

APPENDIX A

Notice of Preparation, Comment Letters, and Scoping Meeting Summary

APPENDIX A.1

Notice of Preparation



COMPTON UNIFIED SCHOOL DISTRICT

NOTICE OF PREPARATION

DATE: November 1, 2017

TO: See Attached Distribution List

FROM: Compton Unified School District

Facilities Department

429 South Oleander Avenue

Compton, CA 90220

Contact: Nathaniel Holt, Chief Facilities Officer

SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT

The Compton Unified School District (CUSD) as Lead Agency (per California Environmental Quality Act [CEQA] Guidelines Section 15052) has determined that an environmental impact report (EIR) should be prepared for the proposed Compton High School Reconstruction Project ("proposed Project") as described below. As part of the CEQA process, the CUSD solicits the views of your agency as to the scope and content of the environmental information that is applicable to your agency's responsibilities in connection with the proposed Project pursuant to the CEQA Guidelines Sections 21082.2(a) and (d).

PROJECT TITLE: Compton High School Reconstruction Project

PROJECT LOCATION: As shown in **Figure 1, Project Location Map**, the Project site is in the central portion of the City of Compton, approximately 1 mile north of State Route 91, 2 miles west of Interstate 710, 3 miles east of Interstate 110, and 2.5 miles south of Interstate 105. The Project site is generally bound by W. Myrrh Street to the north, S. Acacia Avenue to the east, W. Alondra Boulevard to the south, and Compton Creek to the west. The private street S. Oleander Avenue bisects the Project site, connecting to W. Myrrh Street on the north and W. Alondra Boulevard on the south.

PROJECT DESCRIPTION: CUSD is proposing to reconstruct the Compton High School (CHS) campus. The proposed Project would consist of the demolition of all existing buildings, facilities, and athletic fields, and the construction of new, modern buildings, facilities, and athletic fields with a design that supports a free-flowing campus. Implementation of the proposed Project would provide CUSD with the range of updated and modern school facilities for CHS to meet current standards and to meet the immediate and long-term educational needs of the community. The reconstructed campus would be able to accommodate a total of 2,500 seats.

The anticipated opening of the reconstructed CHS campus is by the 2021–2022 school year.

Two different development options have been identified for the proposed Project as follows:

Option A: Reconstruction within the Existing Campus Boundaries

As shown in **Figure 2, Conceptual Site Plan—Option A**, Option A of the proposed Project would consist of the demolition of all existing uses on the Project site and the reconstruction of the new campus facilities within the existing boundaries of the current CHS campus.

The reconstruction of the eastern portion of the Project site under Option A would include the construction of two 3-story academic buildings for a total of approximately 191,600 square feet; a 2-story, approximately 79,900-square-foot gymnasium and aquatic center; and a 1-story, approximately 14,900-square-foot administration building. The southeastern portion of the Project site would include a community park with a basketball court at Cocoa Street and Acacia Avenue. The southwestern portion of the Project site under Option A would include the construction of a 34,400-square-foot performing arts center adjacent to W. Alondra Boulevard.

The reconstruction of the western portion of the Project site under Option A would involve the addition of two softball fields, one soccer field, six tennis courts, and five basketball courts; upgrades to the existing baseball field; the relocation of the football stadium from the southeastern portion of the CHS campus to the northern portion, adjacent to the baseball field; and the relocation of the existing parking lot farther north of its present location, adjacent to the facilities building. Option A also would include various softscape, hardscape, and other associated outdoor improvements throughout the Project site, including the incorporation of bioswale and water-retention features.

Primary access to the Project site under Option A would be provided within a main parking lot along S. Acacia Avenue.

Option B: Reconstruction with the Inclusion of Additional Parcels

As shown in **Figure 3, Conceptual Site Plan—Option B**, Option B of the proposed Project would include the acquisition of the 10 parcels southeast of the existing CHS campus. Under Option B, the demolition of all existing uses on the Project site would still occur, as would the reconstruction of the new CHS campus, which would include the additional parcels.

The reconstruction of the eastern portion of the Project site under Option B would include two 3-story academic buildings consisting of approximately 151,400 square feet; an approximately 58,000-square-foot gymnasium and outdoor, Olympic-size swimming pool; an approximately 58,500-square-foot performing arts center; and the addition of eight tennis courts.

Under Option B, the reconstruction of the western portion the Project site also would provide for three softball fields, two soccer fields, and four basketball courts; upgrades to the existing baseball field; the relocation of the football stadium from the southeast of the CHS campus to the north, adjacent to the

baseball field; and the relocation of the existing north parking to a location slightly farther north. Development under Option B would also include various softscape, hardscape, and other associated outdoor improvements throughout the Project site, including the incorporation of bioswale and water-retention features.

Primary access to the Project site under Option B would be provided along a one-way access roadway within and along S. Acacia Avenue. Option B will not include the community park with basketball courts at Coco Street and Acacia Ave.

Utilities and Street Vacations

To facilitate construction of the proposed Project, both Options A and B would involve street vacations and potential relocations of existing utility infrastructure. Option A would only involve the vacation of S. Oleander Avenue, while Option B would involve the vacation of S. Oleander Avenue as well as W. Cocoa Street as part of the acquisition area. The potential relocations of existing utility infrastructure would be associated with these proposed street vacations.

ENVIRONMENTAL TOPICS TO BE ADDRESSED IN EIR: Aesthetics (Visual Character/View and Light/Glare), Air Quality, Biological Resources, Cultural Resources (Historical & Archaeological Resources), Geology & Soils, Greenhouse Gas Emissions, Hazards & Hazardous Materials, Hydrology & Water Quality, Land Use & Planning, Noise, Transportation & Traffic, and Tribal Cultural Resources.

PUBLIC SCOPING MEETING DATE, TIME, AND LOCATION: The Scoping Meeting will be held on November 16, 2017, at 6:00 PM at the Compton High School Auditorium, located in the Administration Building. The purpose of the Scoping Meeting is to solicit public comments regarding issues to be addressed in the EIR. The Scoping Meeting will provide information regarding the proposed Project and the anticipated scope of analyses to be contained in the EIR. CUSD encourages all interested individuals and organizations to attend this meeting. Written comments may be submitted at the Scoping Meeting.

Date: November 16, 2017
Time: 6:00 PM
Location: 601 S. Acacia Avenue
Compton High School Auditorium, located in the Administration Building

COMMENTS: The period for agencies and members of the public to submit comments will be for 30 days commencing on **November 1, 2017**, and ending at 5:00 PM on **December 1, 2017**.

Written comments only need to be sent to the CUSD at the following address:

Compton Unified School District
Facilities Department
429 South Oleander Avenue
Compton, CA 90220
Contact: Nathaniel Holt, Chief Facilities Officer

Comments may also be sent by facsimile to (310) 631-9871 or by email to eroaro@compton.k12.ca.us.

Please put **"Compton High School Reconstruction Project"** in the subject line.

Date:

10-31-2017



Nathaniel Holt
Chief Facilities Officer
Compton Unified School District

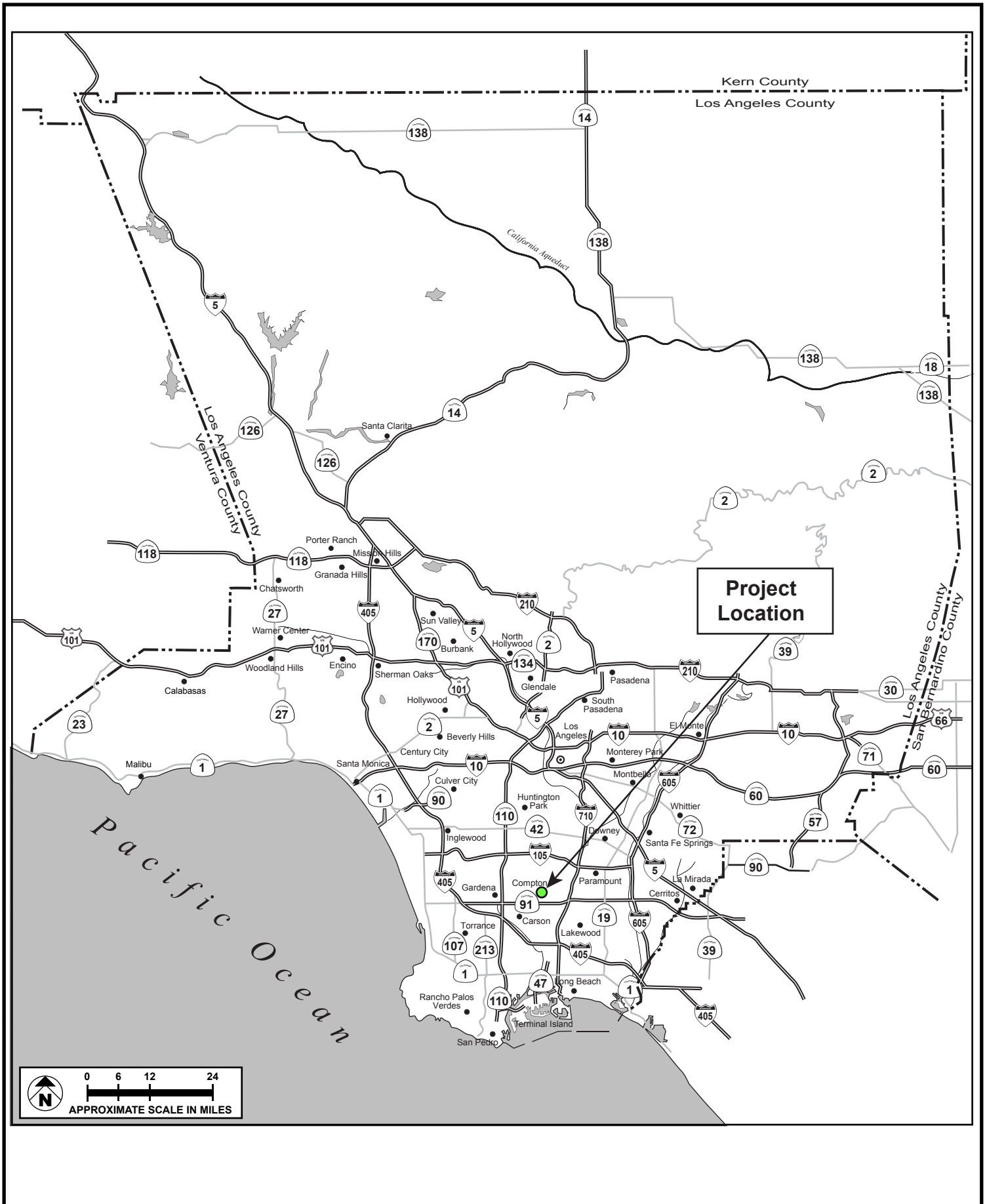


FIGURE 1



SOURCE: DLR Group – October 2017

FIGURE 2



SOURCE: DLR Group – September 2017

FIGURE 3

APPENDIX A.2

Comment Letters



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

November 1, 2017

To: Reviewing Agencies

Re: Compton High School Reconstruction Project
SCH# 2017111002

Attached for your review and comment is the Notice of Preparation (NOP) for the Compton High School Reconstruction Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Nathaniel Holt
Compton Unified School District
429 South Oleander Ave
Compton, CA 90220

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,


Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017111002
Project Title Compton High School Reconstruction Project
Lead Agency Compton Unified School District

Type **NOP** Notice of Preparation

Description CUSD is proposing to reconstruct the Compton High School (CHS) campus. The proposed project would consist of the demolition of all existing buildings, facilities, and athletic fields, and the construction of new, modern buildings, facilities, and athletic fields with a design that supports a free-flowing campus. Implementation of the proposed Project would provide CUSD with the range of updated and modern school facilities for CHS to meet current standards and to meet the immediate and long-term educational needs of the community. The reconstructed campus would be able to accommodate a total of 2,500 seats.

Lead Agency Contact

Name Nathaniel Holt
Agency Compton Unified School District
Phone (310) 639-4321 **Fax**
email
Address 429 South Oleander Ave
City Compton **State** CA **Zip** 90220

Project Location

County Los Angeles
City Compton
Region
Cross Streets W. Myrrh St, S. Acacia Ave., W. Alondra Blvd, S. Oleander Ave. W. Alondra Blvd
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues Aesthetic/Visual; Air Quality; Biological Resources; Archaeologic-Historic; Geologic/Seismic; Other Issues; Housing; Water Quality; Landuse; Noise; Traffic/Circulation; Tribal Cultural Resources

Reviewing Agencies Resources Agency; Department of Conservation; Department of Water Resources; Department of Parks and Recreation; Department of Fish and Wildlife, Region 5; California Department of Education; Native American Heritage Commission; Public Utilities Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 4

Date Received 11/01/2017 **Start of Review** 11/01/2017 **End of Review** 11/30/2017

DP Distributor List

Resources Agency

Resources Agency
Jadell Gayou

Dept. of Boating & Waterways
Denise Peterson

California Coastal Commission
Allyson Hitt

Colorado River Board
Lisa Johansen

Dept. of Conservation
Crina Chan

Cal Fire
Dan Foster

Central Valley Flood Protection Board
James Herota

Office of Historic Preservation
Ron Parsons

Dept of Parks & Recreation
Environmental Stewardship Section

S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck

Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division

Fish & Wildlife Region 1
Curt Babcock

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Jeff Drongesen

Fish & Wildlife Region 3
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Tiffany Ellis
Habitat Conservation Program

Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Wildlife M
William Paznokas
Marine Region

Other Departments

California Department of Education
Lesley Taylor

OES (Office of Emergency Services)
Monique Wilber

Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

Dept. of General Services
Cathy Buck
Environmental Services Section

Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions, Boards

Delta Protection Commission
Erik Vink

Delta Stewardship Council
Kevan Samsam

California Energy Commission
Eric Knight

County: Los Angeles

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Supervisor

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning HQ LD-IGR
Christian Bushong

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

Caltrans, District 1
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Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

Caltrans, District 4
Patricia Maurice

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Cal EPA

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Nesamani Kalandiyur

Industrial/Energy Projects
Mike Tollstrup

California Department of Resources, Recycling & Recovery
Sue O'Leary

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water

State Water Resources Control Board
Div. Drinking Water # _____

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

SCH#

201711012

Regional Water Quality Control Board (RWQCB)

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other _____

Conservancy.

NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710



November 8, 2017

Nathaniel Holt
Compton Unified School District
429 South Oleander Avenue
Compton, CA 90220

Sent via e-mail: eroaro@compton.k12.ca.us

RE: SCH# 2017111002; Compton High School Reconstruction Project; Los Angeles County, California

Dear Mr. Holt:

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

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a **separate category of cultural resources**, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

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

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

7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).

11. **Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

This process should be documented in the Cultural Resources section of your environmental document.

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

SB 18

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

Some of SB 18's provisions include:

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

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

NAHC Recommendations for Cultural Resources Assessments

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

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

Mr. Nathaniel Holt
November 30, 2017
Page 2

unpermitted, or discouraged from using alternate modes that can reduce transportation-related greenhouse gas emissions.

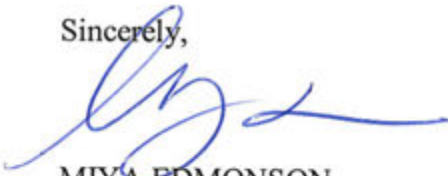
Although CUSD has a limited role in shaping transportation habits, the design of the school (pedestrian-oriented vs automobile-oriented) and amenities it provides (greenspace, car parking, bicycle parking, etc) can influence how site users go to and from the school and this should be considered. Site design that omits or makes needs of active transportation modes secondary would be inconsistent with desired State goals of promoting sustainable transportation and reducing greenhouse gas emissions. Design elements such as providing quality and inviting amenities for active transportation are especially opportune because children are more likely to walk, bicycle, skateboard, or take other active modes than the general population.

In the Draft Environmental Impact Report (DEIR), Caltrans would like to see a discussion of, and provisions for, both car and bicycle parking, not just car parking. Ideally, such a discussion of car and bicycle parking would be complemented with diagrams indicating more precise location, type, and quantity of parking for both modes instead of just one.

Finally, as a reminder any transportation of heavy construction equipment and/or materials requiring use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. Caltrans recommends that large size truck trips be limited to off-peak commute periods. Also, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Be mindful that the project needs to be designed to discharge clean run-off water. The completed project could incorporate green design elements that can capture storm water. Incorporating permeable pavement, landscaping, and trees to reduce urban water run-off should be considered.

If you have any questions regarding these comments, please contact project coordinator Severin Martinez, at (213)-897-0067 or severin.martinez@dot.ca.gov and refer to GTS# LA-2017-01203.

Sincerely,



MIYA EDMONSON
Acting IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

eroaro@compton.k12.ca.us

Compton Unified School District
Facilities Department

Attention: Nathaniel Holt, Chief Facilities Officer
429 South Oleander Avenue
Compton, CA 90220

November 17, 2017

Notice of Preparation of a Draft Environmental Impact Report for the Compton High School Reconstruction Project

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

Air Quality Analysis

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

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

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

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

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

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

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

Mitigation Measures

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

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

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

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

Alternatives

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

Permits

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

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

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or call me at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC171107-03

Control Number



Metro

December 1, 2017

Nathaniel Holt
Facilities Department
Compton Unified School District
429 South Oleander Avenue
Compton, CA, 90220

**RE: Comment Letter for Compton High School Reconstruction Project – 601 S Acacia Avenue –
Notice of Preparation of a Draft Environmental Impact Report (EIR).**

Dear Mr. Holt:

Thank you for the opportunity to comment on the Notice of Preparation of a Draft EIR for the Compton High School (CHS) Reconstruction Project located at 601 S Acacia Avenue in the City of Compton. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

Metro is committed to working with stakeholders across the County to support the development of transit oriented communities (TOCs). TOCs are built by considering transit within a broader community and creating vibrant, compact, walkable, and bikeable places centered around transit stations and hubs with the goal of encouraging the use of transit and other alternatives to driving. Metro appreciates the opportunity to collaborate with local municipalities, developers, and other stakeholders in their land use planning and development efforts, and to find partnerships that support TOCs across Los Angeles County.

Project Description

Compton Unified School District (CUSD) is proposing to reconstruct the CHS campus. The proposed Project would consist of the demolition of all existing buildings, facilities, and athletic fields, and construct a new, modern high school campus with buildings, facilities, and athletic fields that supports a free-flowing campus. Implementation of the proposed Project would provide CUSD with the range of updated and modern school facilities for CHS to meet current standards and to meet the immediate and long-term educational needs of the community. When completed, the reconstructed campus would be able to accommodate up to 2,500 students.

Metro Comments

Bus Operations

Metro bus lines 51, 52, and 352 operate on East Myrrh Street adjacent to the proposed project. Although the project is not expected to result in any long-term impacts on transit, the Developer should be aware of the bus services that are present. Please contact Metro Bus Operations Control

Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 at least 30 days in advance of initiating construction activities. Other municipal bus operators may also be impacted and should be included in construction outreach efforts.

Transit Orientation

Considering the proximity to the Metro Blue Line Compton Station, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Metro supports development of institutional, commercial, and residential properties near transit stations and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the Developer to be mindful of the Project's proximity to the Blue Line Compton Station, including orienting pedestrian pathways toward the station.
2. Metro would like to inform the Developer of Metro's employer and student transit pass programs. The Annual Transit Access Pass (A-TAP) and Student Transit Access Pass (S-TAP) are programs which offer efficiencies and group rates to agencies like CUSD that can offer employees as an incentive to utilize public transit and for students to receive a reduce fare. For more information on these programs, contact Devon Deming at 213-922-7957 or DemingD@metro.net.
3. Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities or parking benefit districts. These strategies could be pursued to encourage more transit-oriented development and reduce automobile-orientation in design and travel demand.
4. With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the station including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc.
5. The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting stations with housing and employment concentrations. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: http://media.metro.net/docs/sustainability_path_design_guidelines.pdf
6. Metro encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along the primary building frontage to improve pedestrian safety and comfort to access the nearby bus stops. The Developer should consider requesting the installation of such amenities as part of the development of the site.

Active Transportation

Metro encourages the Developer to promote bicycle use through adequate short-term bicycle parking, such as ground level bicycle racks, as well as secure and enclosed long-term bicycle parking for students and employees. Additionally, the Project should help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations such as Compton Station. The developer is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation.

Congestion Management Program

Beyond impacts to Metro facilities and operations, Metro must also notify the applicant of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Derek Hull at 213-922-3051 or by email at DevReview@metro.net. Metro looks forward to reviewing the Draft EIR. Please send it to the following address:

Compton High School Reconstruction Project
Notice of Preparation of Draft EIR– Metro Comments
12/1/17

**Metro Development Review
One Gateway Plaza MS 99-18-3
Los Angeles, CA 90012-2952**

Sincerely,



Derek Hull
Manager, Transportation Planning

Attachments: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.



Sent via electronic mail to eroaro@compton.k12.ca.us

November 6, 2017

Nathaniel Holt
Chief Facilities Officer
Compton Unified School District Facilities Department
4269 South Oleander Avenue
Compton CA 90220

RE: Notice of Preparation for Draft Environmental Impact Report for the Compton High School Reconstruction Project

Dear Mr. Holt:

Southern California Edison (SCE) is pleased to submit the following comments on the proposed Draft Environmental Impact Report (DEIR) for the Compton High School Reconstruction Project. The Project is proposing to reconstruct the Compton High School campus through demolition of all existing buildings, facilities, and athletic fields. Construction of new, modern buildings, facilities, and athletic fields will be designed to support a free-flowing campus and provide updated and modern school facilities to meet current standards and the immediate and long-term educational needs of the community.

SCE's Electrical Facilities

SCE provides electric service to the City of Compton and maintains electrical transmission and distribution facilities, as well as substations and supporting appurtenances in the City. Please note that "potential relocation of existing utility infrastructure (NOP page 3)" should be included in the DEIR and construction activities analyzed for impacts to resources included but not limited to aesthetics, air quality, biology (i.e., nesting birds), noise, transportation and traffic and utilities to avoid a separate California Environmental Quality Act (CEQA) review with the California Public Utilities Commission (CPUC).

Development within SCE's Rights-of-Way and Access Roads

The proposed project should not unreasonably interfere with SCE's ability to access, maintain, and operate its current and future facilities. Additionally, if any development which includes permanent, temporary or grading within the right-of-way (such as bike lanes and landscaping) are planned within SCE's corridors a written consent agreement signed between the developer and SCE is required. Any parkways or pathways (either by foot, bicycles, or other means) that invite the public onto SCE's right-of-way will require the installation of fencing and/or Climbing Discouragers on each transmission line tower at the customer's expense.

SCE's rights-of-way and fee-owned properties are used by SCE to operate and maintain its present and future facilities. SCE will review any proposed use on a case-by-case basis. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. Please forward five (5) sets of plans depicting SCE's facilities and associated land rights to the following location:

Real Properties Department
Southern California Edison Company
2 Innovation Way
Pomona, CA 91768

General Order 131-D

The construction, modification, and relocation of transmission lines, or electrical facilities that are designed to operate at or above 50 kilovolts (kV) may be subject to the California Public Utilities Commission's (CPUC) General Order 131-D¹. If the construction, modification, or relocation of transmission lines results in significant environmental impacts, they should be identified and discussed in the draft environmental impact report. If not, and as noted earlier, SCE may be required to pursue a separate, mandatory CEQA review through the CPUC, which could delay approval of the SCE portion of the project for two years or longer.

General Order 95

SCE must comply with General Order (GO) 95, which establishes rules and regulations for the overhead line design, construction, and maintenance. GO 95 also includes vertical clearance requirements from thoroughfares, ground, and railroads, as well as specific minimum clearances from tree branches and vegetation around overhead wires. The project's landscaping should not conflict with SCE's existing and proposed transmission line designs.

Method of Service

In order to determine electrical infrastructure necessary to support the proposed project, the project proponent must submit a signed Method of Service agreement to SCE and pay engineering fees for an electric service study to be completed. Infrastructure necessary to support this project is subject to licensing and permitting authority of the CPUC.

Permit to Construct (PTC) & Certificate of Public Convenience and Necessity (CPCN)

In addition, please note that SCE is subject to California Public Utilities Commission General Order 131-D (GO 131-D). Electric facilities between 50kV and 200kV are subject to the CPUC's Permit to Construct (PTC) review. For facilities subject to PTC review, or for over 200kV electric facilities subject to Certificate of Public Convenience and Necessity (CPCN) requirements, the CPUC reviews utility PTC or CPCN applications pursuant to CEQA and serves as Lead Agency under CEQA.

Catenary Wires

Existing heights of the 66kV and subsequently the 220kV above any overhead catenary wires used to power trains will also likely not meet GO 95 vertical clearance standards and will require SCE to increase the height of several towers along the adjacent right-of-way as well as possibly several towers down-line. Further, based on drawings and plans provided to SCE it is not clear if there is sufficient horizontal clearance for the 220kv towers. Accordingly, this may require the relocation of 66kV or 220kV towers or realignment of the proposed track. As a separate but no less significant issue to SCE, 24-hour access must be provided to SCE employees to repair and maintain all structures and facilities.

SCE appreciates the opportunity to comment on the Compton High School Reconstruction Project. SCE looks forward to working and collaborating with the City. If you have any questions regarding this letter, please contact me at heather.neely@sce.com or 626.476.7839.

Regards,

Heather Neely
Southern California Edison
General Office A#1 Quad 2C
2244 Walnut Grove
Rosemead CA 91770

¹ <http://docs.cpuc.ca.gov/PUBLISHED/Graphics/589.PDF>

From: Charles Brown
To: [Elana Roaro](#)
Subject: COMPTON HIGH SCHOOL RECONSTRUCTION PROJECT
Date: Thursday, November 16, 2017 5:11:30 PM

Good day
Hope you are well.
Thank you for the letter concerning the Compton High School Reconstruction.

The Compton 125 Historical Society is deeply concerned about the reconstruction of the Compton High School. I think we both can agree that the school is in need of some much need upgrades. Historically, Compton Senior High School is the oldest school in our city and the historical society believes it's extremely important that we preserve that site as a historical landmark.

Our recommendation is to preserve the front of the Administration building and the front grassy area around it, the BIG " C" and Senior Square.

It is a know fact that any building over 50 years old is considered an historical landmark. To destroy the entire building and put up a whole new structure will leave nothing preserved for generations to come.

Sincerely,
Rev. Charles L. Brown, President
Compton 125 Historical Society

[Sent from Yahoo Mail on Android](#)

Nathaniel Holt

From: Eliana Roaro
Sent: Friday, December 1, 2017 7:40 AM
To: Ray Cooper
Cc: Nathaniel Holt
Subject: RE: Compton High School Reconstruction Project

Importance: High

Good morning Mr. Cooper,

Facilities Dept. has received this electric correspondence and is pending review.

Eliana Roaro

Sr. Administrative Technician
Facilities, Maintenance, Operations & Transportation
Compton Unified School District
Phone (310) 639-4321 Ext. 55350
Fax (310) 631-9871

From: Ray Cooper [mailto:raymond.cooper@sbcglobal.net]
Sent: Thursday, November 30, 2017 9:25 PM
To: Eliana Roaro <eroaro@compton.k12.ca.us>
Subject: Compton High School Reconstruction Project

Please acknowledge receipt of this email immediately.
Thank you.

You can not achieve an accurate EIR if you do not present the accurate and proper facts at the start of the project. Some of the items that will have an adverse environmental impact are: lead paint and pipes, asbestos, dust, noise, increased utilities usage, traffic disruption due to construction (work crews, heavy and noisy trucks and equipment), plus the impact on the students, parents, teachers, and staff due to relocation. Also, we need to ensure that the construction does not have an adverse effect on the Compton Creek. Option A has 320,800 square feet of building space. Option B has only 267,900 square feet of building space, a decrease of <52,900> square feet. Also Option B does not have an administration building. Where will the administrators be housed in Option B and why the big difference in square footage between the two options?

The biggest concern is the additional traffic that will be generated by the new stadium, gym, pool and the performing arts center. The performing arts center and the use of the stadium for competition soccer suggests a large amount of new traffic flowing into the neighborhood, especially at night and on weekends. This will also create new security issues. Are the parking lots large enough to handle these extra cars? Is the community aware of these new activities that will be affecting their lives, especially the lights at night and the added noise? Remember there is a senior citizen residential building in the next block north of the school.

Also, where is the entrance to the maintenance yard? Will the maintenance staff and equipment need to exit through the school parking lot? We need to ensure that there is adequate storm drainage and

proper sloping to eliminate the current flooding problem along Oleander Avenue near the music rooms.



COMPTON UNIFIED SCHOOL DISTRICT

Compton High School Reconstruction Project

Environmental Impact Report Scoping Meeting Summary

November 16, 2017, 6:00PM

Compton High School Auditorium, 601 S. Acacia Avenue

Agenda

1. Introduction of meeting by Nathaniel C. Holt, CUSD Chief Facilities Officer
 - Discussion of the purpose of meeting and District's status on the Project
 - Introduction of District staff and consultants
2. Presentation by Kelene Strain, Meridian Consultants
 - Discussion of the Compton High School Reconstruction Project
 - Purpose of Scoping Meeting and California Environmental Quality Act (CEQA) process
 - Identification of issue areas that will be studied in the Environmental Impact Report (EIR)
 - Environmental review schedule
 - Overview of scoping and public comment period and direction on how to submit scoping comments to the District
3. Questions/Public Comment (see summary below)

Summary of Public Comments

Speaker #1

Travis Thompson

- When will construction of the Project occur? Start date?

Speaker #2

John Thompson

Alumni '65, Former JV/Varsity CHS Baseball Coach

- What is the anticipated student count for CHS? Does the District plan to readjust its attendance boundaries?
- Will the District implement curriculum changes at CHS?
- Surprised by the low turnout of the scoping meeting



COMPTON UNIFIED SCHOOL DISTRICT

Speaker #3

Raymond A. Cooper, Community Activist

- Components of the Project will have impacts on surrounding community, particularly impacts from the Performing Arts Center
 - Concerns with size and magnitude
 - What will the capacity be? How many seats?
 - Parking and traffic impacts associated with events during the week and weekends
 - Impacts along Alondra, Acacia, and Myrrh
 - Concerned that District is “kicking ball down the road” and will change the proposed use of the PAC in the future
- When/how did the District advertise the scoping meeting?
 - Need full community input (not just people with children in the District)
 - i.e. send out mailers, signs, flyers?



Compton High School Reconstruction Project EIR Scoping Meeting Sign-In

Name/Organization	Address	Email
Alejandro Alvarez/comptonUSD	501 S. Santa Fe Ave Compton, Ca. 90221	
Deborah Spottsville / CUSD	429 So. Olander Ave. Compton 90220	dspottsville@compton.k12.ca.us
Nathaniel C Holt	429 - So Olander Ave Compton 90220	with NHOLT@compton.k12.ca.us
RAYMOND A. COOPER	616 S. MAXO AVE COMPTON CA 90221	RACOOPER52@YAHOO.COM
John Thompson	PO Box 3046, Torrance Ca. 90510	johnsewardthompsoniii@gmail.com
TRAVIS Thompson	PO B 88371 LA CA 90009	
SAMUEL SALEDO	1406 1/2 127th ST COMPTON CA 90222	
MARCIA LIDDELL	328 Le Bennett CT Compton 90220	mlidde11@compton.k12.ca.us