

Overland Elementary School
School for Advanced Studies
CA Distinguished School
Parent - Teacher Association Board of Directors

March 1, 2009

EXPO LINE CONSTRUCTION AUTHORITY
Monica Born, PE Projector Director
707 Wilshire Blvd, 34th Floor
Los Angeles, CA 90017

Re: Comments on EXPO LINE PHASE 2 DEIR, state clearinghouse # 2007021109

Dear Ms. Born:

The Overland Avenue Elementary School PTA Board on behalf of our school community submits the following comments to the EXPO Authority. The comments are in response to the DEIR and its **proposed route that would run at grade along the MTA ROW on Exposition Blvd.** The Overland PTA has identified the following issues as needing further study or mitigation for high frequency light rail construction and long-term operation within 100 feet of Overland Elementary School. The DEIR concludes that the following issues of **safety, health, and traffic** are rendered "less than significant" if current mitigations are implemented. We feel these issues outlined below would cause significant impact to our school and campus environment.

SAFETY

- o "Safe Routes to Schools", prepared by LADOT, revised in July of 2008, will need to be substantially revisited to accommodate new traffic signals at Overland and Northvale, and Westwood and Exposition. Safe Routes to Schools is not addressed in the DEIR and we request that it be included in the EIR with a full safety review.
- o The widening of Overland Avenue and Westwood Boulevard would create a smaller "buffer" between children and moving traffic. Narrowing of the sidewalk and parkway would impact ADA compliance of pedestrian routes for LADOT Safe Routes to Schools. The impact of narrower walkways is not addressed in the DEIR and we request that it be included in the EIR with a full safety review.

- o Overland Avenue has already been classified by LADOT as a major arterial highway. The DEIR proposes to have Westwood reclassified as an arterial highway. The traffic patterns that were studied in the DEIR do not indicate the speed at which many cars travel on Overland in both the North and South directions, and the disregard of motorists to posted school zone speed limits. This factor was not documented in the traffic study of the DEIR and we request that driver speed studies be conducted and documented in the EIR. We request a full safety review of this issue.

- o Widened Overland and Westwood roadways will increase the time it takes young children to safely cross the street. The safety issue of children crossing wider streets was not addressed in the DEIR and we request that it be included in the EIR and that traffic lights need to be adjusted to accommodate the increase in pedestrian crossing time. This must be clarified. We request a safety review of this issue by a diagnostic team.

- o The DEIR does not commit to any on-going, specific education plan for track crossings and rail safety for students. Our school population draws primarily from the neighborhood and each fall we have new young students, including the four and five-year old kindergarteners, and younger siblings walking to school. As new students necessarily begin school each year, we request that a commitment be made to an on-going safety program and that such a commitment be made in the EIR.

- o The Overland Drop Off Lane is misidentified in the DEIR, leading to concerns that MTA is not aware of current students' arrival or departure patterns. Safety at the drop off lane will be impacted by greater circulating traffic on all perimeter streets due to reduced parking availability and driver confusion because of street closures. Parent drivers utilizing the Putney Drop Off Lane would encounter an increased number of cars on Northvale and perhaps Putney as vehicles attempt to avoid train-crossing delays. Current traffic on Northvale, Putney, Manning and Ashby is not included in DEIR studies. We request that further traffic studies be done including

Northvale, Putney, Manning, and Ashby as well as the Drop Off lane usage at Overland, during the morning drop off period of 7:50 a.m. to 8:15 a.m., and at school dismissal time 2:20-2:50 PM. We request that the results of this new traffic study to be included in the EIR.

- o Large trucks, and trucks carrying hazardous materials, traveling on Overland Avenue and idling at peak school arrival times will increase because the haul route patterns for Century City and other developments were set prior to proposed Expo traffic changes. The increase of large truck movement was not addressed properly in the DEIR and we request that a full safety review and update to be included the EIR.
- o Increased vehicle presence on all side streets in Overland Elementary School's vicinity including Ashby, Putney, Northvale, Exposition, Esther and Westwood, both circulating and parked, puts all crossings at greater density, including those without crossing guards, signage, or signals. Traffic pattern directions were not adequately addressed and need clarification. The impacts of higher traffic volume on these side streets to children walking to school has not been adequately reported in the DEIR and we request it be addressed in the EIR with a full safety review.
- o Emergency response plans regarding school evacuation to Palms Park Recreation Center on Overland Avenue will be affected. Continual operation of trains during any Overland School emergency creates barriers to access and egress. Bus staging on Overland Avenue will not be possible and the Request/Reunion gate access may be limited by changes in traffic patterns. The DEIR does not include any data with regard to impacts on school evacuation plans and we request that it be addressed, with additional provisions for safety measures, in the EIR with a full safety review.
- o First responder protocols for any rail line incidents at grade crossing could interfere with operation or access to Overland Elementary School. MTA protocols for emergency response on the rail line (due to medical situation, fire, public safety, etc.) in close proximity to Overland

Elementary School could interfere with the operation of or access to the school. Such events could include trail derailment, train collision, train/vehicular collision or train/pedestrian collision. The DEIR does not include sufficient information about impacts to Overland Elementary with regard to rail line incidents and we request that this be addressed in the EIR with a full safety review.

- o Collisions (vehicular or pedestrian) could conceivably directly affect students, staff and/or facilities at Overland Elementary School. The DEIR does not address impacts on Overland Elementary of rail line collisions and we request that it be addressed in the EIR with a full safety review.
- o Due to the short distance between the current signal at Ashby/Overland, and the new proposed signal at Northvale/Overland, car queuing would be a major safety issue to child pedestrians, and would create a condition cited in the MTA's own document 2003 Grade Crossing Policy as a " spillback queue". We feel that a spillback queue, and the widening of Overland as the mitigation, is still a serious enough safety hazard for the MTA Expo Authority to deem Overland Avenue a Grade Separation Crossing. A full Safety review by a "diagnostic team" is necessary to document this identified issue and we request that it be included in the EIR.

HEALTH CONCERNS

Asthmatic children are more susceptible to all of the conditions listed in this section than the general population that was included in DEIR models. There are quite a number of students attending Overland being treated for asthma and other respiratory illnesses. We find the DEIR has insufficient data regarding lungs of all our children. We request that the EIR reflect studies of impacts of this proposed Light Rail and effects on asthmatic children.

- o **The DEIR states some emissions will likely exceed SCAQMD* (South Coast Air Quality Management District) thresholds during construction and are "significant and unavoidable".**

The DEIR offers no mitigations. We find this unacceptable. We request this be addressed in the EIR.

- o The combination of moving and idling cars closer to the curb increases the exposure of young children to vehicular emissions, as their smaller stature places them closer to the source of the emissions. The DEIR does not take the smaller stature of students into account and we request that the EIR reflect the effects of vehicular emissions on students walking to Overland Elementary School.
- o Additional pollution from cars idling at rail crossing or added traffic signals may result in poorer air quality for students en route to school or on school property, especially with the removal of natural air filters including the mature trees along Overland and Westwood Boulevards. This would be true of both construction AND operational phases of the Expo line. Large construction vehicles can generate greater amounts of hazardous emissions. The DEIR does not reflect this impact and we request that the EIR report on the impact of pollution on students at Overland Elementary School during both the construction and operational phases of the Expo Light Rail.
- o Soil, concrete and asphalt removal can cause harmful particulates to be released. The DEIR does not include any current analysis of samples in the area behind the school. We request that the EIR include current analysis of samples in the area behind the school and takes proper measures to eliminate any risks to student health.
- o In the DEIR, hours and days of heavy construction are not proscribed to minimize exposure to Overland Elementary students. We request that the EIR shows a commitment to plan construction in such a way as to avoid exposing students to pollutants and excessive noise.
- o The DEIR indicates that utility poles along Overland Avenue will be relocated to accommodate additional lanes. Between Exposition and Ashby, the only available space to move these poles would be onto the Overland campus Kindergarten yard. This is an unacceptable and significant impact to the school. EMF effects on children are still under study,

but cannot be proven to be completely safe. Pole placement needs to be clarified. We request the EIR include provisions for the utility poles that will not put our children at risk and include a full safety review.

DISRUPTIONS TO STUDENTS AND TEACHERS

STUDENTS WITH SENSITIVITY TO ENVIRONMENTAL CHANGES:

Students who experience changes to the environment with greater sensitivity may have adverse and prolonged reactions to sudden or repetitious sounds, vibrations or other activities, interfering with their ability to function in the school's learning environment and thereby causing disruption to their classmates. Bungalows 18 - 23, which are the closest to the rail line that the DEIR proposes, hold classrooms for Kindergarteners as well as Special Needs students. These are the populations most susceptible to distraction and disruption from noise and vibration. Overall, there are a number of students in all grade-levels at Overland who are considered "on the spectrum" and will be affected by sound, smells and vibrations. We request that the EIR reflect the impact of continuing disruption, during construction and operational phases of the Expo Light rail, on these populations of students.

The DEIR does not address the disruptive impacts of the following noise pollution on the students and teachers at Overland Elementary School:

- o The effects of crossing bells or "quackers" and vehicular horns.
- o The effects of Traction Power Substation proposed for Northvale and Putney area, emitting constant noise unrelated to arrival or departure of trains.
- o The effects of the sound of the trains on the track, especially as they cross Overland Avenue.
- o The effects of "wheel squeal" as the trains move along the curve between Overland and National (the curve is very close to Overland Elementary School).
- o The effects of the sound of cars stopping to accommodate

the arrival of trains as well as traffic signals.

- o The effects of the sound of construction vehicles at work.

The DEIR bases findings regarding noise impacts at school on a one-half hour study of current sound conditions at Overland. We believe the data gathered is inadequate. The DEIR includes a provision for a sound wall on the south side of the tracks only, and no barrier to mitigate the sound of crossing bells or horns. We request that a broader study of current noise at Overland Elementary be taken and that the effects on the school of noise pollution from an at-grade crossing be reflected in the EIR.

- o The effects of underground vibrations due to repetitive travel on tracks

fewer than 100 feet from Bungalows 18 - 23 have not been studied and therefore are not reported in the DEIR. LAUSD's OEHS representatives have not been contacted regarding these buildings. We request that the effect of vibration from the Light Rail on Overland students be studied and reported in the EIR.

- o The effect of teacher parking lot loss on Overland Elementary School's operation, in combination with a loss of street parking on Overland Avenue, throughout the project and on Northvale during the construction phase, especially during peak projected train crossings at beginning of the school day, is not in the DEIR and we request that it be studied, mitigated and reported in the EIR.

ADDITIONAL REQUESTED MITIGATIONS:

We demand the following to mitigate or compensate the community given the issues raised by the DEIR regarding the EXPO Light Rail and our children:

- o That Overland Avenue not be widened or re-stripped for additional lanes and that Westwood Blvd. not be widened or re-stripped.

- o That the Light Rail passes under the street at Overland and Westwood. We see this as the only safe option for MTA to consider and feel that as a 100-year use project, the benefits to the entire community would outweigh the added costs of an underground route. If the Light Rail is put above grade there will still be issues of pollutants, sounds which carry and vibrations. All crossing options need to have substantial data and should be included in the EIR in cooperation with the LAUSD OEHS and community surrounding the ROW.
- o That the station the DEIR proposes at Westwood be designated a Neighborhood Station instead of a Commuter Station, with a "Kiss and Ride" lot instead of a 170 car parking lot, which is inappropriate for our neighborhood and will create additional traffic and safety hazards. The City of Los Angeles owns the land outside of the ROW and has already set it aside as parkland. A public green space along the ROW between Overland and Military would partially mitigate sound and pollution impacts created by the Light Rail and resultant increased traffic flow. Design of the green space should be open and accessible, so as not to become an attractive nuisance or a place to harbor criminal activity. We request this space be addressed in the EIR.
- o A commitment from the MTA to Facility improvements for Overland Avenue Elementary, including: triple-glazed sound-proofed windows in classrooms pursuant to sound studies on the campus, recirculated and HEPA-filtered air-conditioning in all impacted buildings, retrofitting bungalow foundations to withstand vibration of passing trains and traffic, pursuant to vibration studies done on campus, a Sound Wall buffer for our school on the South Side of the school and any additional recommendations made by the LAUSD OEHS. In order to partially mitigate sound and air-quality impacts, additional trees, landscaping and shade structures be added to the campus. If the TPSS is located within .5 miles of our campus, a Sound Wall must be built around it to mitigate its impact on students.

We've been specific about our many concerns we have raised regarding the health, safety and classroom environment for the

children. We request that there be both on-going and post-build evaluation and fixes to ensure that the mitigations are working as designed. We also request that the EXPO/MTA address these several concerns in the EIR instead of simply deflecting responses to be determined at a later date by the Public Utilities Commission.

Sincerely,

Maura Howe, PTA President

Joanne Dorfman, PTA Vice President

Deborah Torgan, PTA Vice President

Stacey Arnold, PTA Vice President

Risa Okin, PTA Parliamentarian

Karen White, PTA Secretary

Cc: Honorable Antonio Villaraigosa, Mayor of Los Angeles
Ms. Marguerite Poindexter LaMotte, LAUSD Board Member
Ms. Julie Korenstein, LAUSD Board Member, Chair of Safety
Committee
Overland Avenue Elementary School PTA