

LETTER NO. 12

Dated: 2/15/01

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COMMENT 12.1

On January 29, 2001 the Los Angeles Unified School District submitted comments on the draft Environmental Impact Report (EIR) for the Los Angeles Sport and Entertainment District. Attached are additional comments on the project's potential noise impact on Tenth Street Elementary School.

RESPONSE 12.1

The commentor's previous letter is included in this Final EIR as Letter No. 11. Responses to the comments submitted regarding noise impacts are provided in Responses to Comments Nos. 12.1 through 12.4.

COMMENT 12.2

The following measure should be adopted to address noise and vibration from construction hauling and delivery, unless the EIR can demonstrate that off-site construction activities will not have an impact on Tenth Street School:

- Construction vehicles shall be prohibited from passing Tenth Street School during school hours.

Please call me at (213) 743-5086, ext. 555 if I can provide any additional information.

RESPONSE 12.2

As discussed in Response to Comment 11.1, the proposed project has incorporated a mitigation measure that will establish construction haul routes in order to minimize construction vehicle traffic from passing by Tenth Street Elementary School. Although this mitigation measure has been added to address potential pedestrian safety impacts at the school, the measure will adequately ensure that noise impacts are less than significant. Refer to Item IV.F.3.a in Section II, Corrections and Additions to the Draft EIR.

COMMENT 12.3

Thank you for the opportunity to review the noise section of the above mentioned EIR. The Draft EIR acknowledges the 10th Street Elementary School as a noise-sensitive receptor, and adequately analyzes the project's impact on the school, in terms of project operation and on-site construction activity.

However the Draft EIR does not adequately analyze the off-site construction noise impacts on the 10th Street Elementary School, which is identified in the EIR as being located at the northwest corner of Valencia Street and Olympic Boulevard. Given the fact that the school is located in close proximity to roadways that provide local access to the project site, the Draft EIR must analyze the noise impacts of off-site construction activities such as delivery and hauling of construction materials and supplies to and from the project site. It is common knowledge that noise from on-site construction equipment and other stationary activities can be reduced with standard factory silencing features and other noise reducing devices, but noise and vibration from construction hauling/delivery trucks cannot be fitted with these features at all times.

RESPONSE 12.3

Construction noise at Tenth Street School could result from two activities: 1) on-site construction and 2) construction vehicles traveling on roadways near the school.

Given the widely accepted noise regulations, noise would be below ambient noise levels. On-site construction facilities are sufficiently distant from the school and, given normal noise attenuation rates, would not be audible since construction noise levels at the school would be approximately 58 dBA which is less than the measured ambient level of 72 dBA. In addition, Project buildings would act as barriers to noise once constructed.

As discussed in Response to Comment 11.1, the proposed project has incorporated a mitigation measure that will establish construction haul routes in order to minimize construction vehicle traffic from passing by Tenth Street Elementary School. Although this mitigation measure has been added to address potential pedestrian safety impacts at the school, the measure will adequately ensure that noise impacts are less than significant. Refer to Item IV.F.3.a in Section II, Corrections and Additions to the Draft EIR.

Since both activities would result in less than significant increases in noise levels at the Tenth Street School, impacts would be less than significant.

COMMENT 12.4

The EIR should demonstrate its claim on page 344 that construction activities associated with the proposed project would result in less than significant impact to the 10th Street Elementary School.

RESPONSE 12.4

For the reasons identified in Responses to Comments 12.2 and 12.3 the proposed project would result in a less than significant impact to the Tenth Street Elementary School.

COMMENT 12.5

At the very least, the EIR should identify the haul route, and the route for construction delivery trucks/vehicles, as well as the times for delivery/hauling etc., with a diagram to substantiate this claim.

RESPONSE 12.5

The Construction Management Plan will designate construction haul routes along major arterial streets, which will minimize the number of construction truck trips using neighborhood streets.

COMMENT 12.6

The LAUSD appreciates the inclusion of Mitigation Measure No.2 on page 356 of the Draft EIR. However, to the extent that the EIR is unable to show that off-site construction activity would not result in noise impacts to the 10th Street Elementary School, additional mitigation would be required in accordance with Section 15126.4 et. seq. of the CEQA Guidelines.

Should you have any questions regarding the above review, please do not hesitate to contact me.

RESPONSE 12.6

Please refer to Response to Comment 12.3 regarding mitigation for noise impacts to Tenth Street Elementary School.