of life.

Lighting needs to have a height restriction and shielding.

Noise from activities in the pool are swimming and water polo, with the latter generating significantly higher noise levels. There is no mention of water polo in the body of the MND, only swimming. Additional noise will be generated from 270 potential spectators.

In view of the LA fires, we must be vigilant concerning emergency evacuations. Park Avenue is the main artery from Top of the World, Thurston, and the Village Area. Construction traffic is a major impediment to an organized evacuation.

My last concern as well as most residents and visitors is parking. Where are 270 spectators going to park I an already congested neighborhood?

concerned neighbor,

Patrick Stoner

ATTACHMENT F: COMMENT LETTER I

LBUSD

Elia Wahlstrom Rogers <ewahlstromrogers@lbusd.org>

LBUSD Pool Modernization Comments re MND
1 message

Steve Brown <brown.steve1265@gmail.com> Sun, Feb 16, 2025 at 5:06 PM
To: "ewahlstromrogers@lbusd.org" <ewahlstromrogers@lbusd.org>

Here are my comments regarding the CEQA document related to the Laguna Beach High School Pool Modernization Project Initial Study and Mitigated Negative Declaration (IS/MND).

Comment Period Related Issue

The comment period does not adequately comply with CEQA requirements:

- The MND was published by LBUSD on January 17, 2025 per the mailing, but public notification was postmarked January 21 and arrived by January 23. This caused a cumulative 6-day delay or about 20% of the response time expected under CEQA. The public comment period per the documentation provided is from January 17 to February 17, 2025.
- Care should be taken to ensure the public has had enough opportunity to review the materials and comment. To ensure adequate public review, consider revising and resubmitting the documents for comments.

Significant Structural Issues

Critical Appendix information is not included:

- The document states, "Technical studies and other documents, which include supporting information or analyses used to prepare the IS/MND, are included in the following appendices," yet these are not provided.
- This information is important as it is referenced multiple times throughout the document for technical support regarding mitigations and analysis.
- Appendices are technical in nature and designed to support mitigations discussed, but they were not made available to the public at the start of the 30-day review period, thus the CEQA process is incomplete. It is challenging to determine the environmental impacts or benefits of mitigation measures without these appendices due to their significance to the document and project.
- The missing appendices identified in the document are stated as follows: Appendix A1 Project Plans; Appendix A2 Estimated Construction Schedule; Appendix A3 Logistics Site Plan; Appendix B CalEEMod Input and Results for Air Quality Analysis; Appendix C Biological Resources Assessment; Appendix D Cultural Resources Assessment; Appendix E1 Geotechnical Report; Appendix E2 Paleontological Records Search; Appendix F Environmental Radius Report; Appendix G Ambient Noise Measurement Data; Appendix H Limited VMT Analysis.
- Please attach all exhibits and resend the entire document to the public once updated so that the review can be completed.

Document appears to incorporate significant erroneous information from unrelated consulting projects or other sources that are inapplicable to the Laguna Beach IS/MND:

- Significant errors in the document suggest a possible "cut and paste" approach by the consultant, utilizing content from prior unrelated projects rather than focusing on the Pool Modernization Project in Laguna Beach. These errors should have been identified and corrected during district and other reviews but were not.
- Due to the document's design, it is not clear to the public whether issues are confined to specific sections or if other areas, particularly those with technical content, pertain to the environmental impact area in question in Laguna Beach, elsewhere, or are from entirely different projects.
- These inconsistencies are scattered throughout the document, leading to structural issues that raise questions about whether the public is reviewing information pertinent to the Laguna Beach

project, another district project, or elements of both. The report should be thoroughly reviewed and revised. In its current form, multiple issues within the CEQA analysis would require mitigation if included.

Examples of such issues present throughout the document include such things as:

- References to an airport and "nearby" schools that are located 80 miles or more inland and away from Laguna Beach. This has no relevance.
- Other discrepancies also exist. For instance, the term "project" is contextually appropriate, but in other places, it shifts to "school," which is not correct for this project. This indicates content from another document was incorporated with unknown impact or relevance. Schools versus projects have different potential environmental impacts, so this must be clarified.
- Beyond adding confusion, there are numerous references that could necessitate mitigation not considered in the document, potentially due to copy-paste errors or inadequate review.

Examples provided and many others not listed may have been copied from unrelated documents:

- Mismatches in pool dimensions (50 meters vs 45 meters)
- Multiple conflicting lighting specifications (40-foot poles more suited for a football field vs 24-foot poles similar to nearby tennis courts)
- Planting plans involving trees that could obstruct views (after stating views are not obstructed) like the Mexican Fan Palm (100 feet maximum height), Marina Strawberry Tree (40 feet), Giant Bird of Paradise (30 feet) and Red Rocket Crape Myrtle (20 feet)
- Intermingling shifting terms for the project (may have come from other sources or documents) such as aquatic center, aquatic facility, aquatic complex and swimming pool
- Given these issues, many references do not relate to the Laguna Beach project. Please revise and update the document comprehensively. Ensure all supporting documentation, exhibits, and appendices are accurate to prevent misleading the public. Once revisions are complete, reroute the entire document with attachments for public input. The current document lacks cohesion and does not support a reasonable public review related to CEQA; therefore, it should be corrected and resubmitted for review.

The document does not address the unique environmental impact of water polo:

- The project description does not specifically mention that the proposed aquatic center will be heavily used by water polo teams and is designed to host CIF events.
- The document states that "the facility improvements may increase the public's use of the pool area and may also attract more visitors during swim meets." However, it does not address any potential impact related to water polo. This could be a significant environmental impact that has not been included in the analysis.
- Throughout the planning process for a new aquatic center and addressing the needs of aquatics athletes and city usage (including water polo clubs), the District and School Board have frequently stated that the increased size of the pool and design are primarily needed to support water polo.
- The sport of water polo has several potential environmental factors (noise, lighting, traffic, etc.) that should be addressed under CEQA. These elements need to be incorporated into the document and properly analyzed.
- For example, water polo generates more noise than swimming, with frequent referee whistles and horns. A typical water polo game whistle (Fox 40) can reach a sound level of 115 decibels, which is very loud and audible even in a noisy pool environment.
- Bodet Sport, a manufacturer of water polo scoreboards, indicates that integrated horns of 90 decibels are built into its systems and used to announce stoppages of play.
- According to the American Speech Hearing Association, humans can listen to sounds at 70 decibels or less for as long as desired. Sounds at 85 decibels can lead to hearing loss if listened to for more than 8 hours. Sounds over 85 decibels can damage hearing more quickly, cutting safe listening time in half for every 3-decibel rise over 85. For instance, humans can listen to 88-decibel sounds for 4 hours and 91-decibel sounds for only 2 hours.
- A 115-decibel sound, such as the water polo whistle, exceeds the "average human pain threshold" of 110 decibels according to Purdue University. This information should be incorporated into the document, and mitigations should be provided.
- The document measures noise levels at various points around the pool specifically when lap swimming is occurring and not during water polo practices, games or tournaments. Measuring noise

during periods of lap swimming does not accurately reflect the impact of CEQA on water polo games and tournaments. More rigorous sound testing should be conducted in other areas around Manzanita and beyond the tennis courts.

The impacts of sound, light, usage, and noise have not been fully analyzed under CEQA.

- The document mentions that usage should not increase materially; however, projections in the same document indicate that energy demand will be 64% higher and solid waste generation will increase by 47%. These metrics suggest increased activity and significantly more people using the facility than currently observed. This requires further analysis and appropriate mitigation for sound, noise, traffic, and light issues.
- Previous documentation and presentations to the public indicate that this design primarily supports increased water polo activities, including high school, club, and other events. That documentation and statements by administration and board members have indicated the primary driver for the larger pool need relates to the significant growth in this sport so expansion is necessary to accommodate it.
- It has also been indicated that the high school men's team plays its games at other pools due to the current pool's limitations, and a new pool would support bringing these games back to the area.
- These factors increase activity in the pool space, boost noise levels, and impact other environmental factors that should be addressed in the document.
- Claiming there is no change contradicts your prior statements and is inaccurate. This section should be reviewed and updated accordingly to incorporate and reflect these considerations, with further mitigations (such as replacing fencing with a sound attenuating solid wall on the tennis court side of the pool similar to the design over the new stadium seating, adjusting the height of light poles, etc.) to address CEQA-related issues.
- Sound attenuation walls are needed around all sides of the pool to block noise.

The lighting environment analysis under CEQA is incomplete:

- The document overlooks potential light leakage from a larger scoreboard, despite CIF requirements related to bigger pool sizes and audience viewing capability.
- There is no mention of automatic light shut off or operating hours, seen in similarly close residential proximity as 8 am to 8pm.

Key factors have been omitted that are important elements under CEQA:

- While swimming is mentioned 42 times, polo, water polo, tournaments, and team usage times are omitted. These aspects are typically included in similar CEQA analyses and discussed in reports from other schools to mitigate environmental impacts and should be included for proper analysis.

Other CEQA-related Issues

Project Location is indicated as 625 Park Avenue but it should be 670 Park Avenue

- The school administration building is at 625 Park Avenue, while the current pool is at 670 Park Avenue, where the new pool is also expected to be located. It is important to clarify this, as the CEQA impact has been assessed for 670 Park Avenue.

Proposed project is surrounded by residential structures

- While CEQA does not have a set distance in feet from a project that it covers, as its scope is determined by the potential environmental impact of the project, not just its proximity certain standards are used.
- When notifying property owners, local jurisdictions often use a range of 300-500 feet from the project site to ensure adequate public awareness. The District reported it used 500 feet for this.
- Simple analysis using Google Earth finds there are at least 74 homes surrounding the proposed pool area from edge of pool that are as little as 35 feet up to 500 feet away (plus 2 schools of Anneliese + the high school campus; 1 hotel with 5 rooms and 1 church).
- This should be updated to indicate the project is surrounded by residential structures on ALL SIDES EXCEPT for the area along Park where the high school sits.

- Total area impacted includes homes on Virginia Park, Griffith, St Anns, Manzanita, Park, Skyline and La Vista (plus the schools, hotel and church). The document should be updated to include those areas and sound, light, and traffic mitigated further.

Lighting - Light poles are discussed as being either 24 feet or 40 feet tall.

- The environmental impact from lighting needs clarification based on pole height and design. The taller height (40 feet) is more akin to what one would expect surrounding a football field, while the smaller height (24 feet) are more similar to what currently exists on neighboring tennis courts.
- Depending on the height and design of these, the environmental impact from light is unknown until that is clarified and cleaned up in the document.

Pool Size / Increased Usage - Size goes from 25 meters to 45 meters, an 80% increase.

- The increased size will support simultaneous multiple practices and CIF-sponsored events, resulting in more people, traffic, and noise.
- These impacts need to be addressed properly in the document and rerouted for additional public input.

Traffic and Wildfires – Recent fires in LA highlight the importance of traffic and wildfire mitigation, especially since Park Avenue is a major evacuation route near schools.

- Traffic flow and timing during the day need better addressing.
- Police presence for active traffic control is necessary.
- The movement of dump trucks between classes adds risk and should be mitigated.

Analysis of Critical Evacuation Route on Park Avenue is Incomplete

- Park Avenue is crucial for evacuations, requiring police presence during construction for safety. Mitigation plans need to address these concerns.

Hazardous Chemical Analysis Is Incomplete

- Roughly doubling the amount of acid and chlorine tanks on site given 80% increase in pool size should be reanalyzed and mitigated.
- Chemicals on hand are within 15 feet of a home and around kids at the school
- This should be better identified, addressed and mitigated

Regards,
Steve Brown

ATTACHMENT F: COMMENT LETTER J

The following is my response to the LAGUNA BEACH HIGH SCHOOL EXPANSION Initial Study and Mitigated Negative Declaration (IS/MND)

The following are observations of statements, actions, data and proposed mitigations contained in the document. Addressing some of the findings, in no particular order.

4.0 ENVIRONMENTAL CHECKLIST

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or as a "Potentially Significant Unless Mitigation Incorporated," as indicated by the checklist on the following pages.

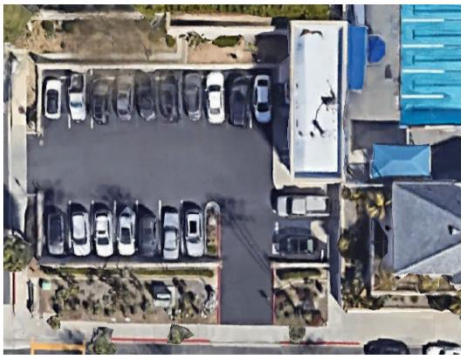
☐ Aesthetics	☐ Agricultural & Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology / Soils	☐ GHG Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

Project Access and Parking

The development of the project may require a minor reduction in the number of existing parking spaces in the lot adjacent to the pool area from its current 15 spaces to seven with one ADA compliant stall.

There are currently 17 parking spaces and 2 ADA Spaces. This is actually a 60% reduction in standard parking spaces and a 50% reduction in ADA Parking Spaces. See the photos below.

17 Parking Spots + 2 ADA



The 2 Current ADA Spots



4.1 Aesthetics

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, outcroppings, and historic buildings within a state scenic highway?				X
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

d) Would the project create a new source of substantial light or glare which would

adversely affect day or nighttime views in the area?

Less Than Significant Impact

The proposed project would include interior and exterior lighting similar to existing lighting for the pool and pool building, for visibility and security purposes. Construction and operation of the project would adhere to the City of Laguna Beach's Municipal Code § 7.70, Good Neighbor Outdoor Lighting regulations (City of Laguna Beach, 2024c), which would be reviewed and approved by City staff to ensure that light and glare from project components would be less than significant.

The statements pertaining to light, reflection / glare are unsubstantiated, as there appear to be no tests, or measurements showing data to support.

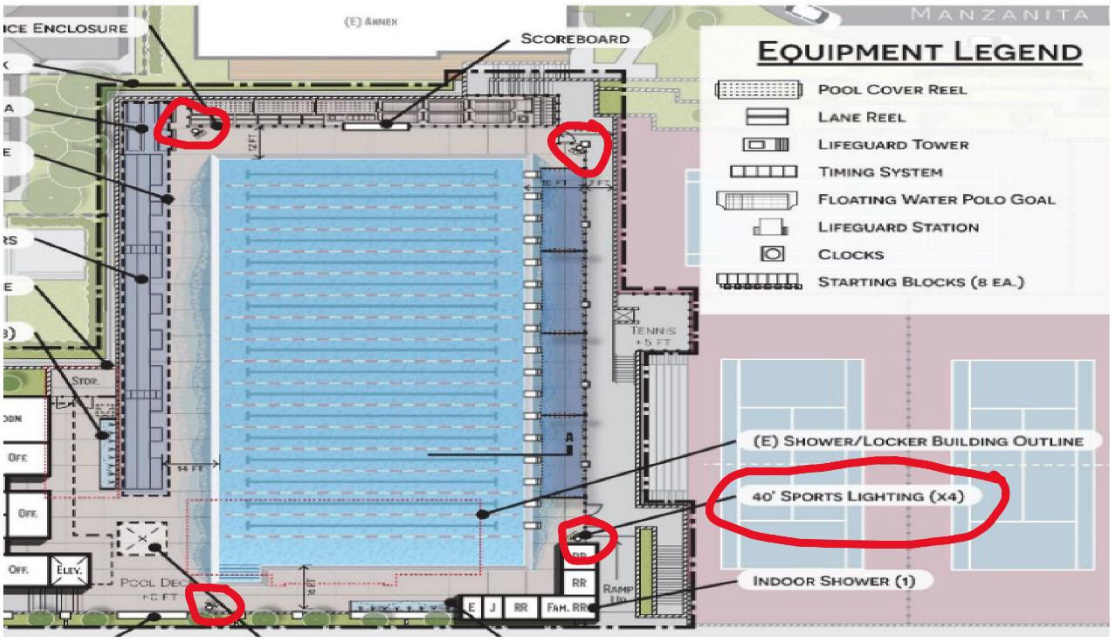
See responses below:

POOL LIGHTING

To provide lighting for the proposed project, a site lighting design consistent with the existing site light pole height at the existing pool and tennis court area (approximately 24'-0" in height) is being proposed.

This is conflicting information as the Proposed Plan Drawing Figure 3.3-3 calls out for 40' lights X 4. See below

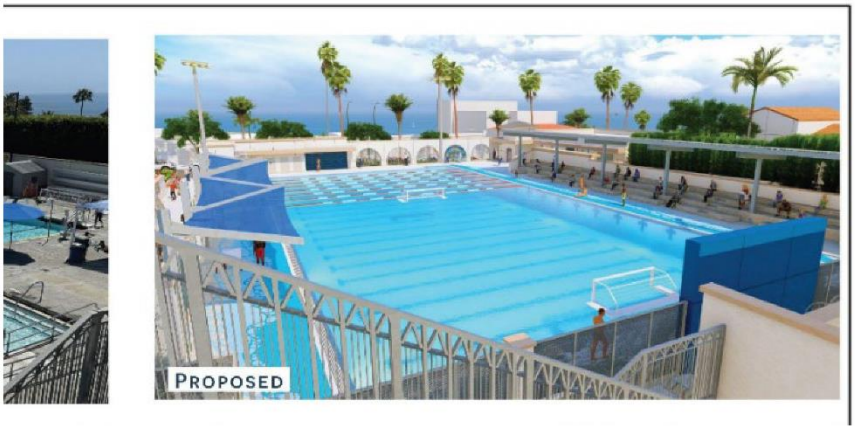
Figure 3.3-3
PROPOSED SITE PLAN



Solar water heating and solar photovoltaic panels. Solar water heating and solar photovoltaic panels are proposed on west, north, and east side of pool (as delineated in Figure 3.3-8) While shown in Figure 3.3-8,

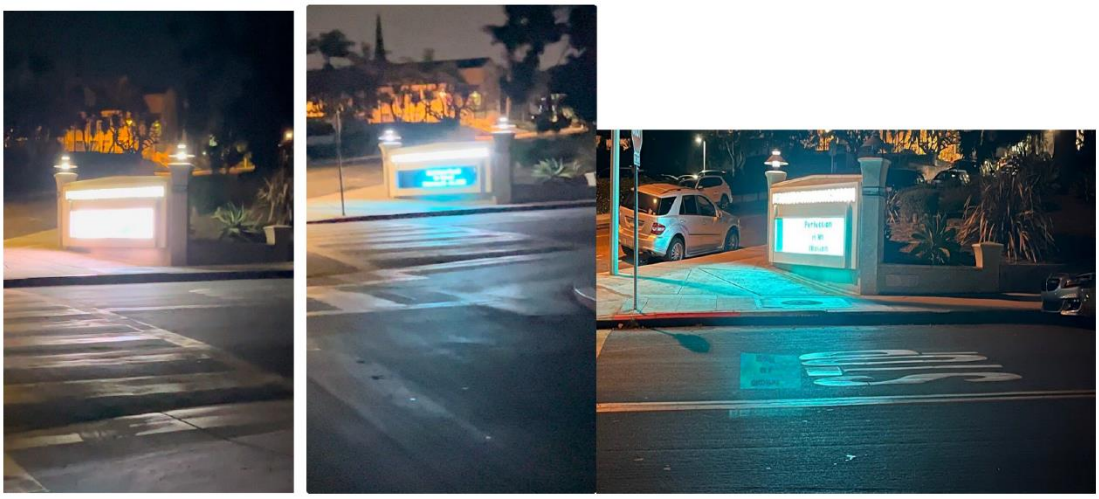
This contradicts Figure 3.3-9, the Project Comparison View, where Solar Panels are not shown.

Figure 3.3-9
PROJECT COMPARISON VIEW



While the District states it will adhere to the City of Laguna Beach's "Good Neighbor Lighting Policy", The district's current action pertaining to lighting is not following the City Policy. See the photos below.

The District Sign at the corner of Legion, Park & Short St. that is illuminated 24-7. Years ago, this sign would shut off at 7 – 8:00 PM. After being updated several years ago with extra bright LEDs, the cut off time was eliminated. The district has ignored requests to remedy the situation. The light is very disruptive to a sleepy residential area and against the City Sign Ordinance and the City Good Neighbor Lighting Policy.



The scoreboard is often left on as ambient lighting. Note light leakage



Into the neighboring properties. See the Red reflection on palm trees.

Tennis court lighting continues to be illuminated long after players have left courts. Many times after 10:30 PM, despite several mentions and requests to change how the lights operate.

When the pool was moved into the current space from the school quad, the neighbors were promised no and low lighting, sound mitigation / restrictions and early stops to practices and events. None of which have been followed or recognized. These reasons, combined with the inconsistencies in the Mitigation document, bring a general distrust of the process.

4.3.5 Sensitive Receptors
Some people, such as individuals with respiratory illnesses or impaired lung function because of other illnesses, persons over 65 years of age, and children under 14, are particularly sensitive to certain pollutants.
The nearest sensitive receptors to the project site include the portion of the Laguna Beach High School campus across the street and single-family residences about 25 feet away from the swimming facility.

There are many residents over the age of 65 years within the proximity of the pool project. This needs to be taken into consideration.

4.3.6 Applicable South Coast Air Quality Management District Rules
Rule 403 (Fugitive Dust Rule)
During construction, the project would be subject to SCAQMD Rule 403 (fugitive dust). SCAQMD Rule 403 does not require a permit for construction activities, per se; rather, it sets forth general and specific requirements for all construction sites (as well as other fugitive dust sources) in the SCAB. The general requirement prohibits a person from causing or allowing emissions of fugitive dust from construction (or other fugitive dust sources) such that the presence of such dust remains visible in the atmosphere beyond the property line of the emissions source.

Many of the above mentioned "Sensitive Receptors" over 65 years are downwind and could be adversely affected by fugitive dust and toxins.

Regional Operational Emissions
The project proposes the improvement and modernization of the existing pool facility located at Laguna Beach High School in Laguna Beach, California. Laguna Beach High School will have an enrollment of 750, serving grades 9 through 12 in Fall 2026 with an expected decrease in the future (LBUSD, 2023). The project would not increase student capacity at the school and would not involve temporary relocation of students or staff during construction. However, the facility improvements may increase the public's use of the pool area and may also attract more visitors during swim meets.

At this point, it is my understanding that the City and the District do not have an agreement in place for future use just yet and certainly not in January 2025.

4.9 Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact

The construction and operation of the project may involve the use of small amounts of hazardous materials such as fuels, lubricants, solvents, and fertilizers. Hazardous materials would be used, transported and disposed of in accordance with existing regulations of several agencies, including the US Environmental Protection Agency; US Department of Transportation; Department of Toxic Substances Control; Occupational Safety and Health Administration; and Division of Occupational Safety and Health. Construction impacts involving hazardous materials would be less than significant after compliance with such regulations.

It seems that the above statement is only applicable to the construction aspects pertaining to hazardous materials and chemicals. There is no mention of the typical chemicals used in pool operations and maintenance. Typical hazardous materials used include chlorine, perlite, and muriatic acid. There is no mention how the transportation and handling of these materials would mitigate any potential hazard.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable disturbance and accident conditions that involve the release of hazardous materials into the environment?

The ERR concluded that there were no hazardous materials sites on or adjacent to the project site (NETROnline, 2024). The construction contractor would maintain supplies and equipment to contain and clean up small spills of hazardous materials during construction and maintenance. Workers would be trained in their

proper use. In the event of a release of hazardous materials of toxicity and/or quantity that onsite personnel could not safely contain and clean up, the construction contractor would immediately notify the Hazardous Materials and Waste Branch of the Orange County Environmental Health Division, which is responsible for emergency responses to hazardous materials releases in Orange County. Therefore, the construction of the project would have a less than significant impact.

Again, no mention of the "Operation" of the pool and any details pertaining to the mitigation of potential accidents. No description of what quantity of the chemicals will be stored on site and how. Capacity of tanks to hold the chemicals and no description of the process should there be a Chemical spill within the pump room, etc.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
Less than Significant Impact

Tony Tobin Elementary School is located approximately 0.25 miles east of the project site (Google Earth Pro, 2024). No other schools are within a radius of 0.25 miles of the project.

This school is nowhere near Laguna Beach. Obviously, a cutting and pasting of information.
Annalise Pre-School is 1 block away and of course the pool is being built on LBHS property.

Construction
Project construction would involve use of small amounts of hazardous materials such as fuels, lubricants and fertilizers. Such materials would be used in accordance with existing regulations of several agencies. The use of such materials onsite would not pose substantial hazards to persons at Tony Tobin Elementary School.
Operation
Project operations would involve handling small amounts of hazardous materials, such as cleaners, solvents, and fertilizers. However, these materials would not be stored on site and would be handled and disposed of according to applicable regulations and would not be used or stored in amounts that would pose a hazard to people at Tony Tobin Elementary School. Therefore, the project would have a less than significant impact in this regard.

While Operations are mentioned, the actual pool chemicals are not. Again no information on storage, etc.

Table 4.9-1
CORTESE SITES ON AND WITHIN 0.5 MILE OF THE PROJECT SITE

Site Name Address Distance and Direction from project site	Additional information
Monte Verde Road/Via Pascal 45585 El Chimisal Road Opposite Via Pascal from east end of project site	School Investigation Site Denha High School AKA High School No. 3 No action required in 2001
Monte Verde Road/Via Pascal 45585 El Chimisal Road Opposite Via Pascal from the from the east end of the project site	School Investigation Site Morgan Hill Elementary No action required 2002

Source: NETROnline, 2024. See **Appendix F.**

The Cortese sites noted above are not within .5 Miles of the project site.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The nearest public-use airport to the project site is the French Valley Airport, approximately eight miles northwest of the project location (see Figure 4.9-1). The project site is outside of the French Valley Airport zones, where land uses are regulated to minimize aviation-related hazards to people on the ground and outside of the noise compatibility contours of the airport. The implementation of the project would not cause airport-related hazards or excessive noise to people on the project site. No impact would occur.

French Valley Airport is in Riverside County. Another example of cutting a pasting information.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact

The water quality control plan in effect for the project region is that issued by the San Diego Regional Water Quality Control Board in 2021. The District would comply with the water quality control plan through use of storm drain catch basins with insert filters. The project site is not over a groundwater basin and thus no sustainable groundwater management plan is in effect for the project site and surrounding area. No adverse impact would occur.

The project is not under the water quality control plan of the San Diego Regional Water Quality Control Board.

NOISE

4.13.3 Existing Noise

The City of Laguna Beach General Plan Noise Element lists "noise sensitive receptors,"[21] which include, but are not limited to, areas containing schools, hospitals, rest homes, long-term medical or mental care facilities, or any other land use deemed noise sensitive by the local jurisdiction (City of Laguna Beach, 2005b). Additionally, the City's municipal code has applicable noise standards in regard to construction noise (City of Laguna Beach Municipal Code, 2005). The closest sensitive receptors to the project site include the single-family neighborhoods directly north, east, and northeast of the project site; The Church of Jesus Christ of Latter-day Saints west of the project site; and Manzanita Cottages Hotel west of the project site (Google Earth Pro, 2021). Laguna Beach High School is also considered an offsite sensitive receiver, so construction noise exposure levels at the nearest building, a library, were also taken into account. Sensitive receptors are shown in **Figure 4.13-1**. **Table 4.13-1** summarizes information about representative sensitive receivers.

It is unrealistic to not include several more locations that are in direct line of sound under "Sensitive Noise Receivers". This list must be expanded to get an actual accurate measurement of sound in affected areas.

Table 4.13-1
SENSITIVE NOISE RECEIVERS IN PROJECT AREA

Description	Location	Distance From Site Boundary	Nearest Ambient Sampling Point[b]
The Church of Jesus Christ of Latter-day Saints	682 Park Avenue	16 feet	1
Single-family Residence	721 Manzanita Drive	56 feet	2
Single-family Residence	809 Manzanita Drive	24 feet	3
Single-family Residence	820 Park Avenue	24 feet	4
Laguna Beach High School Library	625 Park Avenue	60 feet	None

[a]These are not necessarily the distances used in the construction noise calculations. See Section 4.13.6.
[b]See Figure 4.13-2 for locations of ambient noise sampling points.

On November 6 and 15, 2024, UltraSystems obtained 15-minute ambient noise level samples at four offsite locations in the general area of the project. Sampling locations are shown in **Figure 4.13-2** (see **Appendix G**). At the request of LBHS staff, the offsite sampling was coordinated with sampling in the immediate vicinity of the pool during active use of the facility.

The "noise sampling" taken on the two separate days are vastly incomplete. They were taken during swim times only and apparently with mostly lap swimming. NO High School water polo, NO youth programs, or actual High School swim meets or Water Polo games. This is a check the box move in order to skew the results to lower sound readings. Not a complete examination of one of the most critical mitigations for this entire project.

The "samplings" were taken from some very non-direct locations. One on the opposite side of elevated homes some 30' below the foundation level of the houses. Others a distance again much lower than the pool and not in line of sound. Again this appears to be a suspect action to not obtain true, pertinent and accurate results.

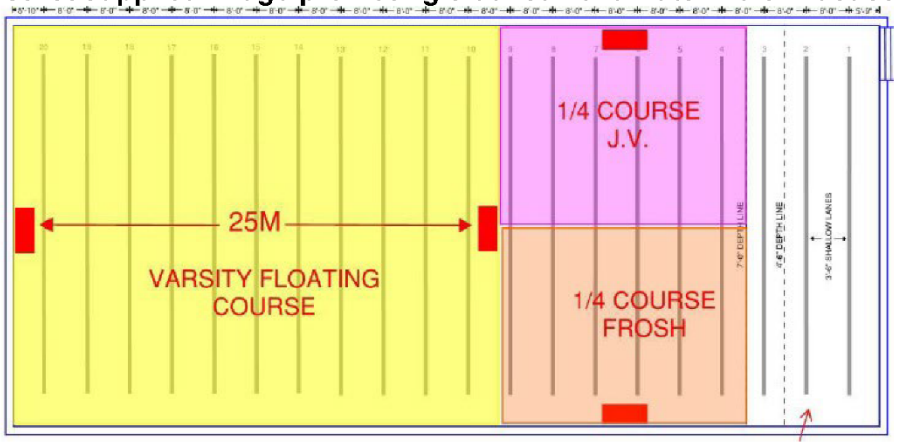
Operational Noise
Onsite
Onsite noise sources from the proposed pool renovation project would include operation of mechanical equipment such as air conditioners, lawnmowers, leaf blowers, and building maintenance equipment; and motor vehicles accessing, driving on, and exiting the parking lot. Noise levels associated with operation of the project are expected to be comparable to those of nearby residential areas. Since this is a pool replacement project, frequency of use, number of attendees, and additional sounds associated with water recreation are not expected to change. Therefore, noise from onsite sources would be less than significant.

First off, leaf blowers are illegal in Laguna Beach.

Secondly, the above statement is false and an attempt to alter the impact of this pool expansion.
As stated, the sound readings were not complete and did not measure the complete use of the current pool.

Nowhere in this document is Water Polo mentioned. That is the single most promoted reason for the expansion of this pool in countless meetings and documents. The need for a three team practice was shown below, which will bring two additional teams to the pool at the same time.

District supplied image promoting 3 concurrent Water Polo Practices



In fact, the increased number of attendees in the pool has been promoted from the start.

- ***Three concurrent Water Polo practices will be in the pool as it's been claimed only one team can practice at a time now.***
- ***Expanded use by the Cross Country Team***
- ***Expanded use by the Track Team***
- ***Expanded use by the Baseball Team***
- ***Expanded use by the Soccer Team***
- ***Expanded use by U 12 Girls Water Polo***
- ***Expanded use by U 18 Girls Water Polo***

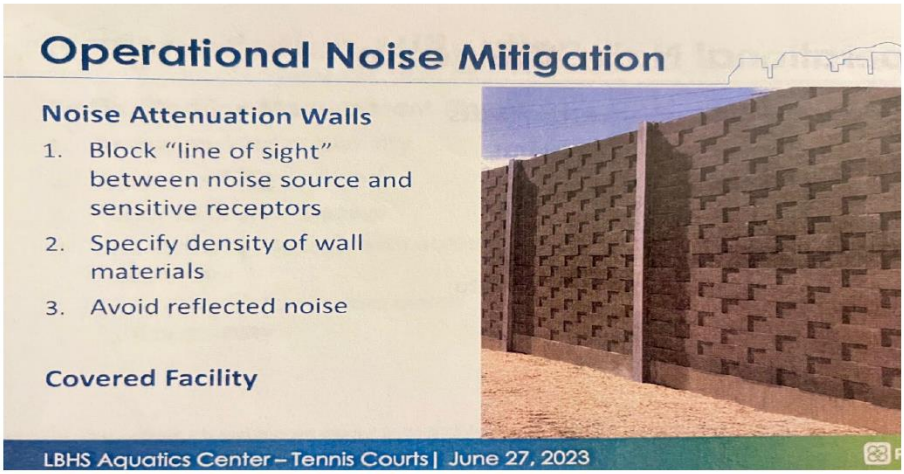
The statement that use will not increase is absolutely incorrect. Data and information from district say just the opposite.

SOUND MITIGATION

Sound mitigation has been stated and discussed many times including at the CEQA process overview. Including the following:

Unapproved Audio
Prohibit Airhorns
Boisterous activity on exit
Foot stomping on bleachers

In addition, there were examples of Noise Attenuation Walls.



None of these were discussed in the document. This is a very important mitigant that needs to be added to the plan.

TRAFFIC SAFETY

Morning and afternoon traffic around the High School is slow moving on a daily basis. Adding this construction without better planning will cause unbearable gridlock and cause safety issues. Student walking and driving safety will be challenging and dangerous.

In addition, traffic will cause a very dangerous emergency escape route problem. Park Avenue is one of the major escape routes from Top Of The World.

Mitigated Negative Declaration Document Challenges

This document is riddled with what seems to be incomplete studies and data. There are several mistakes and use of cut and paste in several areas which does not instill confidence in the validity of the content.

There are several Appendix called out but were not attached or found.

The Postcard announcing the NOTICE OF INTENT TO ADOPT, was postmarked on 1/21/25. On that card it states that 1/17/25 is the start of the time to respond. Mailing the card out 4 days after the start is not good. Again, another question of the authenticity of the process.

I believe that with the lack information, the mistakes, missing details and the poor timing of the notification card, this process needs a correction and a restart.

Please feel free to contact me with any questions.

Steve McIntosh
stevemcintosh@cox.net

ATTACHMENT F: COMMENT LETTER K

From: **Ann Gamerl** <agamerl@yahoo.com>
Date: Fri, Feb 14, 2025 at 9:38 AM
Subject: Mitigated Negative Declaration are available for review at the District Office located at 550 Blumont Street, Laguna Beach, CA 92651
To: ewahlstromrogers@lbusd.org <ewahlstromrogers@lbusd.org>

Hi Elia,
We have many questions regarding the above subject and hope that you can help us understand some of what is in the proposed document. It appears that there are some fundamental flaws and inconsistencies that we'd like to have addressed.

For example,
The project is listed at both 625 and 670 Park Ave. The description of surrounding structures omits the residences to the north. The pool dimensions are conflicting, the reduction in parking stalls - is it 7 or 5? not to mention the egregious error of referring to the school as Centennial High School, instead of Laguna Beach High School, which suggests a lack of diligence and thoroughness of the entire study.

I would like to see these concerns addressed along with the Energy use mitigation, Water use, Noise pollution and parking.

Thank you
Ann Gamerl

ATTACHMENT F: COMMENT LETTER L

From: **Patricia Halman-Menne** <patmenne@gmail.com>
Date: Fri, Feb 14, 2025 at 12:58 AM
Subject: LBHS Pool Modernization Project - Mitigated Negative Declaration
To: ewahlstromrogers@lbusd.org <ewahlstromrogers@lbusd.org>

I strongly OBJECT to the proposed LBUS Modernization Project :
1. Too Aggressive of a plan - This program is far too dense for the existing site in question.
2. Increased Noise Impacts will be a negative influence for the immediate surrounding residential neighborhood, including the adjacent hilly neighborhood 1/8 -1/4 mile away as the noise will be amplified up the hill.
3. Loss of Real Estate Asset Values (approx. millions of dollars) to all the residential properties within the immediate Park Ave location and surrounding 1000 foot radius of properties. Due to increased Noise, traffic and congestion impacts.
4. Declining student population - does not warrant this increased size of the pool area - especially for the less than 100 students that are in the aquatics programs.

Patricia Halman-Menne
Laguna Beach Resident and Property Owner
949-246-6182