TO: Members of the Board of Trustees  
FROM: Adriana D. Barrera, Interim Chancellor  
DATE: April 16, 2014  
SUBJECT: BOARD LETTER FOR APRIL 23, 2014 MEETING

## Board Meeting Location

Next week’s Board meeting will be held at the **Educational Services Center**. The meeting times and locations are as follows:

<table>
<thead>
<tr>
<th>Meetings</th>
<th>Time</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ad Hoc Committee on Adult Education and Workforce Development Meeting</td>
<td>1:00 p.m. to 2:00 p.m.</td>
<td>Board Room</td>
</tr>
<tr>
<td>Break</td>
<td>2:00 p.m. to 2:15 p.m.</td>
<td></td>
</tr>
<tr>
<td>Budget &amp; Finance Committee Meeting</td>
<td>2:15 p.m. to 3:15 p.m.</td>
<td>Board Room</td>
</tr>
<tr>
<td>Break</td>
<td>3:15 p.m. to 3:30 p.m.</td>
<td></td>
</tr>
<tr>
<td>Convene for Public Session</td>
<td>3:30 p.m.</td>
<td>Board Room</td>
</tr>
<tr>
<td>Recess to Closed Session</td>
<td>Immediately Following Public Session</td>
<td>Hearing Room</td>
</tr>
</tbody>
</table>

### Ad Hoc Committee on Adult Education and Workforce Development Committee Meeting (Eng Chair, Moreno, Svonkin.)

The committee will meet from 1:00 p.m. to 2:00 p.m. in the **Board Room**. For the committee’s agenda refer to Attachment A.

### Budget & Finance Committee Meeting (Svonkin Chair, Eng, Moreno)

The committee will meet from 2:15 p.m. to 3:15 p.m. in the **Board Room**. For the committee’s agenda refer to Attachment B.

### Agenda Format

Under Reports from the Chancellor, the following will take place:

- Reports from the Chancellor regarding District activities or pending issues
  - Presentation on Los Angeles Mission College’s Science Technology Engineering and Math (STEM) Program: Student Success, Completion, and Institutionalization

### Confidential Matters

The attached correspondence is confidential and should not be shared with other persons.

- **Office of General Counsel**
  - Enclosed for your review is background information pertaining to District-related litigation matters. *(Refer to Attachment C)*
Enclosed for your review is the Bond-related Litigation Report. *(Refer to Attachment D)*
Enclosed for your review is an update pertaining to the status on personnel actions. *(Refer to Attachment E)*
Enclosed for your review is an update pertaining to complaints of discrimination/harassment. *(Refer to Attachment F)*

- **Human Resources**
  - Enclosed for your review is information pertaining to a personnel matter*. *(Refer to Attachment G)*

- **Office of Diversity Programs**
  - Enclosed for your information is an Appeal to Letter to Determination. *(Refer to Attachment H)*

**Other Matters**
- Enclosed for your review is background information pertaining to a Public Hearing on Subsequent Environmental Impact Report for the Firestone Educational Center being held under Recommendations from the Chancellor during the Public Session*. *(Refer to Attachment I)*
- *Due to the volume of materials for the personnel matter and public hearing matter, these documents will be sent via U.S. mail.

Please let me know should you have any questions regarding the meeting.
I. ROLL CALL

II. PUBLIC SPEAKERS*

III. REPORTS/RECOMMENDATIONS/ACTION

A. Internal Audit Quarterly Update
   Disposition:

B. Districtwide/College Marketing, Outreach, and Recruitment Survey
   Disposition:

C. Use of Funds from Distribution of 2012-13 General Revenue Recal
   Disposition:

D. Update of Financial Projections by College
   Disposition:

E. List of Formal Procurement Activities
   Disposition:

IV. FUTURE DISCUSSION/AGENDA ITEMS

   • Update on Cost Savings from Master Agreements (Chancellor’s Directive #142)
   • Schedule for Districtwide Bids on Major Items
   • Retirement Incentives

V. FUTURE BUDGET & FINANCE COMMITTEE MEETING DATES

   • May 14, 2014
VI. NEW BUSINESS

VII. SUMMARY – NEXT MEETING

VIII. ADJOURNMENT

*Members of the public are allotted five minutes time to address the agenda issues.

If requested, the agenda shall be made available in appropriate alternate formats to persons with a disability, as required by Section 202 of the American with Disabilities Act of 1990 (42 U.S.C. Section 12132), and the rules and regulations adopted in implementation thereof. The agenda shall include information regarding how, for whom, and when a request for disability-related modification or accommodation, including auxiliary aids or services may be made by a person with a disability who requires a modification or accommodation in order to participate in the public meeting.

To make such a request, please contact the Executive Secretary to the Board of Trustees at 213/891-2044 no later than 12 p.m. (noon) on the Tuesday prior to the Board meeting.
2013 FIRESTONE EDUCATION CENTER
MASTER PLAN

SUBSEQUENT FINAL
ENVIRONMENTAL IMPACT REPORT

Prepared for

LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 Wilshire Boulevard
Los Angeles, CA 90017

Prepared by

TERRY A. HAYES ASSOCIATES INC.
8522 National Boulevard, Suite 102
Culver City, CA 90232

March 27, 2014
TABLE OF CONTENTS

SUBSEQUENT DRAFT EIR
(Published January 2013 under separate cover)

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 INTRODUCTION</td>
<td>1-1</td>
</tr>
<tr>
<td>1.1 Lead Agency</td>
<td>1-1</td>
</tr>
<tr>
<td>1.2 Intended Use of the Subsequent Final EIR</td>
<td>1-1</td>
</tr>
<tr>
<td>1.3 Summary of the Proposed Project</td>
<td>1-2</td>
</tr>
<tr>
<td>1.4 Summary of Proposed Project Impacts</td>
<td>1-2</td>
</tr>
<tr>
<td>1.5 Noticing and Availability of the Subsequent Draft EIR</td>
<td>1-3</td>
</tr>
<tr>
<td>2.0 RESPONSES TO COMMENTS</td>
<td>2-1</td>
</tr>
<tr>
<td>2.1 Public Review</td>
<td>2-1</td>
</tr>
<tr>
<td>2.2 Public Meeting Comments</td>
<td>2-1</td>
</tr>
<tr>
<td>2.3 Written Comments</td>
<td>2-2</td>
</tr>
<tr>
<td>3.0 CORRECTIONS AND ADDITIONS</td>
<td>3-1</td>
</tr>
</tbody>
</table>

Appendix A Queuing Analysis Worksheets
1.0 INTRODUCTION

This Subsequent Final Environmental Impact Report (EIR) has been prepared pursuant to the requirements of California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et seq., and the guidelines promulgated in connection therewith at Title 14 Code of California Regulation (CCR) Section 15000 et seq. (the “CEQA Guidelines”). The Subsequent Final EIR together with the Subsequent Draft EIR published in January 2014 addresses the potential environmental effects resulting from the implementation of the 2013 Firestone Education Center Master Plan (proposed project).

1.1 LEAD AGENCY

The Los Angeles Community College District (LACCD) is the Lead Agency in accordance with Section 15367 of the CEQA Guidelines, which defines the lead agency as “the public agency that has the principal responsibility for carrying out or approving the project.” The project proponent, as well as CEQA Lead Agency for the proposed project is:

Los Angeles Community College District
Thomas Hall, Executive Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

1.2 INTENDED USE OF THE SUBSEQUENT FINAL EIR

This Subsequent Final EIR was prepared at the direction and under the supervision of the LACCD. The intended use of this EIR is to assist the LACCD Board of Trustees in making decisions regarding the approval and implementation of the proposed project. This Subsequent Final EIR is required under Section 15132 of the CEQA Guidelines to include the Subsequent Draft EIR or a revised version; comments and recommendations received on the Subsequent Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Subsequent Draft EIR; responses to those comments; and any other relevant information added by the lead agency. The public review for the Subsequent Draft EIR began on January 17, 2014 and closed on March 3, 2014 (a total of 45 days). This document summarizes the project information presented in the Subsequent Draft EIR and contains responses to comments received on the Subsequent Draft EIR.

This Subsequent Final EIR is the primary reference document for the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with the CEQA Guidelines (14 CCR Section 15000 et seq.), if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., unavoidable significant impacts), the agency shall state in writing the specific reasons for approving the project based on the final CEQA documents and any other information in the public record for the project (CEQA Guidelines Section 15093, subd. (b)). This is called a “statement of overriding considerations” (CEQA Guidelines Section 15093). This Subsequent Final EIR along with a MMRP and an accompanying statement of overriding considerations will be submitted to the LACCD Board of Trustees for action as part of requested certification of the Subsequent Final EIR.
1.3 SUMMARY OF THE PROPOSED PROJECT

Implementation of the proposed project consists of the construction and operation of the Firestone Education Center (FEC), a new LACCD satellite campus that would replace the existing South Gate Educational Center (SGEC), provide for expanded and improved educational facilities, and accommodate existing and projected student enrollment. The FEC would accommodate up to 9,000 students. The timeframe for this level of enrollment is uncertain; however, for purposes of analysis, based on LACCD projections it is assumed that student enrollment capacity would be met in 2031.1 The FEC would offer academic programs parallel to those available at the main ELAC campus and allow students to complete their degree and transfer requirements at one convenient location.

The proposed project includes the demolition of the 220,550-square-foot Building 4 and its connections to Building 3, and the construction of a new 100,000-gross-square-foot building and an approximately 1,600-space parking structure on the northern portion of the project site.2 In addition, the project site would be improved with an approximately 60-space surface parking lot, landscaping, an open space area, and other outdoor amenities. Vehicular access and circulation improvements would also be implemented on- and off-site. Buildings 1, 2, and 3 would not be used for college uses, and LACCD would continue to lease these facilities to tenants for warehousing and other appropriate uses. Existing uses within Building 4 would be relocated to Building 1 or 3. The final design would result from the collaboration of ELAC and a Design/Build Team selected to carry the proposed project forward.

1.4 SUMMARY OF PROPOSED PROJECT IMPACTS

Impacts of the proposed project fall into four categories: 1) significant and unavoidable impacts that cannot be mitigated to a less-than-significant level, 2) potentially significant impacts that can be mitigated to a less-than-significant level, 3) less-than-significant impacts without mitigation, or 4) no impact. The Subsequent Draft EIR determined that the proposed project would have unavoidable significant impacts on the following:

- **Cultural Resources (Historical Resources).** Due to the removal of Building 4 and its connections to Building 3, the proposed project would create significant and unavoidable impacts related to historical resources. Mitigation measures are proposed to address these impacts; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Noise (Construction).** Noise generated by construction of the proposed project would exceed the City’s significance threshold at residential land uses north and east of the proposed project site resulting in significant and unavoidable impacts related to noise. Mitigation measures are proposed to address this impact; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Transportation and Traffic (Circulation System and Congestion Management Plan).** New vehicle trips resulting from the proposed project would create significant and unavoidable impacts related to the circulation system (i.e., intersection operations and Congestion Management Plan [CMP]). Mitigation measures are proposed to address impacts related to the circulation system; however, no feasible mitigation measures were identified to reduce all of the significant impacts to a less-than-significant level. No feasible mitigation measures were identified to reduce the significant impact related to the CMP (i.e., intersection) to a less-than-significant level.

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1 Depending on a number of factors including the economy, State funding and growth restrictions, and availability of educational facilities elsewhere, the date when this level of enrollment could occur may be delayed.

2 Building 4 is connected to Building 3 through a first floor passageway, a third floor bridge, and a building extension.
1.5 NOTICING AND AVAILABILITY OF THE SUBSEQUENT DRAFT EIR

In compliance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for the Subsequent Draft EIR was issued on December 14, 2012 for a 30-day public review period. The Subsequent Draft EIR was then made available for a 45-day public review period beginning January 17, 2014 through March 3, 2014. During this period, 12 written comments on the Subsequent Draft EIR were received. In addition, two public meetings were held during the review period on February 5, 2014 and February 19, 2014 to receive public comments on the Subsequent Draft EIR.
2.0 RESPONSES TO COMMENTS FROM PERSONS AND ORGANIZATIONS CONSULTED

This chapter contains responses to all of the comments received by the Los Angeles Community College District (LACCD) during the public review period for the proposed 2013 Firestone Education Center Master Plan (proposed project) Subsequent Draft Environmental Impact Report (EIR). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, detailed responses to comments on environmental issues have been provided below that describe the disposition of significant environmental issues raised. Reasons are provided when recommendations, suggestions, and objections raised in comments letters were not accepted. Issues raised by the public in response to the Subsequent Draft EIR warrant clarification or correction of certain statements in the Subsequent Draft EIR but none of the corrections and additions constitute significant new information as defined by CEQA Guidelines Section 15088.5.

2.1 PUBLIC REVIEW

In accordance with CEQA Guidelines Sections 15087 and 15105, this Subsequent Draft EIR was made available for a 45-day public review period that began on January 17, 2014 and concluded March 3, 2014. On January 16, 2014, a Notice of Availability (NOA) of the Subsequent Draft EIR was circulated. The NOA informed responsible and trustee agencies and the public of the review period and where to find the document. The NOA also invited agencies and the public to submit written comments on the information contained in the document and to attend one of two public meetings held on the proposed project. The NOA was mailed to interested public agencies, owners and tenants of properties within 1,000 feet of the project site and those agencies and individuals who either attended the public scoping meeting on the Subsequent Draft EIR held on January 10, 2013 or submitted comment letters in response to the Notice of Preparation of the Subsequent Draft EIR issued December 14, 2012. Additionally, the NOA was published in local newspapers; the LA Opinion and Los Angeles Sentinel on January 23, 2014.

2.2 PUBLIC MEETING COMMENTS

Public meetings were held on February 5, 2014 and February 19, 2014 at the South Gate Educational Center to inform interested individuals of the findings of the Subsequent Draft EIR. Verbal questions and comments were received during the public meetings and responses were provided as appropriate. Attendees were encouraged to submit their comments in writing; however, no written comments were received from attendees. The verbal comments received at the public meetings were not directed towards the content or findings of the Subsequent Draft EIR. However, concerns were expressed regarding potential construction traffic impacts, hazardous conditions associated with the existing buildings, the demolition of historic structures, and air quality impacts associated with the scrap metal facility located northwest of the project site.

The commenters were informed that during construction, signage would be provided along roadways to reduce potential construction traffic impacts, as necessary. Regarding hazardous conditions associated with existing buildings, the new Firestone Education Center would be housed in a newly constructed building, and therefore, would not occupy any existing buildings. Further, mitigation measures have been identified in Section 4.6 Hazards and Hazardous Materials of the Subsequent Draft EIR to reduce potential impacts related to hazardous materials to less-than-significant levels. With regard to the demolition of historic resources, it was explained to the commenters that Building 4 would be demolished as part of the proposed project. However, while Building 4 was identified as a contributor to the California Register-eligible South Gate Historic District, it was determined not to be individually eligible for listing on the California Register. Buildings 1, 2, and 3, all of which are individually eligible for listing on the California Register, would remain under the proposed project. These buildings would continue to be dominant visual features on the project site. The historic character of the
project site would be retained, and mitigation measures have been identified in Section 4.3 Cultural Resources of the Subsequent Draft EIR to reduce significant impacts related to historical resources to the maximum extent feasible.

Concerns related to air quality emissions associated with the scrap metal facility were first brought up at the Subsequent Draft EIR Scoping Meeting held January 10, 2013. Individuals expressed concern that the scrap metal recycling facility may be operating beyond its permitted capacity, and there was concern related to pollutant exposure and potential adverse health effects. The approximately 2.9-acre metal recycling site is located at 8440 S. Alameda Street, approximately 1,000 feet northwest of the project site. According to South Coast Air Quality Management District (SCAQMD) records, this facility generates criteria pollutants along with 0.029 tons per year of nickel, which has been identified by the State Office of Environmental Health Hazard Assessment as a toxic air contaminant.

A commenter suggested that a Health Risk Assessment (HRA) be prepared for the proposed project. However, CEQA does not require the preparation of HRAs for projects. California law provides that the impact of the existing environment on a potential project is outside the purview of CEQA, and that CEQA documents must address the impact of the project on the existing environment, not vice versa. While LACCD has prepared HRAs for various other projects within the district, these HRAs were prepared at the request of the SCAQMD because the projects included programs or facilities that may house pre-school, primary or secondary school age children on LACCD campuses or properties. No such facilities are planned as part of the proposed project. The basis for this consideration has been State Education Code Section 17213 that requires disclosure for this age range of students. In this instance, while the Notice of Availability (NOA) was provided to the SCAQMD, no request for an HRA has been received from the SCAQMD for the proposed project.

2.3 WRITTEN COMMENTS

During the review period, 12 written comment letters on the Subsequent Draft EIR were received. Each comment letter has been assigned a number. The body of each comment letter has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comment letters are included in their entirety, followed by the corresponding responses which include a brief summary of comment. Corrections and additions to the Subsequent Draft EIR are provided in underline or strikeout text as needed to indicate an addition or deletion, respectively.

The following presents a list of all persons or organizations who submitted written comments on the Subsequent Draft EIR:

1. State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit
2. State of California, Native American Heritage Commission (NAHC)
3. State of California, Department of Transportation (Caltrans)
4. State of California, Public Utilities Commission (CPUC)
5. County of Los Angeles Fire Department (LACFD)
6. Los Angeles County Metropolitan Transportation Authority (Metro)
7. County Sanitation Districts of Los Angeles County (LACSD)
8. County of Los Angeles Department of Public Works (LACDPW)
9. City of South Gate, Public Works Field Operations
10. Alfanzo Alacron
11. Luisa Alonso
12. Jose Luis Alonso
March 4, 2014

Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan
SCH#: 2010121044

Dear Thomas Hall:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 3, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street  P.O. Box 3044  Sacramento, California 95812-3044
(916) 445-0613  FAX (916) 323-3018  www.opr.ca.gov
March 10, 2014

Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan
SCH#: 2010121044

Dear Thomas Hall:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 3, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2010121044) when contacting this office.

Sincerely,

[Signature]

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency
March 14, 2014

Thomas Hall  
Los Angeles Community College District  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan  
SCH#: 2010121044

Dear Thomas Hall:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 3, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2010121044) when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency
Document Details Report
State Clearinghouse Data Base

SCH# 2010121044
Project Title 2013 Firestone Education Center Master Plan
Lead Agency Los Angeles Community College District

Type EIR Draft EIR
Description The proposed project consists of the construction and operation of a new LACCD satellite community college campus that would replace the existing South Gate Education Center and accommodate up to 9,000 students. The proposed project includes the demolition of a 220,550 sf building and its connections to the adjacent building, and the construction of a new approximately 100,000 gsf building and a 1,600-space parking structure. The project site would also be improved with a surface parking lot, landscaping, an open space area, and other outdoor amenities. Vehicular access and circulation improvements would be implemented on- and off-site and new traffic signals would be installed at the existing Firestone Boulevard driveway and the proposed Santa Fe Avenue driveway opposite Ardmore Avenue.

Lead Agency Contact
Name Thomas Hall
Agency Los Angeles Community College District
Phone 213 891 2119 Fax
email
Address 770 Wilshire Boulevard, 6th Floor
City Los Angeles State CA Zip 90017

Project Location
County Los Angeles
City South Gate
Region
Lat/Long 33° 57' 32" N / 118° 13' 14" W
Cross Streets Santa Fe Avenue/Firestone Blvd.
Parcel No. 6204-034-002
Township 3S Range 12W Section Base

Proximity to:
Highways I-105
Airports No
Railways UPRR
Waterways No
Schools SGHS, Stanford ES, etc.
Land Use Z: Heavy Manufacturing
GP: Mixed Commercial/Industrial, Subarea 1 South Gate College District

Project Issues Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Minerals; Recreation/Parks; Septic System; Vegetation; Wellland/Riparian; Other Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

Date Received 01/17/2014 Start of Review 01/17/2014 End of Review 03/03/2014
LETTER 1

March 3, 2014

State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

Response 1-1

This comment letter acknowledges that the proposed project has complied with State Clearinghouse review requirements for draft environmental documents. The second and third comment letters from the State Clearinghouse indicates that the California Department of Transportation (Caltrans) and California Public Utilities Commission (CPUC) submitted a comment letter after the end of the review period and encourages LACCD to respond to it, even though CEQA does not require Lead Agencies to respond to late comments.

A list of State agencies that reviewed the document and comments from responding agencies were enclosed. Comments from responding agencies were limited to the Native American Heritage Commission (NAHC), Caltrans, and the CPUC. Responses to these comment letters are provided as Letters 2, 3, and 4, respectively.
Mr. Thomas Hall  
Los Angeles Community College District (LACCD)  
770 Wilsfue Boulevard, 6th Floor  
Los Angeles, CA 90017  

RE: SCH#2010121044 CEQA Notice of Notice of Completion; Subsequent Environmental Impact Report (SEIR)2013 n for the “Firestone Education Center Master Plan Project,” located in the South Gate Area; Los Angeles County, California  

Dear Mr. Hall:  

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.  

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:  

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).  

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any 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 pursuant to California Government Code Section 0254.10.
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse
Attachment: Native American Contacts list
Native American Contacts
Los Angeles County California
February 3, 2014

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielo Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417 - fax

Gabrielo Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address
Gabrielo Tongva
tattnlaw@gmail.com
310-570-6567

Gabrielo Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
GTTRibalcouncil@aol.com
(626) 286-1232 - FAX
(626) 286-1758 - Home
(626) 286-1622 - FAX

Gabrielo Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180
Bonsall, CA 92003
(619) 294-6660 - work
(310) 428-5690 - cell
(760) 636-0854 - FAX
bacuna1@gabrielotriben狴em.org

Gabrielo Tongva Nation
Sandrone Goad, Chairperson
P.O. Box 86908
Los Angeles, CA 90066
sgoad@gabrielotongva.com
951-845-0443

Gabrielo Band of Mission Indians
Andrew Sillas, Chairperson
P.O. Box 393
Covina, CA 91723
gabrielenoindians@yahoo.com
(626) 926-4131

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010171044; CEQA Notice of Completion; draft Subsequent Environmental Impact Report (SEIR) for the Firestone Education Center Master Plan; located in the South Gate area; Los Angeles County, California.
Native American Contacts
Los Angeles County California
February 3, 2014

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180
Bonsall, CA 92003

Gabrielino

760-636-0854 - FAX

Gabrielino/Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908
Los Angeles, CA 90086
samdunlap@earthlink.net
909-262-9351

PeuYoKo Perez
11465 Nardo Street
Ventura, CA 93004

Chumash
gmctw44@yahoo.com
805-231-0229 cell

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7095.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010121044; CEQA Notice of Completion; draft Subsequent Environmental Impact Report (SEIR) for the Firestone Education Center Master Plan; located in the South Gate area; Los Angeles County, California.
LETTER 2

February 3, 2014

State of California
Native American Heritage Commission
Dave Singleton, Program Analyst
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691

Response 2-1

This comment includes recommendations for compliance with the provisions of CEQA and ways mitigate project-related impacts on archaeological resources. As discussed in Section 4.3 Cultural Resources of the Subsequent Draft EIR, a cultural resources record check conducted for the project site concluded that there are no archaeological sites located within the project area. The records, literature search, and surveys revealed a low sensitivity for historic-period and prehistoric archaeological resources in the project area. Additionally, the NAHC was consulted as a means of determining the presence of Native American resources on the project site. A record search of the sacred lands file was conducted by the NAHC, and it did not indicate the presence of Native American cultural resources in the immediate project area. Regardless, because there is always a possibility that archaeological resources or human remains could be encountered during earth moving activities, Mitigation Measures CR3 and CR6 have been identified. These mitigation measures establish protocols in the event that archaeological resources or human remains are discovered during ground-disturbing activities. The identified mitigation measures are consistent with the recommendations in this comment letter.
March 6, 2014

Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Re: Firestone Education Center Mater Plan
Draft Environmental Impact Report (DEIR)
SCH#2010121044, IGR No: 140134/E
Vic: LA / 710 / PM 18.314

Dear Mr. Hall

The California Department of Transportation (Caltrans) has reviewed the transportation/traffic section of subsequent DEIR dated January 2014 for the proposed Firestone Education Center Mater Plan. The proposed project consists of the construction and operation of a new education center that would replace the existing South Gate Education Center to accommodate up to 9000 students. The proposed project includes demolition of existing building 4 and construction of a new parking structure to provide approximately 1,600 parking spaces. The project site is located on the northwest quadrant of the Firestone Boulevard and Santa Fe Avenue in the City of South Gate.

Based on a review of the Transportation/Traffic section included in the DEIR, Caltrans has the following comments:

Table 4.12-9 shows that the proposed project would generate a net increase of approximately 2780 daily vehicle trips with 289 occurring in the AM Peak Hour and 224 in the PM peak hour. According to the proposed project’s vehicle trip assignments in Figure 4.12-5, a net increment of 30 vehicles are assigned to I-710 southbound off-ramp to Firestone Boulevard during the AM peak hour and 14 during the PM peak hour. Table 4.12-11 shows that the I-710 southbound and northbound off-ramps to Firestone Boulevard are projected to deteriorate from level of service D and E in the existing 2012 scenario to level of service E and F in the 2031 with project scenario. Caltrans requests that mitigation improvements be included to address anticipated cumulative transportation impacts at this location. The proposed project may contribute to the funding of those improvements proportionally with its impacts.

The Traffic Impact Analysis (TIA) does not analyze the storage capacity for left turn pockets at on-ramps and at off-ramps to and from I-710 in either direction at Firestone Boulevard. Caltrans requests that the TIA evaluate whether existing storage capacity at these locations is adequate to accommodate projected cumulative traffic demand. Please include mitigation improvements if the current storage capacity is projected to be exceeded. Please follow Highway Capacity Manual methodology of queuing analysis.

“Caltrans improves mobility across California”
Mr. Thomas Hall  
March 6, 2014  
Page 2 of 2

The TIA states that the proposed project does not assign 150 vehicle trips to I-710 and therefore according to the Los Angeles Congestion Management Program, no analysis is required. Thus, the TIA does not provide information as to current and future operations of I-710. Metro and Caltrans along with the ports and other local organization are planning to improve the I-710 Corridor from Ocean Boulevard to SR-60 to address current and projected traffic congestion. Comprehensive Improvements are planned to the Firestone Boulevard interchange as part of the I-710 Corridor; however they are still in the planning stage. Caltrans recommends the following interim improvements at this location: Modify signals at ramps, install bicycle detection, and upgrade ramps to meet latest requirements of the Americans with Disabilities Act (ADA). Caltrans requests early coordination of any mitigation improvements on State highway facilities, as they would require an encroachment permit from it.

Caltrans acknowledges and agrees with the proposed Transportation Demand Management (TDM) program (TT4). The TDM program includes the following elements: (a) internet-based and independent study classes which allow for a portion or all of the education activities to occur without students and faculty needing to be physically on-site, (b) East Los Angeles College (ELAC) plans to offer free or discounted public transit coordination with various transit providers for all students and staff, and (c) In cooperation with other transit agencies and the City of South Gate, ELAC shall seek to improve existing bus stops with enhanced shelters and transit information with the immediate vicinity of the Firestone Education Center campus. Caltrans requests the City and District monitor the success of the TDM program and resultant effects to the freeway system.

Finally, we note that construction may involve the transportation of contaminated soils. Please require the project obtain required transportation permits for hauling excavated contaminated soils.

If you have any questions regarding our comments, you may contact me or Elmer Alvarez, project coordinator at (213) 897 – 6696 or electronically at Elmer_Alvarez@dot.ca.gov. Please refer to record number 140134/EA.

Sincerely,

DIANNA WATSON  
IGR/CEQA Branch Chief  
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

“Caltrans improves mobility across California”
LETTER 3

March 6, 2014

State of California
Department of Transportation
Dianna Watson, IGR/CEQA Branch Chief
District 7, Office of Transportation Planning
IGR/CEQA Branch
100 Main Street, MS # 16
Los Angeles, CA 90017

Response 3-1

This comment contains introductory remarks, and no response is necessary.

Response 3-2

As discussed in Section 4.12 Transportation and Traffic of the Subsequent Draft EIR, the cumulative transportation impacts at the I-710 Freeway Southbound and Northbound Off-Ramps to Firestone Boulevard, referred to in this comment, were analyzed (Intersection No. 30: I-710 Freeway Southbound Ramps/Firestone Boulevard and Intersection No. 31: I-710 Freeway Northbound Ramps/Firestone Boulevard). These intersections are located within the City of South Gate, and as such the City’s adopted significant impact threshold criteria were employed in the traffic analysis. The traffic study analyzed future cumulative conditions without the project (i.e., Year 2031 Without Project scenario, which includes ambient traffic growth and traffic that could be generated by the related projects) and with the project (i.e., Year 2031 With Project scenario, which includes ambient traffic growth, traffic that could be generated by the related projects and the proposed project). It was concluded that the proposed project’s contribution to the cumulative conditions at these intersections would be less than significant. The City of South Gate only requires the mitigation of transportation impacts when traffic generated by a project results in an increase in the volume-to-capacity (V/C) ratio equal to or greater than 0.02 for level of service (LOS) E or F. Therefore, while the LOS at these locations would deteriorate incrementally, as noted in the comment, no significant transportation impact would occur. Specifically, traffic generated from the proposed project would result in a V/C ratio increase of 0.011 and 0.005 at the I-710 Freeway Southbound Off-Ramp to Firestone Boulevard in the AM and PM peak hours, respectively. Similarly, at the I-710 Northbound Off-Ramp to Firestone Boulevard, the V/C ratio would increase 0.002 and 0.001 in the AM and PM peak hours, respectively. These increases in V/C ratio are not considered significant as they remain below the City’s impact threshold criterion of an increase in the V/C ratio of 0.02 or greater at LOS E or F operations.

The comment also acknowledges that Los Angeles County Metropolitan Transportation Authority (Metro) is currently preparing the I-710 Corridor Project EIR/EIS in coordination with California Department of Transportation (Caltrans), the ports and other local organizations. The purpose of the project is to address current and future (Year 2035) operating conditions and congestion along the I-710 Freeway from Ocean Boulevard to SR-60. It is important to note that this study already reports deficient existing operating conditions at both the I-710 Freeway Southbound and Northbound Ramp intersections. Both of these ramp intersections were shown to be operating at LOS E during the PM peak hour. The environmental review process is underway for the corridor project and several improvement alternatives have also been identified that are expected to improve operations to an acceptable LOS (LOS D or better). The Metro study also has taken into account cumulative (Year 2035) traffic conditions which are based on the corresponding socio-economic forecasts and regional modeling efforts.

Therefore, as the proposed project would not result in a cumulatively considerable transportation impact, the request for mitigation measures at these already deficient ramp intersections is not warranted.
Response 3-3

This comment requests an evaluation of the existing storage for left-turn pockets at on-ramps and off-ramps to and from the I-710 Freeway at Firestone Boulevard in order to determine if the available storage is adequate to accommodate the projected cumulative traffic demand. The comment suggests that mitigation improvements be identified if capacity is projected to be exceeded and recommends the analysis follow the Highway Capacity Manual (HCM) methodology for queuing analyses. As shown in Figure 4.12-5 of the Subsequent Draft EIR, the proposed project is not expected to result in any left-turn traffic movements at the I-710 Freeway Southbound Off-Ramp at Firestone Boulevard due to the fact that the proposed project is located between 2.5 and 3 miles west of the I-710 Freeway. The proposed project, however, is expected to nominally increase the left-turn volume at the I-710 Freeway Northbound Off-Ramp at Firestone Boulevard (i.e., an increase of two vehicles during both the AM and PM peak hours). In addition, there are no left-turn traffic movements to access either the Northbound or Southbound I-710 Freeway On-Ramps from Firestone Boulevard, as entering freeway volumes are accommodated via right-turn (i.e., non-critical) turning movements.

In response to this comment, a supplemental freeway ramp queuing analysis has been prepared for the I-710 Freeway Northbound and Southbound Off-ramps corresponding to the Year 2031 cumulative conditions. The queuing analyses, which are based on the HCM signalized methodology, were prepared to determine if the forecasted AM and PM peak hour traffic volumes exiting the I-710 Freeway at these two study intersections would queue back into the freeway mainline travel lanes. Table 2-1 includes the results of this queuing analysis, and shows that adequate storage is provided for the Year 2031 cumulative traffic conditions at both the I-710 Freeway Southbound and Northbound Off-Ramps at Firestone Boulevard during the AM and PM peak hours, as approximately 2,850 feet and 2,520 feet of total storage is currently provided, respectively (as measured from the freeway gore area to the respective off-ramp approach limit lines at Firestone Boulevard).

<table>
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<th>PM Peak Hour</th>
<th>Adequate Storage (Yes/No)</th>
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<tr>
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<td>Maximum Queue (Feet)/a/</td>
<td>Adequate Storage (Yes/No)</td>
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</tbody>
</table>

**SB:** Southbound  **NB:** Northbound

Intersection queuing analysis based on the Highway Capacity Software (HCS).

(a) An average vehicle length of 25 feet is utilized.

Source: Linscott, Law & Greenspan, Engineers, Vehicle Queuing Analysis, 2013 Firestone Education Center, March 19, 2014. Refer to Subsequent Final EIR Appendix A.

As discussed in Response 3-2 above, the analysis of cumulative transportation impacts determined that, while the level of service at these intersections could be expected to continue to be deficient in the future, the proposed project’s contribution to transportation impacts at these intersections would not be cumulatively considerable and would be less than significant. Therefore, based on results of the supplemental freeway ramp queuing analysis (which concluded that adequate ramp storage exists to accommodate Year 2031 cumulative traffic volumes), the determination of no significant project-related traffic impacts and in light of
the regional Metro/Caltrans I-710 Corridor Project EIR/EIS study currently underway, the request for mitigation measures is not warranted.

**Response 3-4**

As noted in the comment, the Los Angeles Congestion Management Program (CMP) guidelines only require that freeway monitoring locations to be examined if a project adds 150 or more trips (in either direction) during either the weekday AM or PM peak hours. The proposed project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to the CMP freeway monitoring locations. The proposed project would only result in a net increment of 30 vehicles assigned to the I-710 Freeway Southbound Off-Ramp to Firestone Boulevard during the AM peak hour and 18 vehicles during the PM peak hour (via right-turns). Please refer to Responses 3-2 and 3-3 for further discussion of the supplemental ramp queuing analyses that have been prepared as part of this Subsequent Final EIR and the conclusion that adequate ramp storage exists to accommodate the forecast Year 2031 cumulative AM and PM peak hour traffic volumes. As the proposed project would not result in a cumulatively considerable transportation impact, the request for mitigation measures interim or otherwise is not warranted.

**Response 3-5**

This comment concurs with the Transportation Demand Management (TDM) program mitigation measure identified in the Subsequent Draft EIR and requests that LACCD monitor the success of the program and resultant effects to the freeway system. LACCD intends to implement a TDM program and will monitor the effectiveness of the various measures identified to decrease the number of vehicular trips generated by persons traveling to and from the project site.

**Response 3-6**

This comment contains closing remarks and states that if construction activities involve the transportation of contaminated soils, LACCD shall obtain the necessary transportation permits. In the event that construction requires the removal of contaminated soil from the project site, a mitigation measure has been included that requires LACCD to coordinate with California Department of Toxic Substances Control (DTSC), and any required transportation permits would be obtained.
March 13, 2014

Mr. Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, California 90017

Dear Mr. Hall:

Re: SCH 2010121044, LACCD 2013 Firestone Education Center Master Plan, SEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. The Commission’s Rail Crossings Engineering Section (RCES) is in receipt of the Draft Supplemental Environmental Impact Report (SEIR) for the proposed Los Angeles Community College District (LACCD) 2013 Firestone Education Center Master Plan project from the State Clearinghouse.

According to the SEIR, the project consists of construction and operation of a new LACCD satellite community college campus for up to 9,000 students. A new parking structure would be constructed in the northeast corner of the site and new traffic signals would be installed at the proposed Santa Fe Avenue driveway opposite Ardmore Avenue. The site is bounded by the Union Pacific Railroad Company (UPRR) rail track on the north, Santa Fe Avenue on the east and Firestone Boulevard on the south. Across Santa Fe Avenue from the site, Ardmore Avenue is immediately south of the UPRR right of way (ROW). The Santa Fe Avenue crossing (CPUC No. 001BK-489.60 and DOT No. 748086F) is adjacent to the northeast corner of the site.

Any development adjacent to or near the shared railroad/light rail right-of-way should be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. Language should be in place so that any traffic impact studies undertaken should also address rail crossing safety analysis and associated proposed mitigation measures. Safety analysis should include queuing on tracks, pedestrian movements, turning movements and sightlines. Additional safety improvement measures may include the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes (e.g., addition or upgrade of crossing warning devices, active and passive signs, and channelization fencing).

As part of the project, RCES recommends at a minimum the following safety improvements at the project site and the Santa Fe Avenue crossing:
• Install continuous vandal resistant fencing (or other appropriate barriers) on the project area bordering the UPRR rail track to prevent unauthorized entry into the railroad ROW and to minimize the potential noise impact caused by the train horns and traffics;

• Install sidewalk passages at the crossing;

• Install traffic system preemption for the crossing and Ardmore Avenue;

• Install Americans with Disabilities Act (ADA) compliant standard detectable warning tactile strips on all pedestrian approaches to the crossing, either 12 feet away from the track or two (2) feet away from the Commission Standard 9 warning devices, whichever is further away from the track; and

• Install two (2) edge-line stripes for each sidewalk passage at the crossing.

In addition, any modification to the existing crossing requires authorization from the Commission. RCES representatives are available for consultation on any potential safety impacts or concerns on the adjacent or nearby crossing. The LACCD shall also arrange a diagnostic meeting with Los Angeles County Public Works Department, UPRR and RCES staff to discuss relevant safety issues and requirements for authorization to alter the existing at-grade crossing as necessary. Please continue to keep RCES informed of the project’s development. More information can be found at: http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/index.htm.

If you have any questions, please contact Ken Chiang at 213-576-7076, email at ykc@cpuc.ca.gov, or Jose Pereyra at (213) 576-7083, email jose.pereyra@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

CC: State Clearinghouse
LETTER 4

March 13, 2014

State of California
Public Utilities Commission
Ken Chiang, P.E., Utilities Engineer
Rail Crossings Engineering Section, Safety and Enforcement Division
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Response 4-1

This comment contains introductory remarks and states that the CPUC requires approval for the design, construction and alteration of rail crossings. The comment further indicates that the project site is located adjacent to the Union Pacific Railroad Company (UPRR) Santa Fe Avenue rail crossing. No response to this comment is necessary.

Response 4-2

This comment states that any development located adjacent to or near shared railroad/light rail right-of-way should be planned with the safety of the rail corridor in mind and identifies recommended improvements for the Santa Fe Avenue crossing. As mentioned above, the Santa Fe Avenue crossing is adjacent to the northeast corner of the project site, and Ardmore Avenue is immediately south of the UPRR right-of-way. Mitigation Measure TT1 requires LACCD to install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage at the intersection of Ardmore and Santa Fe Avenues. The outbound (i.e., exiting Firestone Education Center (FEC) traffic) travel lanes would be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists would be provided. With the two inbound lanes proposed at this driveway, vehicular queuing back out onto Santa Fe Avenue towards the UPRR right-of-way (i.e., north of the driveway) is not anticipated. Furthermore, it is anticipated that the majority of project traffic utilizing the proposed driveway on Santa Fe Avenue will originate from and be destined to the south, based on a detailed review of the existing South Gate Education Center student population zip code data and the locations of surrounding major traffic corridors. Nonetheless, when the formal signal design process is initiated, the necessary coordination with the CPUC and/or UPRR will occur, and it is acknowledged that the following safety improvements may be incorporated into the design:

- Install continuous vandal resistant fencing (or other appropriate barriers) on the project area bordering the UPRR rail track to prevent unauthorized entry into the railroad right-of-way and to minimize the potential noise impact caused by the train horns and traffics;
- Install sidewalk passages at the crossing;
- Install traffic system preemption for the crossing and Ardmore Avenue;
- Install Americans with Disabilities Act (ADA) compliant standard detectable warning tactile strips on all pedestrian approaches to the crossing, either 12 feet away from the track or two feet away from the Commission Standard 9 warning devices, whichever is further away from the track; and
- Install two edge-line stripes for each sidewalk passage at the crossing.

Response 4-3

This comment reiterates that any modifications to the existing crossing requires authorization from the CPUC and suggests that LACCD arrange a diagnostic meeting with the Los Angeles County Public Work Department and UPRR and CPUC staff to discuss relevant safety issues and requirements. As discussed above, when the formal signal design process is initiated, the necessary coordination will occur and safety improvements will be discussed and addressed as part of the traffic signal pre-design coordination effort.
February 13, 2014

Thomas Hall, Director  
Los Angeles Community College District  
Facilities Planning and Development  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017  

Dear Mr. Hall:

SUBSEQUENT DRAFT ENVIRONMENTAL IMPACT REPORT, "THE 2013 FIRESTONE EDUCATION CENTER MASTER PLAN," IT CONSISTS IF THE CONSTRUCTION AND OPERATION OF A NEW LOS ANGELES COMMUNITY COLLEGE DISTRICT SATELLITE CAMPUS, 2525 FIRESTONE BOULEVARD, SOUTH GATE (FFER #201400014)

The Subsequent Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

**PLANNING DIVISION:**

4.11 PUBLIC SERVICES

Table 4.11-2: EQUIPMENT AND STAFFING OF FIRE STATIONS SERVING THE PROJECT SITE

The staffing on the two-person paramedic squad at Fire Station 54 should be corrected two fire fighter paramedics only.

Paragraphs 3, 4 and 5 should be corrected/updated as follows:

Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2013, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-
emergency response time of approximately 4:43 minutes and 7:30 minutes, respectively. Station 16 responded to 3,924 incidents during that time period, of which, 85 were fire related, 3,312 were emergency medical incidents, and 527 were other types.

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southwest southeast of the project site. In 2013, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:10 minutes and 5:44 minutes, respectively. Fire Station 147 responded to 2,849 incidents during that time period, of which, 49 were fire related, 2,462 were emergency medical incidents, and 338 were other types.

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2013, Fire Station 54 met the LACFD response time guidelines with an average emergency and nonemergency response time of approximately 4:59 minutes and 6:48 minutes, respectively. Fire Station 54 responded to 2,942 incidents during that time period, of which, 96 were fire related, 2,559 were emergency medical incidents, and 287 were other types.

**LAND DEVELOPMENT UNIT:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

4. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.
The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration, as outlined in the 2012 County of Los Angeles Fire Code, Appendix B, Table BB105.1. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.

Fire hydrant spacing shall be based on fire flow requirements, as outlined in the 2002 County of Los Angeles Fire Code Appendix III-BB. Additional hydrants will be required if hydrant spacing exceeds specified distances.

Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.

Driveway width for non-residential developments shall be increased when any of the following conditions will exist:

- Provide 34 feet in-width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
- Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway.
- Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map, and final building plans.
- For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

Notify the County of Los Angeles Fire Department, Fire Stations 16: (323) 585-5002, FS147: (310) 603-5255, and FS 54: (323) 567-8580, at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

The County of Los Angeles Fire Department, Land Development Unit's comments are only general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
13. Submit three sets of water plans to the County of Los Angeles Fire Department, Land Development Unit. The plans must show all proposed changes to the fire protection water system, such as fire hydrant locations and main sizes. The plans shall be submitted through the local water company.

14. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or at nrodeheffer@fire.lacounty.gov.

15. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division, have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The project site formerly Firestone Tire and Rubber Plan is under oversight of the Department of Toxic Substances Control (DTSC) for mitigation of soil and groundwater contamination. Approval of DTSC is required prior to disturbance and grading of the soils.

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

Very truly yours,

FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl
LETTER 5

February 13, 2014

County of Los Angeles Fire Department
Frank Vidalez, Chief, Forestry Division, Prevention Services Bureau
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Response 5-1

As requested in this comment the following text on page 4.11-3 of the Subsequent Draft EIR has been revised:

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<tr>
<td></td>
<td>Three-Person Engine</td>
<td>1 Captain, 1 Firefighter Specialist, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>2 Firefighter Paramedics</td>
</tr>
<tr>
<td>Fire Station 147</td>
<td>Four-Person Quint /a/</td>
<td>1 Captain, 1 Firefighter Specialist, 1 Firefighter Paramedic, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>2 Firefighter Paramedics</td>
</tr>
<tr>
<td>Fire Station 54</td>
<td>Four-Person Engine</td>
<td>1 Captain, 1 Firefighter Specialist, 1 Firefighter Paramedic, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>1 Captain, 1 Firefighter Specialist, 1 Firefighter Paramedic, 1 Firefighter</td>
</tr>
</tbody>
</table>

/a/ A quint is a combination engine/ladder truck apparatus.

SOURCE: Los Angeles County Fire Department, Planning Division, email correspondence with Loretta Bagwell, Planning Analyst, January 31, 2013 and written comments on the Subsequent Draft Environmental Report for the 2013 Firestone Education Center Master Plan from Frank Vidalez, Chief, Forestry Division, Prevention Services Bureau. February 13, 2014.

Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2012-2013, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:38 4:43 minutes and 5:36 7:30 minutes, respectively. Fire Station 16 responded to 3,782 3,924 incidents during that time period, of which, 80 85 were fire related, 3,164 3,312 were emergency medical incidents, and 538 527 were other types.4

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southwest of the project site. In 2012-2013, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:07 4:10 minutes and 5:10 5:44 minutes, respectively. Fire Station 147 responded to 2,849 2,586 2,462 incidents during that time period, of which, 78 49 were fire related, 2,586 2,462 were emergency medical incidents, and 491 338 were other types.5

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2012, Fire Station 54 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 5:03 4:59 minutes and 6:25 6:48 minutes, respectively. Fire Station 54 responded to 2,942 3,037 2,942 incidents during that time period, of...
which, 10396 were fire related, 25872559 were emergency medical incidents, and 347287 were other types.6

Response 5-2

The Los Angeles County Fire Department (LACFD) Land Development Unit identifies general fire and life safety requirements that may be applicable to the proposed project in this comment. The proposed project would be required to comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. As stated in this comment, specific fire and life safety requirements set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Additional requirements may be identified once the official plans are submitted for review. As called for in this comment, three sets of the project’s water plans that identify all proposed changes to the fire protection water system shall be submitted through the local water company to the LACFD, Land Development Unit.

Response 5-3

This comment expresses that all areas germane to the statutory responsibilities of the LACFD, Forestry Division have been addressed in the Subsequent Draft EIR.

Response 5-4

The LACFD Health Hazardous Materials Division states that approval of the Department of Toxic Substances and Control (DTSC) is required prior to disturbance and grading of soils at the project site. As discussed on page 4.6-6 of the Subsequent Draft EIR, DTSC issued a “No Further Action” letter deeming the project site suitable for unrestricted use on September 3, 2009. Although a “No Further Action” letter was issued for the project site, in January 2013, LACCD entered into a Voluntary Cleanup Agreement with the DTSC pursuant to the California Health and Safety Code which authorizes DTSC to oversee the investigation and remediation of the release or threatened release of any hazardous substances at or from the project site. Approval of the DTSC prior to disturbance and grading of soil will be obtained.

3Ibid.
February 24, 2013

Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

RE: Firestone Education Center Master Plan

Dear Mr. Hall:

Thank you for the opportunity to comment on the proposed Firestone Education Center Master Plan at 2525 Firestone Boulevard. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues in relation to the proposed project that are germane to our agency’s statutory responsibility as well as our facilities and services.

Our agency submitted a letter at the time of the Notice of Preparation (NOP), which detailed the State requirements for Congestion Management Program (CMP) analysis. We appreciate the careful analysis that has been performed in the Draft EIR.

In addition, it is noted that Metro bus lines operate on Firestone Boulevard and Santa Fe Avenue, adjacent to the proposed project. Two Metro bus stops are directly adjacent to the proposed project. The following comments relate to bus operations and the bus stop:

1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stops must be maintained as part of the final project.

2. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may Impact Metro bus lines. (For closures that last more than six months, Metro’s Stops and Zones Department will also need to be notified at 213-922-5190). Other municipal bus may also be impacted and should be included in construction outreach efforts.

3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Final design of the bus stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
LACMTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. Please send the Final EIR to the following address:

LACMTA Development Review  
One Gateway Plaza MS 99-23-4  
Los Angeles, CA 90012-2952

Sincerely,

Nick Saponara  
Development Review Manager, Countywide Planning
LETTER 6

February 24, 2014

Los Angeles County Metropolitan Transportation Authority
Nick Saponara, Development Review Manager, Countywide Planning
One Gateway Plaza
Los Angeles, CA 90012-2952

Response 6-1

This comment contains introductory remarks, and Metro expresses their appreciation of the congestion management program (CMP) analysis conducted as part the Subsequent Draft EIR. No response is necessary.

Response 6-2

This comment relates to Metro bus operations and bus stops. Two Metro bus stops are located directly adjacent to the project site. The existing westbound bus stop on Firestone Boulevard just west of Santa Fe Avenue would not be affected by either construction or operation of the proposed project. However, the southbound Santa Fe Avenue bus stop would be temporarily relocated during construction and permanently relocated prior to operation of the FEC. Additionally, Mitigation Measure TT3, which is necessary to mitigate impacts to the intersection of Firestone Boulevard and Santa Fe Avenue, calls for the relocation of the existing eastbound Firestone Boulevard bus stop just west of Santa Fe Avenue to be located just east of Santa Fe Avenue. Prior to construction of the proposed project, LACCD will coordinate with Metro regarding the relocation and design of these bus stops and approval would be obtained. Bus stops and routes would be maintained during both construction and operation of the proposed project. The final design of the bus stops and surrounding sidewalk area would be compliant with the American Disabilities Act and allow passengers with disabilities a clear path of travel to the bus stop from the FEC.

Response 6-3

This comment solicits questions on the commenter letter and requests that the Subsequent Final EIR be sent to Metro for review. No response is necessary.
March 3, 2014

Ref File No.: 2852090

Mr. Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Dear Mr. Hall:

2013 Firestone Education Center Master Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Subsequent Draft Environmental Impact Report for the subject project on January 17, 2014. The proposed development is located within the jurisdictional boundaries of District No. 1. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated January 10, 2013 (copy enclosed) still apply to the subject project with the following updated information.

2. The 18-inch diameter Mountain View-Belle Vernon Relief Extension Trunk Sewer conveyed a peak flow of 0.2 million gallons per day (mgd) in 2013.

3. The Joint Water Pollution Control Plant currently processes an average flow of 263.2 mgd.

4. The expected increase in average wastewater flow from the project site is 174,486 gallons per day.

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

Very truly yours,

Grace Robinson Hyde

7-1

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: M. Tremblay
    J. Ganz

DOC: #2908961.D01
January 10, 2013

Ref. File No: 2442094

Mr. Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Dear Mr. Hall:

The Revised Firestone Education Center Master Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on December 14, 2012. The proposed development is located within the jurisdictional boundaries of District No. 1. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts' Mountain View-Belle Vernon Relief Extension Trunk Sewer, located in Truva Avenue at Missouri Avenue. This 18-inch diameter trunk sewer has a design capacity of 1.7 million gallons per day (mgd) and conveyed a peak flow of 1.3 mgd when last measured in 2009.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 265.7 mgd.

3. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. 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 a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design 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 CAA. 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you 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,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: M. Tremblay
   J. Ganz
LETTER 7

March 3, 2014

County Sanitation Districts of Los Angeles County
Adriana Raza, Customer Service Specialist, Facilities Planning Department
1955 Workman Mill Road
Whittier, CA 90601-1400

Response 7-1

This comment letter clarifies that previous comments submitted by the LACSD still apply to the proposed project with identified updates. In response to this comment, the following text in Section 4.13 Utilities and Service Systems, Wastewater of the Subsequent Draft EIR has been revised.

- Subsequent Draft EIR page 4.13-9, Wastewater Treatment heading, fourth sentence:
  
The JWPCP has a design capacity of 400 million gpd and provides both primary and secondary treatment for approximately currently processes an average flow of 275 263.2 million gpd of wastewater.

- Subsequent Draft EIR page 4.13-9, Wastewater Conveyance Infrastructure heading, last sentence:
  
The Mountain View-Belle Vernon Relief Extension Trunk Sewer is an 18-inch pipe with a design capacity of 1.9 million gpd and conveyed a peak flow of 4.3 0.2 million gpd in 2009 2013.

- Subsequent Draft EIR page 4.13-11, Wastewater Treatment heading, last sentence and Table 4.13-7:
  
As shown in Table 4.13-7, the proposed project is estimated to increase wastewater generation by 180,000 approximately 175,270 gpd when operating at maximum enrollment capacity.

<table>
<thead>
<tr>
<th>Use</th>
<th>Quantity</th>
<th>Units</th>
<th>Wastewater Generation Rate (gpd/unit) /a/</th>
<th>Wastewater Generation (gpd)</th>
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<tr>
<td>Proposed Firestone Education Center</td>
<td>9,000</td>
<td>students</td>
<td>20</td>
<td>180,000</td>
</tr>
<tr>
<td>Building 4 – Warehouse (to be demolished)</td>
<td>189,212</td>
<td>square feet</td>
<td>0.025</td>
<td>-4,730.30</td>
</tr>
</tbody>
</table>

**Net Increase in Wastewater Generation at the Project Site**

**175,289.70**

/a/ Wastewater generation rates were obtained from the Sanitation Districts of Los Angeles County, Table 1: Loadings for Each Class of Land Use, which is available at http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3531.

March 13, 2014

Mr. Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017

SUBSEQUENT DRAFT ENVIRONMENTAL IMPACT REPORT (SDEIR)  
2013 FIRESTONE EDUCATION CENTER (FEC) MASTER PLAN  
LOS ANGELES COMMUNITY COLLEGE DISTRICT (LACCD)  
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORK COMMENTS

Thank you for the opportunity to review the SDEIR for the 2013 FEC Master Plan. This report will update the East Los Angeles Firestone Education Center Final EIR (2009 Final EIR) adopted in December 2009, which allowed the LACCD to acquire the project site with the intent of relocating and expanding the South Gate Education Center (SGEC). The FEC would accommodate approximately 9,000 students.

The proposed project includes the demolition of the 220,550 square-foot Building 4 and its connections to Building 3, and the construction of a new 100,000 square-foot building and approximately 1,600-space parking structure. Additionally, the project site would be improved with an approximately 60-space surface parking lot, landscaping, an open space area, and other outdoor recreational amenities.

The following County of Los Angeles, Department of Public Works comments are for your consideration.

Geology and Soils – Section 4.4

1. The SDEIR has not adequately addressed liquefaction and its potential effects on the proposed development. A soils report which addresses liquefaction along with any other geologic hazards and recommends any necessary mitigation measures shall be included in the final EIR.

For questions regarding the geology and soils comment, please contact Jeremy Wan of Geotechnical and Materials Engineering Division at (626) 458-7980 or jwan@dpw.lacounty.gov.
**Transportation and Traffic – Section 4.12**

1. Public Works concurs with the findings of the SDEIR regarding the traffic generated by the project and cumulative traffic of the project and other related projects in the area will significantly impact the following County intersections:

   a) Alameda Street at Nadeau Street
   b) Alameda Street at Firestone Boulevard
   c) Alameda Street at 92\textsuperscript{nd} Street/Southern Avenue
   d) Pacific Boulevard at Broadway

   Additionally, Public Works concurs that there are no feasible physical mitigation measures and that the impacts at the above intersections will remain significant and unavoidable. We therefore recommend that the lead agency prepare a Statement of Overriding Considerations to establish the merits of the project despite its impacts to the County's roadways and intersections.

For questions regarding the traffic comment, please contact Andrew Ngumba of Traffic & Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov

If you have any other questions or require additional information, please contact Juan Sarda of Land Development Division at (626) 458-4921 or jsarda@dpw.lacounty.gov.

JS:

P:\dpub\SUBPCHECK\Plan Checking Files\Zoning Permits\NonCounty Projects\2525 Firestone Boulevard - Firestone Education Center Master Plan\SDEIR\2014-03-13, 2013 FIRESTONE EDUCATION CENTER MASTER PLAN, SDEIR, DPW COMMENTS.docx
LETTER 8

March 13, 2014

County of Los Angeles Department of Public Works
Juan Sarda, Land Development Division

Response 8-1

This comment contains introductory remarks, and no response is necessary.

Response 8-2

This comment states that the Subsequent Draft EIR does not adequately address liquefaction and recommends that a soils report, which addresses liquefaction along with other geological hazards and identifies mitigation measures, be included in the Subsequent Final EIR.

As discussed Section 4.4 Geology and Soils of the Subsequent Draft EIR, the proposed project is required to comply with all Field Act requirements. The Field Act, contained in the California Education Code Sections 17280, et. seq. for K–12 and 81130, et. seq. for community colleges, established the Division of the State Architect (DSA) which develops accessibility, structural safety, fire and life safety, and historical building codes and standards utilized in various public and private buildings throughout the State of California. The DSA also provides plan review and design and construction oversight for K–12 schools, community colleges, and various other state-owned and leased facilities. The Field Act imposes important requirements on California schools that are not present in other types of construction approval processes:

- Licensed design professionals must prepare drawings and specifications for proposed construction work;
- Drawings and specifications have to be verified by DSA for compliance with applicable building codes;
- The building codes utilized in the design of school buildings contain structural provisions superior to many other types of facilities, with consideration for known seismic activity in California;
- A project owner (school or community college district) must hire a DSA-certified inspector to oversee construction. The inspector selection must be approved by the design professionals and the DSA;
- Changes to approved drawings and specifications for DSA-regulated portions of the project shall be submitted and approved by DSA prior to commencement of work; and
- At the conclusion of construction, the design professionals, the inspector and the contractor shall file verified reports with DSA indicating the work has been performed in compliance with the approved plans and specifications.

Approval of a site-specific geotechnical report and liquefaction study (if determined necessary) by a DSA Building Official prior to issuance of a grading permit, as well as review and approval of all construction and design plans by the DSA would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with geological hazards to the greatest extent feasible.

Response 8-3

This comment contains closing remarks and concurs with the conclusions in the Subsequent Draft EIR that there are no feasible mitigation measures to reduce the significant and unavoidable traffic impacts that have been identified at four county intersections. The comment further recommends that LACCD prepare a Statement of Overriding Considerations (SOC) to establish the merits of the proposed project despite the impacts to the County’s roadways and intersections. The comments are noted and will be forwarded to the decision-makers for their review and consideration prior to any approval or denial action being taken on the project.
March 3, 2014

Mr. Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: Comments on Firestone Education Center Master Plan Subsequent Draft Environmental Impact Report

Dear Mr. Hall:

The City of South Gate (City) appreciates the opportunity to review and comment on the Firestone Education Center Master Plan Subsequent Draft Environmental Impact Report (Subsequent DEIR) prepared by Terry A. Hayes Associates Inc. (TAHA) dated January 2014. As demonstrated by City staff in our meetings with the Los Angeles Community College District (LACCD) in October 2013, the City endeavors to be a partner in making the proposed Firestone Education Center (FEC) a success for both LACCD the as well as for the residents and students of the City and surrounding region.

The City has the following comments on the Subsequent DEIR:

1. On page 4.8-11 of the Subsequent DEIR, the discussion under subheading "Parking" briefly discusses the potential parking impacts associated with implementation of the proposed project. Based on the project description, the parking structure will be located on the most northerly end of the project site with the main access to be located at the intersection of Santa Fe Avenue at Ardmore Avenue, which is adjacent to the Union Pacific Railroad (UPRR) tracks.

However, the proposed project does not provide any additional details regarding the proposed layout of the parking spaces. It is important to have these details fully developed by the time LACCD applies for the General Order (GO) 88-B from the California Public Utilities Commission (CPUC) and UPRR to modify the existing railroad crossing. The CPUC and UPRR will generally be concerned about the design of the parking structure and parking layout in the immediate vicinity of said intersection because of potential queues...
extending back to the intersection and railroad crossing created by drivers "waiting" for a parking spot. It is advisable that LACCD initiate discussions as soon as possible with the CPUC and UPRR regarding potential modifications to the existing railroad crossing.

Based on our meetings in October 2013, it is our understanding that the proposed parking structure will not be gated. However, because parking structure will be limited to two main access points, access to the parking structure may be difficult at times such that it may be more convenient for the students to park on City streets instead of parking in the parking structure and adversely impact parking to the neighboring residential neighborhood. As agreed to in the meetings of October 2013, the City and LACCD will work cooperatively together to address potential future parking impacts the FEC may have to the residential neighborhoods. Potential measures may need to include of the implementation of traffic calming measures in the residential neighborhoods.

2. On pages 4.12-41 and 42 of the Subsequent DEIR, the discussion under subheading "Public Transit, Bicycle, or Pedestrian Facilities" briefly discusses the potential impacts to pedestrian facilities only in general terms. As we discussed in the meetings of October 2013, the pedestrian travel patterns will become evident when the FEC opens and is fully operational. Consequently, the City and LACCD agreed to work cooperatively together to address future needs for pedestrian facilities.

3. On page 4.12-43 of the Subsequent DEIR, various improvement and cost sharing alternatives are provided for the intersection of Calden Avenue/Project Access at Firestone Boulevard. It should clarify that the proposed traffic signal improvements may also result in associated civil road improvements in the immediate vicinity of the intersection, which are unknown at this time because the design is not yet completed. These associated civil road improvements will be included as part of the cost sharing. Please also note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City. It is advisable that LACCD initiate detailed discussions with the City regarding the design of said improvements.

4. On page 4.12-44 of the Subsequent DEIR, Mitigation Measure TT1 should clarify that the proposed installation of a traffic signal for the intersection of Santa Fe Avenue at Armdore Avenue/Project Access will also require the LACCD to obtain approvals from the CPUC and UPRR to modify the existing adjacent railroad crossing. Please also note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City. It is advisable that LACCD initiate detailed discussions with the City, the CPUC and UPRR regarding the design of said improvements.

5. On page 4.12-44 of the Subsequent DEIR, Mitigation Measure TT3 should clarify that the proposed relocation of the Los Angeles County Metropolitan Transportation Authority (Metro) bus stop on Firestone Boulevard is subject to the approval by Metro.

6. On page 4.12-46 of the Subsequent DEIR, a significant and unavoidable impact was identified for the intersection of Santa Fe Avenue at the Project Driveway/Armdore Avenue. It is advisable that LACCD work cooperatively with the City to identify other potential
measures that could lessen the significant adverse impact. Please note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City.

The City appreciates the opportunity to provide comments on the Subsequent DEIR. If you have any questions or desire additional information, please contact me at (323) 563-9582.

Sincerely,

Nisha Patel, P.E.
Assistant City Engineer

cc: Michael Flad, City Manager
    David Torres, Interim Director of Public Works
    Steve Lefever, Director of Community Development
    Scott Ma, Hartzog & Crabill, Inc.
LETTER 9

March 3, 2014

City of South Gate, Public Works Field Operations
Nisha Patel, P.E., Assistant City Engineer
4244 Santa Ana Street
South Gate, CA 90280

Response 9-1

This comment contains introductory remarks, and no response is necessary.

Response 9-2

This comment relates to the proposed parking structure and the proposed layout of parking spaces. As suggested in this comment, LACCD will initiate discussions with the CPUC and the UPPR regarding potential modifications to the existing railroad crossing. The City and LACCD will work cooperatively together to address potential future parking impacts that the proposed project may have in residential neighborhoods as agreed upon.

Response 9-3

This comment relates to potential impacts to pedestrian facilities. As stated by the commenter, the City and LACCD will work cooperatively together to address future needs for pedestrian facilities based on pedestrian travel patterns when the Firestone Education Center opens and becomes fully operational as agreed upon.

Response 9-4

As discussed on page 4.12-43 of the Subsequent Draft EIR, application of the City of South Gate’s significant impact threshold criteria indicates that the proposed project is expected to result in incremental but not significant impacts at the intersection of Project Driveway-Calden Avenue/Firestone Boulevard. Even though no significant traffic impacts are identified at this intersection, the City of South Gate and LACCD have agreed to implement the joint traffic signal improvement integrating the project driveway into the approved Calden Avenue/Firestone Boulevard traffic signal under a single signal controller. As acknowledged in the comment, detailed design associated with the joint traffic signal has not yet been determined, including any potential civil-related improvements. Therefore, should this project be approved by the LACCD Board of Trustees and at such time when the formal traffic engineering design plan preparation effort is initiated, the appropriate coordination, including application for any required encroachment permits, will transpire with the City of South Gate.

Response 9-5

As discussed on page 79 of the Subsequent Draft EIR, Traffic Impact Study, should the proposed project be approved, the mitigation measure associated with the Santa Fe Avenue and Project Driveway/Ardmore Avenue intersection would need to be formally designed and constructed prior to occupancy of the project. At such time as the formal signal design process is initiated, the necessary coordination with the CPUC and/or UPPR will occur and details (i.e., such as the need for and design of traffic signal preemption given the proximity of the existing Santa Fe Avenue railroad crossing gates and control) will be discussed and addressed as part of the traffic signal pre-design coordination effort. In addition, the appropriate continued coordination, including application for any required encroachment permits, will transpire with the City of South Gate as part of the traffic engineering design plan preparation effort for the mitigation measure proposed at the intersection of Santa Fe Avenue/Project Driveway-Ardmore Avenue.
In response to this comment, Mitigation Measure TT1 has been revised as follows to provide clarification:

**TT1**  LACCD shall install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage. The outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided. Approvals will be obtained from the California Public Utilities Commission, Union Pacific Railroad and the City of South Gate as required.

**Response 9-6**

Should the project be approved by the LACCD Board of Trustees, the appropriate coordination will transpire with Metro as part of the traffic engineering design plan preparation effort for the mitigation measures proposed at the intersection of Santa Fe Avenue and Firestone Boulevard, including the recommendation to relocate the existing eastbound near-side bus stop to a far-side bus stop.

In response to this comment, Mitigation Measure TT3 has been revised as follows to provide clarification:

**TT3**  LACCD shall install eastbound and westbound exclusive right-turn only lanes. The existing eastbound and westbound combination through-right turn lanes shall be restriped to provide a 10-foot through lane with a 12-foot wide right-turn only lane for both the eastbound and westbound approaches. Up to two on-street parking spaces shall also be removed along the north and south sides of Firestone Boulevard. Additionally, LACCD shall coordinate with the City of South Gate regarding the proposed relocation of the existing eastbound near-side bus stop to a far-side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.

**Response 9-7**

The comment states that a significant and unavoidable impact was identified for the intersection of Santa Fe Avenue and Project Driveway/Ardmore Avenue. As a point of clarification, the Santa Fe Avenue intersection where a significant weekday PM peak hour traffic impact would remain significant and unavoidable in the year 2031 conditions is at the intersection of Santa Fe Avenue and Project Driveway/Orchard Place. Mitigation for this location consists of restriping the northbound and southbound approaches on Santa Fe Avenue to provide a northbound left-turn lane and a southbound left-turn lane. This improvement can be accommodated within the existing Santa Fe Avenue roadway width.

The City of South Gate requires that the level of service for one-way stop-controlled and two-way stop-controlled intersections be based solely on the worst case delays experienced on the minor street approach, regardless of whether a project would directly contribute traffic to that approach or not. For the subject intersection, the worst case minor street approach delay is expected to occur on westbound Orchard Place. Although the proposed northbound and southbound left-turn improvement can be considered feasible and appropriate in providing additional vehicular capacities to the intersection, from the City of South Gate’s unsignalized intersection calculation standpoint, it does not reduce the project’s significant traffic impact in the PM peak hour to a less than significant level (i.e., the delays for the westbound Orchard Place approach would remain the same with or without the recommended improvement).

The statement advising that LACCD continue to work cooperatively with the City to identify other potential measures that could lessen the significant adverse impact at this intersection is noted and will be carefully considered by the LACCD team.
The appropriate continued coordination, including application for any required encroachment permit, will transpire with the City of South Gate as part of the traffic engineering design plan preparation effort for the mitigation measures proposed at the intersection of Santa Fe Avenue/Project Driveway-Orchard Place.

**Response 9-8**

This comment contains closing remarks, and no response is necessary.
Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Blvd., 6th Floor  
Los Angeles, CA. 90017  
Date: February 8, 2014

Dear Mr. Hall,

This project will bring hopes and opportunities for my children to improve their lives by obtaining a higher education which in turn affects their own lives as well as the lives of people around them.

We appreciate your hard work to bring this project to reality.

Sincerely,

Alfanzo Alarcon  
8913¾ Tope Ave.,  
South Gate, CA. 90280
LETTER 10

February 8, 2014

Alfanzo Alacron
8919 ¾ Tope Avenue
South Gate, CA 90280

Response 10-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Blvd., 6th Floor
Los Angeles, CA. 90017
Date: February 3, 2014

Dear Mr. Hall,

This project provides opportunities and ways for my sons and daughters to improve their lives by obtaining a higher education which in turn affects their own lives as well as the lives of people around them.

We appreciate your hard work to bring this project to reality.

Sincerely,

Luisa Alonso
8919 ¾ Tope Ave.,
South Gate, CA. 90280
LETTER 11

February 3, 2014

Luisa Alonso
8919 ¼ Tope Avenue
South Gate, CA 90280

Response 11-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Blvd., 6th Floor  
Los Angeles, CA. 90017  
Date: February 6, 2014

Dear Mr. Hall,

Thank you for providing a path way for me to continue my education in my neighborhood where I can be effective and improve my life by obtaining a higher education.

I appreciate your vision to make this project possible for young folks like me.

Sincerely,

Jose Luis Alonso  
8919 ¾ Tope Ave.,  
South Gate, CA. 90280
LETTER 12

February 6, 2014

Jose Luis Alonso
8919 ¼ Tope Avenue
South Gate, CA 90280

Response 12-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
3.0 CORRECTIONS AND ADDITIONS

As required by Section 15088 of the CEQA Guidelines, this section provides corrections or clarifications to the Subsequent Draft EIR. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the CEQA Guidelines. Corrections and Additions to the Subsequent Draft EIR are provided in underline or strikeout text as needed to indicate an addition or deletion, respectively.

SECTION 2.0 SUMMARY

- Subsequent Draft EIR page 2-6, Table 2-1, Mitigation Measures HM1, TT1 and TT3 revise as shown below under headings Section 4.6 Hazards and Hazardous Materials and Section 4.12 Transportation and Traffic.

SECTION 4.6 HAZARDS AND HAZARDOUS MATERIALS

- Subsequent Draft EIR page 4.6-14, Mitigation Measures HM1, revise as follows:

  HM1 Should LACCD encounter any previously unidentified contaminants requiring remediation during construction, an action plan shall be developed, approved by Department of Toxic Substances Control (DTSC) as appropriate, and implemented, prior to resuming in conjunction with construction activities in the contaminated area. As needed, the investigation and remediation of a release or threatened release of any hazardous substances at or from the project site can be overseen by the DTSC in accordance with the Voluntary Cleanup Agreement between DTSC and LACCD.

SECTION 4.11 PUBLIC SERVICES

- Subsequent Draft EIR page 4.11-3, revise as follows:

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<td>Two-Person Paramedic Squad</td>
<td>1 Captain, 1 Firefighter Specialist, 2 Firefighter Paramedics</td>
</tr>
</tbody>
</table>

/a/ A quint is a combination engine/ladder truck apparatus.

SOURCE: Los Angeles County Fire Department, Planning Division, email correspondence with Loretta Bagwell, Planning Analyst, January 31, 2013 and written comments on the Subsequent Draft Environmental Report for the 2013 Firestone Education Center Master Plan from Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, February 13, 2014.
Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2012, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:38-4:43 minutes and 5:36-7:30 minutes, respectively. Fire Station 16 responded to 3,782-3,924 incidents during that time period, of which, 80-85 were fire related, 3,164-3,312 were emergency medical incidents, and 538-527 were other types.4

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southwest of the project site. In 2012, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:07-4:10 minutes and 5:10-5:44 minutes, respectively. Fire Station 147 responded to 2,315-2,849 incidents during that time period, of which, 78-49 were fire related, 2,586-2,462 were emergency medical incidents, and 491-338 were other types.5

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2012, Fire Station 54 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 5:03-4:59 minutes and 6:25-6:48 minutes, respectively. Fire Station 54 responded to 3,037-2,942 incidents during that time period, of which, 103-96 were fire related, 2,587-2,559 were emergency medical incidents, and 347-287 were other types.6

SECTION 4.12 TRANSPORTATION AND TRAFFIC

- Subsequent Draft EIR page 4.12-44, Mitigation Measures TT1 and TT3, fourth sentence, revise as follows:

**TT1** LACCD shall install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage. The outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided. Approvals will be obtained from the California Public Utilities Commission, Union Pacific Railroad and the City of South Gate as required.

**TT3** LACCD shall install eastbound and westbound exclusive right-turn only lanes. The existing eastbound and westbound combination through-right turn lanes shall be restriped to provide a 10-foot through lane with a 12-foot wide right-turn only lane for both the eastbound and westbound approaches. Up to two on-street parking spaces shall also be removed along the north and south sides of Firestone Boulevard. Additionally, LACCD shall coordinate with the City of South Gate regarding the proposed relocation of the existing eastbound near-side bus stop to a far-side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.

SECTION 4.13 UTILITIES AND SERVICE SYSTEMS

- Subsequent Draft EIR page 4.13-9, Wastewater Treatment heading, fourth sentence, revise as follows:

The JWPCP has a design capacity of 400 million gpd and currently processes an average flow of 275-263.2 million gpd of wastewater.

---


5Ibid.

6Ibid.
Subsequent Draft EIR page 4.13-9, Wastewater Conveyance Infrastructure heading, last sentence, revise as follows:

The Mountain View-Belle Vernon Relief Extension Trunk Sewer is an 18-inch pipe with a design capacity of 1.9 million gpd and conveyed a peak flow of 1.3-0.2 million gpd in 2009-2013.
APPENDIX A
Queuing Analysis Worksheets
**General Information**
- **Analyst**: ACY
- **Agency or Co.**: LLG Engineers
- **Date Performed**: 3/19/2014
- **Time Period**: AM Peak Hour

**Site Information**
- **Intersection**: 30. I-710 SB/Firestone
- **Area Type**: All other areas
- **Jurisdiction**: City of South Gate
- **Analysis Year**: Year 2031 Cumulative Condition

### Volume and Timing Input

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**Duration of Analysis (hrs) = 0.25**

**Cycle Length C = 90.0**

### Lane Group Capacity, Control Delay, and LOS Determination

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**HCS+™ Version 5.21**

**Generated: 3/19/2014  5:58 PM**
### General Information

**Project Description**  
I-710 SB Ramps/Firestone Bl 2031 Cumulative AM Peak Hour

### Average Back of Queue

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### Queue Storage Ratio

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**General Information**

- **Analyst**: ACY
- **Agency or Co.**: LLG Engineers
- **Date Performed**: 3/19/2014
- **Time Period**: PM Peak Hour

**Site Information**
- **Intersection**: 30. I-710 SB/Firestone
- **Area Type**: All other areas
- **Jurisdiction**: City of South Gate
- **Analysis Year**: Year 2031 Cumulative

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## Volume and Timing Input

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### Phasing

- **Thru & RT**: 02 03 04 SB Only 06 07 08
  - **Timing**: G = 67.0 G = G = G = G = 24.0 G = G = G =
  - **Y = 5** Y = Y = Y = Y = Y = Y = Y =

**Duration of Analysis (hrs) = 0.25**

---

## Lane Group Capacity, Control Delay, and LOS Determination

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**Intersection LOS**: F
**BACK-OF-QUEUE WORKSHEET**

### General Information

**Project Description**  
I-710 SB Ramps/Firestone Bl- 2031 Cumulative PM Peak Hour

### Average Back of Queue

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### Percentile Back of Queue (95th percentile)

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### General Information

- **Analyst**: ACY
- **Agency or Co.**: LLG Engineers
- **Date Performed**: 3/18/2014
- **Time Period**: AM Peak Hour

### Site Information

- **Intersection**: 31. I-710 NB/Firestone
- **Area Type**: All other areas
- **Jurisdiction**: City of South Gate
- **Analysis Year**: Year 2031 Cumulative Condition

### Volume and Timing Input

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<td>RT</td>
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#### Number of Lanes

- EB: 3 lanes
- WB: 1 lane
- NB: 2 lanes
- SB: 1 lane

#### Lane Group

- EB: T
- WB: R
- NB: 3
- SB: 3

#### Volume (vph)

- EB: 1877
- WB: 2376
- NB: 445
- SB: 271

#### % Heavy Vehicles

- EB: 5%
- WB: 5%
- NB: 5%
- SB: 5%

#### PHF

- EB: 1.00
- WB: 1.00
- NB: 1.00
- SB: 1.00

#### Pretimed/Actuated (P/A)

- EB: A
- WB: A
- NB: A
- SB: A

#### Startup Lost Time

- EB: 2.0
- WB: 2.0
- NB: 2.0
- SB: 2.0

#### Extension of Effective Green

- EB: 2.0
- WB: 2.0
- NB: 2.0
- SB: 2.0

#### Arrival Type

- EB: 3
- WB: 3
- NB: 3
- SB: 3

#### Unit Extension

- EB: 3
- WB: 3
- NB: 3
- SB: 3

#### Ped/Bike/RTOR Volume

- EB: 0
- WB: 0
- NB: 0
- SB: 0

#### Lane Width

- EB: 12.0
- WB: 12.0
- NB: 12.0
- SB: 12.0

#### Parking/Grade/Parking

- EB: N
- WB: N
- NB: N
- SB: N

#### Parking/Hour

- EB: 0
- WB: 0
- NB: 0
- SB: 0

#### Minimum Pedestrian Time

- EB: 3.2
- WB: 3.2
- NB: 3.2
- SB: 3.2

#### Phasing

- EB: Thru & RT
- WB: 02
- NB: 03
- SB: 04
- Cycle Length C = 90.0

#### Duration of Analysis (hrs) = 0.25

#### Timing

- EB: G = 62.0
- WB: G =
- NB: G =
- SB: G =
- G = 19.0
- G =
- G =
- G =

#### Lane Group Capacity, Control Delay, and LOS Determination

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HCS+™ Version 5.21 Generated: 3/18/2014 5:09 PM
## General Information

**Project Description**: I-710 NB Ramps/Firestone Bl- 2031 Cumulative AM Peak Hour

### Average Back of Queue

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### Percentile Back of Queue (95th percentile)

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### Queue Storage Ratio

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## General Information

**Analyst**: ACY  
**Agency or Co.**: LLG Engineers  
**Date Performed**: 3/19/2014  
**Time Period**: PM Peak Hour

## Site Information

**Intersection**: 31. I-710 NB/Firestone  
**Area Type**: All other areas  
**Jurisdiction**: City of South Gate  
**Analysis Year**: Year 2031 Cumulative  
**Condition**:

## Volume and Timing Input

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## Lane Group Capacity, Control Delay, and LOS Determination

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# BACK-OF-QUEUE WORKSHEET

## General Information

**Project Description**  I-710 NB Ramps/Firestone Bl- 2031 Cumulative PM Peak Hour

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## Queue Storage Ratio

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FIRESTONE EDUCATION CENTER MASTER PLAN
SUBSEQUENT FINAL ENVIRONMENTAL IMPACT REPORT

Prepared for
LOS ANGELES COMMUNITY COLLEGE DISTRICT

Prepared by
TERRY A. HAYES ASSOCIATES INC.

March 2014
2013 FIRESTONE EDUCATION CENTER
MASTER PLAN

SUBSEQUENT FINAL
ENVIRONMENTAL IMPACT REPORT

Prepared for

LOS ANGELES COMMUNITY COLLEGE DISTRICT
770 Wilshire Boulevard
Los Angeles, CA 90017

Prepared by

TERRY A. HAYES ASSOCIATES INC.
8522 National Boulevard, Suite 102
Culver City, CA 90232

March 27, 2014
# TABLE OF CONTENTS

**SUBSEQUENT DRAFT EIR**  
(Published January 2013 under separate cover)

<table>
<thead>
<tr>
<th>Section</th>
<th>Details</th>
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Appendix A  Queuing Analysis Worksheets
1.0 INTRODUCTION

This Subsequent Final Environmental Impact Report (EIR) has been prepared pursuant to the requirements of California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et seq., and the guidelines promulgated in connection therewith at Title 14 Code of California Regulation (CCR) Section 15000 et seq. (the “CEQA Guidelines”). The Subsequent Final EIR together with the Subsequent Draft EIR published in January 2014 addresses the potential environmental effects resulting from the implementation of the 2013 Firestone Education Center Master Plan (proposed project).

1.1 LEAD AGENCY

The Los Angeles Community College District (LACCD) is the Lead Agency in accordance with Section 15367 of the CEQA Guidelines, which defines the lead agency as “the public agency that has the principal responsibility for carrying out or approving the project.” The project proponent, as well as CEQA Lead Agency for the proposed project is:

Los Angeles Community College District
Thomas Hall, Executive Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

1.2 INTENDED USE OF THE SUBSEQUENT FINAL EIR

This Subsequent Final EIR was prepared at the direction and under the supervision of the LACCD. The intended use of this EIR is to assist the LACCD Board of Trustees in making decisions regarding the approval and implementation of the proposed project. This Subsequent Final EIR is required under Section 15132 of the CEQA Guidelines to include the Subsequent Draft EIR or a revised version; comments and recommendations received on the Subsequent Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Subsequent Draft EIR; responses to those comments; and any other relevant information added by the lead agency. The public review for the Subsequent Draft EIR began on January 17, 2014 and closed on March 3, 2014 (a total of 45 days). This document summarizes the project information presented in the Subsequent Draft EIR and contains responses to comments received on the Subsequent Draft EIR.

This Subsequent Final EIR is the primary reference document for the formulation and implementation of a Mitigation Monitoring and Reporting Program (MMRP) for the proposed project. Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with the CEQA Guidelines (14 CCR Section 15000 et seq.), if a lead agency approves a project that has significant impacts that are not substantially mitigated (i.e., unavoidable significant impacts), the agency shall state in writing the specific reasons for approving the project based on the final CEQA documents and any other information in the public record for the project (CEQA Guidelines Section 15093, subd. (b)). This is called a “statement of overriding considerations” (CEQA Guidelines Section 15093). This Subsequent Final EIR along with a MMRP and an accompanying statement of overriding considerations will be submitted to the LACCD Board of Trustees for action as part of requested certification of the Subsequent Final EIR.
1.3 SUMMARY OF THE PROPOSED PROJECT

Implementation of the proposed project consists of the construction and operation of the Firestone Education Center (FEC), a new LACCD satellite campus that would replace the existing South Gate Educational Center (SGEC), provide for expanded and improved educational facilities, and accommodate existing and projected student enrollment. The FEC would accommodate up to 9,000 students. The timeframe for this level of enrollment is uncertain; however, for purposes of analysis, based on LACCD projections it is assumed that student enrollment capacity would be met in 2031.\(^1\) The FEC would offer academic programs parallel to those available at the main ELAC campus and allow students to complete their degree and transfer requirements at one convenient location.

The proposed project includes the demolition of the 220,550-square-foot Building 4 and its connections to Building 3, and the construction of a new 100,000-gross-square-foot building and an approximately 1,600-space parking structure on the northern portion of the project site.\(^2\) In addition, the project site would be improved with an approximately 60-space surface parking lot, landscaping, an open space area, and other outdoor amenities. Vehicular access and circulation improvements would also be implemented on- and off-site. Buildings 1, 2, and 3 would not be used for college uses, and LACCD would continue to lease these facilities to tenants for warehousing and other appropriate uses. Existing uses within Building 4 would be relocated to Building 1 or 3. The final design would result from the collaboration of ELAC and a Design/Build Team selected to carry the proposed project forward.

1.4 SUMMARY OF PROPOSED PROJECT IMPACTS

Impacts of the proposed project fall into four categories: 1) significant and unavoidable impacts that cannot be mitigated to a less-than-significant level, 2) potentially significant impacts that can be mitigated to a less-than-significant level, 3) less-than-significant impacts without mitigation, or 4) no impact. The Subsequent Draft EIR determined that the proposed project would have unavoidable significant impacts on the following:

- **Cultural Resources (Historical Resources).** Due to the removal of Building 4 and its connections to Building 3, the proposed project would create significant and unavoidable impacts related to historical resources. Mitigation measures are proposed to address these impacts; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Noise (Construction).** Noise generated by construction of the proposed project would exceed the City’s significance threshold at residential land uses north and east of the proposed project site resulting in significant and unavoidable impacts related to noise. Mitigation measures are proposed to address this impact; however, no feasible mitigation measures were identified to reduce the significant impact to a less-than-significant level.

- **Transportation and Traffic (Circulation System and Congestion Management Plan).** New vehicle trips resulting from the proposed project would create significant and unavoidable impacts related to the circulation system (i.e., intersection operations and Congestion Management Plan [CMP]). Mitigation measures are proposed to address impacts related to the circulation system; however, no feasible mitigation measures were identified to reduce all of the significant impacts to a less-than-significant level. No feasible mitigation measures were identified to reduce the significant impact related to the CMP (i.e., intersection) to a less-than-significant level.

---

\(^1\)Depending on a number of factors including the economy, State funding and growth restrictions, and availability of educational facilities elsewhere, the date when this level of enrollment could occur may be delayed.

\(^2\)Building 4 is connected to Building 3 through a first floor passageway, a third floor bridge, and a building extension.
1.5 NOTICING AND AVAILABILITY OF THE SUBSEQUENT DRAFT EIR

In compliance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for the Subsequent Draft EIR was issued on December 14, 2012 for a 30-day public review period. The Subsequent Draft EIR was then made available for a 45-day public review period beginning January 17, 2014 through March 3, 2014. During this period, 12 written comments on the Subsequent Draft EIR were received. In addition, two public meetings were held during the review period on February 5, 2014 and February 19, 2014 to receive public comments on the Subsequent Draft EIR.
2.0 RESPONSES TO COMMENTS FROM PERSONS AND ORGANIZATIONS CONSULTED

This chapter contains responses to all of the comments received by the Los Angeles Community College District (LACCD) during the public review period for the proposed 2013 Firestone Education Center Master Plan (proposed project) Subsequent Draft Environmental Impact Report (EIR). In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, detailed responses to comments on environmental issues have been provided below that describe the disposition of significant environmental issues raised. Reasons are provided when recommendations, suggestions, and objections raised in comments letters were not accepted. Issues raised by the public in response to the Subsequent Draft EIR warrant clarification or correction of certain statements in the Subsequent Draft EIR but none of the corrections and additions constitute significant new information as defined by CEQA Guidelines Section 15088.5.

2.1 PUBLIC REVIEW

In accordance with CEQA Guidelines Sections 15087 and 15105, this Subsequent Draft EIR was made available for a 45-day public review period that began on January 17, 2014 and concluded March 3, 2014. On January 16, 2014, a Notice of Availability (NOA) of the Subsequent Draft EIR was circulated. The NOA informed responsible and trustee agencies and the public of the review period and where to find the document. The NOA also invited agencies and the public to submit written comments on the information contained in the document and to attend one of two public meetings held on the proposed project. The NOA was mailed to interested public agencies, owners and tenants of properties within 1,000 feet of the project site and those agencies and individuals who either attended the public scoping meeting on the Subsequent Draft EIR held on January 10, 2013 or submitted comment letters in response to the Notice of Preparation of the Subsequent Draft EIR issued December 14, 2012. Additionally, the NOA was published in local newspapers; the LA Opinion and Los Angeles Sentinel on January 23, 2014.

2.2 PUBLIC MEETING COMMENTS

Public meetings were held on February 5, 2014 and February 19, 2014 at the South Gate Educational Center to inform interested individuals of the findings of the Subsequent Draft EIR. Verbal questions and comments were received during the public meetings and responses were provided as appropriate. Attendees were encouraged to submit their comments in writing; however, no written comments were received from attendees. The verbal comments received at the public meetings were not directed towards the content or findings of the Subsequent Draft EIR. However, concerns were expressed regarding potential construction traffic impacts, hazardous conditions associated with the existing buildings, the demolition of historic structures, and air quality impacts associated with the scrap metal facility located northwest of the project site.

The commenters were informed that during construction, signage would be provided along roadways to reduce potential construction traffic impacts, as necessary. Regarding hazardous conditions associated with existing buildings, the new Firestone Education Center would be housed in a newly constructed building, and therefore, would not occupy any existing buildings. Further, mitigation measures have been indentified in Section 4.6 Hazards and Hazardous Materials of the Subsequent Draft EIR to reduce potential impacts related to hazardous materials to less-than-significant levels. With regard to the demolition of historic resources, it was explained to the commenters that Building 4 would be demolished as part of the proposed project. However, while Building 4 was identified as a contributor to the California Register-eligible South Gate Historic District, it was determined not to be individually eligible for listing on the California Register. Buildings 1, 2, and 3, all of which are individually eligible for listing on the California Register, would remain under the proposed project. These buildings would continue to be dominant visual features on the project site. The historic character of the
project site would be retained, and mitigation measures have been identified in Section 4.3 Cultural Resources of the Subsequent Draft EIR to reduce significant impacts related to historical resources to the maximum extent feasible.

Concerns related to air quality emissions associated with the scrap metal facility were first brought up at the Subsequent Draft EIR Scoping Meeting held January 10, 2013. Individuals expressed concern that the scrap metal recycling facility may be operating beyond its permitted capacity, and there was concern related to pollutant exposure and potential adverse health effects. The approximately 2.9-acre metal recycling site is located at 8440 S. Alameda Street, approximately 1,000 feet northwest of the project site. According to South Coast Air Quality Management District (SCAQMD) records, this facility generates criteria pollutants along with 0.029 tons per year of nickel, which has been identified by the State Office of Environmental Health Hazard Assessment as a toxic air contaminant.

A commenter suggested that a Health Risk Assessment (HRA) be prepared for the proposed project. However, CEQA does not require the preparation of HRAs for projects. California law provides that the impact of the existing environment on a potential project is outside the purview of CEQA, and that CEQA documents must address the impact of the project on the existing environment, not vice versa. While LACCD has prepared HRAs for various other projects within the district, these HRAs were prepared at the request of the SCAQMD because the projects included programs or facilities that may house pre-school, primary or secondary school age children on LACCD campuses or properties. No such facilities are planned as part of the proposed project. The basis for this consideration has been State Education Code Section 17213 that requires disclosure for this age range of students. In this instance, while the Notice of Availability (NOA) was provided to the SCAQMD, no request for an HRA has been received from the SCAQMD for the proposed project.

2.3 WRITTEN COMMENTS

During the review period, 12 written comment letters on the Subsequent Draft EIR were received. Each comment letter has been assigned a number. The body of each comment letter has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Letter 1 is depicted as Comment 1-1, and so on. These numbered comment letters are included in their entirety, followed by the corresponding responses which include a brief summary of comment. Corrections and additions to the Subsequent Draft EIR are provided in underline or strikeout text as needed to indicate an addition or deletion, respectively.

The following presents a list of all persons or organizations who submitted written comments on the Subsequent Draft EIR:

1. State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit
2. State of California, Native American Heritage Commission (NAHC)
3. State of California, Department of Transportation (Caltrans)
4. State of California, Public Utilities Commission (CPUC)
5. County of Los Angeles Fire Department (LACFD)
6. Los Angeles County Metropolitan Transportation Authority (Metro)
7. County Sanitation Districts of Los Angeles County (LACSD)
8. County of Los Angeles Department of Public Works (LACDPW)
9. City of South Gate, Public Works Field Operations
10. Alfanzo Alacron
11. Luisa Alonso
12. Jose Luis Alonso
March 4, 2014

Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan
SCH#: 2010121044

Dear Thomas Hall:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 3, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“...A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 10th Street  P.O. Box 3044  Sacramento, California 95812-3044
(916) 445-0613  FAX (916) 323-3018  www.opr.ca.gov
March 10, 2014

Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan
SCH#: 2010121044

Dear Thomas Hall:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 3, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2010121044) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency
March 14, 2014

Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Subject: 2013 Firestone Education Center Master Plan
SC#: 2010121041

Dear Thomas Hall:

The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on March 3, 2014. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2010121044) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency
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<tr>
<td>2010121044</td>
<td>2013 Firestone Education Center Master Plan</td>
<td>Los Angeles Community College District</td>
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**Type** Draft EIR

**Description**
The proposed project consists of the construction and operation of a new LACCD satellite community college campus that would replace the existing South Gate Education Center and accommodate up to 9,000 students. The proposed project includes the demolition of a 220,550 sf building and its connections to the adjacent building, and the construction of a new approximately 100,000 gsf building and a 1,800-space parking structure. The project site would also be improved with a surface parking lot, landscaping, an open space area, and other outdoor amenities. Vehicular access and circulation improvements would be implemented on- and off-site and new traffic signals would be installed at the existing Firestone Boulevard driveway and the proposed Santa Fe Avenue driveway opposite Ardmore Avenue.

### Lead Agency Contact

<table>
<thead>
<tr>
<th>Name</th>
<th>Thomas Hall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency</td>
<td>Los Angeles Community College District</td>
</tr>
<tr>
<td>Phone</td>
<td>213 891 2119</td>
</tr>
<tr>
<td>Email</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td>770 Wilshire Boulevard, 6th Floor</td>
</tr>
<tr>
<td>City</td>
<td>Los Angeles</td>
</tr>
<tr>
<td>State</td>
<td>CA</td>
</tr>
<tr>
<td>Zip</td>
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### Project Location

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### Proximity to:

- **Highways**: I-105
- **Airports**: No
- **Railways**: UPRR
- **Waterways**: No
- **Schools**: SGHS, Stanford ES, etc.
- **Land Use**: Z: Heavy Manufacturing; GP: Mixed Commercial/Industrial; Subarea 1 South Gate College District

### Project Issues

- Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Minerals; Recreation/Parks; Septic System; Vegetation; Wellland/Riparian; Other Issues

### Reviewing Agencies

- Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Public Utilities Commission

### Date Received 01/17/2014   Start of Review 01/17/2014   End of Review 03/03/2014
LETTER 1

March 3, 2014

State of California, Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit
Scott Morgan, Director, State Clearinghouse
1400 10th Street
Sacramento, CA 95812-3044

Response 1-1

This comment letter acknowledges that the proposed project has complied with State Clearinghouse review requirements for draft environmental documents. The second and third comment letters from the State Clearinghouse indicates that the California Department of Transportation (Caltrans) and California Public Utilities Commission (CPUC) submitted a comment letter after the end of the review period and encourages LACCD to respond to it, even though CEQA does not require Lead Agencies to respond to late comments.

A list of State agencies that reviewed the document and comments from responding agencies were enclosed. Comments from responding agencies were limited to the Native American Heritage Commission (NAHC), Caltrans, and the CPUC. Responses to these comment letters are provided as Letters 2, 3, and 4, respectively.
February 3, 2014

Mr. Thomas Hall
Los Angeles Community College District (LACCD)
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

RE: SCH#2010121044 CEQA Notice of Notice of Completion; Subsequent
Environmental Impact Report (SEIR)2013 n for the “Firestone Education
Center Master Plan Project;” located in the South Gate Area; Los Angeles
County, California

Dear Mr. Hall

The Native American Heritage Commission (NAHC) has reviewed the
above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project
which includes archeological resources, is a significant effect requiring the
preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with
this provision and mitigate project-related impacts on archaeological resources,
the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the
identification and evaluation of accidentally discovered archaeological resources,
pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas
of identified archaeological sensitivity, a certified archaeologist and a culturally
affiliated Native American, with knowledge in cultural resources, should monitor
all ground-disturbing activities. Also, California Public Resources Code Section
21083.2 require documentation and analysis of archaeological items that meet
the standard in Section 15064.5 (a)(b)(f).

We suggest that this (additional archaeological activity) be coordinated
with the NAHC, if possible. The final report containing site forms, site
significance, and mitigation measurers should be submitted immediately to the
planning department. Any 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 pursuant
to California Government Code Section 0254.10.
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding environmental justice.) Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

[Signature]

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list
LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 8th St, Rm. 403
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrieno Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtonnga@verizon.net
562-761-6417 - voice
562-761-6417 - fax

Gabrieno-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180
Bonsall, CA 92003
(619) 294-6669 - work
(310) 428-5690 - cell
(760) 636-0854 - FAX
bacuna1@gabrienotribe.org

Gabrieno-Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
GTTRibalcouncil@aol.com
(626) 286-1232 - FAX
(626) 286-1758 - Home
(626) 286-1262 - FAX

Gabrieno-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180
Bonsall, CA 92003
palmsprings9@yahoo.com
626-676-1184 - cell
(760) 636-0854 - FAX

Gabrieno /Tongva Nation
Sandroge Goad, Chairperson
P.O. Box 86908
Los Angeles, CA 90086
sgoad@gabrieno-tongva.com
951-845-0443

Gabrieno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723
brabienoindians@yahoo.com
(626) 926-4131

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.84 of the Public Resources Code and Section 5097.88 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#03100121044; CEQA Notice of Completion; draft Subsequent Environmental Impact Report (SEIR) for the Firestone Education Center Master Plan; located in the South Gate area; Los Angeles County, California.
This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7090.5 of the Health and Safety Code, Section 5097.04 of the Public Resources Code and Section 5087.36 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH2010121044; CEQA Notice of Completion; draft Subsequent Environmental Impact Report (SEIR) for the Firestone Education Center Master Plan; located in the South Gate area; Los Angeles County, California.
LETTER 2

February 3, 2014

State of California
Native American Heritage Commission
Dave Singleton, Program Analyst
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691

Response 2-1

This comment includes recommendations for compliance with the provisions of CEQA and ways mitigate project-related impacts on archaeological resources. As discussed in Section 4.3 Cultural Resources of the Subsequent Draft EIR, a cultural resources record check conducted for the project site concluded that there are no archaeological sites located within the project area. The records, literature search, and surveys revealed a low sensitivity for historic-period and prehistoric archaeological resources in the project area. Additionally, the NAHC was consulted as a means of determining the presence of Native American resources on the project site. A record search of the sacred lands file was conducted by the NAHC, and it did not indicate the presence of Native American cultural resources in the immediate project area. Regardless, because there is always a possibility that archaeological resources or human remains could be encountered during earth moving activities, Mitigation Measures CR3 and CR6 have been identified. These mitigation measures establish protocols in the event that archaeological resources or human remains are discovered during ground-disturbing activities. The identified mitigation measures are consistent with the recommendations in this comment letter.
March 6, 2014

Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Re: Firestone Education Center Mater Plan
Draft Environmental Impact Report (DEIR)
SCH#2010121044, IGR No: 140134/EA
Vic: LA / 710 / PM 18.314

Dear Mr. Hall,

The California Department of Transportation (Caltrans) has reviewed the transportation/traffic section of subsequent DEIR dated January 2014 for the proposed Firestone Education Center Mater Plan. The proposed project consists of the construction and operation of a new education center that would replace the existing South Gate Education Center to accommodate up to 9000 students. The proposed project includes demolition of existing building 4 and construction of a new parking structure to provide approximately 1,600 parking spaces. The project site is located on the northwest quadrant of the Firestone Boulevard and Santa Fe Avenue in the City of South Gate.

Based on a review of the Transportation/Traffic section included in the DEIR, Caltrans has the following comments:

Table 4.12-9 shows that the proposed project would generate a net increase of approximately 2780 daily vehicle trips with 289 occurring in the AM Peak Hour and 224 in the PM peak hour. According to the proposed project’s vehicle trip assignments in Figure 4.12-5, a net increment of 30 vehicles are assigned to I-710 southbound off-ramp to Firestone Boulevard during the AM peak hour and 18 during the PM peak hour. Table 4.12-11 shows that the I-710 southbound and northbound off-ramps to Firestone Boulevard are projected to deteriorate from level of service D and E in the existing 2012 scenario to level of service E and F in the 2031 with project scenario. Caltrans requests that mitigation improvements be included to address anticipated cumulative transportation impacts at this location. The proposed project may contribute to the funding of those improvements proportionally with its impacts.

The Traffic Impact Analysis (TIA) does not analyze the storage capacity for left turn pockets at on-ramps and at off-ramps to and from I-710 in either direction at Firestone Boulevard. Caltrans requests that the TIA evaluate whether existing storage capacity at these locations is adequate to accommodate projected cumulative traffic demand. Please include mitigation improvements if the current storage capacity is projected to be exceeded. Please follow Highway Capacity Manual methodology of queuing analysis.

"Caltrans improves mobility across California"
Mr. Thomas Hall  
March 6, 2014  
Page 2 of 2

The TIA states that the proposed project does not assign 150 vehicle trips to I-710 and therefore according to the Los Angeles Congestion Management Program, no analysis is required. Thus, the TIA does not provide information as to current and future operations of I-710. Metro and Caltrans along with the ports and other local organization are planning to improve the I-710 Corridor from Ocean Boulevard to SR-60 to address current and projected traffic congestion. Comprehensive Improvements are planned to the Firestone Boulevard interchange as part of the I-710 Corridor; however they are still in the planning stage. Caltrans recommends the following interim improvements at this location: Modify signals at ramps, install bicycle detection, and upgrade ramps to meet latest requirements of the Americans with Disabilities Act (ADA). Caltrans requests early coordination of any mitigation improvements on State highway facilities, as they would require an encroachment permit from it.

Caltrans acknowledges and agrees with the proposed Transportation Demand Management (TDM) program (TT4). The TDM program includes the following elements: (a) internet-based and independent study classes which allow for a portion or all of the education activities to occur without students and faculty needing to be physically on-site, (b) East Los Angeles College (ELAC) plans to offer free or discounted public transit coordination with various transit providers for all students and staff, and (c) In cooperation with other transit agencies and the City of South Gate, ELAC shall seek to improve existing bus stops with enhanced shelters and transit information with the immediate vicinity of the Firestone Education Center campus. Caltrans requests the City and District monitor the success of the TDM program and resultant effects to the freeway system.

Finally, we note that construction may involve the transportation of contaminated soils. Please require the project obtain required transportation permits for hauling excavated contaminated soils.

If you have any questions regarding our comments, you may contact me or Elmer Alvarez, project coordinator at (213) 897 – 6696 or electronically at Elmer_Alvarez@dot.ca.gov. Please refer to record number 140134/EA.

Sincerely,

DIANNA WATSON  
IGR/CEQA Branch Chief  
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

“Caltrans improves mobility across California”
LETTER 3

March 6, 2014

State of California
Department of Transportation
Dianna Watson, IGR/CEQA Branch Chief
District 7, Office of Transportation Planning
IGR/CEQA Branch
100 Main Street, MS # 16
Los Angeles, CA 90017

Response 3-1

This comment contains introductory remarks, and no response is necessary.

Response 3-2

As discussed in Section 4.12 Transportation and Traffic of the Subsequent Draft EIR, the cumulative transportation impacts at the I-710 Freeway Southbound and Northbound Off-Ramps to Firestone Boulevard, referred to in this comment, were analyzed (Intersection No. 30: I-710 Freeway Southbound Ramps/Firestone Boulevard and Intersection No. 31: I-710 Freeway Northbound Ramps/Firestone Boulevard). These intersections are located within the City of South Gate, and as such the City’s adopted significant impact threshold criteria were employed in the traffic analysis. The traffic study analyzed future cumulative conditions without the project (i.e., Year 2031 Without Project scenario, which includes ambient traffic growth and traffic that could be generated by the related projects) and with the project (i.e., Year 2031 With Project scenario, which includes ambient traffic growth, traffic that could be generated by the related projects and the proposed project). It was concluded that the proposed project’s contribution to the cumulative conditions at these intersections would be less than significant. The City of South Gate only requires the mitigation of transportation impacts when traffic generated by a project results in an increase in the volume-to-capacity (V/C) ratio equal to or greater than 0.02 for level of service (LOS) E or F. Therefore, while the LOS at these locations would deteriorate incrementally, as noted in the comment, no significant transportation impact would occur. Specifically, traffic generated from the proposed project would result in a V/C ratio increase of 0.011 and 0.005 at the I-710 Freeway Southbound Off-Ramp to Firestone Boulevard in the AM and PM peak hours, respectively. Similarly, at the I-710 Northbound Off-Ramp to Firestone Boulevard, the V/C ratio would increase 0.002 and 0.001 in the AM and PM peak hours, respectively. These increases in V/C ratio are not considered significant as they remain below the City’s impact threshold criterion of an increase in the V/C ratio of 0.02 or greater at LOS E or F operations.

The comment also acknowledges that Los Angeles County Metropolitan Transportation Authority (Metro) is currently preparing the I-710 Corridor Project EIR/EIS in coordination with California Department of Transportation (Caltrans), the ports and other local organizations. The purpose of the project is to address current and future (Year 2035) operating conditions and congestion along the I-710 Freeway from Ocean Boulevard to SR-60. It is important to note that this study already reports deficient existing operating conditions at both the I-710 Freeway Southbound and Northbound Ramp intersections. Both of these ramp intersections were shown to be operating at LOS E during the PM peak hour. The environmental review process is underway for the corridor project and several improvement alternatives have also been identified that are expected to improve operations to an acceptable LOS (LOS D or better). The Metro study also has taken into account cumulative (Year 2035) traffic conditions which are based on the corresponding socio-economic forecasts and regional modeling efforts.

Therefore, as the proposed project would not result in a cumulatively considerable transportation impact, the request for mitigation measures at these already deficient ramp intersections is not warranted.
Response 3-3

This comment requests an evaluation of the existing storage for left-turn pockets at on-ramps and off-ramps to and from the I-710 Freeway at Firestone Boulevard in order to determine if the available storage is adequate to accommodate the projected cumulative traffic demand. The comment suggests that mitigation improvements be identified if capacity is projected to be exceeded and recommends the analysis follow the Highway Capacity Manual (HCM) methodology for queuing analyses. As shown in Figure 4.12-5 of the Subsequent Draft EIR, the proposed project is not expected to result in any left-turn traffic movements at the I-710 Freeway Southbound Off-Ramp at Firestone Boulevard due to the fact that the proposed project is located between 2.5 and 3 miles west of the I-710 Freeway. The proposed project, however, is expected to nominally increase the left-turn volume at the I-710 Freeway Northbound Off-Ramp at Firestone Boulevard (i.e., an increase of two vehicles during both the AM and PM peak hours). In addition, there are no left-turn traffic movements to access either the Northbound or Southbound I-710 Freeway On-Ramps from Firestone Boulevard, as entering freeway volumes are accommodated via right-turn (i.e., non-critical) turning movements.

In response to this comment, a supplemental freeway ramp queuing analysis has been prepared for the I-710 Freeway Northbound and Southbound Off-ramps corresponding to the Year 2031 cumulative conditions. The queuing analyses, which are based on the HCM signalized methodology, were prepared to determine if the forecasted AM and PM peak hour traffic volumes exiting the I-710 Freeway at these two study intersections would queue back into the freeway mainline travel lanes. Table 2-1 includes the results of this queuing analysis, and shows that adequate storage is provided for the Year 2031 cumulative traffic conditions at both the I-710 Freeway Southbound and Northbound Off-Ramps at Firestone Boulevard during the AM and PM peak hours, as approximately 2,850 feet and 2,520 feet of total storage is currently provided, respectively (as measured from the freeway gore area to the respective off-ramp approach limit lines at Firestone Boulevard).

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SB: Southbound  
NB: Northbound

Intersection queuing analysis based on the Highway Capacity Software (HCS).
(a) An average vehicle length of 25 feet is utilized.
Source: Linscott, Law & Greenspan, Engineers, Vehicle Queuing Analysis, 2013 Firestone Education Center, March 19, 2014. Refer to Subsequent Final EIR Appendix A.

As discussed in Response 3-2 above, the analysis of cumulative transportation impacts determined that, while the level of service at these intersections could be expected to continue to be deficient in the future, the proposed project’s contribution to transportation impacts at these intersections would not be cumulatively considerable and would be less than significant. Therefore, based on results of the supplemental freeway ramp queuing analysis (which concluded that adequate ramp storage exists to accommodate Year 2031 cumulative traffic volumes), the determination of no significant project-related traffic impacts and in light of
the regional Metro/Caltrans I-710 Corridor Project EIR/EIS study currently underway, the request for mitigation measures is not warranted.

Response 3-4

As noted in the comment, the Los Angeles Congestion Management Program (CMP) guidelines only require that freeway monitoring locations to be examined if a project adds 150 or more trips (in either direction) during either the weekday AM or PM peak hours. The proposed project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to the CMP freeway monitoring locations. The proposed project would only result in a net increment of 30 vehicles assigned to the I-710 Freeway Southbound Off-Ramp to Firestone Boulevard during the AM peak hour and 18 vehicles during the PM peak hour (via right-turns). Please refer to Responses 3-2 and 3-3 for further discussion of the supplemental ramp queuing analyses that have been prepared as part of this Subsequent Final EIR and the conclusion that adequate ramp storage exists to accommodate the forecast Year 2031 cumulative AM and PM peak hour traffic volumes. As the proposed project would not result in a cumulatively considerable transportation impact, the request for mitigation measures interim or otherwise is not warranted.

Response 3-5

This comment concurs with the Transportation Demand Management (TDM) program mitigation measure identified in the Subsequent Draft EIR and requests that LACCD monitor the success of the program and resultant effects to the freeway system. LACCD intends to implement a TDM program and will monitor the effectiveness of the various measures identified to decrease the number of vehicular trips generated by persons traveling to and from the project site.

Response 3-6

This comment contains closing remarks and states that if construction activities involve the transportation of contaminated soils, LACCD shall obtain the necessary transportation permits. In the event that construction requires the removal of contaminated soil from the project site, a mitigation measure has been included that requires LACCD to coordinate with California Department of Toxic Substances Control (DTSC), and any required transportation permits would be obtained.
March 13, 2014

Mr. Thomas Hall
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, California 90017

Dear Mr. Hall:

Re: SCH 2010121044, LACCD 2013 Firestone Education Center Master Plan, SEIR

The California Public Utilities Commission (Commission) has jurisdiction over the safety of highway-rail crossings (crossings) in California. The California Public Utilities Code requires Commission approval for the construction or alteration of crossings and grants the Commission exclusive power on the design, alteration, and closure of crossings. The Commission’s Rail Crossings Engineering Section (RCES) is in receipt of the Draft Supplemental Environmental Impact Report (SEIR) for the proposed Los Angeles Community College District (LACCD) 2013 Firestone Education Center Master Plan project from the State Clearinghouse.

According to the SEIR, the project consists of construction and operation of a new LACCD satellite community college campus for up to 9,000 students. A new parking structure would be constructed in the northeast corner of the site and new traffic signals would be installed at the proposed Santa Fe Avenue driveway opposite Ardmore Avenue. The site is bounded by the Union Pacific Railroad Company (UPRR) rail track on the north, Santa Fe Avenue on the east and Firestone Boulevard on the south. Across Santa Fe Avenue from the site, Ardmore Avenue is immediately south of the UPRR right of way (ROW). The Santa Fe Avenue crossing (CPUC No. 001BK-489.60 and DOT No. 748086F) is adjacent to the northeast corner of the site.

Any development adjacent to or near the shared railroad/light rail right-of-way should be planned with the safety of the rail corridor in mind. New developments may increase traffic volumes not only on streets and at intersections, but also at at-grade highway-rail crossings. Language should be in place so that any traffic impact studies undertaken should also address rail crossing safety analysis and associated proposed mitigation measures. Safety analysis should include queuing on tracks, pedestrian movements, turning movements and sightlines. Additional safety improvement measures may include the planning for grade separations for major thoroughfares, improvements to existing at-grade highway-rail crossings due to increase in traffic volumes (e.g., addition or upgrade of crossing warning devices, active and passive signs, and channelization fencing).

As part of the project, RCES recommends at a minimum the following safety improvements at the project site and the Santa Fe Avenue crossing:
• Install continuous vandal resistant fencing (or other appropriate barriers) on the project area bordering the UPRR rail track to prevent unauthorized entry into the railroad ROW and to minimize the potential noise impact caused by the train horns and traffics;

• Install sidewalk passages at the crossing;

• Install traffic system preemption for the crossing and Ardmore Avenue;

• Install Americans with Disabilities Act (ADA) compliant standard detectable warning tactile strips on all pedestrian approaches to the crossing, either 12 feet away from the track or two (2) feet away from the Commission Standard 9 warning devices, whichever is further away from the track; and

• Install two (2) edge-line stripes for each sidewalk passage at the crossing.

In addition, any modification to the existing crossing requires authorization from the Commission. RCES representatives are available for consultation on any potential safety impacts or concerns on the adjacent or nearby crossing. The LACCD shall also arrange a diagnostic meeting with Los Angeles County Public Works Department, UPRR and RCES staff to discuss relevant safety issues and requirements for authorization to alter the existing at-grade crossing as necessary. Please continue to keep RCES informed of the project’s development. More information can be found at: http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/index.htm.

If you have any questions, please contact Ken Chiang at 213-576-7076, email at ykc@cpuc.ca.gov, or Jose Pereyra at (213) 576-7083, email jose.pereyra@cpuc.ca.gov.

Sincerely,

Ken Chiang, P.E.
Utilities Engineer
Rail Crossings Engineering Section
Safety and Enforcement Division

CC: State Clearinghouse
LETTER 4

March 13, 2014

State of California
Public Utilities Commission
Ken Chiang, P.E., Utilities Engineer
Rail Crossings Engineering Section, Safety and Enforcement Division
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Response 4-1

This comment contains introductory remarks and states that the CPUC requires approval for the design, construction and alteration of rail crossings. The comment further indicates that the project site is located adjacent to the Union Pacific Railroad Company (UPRR) Santa Fe Avenue rail crossing. No response to this comment is necessary.

Response 4-2

This comment states that any development located adjacent to or near shared railroad/light rail right-of-way should be planned with the safety of the rail corridor in mind and identifies recommended improvements for the Santa Fe Avenue crossing. As mentioned above, the Santa Fe Avenue crossing is adjacent to the northeast corner of the project site, and Ardmore Avenue is immediately south of the UPRR right-of-way. Mitigation Measure TT1 requires LACCD to install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage at the intersection of Ardmore and Santa Fe Avenues. The outbound (i.e., exiting Firestone Education Center (FEC) traffic) travel lanes would be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists would be provided. With the two inbound lanes proposed at this driveway, vehicular queuing back out onto Santa Fe Avenue towards the UPRR right-of-way (i.e., north of the driveway) is not anticipated. Furthermore, it is anticipated that the majority of project traffic utilizing the proposed driveway on Santa Fe Avenue will originate from and be destined to the south, based on a detailed review of the existing South Gate Education Center student population zip code data and the locations of surrounding major traffic corridors. Nonetheless, when the formal signal design process is initiated, the necessary coordination with the CPUC and/or UPRR will occur, and it is acknowledged that the following safety improvements may be incorporated into the design:

- Install continuous vandal resistant fencing (or other appropriate barriers) on the project area bordering the UPRR rail track to prevent unauthorized entry into the railroad right-of-way and to minimize the potential noise impact caused by the train horns and traffics;
- Install sidewalk passages at the crossing;
- Install traffic system preemption for the crossing and Ardmore Avenue;
- Install Americans with Disabilities Act (ADA) compliant standard detectable warning tactile strips on all pedestrian approaches to the crossing, either 12 feet away from the track or two feet away from the Commission Standard 9 warning devices, whichever is further away from the track; and
- Install two edge-line stripes for each sidewalk passage at the crossing.

Response 4-3

This comment reiterates that any modifications to the existing crossing requires authorization from the CPUC and suggests that LACCD arrange a diagnostic meeting with the Los Angeles County Public Work Department and UPRR and CPUC staff to discuss relevant safety issues and requirements. As discussed above, when the formal signal design process is initiated, the necessary coordination will occur and safety improvements will be discussed and addressed as part of the traffic signal pre-design coordination effort.
February 13, 2014

Thomas Hall, Director
Los Angeles Community College District
Facilities Planning and Development
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

Dear Mr. Hall:

SUBSEQUENT DRAFT ENVIRONMENTAL IMPACT REPORT, "THE 2013 FIRESTONE EDUCATION CENTER MASTER PLAN," IT CONSISTS IF THE CONSTRUCTION AND OPERATION OF A NEW LOS ANGELES COMMUNITY COLLEGE DISTRICT SATELLITE CAMPUS, 2525 FIRESTONE BOULEVARD, SOUTH GATE (FFER #201400014)

The Subsequent Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

4.11 PUBLIC SERVICES

Table 4.11-2: EQUIPMENT AND STAFFING OF FIRE STATIONS SERVING THE PROJECT SITE

The staffing on the two-person paramedic squad at Fire Station 54 should be corrected two fire fighter paramedics only.

Paragraphs 3, 4 and 5 should be corrected/updated as follows:

Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2013, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:
emergency response time of approximately 4:43 minutes and 7:30 minutes, respectively. Station 16 responded to 3,924 incidents during that time period, of which, 85 were fire related, 3,312 were emergency medical incidents, and 527 were other types.

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southwest southeast of the project site. In 2013, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:10 minutes and 5:44 minutes, respectively. Fire Station 147 responded to 2,849 incidents during that time period, of which, 49 were fire related, 2,462 were emergency medical incidents, and 338 were other types.

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2013, Fire Station 54 met the LACFD response time guidelines with an average emergency and nonemergency response time of approximately 4:59 minutes and 6:48 minutes, respectively. Fire Station 54 responded to 2,942 incidents during that time period, of which, 96 were fire related, 2,559 were emergency medical incidents, and 267 were other types.

**LAND DEVELOPMENT UNIT:**

1. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

3. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

4. Fire sprinkler systems are required in some residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.
5. The development may require fire flows up to 8,000 gallons per minute at 20 pounds per square inch residual pressure for up to a four-hour duration, as outlined in the 2012 County of Los Angeles Fire Code, Appendix B, Table BB105.1. Final fire flows will be based on the size of buildings, its relationship to other structures, property lines, and types of construction used.

6. Fire hydrant spacing shall be based on fire flow requirements, as outlined in the 2002 County of Los Angeles Fire Code Appendix III-BB. Additional hydrants will be required if hydrant spacing exceeds specified distances.

7. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

8. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.

9. Driveway width for non-residential developments shall be increased when any of the following conditions will exist:
   a) Provide 34 feet in-width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure.
   b) Provide 42 feet in-width, when parallel parking is allowed on each side of the access roadway/driveway.
   c) Any access way less than 34 feet in-width shall be labeled "Fire Lane" on the final recording map, and final building plans.
   d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use.

10. Notify the County of Los Angeles Fire Department, Fire Stations 16: (323) 585-5002, FS147: (310) 603-5255, and FS 54: (323) 567-8580, at least three days in advance of any street closures that may affect Fire/Paramedic responses in the area.

11. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.

12. The County of Los Angeles Fire Department, Land Development Unit's comments are only general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
13. Submit three sets of water plans to the County of Los Angeles Fire Department, Land Development Unit. The plans must show all proposed changes to the fire protection water system, such as fire hydrant locations and main sizes. The plans shall be submitted through the local water company.

14. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or at nrodeheffer@fire.lacounty.gov.

15. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division, have been addressed.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The project site formerly Firestone Tire and Rubber Plan is under oversight of the Department of Toxic Substances Control (DTSC) for mitigation of soil and groundwater contamination. Approval of DTSC is required prior to disturbance and grading of the soils.

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

Very truly yours,

FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl
LETTER 5

February 13, 2014

County of Los Angeles Fire Department
Frank Vidalez, Chief, Forestry Division, Prevention Services Bureau
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Response 5-1

As requested in this comment the following text on page 4.11-3 of the Subsequent Draft EIR has been revised:

<table>
<thead>
<tr>
<th>Fire Station</th>
<th>Equipment</th>
<th>Staffing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire Station 16</td>
<td>Four-Person Engine</td>
<td>1 Captain, 1 Firefighter Specialist, 1 firefighter, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Three-Person Engine</td>
<td>1 Captain, 1 Firefighter Specialist, 1 firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>2 Firefighter Paramedics</td>
</tr>
<tr>
<td>Fire Station 147</td>
<td>Four-Person Quint 1/a/</td>
<td>1 Captain, 1 Firefighter Specialist, 1 firefighter, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>2 Firefighter Paramedics</td>
</tr>
<tr>
<td>Fire Station 54</td>
<td>Four-Person Engine</td>
<td>1 Captain, 1 Firefighter Specialist, 1 firefighter, 1 Firefighter</td>
</tr>
<tr>
<td></td>
<td>Two-Person Paramedic Squad</td>
<td>1 Captain, 1 Firefighter Specialist, 1 Firefighter, 1 Firefighter</td>
</tr>
</tbody>
</table>

1/a A quint is a combination engine/ladder truck apparatus.


Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2012, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:38 minutes and 5:36 minutes, respectively. Fire Station 16 responded to 3,782 incidents during that time period, of which, 80 were fire related, 3,164 were emergency medical incidents, and 538 were other types.

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southeast of the project site. In 2012, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:07 minutes and 5:10 minutes, respectively. Fire Station 147 responded to 2,849 incidents during that time period, of which, 78 were fire related, 2,586 were emergency medical incidents, and 491 were other types.

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2012, Fire Station 54 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 5:03 minutes and 6:25 minutes, respectively. Fire Station 54 responded to 2,942 incidents during that time period, of

Ibid.

Los Angeles County Fire Department. Written Comments on the Subsequent Draft Environmental Report for the 2013 Firestone Education Center Master Plan from Frank Vidales, Chief Forestry Division, Prevention Services Bureau. February 13, 2014.
which, 103 96 were fire related, 2,587 2,559 were emergency medical incidents, and 347 287 were other types.\(^5\)

**Response 5-2**

The Los Angeles County Fire Department (LACFD) Land Development Unit identifies general fire and life safety requirements that may be applicable to the proposed project in this comment. The proposed project would be required to comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. As stated in this comment, specific fire and life safety requirements set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Additional requirements may be identified once the official plans are submitted for review. As called for in this comment, three sets of the project’s water plans that identify all proposed changes to the fire protection water system shall be submitted through the local water company to the LACFD, Land Development Unit.

**Response 5-3**

This comment expresses that all areas germane to the statutory responsibilities of the LACFD, Forestry Division have been addressed in the Subsequent Draft EIR.

**Response 5-4**

The LACFD Health Hazardous Materials Division states that approval of the Department of Toxic Substances and Control (DTSC) is required prior to disturbance and grading of soils at the project site. As discussed on page 4.6-6 of the Subsequent Draft EIR, DTSC issued a “No Further Action” letter deeming the project site suitable for unrestricted use on September 3, 2009. Although a “No Further Action” letter was issued for the project site, in January 2013, LACCD entered into a Voluntary Cleanup Agreement with the DTSC pursuant to the California Health and Safety Code which authorizes DTSC to oversee the investigation and remediation of the release or threatened release of any hazardous substances at or from the project site. Approval of the DTSC prior to disturbance and grading of soil will be obtained.

\(^\text{iibid.}\)
February 24, 2013

Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA 90017

RE: Firestone Education Center Master Plan

Dear Mr. Hall:

Thank you for the opportunity to comment on the proposed Firestone Education Center Master Plan at 2525 Firestone Boulevard. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues in relation to the proposed project that are germane to our agency’s statutory responsibility as well as our facilities and services.

Our agency submitted a letter at the time of the Notice of Preparation (NOP), which detailed the State requirements for Congestion Management Program (CMP) analysis. We appreciate the careful analysis that has been performed in the Draft EIR.

In addition, it is noted that Metro bus lines operate on Firestone Boulevard and Santa Fe Avenue, adjacent to the proposed project. Two Metro bus stops are directly adjacent to the proposed project. The following comments relate to bus operations and the bus stop:

1. Although the project is not expected to result in any long-term impacts on transit, the developer should be aware of the bus facilities and services that are present. The existing Metro bus stops must be maintained as part of the final project.

2. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. (For closures that last more than six months, Metro’s Stops and Zones Department will also need to be notified at 213-922-5190). Other municipal bus may also be impacted and should be included in construction outreach efforts.

3. LACMTA encourages the installation of bus shelters, benches and other amenities that improve the transit rider experience. The City should consider requesting the installation of such amenities as part of the development of the site.

4. Final design of the bus stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA) compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development.
LACMTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. Please send the Final EIR to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

Nick Saponara
Development Review Manager, Countywide Planning
LETTER 6

February 24, 2014

Los Angeles County Metropolitan Transportation Authority
Nick Saponara, Development Review Manager, Countywide Planning
One Gateway Plaza
Los Angeles, CA 90012-2952

Response 6-1

This comment contains introductory remarks, and Metro expresses their appreciation of the congestion management program (CMP) analysis conducted as part the Subsequent Draft EIR. No response is necessary.

Response 6-2

This comment relates to Metro bus operations and bus stops. Two Metro bus stops are located directly adjacent to the project site. The existing westbound bus stop on Firestone Boulevard just west of Santa Fe Avenue would not be affected by either construction or operation of the proposed project. However, the southbound Santa Fe Avenue bus stop would be temporarily relocated during construction and permanently relocated prior to operation of the FEC. Additionally, Mitigation Measure TT3, which is necessary to mitigate impacts to the intersection of Firestone Boulevard and Santa Fe Avenue, calls for the relocation of the existing eastbound Firestone Boulevard bus stop just west of Santa Fe Avenue to be located just east of Santa Fe Avenue. Prior to construction of the proposed project, LACCD will coordinate with Metro regarding the relocation and design of these bus stops and approval would be obtained. Bus stops and routes would be maintained during both construction and operation of the proposed project. The final design of the bus stops and surrounding sidewalk area would be compliant with the American Disabilities Act and allow passengers with disabilities a clear path of travel to the bus stop from the FEC.

Response 6-3

This comment solicits questions on the commenter letter and requests that the Subsequent Final EIR be sent to Metro for review. No response is necessary.
Mr. Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017  

Dear Mr. Hall:

2013 Firestone Education Center Master Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Subsequent Draft Environmental Impact Report for the subject project on January 17, 2014. The proposed development is located within the jurisdictional boundaries of District No. 1. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated January 10, 2013 (copy enclosed) still apply to the subject project with the following updated information.

2. The 18-inch diameter Mountain View-Belle Vernon Relief Extension Trunk Sewer conveyed a peak flow of 0.2 million gallons per day (mgd) in 2013.

3. The Joint Water Pollution Control Plant currently processes an average flow of 263.2 mgd.

4. The expected increase in average wastewater flow from the project site is 174,486 gallons per day.

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

Very truly yours,

Grace Robinson Hyde

Adriana Raza  
Customer Service Specialist  
Facilities Planning Department

AR:ar

Enclosure

cc: M. Tremblay  
J. Ganz
Mr. Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017  

Dear Mr. Hall:

The Revised Firestone Education Center Master Plan

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on December 14, 2012. The proposed development is located within the jurisdictional boundaries of District No. 1. We offer the following comments regarding sewerage service:

1. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the Districts, for conveyance to the Districts’ Mountain View-Belle Vernon Relief Extension Trunk Sewer, located in Truba Avenue at Missouri Avenue. This 18-inch diameter trunk sewer has a design capacity of 1.7 million gallons per day (mgd) and conveyed a peak flow of 1.3 mgd when last measured in 2009.

2. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a design capacity of 400 mgd and currently processes an average flow of 265.7 mgd.

3. In order to estimate the volume of wastewater the project will generate, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts’ Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. 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 a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design 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 CAA. 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 you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you 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,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

c: M. Tremblay
   J. Ganz
LETTER 7

March 3, 2014

County Sanitation Districts of Los Angeles County
Adriana Raza, Customer Service Specialist, Facilities Planning Department
1955 Workman Mill Road
Whittier, CA 90601-1400

Response 7-1

This comment letter clarifies that previous comments submitted by the LACSD still apply to the proposed project with identified updates. In response to this comment, the following text in Section 4.13 Utilities and Service Systems, Wastewater of the Subsequent Draft EIR has been revised.

- Subsequent Draft EIR page 4.13-9, Wastewater Treatment heading, fourth sentence:
  The JWPCP has a design capacity of 400 million gpd and provides both primary and secondary treatment for approximately currently processes an average flow of 225 263.2 million gpd of wastewater.

- Subsequent Draft EIR page 4.13-9, Wastewater Conveyance Infrastructure heading, last sentence:
  The Mountain View-Belle Vernon Relief Extension Trunk Sewer is an 18-inch pipe with a design capacity of 1.9 million gpd and conveyed a peak flow of 1.3 0.2 million gpd in 2009 2013.

- Subsequent Draft EIR page 4.13-11, Wastewater Treatment heading, last sentence and Table 4.13-7:
  As shown in Table 4.13-7, the proposed project is estimated to increase wastewater generation by 180,000 approximately 175,270 gpd when operating at maximum enrollment capacity.

<table>
<thead>
<tr>
<th>Use</th>
<th>Quantity</th>
<th>Units</th>
<th>Wastewater Generation Rate (gpd/unit) 1/a/</th>
<th>Wastewater Generation (gpd)</th>
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<tbody>
<tr>
<td>Proposed Firestone Education Center</td>
<td>9,000</td>
<td>students</td>
<td>20</td>
<td>180,000</td>
</tr>
<tr>
<td>Building 4 – Warehouse (to be demolished)</td>
<td>189,212</td>
<td>square feet</td>
<td>0.025</td>
<td>-4,730.30</td>
</tr>
<tr>
<td><strong>Net Increase in Wastewater Generation at the Project Site</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>175,289.70</strong></td>
</tr>
</tbody>
</table>

1/a/ Wastewater generation rates were obtained from the Sanitation Districts of Los Angeles County, Table 1: Loadings for Each Class of Land Use, which is available at http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3531.

March 13, 2014

Mr. Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Boulevard, 6th Floor  
Los Angeles, CA 90017

SUBSEQUENT DRAFT ENVIRONMENTAL IMPACT REPORT (SDEIR)  
2013 FIRESTONE EDUCATION CENTER (FEC) MASTER PLAN  
LOS ANGELES COMMUNITY COLLEGE DISTRICT (LACCD)  
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORK COMMENTS

Thank you for the opportunity to review the SDEIR for the 2013 FEC Master Plan. This report will update the East Los Angeles Firestone Education Center Final EIR (2009 Final EIR) adopted in December 2009, which allowed the LACCD to acquire the project site with the intent of relocating and expanding the South Gate Education Center (SGEC). The FEC would accommodate approximately 9,000 students.

The proposed project includes the demolition of the 220,550 square-foot Building 4 and its connections to Building 3, and the construction of a new 100,000 square-foot building and approximately 1,600-space parking structure. Additionally, the project site would be improved with an approximately 60-space surface parking lot, landscaping, an open space area, and other outdoor recreational amenities.

The following County of Los Angeles, Department of Public Works comments are for your consideration.

Geology and Soils – Section 4.4

1. The SDEIR has not adequately addressed liquefaction and its potential effects on the proposed development. A soils report which addresses liquefaction along with any other geologic hazards and recommends any necessary mitigation measures shall be included in the final EIR.

For questions regarding the geology and soils comment, please contact Jeremy Wan of Geotechnical and Materials Engineering Division at (626) 458-7980 or jwan@dpw.lacounty.gov.
Transportation and Traffic – Section 4.12

1. Public Works concurs with the findings of the SDEIR regarding the traffic generated by the project and cumulative traffic of the project and other related projects in the area will significantly impact the following County intersections:

   a) Alameda Street at Nadeau Street
   b) Alameda Street at Firestone Boulevard
   c) Alameda Street at 92nd Street/Southern Avenue
   d) Pacific Boulevard at Broadway

   Additionally, Public Works concurs that there are no feasible physical mitigation measures and that the impacts at the above intersections will remain significant and unavoidable. We therefore recommend that the lead agency prepare a Statement of Overriding Considerations to establish the merits of the project despite its impacts to the County’s roadways and intersections.

For questions regarding the traffic comment, please contact Andrew Ngumba of Traffic & Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov

If you have any other questions or require additional information, please contact Juan Sarda of Land Development Division at (626) 458-4921 or jsarda@dpw.lacounty.gov.

JS:
LETTER 8

March 13, 2014

County of Los Angeles Department of Public Works
Juan Sarda, Land Development Division

Response 8-1

This comment contains introductory remarks, and no response is necessary.

Response 8-2

This comment states that the Subsequent Draft EIR does not adequately address liquefaction and recommends that a soils report, which addresses liquefaction along with other geological hazards and identifies mitigation measures, be included in the Subsequent Final EIR.

As discussed Section 4.4 Geology and Soils of the Subsequent Draft EIR, the proposed project is required to comply with all Field Act requirements. The Field Act, contained in the California Education Code Sections 17280, et. seq. for K–12 and 81130, et. seq. for community colleges, established the Division of the State Architect (DSA) which develops accessibility, structural safety, fire and life safety, and historical building codes and standards utilized in various public and private buildings throughout the State of California. The DSA also provides plan review and design and construction oversight for K–12 schools, community colleges, and various other state-owned and leased facilities. The Field Act imposes important requirements on California schools that are not present in other types of construction approval processes:

- Licensed design professionals must prepare drawings and specifications for proposed construction work;
- Drawings and specifications have to be verified by DSA for compliance with applicable building codes;
- The building codes utilized in the design of school buildings contain structural provisions superior to many other types of facilities, with consideration for known seismic activity in California;
- A project owner (school or community college district) must hire a DSA-certified inspector to oversee construction. The inspector selection must be approved by the design professionals and the DSA;
- Changes to approved drawings and specifications for DSA-regulated portions of the project shall be submitted and approved by DSA prior to commencement of work; and
- At the conclusion of construction, the design professionals, the inspector and the contractor shall file verified reports with DSA indicating the work has been performed in compliance with the approved plans and specifications.

Approval of a site-specific geotechnical report and liquefaction study (if determined necessary) by a DSA Building Official prior to issuance of a grading permit, as well as review and approval of all construction and design plans by the DSA would ensure that the proposed project complies with all applicable building codes and requirements, reducing impacts associated with geological hazards to the greatest extent feasible.

Response 8-3

This comment contains closing remarks and concurs with the conclusions in the Subsequent Draft EIR that there are no feasible mitigation measures to reduce the significant and unavoidable traffic impacts that have been identified at four county intersections. The comment further recommends that LACCD prepare a Statement of Overriding Considerations (SOC) to establish the merits of the proposed project despite the impacts to the County’s roadways and intersections. The comments are noted and will be forwarded to the decision-makers for their review and consideration prior to any approval or denial action being taken on the project.
March 3, 2014

Mr. Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Boulevard, 6th Floor
Los Angeles, CA  90017

Subject:  Comments on Firestone Education Center Master Plan Subsequent Draft Environmental Impact Report

Dear Mr. Hall:

The City of South Gate (City) appreciates the opportunity to review and comment on the Firestone Education Center Master Plan Subsequent Draft Environmental Impact Report (Subsequent DEIR) prepared by Terry A. Hayes Associates Inc. (TAHA) dated January 2014. As demonstrated by City staff in our meetings with the Los Angeles Community College District (LACCD) in October 2013, the City endeavors to be a partner in making the proposed Firestone Education Center (FEC) a success for both LACCD the as well as for the residents and students of the City and surrounding region.

The City has the following comments on the Subsequent DEIR:

1. On page 4.8-11 of the Subsequent DEIR, the discussion under subheading "Parking" briefly discusses the potential parking impacts associated with implementation of the proposed project. Based on the project description, the parking structure will be located on the most northerly end of the project site with the main access to be located at the intersection of Santa Fe Avenue at Ardmore Avenue, which is adjacent to the Union Pacific Railroad (UPRR) tracks.

However, the proposed project does not provide any additional details regarding the proposed layout of the parking spaces. It is important to have these details fully developed by the time LACCD applies for the General Order (GO) 88-B from the California Public Utilities Commission (CPUC) and UPRR to modify the existing railroad crossing. The CPUC and UPRR will generally be concerned about the design of the parking structure and parking layout in the immediate vicinity of said intersection because of potential queues
extending back to the intersection and railroad crossing created by drivers "waiting" for a parking spot. It is advisable that LACCD initiate discussions as soon as possible with the CPUC and UPRR regarding potential modifications to the existing railroad crossing.

Based on our meetings in October 2013, it is our understanding that the proposed parking structure will not be gated. However, because parking structure will be limited to two main access points, access to the parking structure may be difficult at times such that it may be more convenient for the students to park on City streets instead of parking in the parking structure and adversely impact parking to the neighboring residential neighborhood. As agreed to in the meetings of October 2013, the City and LACCD will work cooperatively together to address potential future parking impacts the FEC may have to the residential neighborhoods. Potential measures may need to include of the implementation of traffic calming measures in the residential neighborhoods.

2. On pages 4.12-41 and 42 of the Subsequent DEIR, the discussion under subheading "Public Transit, Bicycle, or Pedestrian Facilities" briefly discusses the potential impacts to pedestrian facilities only in general terms. As we discussed in the meetings of October 2013, the pedestrian travel patterns will become evident when the FEC opens and is fully operational. Consequently, the City and LACCD agreed to work cooperatively together to address future needs for pedestrian facilities.

3. On page 4.12-43 of the Subsequent DEIR, various improvement and cost sharing alternatives are provided for the intersection of Calden Avenue/Project Access at Firestone Boulevard. It should clarify that the proposed traffic signal improvements may also result in associated civil road improvements in the immediate vicinity of the intersection, which are unknown at this time because the design is not yet completed. These associated civil road improvements will be included as part of the cost sharing. Please also note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City. It is advisable that LACCD initiate detailed discussions with the City regarding the design of said improvements.

4. On page 4.12-44 of the Subsequent DEIR, Mitigation Measure TT1 should clarify that the proposed installation of a traffic signal for the intersection of Santa Fe Avenue at Ardmore Avenue/Project Access will also require the LACCD to obtain approvals from the CPUC and UPRR to modify the existing adjacent railroad crossing. Please also note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City. It is advisable that LACCD initiate detailed discussions with the City, the CPUC and UPRR regarding the design of said improvements.

5. On page 4.12-44 of the Subsequent DEIR, Mitigation Measure TT3 should clarify that the proposed relocation of the Los Angeles County Metropolitan Transportation Authority (Metro) bus stop on Firestone Boulevard is subject to the approval by Metro.

6. On page 4.12-46 of the Subsequent DEIR, a significant and unavoidable impact was identified for the intersection of Santa Fe Avenue at the Project Driveway/Ardmore Avenue. It is advisable that LACCD work cooperatively with the City to identify other potential
measures that could lessen the significant adverse impact. Please note that these proposed improvements will require LACCD to apply for an Encroachment Permit from the City.

The City appreciates the opportunity to provide comments on the Subsequent DEIR. If you have any questions or desire additional information, please contact me at (323) 563-9582.

Sincerely,

Nisha Patel, P.E.
Assistant City Engineer

cc: Michael Flad, City Manager
    David Torres, Interim Director of Public Works
    Steve Lefever, Director of Community Development
    Scott Ma, Hartzog & Crabill, Inc.
LETTER 9

March 3, 2014

City of South Gate, Public Works Field Operations
Nisha Patel, P.E., Assistant City Engineer
4244 Santa Ana Street
South Gate, CA 90280

Response 9-1

This comment contains introductory remarks, and no response is necessary.

Response 9-2

This comment relates to the proposed parking structure and the proposed layout of parking spaces. As suggested in this comment, LACCD will initiate discussions with the CPUC and the UPPR regarding potential modifications to the existing railroad crossing. The City and LACCD will work cooperatively together to address potential future parking impacts that the proposed project may have in residential neighborhoods as agreed upon.

Response 9-3

This comment relates to potential impacts to pedestrian facilities. As stated by the commenter, the City and LACCD will work cooperatively together to address future needs for pedestrian facilities based on pedestrian travel patterns when the Firestone Education Center opens and becomes fully operational as agreed upon.

Response 9-4

As discussed on page 4.12-43 of the Subsequent Draft EIR, application of the City of South Gate’s significant impact threshold criteria indicates that the proposed project is expected to result in incremental but not significant impacts at the intersection of Project Driveway-Calden Avenue/Firestone Boulevard. Even though no significant traffic impacts are identified at this intersection, the City of South Gate and LACCD have agreed to implement the joint traffic signal improvement integrating the project driveway into the approved Calden Avenue/Firestone Boulevard traffic signal under a single signal controller. As acknowledged in the comment, detailed design associated with the joint traffic signal has not yet been determined, including any potential civil-related improvements. Therefore, should this project be approved by the LACCD Board of Trustees and at such time when the formal traffic engineering design plan preparation effort is initiated, the appropriate coordination, including application for any required encroachment permits, will transpire with the City of South Gate.

Response 9-5

As discussed on page 79 of the Subsequent Draft EIR, Traffic Impact Study, should the proposed project be approved, the mitigation measure associated with the Santa Fe Avenue and Project Driveway/Ardmore Avenue intersection would need to be formally designed and constructed prior to occupancy of the project. At such time as the formal signal design process is initiated, the necessary coordination with the CPUC and/or UPRR will occur and details (i.e., such as the need for and design of traffic signal preemption given the proximity of the existing Santa Fe Avenue railroad crossing gates and control) will be discussed and addressed as part of the traffic signal pre-design coordination effort. In addition, the appropriate continued coordination, including application for any required encroachment permits, will transpire with the City of South Gate as part of the traffic engineering design plan preparation effort for the mitigation measure proposed at the intersection of Santa Fe Avenue/Project Driveway-Ardmore Avenue.
In response to this comment, Mitigation Measure TT1 has been revised as follows to provide clarification:

**TT1** LACCD shall install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage. The outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided. Approvals will be obtained from the California Public Utilities Commission, Union Pacific Railroad and the City of South Gate as required.

**Response 9-6**

Should the project be approved by the LACCD Board of Trustees, the appropriate coordination will transpire with Metro as part of the traffic engineering design plan preparation effort for the mitigation measures proposed at the intersection of Santa Fe Avenue and Firestone Boulevard, including the recommendation to relocate the existing eastbound near-side bus stop to a far-side bus stop.

In response to this comment, Mitigation Measure TT3 has been revised as follows to provide clarification:

**TT3** LACCD shall install eastbound and westbound exclusive right-turn only lanes. The existing eastbound and westbound combination through-right turn lanes shall be restriped to provide a 10-foot through lane with a 12-foot wide right-turn only lane for both the eastbound and westbound approaches. Up to two on-street parking spaces shall also be removed along the north and south sides of Firestone Boulevard. Additionally, LACCD shall coordinate with the City of South Gate regarding the proposed relocation of the existing eastbound near-side bus stop to a far-side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.

**Response 9-7**

The comment states that a significant and unavoidable impact was identified for the intersection of Santa Fe Avenue and Project Driveway/Ardmore Avenue. As a point of clarification, the Santa Fe Avenue intersection where a significant weekday PM peak hour traffic impact would remain significant and unavoidable in the year 2031 conditions is at the intersection of Santa Fe Avenue and Project Driveway/Orchard Place. Mitigation for this location consists of restriping the northbound and southbound approaches on Santa Fe Avenue to provide a northbound left-turn lane and a southbound left-turn lane. This improvement can be accommodated within the existing Santa Fe Avenue roadway width.

The City of South Gate requires that the level of service for one-way stop-controlled and two-way stop-controlled intersections be based solely on the worst case delays experienced on the minor street approach, regardless of whether a project would directly contribute traffic to that approach or not. For the subject intersection, the worst case minor street approach delay is expected to occur on westbound Orchard Place. Although the proposed northbound and southbound left-turn improvement can be considered feasible and appropriate in providing additional vehicular capacities to the intersection, from the City of South Gate’s unsignalized intersection calculation standpoint, it does not reduce the project’s significant traffic impact in the PM peak hour to a less than significant level (i.e., the delays for the westbound Orchard Place approach would remain the same with or without the recommended improvement).

The statement advising that LACCD continue to work cooperatively with the City to identify other potential measures that could lessen the significant adverse impact at this intersection is noted and will be carefully considered by the LACCD team.
The appropriate continued coordination, including application for any required encroachment permit, will transpire with the City of South Gate as part of the traffic engineering design plan preparation effort for the mitigation measures proposed at the intersection of Santa Fe Avenue/Project Driveway-Orchard Place.

Response 9-8

This comment contains closing remarks, and no response is necessary.
Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Blvd., 6th Floor  
Los Angeles, CA. 90017  
Date: February 8, 2014  

Dear Mr. Hall,

This project will bring hopes and opportunities for my children to improve their lives by obtaining a higher education which in turn affects their own lives as well as the lives of people around them.

We appreciate your hard work to bring this project to reality.

Sincerely,

Alfanzo Alarcon  
8913%  Tope Ave.,  
South Gate, CA. 90280
LETTER 10

February 8, 2014

Alfanzo Alacron
8919 ¾ Tope Avenue
South Gate, CA 90280

Response 10-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
Thomas Hall, Director  
Facilities Planning and Development  
Los Angeles Community College District  
770 Wilshire Blvd., 6th Floor  
Los Angeles, CA. 90017  
Date: February 3, 2014

Dear Mr. Hall,

This project provides opportunities and ways for my sons and daughters to improve their lives by obtaining a higher education which in turn affects their own lives as well as the lives of people around them.

We appreciate your hard work to bring this project to reality.

Sincerely,

[Signature]

Luisa Alonso  
8919 1/4 Tope Ave.,  
South Gate, CA. 90280
LETTER 11

February 3, 2014

Luisa Alonso
8919 ¼ Tope Avenue
South Gate, CA 90280

Response 11-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
Thomas Hall, Director
Facilities Planning and Development
Los Angeles Community College District
770 Wilshire Blvd., 6th Floor
Los Angeles, CA. 90017
Date: February 6, 2014

Dear Mr. Hall,

Thank you for providing a path way for me to continue my education in my neighborhood where I can be effective and improve my life by obtaining a higher education.

I appreciate your vision to make this project possible for young folks like me.

Sincerely,

Jose Luis Alonso
8919 ¾ Tope Ave.,
South Gate, CA. 90280
LETTER 12

February 6, 2014

Jose Luis Alonso
8919 ¼ Tope Avenue
South Gate, CA 90280

Response 12-1

The commenter’s support for the proposed project is noted for the record and will be forwarded to the decision-makers for their consideration.
3.0 CORRECTIONS AND ADDITIONS

As required by Section 15088 of the CEQA Guidelines, this section provides corrections or clarifications to the Subsequent Draft EIR. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the CEQA Guidelines. Corrections and Additions to the Subsequent Draft EIR are provided in underline or strikeout text as needed to indicate an addition or deletion, respectively.

SECTION 2.0 SUMMARY

- Subsequent Draft EIR page 2-6, Table 2-1, Mitigation Measures HM1, TT1 and TT3 revise as shown below under headings Section 4.6 Hazards and Hazardous Materials and Section 4.12 Transportation and Traffic.

SECTION 4.6 HAZARDS AND HAZARDOUS MATERIALS

- Subsequent Draft EIR page 4.6-14, Mitigation Measures HM1, revise as follows:

  HM1 Should LACCD encounter any previously unidentified contaminants requiring remediation during construction, an action plan shall be developed, approved by Department of Toxic Substances Control (DTSC) as appropriate, and implemented, prior to resuming in conjunction with construction activities in the contaminated area. As needed, the investigation and remediation of a release or threatened release of any hazardous substances at or from the project site can be overseen by the DTSC in accordance with the Voluntary Cleanup Agreement between DTSC and LACCD.

SECTION 4.11 PUBLIC SERVICES

- Subsequent Draft EIR page 4.11-3, revise as follows:

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<td>Two-Person Paramedic Squad</td>
<td>1 Captain, 1 Firefighter Specialist, 2 Firefighter Paramedics</td>
</tr>
</tbody>
</table>

/a/ A quint is a combination engine/ladder truck apparatus.

SOURCE: Los Angeles County Fire Department, Planning Division, email correspondence with Loretta Bagwell, Planning Analyst, January 31, 2013 and written comments on the Subsequent Draft Environmental Report for the 2013 Firestone Education Center Master Plan from Frank Vidales, Chief, Forestry Division, Prevention Services Bureau, February 13, 2014.
Fire Station 16 is located at 8010 South Compton Avenue in Florence, an unincorporated community of Los Angeles County, 1.3 miles northwest of the project site. In 2012-2013, Fire Station 16 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:38-4:43 minutes and 5:36-7:30 minutes, respectively. Fire Station 16 responded to 3,782-3,924 incidents during that time period, of which, 80-85 were fire related, 3,164-3,312 were emergency medical incidents, and 538-527 were other types.4

Fire Station 147 is located at 3161 East Imperial Highway in the City of Lynwood, 2.1 miles southwest southeast of the project site. In 2012-2013, Fire Station 147 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 4:07-4:10 minutes and 5:10-5:44 minutes, respectively. Fire Station 147 responded to 3,155-2,849 incidents during that time period, of which, 78-49 were fire related, 2,586-2,462 were emergency medical incidents, and 491-338 were other types.5

Fire Station 54 is located at 4867 Southern Avenue in the City of South Gate, 2.5 miles east of the project site. In 2012, Fire Station 54 met the LACFD response time guidelines with an average emergency and non-emergency response time of approximately 5:03-4:59 minutes and 6:25-6:48 minutes, respectively. Fire Station 54 responded to 3,037-2,942 incidents during that time period, of which, 103-96 were fire related, 2,587-2,559 were emergency medical incidents, and 347-287 were other types.6

SECTION 4.12 TRANSPORTATION AND TRAFFIC

- Subsequent Draft EIR page 4.12-44, Mitigation Measures TT1 and TT3, fourth sentence, revise as follows:

**TT1** LACCD shall install a traffic signal and construct two inbound travel lanes and two outbound travel lanes and associated roadway restriping and signage. The outbound (i.e., exiting FEC traffic) travel lanes shall be configured to provide a shared left/through lane and an exclusive right-turn only lane while two inbound travel lanes would be provided. In addition, adequate northbound left-turn storage along Santa Fe Avenue for entering (northbound) FEC motorists shall be provided. Approvals will be obtained from the California Public Utilities Commission, Union Pacific Railroad and the City of South Gate as required.

**TT3** LACCD shall install eastbound and westbound exclusive right-turn only lanes. The existing eastbound and westbound combination through-right turn lanes shall be restriped to provide a 10-foot through lane with a 12-foot wide right-turn only lane for both the eastbound and westbound approaches. Up to two on-street parking spaces shall also be removed along the north and south sides of Firestone Boulevard. Additionally, LACCD shall consider regarding the proposed relocation of the existing eastbound near-side bus stop to a far-side bus stop. The relocation of this bus stop is subject to approval by the County of Los Angeles Metropolitan Transportation Authority.

SECTION 4.13 UTILITIES AND SERVICE SYSTEMS

- Subsequent Draft EIR page 4.13-9, Wastewater Treatment heading, fourth sentence, revise as follows:

The JWPCP has a design capacity of 400 million gpd and provides both primary and secondary treatment for approximately currently processes an average flow of 275-263.2 million gpd of wastewater.

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2 *Ibid*.

3 *Ibid*.
• Subsequent Draft EIR page 4.13-9, Wastewater Conveyance Infrastructure heading, last sentence, revise as follows:

The Mountain View-Belle Vernon Relief Extension Trunk Sewer is an 18-inch pipe with a design capacity of 1.9 million gpd and conveyed a peak flow of 1.3 0.2 million gpd in 2009 2013.
### General Information
- **Analyst**: ACY
- **Agency or Co.**: LLG Engineers
- **Date Performed**: 3/19/2014
- **Time Period**: AM Peak Hour

### Site Information
- **Intersection**: 30. I-710 SB/Firestone
- **Area Type**: All other areas
- **Jurisdiction**: City of South Gate
- **Analysis Year**: Year 2031 Cumulative

### Volume and Timing Input

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### Lane Group Capacity, Control Delay, and LOS Determination

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### General Information

**Project Description**  
I-710 SB Ramps/Firestone Bl- 2031 Cumulative AM Peak Hour

### Average Back of Queue

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### Percentile Back of Queue (95th percentile)

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### Queue Storage Ratio

|                   |                   |                   |                   |                   |                   |
|-------------------|-------------------|-------------------|-------------------|-------------------|
| Queue Spacing     | 25.0              | 25.0              | 25.0              | 25.0              |
| Queue Storage     | 0                 | 0                 | 0                 | 960               |
| 960               |                   |                   |                   |                   |
| Average Queue Storage Ratio | 0.1 | 0.3 | 0.1 | 0.3 |
| 95% Queue Storage Ratio | 0.2 | 0.5 | 0.2 | 0.5 |
## General Information

- **Analyst**: ACY
- **Agency or Co.**: LLG Engineers
- **Date Performed**: 3/19/2014
- **Time Period**: PM Peak Hour

## Site Information

### Intersection
- **30. I-710 SB/Firestone**

### Area Type
- **All other areas**

### Jurisdiction
- **City of South Gate**

### Analysis Year
- **Year 2031 Cumulative**

## Volume and Timing Input

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### Timing

- **Duration of Analysis (hrs) = 0.25**
- **Cycle Length C = 100.0**

## Lane Group Capacity, Control Delay, and LOS Determination

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## General Information

### Project Description
I-710 SB Ramps/Firestone Bl- 2031 Cumulative PM Peak Hour

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## Percentile Back of Queue (95th percentile)

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### Lane Group Capacity, Control Delay, and LOS Determination

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## General Information

**Project Description**  I-710 NB Ramps/Firestone Bl- 2031 Cumulative AM Peak Hour

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### Queue Storage Ratio

| Queue Spacing | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| Queue Storage | 0 | 0 | 0 | 0 | 700 | 700 |
| Average Queue Storage Ratio | 0.2 | 0.1 |
| 95% Queue Storage Ratio | 0.4 | 0.3 |
### Site Information
- **Intersection**: 31. I-710 NB/Firestone
- **Area Type**: All other areas
- **Jurisdiction**: City of South Gate
- **Analysis Year**: Year 2031 Cumulative

### Volume and Timing Input

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### Lane Group Capacity, Control Delay, and LOS Determination

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**Duration of Analysis (hrs) = 0.25**

**Cycle Length C = 100.0**
## BACK-OF-QUEUE WORKSHEET

### General Information

**Project Description**  
I-710 NB Ramps/Firestone Bl- 2031 Cumulative PM Peak Hour

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<td>0.00</td>
<td>1.16</td>
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</tr>
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<td>I Factor</td>
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<td>1.00</td>
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<td>Arrival Type</td>
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<td>3</td>
<td>3</td>
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<tr>
<td>Platoon Ratio</td>
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<td>1.00</td>
<td>1.00</td>
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<tr>
<td>PF Factor</td>
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</tr>
<tr>
<td>Q1</td>
<td>23.6</td>
<td>34.5</td>
<td>0.0</td>
<td>12.2</td>
</tr>
<tr>
<td>Q2</td>
<td>5.1</td>
<td>26.4</td>
<td>0.0</td>
<td>2.4</td>
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<tr>
<td>Q Average</td>
<td>28.7</td>
<td>60.9</td>
<td>0.0</td>
<td>14.7</td>
</tr>
</tbody>
</table>

### Percentile Back of Queue (95th percentile)

| fB% | 1.6 | 2.1 | 1.5 | 2.1 | 1.8 | 1.8 |
| Back of Queue | 46.6 | 0.0 | 92.6 | 0.0 | 25.9 | 22.3 |

### Queue Storage Ratio

| Queue Spacing | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 | 25.0 |
| Queue Storage | 0 | 0 | 0 | 0 | 700 | 700 |
| Average Queue Storage Ratio | 0.5 | 0.4 |
| 95% Queue Storage Ratio | 0.9 | 0.8 |