

Appendices

Appendix B Comments to Notice of Preparation

Appendices

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning
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*Making Conservation
a California Way of Life.*

August 27, 2019

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

RE: Wedgeworth K-8 School and Residential
Development – Notice of Preparation (NOP)
and Initial Study
GTS # 07-LA-2019-02720
SCH # 2019071040
Vic. LA-60/PM: 17.673

Dear Mr. Mark Hansberger:

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

The nearest State facilities to the proposed project are State Route 60 (SR-60) and SR-39 (also known as South Azusa Avenue). In the transportation section of the project's Initial Study, it states that the project would have a potentially significant impact in terms of:

- a. Conflicting with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- b. Conflicting or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b); and
- c. Substantially increasing hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)

The initial study also states that the project will potentially have a less than significant impact in terms of resulting in inadequate emergency access.

These potential impacts will be further discussed in the upcoming Draft Environmental Impact Report (DEIR). Caltrans looks forward to receiving the DEIR for review and to provide further comments, if warranted. From reviewing the initial study, the following intersections that are on the State highway may need to be included in the forthcoming transportation impact study (TIS), which will be included in the DEIR:

- a. SR-60 on-ramps and South Azusa Avenue
- b. SR-60 off-ramps and South Azusa Avenue
- c. Colima Road and South Azusa Avenue
- d. Gale Avenue and South Azusa Avenue

The locations to be studied should not be limited to the above intersections. The above intersections may need to be studied in the TIS due to their close proximity to the project site.

Caltrans also recommends that the Highway Capacity Manual (HCM) Sixth Edition method be used for conducting operational and conflict analyses on State highway facilities. When the State highway facility has saturated flows, it is encouraged that a micro-simulation model be used for the analyses.

In addition, if construction traffic is expected to cause delays on any State facilities, please submit a construction traffic management plan detailing these delays for Caltrans' review. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Therefore, Caltrans encourages the Lead Agency to integrate transportation and land use in a way that reduces Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions, as well as facilitates a high level of non-motorized travel and transit use. We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications to meet these goals. Potential strategies for this project include:

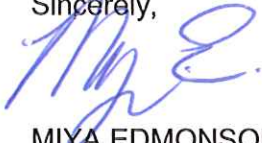
- Maintaining pedestrian accessibility points to/from the school, to/from the potential new housing development, and between the school and housing development
- Installing high-visibility crosswalks with Continental or Ladder designs
- Providing bicycle, scooter, and skate board parking
- Constructing wide sidewalks with Americans with Disabilities Act (ADA) compliant ramps that are not obstructed by utility poles
- Implementing traffic calming measures in the surrounding neighborhood, such as reduced speeds, bulb-outs, speed humps/tables, mini-roundabouts, and traffic diverters
- Planting shade trees and bioswales to increase livability and reduce storm-water runoff, which is a sensitive issue for Los Angeles county that needs to be considered during project design
- Using permeable paving materials to also reduce storm-water runoff
- Launching Safe Routes to School educational and marketing campaigns that promote the use of active transportation modes such as bicycling and walking

For additional TDM options, please refer to *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA). The reference is available online at: <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

Mr. Mark Hansberger
August 27, 2019
Page 3 of 3

If you have any questions regarding these comments, please contact project coordinator Emily Gibson, at Emily.Gibson@dot.ca.gov and refer to GTS# 07-LA-2019-02720.

Sincerely,



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



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

"Parks Make Life Better!"

John Wicker, Director

Norma E. Garcia, Chief Deputy Director

August 26, 2019

Sent via email: mhansberger@hlpusd.k12.ca.us

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

Dear Mr. Hansberger:

**NOTICE OF PREPARATION OF DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)
FOR THE WEDGEWORTH K-8 SCHOOL
AND RESIDENTIAL DEVELOPMENT PROJECT**

The subject project has been reviewed by the Department of Parks and Recreation (DPR). There are four DPR facilities located within a mile radius of the proposed project site:

- Pepperbrook Park: 1701 South Countrywood Ave., Hacienda Heights, CA 91745
- Thomas S. Burton Park: 16493 East Santa Bianca Dr., Hacienda Heights, CA 91745
- Countrywood Park: 16817 East Cooper Hill Rd., Hacienda Heights, CA 91745
- Peter F. Schabarum Regional County Park: 17250 East Colima Rd., Rowland Heights, CA 91748

Please provide an analysis on the project's potential impacts to the above-mentioned County parks in the EIR. Specifically, please provide information on whether the proposed school has any plans to utilize these County parks for physical education or sports programming.

The Los Angeles County Code requires the subdivider of a residential subdivision to provide local park space to serve the subdivision, pay a fee in-lieu of the provision of such park land in accordance with the provisions of County Code Section 21.28.140 (Quimby Code), provide local park space containing less than the required obligation but developed with amenities equal in value to the park fee, or do a combination of the above. Because the project is a residential subdivision, the applicant would be required to adhere to this provision.

Per the County's Quimby Code, the acreage of parkland obligation is based upon the residential density of a project. This calculation is determined using the following formula:

$$X = 0.003(U \times P)$$

The total approved number of dwelling units (U) is multiplied by the average household size by dwelling unit type (P) in each Park Planning Area (PPA). (The proposed project is located in PPA 9 – Hacienda Heights.) This is then multiplied by 0.003 which represents the ratio of 3 acres of parkland per 1,000 residents. The average household size figures are updated annually using the latest available data from the U.S. Census Bureau.

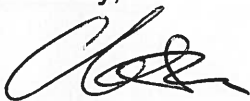
The in-lieu fee amount is calculated using the acreage of parkland obligation multiplied by the representative land value (RLV) for the PPA. RLVs are adjusted annually based on changes in the Consumer Price Index (CPI) as published by the U.S. Bureau of Labor Statistics.

As shown in the calculations below, the proposed project has a Quimby parkland obligations of 1.63 acres or in-lieu fee of \$443,314:

Dwelling Unit Type	3 acres per 1,000 People	Proposed # of Units	AHS	Acre Obligation	In-Lieu Fee Amount
2019-20 Detached SF Units AHS	0.003	0	3.45	0.00	\$0
2019-20 MF <5 Units AHS	0.003	130	3.61	1.41	\$380,714
2019-20 MF >=5 Units AHS	0.003	30	2.49	0.22	\$60,600
2019-20 Mobile Units AHS	0.003	0	3.17	0.00	\$0
2019-20 RLV	270,413.00	160		1.63 Acres	\$441,314

Thank you for including this Department in the review of this document. If you have any questions, please contact Ms. Julie Yom of my staff at jyom@parks.lacounty.gov or (626) 588-5311.

Sincerely,



Clement Lau, AICP
Departmental Facilities Planner II
Planning & CEQA Section

JY:CL/NOP for the Wedgeworth School and Residential Development

c: Parks and Recreation (L. Quach, J. Yom)



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director

August 26, 2019

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

[Via email: mhansberger@hlpusd.k12.ca.us]

Dear Mr. Hansberger:

RE: WEDGEWORTH K-8 SCHOOL AND RESIDENTIAL DEVELOPMENT PROJECT

The Department of Regional Planning (Department) appreciates the opportunity to comment on the scope and content of the Notice of Preparation and Initial Study. We have a number of comments and concerns that we would like to see the following concerns appropriately addressed.

As the project description includes sale of "the remaining 10 acres to residential developers," the project is considered a proposed subdivision within the jurisdiction of the County of Los Angeles pursuant to Government Code Section 66424 and this proposed division of land is subject to the Subdivision Map Act and the County's subdivision ordinance.

Greenhouse Gas Emissions (GHG):

The County adopted a Community Climate Action Plan (CCAP) to reduce GHG as part of its Air Quality Element in the General Plan in 2015 and will be adopting an updated Climate Action Plan in 2020. We recommend that all applicable measures be included in the project, including incorporating solar and other renewable energy (including homes with solar and EV), incorporating ride-sharing programs, implementing idling requirements during construction, and using sustainable pavements ([County Community Climate Action Plan](#)).

Land Use and Planning:

- The Hacienda Heights Community Plan, adopted in May, 2011, designated this property as H5 (Residential 5) land use category, which would permit a maximum range of up to 5 dwelling units per acre. Currently, with 10 acres, the maximum permitted density would be 50 residential units. The project proposes "up to 160 dwelling units", which is significantly higher than what was planned for on this property.

The property also has a R-A (Residential-Agriculture) zoning designation which would further require a minimum of 5,000 sq. ft. of area for each residential unit.

- The proposed project will be subject to the currently proposed draft Inclusionary Housing Ordinance and shall fulfill the requirements in place at the time as applicable.
- On August 6, 2019, the Board of Supervisors adopted the OurCounty Sustainability Plan. Action 1 is to "Limit siting of new sensitive uses such as playgrounds, daycare centers, schools, residences, or medical facilities at least 500 feet from freeways." https://ourcountyla.org/plan/actions?_sft_entity=department-of-regional-planning

This is consistent with the County's Department of Public Health and the California Air Resources Board policy regarding the impact of freeway air pollutants on human health.

Tribal Cultural Resources:

This property is within the ancestral area of the Kizh Nation (Gabrieleno Band of Mission Indians) and they must be consulted in the course of any County subdivision process.

If you have any questions regarding these comments, please contact me at (213) 974-6461 or phachiya@planning.lacounty.gov.

Sincerely,

Patricia L. Hachiya
For

Patricia L. Hachiya, AICP
Supervising Regional Planner
Environmental Planning and Sustainability

C: Joshua Huntington, AICP, Supervising Regional Planner, Land Divisions
Steven Jones, AICP, Principal Planner, Land Divisions

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>



August 9, 2019

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

RE: SCH# 2019071040, Wedgeworth K-8 School and Residential Development Project, Los Angeles County

Dear Mr. Hansberger:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Service Analyst

cc: State Clearinghouse



BARBARA FERRER, Ph.D., M.P.H., M.Ed.
Director

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August 27, 2019

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

NOTICE OF PREPARATION & INITIAL STUDY FOR WEDGEWORTH SCHOOL & RESIDENTIAL DEVELOPMENT LOCATED AT 16949 WEDGEWORTH DRIVE, HACIENDA HEIGHTS

Dear Mr. Hansberger:

The Los Angeles County Department of Public Health (DPH) reviewed the Initial Study (IS) for the Wedgeworth School & Residential Development Project. DPH concurs with the findings of the IS and an Environmental Impact Report (EIR) should be required to further evaluate potential health impacts. The following are our comments concerning Noise, Air Quality/HRA, and other public health concerns:

NOISE:

- The project shall adhere to the requirements contained in Title 12 Chapter 12.08 of the Los Angeles County Noise Control Ordinance.
- The IS noted that the noise impacts associated with the project on surrounding properties will be further evaluated in the EIR. Although evaluating the noise impacts from surrounding properties or land-use affecting the project is a

non-scope item per CEQA, the potential noise impact from vehicular traffic due to the California 60 freeway and other sources maybe significant and should be further evaluated. In addition, the noise from the proposed school operations may affect the new residential development. The construction of the new residential units may also impact the proposed school and should be further evaluated.

AIR QUALITY/HRA:

- The IS noted that the air quality impacts associated with the project on surrounding properties will be further evaluated in the EIR.
- The project is located near a major roadway (California 60 freeway). According to the DPH document "Air Quality Recommendations for Local Jurisdictions", a buffer of at least 500 feet should be maintained between the development of new schools, housing or other sensitive land uses and freeways. Consideration should be given to extending this minimum buffer zone based on site-specific conditions, given the fact that unhealthy traffic emissions are often present at greater distances. Exceptions to this recommended practice should be made only upon a finding by the decision-making body that the benefits of such development outweigh the public health risks.

New schools, housing or other sensitive land uses built within 1500 feet of a freeway should adhere to current best-practice mitigation measures to reduce exposure to air pollution which may include: the use of air filtration to enhance heating, ventilation and air conditioning (HVAC) systems, and the orientation of site buildings and placement of outdoor facilities designed for moderate physical activity as far from the emission source as possible. The EIR should evaluate this further. Please refer to the document included at the end of this letter.

- The HRA evaluates only adult school staff and students. The EIR should evaluate other sensitive receptors that may be potentially impacted by the project such as visitors and offsite residential receptors.
- The project is in a high pollution burdened area (88%) according CalEnviroScreen 3.0, and development of a sensitive land use in this area would contribute to cumulative exposure and localized health impacts.
- Although not regulated as particulate emissions from diesel-fueled engines, ultrafine particles are a constituent of diesel vehicle exhaust that can travel to the lungs and into the bloodstream. Idling is a concern since the proposed increase in student enrollment capacity would increase vehicle traffic during student

drop-off and pick-up periods. Consider emissions from vehicles idling and traveling to and from the school and evaluate potential impacts.

- Dust emissions during grading and or excavations may also expose workers and the public to soil fungal spores which can cause Valley Fever. Valley Fever is the common name (formally known as Coccidioidomycosis) for a fungal disease caused by inhalation of *Coccidioides immitis* spores that are carried in dust; it is found in parts of the southwestern United States, Mexico, and South America (LADPH 2016). In California, the highest incidence of Valley Fever occurs in the San Joaquin (Central) Valley, with over 75 percent of reported cases (CDPH 2014). In Los Angeles County or in Southern California, the fungus is endemic. The EIR should evaluate the impacts associated with fugitive dust emissions and include a discussion on Valley Fever. The contractors involved should be made aware of this and follow safe work practices as per Cal-OSHA. Include dust mitigation measures.
- Determine the presence of active and abandoned oil wells and oil facilities within 500 ft. of the project and evaluate potential impacts.

Thank you for the opportunity to review the IS and recommend areas for further evaluation in the EIR. If you have any questions, please contact Robert Vasquez at (213) 738-3220.

Sincerely,



Charlene Contreras, Branch Director
Environmental Preparedness & Response

CC:rv

Attachment



AIR QUALITY RECOMMENDATIONS FOR LOCAL JURISDICTIONS

Development of new schools, housing, and other sensitive land-uses in proximity to freeways

Studies indicate that residing near sources of traffic pollution is associated with adverse health effects such as exacerbation of asthma, onset of childhood asthma, non-asthma respiratory symptoms, impaired lung function, reduced lung development during childhood, and cardiovascular morbidity and mortality.ⁱ These associations are diminished with distance from the pollution source.

Given the association between traffic pollution and health, the California Air Resources Board recommends that freeways be sited at least 500 feet from residences, schools, and other sensitive land uses.ⁱⁱ Other reputable research entities such as the Health Effects Institute indicate that exposure to unhealthy traffic emissions may in fact occur up to 300 to 500 meters (approximately 984 to 1640 feet). The range reported by HEI reflects the variable influence of background pollution concentrations, meteorological conditions, and season.ⁱⁱⁱ

Based on this large body of scientific evidence, the Los Angeles County Department of Public Health strongly recommends:

- A buffer of at least 500 feet should be maintained between the development of new schools, housing or other sensitive land uses and freeways. Consideration should be given to extending this minimum buffer zone based on site-specific conditions, given the fact that unhealthy traffic emissions are often present at greater distances. Exceptions to this recommended practice should be made only upon a finding by the decision-making body that the benefits of such development outweigh the public health risks.
- New schools, housing or other sensitive land uses built within 1500 feet of a freeway should adhere to current best-practice mitigation measures to reduce exposure to air pollution which may include: the use of air filtration to enhance heating, ventilation and air conditioning (HVAC) systems, and the orientation of site buildings and placement of outdoor facilities designed for moderate physical activity as far from the emission source as possible.

Development of parks and active recreational facilities in proximity to freeways

Parks and recreational facilities provide great benefits to community residents including increased levels of physical activity, improved mental health, and opportunities to strengthen social ties with neighbors.^{iv, v, vi} However, siting parks and active recreational facilities near freeways may increase public exposure to harmful pollutants, particularly while exercising. Studies show that heavy exercise near sources of traffic pollution may have adverse health effects.^{vii, viii, ix} However, there are also substantial health benefits associated with exercise.^x Therefore, DPH recommends the following cautionary approach when siting parks and active recreational facilities near freeways:

- New parks with athletic fields, courts, and other outdoor facilities designed for moderate to vigorous physical activity, should be sited at least 500 feet from a freeway. Consideration should be given to extending this minimum buffer zone based on site-specific conditions given the fact that unhealthy traffic emissions are often present at greater distances. Exceptions to this recommended practice should be made only upon a finding by the decision-making body that the benefits of such development outweigh the public health risks.
- New parks built within 1500 feet of freeways should adhere to best-practice mitigation measures that minimize exposure to air pollution. These include the placement of athletic fields, courts, and other active outdoor facilities as far as possible from the air pollution source.

ⁱ Health Effects Institute. 2010. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. HEI Special Report. p.1-11

ⁱⁱ California Environmental Protection Agency. California Air Resources Board. Air Quality and Land Use Handbook: A Community Health Perspective. April 2005.

ⁱⁱⁱ Health Effects Institute. 2010. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. HEI Special Report. p.1-11

^{iv} L. Frank et al. 2005. Linking Objectively Measured Physical Activity with Objectively Measured Urban Form: Findings From SMARTRAQ. American Journal of Preventive Medicine, at 117-1255.

^v Tabbush R and E O'Brien. 2003. Health and Well-being: Trees, Woodlands, and Natural Spaces. Forestry Commission, Edinburgh.

^{vi} E. Kuo et al. 1998. Transforming Inner-City Neighborhoods: Trees, Sense of Safety, and Preference. Environmental Behavior. 30(1): 28-59.

^{vii} McConnell R, Berhane K, Gilliland F, London SJ, Islam T, Gauderman WJ, Avol E, Margolis HG, Peters JM. Asthma in exercising children exposed to ozone: a cohort study. Lancet. 2002 Feb 2;359(9304):386-91.

^{viii} Sharman JE, Cockcroft JR, and JS Coombes. Cardiovascular implications of exposure to traffic air pollution during exercise. Q J Med 2004; 97:637-643.

^{ix} Rundell KW, Caviston R, Hollenbach AM, and K Murphy. Vehicular Air Pollution, Playgrounds, and Youth Athletic Fields. 2006, Vol. 18, No. 8, Pages 541-547.

^x de Hartog JJ, Boogaard H, Nijland H, and G Hoek. Do the Health Benefits of Cycling Outweigh the Risks? Environmental Health Perspectives. 2010; 118(8): 1109-1116.

From: [Mark Hansberger](#)
To: [Dwayne Mears](#); [Elizabeth Kim](#)
Cc: [Helen Wise](#)
Subject: FW: Wedgeworth K-8 School and Residential Project NOP/IS
Date: Tuesday, August 27, 2019 1:45:45 PM

Good afternoon,

Please see the attached comments received earlier today.

Thank you

From: Toan Duong <TDUONG@dpw.lacounty.gov>
Sent: Tuesday, August 27, 2019 6:53 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>; Helen Wise <hwise@hlpusd.k12.ca.us>
Cc: Jose Cruz <JoCruz@dpw.lacounty.gov>; Jose Suarez <JSUAREZ@dpw.lacounty.gov>
Subject: Wedgeworth K-8 School and Residential Project NOP/IS

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

Dear Mr. Hansberger,

**WEDGEWORTH K-8 SCHOOL AND RESIDENTIAL
NOTICE OF PREPARATION (NOP) OF
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
16949 WEDGEWORTH DRIVE
ASSESSOR'S PARCEL NUMBER 8209-001-901**

Thank you for the opportunity to review the initial study for the subject project. The project is a redevelopment of Wedgeworth Elementary School which will increase the number of students from 600 to 1,200 in phase 1, and to create 160 new residential units for sale to a private developer in phase 2.

The following comments from the Los Angeles County Public Works Department (Public Works) are for your consideration:

1. Section 3.19, Utilities and Service System:

1.1. Hazardous Waste Outreach

The existing Hazardous Waste Management (HWM) infrastructure in Los Angeles County is inadequate to handle the hazardous waste currently being generated.

The proposed Phase 2 of the project may generate household hazardous waste, which could adversely impact existing HWM infrastructure. This issue should be addressed, and mitigation measures provided in the DEIR. Mitigation measures may include, but are not limited to, providing new homeowners with educational materials on the proper management and disposal of household hazardous waste.

Visit <http://dpw.lacounty.gov/epd/hhw/index.cfm> online or contact Public Works, Environmental Programs Division (EPD) at (626) 458-3562 for available educational materials.

1.2. Solid Waste

School Districts are encouraged to take advantage of special County programs to encourage waste diversion by visiting www.CleanLA.com online or calling 1(888) CLEAN LA.

Visit <http://dpw.lacounty.gov/epd/brtap/recyclingsite> online or contact EPD at (626) 458-3554 for available educational material about Business Recycling.

1.3. Storage Space for Recyclables

-

The California Solid Waste Reuse and Recycling Access Act of 1991 requires each development project to provide an adequate storage area for collection and removal of recyclable materials. The DEIR should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for this project. Contact EPD at (626) 458-2193 for more information about the required storage area for collection and removal of recyclable materials.

1.4. Building and Safety

The Los Angeles County Building Code, Section 110.4 requires that buildings or structures adjacent to or within 300 feet (60.96 m) of active, abandoned or idle oil or gas well(s) be provided with methane gas protection systems. It appears that the project site lies within 300 feet of an active, abandoned or idle oil or gas wells, this issue should be addressed, and mitigation measure provided in the DEIR. Contact EPD at (626) 458-2193 for issuance of necessary permits.

1.5. Hazardous Waste

Since the project site was part of land used for agricultural purposes prior to the construction of the existing school, if any excavated soil is contaminated by or classified as hazardous waste by an appropriate agency, the soil must be managed and disposed in accordance with applicable Federal, State, and local laws and regulations.

1.6. Stormwater

Should any operation within the subject project include the construction, installation, modification or removal of storm water treatment facilities (<http://dpw.lacounty.gov/epd/Stormwater/inspection.cfm>), contact EPD for the required operating permits. Specific industry types will also be subject to registration and inspections related to implementation of best management practices to prevent stormwater related pollution (LACC Title 12, Chapter 12.80). Contact EPD at (626) 458-3517 for more permit information.

1.7. Organic Waste Diversion

The Short-Lived Climate Pollutants bill (SB 1383, 2016), establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025.

Property owner representatives contracting with the trash hauling and landscaping services are to include in the service agreements that organic waste, including green waste, hauled from the properties, whether mixed with trash or source separated, are to be diverted from landfills, which may start as soon as service is implemented and no later than January 1, 2022.

If you have any questions regarding comment 1 above, please contact Nilda Gemeniano of Public Works EPD at (626) 458-5184 or ngemenia@pw.lacounty.gov.

We request the opportunity to review the future environmental document when it is available. If you have any question or require additional information, please contact Mr. Jose Suarez of Public Works, Land Development Division at (626) 458-4921 or jsuarez@pw.lacounty.gov.

Toan Duong
Civil Engineer
Los Angeles County Public Works
Office: (626) 458-4921

Project Number	PRJ2019-000261
Plan Name	RPPL2019004511
Plan Type	Environmental
Work Class	Environmental Plan
Address	16949 Wedgeworth Drive

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SENT VIA USPS AND E-MAIL:

August 20, 2019

mhansberger@hlpusd.k12.ca.us

Mark Hansberger, Director

Hacienda La Puente Unified School District, Facilities Department

15959 East Gale Avenue

City of Industry, CA 91716

**Notice of Preparation of a Draft Environmental Impact Report for the Proposed
Wedgeworth K-8 School and Residential Development Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the Draft EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

South Coast AQMD has also developed both regional and localized significance thresholds. South Coast AQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

to South Coast AQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts. South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found here at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

- Chapter 11 “Mitigating the Impact of a Project” of South Coast AQMD’s *CEQA Air Quality Handbook* South Coast AQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- South Coast AQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR. For more information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385.

School Facilities

The California Public Resources Code 21151.8 and CEQA Guidelines Section 15186 establish special consultation requirements for school projects, which are meant to ensure that lead agencies consult with other public agencies, such as the local air district, to carefully examine and disclose the potential health impacts that may result from siting a school within one-fourth mile of facilities that may reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Based on the Project Description in the Notice of Preparation, the Proposed Project involves construction of a new elementary school. The Proposed Project is subject to the CEQA consultation requirements for school projects. South Coast AQMD staff recommends that the Lead Agency review the California Public Resources Code 21151.8 and CEQA Guidelines Section 15186. For a search of South Coast AQMD permitted facilities, please fill out the “Grid Search Request Form” that is available at: <http://www.aqmd.gov/docs/default-source/aqmd-forms/Permit/ab3205-request-form.pdf>.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling South Coast AQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at South Coast AQMD’s webpage at: <http://www.aqmd.gov>.

South Coast AQMD staff is available to work with the Lead Agency to ensure that project's air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190801-12

Control Number



SANITATION DISTRICTS OF LOS ANGELES COUNTY

Converting Waste Into Resources

Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400

Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998

(562) 699-7411 • www.lacsd.org

August 27, 2019

Ref. DOC 5249017

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

Dear Mr. Hansberger:

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

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

1. The wastewater flow originating from the proposed project from both phases will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Joint Outfall H Unit 7C Trunk Sewer, located in a private right of way along the north side of the San Jose Creek. The Districts' 33-inch diameter trunk sewer has a capacity of 24.1 million gallons per day (mgd) and conveyed a peak flow of 11.4 mgd when last measured in 2015.
2. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a capacity of 100 mgd and currently processes an average flow of 58.5 mgd. All biosolids and wastewater flows that exceed the capacity of the San Jose Creek WRP are diverted to and treated at the Joint Water Pollution Control Plant in the City of Carson.
3. The expected increase in average wastewater flow from the project, described in the document as a 600 student increase and 160 single family homes, is 36,960 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
4. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of

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

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

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

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
A. Howard

From: [Mark Hansberger](#)
To: [Dwayne Mears](#); [Elizabeth Kim](#)
Cc: [Helen Wise](#)
Subject: FW: Wedgeworth K-8 School and Residential Development Project
Date: Tuesday, August 20, 2019 11:08:13 AM

Dwayne and Elizabeth,

Please see the response received below.

Thanks

From: Administration Gabrieleno <admin@gabrielenoindians.org>
Sent: Monday, August 19, 2019 3:31 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Wedgeworth K-8 School and Residential Development Project

Dear Mark Hansberger,

Thank you for your letter dated July 29, 2019 regarding the Wedgeworth K-8 School and Residential Development Project. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail.

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



Attachments area

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From: [Mark Hansberger](#)
To: [Dwayne Mears](#); [Richard J. Walsh](#); [Annie N. Bui](#); [Elizabeth Kim](#)
Cc: [Kim Tran](#); [Helen Wise](#)
Subject: FW: Wedgeworth project
Date: Tuesday, August 27, 2019 1:36:52 PM

Good Afternoon,

The response below isn't a direct comment on the initial study. I am forwarding it to a group for your information.

Thanks

From: Roel, Reina <Reina.Roel@pomona.k12.ca.us>
Sent: Tuesday, August 27, 2019 11:33 AM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Wedgeworth project

Good Morning,

I am a citizen of Hacienda Heights (45 Years). I am very upset about the plans to build Wedgeworth a new school. The reason: There were discussions a little over a year ago about plans to close other elementary schools in the district, my daughters school being one of them. So the district has closed multiple schools already but we are planning to build a new one... This doesnt even begin to make sense.....

It is making many people in the community think... WHY are Wedgeworth students so entitled to a new school.. HMMMMM..... lets think about this question very carefully...

MY Question to you Mr. Hansberger: Why is it that the district is willing to spend so much money to build Wedgeworth a new school, when there are other schools already built that are low in enrollment and other school have been closed?

Reina Roel

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From: [Mark Hansberger](#)
To: [Dwayne Mears](#); [Elizabeth Kim](#)
Cc: [Helen Wise](#)
Subject: FW: Wedgeworth site
Date: Tuesday, August 27, 2019 1:51:41 PM

Good afternoon,

Please see the attached comments from a neighbor. This person also mentioned that they are an employee.

-----Original Message-----

From: Geri <gerirenz@aol.com>
Sent: Monday, August 26, 2019 5:08 PM
To: Mark Hansberger <mhansberger@hlpusd.k12.ca.us>
Subject: Wedgeworth site

Mr. Hansberger: I must state up front, not only am I a resident of the track this development will impact, I am also a District employee.

I only have two questions at present, since the development of the property may not happen in my lifetime:

1) Where is the parking for the new homes' cars and for the expanded school's staff and special events? It wasn't apparent on the site plan the District has distributed.

And 2) How is the County (or Caltrans) going to facilitate traffic flow? Specifically, Azusa and Pepperbrook, Wedgeworth and Ridge Park (both intersections), Manor Gate and Wedgeworth, Manor Gate and Pepperbrook, Countrywood and Wedgeworth, and Countrywood and Pepperbrook. These are all heavily used now, gridlocked during school start/finish times, and used as alternate route to Colima. With an additional approximate 400-600 cars, we may find it impossible to ever exit our neighborhood.

I look forward to your response and your consideration in addressing my concerns.

Geri Renswick

Homeowner on Ridge Park, Hacienda Heights

Sent from my iPadGR

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August 21, 2019

Hacienda La Puente Unified School District
Mark Hansberger, Director, Facilities
15959 E Gale Ave
City of Industry, CA 91716-0002
Re: Wedgeworth K-8 School and Residential Development

Dear Mr. Hansberger,

My name is Anthony Nunez and I am writing you on behalf of my family to express our concerns regarding the Wedgeworth Development. We have lived in Hacienda Heights since 1972 and include former students of several campuses within your school district, including Wilson High School where I graduated from in 2000.

Being long-time residents, we have seen HLPUSD continue to provide excellence in education to its students and we hold the community very dear to our hearts. We have also seen changes in the community, including several school campuses closing over the years and students having to travel further out to their schools. While the local student population has decreased over time and that schools close for valid reasons, it is vital that all details regarding such closures should be shared with the community since we are directly impacted as residents.

Our residence is two blocks away from the empty lot on Wedgeworth Ave and have been told numerous times what was to happen to the lot for many years, yet the lot has remained empty. However, over the last year, we have seen upgrades and renovations to the nearby Wedgeworth campus. Soon after, it came to our attention that HLPUSD was planning to expand the campus to become a K-8 facility and tear down the Highlander Little League Baseball Field in order to provide space for the expansion. As residents of the neighborhood, we are proud to have the Highlander Little League Baseball Field since it provides a safe place for children in our community to play athletic sports and be more physically and mentally active. It is known that the local AYSO Soccer and Softball Leagues lost their fields at the Cedarlane and La Subida campus fields. If the Highlander Baseball Field is torn down, it would be very disappointing to lose that since our children will not have access to any local sports fields.

Another major concern is the inclusion of up to 160 residences in the development. We strongly oppose this as residents of the neighborhood. Wedgeworth Dr is already a very busy street and is a major crossroad between Stimson Ave and Azusa Ave via Garo St, Fieldgate Ave and Sigman St to the west and Countrywood Ave and Pepperbrook Way to the east to gain access to the neighborhood. Adding more vehicles to that transit is simply not in the best interest of the community. This proposed area is also across the street from the Countrywood II condos off Wedgeworth Dr and Eagle Park Rd where parking has been extremely difficult along the entire complex and surrounding residences for many years. That same corner is also long overdue for a 4 way stop or a street signal, as it is a very dangerous for vehicles, bikers and pedestrians daily. The stretch between Ridge Park Dr and Forest Glen Dr is prime for speeding and drivers do not check both ways from the side streets before entering Wedgeworth Dr. Traffic is also very congested on Pepperbrook Way heading towards Azusa Ave and overflows onto Wedgeworth Dr. Wedgeworth Dr is also a traffic hazard during school drop-off and pickup times for Wedgeworth Elementary, Wilson High School, and Bixby Elementary, where drivers do not follow the directions given by school staff, crossing guards or the parking street signs. A possible increase in crime, noise and pollution due to additional residents is also very concerning. We hope that the Highlander Baseball Field will be included with the expansion and remain on site instead of unnecessary new housing.

We can all agree that it is wonderful that Wedgeworth Elementary has done so well academically and hope that the school continues to be one of the best campuses in the area. Therefore, we do not oppose any expansion to the Wedgeworth Elementary campus, as long as the community as a whole is considered. However, if the new development leads Wedgeworth to be a K-8 campus, then that would make two K-8 campuses within a mile apart and leaving Bixby Elementary in danger of a low student attendance and possibly closing. That would be very unfortunate as Bixby Elementary is the oldest campus in the area and is a vital part of the community. It is our hope that Bixby Elementary be thoroughly considered in this development as the campus would also be impacted by this development. Our community is proud of its history, its diversity and its recognition as a great town to live in. We hope that the HLPUSD is not driven by greed or have preference to an agenda and would seriously consider the community's concerns and requests. It is also very important that the community and school district provide clear communication to each other to avoid any misunderstandings or judgements. We look forward to hearing future updates regarding this development.

Thank you,



Anthony Nunez



Gabriela Navar
1535 Lark Tree Way
Hacienda Heights, CA 91745

August 26, 2019

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

Dear Mr. Hansberger

Thank you for the opportunity to comment on the Wedgeworth K-8 School and Residential Development Project. As a 30 year resident of Hacienda Heights that currently lives across the street from the current Wedgeworth Elementary School and has a child that attends Wedgeworth I have many concerns in regards to this project. My list of concerns are:

- a. Lack of community outreach.
- b. A school of this capacity and a housing development in this area will increase the amount of traffic in an already congested area.
- c. A school of this capacity and a housing development in this area will increase the amount of cars parked in an already congested area, where parking on residential streets is already difficult.
- d. A school of this capacity and a housing development in this area will increase the amount of trash in an area.
- e. A school of this capacity and a housing development in this area will increase energy use.
- f. A school of this capacity and a housing development in this area will cause an increase of greenhouse gasses.
- g. A school of this capacity and a housing development in this area will increase pollutants in the air. The increase in pollutants will add to an area that already has high health effects due to the proximity to the 60 freeway.
- h. A school of this capacity and a housing development in this area will eliminate a recreational area that is currently used for little league baseball and softball games.
- i. The closure of schools and sale of surplus property to build one school is also a matter of concern especially, when research shows that by 2030, only 1 out of every 5 Californians will be a child, as a result of declining birth rates. There is a history of declined enrollment in the state of California with a total of 34,135 fewer students enrolled this school year compared to last. This is more than four times the drop experienced the prior year. Until this year, the biggest single-year decline in the past five

Comment Letter Page 1

Gabriela Navar

years had been 8,783 from the 2014-15 to 2015-16 school year. The enrollment data is available on the California Department of Education Data Quest website under the "Student Demographics" category.

- j. Will the development of an underground storm water collection cause any issues to the foundation?
- k. Why has the Los Angeles County eliminated use of the current storm drain run-off to new construction?
- l. The children currently attending the school do not use the water fountains due to issue with the water, is the water quality up to standard for the kids to drink?
- m. Is there issues with the water quality in this location currently?
- n. Is there an issue with the storm water drainage in this area?
- o. Is there an issue with the water run-off in this area?
- p. A development of this nature will cause an extreme excess of fugitive dust. Fugitive dust will be released during the construction of this site. What steps are going to be taken to insure that our children and members of the community are not exposed to increased pollutants?
- q. A development of this nature will cause safety issues for the community and its children especially during school hours.
- r. Will safety measure be implemented?
- s. Will a police presentence increase?
- t. Currently many parents that drop off their children at the current Wedgeworth do not follow driving and traffic laws. Will a measure be implement to insure the safety of the children and the community?
- u. Has the Office of Emergency Management for Los Angeles County and the Governor's Office of Emergency Service reviewed the proposed plans and commented on evacuation measures or needs in case of a mandatory evacuation?
- v. The area in which this school and housing development is planned on is very condensed with limited exits. In case of an emergency the residents will have trouble evacuating the premises. What precautions will be implemented in order to avoid mass chaos in case of a mandatory evacuation
- w. In this initial report it states that that there are potentially significant impacts when it comes to 3 categories in relation to air quality
 - i. Conflict with or obstruct implementation of the air quality plan
 - ii. Net increase in criteria pollutants
 - iii. Exposure to substantial pollutant concentrations

How will these potential significant t impacts going to be address in order for them to become less than sign fact of an impact?
- x. Currently the South Coast Basin is in the path of non-attainment based on state and federal standards, a project of this magnitude does not help the South Coast Basin reach attainment.
- y. Noise levels can increase during the construction of this project and permanently once it is complete .These noise levels can be in excess of standards established in the local general plan or noise ordinance what measure will be implemented to ensure that this does not occur?

I am also requesting that alternatives to this project be suggested due the significant impacts that this project will create and that these alternatives be included in the Environmental Impact Report. I have also attached to this letter information that I obtain from the South Coast A.Q.M.D's "Air Quality Issues in School Site Selection Guidance Document" from June 2005(revised May 2007). I recommend that a detailed review of this document be conducted and addressed in the Environmental Impact Report. I hope that all my concerns will be addressed and again appreciate the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gabriela Navar".

Gabriela Navar
Concerned Resident and Parent

California Legislative Documents

1. SB352

Senate Bill 352 (Chapter 668, Statutes of 2003) became effective in January, 2004, making significant changes to existing rules on school site selection where new property is acquired. In particular, it expanded requirements for identifying and reviewing the impacts of facilities emitting hazardous air pollution or handling hazardous material or wastes within a ¼ mile (400 meter) radius of a new school site and created new requirements for sites within 500 feet (150 meters) of busy roadways.

If a proposed site boundary is within 500 feet of a busy roadway, the district must determine if air quality at the site poses a significant health risk to pupils. Another important element of the SB352 is the redefinition of "facilities within 1/4 mile" to mean "both permitted and non-permitted facilities, including but not limited to freeways, busy traffic corridors, large agricultural operations, and rail yards." This essentially requires not only contact with administering agencies, such as the air quality district, to obtain emissions data for permitted sources, but a survey of the area to identify any non-permitted sources within ¼ mile of the proposed site for risk analysis. Some important elements of the bill for school site selection are summarized in Table 3-13.

Table 3-13. Summary of Primary Changes to School Site Selection under SB352

Issues of Concern	Required Action Under the Law
Exposure of Students to Toxic and Criteria Air Pollutants	All potential sources (permitted and non-permitted) within 1/4 mile (400 m) of site must be surveyed and included in the risk assessment.
	Any school site within 500 feet (150 m) of a busy roadway must be assessed to show that neither short- nor long-term exposure poses a significant health risk.
	Non-permitted sources of air contaminants, such as large agricultural operations, roadways, and rail yards must be considered.

Source: More information is available from the California Department of Education at <http://www.cde.ca.gov/ls/fa/st/sb352.asp>. The official bill is available at the California Senate website at http://info.sen.ca.gov/pub/03-04/bill/sen/sb_0351-0400/sb_352_bill_20031003_chaptered.html.

²¹ Information based on *Guidance Manual Methyl Bromide (in Combination with Chloropicrin) Field Soil Fumigation*, CAL/EPA Department of Pesticide Regulation, December 8, 2004 at <http://www.cdpr.ca.gov/docs/countr/training/methbrom/mebrman.pdf>

Table 2-5. CARB Distance Recommendations for Siting Sensitive Receptors near Eight Existing Source Categories, Relative Increased Cancer Risk, and Justifications

Source Category	CARB Advisory Recommendations	Increased Cancer Risk Over 70 Year Exposure to (chances in a million)	Summary of Basis for Recommendations
Freeways and High-Traffic Roadways	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.	300-1700	In traffic-related studies, the additional non-cancer health risk attributable to proximity to the roadway was strongest between 300 and 1,000 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week). Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.	Up to 500	Because ARB regulations will restrict truck idling at distribution centers, transport refrigeration unit (TRU) operations are the largest onsite diesel PM emission source followed by truck travel in and out of distribution centers. Based on ARB and South Coast District emissions and modeling analyses, we estimate an 80 percent drop-off in pollutant concentrations at approximately 1,000 feet from a distribution center.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.	Up to 500	The air quality modeling conducted for the Roseville Rail Yard Study predicted the highest impact is within 1,000 feet of the Yard, and is associated with service and maintenance activities. The next highest impact is between a half to one mile of the Yard, depending on wind direction and intensity.

Freeways and Other High-Traffic Roadways

Motor vehicle exhaust is a major contributor to both criteria and toxic air pollution. Pollutants emitted from busy roadways include NO_x, CO, particulate matter, especially PM_{2.5} emitted in diesel exhaust and PM₁₀ emitted from brake and re-entrained road dust, as well as a range of air toxics emitted in exhaust. Multiple air pollution studies both within and outside of California have indicated that living, working, and/or attending school within close proximity to high traffic roadways and the exposure to associated emissions may lead to exacerbation of adverse health effects beyond those associated with regional air pollution levels, particularly for sensitive receptors such as children [see, e.g., several sources cited in “Freeways and High Traffic Roads” in CARB’s Air Quality and Land Use Handbook (2005)]. These health effects include a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. There are also significant concerns with diesel PM, formaldehyde, benzene, PAHs, 1,3-butadiene, and other known carcinogens found in motor vehicle exhaust near busy roadways. A key observation of several near-roadway studies is that increased proximity increases exposure and enhances the potential for adverse health effects from inhalation of roadway pollutants.²

² Information based on CARB’s “Air Quality and Land Use Handbook: A Community Health Perspective” (2005) and other sources.

Table 3-8. Major Sources of Air Pollutant Emissions and Recommendations from CARB's *Air Quality and Land Use Handbook*

Issues of Concern	Relation to Air Quality	Proposed Solution
Freeways and High-Traffic Roadways	Roadways are significant sources of diesel PM and other mobile-source air toxics.	Avoid siting new sensitive land uses within 500 feet of freeways, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	Traffic into and out of distribution centers, and use of transport refrigeration units (TRUs) are significant emitters of diesel PM and other air toxics.	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs per day, or where TRU unit operations exceed 300 hours per week).
		Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	Train and associated traffic can be large emitters of diesel PM and other air toxics.	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard.
		Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.

Based on the discussions of mobile sources and stationary sources above, best practice indicates that school sites should be selected with a buffer of no less than 500 feet and probably as much as 1,000 feet from major roadways and about ¼ mile from stationary sources. It is also emphasized that no school should be placed within 1,000 feet of a metal plating operation, and generally they should avoid being placed downwind of major ports. It is clear from the figure that these two sites meet the distance criteria from metal plating and other stationary sources. The upper school meets all distance criteria from major roadways, while the lower school meets the minimum 500 feet criteria from the 710 Freeway, it does not meet the 1,000 feet criteria. However, both of these schools, and several others, have relatively close proximity to the Ports of Los Angeles and Long Beach.

These two schools serve only as examples. Selecting sites for new schools should consider distances from existing major and minor stationary sources, mobile sources, and any agricultural sources, as discussed in Section 2 to help assess if the location is appropriate for a new school site.

TO: Mr MARK HANSBERGER
HLPOSD Director Facilities


8-26-2019

I AM completely AGAINST The expansion of Wedgeworth School AND creating new housing. This will have a big impact by adding Traffic congestion To The Already congested Area. When I voted for The school bonds I thought it was To add more Teachers and smaller class sizes NOT Take Away from our community. The proposed school and additional housing will also remove The baseball field That our youth has played on for years. Where will The Kids go?

We have already lost 2 fields The Kids play on.

Cars already park on our street To drop off Their Kids

Wedgeworth Ave is a thru street for all Traffic from The other side of Wilson HS To AZUSA AVE and we have Trouble getting out of streets now.

Thank you 

George OJANEZ
16915 Shady Meadow Dr
Hacienda, CA 91745
Tel 626 964 1351

Attn.

Mr. Mark Hansberger

Aug 19 - 2019

We live on the corner of Pepperbrook and Manor Gate Rd. and have lived here for 45 years. We are not in a position to relocate to a different area just to get away from all the traffic. We know that our area is an older one and there are few children in our area to fill the school.

We are not in favor of making Wedgeworth a K-8 school. Wedgeworth has become a full immersion school. Most kids do not live in this area and are brought in from different cities. In the past this was never allowed. The traffic on Manor Gate in the morning and early afternoon is becoming a nightmare. We cannot leave or enter our driveway during that time. People are so rude and won't take the time to let you out or in.

According to the picture, Manor Gate will continue into the proposed residential driveway and the way in and out will be on Manor Gate or Wedgeworth. Most people take Manor Gate because of all the traffic on Pepperbrook and they can't get out from Wedgeworth.

Another problem the traffic has is where will all these ^{cars} park when the school has a special functions. Well they will be up and down our streets and block our driveways and block our mailboxes so we can't get our mail.

Please !!

We urge you to reconsider this project due to the high volume of traffic in our area.

Thank you !

Anna Traliet
1651 Manor Gate Rd.
Hacienda Hts. Ca. 91745

Attn.

Mr. Mark Hansberger

Aug 19-2019

We live on the corner of Pepperbrook and Manor Gate Rd, and have lived here for 45 years. We are not in a position to relocate to a different area just to get away from all the traffic and we love our neighborhood. We know our area is older and there are few children in our area to fill the school.

But, we are not in favor of making Wedgeworth a K-8 school. We have been informed that Wedgeworth has become a full immersion school. Most kids attending do not live in this area and are brought in from different cities just to attend this school. In the past, this was never allowed. The Traffic on Manor Gate in the morning and early afternoon is becoming a nightmare. We cannot leave or enter our driveway during that. People are so rude and won't let you in or out.

According to the picture, Manor Gate will continue into the proposed residential driveway and the only way in or out will be on Manor Gate. They can hardly get out on Wedgeworth because of all the traffic on Pepperbrook. Manor Gate has a 4 way stop so everyone stops here.

Another problem the traffic has is where will all the cars park when the school has special functions? Well they will be up and down our streets and block our driveways and mail boxes so we can't get our mail

Please! we urge you to reconsider

this project due to the high volume of traffic this will create in our area.

Thank you,

Sincerely

Erich Trabert

1051 Manor Gate Rd

Hacienda Hts, Ca. 91745

FERNANDO CUBILLAS
1624 MANOR GATE RD.
HACIENDA HEIGHTS, CA 91745
323 215-5155 CELL
E-MAIL: fernandocubillas@hotmail.com

Dear Mark,

It was nice meeting you last week. Since then I've met with the Neighbors, school workers and some school Principal's. We are very worried about the traffic in our neighborhood.

School Attendance

Wedgeworth Elementary School	594
Bixby Elementary School	278
Cedarlene Elementary School	245
Cedarlene Middle School	355
Grazide Elementary School	603
Mesa Robles Elementary School	450
Mesa Robles Middle School	650
Los Altos Elementary School	465
Glen A Wilson High School	1475
Glenelder Elementary School Sold in Escrow.	

How many kids going to Wedgeworth are out of the area?

How many kids living in the neighborhood going to Wedgeworth?

When I went to Dibble Elementary, we walked to school.

Bixby numbers are Very Low.

When I went to Wilson HS attendance was 2200.

Cedarlene total attendance is only 600.

Cedarlene Middle school only 355 very low.

How much was Glenelder Sold for?

Where will are Kids play Little League Baseball if we lose the fields?

The Neighborhood home owners would like a special meeting with the School District. We need more time than Board of Education Meeting to talk about the Project.

I'm now talking to my lawyer on all legal options.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fernando', followed by a long horizontal flourish.

Fernando Cubillas

Wilson HS Class of 1976

Marcie and Ramiro Puentes
17064 Pepper Brook Way
Hacienda Heights, CA 91745

August 20, 2019

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

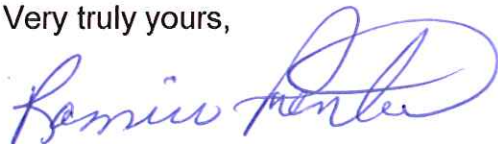
Dear Mr. Hansberger:

We are not very happy with the proposed Wedgeworth K-8 and Residential Development Project. Wedgeworth Drive is so busy that it is dangerous. The residents who are close to the school have suffered enough. Now you are going to expand! There are four schools so close together in the general area. So many students come from other areas and also impact the traffic, noise, and environment. That is not fair! And it is unsafe for the students and residents in the area.

Many times it is impossible to drive on Wedgeworth. Then it impacts the other streets. It is dangerous for pedestrians. You have created a dangerous community.

We are urging you to reconsider the proposed expansion. The area cannot take any more traffic, noise, and air pollution.

Very truly yours,



Ramiro Puentes



Marcie Puentes

Dear Mr. Hansberger

August 12,2019

This letter is in response to the Draft Environmental Impact Report for the Wedgeworth school Project. To start, this project includes a developer being allowed to build 160 units. How would this be part of a school project approval except to sell property to an interested party requesting its inclusion?

Also a question arises as to why K-8? There has been a long standing policy to keep these ages separated for many reasons I am not going in to here.

There would be great impact on noise, population and traffic. Environmental factors potentially effected would include aesthetics, land use, population and public services. The planned townhomes do not coincide with community plan and they are not compatible with the adjacent homes. The condos on the other side of the school property have no homes next to them.

The destruction of the baseball fields certainly does not fit in with the community at all as you have taken away soccer fields and softball fields from our youth to sell school properties. Communities have been shocked by the lack of concern by the superintendent and school board. There has been no transparency and information has been withheld from several communities. This area was never meant to have an increase in the population such as you have planned, nor destroy a very important part of the community in the baseball fields. These fields and the sport of baseball are both extremely important to the education and development of our children, which is not seen in the classroom. The "open space and recreation" referred to in the report is a joke. That area would be fenced in and unavailable to the community. The adverse physical effect of destroying the fields is definitely a negative environmental problem. However the old school property could be used for a beautiful park for everyone. You are are not meeting the community interest here.

A health risk is brought on by the increase in traffic and the vehicle emissions. The emissions would definitely have an odor. Yes the traffic is horrible already; to double or triple that is wrong. I have seen the dangers as both sides of Wedgeworth and the streets that feed into it are packed with parked cars. I just saw 3 emergency vehicles coming through to Wedgeworth and it was scary with the backup of traffic. When the fire engine was leaving, it found it could not take its normal route and had to take a street that does not go straight through to Pepperbrook.

The cars are coming all the way from the freeway to Pepperbrook and down each of the streets leading to Wedgeworth. These cars are coming from outside of this community, the number of which should be recalculated because it is more than the 7% that I was told. Many families are using addresses that are not their own. So I believe another look should be taken at this number. We wouldn't want families outside of this community making decisions that bring problems to our community.

The age level of the upper grades being moved here brings concerns of loitering, trash, noise and other problems. The project would definitely "induce substantial unplanned population growth." And it also displaces substantial numbers of baseball family.

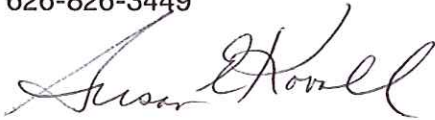
Public services will be affected due to the increase in population and traffic. Currently there are less than 500 students. This plan more than doubles that for student numbers of 1200 and more when you add the teachers and staff. It would increase by at least 2/3 more with home owners or worse yet, renters. Fire protection and police protection would be significantly impacted due firstly due to the traffic. The drivers already block access to ramps for special needs. U- turns successful and non successful block traffic and cause danger especially when people let there children out on the street side of Wedgeworth and cross in the middle of the street.

If there were a disaster or an emergency to the community, there would only be blocked streets. The exit route to Azusa and Colima so impacted that a quick exit from this area by car, disrupted or impossible. You only make reference to not physically altering Azusa, Hacienda and Colima. But they would be affected. There is a huge impact that needs to be addressed not overlooked .

There is a solution which the superintendent and school board, maybe even our LA Supervisor, have failed to take into consideration. So much wasted money could be saved. A new permanent school could be built for grades k-5, the baseball fields saved after a new design by the architect would make use of the land Wedgeworth school currently resides on ,and the community would be happy. There would no longer be a need to sell land for a 50 million dollar plus school. Saved money could also be used to make Cedarlane a more attractive school for the parents at Wedgeworth who are resistant to going there.

Just one more thing. Pay more attention to the words used in the report about the Little League Field that has been utilized for 40 yrs or more. These baseball fields provide "beneficial recreational opportunities and meet community interest." Yes it would be great for them to continue to be there for OUR community.

Thank you,
Sue Kovall
1501 Lark Tree Way
Hacienda Heights, Ca 91745
Tel. 626-826-3449

A handwritten signature in cursive script, appearing to read "Sue Kovall", written in dark ink.

Dear Mr. Hansberger

Aug 16, 2019

This Letter is in response to the Draft Environmental Impact Report for The Wedgworth School School Project.

There would be a dramatic increase in population, noise, traffic, crime etc. The traffic, since I moved in back in the 1980's has been unbelievable. To double or triple that is insane and incomprehensible in this community. During the day, there is no parking to be had.

The Age Level of the upgraders being moved here brings a plethora of potential problems.

The destruction of the baseball fields is just plain wrong on so many levels.

Thank you
Tony Truller
1502 Clark Tree Way
Hacienda Hts, CA 91745

8-24-2019

Mark Nansberger
Director Facilities

Project: Wedgewood K-8 School
Residential Development Project

We've lived in our home over 40 years
Within in the last five years the school
added more students. Now they want to
have 1,200 students.

traffic is out of control
can't get out of my garage for Dr. appt.

They block my driveway

Park in front of my house the curb
is painted Red and the Park

and get out of their cars and walk
their Red across the street

make U turns in the middle
of the street.

Stop in middle of street and let
their kids off.

They speed up the street.

New Site homes

The parking on the streets

There is no parking

Crime is going to go up

Homes too close to school

Wheel trafficking

Breaking in to cars

Breaking into our homes

Highland Field

Kids need a place to play
Sports.

We don't need more families in
the area.

Troffei is going to be a
night mare.

When we moved in we were told
that the field was going to
be a Park. which never
happened.

Rita Macias

RITA MACIAS

1504 MANOR GATE RD

HACIENDA HGTS CA 91745

626 810-8997

~~Sam Mac~~

JANNY MACIAS

ANTHONY MACIAS

~~Sam Mac~~

STEVEN MACIAS

~~Sam Mac~~

ERIC MACIAS

~~Sam Mac~~

August 26, 2019

Mr. Mark Hansberger, Director, Facilities
15959 East Gale Avenue
City of Industry, CA 91716

Dear Sir:

We were invited to send our concerns to you regarding the Wedgeworth School Residential Development Project, Assessor's Parcel Number 8209-001-901.

Traffic on Pepper Brook trying to get to Azusa and the Freeway is often lined up to Manor Gate and even as far as Orchard Hill.

Traffic on Colima trying to get to Azusa and the Freeway is also often really backed up even when unrelated to the school schedule. Our neighborhood has few access routes and another 320 drivers will create more delays and congestion. (160 units will probably represent 2 adults and several teen drivers.)

Please consider the condominiums on Wedgeworth (across from Wilson High) as an example. The parking along Wedgeworth across from the condominiums weekends and evenings is very heavy. They have inadequately provided for their homeowners. When people are parked on both sides of the street it is difficult for two vehicles to pass from opposite directions and a danger to our kids as they try to cross the street. From what I can see from your tentative plans you are also providing inadequate parking so they will end up parking on existing streets increasing inconvenience, safety issues and decreasing property values for the current home owners.

There are currently four schools within one mile along the two lane Wedgeworth Drive: Wedgeworth, Bixby, Wilson High School and Cedar Lane already cause traffic issues.

Traffic on Manor Gate during the drop-off/pick-up of Wedgeworth students is also a concern. People park in front of driveways and prevent homeowners from entering their own garages. (I have had to drive around the block and wait for a car to move before I could get into my driveway/garage. That was this school year, imagine if you double the number of students.) Not to mention how difficult it is to see on-coming traffic when so many are parked on the street blocking our view. I notice you are planning a "Drop Off" area but it is inadequate for 600 students much less 12--. Visitor parking is also too small for current student body.

Our children NEED the baseball fields. The property was meant to be used by the children. Please reconsider this move.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anna Sievert".

Anna and David Sievert, Home Owner
1545 Manor Gate Road
Hacienda Heights, CA 91745

cc: Hacienda-La Puente School Board
LA County Regional Planning Commission, Plan Check Division


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

My name is Christine Salazar and I am responding to the Notice of Preparation for the Wedgeworth K-8 School and Residential Development Project. This project will be a bad investment of the community. Not only will it take away the Highlander Baseball Complex, a 40-year-old complex, it will take away a recreational space in the area where more than 400 kids benefit from. Where will the Hacienda Heights Little League play?

Next, we do not need another middle school when we have Cederlane just down a few blocks. We do not need to increase the capacity of this school to nearly double when we are at a decline of enrollment district wide.

Finally, 160 residential units in just 10 acres is insane. The traffic is very bad now – you expect the area not to be affected with 160 units? With 1200 students going to this school? Especially when the district is trying to focus on Intra-district enrollment? The traffic will be terrible and will impact the community greatly.

Thank you

A handwritten signature in dark ink, appearing to read 'Christine Salazar', written in a cursive style. The signature is positioned to the right of the printed name 'Christine Salazar'.

Christine Salazar

1604 Manor Gate Road
Hacienda Heights, CA 91745
August 26, 2019

Hacienda La Puente
Unified School District
Mark Handberg, Director
15959 E. Hole Avenue
City of Industry, CA 91716-0002

Re: Wedgeworth Project

Gentlemen:

Please do not build 160 residential units near Manor Gate Road. We already have parking and traffic problems. This project will make things worse. The traffic is also very bad on Pepper Brook going out to the 60 freeway via Azusa Avenue. That area also will become a nightmare. Let us not forget that the Puente Hills Mall is on Azusa Avenue.

The air and noise pollution will become unbearable. This is bad for young and old alike. Please do not build 160 units in this area. Thank you.

Sincerely,
Rosalie Soto

From: [Adriana Quinones](#)
To: [Cynthia Parulan-Colfer](#); [Annie N. Bui](#); [Mark Hansberger](#); [Martin Medrano](#); [Anthony Duarte](#); [Joseph K. Chang](#); [Gino Kwok](#); [Jeffrey DeLaTorre](#); [mikewilliamsinh@roadrunner.com](#)
Cc: [erika.flores@mail.house.gov](#); [ruby.duenas@asm.ca.gov](#); [Lauren Yokomizo](#); [nholden@bos.lacounty.gov](#); [latinamz@aol.com](#); [Andrea Gordon](#); [kyle.miller@sen.ca.gov](#); [mikewilliamsinh@roadrunner.com](#); [henryperegona@aol.com](#); [edwrad9@aol.com](#); [Scott Martin](#); [lindexinc@hotmail.com](#); [gena.ooi@ibps.org](#); [geri.kleinpell@realtyworld1.com](#); [diego.hhia@gmail.com](#); [Randy Black](#); [tedchanggh@gmail.com](#); [Kuo Shou-Jen](#); [mrsjiennkelley@gmail.com](#); [dsalcedo4HHIA@gmail.com](#); [hhl.info@gmail.com](#); [beatrizricartti@yahoo.com](#)
Subject: Wedgeworth Proposed Project
Date: Wednesday, August 28, 2019 12:21:41 AM

Good evening HLPUSD Board Members and Superintendent,

First of all, our communities of Hacienda Heights/La Puente are extremely upset and disappointed about the lack or limited information regarding the sale of the three schools, proposed construction of Wedgeworth Elementary school.

We are requesting that you stop any action or project until you send letters to all residents (including La Puente), allow time for community feedback , have Town Hall meetings.

Many of us opposed the construction close to twenty years ago. We never imagined that Board would bring back the idea and not include the community in such big project.

A resident spoke to the architect and was told the starting price was \$52 million dollars but could be as high as \$70 million.

One of the reasons the residents opposed the construction was because there are two schools very close by (Bixby and Cedarlane). Many residents in both Hacienda Heights and La Puente would like to see this funds utilized in improving existing schools and programs.

Another reason is the environmental impact to our community. We already have heavy traffic in the morning between the four schools located within a few blocks of each other (Wilson High, Bixby Elementary, Cedarlane Academy and Wedworth Elementary).

Some residents have also expressed concerns regarding their health with the turning of dirt, heavy construction, play areas close to fwy.

Keep in mind we see many cars coming from 60 Fwy, Sigman, Stimson, Coutrywood etc) because many children do not reside in Hacienda Heights and are driven here. There is also a push to recruit International students.

Our children have been loosing playgrounds, they now have to go to another city to play soccer (AYSO). Now the board wants to displace over 450 children from the baseball field that has been available for them to play for over forty years. Simply not acceptable.

Instead of more development, we need to keep the Highlander baseball, construct a sports complex, Improvements on Bixby.

The Board has to remember that we elected them to represent our community and also be accountable to the community.

We, the residents voted for a bond to improve all of the schools in our district and not to be fiscally irresponsible by spending over 52 million dollars on one school (unnecessarily)

As far as the funding for the construction, we have not had presentations made to the community as how you plan to pay for the construction.

Our communities are also asking for Los Angeles Supervisor Hahn, State Senator Archuleta, State Assemblyman

Calderon, Congressman Cisneros to have their Education and Legal Departments to look at the way all of this sales, developments have been approved by the board without what is viewed by the community as no oversight or very limited oversight. Perhaps there should be possible legislation in the future to ensure Schools districts have much more oversight and community input.

In all my years in Hacienda Hrights, i have never seen so much distrust and anger towards the school board and Superintendent. There are conversations regarding recalling the board (except De La Torre) and asking for resignation of Superintendent.

We are requesting that you stop all actions and construction until the community is engaged, feedback is provided, environmental impact surveys are done and several proposals are presented to the communities (Hacienda Heights and La Puente).

Respectfully,

Adriana Quiñones
Community Activist/Hacienda Heights Resident
Sajest3@me.com
(626) 494-0319

Make a difference every day!

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