LOS ANGELES SOUTHWEST COLLEGE MASTER PLAN

FINAL ENVIRONMENTAL IMPACT REPORT

PREPARED FOR

LOS ANGELES COMMUNITY COLLEGE DISTRICT

PREPARED BY

TERRY A. HAYES ASSOCIATES LLC

OCTOBER 2003

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MASTER PLAN
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RESPONSE TO COMMENTS

STATE CLEARINGHOUSE NO. 2003031024

Prepared for

THE LOS ANGELES COMMUNITY COLLEGE DISTRICT
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OVERVIEW

This Final Environmental Impact Report (Final EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA), including Sections 15088, 15089, and 15132 of the State CEQA Guidelines.

As defined by Section 15132 of the State CEQA Guidelines: "The Final EIR shall consist of: (a) the Draft EIR or a revision of the draft; (b) comments and recommendations received on the Draft EIR, either verbatim or in summary; c) a list of persons, organizations, and public agencies commenting on the Draft EIR; (d) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; [and] any other information added by the lead agency."

The environmental review phase of a project precedes the consideration of project approval. The environmental review phase identifies the environmental impacts in compliance with CEQA, while the project approval phase considers the range of factors (environmental, economic, social, etc.) relevant to the decision to approve a project. Certification of the EIR does not constitute project approval, it simply marks the end of the environmental review phase. It signifies the judgement of the lead agency that the EIR is legally adequate under CEQA and the contents of the EIR reflect the agency's independent judgment of the scope of environmental impacts.

Subsequent to certification of an EIR the Lead Agency can then proceed to consider the project for approval. Section 15093 of the CEQA Guidelines States:

(a) CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, social, technological, or other benefits of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

(b) When the Lead Agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.

c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the notice of determination. This statement does not substitute for, and shall be in addition to, findings required pursuant to Section 15091 [of the CEQA Guidelines].

PUBLIC REVIEW OF THE DRAFT EIR

The Draft EIR for the Los Angeles Southwest College Master Plan along with a request for public comments was circulated beginning August 8, 2003. The 45-day circulation period formally closed on September 22, 2003. The Draft EIR was available for public review at the Los Angeles Southwest College (LASC) campus library, the Woodcrest Library located at 1340 W. 106th Street in Los Angeles and the Crenshaw-Imperial Branch Library at 11141 Crenshaw Boulevard in Inglewood. A total of three comment letters was received in response to the Draft EIR.

This Final EIR provides responses to all written comments received on the Draft EIR, as required by Section 15088 of the CEQA Guidelines, and has been prepared in accordance with Section 15132 of the Guidelines. Responses to Comments on the Draft EIR include issues raised by public comments that warranted

clarification or correction of certain statements in the Draft EIR. This section provides any such corrections or clarifications. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the CEQA Guidelines. All written comments are contained in this section in their entirety along with the Lead Agency's responses. Copies of each comment letter are also provided.

Comment letters and responses to the Draft EIR are presented as follows:

TABLE 8.0-1: COMMENT LETTERS RECEIVED

	Name	Address	Date
1	Mona Field, President LACCD Board of Trustees	Los Angeles Community College District 770 Wilshire Boulevard Los Angeles, CA 90017	September 9, 2003
2	Louis Ford Resident of Southwest Community	Received comment via E-mail	August 14, 2003
3	Stephen Buswell, Branch Chief	California Department of Transportation (CALTRANS) District & Regional Planning 120 S. Spring Street Los Angeles, CA 90012	September 9, 2003

COMMENT LETTER NO. 1

MONA FIELD, PRESIDENT
LOS ANGELES COMMUNITY COLLEGE DISTRICT BOARD OF TRUSTEES

Comment No. 1.1

Identify any existing hazardous conditions or materials on the project sites that could be affected by construction activities. Also, review potential impacts of the use of standard paints, solvents and building materials during construction.

Mitigation measures should include safe clean-up procedures and the use of non-toxic paints and materials in all rehabilitation and new construction activities.

Response No. 1.1

A Phase I Environmental Assessment Report prepared by NATEC International, Inc. on April 17, 2003. The findings of this assessment are summarized in Chapter 4.4, Hazards and Hazardous Materials. No significant impact related to subsidence, methane gas, or soil and/or groundwater contamination, or the release of hazardous materials was found. A potentially significant impact would occur related to the removal of asbestos material, lead-based paint, and poly-chlorinated biphenyl (used in electrical transformers and lighting ballasts); however, these impacts would be reduced to less-than-significant levels with proper implementation of the mitigation measures provided in the Draft EIR.

To address the use of non-toxic paints and materials in all new construction, the following mitigation measure shall be added to the Draft EIR, Section 4.4, Hazards and Hazardous Materials, on page 4.4-5:

HHM5 Wherever feasible, building materials, compounds, paints, etc., with no or low VOC content, low toxicity, and recycled content shall be utilized on all new building construction and rehabilitation.

The addition of this mitigation measure will also be reflected in Chapter 2.0, Summary, **Table 2-1** of the Draft EIR.

Comment No. 1.2

Identify the impacts of the project on vehicular traffic, pedestrian and bicycle access, and on public transit service.

Mitigation measures should include a reference to promoting the use of public transportation to access the campus and the need to coordinate public transit agencies to optimize strategies. Vehicle ingress and egress to parking areas on campus should be located so as to minimize the impact on nearby residential neighborhoods. All parking facilities and roadways should be designed to optimize pedestrian and bicycling opportunities and pedestrian and bicycle safety.

Response No. 1.2

Impacts on vehicular traffic at the campus access driveways and the area intersections are presented in Chapter 4.8, Transportation and Traffic of the Draft EIR document. Access drives to the campus, campus roadways and parking facilities will be designed to optimize conditions for pedestrian and bicycle movement and minimize the impacts of the automobile on the campus.

As documented in the Draft EIR traffic section " Existing Transit Operations," the campus is highly served by pubic transportation. Existing transit stops are located at 1) Western Avenue near the center of the western campus boundary, 2) the intersection of Western Avenue and Imperial Highway, and 3) Imperial Highway near Denker Avenue. Existing pedestrian circulation allows for easy access to the Western Avenue and the Imperial Highway/Denker Avenue transit stops. There are no convenient pedestrian paths to the transit stops at the Western Avenue/Imperial Highway corner. Proposed pedestrian circulation will allow for improved connection to the transit stops at the corner of Imperial Highway and Western Avenue by providing additional paths of travel to the campus boundaries near this location. Thus, the proposed on-campus circulation system would not adversely affect bus operations, but would improve access to transit stops. Further, all pedestrian pathways are designed to avoid conflicts with vehicular traffic.

It should also be noted that the most recent surveys of the LASC faculty and staff indicate that about two percent use public transportation to access the campus. That percentage should remain about the same after the proposed campus growth. Based on that ridership percentage, the existing area transit system should be more than adequate to accommodate the projected increase. There was no available current data on the percentage of students using transit, however, field observations indicated that there was a constant use of the transit stops adjacent to the campus. Based on field observations, there should be adequate capacity in the current transit system to accommodate the anticipated increase in students. The College will continue to work with appropriate agencies to encourage and promote the use of public transit, walking, and bicycling as alternative modes of travel to and from the campus for faculty and staff. Reasonable efforts will continue to be made to work with and coordinate transit service with the MTA.

Currently, the campus has three vehicle access points (two on Imperial Highway and one on Western Avenue). Vehicular access would be improved to allow easy access to new and improved parking facilities with an additional access point for restricted vehicle access. An improved drop-off point shall be provided along Imperial Highway.

While the mitigation measures proposed in the traffic study are designed to maintain traffic conditions for automobile use in the area, the maintenance of acceptable levels of service on the area streets will indirectly

accommodate transit riders, pedestrians and bicyclists. Maintaining adequate levels of service on the streets will contribute to maintaining transit schedules by providing capacity for buses, and will pedestrians and bicyclists to cross the street without inducing unacceptable traffic congestion.

Comment No. 1.3

The study should review the impact of the proposed project on water usage.

Mitigation measures should include use of tree planting, landscaping, permeable paved surfaces and other drainage management techniques that retain water onsite to reduce runoff and the need for irrigation. Irrigation options should include drip irrigation and other water conservation strategies. Water saving toilets, faucets, and other water conveyance devices should be used wherever possible.

Response No. 1.3

The Draft EIR includes numerous mitigation measures to address water consumption reduction and water conservation. The use of native, water-efficient plants in landscaping, water-efficient irrigation systems, low flow toilets and the implementation of a water reclamation system are water conservation techniques included as mitigation measures in Section 4.9, Utilities and Service Systems in the Draft EIR. To address storm water runoff, mitigation measure **USS5** shall be revised as follows:

USS5 In an effort to comply with the Los Angeles Regional Water quality Control Board March 2000 Resolution, LASC shall prepare a Standard Urban Storm Water Mitigation Plan (SUSMP). Further, where feasible, LASC shall facilitate the construction of a water reclamation system to supplement its water supply for reuse for campus landscaping. ~~LASC shall facilitate the construction of a water reclamation system to supplement its water supply.~~

The addition of this mitigation measure will also be reflected in Chapter 2.0, Summary, **Table 2-1** of the Draft EIR.

Comment No. 1.4

Review the impact of the project on electric, wastewater, and solid waste systems.

Mitigation measures should include the implementation of energy conservation and renewable generation techniques based on applicable LEED standards to reduce energy costs. The District has specified LEEDs certification as a minimum requirement for qualified buildings, with maximized use of sustainability strategies on other buildings and all rehabilitation projects. Additionally, consideration should be given to the strategic planting of trees to provide shading that will reduce air conditioning needs. This should include planting trees and landscaping in and adjacent to parking lots to reduce the "heat island" effect.

Stress on wastewater systems should be reduced by employing water saving toilets. The solid waste stream should be reduced by using recycled building materials wherever possible, by recycling construction waste, by specifying use of recycled content products in ongoing campus operations and by expanding on-campus recycling programs in general.

Response No. 1.4

In Section 4.9 Utilities and Service Systems of the Draft EIR, a brief description of the Leadership in Energy and Environmental Design (LEED) Rating System is provided to introduce readers unfamiliar with the system to its goals and methodology. As the Los Angeles Community College District (LACCD) has mandated a

LEED Rating System for all new buildings that will be a part of the Proposition A and AA bond programs, the Draft EIR accordingly adopts energy and water saving methods accepted and promoted by the LEED system as mitigation measures. Mitigation measures under the "Water Supply" section of the Draft EIR address water conservation methods to be employed on the campus. The use of light-colored roofs for heat reflection, operable windows and an increased amount of natural light through optimal building orientation are part of energy conservation mitigation measures provided in the Draft EIR. Furthermore, the following mitigation measure shall be added to Section 4.9, Utilities and Service Systems, on page 4.9-8 of the Draft EIR:

USS10 The strategic planting of trees and landscaping to provide shade near buildings and adjacent parking lots shall be utilized to reduce air conditioning demands and the "heat island" effect.

In regards to solid waste, it is anticipated that construction companies would be required to recycle any marketable building materials. To ensure that this step takes place, the following mitigation measure shall be added to Section 4.9, Utilities and Service Systems, on page 4.9-8 of the Draft EIR:

USS11 In conjunction with the existing solid waste recycling program, LASC shall require all contractors to utilize a construction waste recycling plan to be provided by the college.

The addition of mitigation measures **USS10** and **USS11** will also be reflected in Section 2.0, Summary, **Table 2-1** of the Draft EIR.

Comment No. 1.5

A thorough review of the cumulative impacts of the project on the existing campus and surrounding community should be included.

Response No. 1.5

As required by CEQA, an analysis of cumulative effects is included. The cumulative effect discussion is found at the conclusion of each environmental impact section in the Draft EIR.

Comment No. 1.6

Review the impact of project construction and operation of finished facilities on air quality.

Response No. 1.6

A thorough evaluation of both construction and operational air quality impacts has been included in the Draft EIR, Section 4.2, Air Quality. The report concluded that no significant impacts related to construction emissions, operational CO concentration, or consistency with the Air Quality Management Plan would occur. However, a significant operational impact would occur related to NO_x emissions. Increased motor vehicle trips to and from campus would result in a significant, unavoidable NO_x emissions impact during the operations phase of the project. A significant cumulative impact would also result as cumulative NO_x emissions are anticipated to exceed the SCAQMD threshold.

Comment No. 1.7

Review the impact of the project on existing natural and incidental habitat areas.

Mitigation measures should include a policy of no net loss of habitat on campus, and the increase of habitat wherever possible through the use of appropriate natural vegetation as part of project design and landscaping plans.

Response No. 1.7

This discussion was not a part of the Draft EIR as the project site is located within an area that has been urbanized for many years. As discussed in the West Athens/Westmont Community Plan (of which the campus is a part) no rare or endangered plant or animal species are known or suspected to exist within the Community Plan boundaries. However, native plants shall be used in landscaping whenever feasible as discussed in Section 4.9, Utilities and Service Systems of the Draft EIR.

Comment No. 1.8

Review project alternatives that include, at a minimum, a slightly reduced number of new buildings (due to possible cost constraints) and a no project alternative.

Response No. 1.8

As required under CEQA Guidelines 15126.6(e) the Draft EIR evaluates a "no project" alternative in section 5.0 Alternatives. A reduced level of construction was not evaluated.

CEQA requires consideration of alternatives when the proposed project would result in significant physical impacts to the environment. CEQA does not specifically require the consideration of alternatives that are designed solely to reduce an anticipated fiscal or cost impact on the implementing agency. LASC has the smallest existing student enrollment of any of the nine District campuses, and the projected enrollment at LASC would still leave the campus the smallest in the District.

As proposed, the LASC Master Plan includes facilities that fall into several basic categories, administrative space, community serving facilities, parking/roads, open space/landscaping and recreational/athletic facilities. The primary generator of environmental impacts, are classroom and lab facilities. In this context, a reduced density alternative would likely have minimal effect on reducing potential environmental impacts that are primarily related to program offerings and student enrollment as new educational facilities will replace existing educational facilities that are proposed to be demolished (bungalows).

The most logical reduced density concept for the LASC campus would entail implementation of only the Phase I projects totally about 99,767 net new square feet compared to the total Master Plan build out of 273,067 net new square feet.

The following text shall be added to Chapter 5.0, Project Alternatives, subsection 5.2 Analysis of Alternatives:

Alternative 3-Reduced Density Alternative

The "Reduced Density" alternative assumes that the proposed project would encompass only the near-term portion of the Master Plan. The near-term projects include the construction of the Child Development Center/Classroom Building, Student Services/Activity Cluster Center Building, Maintenance Operations Building, expansion of the stadium to seat 4,000 spectators, and Stadium Field House. Also, as part of the near term is the conversion of the Student Services Center to Classrooms and Labs, and the Modernization of several buildings (Cox Administration, Theater, Technology Education Building, Thomas G. Larkin Physical Education and Lecture Laboratory Buildings). In addition, the two new parking structures were

considered for this alternative. Implementation of this alternative would result in 99,767 net new square feet of building space.

Summary of Impacts

The "Reduced Density" Alternative would mean that only near-term projects would be implemented. Although, the amount of square footage is significantly less than the proposed Master Plan Project, environmental impacts would be relatively the same. This is due to the fact that facilities proposed in the Long-term phase are primarily administrative facilities. Classroom facilities proposed would replace facilities set for demolition (bungalows). Thus, even with a reduced density alternative an increase in student population is still anticipated.

The environmental effects of the "Reduced Density" Alternative would include the following:

- **Aesthetics and Lighting.** Improvement to campus perimeter landscaping and screening would still occur along with improvements/modernization to existing buildings.

- Air Quality. For operational impacts, the "Reduced Density" Alternative would result in air quality impacts similar to that of the proposed project due to the fact that air quality impacts are related to the number of trips to and from the campus not campus density. For construction related air quality impacts, no significant impacts are anticipated as was disclosed for full project buildout.

- **Geology and Seismicity.** No impact. As with full build-out, the siting of buildings must conform with seismic constraint guidelines (see 4.3 Geology and Seismicity for seismic discussion).

- **Hazards and Hazardous Materials.** No impact.

- **Land Use and Planning.** No impact. The primary issue under this category is zoning compliance. This would continue to be an issue under this alternative and would require mitigation.

- **Noise.** The primary issue related to noise deals with operational noise (special events in the expanded stadium). This would continue to be an issue.

- **Public Services.**

  - Police. As with full build-out, the demand for Sheriff services would be incremental and the need for additional staff would be determined on an "as needed" basis.
  - Fire. The demand for Fire services would be incremental on the LASC campus.

- **Transportation and Traffic.** Transportation related impacts wold be similar to the proposed project impacts due to the fact that traffic impacts are connected to increased enrollment.

- **Utilities and Service Systems.** It is not expected that a significant increased or decreased demand for utilities and infrastructure would occur under this alternative as demand is based on increased population not density.

Add the following text after paragraph three to subsection 5.3, Environmentally Superior Alternative in Chapter 5.0, Project Alternatives:

The "Reduced Density" Alternative would not meet the objectives of the Master Plan as it would not allow the campus to meet its need for administrative space. In addition, the environmental impacts resulting from this alternative would be virtually the same as that of the Proposed Project.

COMMENT LETTER NO. 2

RESIDENT OF THE SOUTHWEST COMMUNITY

Comment No. 2.1

Please consider 110th Street between Normandie and Denker streets as known disruptive speed zone thru our community. It has been used as an alternate route to Southwest College. We ask that this street be considered for Speed-Bump placement. This would improve current and future traffic control thru out the entire area.

Response No. 2.1

The college recognizes that in some instances LASC students may use local neighborhood streets to avoid major intersections and access the main campus driveway at Denker Avenue. The college also recognizes that there may be a cumulative effect of college cut through traffic and cut through traffic related to Washington Preparatory High School located several blocks to the north of the college on Denker Avenue. The installation of speed humps, however, falls solely within the jurisdiction of the Los Angeles County Department of Public Works (LADPW). LADPW has a Neighborhood Traffic Management Program (NTMP) with an established process for initiating a study for the installation of such devices. This process requires substantial community input and agreement on the problem to be addressed and coordination with the various affected public agencies. Information about the County's NTMP and forms for initiating an neighborhood action request can be found on the LADPW web site at http://ladpw.org/Traffic/NTMP/.

LASC shall coordinate with the LADPW regarding any traffic calming plan for the area north of the campus. Should a plan be developed involving the residents, the college and Washington High School, the college shall cooperate with the County to provide appropriate assistance for the installation of a speed hump or other appropriate devices, as well as initiate an on-campus information and education program to discourage students from using neighborhood streets to access the campus.

COMMENT LETTER NO. 3

CALIFORNIA DEPARTMENT OF TRANSPORTATION

Comment No. 3.1

The proposed traffic mitigation measures for State transportation facilities appears to be acceptable. However, the proposed mitigation measures TT13 should also include an equitable share of cost for improvements to the I-105 Freeway eastbound off-ramp to 120th Street.

Response No. 3.1

LASC will prepare a preliminary cost estimate for the proposed mitigation measure and a proposed cost share. The mitigation measure and cost share proposal will be discussed with Caltrans.

Comment No. 3.2

Proposed development may need to conform with the National Pollution Discharge Elimination System (NPDES) requirements relating to construction activities and post-construction Storm Water Management. To the maximum extent practicable, Best Management Practices will need to be implemented to address storm water runoff from new development. The responsible water quality control agencies will need to review storm water runoff facilities and drainage plans.

Response No. 3.2

See Response No. 1.3 for the revised mitigation measure addressing storm water runoff.

Comment No. 3.3

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit.

Response No. 3.3

Comment noted. The construction specifications and contract documents prepared for the LASC Master Plan shall specify that all contracts obtain appropriate Caltrans permits.

Comment No. 3.4

Any work to be performed within the State right-of-way will need a Caltrans Encroachment Permit.

Response No. 3.4

It is not expected that LASC facilities will be constructed adjacent to a State right-of-way. In the event that this becomes the case, then the construction specifications and contract documents for the LASC Master Plan shall indicate that contractors shall obtain the appropriate encroachment permit.

Comment No. 3.5

If freeway noise is expected to affect new facilities, noise attenuation measures such as site replacement, soundwalls, or architectural design elements may be needed.

Response No. 3.5

In the vicinity of LASC the I-105 freeway is depressed. The freeway is separated from the main campus by a substantial landscaped slope which absorbs sound propagation from the freeway. Existing noise sensitive uses on the LASC campus (classrooms) are not located adjacent to the I-105 freeway. Proposed new facilities on campus shall also be located in the central and northern portion of the campus and would not be affected by freeway noise. Thus, it is not expected that additional noise barriers would be needed.