

2. Response to Comments

LETTER R32 – Dean Francois (5 pages)

Michael Paul

Subject: FW: Hermosa Beach North School Comments on DEIR

----- Forwarded message -----

From: Dean Francois [REDACTED]

Date: Tue, Jan 2, 2018 at 4:00 PM

Subject: Re: Hermosa Beach North School Comments on DEIR

To: ajones@hbcasd.org <ajones@hbcasd.org>

On Tuesday, January 2, 2018 3:47 PM, Dean Francois [REDACTED] wrote

Dean Francois
[REDACTED]
[REDACTED]
[REDACTED]

SUBJ: Hermosa Beach North School Comments on DEIR

ajones@hbcasd.org

R32-1 I am a long-time activist and have reviewed many EIR's in the south bay cities. I am President of the Redondo Beach Historical Society, and also serve on the local executive committee of the Sierra Club's PV-SB Group. I have formed and headed up the "Friends of the South Bay Bicycle Path", and the "Protectors of Public Ocean Views". We have made great strides in protecting public resources. My comments are being sent to you without the participation of any group.

The timing of the release of the DEIR is troubling in that the school district has been closed for several weeks. In fact the deadline provided of today, the school is still closed. This has limited the public's ability to respond.

R32-2 we are all fully aware of the need for an improved school. However, one should take a very critical look at this DEIR and its inaccurate and misleading representations, as well as the Proposed Project and its very real, adverse impacts.

Of utmost importance to this DEIR is the fact that the DEIR failed to address any of the scoping comments that were received from many members of the public. There were many relevant issues that have not yet been addressed, most importantly the demolishing of the historic resource, and the true value of finding a way to save the building.

R32-3 California Code of Regulations, Guidelines for Implementation of the California Environmental Quality Act, § 15124 ("CEQA Guidelines"). States: "An EIR should be prepared with a sufficient degree of analysis to provide

2. Response to Comments

decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences."

R32-3
cont'd

The DEIR does not provide adequate information to thoroughly evaluate certain impacts. Most importantly, the affect of traffic not only during construction, but the unintended consequences of regular traffic on very thin local streets. Furthermore, more environmentally friendly alternatives were not adequately considered and studied in order to make the best decision.

Aesthetic and Visual Resources

R32-4

"An EIR is an informational document which will inform public agency decision makers and the public generally of the significant environmental effect of a project." CEQA Guidelines, § 15121(a). The purpose of informing public agency decision makers and the public is not served if a DEIR or EIR analysis reflects bias or seeks to put conditions in the most favorable light to the exclusion of other information.

The DEIR analysis of aesthetic and visual resources is patently biased towards the proposed project..... a decision to tear down and build a new school.

R32-5

The description of the buildings on the campus have not been adequately described as to their historical significance. Each one is independently important and somehow the DEIR miss-categorized the significance of the school. This has been greatly detailed in several of the scoping comments which this DEIR ignored. You were provided with scoping comments and the comments are in your appendix. Had the value of the resources been adequately described, other alternatives would be more favorable. I refer to the scoping comments and request they be addressed.

Alternatives

R32-6

The DEIR should provide an alternative to the Proposed Project that reduces the impact of traffic, construction on the community, reduces the severe impact on cultural and historic resources, and saves historic buildings.

R32-7

Alternative 1, 3, and 4. need further study. These alternatives were not evaluated for further review and discarded in the final analysis. The attention given to alternative 3d the community center is completely inadequate. Assumptions were made with grasp opinions not supported by fact or analysis. This options need further study.

R32-8

The final summary of alternatives in the DEIR did not include these alternatives. Instead, it was only compared to alternatives A (no project) and B (reallocate funds). In the summary, the project was given a LTS_MM rating on affects to element 4 (cultural resources). This is an incorrect rating. The destruction and demolition of the school building is a significant environmental impact. The rating on element 12 (traffic) is also faulty. The EIR needs to study alternates 1, 3, and 4. Rating them in a grid comparing the affects they have compared to the proposed project will result in a superior environmental alternative, could save the old school building, and result in a better project than what is proposed. This is required in this process and has not been accomplished.

2. Response to Comments

Summary

The DEIR should be redone and re-circulated. The Proposed Project has significant impacts that are not identified and/or not adequately analyzed. First and foremost, the Proposed Project fails to honor the cultural resources element in the EIR process. And the public interest in protecting limited coastal resources.

P32-9

The DEIR must examine more critically the visual and aesthetic impacts of the Proposed Project.

A more comprehensive and objective DEIR will reveal significant impacts which will call for an alternative to mitigate those impacts.

Dean Francois

<https://www.facebook.com/SaveHermosaPlaza/>

Sent from Gmail Mobile

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Dean Francois
[REDACTED]
[REDACTED]
[REDACTED]

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2. Response to Comments

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R32-10
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2. Response to Comments

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R32. Response to Comments from Dean Francois, dated January 2, 2018.

R32-1 The commenter provides background on his qualifications and states his comments on the proposed North School reconstruction project do not represent any of the groups he is affiliated with. The comment concerns the public review period of the DEIR; that it was not favorable since the school district was closed for several weeks during the review period.

The information concerning the commenters affiliations are noted. The public review period for the DEIR was between November 13, 2017, and January 2, 2018, for a duration of 51 days, which is longer than that legally required by the California Environmental Quality Act. Although schools were closed, the District administration office was open during the winter break; see Response R14-2.

R32-2 The comment states that the DEIR failed to address comments received during the scoping period, in particular comments related to historic resources.

This comment is inaccurate. All of the comments received during the scoping meeting were reviewed and considered during preparation of the DEIR. Copies of the comments received were included in DEIR Appendix B and were also summarized in DEIR Section; see Table 2-1, Table 2-2, and Table 2-3. CEQA does not require the lead agency to prepare written responses to comments received during the scoping period. Studies conducted prior to the issuance of the notice of preparation, including draft traffic impact study and draft historical resources assessment, were updated in April 2017 and July 2017, respectively and included as DEIR Appendix E and Appendix M. The updated reports considered the comments received during the scoping period.

R32-3 The comment cites CEQA Guidelines Section 15124 and includes an excerpt. The comment further states that the DEIR does not provide adequate information to evaluate impacts, including traffic, not only during construction, but traffic on local streets, and that the project did not consider more environmentally friendly alternatives.

The excerpt provided does not correspond to the specified section; the correct citation should be Section 15151. The DEIR provides sufficient analysis that will allow decisionmakers to make informed decisions. The traffic impact analysis studies both short-term construction effects, as well as long-term daily operational impacts. The traffic impact analysis was scoped with and approved by the City of Hermosa Beach for its technical adequacy. Furthermore, the DEIR analyzed 19 alternative variations, including those suggested during this scoping period. Please see DEIR Section 7 for analysis of project alternatives.

R32-4 The comment includes in excerpt from CEQA Guidelines Section 15121(a) and states that informing public agency decisionmakers and the public is not served if the DEIR reflects bias or excludes information. The comment further states that the analysis

2. Response to Comments

conducted for visual impacts is biased towards the project which is to tear down the existing school and build a new school.

DEIR Section 5.1 analyzes visual impacts to scenic vistas and corridors, determines if the project would degrade the character and quality of the site and surrounding area, and analyzes if the project would create glare and light that could affect views in the area. The analysis was objective; Mitigation Measures AES-1 and AES-2 were recommended to ensure that potential light and glare impacts are reduced to less than significance.

- R32-5 The comment states that the description of each building on the project site has not been adequately described to their historical significance and “miss-categorized.”

The Final HRAR dated July 2017 contains revised and corrected information that was not present in the Draft HRAR of May 2016. The changes do not affect the conclusion or findings of the HRAR on the historical significance of the North School property. The comment does not explain what is meant that the individual buildings on campus were miscategorized. The individual buildings and the campus as a whole were surveyed and evaluated by a qualified historian using National Register of Historic Places and California Register of Historical Resources criteria to determine the significance of the built-environment resources on the North School campus.

- R32-6 The comment states the DEIR should provide an alternative that reduces traffic impacts, construction on the community, reduces impacts to cultural and historic resources, and saves historic buildings.

As provided in CEQA Guidelines 15126.6(a), alternatives should be selected on the basis of avoiding or substantially lessening any of the significant effects of the project. The proposed project would not result in a significant impact to a historical resource. Nevertheless, 19 alternative variations were analyzed in DEIR Section 7. The alternatives included reusing the existing buildings, reducing traffic on the streets south of the project site, and constructing permanent buildings at Valley and View Schools to eliminate portable buildings on the existing schools.

- R32-7 The comment states that Alternatives 1, 3, and 4 should be further studied but does not state what further analysis should be conducted.

DEIR Section 7.3.2.1, Alternate 1 is modernization of the existing North School Facilities; DEIR Section 7.3.2.3, Alternate 3 includes analysis of four alternative locations, including use of the Hermosa Beach Community Center; and DEIR Section 7.3.2.4, Alternate 3 is a hybrid alternative to sell North School and use the money for new construction elsewhere. Although the DEIR eliminates these alternatives from further consideration, the District Board of Education will consider them, as a part of

2. Response to Comments

their consideration for project approval. The DEIR provides meaningful evaluation of all of the alternatives to the extent needed for informed decision-making.

- R32-8 The comment states that the summary of the alternatives do not include those rejected from further consideration, that the summary incorrectly states that project impacts to cultural resources are less than significant, and impacts to traffic are faulty. It further states that Alternatives 1, 3, and 4 need further analysis and rating because they will be environmentally superior as compared to the proposed project.

As mentioned above in Response R32-6, alternatives are selected based on whether the alternative would avoid or substantially less than any of the significance of the project. Traffic impacts on intersections and streets, as concluded in DEIR Impact 5.12-1, would not result in significant environmental adverse effects. Similarly, DEIR Impact 5.4-1 concludes that buildings at North School do not meet criteria indicating that they are historical resources. CEQA Guidelines Section 15126.6(a) provides that the DEIR need not consider alternatives, whose implementation is remote and speculative; therefore, DEIR Table 7-1 will not be updated with alternatives that have been determined infeasible.

- R32-9 The comment states that the DEIR should be redone and recirculated because the proposed project has significant impacts that have not been identified or adequately analyzed.

No evidence has been provided to substantiate how the proposed project would result in significant impacts. The DEIR meets the requirements of the California Environmental Quality Act.

- R32-10 This comment letter was attached to the January 2, 2018 email and contains the same comments as identified in comments R32-1 – R32-9.

The comments have been responded to accordingly, above.

2. Response to Comments

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