

March 13, 2017

PlaceWorks

Barbara Heyman, Associate Principal
c/o Hermosa Beach City School District
Ms. Angela Jones, Business Manager
1645 Valley Drive
Hermosa Beach, CA 90254

Dear Ms. Heyman,

Below are some issues that need to be addressed for the upcoming Draft Environmental Impact Report:

Item 2. Environmental Setting, 2.1 Project Location:

1. The North School project site is located in the far northwest corner of Hermosa Beach. According to District demographic reports the majority of school aged children reside in southeast and southwest corners of Hermosa Beach. North School is proposed to house 510 3rd and 4th grade students. Because of the location of North School many parents and students will need to travel the length of Hermosa Beach, many of them driving, in order to attend the school.
2. Hermosa Beach parents with children in Transitional Kindergarten through 2nd grade will also need to drop off their children at View School located on Prospect Street (East Hermosa) and parents with children in 5th through 8th grade will need to drop off children located at Valley School (Central Hermosa) on Valley Drive and Pier Avenue.
- underused 3. There is an unused former school campus that is located in the center of Hermosa Beach called Pier Avenue School. It consists of 15 classrooms in 4.7 acres of space (not including former playfields), a gymnasium, 400+ seat auditorium, tennis courts, baseball diamond, basketball courts, and ample space for off street pick up and drop off of students.
4. Pier Avenue School is the District's former Middle School which was sold at below market cost to the City of Hermosa Beach in 1978 due to declining enrollment with the provision that when future enrollment rose past 1,266 students the District would be entitled to use of the campus.
5. According to the Sale and Purchase Agreement for Pier Avenue School, Exhibit B, Article 4, the Hermosa Beach City School District is entitled to priority use of classrooms, office space and storage space at Pier Avenue School when enrollment exceeds 1,266 students. The 1,266 student enrollment threshold was surpassed in 2010 yet HBCSD choose not exercise their option to use Pier Avenue School.

Item 2. Environmental Setting, 2.2 Existing Setting, 2.2.1 Project Site:

1. South Bay Adult School: *"... the current programs operate between 8:00am and 1:00pm, Monday to Friday. There are approximately 95 students and 36 volunteers."*
 - a. This is a misleading statement in that the approximately 95 students and 36 volunteers do not all come on the same day or at the same time. There are single day classes for only two hours from 9:30am to 11:30am and from 12:00pm to 2:00pm etc., there are also Monday, Wednesday schedules and Tuesday, Thursday schedules. Because of these staggered classes and schedules the impact to the residential neighborhood of a school for 510 students as proposed with a starting time of exactly 8:30am and an ending time of 3pm has a much more negative impact on traffic and noise. Likewise the "volunteers" are parents who participate in the Mommy and Me classes with their children. They are not permanent staff members who work at the South Bay Adult School and travel to North School every day.
2. Children's Journey Learning Center: *"The facility opens at 7:00am and closes at 6:00pm, Monday to Friday. Children's Journey enrolls approximately 210 students with 36 staff members."*
 - b. This is a misleading statement in that the approximately 210 students and 36 volunteers do not all come on the same day or at the same time. There are some children who are brought only in the morning or only in the afternoon or for only a single day or multiple days. There is no fixed starting time for parents to drop off children like there is at a public school. Likewise the 36 volunteers are not regular staff members who work at the site every day or all day. Because of the staggered classes and schedules of children and the volunteer staff the impact to the residential neighborhood of a proposed public school for 510 students with a starting time of exactly 8:30am and an ending time of 3pm has a much more negative impact on traffic and noise than the use of the site over the last 20+ years.
3. North School, as a public school with set starting and stopping times, has historically averaged only 300 students on it's 2.25 acre site between 25th street, 26th street and Myrtle Ave.
4. North School has not been used as a HBCSD campus since 1987.
5. Approximately 85% of the toddlers and babies and after school care provided by Children's Journey and South Bay Adult School serviced Hermosa families. Hermosa families who need infant and toddler day care now have to travel miles away to use other daycare facilities.

Item 5. Environmental Analysis, 5.5 Cultural Resources, a): *"Cause an substantial adverse change in the significance of a historical resource as defined in Code 15064.5."*

1. *"The buildings on the project site are over 50 years of age and may be eligible to be listed as a National or California Historic Resource. The findings of a historical resource assessment of the project site will be included in the EIR."*
 - a. HBCSD and PlaceWorks commissioned a Historical Assessment of the North School Campus by Pam Daly & Associates dated May 2016.
 - b. There were six significant errors of information in Pam Daly's research on North School historic buildings. Please see attached two page write-up entitled "Listing of Incorrect Information Presented in the Hermosa Beach City School District's Historical Resource Assessment Report of North School Campus by Daly & Associates, May 11, 2016". The correct information was easily obtained by me through document requests to the California Department of State Architecture. I'm not sure why Pam Daly was unable to or did not obtain the correct information in order to write her Historical Assessment Report of North School.
 - a. According to senior architectural historian, Debi Howell- Ardila (Who co-wrote a 350 page The Los Angeles Unified School District Historical Resource Survey Report 2014 [http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Historic Resources Survey Report June%202014.pdf](http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/domain/135/pdf%20files/Historic%20Resources%20Survey%20Report%20June%202014.pdf)) opinion, the North School buildings qualify for the California Register of Historic Buildings, Criteria 1, as a highly representative example of a 1930's school, as well as Criteria 3, as an outstanding example of WPA-era Art Deco institutional building. Please see attached 2 page email from architectural historian Debi Howell-Ardila, dated May 31, 2016.
 - b. Architect Samuel Lunden who reconstructed North School in 1936 was a historically famous person to Southern California and the South Bay. He designed the Doheney Library at USC in 1932 and the Pacific Stock Exchange in 1930. He was instrumental in routing the Pacific Coast Highway through the city of Hermosa Beach and Manhattan Beach in the 1930s to bring more tourists to the area. UCLA Oral History project did a series of interviews of his life and influence in the South Bay. <https://archive.org/details/personalservicet00lund>
 - c. The California Department of Education, Department of State Architects, encourages schools districts to renovate and use existing building rather than building new when possible.

Item 5. Environmental Analysis, 5.14 Public Services, c): *"Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable services ratios, response time or other performance objectives for any of the public services: Schools?"*

1. *"The new facilities would serve existing 3rd and 4th grade students from Hermosa View and Hermosa Valley elementary schools and relieve overcrowding at these two District schools. Therefore, the project would have a beneficial impact on school facilities. Implementation of the project would not adversely impact the provision of school services by the District. No impact will occur, and this topic will not be analyzed further in the EIR."*
 - a. This is an incorrect statement. HBCSD enrollment at September 2015 was 1,433 students. According to the latest HBCSD demographic study provided by hired consultants Decision Insite, enrollment at HBCSD is projected to decrease by 298 students by 2021. Moreover, according to the State Office of Finance, the birthrate in Los Angeles County is predicted to decrease by 8.7% through 2023. The Los Angeles Unified School District is predicting a 6.5% decrease in K-12 enrollment through 2023. The State Office of Finance reports that the birth rate is declining in Ventura, Los Angeles and Orange Counties.
 - b. HBCSD originally owned and operated six schools in Hermosa Beach, over the years as enrollment declined, HBCSD gifted and sold at a loss three out of six schools, including the District's middle school, Pier Avenue School located in the center of Hermosa Beach. Enrollment at HBCSD has fluctuated from a high of 2,141 students in 1963 to a low enrollment of 620 students in 1986.
 - c. Despite requests from residents, the District has not accurately projected the impact of upkeep, support staff, etc. of an additional campus for 510 students to District finances. All told, HBCSD is planning on adding 28,000 square feet of buildings to the District as enrollment is projected to decline.
 - d. HBCSD lost lease income of \$230,000/year when they evicted Children's Journey from the North School site.
 - e. The District's proposal to build a brand new state-of-the-art school for 510 students at North School also satisfies the District's plan to shift 1st through 2nd grade students currently housed at View School to North School while View School is undergoing renovations. View School students can be shifted to Valley School or to Pier Avenue School instead of overbuilding at North School to accomplish a short-term goal.
 - f. The full text of Ballot Measure S the \$59 million facilities bond that was passed by HBCSD using questionable and possibly illegal methods in June 2016, stated that funds would be used to Renovate, Modernize Existing Classrooms and Buildings and to Construct New Classrooms. North School could be renovated using Measure S bond funds instead of completely demolished and rebuilt at twice the cost to renovate.

Item 5. Environmental Analysis, 5.16 Transportation/Traffic, d): “Substantially increase hazards due to a design feature (e.g. sharp curves, or dangerous intersections) or incompatible uses (e.g. farm equipment)?”

1. *“A traffic impact analysis is being prepared for the proposed project, and the method, findings, and conclusions of the analysis will be carried through to the EIR.”*
 - a. HBCSD and PlaceWorks commissioned a Traffic Impact Analysis for the Proposed North Elementary School 417 25th Street – Hermosa Beach by Garland & Associates dated April 2016.
 - b. The North School Traffic Impact Analysis report was only 20 pages. Other recent traffic analysis in the area: Redondo Union High School Traffic Impact Analysis and Sketchers, Corporation Traffic Impact Analysis in Manhattan Beach were both approximately 180 pages long.
 - c. The Garland & Associates Traffic Impact Analysis for North School only analyzed the prospect of a proposed 400-student campus, not a 510-student campus.
 - d. HBCSD attorney’s spent 1.5 hours on May 2, 2016 to “Review and Evaluate Traffic Study for North School Project, Conference Office Re: Traffic Study”. Why did HBCSD’s hired attorney David Boyer need to “evaluate” HBCSD traffic study? Did Mr. Boyer change or delete information originally contained in the Garland Traffic Analysis Report for North School? What does Mr. Boyer know about traffic analysis, is he a certified traffic analysis expert?
 - e. The Garland & Associates North School Traffic Impact Analysis report was not stamped with Mr. Garland’s professional engineering certification seal. “The purpose and use of professional engineer seals. Upon issuance of a professional license, each holder is required by most states to obtain a seal meeting the state requirements. The purpose of the engineer seal or stamp is to assure the user of the product that the work has been performed or directly supervised by the professional named and to delineate the scope of the professional’s work.”
 - f. The Garland & Associates North School Traffic Impact Analysis did not take into account the effect of additional crossing guards in the area due to the numerous intersections around North School.
 - g. The area directly in front of the proposed drop off area in front of the main buildings at North School on 25th street is bisected by Silverstrand Ave. which will create unsafe conditions for children crossing 25th Street to the campus. There is also an entrance/exit to the parking lot on 25th Street only feet away from the drop off/pick up area and Silverstrand Ave. crossing which would create further unsafe conditions for walking students.
 - h. The intersection at Valley Drive and Gould Street and Ardmere Ave and Gould Street are at odd angles and creates a hazard for walking students and cars crossing the intersection. When visibility is reduced as with rainy conditions or fog this area is particularly hazardous.
 - i. There is a jogging path also known as the Green Belt that bisects the intersections of Valley Drive and Gould Avenue and Ardmere Ave and Gould Avenue. People walk

and jog this path at all hours of the day. Drivers need to navigate the intersection of Valley Drive/Gould Avenue and Ardmore Avenue/Gould Avenue by cranking their heads around at odd angles to view not only oncoming traffic, but also pedestrians crossing the intersection on crosswalks or running or walking on the green belt and crossing at the center of the intersection.

- j. Mira Costa High School is located less than a mile from North School on Gould Avenue/Artesia Blvd. Gould Avenue is a major feeder street that traffic uses in and out of North Hermosa Beach where North School is located. There are many new and inexperienced high school drivers who use this route to drive to Mira Costa High School on a daily basis. This could potentially add to unsafe conditions in the morning when students would be walking, skateboarding and bicycling to North School.

The Initial Study of the proposed North School project by HBCSD identified 48 items out of 83 total items, or 58% of the issues, as being Potentially Significant Impacts. Hermosa City School District has two other options to house students and solve their current desire for additional classrooms and renovated schools: Pier Avenue School for up to 500 students or a renovated North School for up to 300 students. Both options would have potentially less negative impact on our densely populated community and save taxpayers millions of dollars. These options need to be investigated by Placeworks and HBCSD before proceeding with a Draft Environmental Impact Report for the North School Proposal.

Sincerely,

Miyo and Jim Prassas
1753 Valley Park Avenue
Hermosa Beach, CA 90254