March 2019 | Initial Study

ASCOT AVENUE ELEMENTARY SCHOOL

Comprehensive Modernization Project

Prepared for:

Los Angeles Unified School District

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AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACI	American Concrete Institute
AISC	American Institute of Steel Construction
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
ARMR	Archaeological Resource Management Report
Ascot ES	Ascot Avenue Elementary School
AWS	American Welding Society
BMP	best management practices
BOE	LAUSD Board of Education
C&D	Construction and Demolition
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEFZ	State of California Earthquake Fault Zones
CEQA	California Environmental Quality Act
CHPS	Collaborative for High-Performance Schools
CIWMP	Countywide Integrated Waste Management Plan
CNPS	California Native Plant Society
СО	Carbon Monoxide
CO ₂ e	CO ₂ Equivalent
COCs	Contaminants of Concern
СРА	Community Plan Area
CRHR	California Register of Historical Resources
dBA	A-weighted Decibels
District	Los Angeles Unified School District
DOE	Department of Energy
DOGGR	California Department of Conservation, Division of Oil, Gas, and Geothermal Resources



DPM	Diesel Particulate Matter
DRP	City of Los Angeles Department of Recreation and Park
DSA	California Division of the State Architect
DSA	Division of State Architect
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMS	Energy Management System
EPA	U.S. Environmental Protection Agency
ESCP	Erosion and Sediment Control Plan
FCI	Facilities Condition Index
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FETU	Facilities Environmental Technical Unit
FMMP	Farmland Mapping and Monitoring Program
FRSA	Fault Rupture Study Area
FTA	Federal Transit Administration
FUs	Fixture Units
FY	Fiscal Year
GHG	Greenhouse Gas
НСР	Habitat Conservation Plan
HIN	High Injury Network
HRA	Health Risk Assessment
HRER	Historic Resources Evaluation Report
HVAC	Heating, Ventilation, and Air Conditioning
IECC	International Energy Conservation Code
in/sec	Inches per Second
IPAC	Information, Planning, and Consultation System
IRP	Power Integrated Resources Plan
kVA	Kilo-Volt Amp
LACFD	Los Angeles County Fire Department
LADOT	City of Los Angeles Department of Transportation
LADPW	City of Los Angeles, Department of Public Works
LADPW	Los Angeles Department of Water and Power

LAFD	City of Los Angeles Fire Department
LAMC	City of Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LASPD	Los Angeles School Police Department
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
L _{eq}	Equivalent Sound Level
LRA	Local Responsibility Area
LST	Localized Significance Thresholds
MBTA	Migratory Bird Treaty Act
MCD	Modified Consent Decree
MEP	Maximum Extent Practicable
MND	Mitigated Negative Declaration
MRZ-2	Mineral Resource Zone 2
MS	Main Switchboard
MSL	Mean Sea Level
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NBI	New Buildings Institute
NCCP	Natural Community Conservation Plan
ND	Negative Declaration
NFPA	National Fire Protection Association
NO_2	Nitrogen Dioxide
NO_{X}	Oxides of Nitrogen
NPDES	National Pollutant Discharge Elimination System
NWI	National Wetlands Inventory
O ₃	Ozone
OEHS	Office of Environmental Health and Safety
OHP	Office of Historic Preservation
OSHA	Occupational Safety & Health Administration



Pb	Lead
PCBs	Polychlorinated Biphenyls
PCE	Passenger Car Equivalency
PDFs	Project design features
PEA-E	Preliminary Environmental Assessment Equivalent
PF	Public Facilities
Plan	2017 Climate Change Scoping Plan Update
PM_{10}	Coarse Inhalable Particulate Matter
PM _{2.5}	Fine Inhalable Particulate Matter
ppm	Parts per Million
PPV	Peak Particle Velocity
PRC	California Public Resources Code
PSHA	Pipeline Safety Hazard Assessment
Q1	First Quarter
Q2	Second Quarter
RAW	Remedial Action Workplan
RECs	Recognized Environmental Conditions
RSS	Rail Safety Study
RTP	Regional Transportation Plan
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SC	Standard Condition
SCS	Sustainable Communities Strategy
SEA	Significant Ecological Area
SELA	Southeast Los Angeles
SFPD	School Facilities Planning Division
SO_2	Sulfur Dioxide
SoCAB	South Coast Air Basin
SoCalGas	Southern California Gas Company
SOP	Standard Operating Procedure
SO_x	Oxides of Sulfur

SR	State Route
SRA	State Responsibility Area
SUP	School Upgrade Program
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TK	Transitional Kindergarten
TWA	Total Water Allowance
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
V	Volt
VdB	Vibration Decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
W	Watt



1.1 OVERVIEW

The Los Angeles Unified School District (LAUSD or District) is proposing a comprehensive modernization of Ascot Avenue Elementary School, 1447 E 45th Street, City of Los Angeles, Los Angeles County, California. Comprehensive Modernization Projects are projects designed to address the most critical physical needs of the buildings and grounds at LAUSD campuses. Specifically, the Ascot Avenue Elementary School (Ascot ES) (Campus) Comprehensive Modernization Project will include the replacement, renovation, modernization, and reconfiguration of school buildings and grounds. The proposed Ascot Avenue Elementary School Comprehensive Modernization Project (Project) is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study provides an evaluation of the potential environmental consequences associated with this proposed Project.

1.2 BACKGROUND

On July 31, 2008, the LAUSD Board of Education (BOE) adopted a Resolution Ordering an Election and Establishing Specifications of the Election Order for the purpose of placing Measure Q, a \$7 billion bond measure, on the November election ballot to fund the renovation, modernization, construction, and expansion of school facilities. On November 4, 2008, the bond passed. The nationwide economic downturn in 2009 resulted in a decline in assessed valuation of real property, which restricted the District's ability to issue Measure Q bonds and the remaining unissued Measures R and Y funds. Once assessed valuation improved, the BOE could authorize the issuance of bond funds.¹

On December 10, 2013, the District refined their School Upgrade Program (SUP) to reflect the intent and objectives of Measure Q as well as the updated needs of District school facilities and educational goals.² Between July 2013 and November 2015, the SUP was analyzed under CEQA criteria in a Program Environmental Impact Report (Program EIR).³ On November 10, 2015, the BOE certified the Final SUP Program EIR.⁴

On December 13, 2016, the BOE approved the project definition for the Ascot Avenue Elementary School proposed Project to provide facilities that are safe, secure, and better aligned with the current instructional

¹ LAUSD. 2013. Board of Education Report. Report. 13/14 ed. Vol. 143. Los Angeles, CA: LAUSD.

² Ibid.

³ LAUSD. 2015. School Upgrade Program Environmental Impact Report. Available at: http://achieve.lausd.net/ceqa

⁴ LAUSD. 2015. LAUSD Board of Education Report- LAUSD Regular Meeting Stamped Order Of Business. Report. 15/16 ed. Vol. 159. Los Angeles, CA: LAUSD.

program. The proposed Project is designed to address the most critical physical concerns of the building and grounds at the Campus while providing renovations, modernizations, and reconfiguration as needed.⁵

1.3 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the CEQA⁶ and the State CEQA Guidelines.⁷ CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

LAUSD is the lead agency for this proposed Project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed Project.

California Public Resources Code (PRC) Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies." In this case, LAUSD has determined that an initial study is required to determine whether there is substantial evidence that construction and operation of the proposed Project would result in environmental impacts. An initial study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project.⁸

When an initial study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR.⁹ However, if all impacts are found to be less-than-significant or can be mitigated to a less-thansignificant level, the lead agency can prepare a ND or MND that incorporates mitigation measures into the project.¹⁰

1.4 ENVIRONMENTAL PROCESS

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and



⁵ LAUSD. 2014. LAUSD Board of Education Report- Amendment to the Facilities Services Division Strategic Execution Plan to Approve Project Definitions for 11 Comprehensive Modernization Project. Report. 16/17 ed. Vol. 205. Los Angeles, CA: LAUSD.

⁶ California Public Resources Code, §21000 et seq.

⁷ California Code of Regulations, Title 14, Division 6, Chapter 3, §15000 et seq.

⁸ Ibid.

⁹ California Code of Regulations, Title 14, Division 6, Chapter 3, §15064.

¹⁰ California Code of Regulations, Title 14, Division 6, Chapter 3, §15070.

amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100-65700.

- 2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- 3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies (California Code of Regulations [CCR] § 15378[a]).

The proposed actions by LAUSD constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.4.1 Initial Study

This Initial Study was prepared in accordance with CEQA and the CEQA Guidelines, as amended, to determine if the Project could have a significant impact on the environment. The purposes of this Initial Study, as described in the State CEQA Guidelines Section 15063, are to (1) provide the lead agency with information to use as the basis for deciding whether to prepare an EIR or ND; (2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; (3) assist the preparation of an EIR, if one is required; (4) facilitate environmental assessment early in the design of a project; (5) provide documentation of the factual basis for the finding in an ND that a project will not have a significant effect on the environment; (6) eliminate unnecessary EIRs; and (7) determine whether a previously prepared EIR could be used with the project. The findings in this Initial Study have determined that an MND is the appropriate level of environmental documentation for this Project.

1.4.2 Mitigated Negative Declaration

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed Project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A preliminary list of the environmental topics that have been identified for study in the MND is provided in the Initial Study Checklist (Chapter 4).

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the District. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and public meetings.

1.4.3 Tiering

This type of project is one of many that were analyzed in the LAUSD SUP Program EIR that was certified by the LAUSD BOE on November 10, 2015.¹¹ LAUSD's SUP Program EIR meets the criteria for a Program EIR under CEQA Guidelines Section 15168 (a)(4) as one "prepared on a series of actions that can be characterized as one large project and are related ... [a]s individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

The Program EIR enables LAUSD to streamline future environmental compliance and reduces the need for repetitive environmental studies.¹² The Program EIR serves as the framework and baseline for CEQA analyses of later projects through a process known as "tiering." Under CEQA Guidelines Sections 15152(a) and 15385, "Tiering" refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a program) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.¹³

The Program EIR is applicable to all projects implemented under the SUP. The Program EIR provides the framework for evaluating environmental impacts related to ongoing facility upgrade projects planned by the District.¹⁴ Due to the extensive number of individual projects anticipated to occur under the SUP, projects were grouped into four categories based on the amount and type of construction proposed. The four categories of projects are as follows:¹⁵

- Type 1 New Construction on New Property
- Type 2 New Construction on Existing Campus
- Type 3 Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation
- Type 4 Operational and Other Campus Changes

The proposed Project is categorized as Type 2 – New Construction on Existing Campus, which includes demolition and new building construction on existing campuses and the replacement of school buildings on the same location; and Type 3 – Modernization, Repair, Replacement, Upgrade, Remodel, Renovation, and Installation, which includes modernization and infrastructure upgrades. The evaluation of environmental impacts related to Type 2 and Type 3 projects, and the appropriate project design features and mitigation measures to incorporate, are provided in the Program EIR.



¹¹ LAUSD. 2015. School Upgrade Program Environmental Impact Report. Available at: http://achieve.lausd.net/ceqa

¹² Ibid.

 $^{^{13}}$ California Code of Regulations Title 14, § 3 Article 1-15152(a).

¹⁴ Ibid, at 4-8.

¹⁵ Ibid, at 1-7.

The proposed Project is considered a site-specific project under the Program EIR; therefore, this MND is tiered from the SUP Program EIR. The Program EIR is available for review online at <u>http://achieve.lausd.net/ceqa</u> and at LAUSD's Office of Environmental Health and Safety (OEHS) main office at 333 South Beaudry Avenue, 21st Floor, Los Angeles, CA 90017.

1.4.4 Project Plan and Building Design

The proposed Project is subject to the California Department of Education (CDE) design and siting requirements, and the school architectural and engineering designs are subject to review and approval by the California Division of the State Architect (DSA). The proposed Project, along with all other SUP-related projects, is required to comply with specific design standards and sustainable building practices. Certain standards assist in reducing environmental impacts, such as the California Green Building Code (CALGreen Code),¹⁶ LAUSD Standard Conditions of Approval (SC), and the Collaborative for High-Performance Schools (CHPS) criteria.¹⁷

California Green Building Code. Part 11 of the California Building Standards Code is the California Green Building Standards Code, also known as the CALGreen Code. The CALGreen Code is a statewide green building standards code and is applicable to residential and non-residential buildings throughout California, including schools. The CALGreen Code was developed to reduce GHG from buildings; promote environmentally responsible, cost-effective, healthier places to live and work; reduce energy and water consumption; and respond to the environmental directives of the Department of Housing and Community Development.

Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects. Standard Conditions of Approval for District Construction, Upgrade, and Improvement Projects (SCs) were adopted by the BOE on February 5, 2019 (Board Report Number 241-18/19). SCs are environmental standards that are applied to District construction, upgrade, and improvement projects during the environmental review process by the OEHS CEQA team to offset potential environmental impacts. The SCs were largely compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs. For each SC, applicability is triggered by factors such as the project type and existing conditions. These SCs are implemented during the planning, construction, and operational phases of the projects. The BOE adopted a previous version of the SCs on November 10, 2015 (Board Report Number 159-15/16). They were originally compiled as a supplement to the Program EIR for the SUP, which was certified by the BOE on November 10, 2015 (also Board Report No. 159-15/16). The most recently adopted SCs were updated in order to incorporate and reflect recent changes in the laws, regulations and the District's standard policies, practices and specifications (e.g., the Design Guidelines and Design Standards, which are routinely updated and are referenced throughout the Standard Conditions).

¹⁶ California Green Building Standards Code, Title 24, Part 11.

¹⁷ The Board of Education's October 2003 Resolution on Sustainability and Design of High Performance Schools directs staff to continue its efforts to ensure that every new school and modernization project in the District, from the beginning of the design process, incorporate CHPS (Collaborative for High Performance Schools) criteria to the extent possible.

Collaborative for High-Performance Schools. The proposed Project would include CHPS criteria points under seven categories: Integration, Indoor Environmental Quality, Energy, Water, Site, Materials and Waste Management, and Operations and Metrics. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create a better educational experience for students and teachers by designing the best facilities possible. CHPS-designed facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines. The design team would be responsible for incorporating sustainability features for the proposed Project, including onsite treatment of stormwater runoff, "cool roof" building materials, lighting that reduces light pollution, water and energy-efficient design, waterwise landscaping, collection of recyclables, and sustainable and/or recycled-content building materials.

Project Design Features. Project design features (PDFs) are environmental protection features that modify a physical element of a site-specific project and are depicted in a site plan or documented in the project design plans. PDFs may be incorporated into a project design or description to offset or avoid a potential environmental impact and do not require more than adhering to a site plan or project design. Unlike mitigation measures, PDFs are not special actions that need to be specifically defined or analyzed for effectiveness in reducing potential impacts.

Mitigation Measures. If, after incorporation and implementation of federal, state, and local regulations; CHPS prerequisite criteria; PDFs; and SCs, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less than significant levels. Mitigation under CEQA Guidelines Section 15370 includes

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, state, and local laws and regulations; PDFs; and SCs.

The specific CHPS prerequisite criteria and LAUSD SCs are identified in the tables under each CEQA topic.¹⁸ Federal, state, regional, and local laws, regulations, plans, and guidelines; CHPS criteria; PDFs; and SCs are considered part of the Project and are included in the environmental analysis.

¹⁸ CHPS criteria are summarized. The full requirement can be found at http://www.chps.net/dev/Drupal/California.



1.5 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of *no impact* is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered *less than significant* if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered *potentially significant* if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR is required.

1.6 ORGANIZATION OF THE INITIAL STUDY

The content and format of this report are designed to meet the requirements of CEQA and the State CEQA Guidelines. The conclusions in this Initial Study are that the proposed Project would have no significant impacts with the incorporation of mitigation. This report contains the following sections:

Chapter 1, *Introduction* identifies the purpose and scope of the MND and supporting Initial Study and the terminology used.

Chapter 2, *Environmental Setting* describes the existing conditions, surrounding land uses, general plan designations, and existing zoning at the proposed Project site and surrounding area.

Chapter 3, *Project Description* identifies the location, provides the background, and describes the scope of the proposed Project in detail.

Chapter 4, *Environmental Checklist and Analysis* presents the LAUSD CEQA checklist, an analysis of environmental impacts, and the impact significance finding for each resource topic. This section identifies the CHPS criteria, PDFs, Standard Conditions of Approval, and mitigation measures, as applicable. Bibliographical references and individuals cited for information sources and technical data are footnoted throughout this CEQA Initial Study; therefore, a stand-alone bibliography section is not required.

Chapter 5, *List of Preparers* identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.

Appendices have data supporting the analysis or contents of this CEQA Initial Study.

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2.1 PROJECT LOCATION

The approximately 5.3-acre school site is located at 1447 E 45th Street (Assessor Parcel Number [APN] 5107-005-909) in the Central Alameda neighborhood of the Southeast Los Angeles (SELA) Community Plan Area in the City of Los Angeles in Los Angeles County. Regional access to the site is from Interstate-10 or Interstate-110 (see Figure 1, *Project Vicinity Map*). The proposed Project site is located approximately 1.4 miles south of the Santa Monica Freeway (Interstate-10) and approximately 1.8 miles east of the Harbor Freeway (Interstate 110) and is accessed via E Vernon Avenue near Ascot Avenue or E 45th Street from Compton Avenue.

The campus is bound by E Vernon Avenue to the north, Ascot Avenue to the east, 46th Street and 45th Street to the south, and Compton Avenue to the west (Figure 2, *Project Location Map*). The Ascot ES campus is located on the U.S. Geological Survey (USGS) 7.5-minute series Los Angeles quadrangle, in the southwest quarter section of section 9, township 2S, range 13W; and northwest quarter section of section 16, township 2S, range 13W (Figure 3, *Topographic Map with USGS 7.5-Minute Quadrangle Index*).¹⁹

The nearest transit access points to the Project site are bus access at the Vernon/Ascot bus stop at the northwestern portion of the site for Los Angeles County Metropolitan Transportation Authority (LA Metro) Bus Route 105; bus access at the Compton/Vernon bus stop across the street from the Project site at the southeastern corner of E Vernon Avenue and Compton Avenue for LA Metro Bus Routes 105, 611, and 55/202/344; and rail access at Vernon Station (LA Metro Blue Line), which is located approximately 0.3 mile east of the Project site. An LAUSD school bus stop is located on Ascot Avenue, immediately north of the crosswalk at E 45th Street and to the west of the campus track and Building 2. Crosswalks provide pedestrian access to the sidewalk surrounding the Project site at the intersections of Ascot Avenue and E Vernon Avenue, E Vernon Avenue and Compton Avenue, and E 45th Street and Ascot Avenue. Before school starts, students can enter the campus from gates on Ascot Avenue and E 45th Avenue near Compton Avenue. During school hours, student access is only available from E 45th Avenue near Compton Avenue through the administration building (Building 1). Emergency fire access and service access are available through two gated vehicular access points at E Vernon Avenue.

2.2 SURROUNDING LAND USES

Land uses in the general vicinity of the Ascot ES campus include mostly residential uses, with five churches located within one block of the school. The nearest residence to the Project site is 18.2 feet south of the site, on the opposite site of the alley south of the Project site (Figure 4, *Sensitive Receptors*; see Figure 2). To the north of the Project site along E Vernon Avenue are single-story and two-story residential buildings and three single-story commercial buildings: Moise's Mini Market, Arevalo Jumpers Party Rentals, and Taqueria La Carreta. To

¹⁹ U.S. Geological Survey. 1967. 7.5-minute series Los Angeles, CA topographic quadrangle. Reston, VA.

the east of the Project site along Compton Avenue are Laundry Lavanderia, New Donut, Water Agua, singlestory residences, and Arai's Panaderia & Market. To the southeast of the Project site along E 45th Avenue are Israel Baptist Church (immediately east of the alley), Israel Baptist Church Annex, and single-story and twostory residences. To the south of the Project site (immediately south of the alley) are single-story and twostory residences. To the west of the Project site along Ascot Avenue are single-story residences and Abyssinia Baptist Church.

According to the SELA Community Plan, which is a part of the Land Use Element of the City of Los Angeles General Plan, medium density residential uses are located north of the Project site (on the opposite side of E Vernon Avenue), with "Low Medium I" density residential uses immediately south of the Project site (on the opposite side of an alley) and "Low Medium II" density residential uses west of the Project site (on the opposite side of Ascot Avenue).²⁰ To the east of the Project site are community commercial uses, and to the southeast of the Project site are neighborhood commercial uses.

2.3 CAMPUS HISTORY

As stated in the Historic Resources Evaluation Report (HRER) for the Project site, the Ascot ES campus is located in the Central Alameda neighborhood and the City of Los Angeles' SELA Community Plan Area (see Appendix A, *Historic Resources Evaluation Report*).²¹ The Project site opened as an elementary school site on July 1, 1896.²² Before Ascot ES, the Vernon Avenue School was established at the portion of the Project site north of existing Building 1 circa 1904–1905, comprising a one-room, two-story frame school building at the approximate location of existing Buildings 5, 6, 9, and 14. In 1906, Vernon Avenue School occupied the northernmost portion of the present school site, comprising 10 wood-framed buildings—6 "school room" buildings, 3 lavatories, and 1 ancillary building—situated on two parcels fronting the south side of Vernon Avenue, between Ascot Avenue and Compton Avenue (see Figure 12 in Appendix A). Single-family residences were developed on the southern two-thirds of the Project site by 1906, on the north and south sides of E 45th Street, which still traversed the Project site, and surrounding the Vernon Avenue School.

The Vernon Avenue School was expanded between 1924 to the 1930s in response to demand for new school facilities following extensive population growth in the City of Los Angeles. The 1924 to 1930s expansion included a new two-story L-shaped main building (now Building 2/Auditorium & Classroom Building) designed in 1925 by Ruoff & Munson with an auditorium, eight classrooms, and a "teacher's room," after acquisition of new land along the north side of E 45th Street. The 11 residential properties on the Project site along the north side of E 45th Street and Compton Avenue were acquired for the expansion of the Vernon Avenue School in the 1920s and 1930s into one entire block bound by E Vernon Avenue to the north, Compton Avenue to the east, E 45th Street to the south, and Ascot Avenue to the west (see Figure 14 in Appendix A).



²⁰ Los Angeles Department of City Planning. 22 November 2017. Southeast Los Angeles Community Plan. General Plan Land Use Map: A Part of the General Plan of the City of Los Angeles. Available at: http://situalanaias.heim.org/complan.complan.complan.edf

http://cityplanning.lacity.org/complan/central/PDF/SEL_GenPlan.pdf

²¹ LAUSD. 2018. Ascot Elementary School: Historical Resources Evaluation Report. Prepared by Rincon Consultants, Inc. Los Angeles, CA.

²² California Department of Education. n.d. California School Directory: Ascot Avenue Elementary. Available at: https://www.cde.ca.gov/schooldirectory/details?cdscode=19647336015887. Accessed 15 January 2019.

In 1932, a new wing was added to the eastern side of the 1925 building, replacing a two-story, wood-framed building (likely built prior to 1905) with a two-story facility running parallel to E 45th Street, at approximately the current location of existing Building 1.²³

As a result of the 1933 Long Beach earthquake that destroyed 40 unreinforced masonry school buildings and required the removal of all damaged or "precariously placed" chimneys, parapets, fire walls, and ornamentation on the Project site, only the portion of existing Building 2 that was constructed in 1925 currently remains on the Project site.²⁴ The setting of the Auditorium & Classroom Building has substantially changed since the building was originally constructed in 1925. Vernon Avenue School was one of many campuses in the District that required reconstruction and/or rehabilitation in the aftermath of the Long Beach earthquake. The school was renamed to Ascot Avenue School by the time of post-earthquake building rehabilitation. In 1936, plans were approved for structural strengthening of the 1925 Auditorium & Classroom Building (existing Building 2), and alterations were made to the brick building including the addition of new structural elements, the application of gunite and plaster to the exterior walls, and the installation of a concrete replacement parapet.²⁵

The HRER found that these alterations to the Auditorium & Classroom Building as a historic representation of pre-1933 Long Beach earthquake school plants substantially changed the original 1925 design of the building, and while most pre-1933 schools were substantially altered following the earthquake, the Auditorium & Classroom Building was altered further following the construction, demolition, and subsequent construction of an attached building to its east elevation. The newly connected building was physically adjoined to the ground and upper levels of the prominent eastern elevation of the Auditorium & Classroom Building and resulted in the further compromise of the building's original design intent. As a result, the building no longer retains integrity of setting, design, materials, workmanship, feeling, or association identified in the *LAUSD Historic Context Statement*, 1870-1969 for schools from this era, and it does not appear eligible for federal, state, or local designation.²⁶

The Lunch Shelter (Building 15) was constructed in 1941. Between 1949 and 1970, 11 relocatable buildings were placed on the Project site (Buildings 4, 5, 10, 11, 16, 17, 18, 19, 20, 21, 22, 23), 9 of which now constitute the former Iris Arco Primary Center and have been incorporated into the elementary school. Between 1965 and 1968, single-story Cafeteria (Buildings 3 and 13) and Kindergarten buildings (Building 8) were constructed, as well as two-story Sanitary / Classroom and Classroom buildings (Buildings 6, 7, and 9). Between 1979 and 1983, Ascot ES acquired a portion of the E 45th Street right-of-way and a row of 11 single- and multi-family residential properties situated along the street's southern frontage, separating E 45th Street into two segments and creating the current boundary of the Ascot ES (see Figure 16 in Appendix A). Underground utilities continue to follow the original alignment of E 45th Street below the Project site. The last two major structures built on the Project site are the Administrative / Classroom (Building 1) built in 1977 and the three-story Classroom Building with 18 classrooms (Building 14), which was built in 2004. The Campus was found ineligible for listing as a historic district because construction was completed intermittently over a period of 80-

²³ Environmental Data Resources, Inc.. n.d. Certified Sanborn Map Report (maps dated 1928 and 1938).

²⁴ LAUSD. 2014. LAUSD Historic Context Statement, 1870-1969. Prepared by Sapphos Environmental, Inc.

²⁵ LAUSD. n.d. Vault Drawings (Strengthening and Reconstruction of the Main Brick Building 1936).

²⁶ LAUSD. 2014. LAUSD Historic Context Statement, 1870-1969. Prepared by Sapphos Environmental, Inc.

plus years and resources at the property do not represent a cohesive design plan. Therefore, the building is not considered a historical resource for the purposes of CEQA.

2.4 EXISTING CONDITIONS

The 5.3-acre Ascot ES campus contains 10 permanent building and 12 portable buildings to serve grades transitional kindergarten (TK) through fifth (Table 1, *Characteristics of Existing Buildings*; Figure 5, *Existing Site Plan*). The campus is characterized by expansive paved areas with little to no tree canopy coverage and a lack of landscape uniformity, with only a handful of planting areas. There are four existing playground areas on the campus, comprising a total of 85,100 square feet (approximately 1.95 acres; Figure 6, *Existing P.E./Playground Areas*). The playground areas are mostly paved, with rubber surfaces below three jungle gyms and one 6,710-square-foot turf area provided along Ascot Avenue for soccer. Overhead electrical distribution lines are located approximately 20 feet south and 9 feet west of the Project site, on the opposite side of the alley and on the sidewalk along Ascot Avenue.²⁷ Additionally, one wooden electrical distribution line pole is located in the northwestern corner of the Project site (in the teacher parking lot). An existing 25-foot-wide City of Los Angeles underground storm drain/sewer utility easement exists in the vacated portion of 45th Street. The highest point on the Project site is 199 feet above mean sea level (MSL) in the southwestern portion of the campus, and the lowest is 193 feet above MSL in the center and eastern portions of the campus (see Figure 2). The entire campus is enclosed by a chain-link fence.

Building ID	Building DSA Number	Building Name	Year Built	Building Square Footage	Building Type
Buildings to B	e Demolished/Remov	ed			
1	A38894	Administrative / Classroom Building	1977	20,561	Permanent
2	A1388	Auditorium & Classroom Building	1925	16,890	Permanent
3	A29210	Cafeteria Building	1968	2,159	Permanent
7	No DSA	Storage Unit	1965	360	Permanent
13	A29210	Lunch Shelter	1968	1,775	Permanent
15	A19173	Lunch Shelter (Former M0491K)	1941	768	Permanent
Portable Build	lings to Be Removed				
4	A17688	Two/Three Unit Relocatable Building	1958	1,776	Portable
5	A17698	Two/Three Unit Relocatable Building	1958	1,776	Portable
10	A7198	Two/Three Unit Relocatable Building	1949	1,807	Portable

TABLE 1 CHARACTERISTICS OF EXISTING BUILDINGS

²⁷ California Energy Commission. 2016. Local Reliability Areas with Transmission Lines and Substations for 2016. Enlargement Area: Los Angeles. Available at: https://www.energy.ca.gov/maps/



	Building DSA		Year	Building Square	
Building ID	Number	Building Name	Built	Footage	Building Type
11	A10405	Two/Three Unit Relocatable Building	1953	1,807	Portable
16	A7110	Single Unit Relocatable	1949	912	Portable
17	A7110	Single Unit Relocatable	1949	912	Portable
18	A11177	Sanitary Relocatable Building	1953	912	Portable
19	A17016	Two/Three Unit Relocatable	1958	1,792	Portable
20	A18471	Two/Three Unit Relocatable	1959	1,792	Portable
21	A21230	Two/Three Unit Relocatable	1961	1,112	Portable
22	No DSA	Food Services Relocatable Building	1965	176	Portable
23	A32477	Single Unit Relocatable	1970	887	Portable
Buildings to R	emain ¹				
6	A29210	Sanitary & Classroom Building	1968	4,041	Permanent
8	A25069	Kindergarten Building	1965	1,999	Permanent
9	A29210	Classroom Building	1968	3,604	Permanent
14	No DSA	3-Story Parking & Classroom Building	2004	36,251	Permanent

NOTE:

1. These buildings would receive interior and exterior paint and finish upgrades.

SOURCE:

Historic Resources Evaluation Report (see Appendix A).

Los Angeles Unified School District. January 18, 2019. Ascot Avenue Elementary School Space Program (Preliminary). Project No. 10368157. Location Code: 2219.

LAUSD 2019.

School classes start at 7:50 a.m. and end at 2:14 p.m., except on Tuesdays when school ends at 1:14 p.m. There are a total of 59 classrooms (56 standard and 3 small classrooms) and 83 staff parking spaces on the Project site.²⁸ For the 2018–2019 school year, there are 80 staff at Ascot ES.²⁹ Three buses provide student drop-off and pick-up for special education students along Compton Avenue. During the 2017–2018 enrollment year, the Ascot ES campus served 870 elementary school students (Table 2, *Enrollment at Ascot ES, 2014–2018*). For the 2018–2019 school year, the total number of K-5 student enrollment is 815, plus an additional 30 TK students.³⁰

²⁸ LAUSD. 27 September 2018. Classification Report as of September 14, 2018. Electronically signed by Celia Mata-Pacheco, Principal. Capacity Assessment Summary 2018-2019.

²⁹ Campbell, Alexis, LAUSD. 10 December 2018. Email to Laura Male, Sapphos Environmental, Inc. Subject: 2018-2019 Ascot ES Baseline Conditions.

³⁰ LAUSD. 27 September 2018. Classification Report as of September 14, 2018. Electronically signed by Celia Mata-Pacheco, Principal. Capacity Assessment Summary 2018-2019.

Grade	2014–2015 School Year	2015–2016 School Year	2016–2017 School Year	2017–2018 School Year
к	177	143	224	214
1	150	138	119	135
2	158	147	139	131
3	152	150	139	127
4	159	145	146	132
5	140	144	136	131
Total Enrollment	936	867	903	870

TABLE 2
ENROLLMENT AT ASCOT ES, 2014–2018

NOTE:

This table displays annual K–12 public school enrollment at Ascot ES. It does not include preschool (TK) enrollment. **SOURCE:**

California Department of Education. Enrollment Multi-Year Summary by Grade – Ascot Avenue Elementary School. Available at: https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdYears.aspx?cds=19647336015887&agglevel=School&year=201 4-15&ro=y&ro=y Accessed 8 January 2019.

2.5 GENERAL PLAN AND EXISTING ZONING

The existing zoning designation for the site is Public Facilities (PF) (Figure 7, *General Plan Land Use Map*).³¹ Public elementary and secondary schools are an allowable use in the PF zone, according to the City of Los Angeles Municipal Code – Chapter I, *Planning & Zoning*.³² As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.³³

General Plan land use designations for the properties surrounding the Project site include "Medium Residential" to the north, "Neighborhood Commercial" to the east and southeast, "Low Medium I Residential" to the south and southwest, and "Low Medium II Residential" to the west and northwest.

The City of Los Angeles Municipal Code – Zoning Plan has designated the properties surrounding the Project site with "Multiple Residential" (R2, RD1.5, RD2, and R4) zoning designations to the north, west, and south, and a "Commercial – C2" zoning designation to the east and southeast (Figure 8, *Zoning Map*).



³¹ City of Los Angeles Department of City Planning. n.d ZIMAS. Available at: http://zimas.lacity.org/. Accessed 9 January 2019.

³² City of Los Angeles Municipal Code – Chapter I, Planning & Zoning. Section 12.04.09, "PF" Public Facilities Zone.

³³ LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

2.6 NECESSARY APPROVALS

It is anticipated that approval required for the proposed Project would include, but may not be limited to, those listed below.

Responsible Agencies

A "Responsible Agency" is defined as a public agency other than the lead agency that has discretionary approval power over a project (CEQA Guidelines §15381). The Responsible Agencies, and their corresponding approvals, for individual projects to be implemented as part of the SUP may include the following:

- California Department of General Services, Division of State Architect (DSA). Approval of site-specific construction drawings. Plan review and construction oversight, including structural safety, fire and life safety, and access compliance.
- California Department of Transportation (Caltrans): Transportation permit for oversized vehicles on State highways for construction phase
- Los Angeles Regional Water Quality Control Board (LARWQCB). General Construction Activity Permit, including the Storm Water Pollution Prevention Plan.
- South Coast Air Quality Management District (SCAQMD): May review the applicable technical analysis, and review/file submittals for rules (as applicable)
- California Department of Education (CDE) school facilities planning division (SFPD): project review
- State Water Resources Control Board (SWRCB): Review of applicable permit coverage. Construction Permit regulates stormwater and non-stormwater discharges associated with construction activities
- City of Los Angeles, Department of Public Works (LADPW) Bureau of Engineering. Approval of plans for emergency access and emergency evacuation
- City of Los Angeles, Fire Department. Approval of plans for emergency access and emergency evacuation.
- City of Los Angeles, Department of Building & Safety. Approval of haul route for construction phase.

Trustee Agencies

"Trustee Agencies" include those agencies that do not have discretionary powers, but that may review the EIR for adequacy and accuracy. Potential Reviewing Agencies for individual projects to be implemented under the SUP may include the following:

State

- California Office of Historic Preservation
- California Department of Transportation
- California Resources Agency
- California Department of Conservation
- California Department of Fish & Wildlife
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol

Regional

- Metropolitan Transportation Authority
- South Coast Air Quality Management District
- Southern California Association of Governments

Local

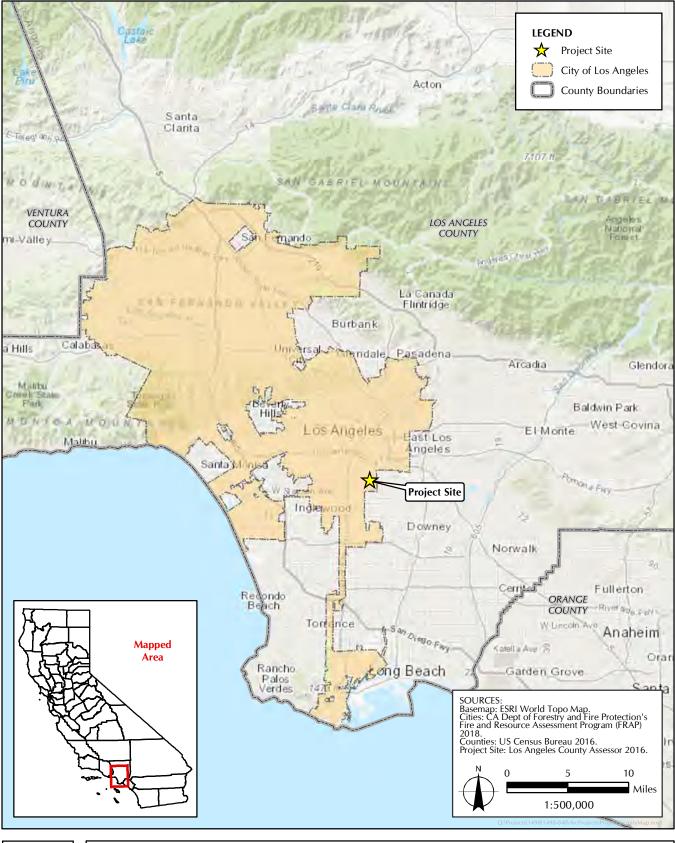
- City of Los Angeles Department of Planning
- City of Los Angeles Police Department
- City of Los Angeles Department of Water and Power
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Environmental Affairs

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? (One tribe has requested consultation with the District.)

One request for consultation on the proposed Project was received from Brandy Salas of the Gabrieleno Band of Mission Indians - Kizh Nation on January 9, 2019. The consultation date was set for March 21, 2019.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 21083.3.2). Information may also be available from the California Native American Heritage Commission's Sacred Lands File per PRC Section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that PRC Section 21082.3(c) contains provisions specific to confidentiality.







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FIGURE 2
Project Location Map

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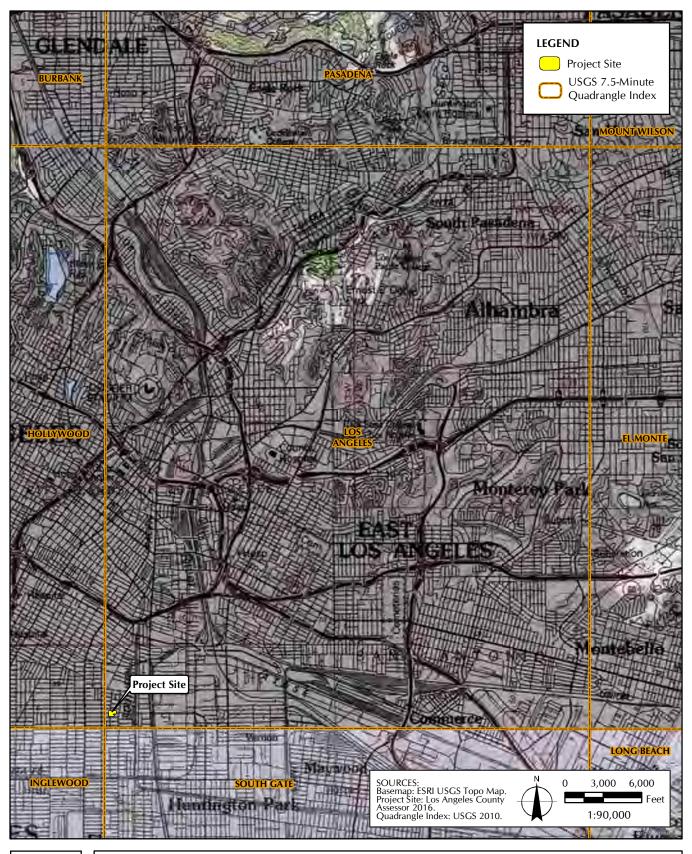
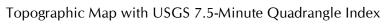


FIGURE 3





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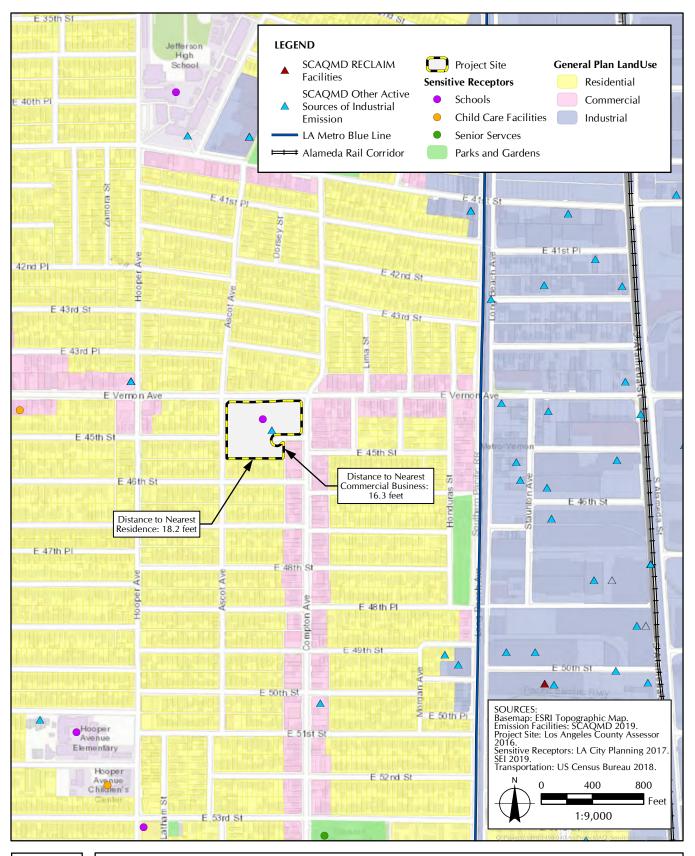




FIGURE 4 Sensitive Receptors

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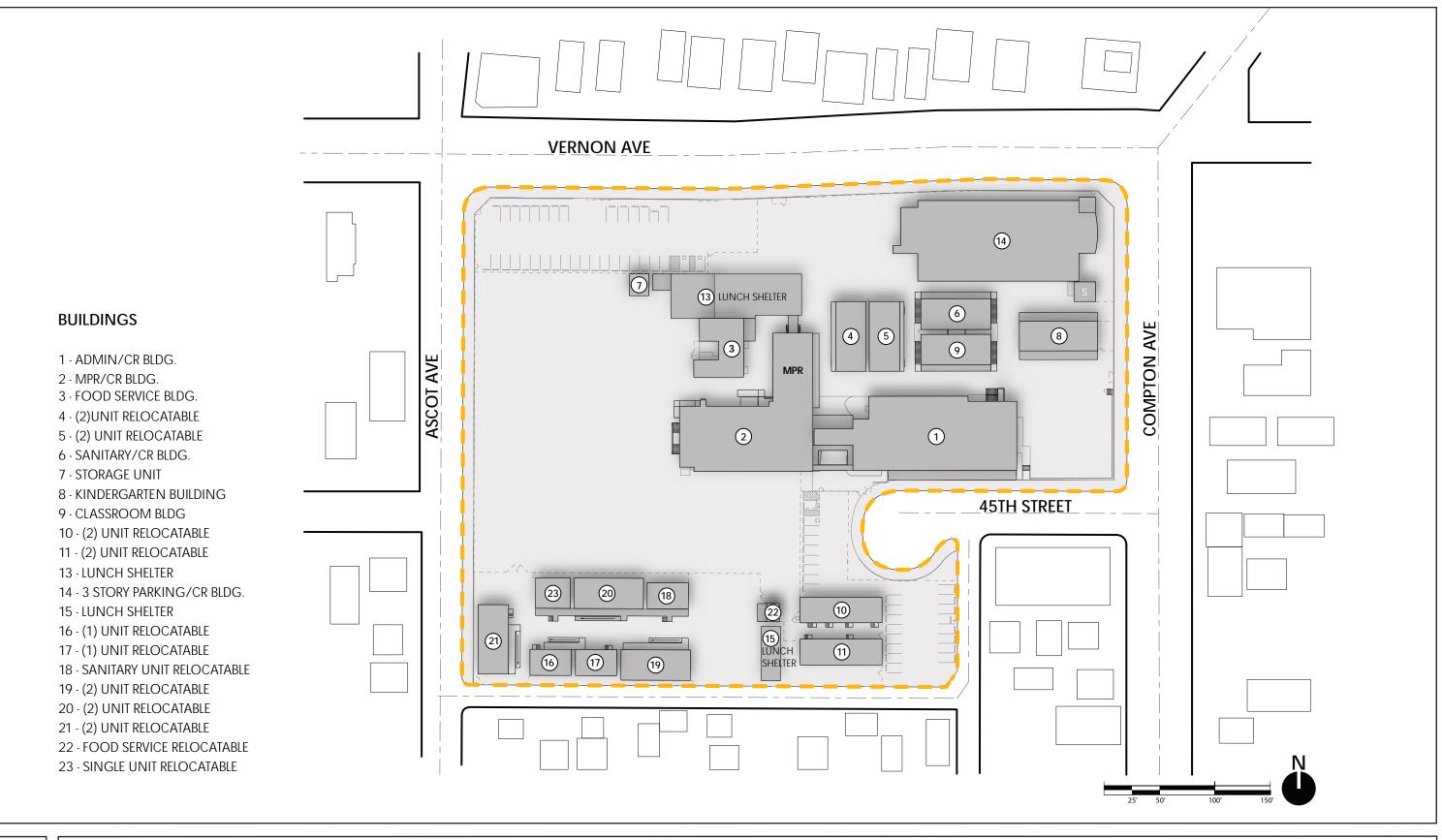




FIGURE 5 Existing Site Plan

2. Environmental Setting



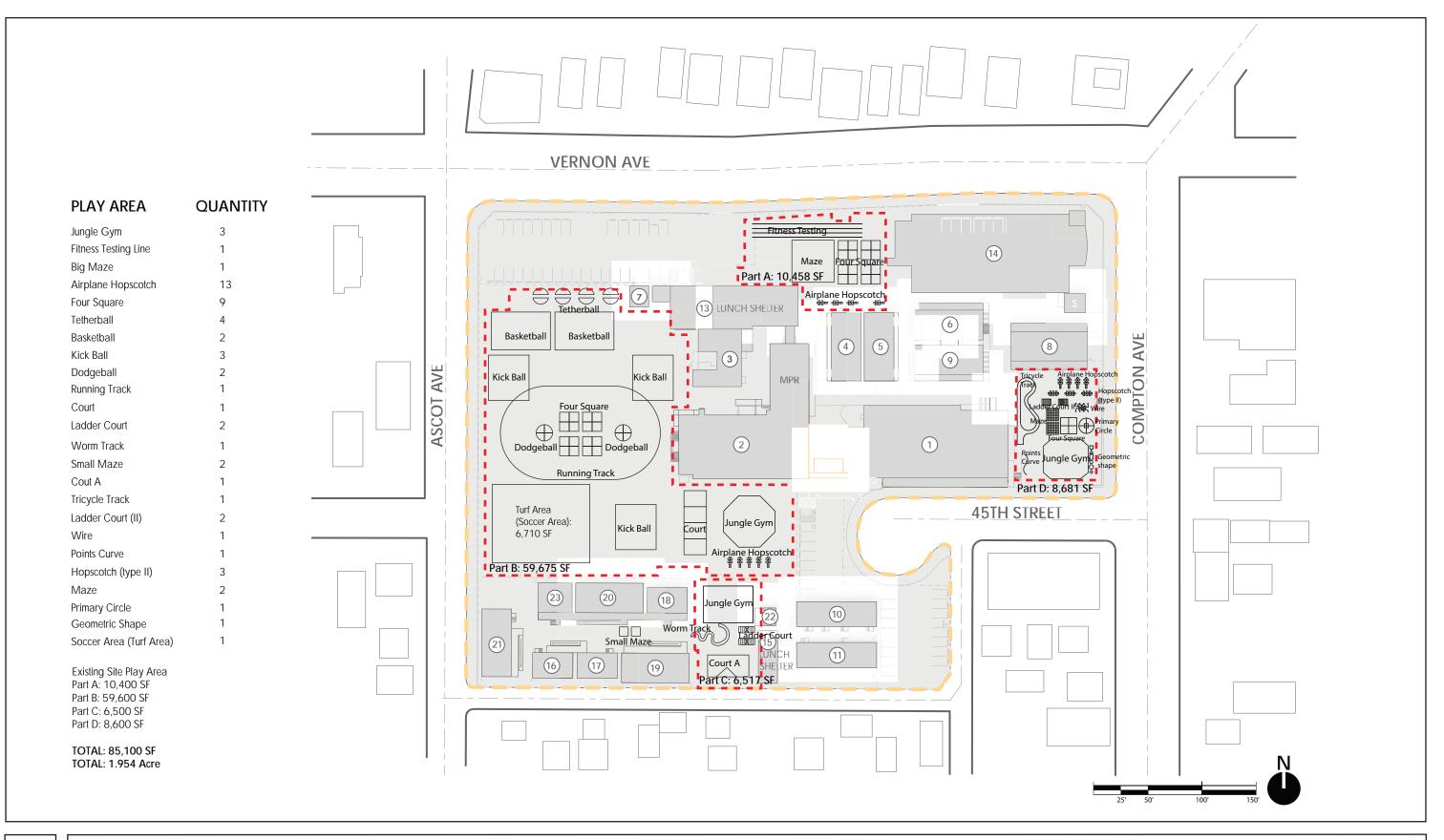




FIGURE 6 Existing P.E./Playground Areas

2. Environmental Setting



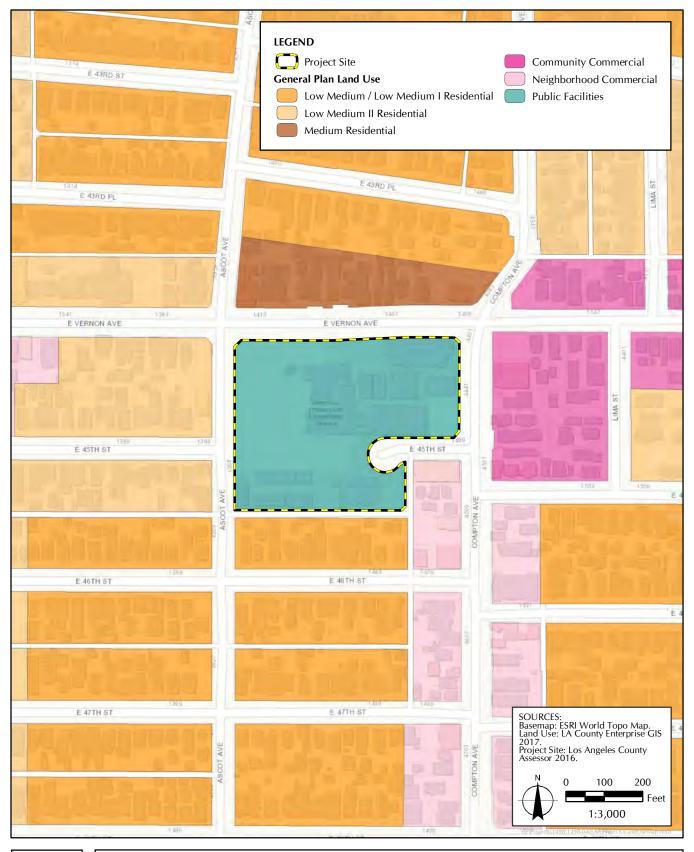


FIGURE 7



General Plan Land Use Map

2. Environmental Setting



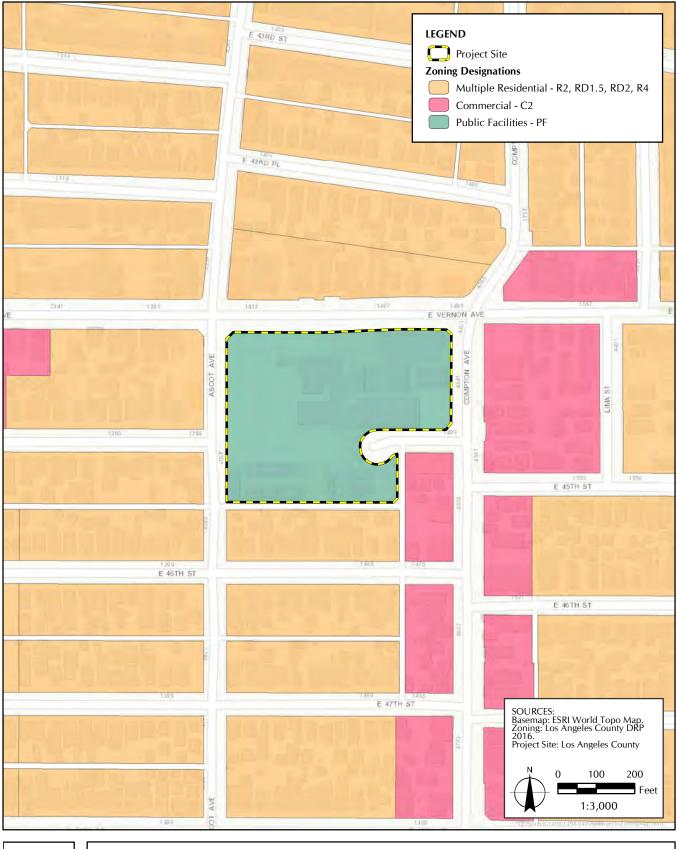




FIGURE 8 Zoning Map

2. Environmental Setting



3.1 BACKGROUND

Purpose and Need for the Project. The proposed Project has been developed under the LAUSD's SUP to improve student health, safety and education through the modernization of school facilities. Ascot ES was identified as one of 22 schools in the District most in need of an upgrade due to the physical condition of the facilities. Based on an assessment of the following conditions, the 22 proposed school sites were identified as having a multitude of critical physical conditions that may pose a health and safety risk or negatively impact a school's ability to deliver the instructional program and/or operate:³⁴

- The physical condition of a school's buildings and grounds/outdoor areas identified by the 10-year Facilities Condition Index (FCI), a comparative indicator of the relative condition of a school's facilities in relation to the current replacement value. Where applicable, the FCI score is adjusted to reflect projects under way and the improved conditions that will be provided.
- The seismic risk factor identified using the Federal Emergency Management Agency's (FEMA's) Hazus-MH model for determining the probability of failure based on the predicted earthquake magnitude generated by specific faults, year of construction, type of construction, number of stories, and code and construction quality at the time of construction.
- Size of food service facility, multi-purpose room/auditorium, and library determined by an assessment of the difference between the size of the core facility and the design standard for a new facility.
- Size of play space determined by an assessment of the difference between the size of a school's play area and the size recommended under the Rodriguez Consent Decree.
- Percentage of classrooms in portable buildings calculated based on the number of classrooms in portable buildings versus the number of classrooms in permanent buildings.
- Adequacy of controlled public access point based on an assessment of whether a campus has a secured single point of entry, an intercom/camera system that controls visitor access to the school site, or neither.
- Site density determined by an analysis of the amount of square footage per student at a school site.

Goals. Projects developed under LAUSD's 2015 SUP, which includes Comprehensive Modernization Projects, are intended to provide facilities that improve student health, safety, and educational quality. More specifically, the BOE approved SUP goals and principles are as follows:

³⁴ LAUSD. December 13, 2016. Board Report No. 205-16/17.

- Schools Should Be Physically Safe and Secure
- School Building Systems Should Be Sound and Efficient
- School Facilities Should Align with Instructional Requirements and Vision

Furthermore, six core objectives/principles have been established for scoping of Comprehensive Modernization Projects undertaken under the SUP:³⁵

1. The buildings identified to be seismically vulnerable must be addressed.

The buildings will be retrofitted, modernized, and/or demolished and replaced depending on the level of effort required to address the seismic vulnerabilities, the historic context of the building/site, and the approach that best ensures compliance with DSA requirements.

2. The buildings, grounds, and site infrastructure that have significant/severe physical conditions that already do, or are highly likely in the near future to pose a health and safety risk, or negatively impact a school's ability to deliver the instructional program and/or operate should be addressed.

The broken or failing systems, infrastructure, and/or components in these buildings will be repaired and/or replaced. The comprehensive modernization project will not significantly modernize and update the building as a whole, nor the project demolish and replace with a new building with a few exceptions. The exceptions to this principle are ancillary building such as, but not limited to, lunch shelters, storage units, M&O buildings, and outdated and inaccessible federal buildings.

- 3. The District school's reliance on relocatable buildings, especially for K–12 instruction, should be significantly reduced.
- 4. Necessary and prioritized upgrades must be made throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the Modified Consent Decree (MCD).
- 5. The exterior conditions of the school site will be addressed to improve the visual appearance including landscape, hardscape, and painting.
- 6. The interior of classrooms and adjacent interior corridors that would otherwise not be addressed will be improved. Improvements may include new interior paint, improvements to flooring systems, and upgraded permanent classroom fixtures such as window treatment/blinds and whiteboards.

As these goals and objectives are applied to the Ascot ES campus and community, the following Project-specific objectives have been developed:

- 1. Ensure that the buildings that have been identified as requiring seismic upgrades are addressed.
- 2. Improve the overall functionality and utility of the campus.
- 3. Provide a primary point of entry to the site that is secure and welcoming to students, staff, community members, and visitors.



³⁵ Ibid.

- 4. Address compliance with Executive Order 12898: address Environmental Justice in minority populations and low-income populations.
- 5. Reduce the reliance on portable classrooms.
- 6. Maximize the use of limited bond funds to provide modern, permanent classroom facilities.
- 7. Reconstruct and modernize Ascot ES to provide an educational facility for students in the 21st century and beyond.
- 8. Replace buildings and infrastructure that have reached the end of their useful lives.
- 9. Reduce amount of stormwater runoff drainage and improve quality of runoff by increasing pervious surfaces on campus.
- 10. Improve campus access and circulation especially for emergency vehicles and personnel.
- 11. Provide upgrades throughout the school site in order to comply with the program accessibility requirements of the ADA Title II Regulations, and the provisions of the MCD, consistent with the District Self-Evaluation and Transition Plan Under the Americans with Disabilities Act.³⁶
- 12. Decrease campus energy use by upgrading or replacing facilities and incorporating standards developed by the CHPS.

3.2 PROPOSED PROJECT

The proposed Project would substantially modernize most of the 5.3-acre Ascot ES campus. The proposed Project would not increase the current capacity of the Ascot ES campus. The Project would be completed under LAUSD's SUP. As such, the goals of the Project are consistent with the SUP's goal to build, modernize, and repair school facilities to improve student health, safety, and educational quality (per the SUP Program EIR certified by the Board on November 10, 2015).

When completed, the proposed Project would provide the capacity for 850 students in 47 classrooms, which is a reduction of 8 classrooms from the current count of 55 classrooms. The proposed Project provides for the removal of permanent and portable buildings along with hardscape, landscape, and parking areas, and construction of new facilities at Ascot ES. Specifically, the proposed Project would include the changes to the Campus buildings shown in Table 3, *Proposed Project (Demolition, Remodel, and Construction)*. With implementation of the proposed Project, there would be a slight reduction in teaching stations (47) and approximately 3,937 additional square feet of buildings on campus.

³⁶ LAUSD, with the guidance of Irene Bowen, ADA One, LLG and Evan Terry Associates, LLC. Ocotber 10, 2017. Self-Evaluation and Transition Plan Under the Americans with Disabilities Act. Available at: https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/821/AAA%20Self-Evaluation%20and%20Transition%20Plan%20Under%20the%20ADA%20APPROVED%20101017.pdf

Bldg. No.	Building	Demolition	Remodel / Modernization ¹	New Construction	Existing to Remain ¹
1	Administrative / Classroom Building	20,561			
2	Auditorium & Classroom Building	16,890			
3	Cafeteria Building	2,159			
4	Two/Three Unit Relocatable Building	1,776			
5	Two/Three Unit Relocatable Building	1,776	4,041		
6	Sanitary & Classroom Building				4,041
7	Storage Unit	360	1,999		
8	Kindergarten Building				1,999
9	Classroom Building		3,604		3,604
10	Two/Three Unit Relocatable Building	1,807			
11	Two/Three Unit Relocatable Building	1,807			
13	Lunch Shelter	1,775			
14	3-Story Parking & Classroom Building		36,251		36,251
15	Lunch Shelter (Former M0491K)	768			
16	Single Unit Relocatable	912			
17	Single Unit Relocatable	912			
18	Sanitary Relocatable Building	912			
19	Two/Three Unit Relocatable	1,792			
20	Two/Three Unit Relocatable	1,792			
21	Two/Three Unit Relocatable	1,112			
22	Food Services Relocatable Building	176			
23	Single Unit Relocatable	887			
	Academic Areas			36,179	
	Shared Educational Areas			618	
	Shared Support Areas			22,164	
	Administration			3,817	
	Maintenance & Operations			994	
	Campus Total* (does not include outdoor space)	59,836	45,895	63,773	45,895

TABLE 3 PROPOSED PROJECT (DEMOLITION, REMODEL, AND CONSTRUCTION)



Bldg. No.	Building	Demolition	Remodel / Modernization ¹	New Construction	Existing to Remain ¹
NOTE:					
All num	planning and desig	l new square footages are approx gn phases. These square footage s in this Initial Study.			
Current		isting + Remodel + Demolition (10 109,668 square feet). Increase in (
¹ Limite	d Scope Modernization to barrier removal.	include: interior and exterior pain	t and finish upgrades	, limited IP converg	ence, and limited
* Squar		dd up exactly due to rounding and Avenue Elementary School Comp			

Demolition and Removal

The modernization of existing permanent buildings identified in District studies as requiring significant seismic upgrades was determined to be cost prohibitive as it would result in upgrades to numerous other systems and affect long-term use of the buildings. These buildings would be demolished and replaced by new facilities. In addition, existing portable buildings would be removed as part of the District's goal of eliminating portable classroom facilities on campus.

As shown in Table 3, three permanent buildings, including the two-story administrative/classroom building, two-story auditorium/classroom building, and one-story cafeteria building would be demolished. In addition, 12 portable classroom buildings, and two lunch shelters would be removed and/or demolished. Total building demolition is estimated at approximately 59,836 square feet.

New Construction and Campus Upgrades

The proposed Project would include the construction of the following new permanent structures to replace those that would be demolished or removed. A total of 10 kindergarten classrooms, six general classrooms, six special education classrooms, and two flexible classrooms would be included in the new construction. Development zones for new buildings include the following functions/program uses (Figure 9, *Proposed Site Organization Diagram*):

- 24 new classrooms in one and two story classroom buildings to include:
 - o 10 E-TK, TK, and Kindergarten classrooms
 - o 6 Special Education Classrooms
 - o 2 Specialty Classrooms
 - o 5 General Classrooms
 - o 1 Parent Room

- Administration/Classroom/Library Zone with the following components:
 - o Administration
 - o Kindergarten classrooms
 - o General classrooms
 - o Special education classrooms
 - o Flexible classrooms
 - o Library
- Classroom Zone
 - o General classrooms
 - o Support spaces
- Administration/Multi-Purpose/Food Service/Maintenance & Operations Zone
 - o New MPR
 - o New Food Service Facility
 - o New Lunch Shelter
 - o New M&O Facility and yard
 - o New hardscapes
 - New landscape and turf areas
 - o New parking areas
 - o New site wide infrastructure upgrades

The Campus would receive the following site upgrades:

- Major site-wide infrastructure, including domestic water; irrigation; gas; sewer; fire, telephone, and data systems; electrical; storm drainage.
- Relocation and Restriping of the faculty parking lot to match or exceed the existing stalls.
- Playground Areas, including a separate Kindergarten playground area, play structures, etc.
- Site-wide programmatic access upgrades to comply with the ADA.
- Major site-wide revamp of the Campus landscaping and hardscaping. Existing trees removed by the Project would be reused to the extent feasible or replaced by an appropriate size and species selected from the LAUSD Approved Plant List.³⁷
- New Fencing and Gates (Figure 10, Proposed Fence Diagram)

http://www.laschools.org/documents/download/sustainability%2Fwater_conservation%2FCopy_of_Updated_Plant_List_2012.pdf



³⁷ LAUSD. 2012. LAUSD Approved Plants List. Available at:

- Infrastructure Upgrades
- Application of fresh paint to the exterior of the remaining Ascot ES buildings

The proposed Project provides a well-planned, revitalized campus with high-performing educational environments and outdoor areas that foster student achievement and well-being.

The design intent of the Project is to revitalize the Ascot ES campus and to bolster its presence in the neighborhood through new architecture, landscape, graphics, and signage. The Project would provide 21st-century learning environments to support specialized programs that distinguish Ascot ES as a school offering unique learning opportunities. Given the temperate climate, the proposed Project would provide shared opportunities, where learning can occur indoors and out, that accommodate instruction, events, and campus gatherings. The proposed Project would provide needed space for student achievement through creation of a cohesive and inviting center for students and the local community to gather and learn.

The proposed Project design would continue to provide space that supports Ascot ES' current meal programs including "Breakfast in the Classroom," "National Lunch Program," "Breakfast and Lunch for Primary Center," and the "Child and Adult Care Food Program (Supper Program)" that provide hundreds of meals a day to Ascot ES students, families, and neighbors.

The new Ascot ES campus would contain design features to be safe and secure. The school entrance adjacent to the new administrative offices would clearly define a point of entry and provide access control for public events. The campus would continue to provide full perimeter fencing or wall enclosure for the entire school campus, with improvements made to shield playgrounds from views from public streets as much as possible (see Figure 10). Exterior lighting would be provided per LAUSD School Design Guidelines and applicable Code to enhance site security, including area lighting, walkway lights, and building perimeter illumination. Adequate night lighting would be provided throughout the site, especially to and from parking areas. Remote or automatic operation would be installed with an automatic overhead coiling shutter at Building 14 parking to facilitate vehicular access and parking security. Safety and security features including an intrusion instruction system, close circuit television surveillance system, public address system, and new emergency assemble area would be provided on-site consistent with LAUSD School Design Guidelines.

Preliminary Environmental Assessment Equivalent (PEA-E)

A Preliminary Environmental Assessment Equivalent (PEA-E) was conducted at the site in 2018 and 2019 by Wayne Perry, Inc. (Appendix B, *Preliminary Environmental Assessment Equivalent*). Field sampling and analysis was conducted to determine whether historical uses have resulted in hazardous substances at the Project site as part of the PEA-E. In addition, the soil investigation was conducted to determine if the restriction of South Coast Air Quality Management District (SCAQMD) Rule 1466 *Control of Particulate Emissions from Soils with Toxic Air Contaminants.* The results of the laboratory analysis showed levels of lead concentration were above residential screening thresholds. The PEA-E describes the contamination, excavation dimensions, methodology, transportation and disposal, confirmation sampling plan, methods to ensure worker and public health safety, and cleanup goals. The contaminated soils would be removed prior to construction of each phase with methods intended to reduce dust emissions. In addition, the contaminated soil would be removed when no students or staff are present to satisfy Rule 1466. All cleanup activities under the PEA-E would adhere to applicable state

and local policies and regulations regarding excavation, removal, and disposal of affected materials. The volume of impacted soil that is addressed by the soil removal action is estimated to be less than 2,000 cubic yards (cy).

3.2.1 Site Access, Circulation, and Parking

As part of the proposed Project, the main entrance to Ascot ES would be reoriented from the 45th Street culde-sac to Ascot Avenue. It is anticipated that student entrance(s) on Ascot Avenue and at the 45th Street culde-sac would provide before and after school drop-off and pick-up points. During school hours, controlled entry will occur on Ascot Avenue with check-in at the new Administration Office.

- Site Drop Off: Vehicles dropping off and picking up students would approach the campus from the South along Ascot Avenue so that students can exit vehicles from the passenger side of the car. No curb cutout is anticipated. The drop off/pickup area would be designated with City of Los Angeles Traffic street signs and painted curbs.
- **Parking:** Vehicular access in and out of the staff/visitor parking would be along the south side of Ascot Avenue and consolidated along a linear parking lot to the South of the property, creating a buffer between the alley and the campus. District vehicular and service access may also be accessible via the cul-de-sac at 45th Street. The proposed Project would provide 83 to 106 parking spaces; however, 106 spaces are required per School Design Guidelines and are targeted. The Project would provide visitor parking at the west end of the parking zone (near Ascot Avenue). Visitor parking would not be within staff parking fence line.
- **Special Education Drop off:** Small buses (25 feet long x 8 feet wide) currently drop-off and pick-up Special Education students at the east side of campus along Compton Avenue. It is anticipated that this procedure would continue. A new accessible path/ramp would be provided from the playground to the street level on 45th Street.

3.2.2 Landscaping

The proposed Project would involve removal and replacement of existing landscaping on-site to provide a new Outdoor Assembly Area with a raised platform or stage to serve as a gathering area for outdoor program and instructional presentations, graduation exercises, and informal gatherings; a balanced variety of landscaped spaces for active play and shaded quiet play incorporating turf and shade canopies; waterproof emergency supply containers; and miscellaneous storage bins, as required by the LAUSD School Design Guidelines. The landscape design would support the learning experience by creating opportunities for development of active and passive recreation and instructional spaces. CHPS criteria would be implemented where appropriate. Clear and accessible paths of travel and accessible routes throughout the campus would be provided. Concrete paving and/or concrete pavers would be provided for pedestrian circulation areas. Asphalt paving using a Cool Coatings paint system per District Standards would be installed at play courts. Play equipment would be removed and replaced with a one-to-one ratio of play value or greater than existing conditions. Site lighting would be integrated into the landscape design to provide safety and visibility on campus and consist of wall



mounted building lights, light posts, and pathway lighting. Additional exterior campus lighting would comply with LAUSD standards of acceptable site lighting.

The irrigation would be installed compliant with LAUSD School Design Guidelines and Standards and CALGreen and CHPS WE 3.0, WE 3.1, and WE 4.1 requirements, with a dedicated meter, new pressure reducing backflow, master valve, flow sensor, and smart controller to increase irrigation efficiency.³⁸ Design case total water allowance (TWA) utilizing more drought-tolerant planting, expanded microspray areas, and more efficient irrigation nozzles would indicate the gallons of water used to ensure that the total water use allowance would be consistent with CHPS criteria WE 3.1 and WE 4.1. Plant material would comply with the LAUSD approved plant list and be grouped according to hydrozones. No protected trees would be removed. Up to 44 existing trees would be removed and replaced consistent with the City of Los Angeles Protected Tree Ordinance (Figure 11, *Existing Trees Map*).³⁹ The existing trees deemed appropriate to save shall be protected in place throughout construction, with attempts made to preserve as many existing trees as possible. New canopy and accent trees would be installed to increase canopy coverage and provide shade and interest throughout the campus. Proposed trees would be amended accordingly per agronomist soils report in order to improve the soil quality, and water holding capacity. The planting areas would be covered with bark mulch to a 3-inch minimum depth.

3.2.3 Construction Phasing and Equipment

Construction is planned to start in the second quarter (Q2) of 2021 and be completed by Q1-2025 (approximately 42 months). While the phasing of the work has not yet been determined, this analysis assumes that there will be two 18-month phases. The actual duration of construction would likely be longer; however, by assuming the shortest expected construction duration, this study is taking a more conservative approach with regard to the air quality analysis. Due to active school operation during the construction phase, less than 50 percent of the school site (contiguous) would be disturbed at any one time. An average of 50 workers would be onsite when students are present and a maximum of 150 workers would be onsite during peak periods (i.e., during summer break).⁴⁰

To the extent feasible, construction related activities would be scheduled to occur during daylight hours. Construction-related traffic and deliveries would be scheduled to avoid student pick-up, drop-off hours, and during noise sensitive times as coordinated with the school administration. Consistent with the City of Los Angeles Municipal Code, all non-emergency construction activities would occur between 7:00 a.m. and

³⁸ State of California. Adopted 2009 / updated 2015. Model Water Efficient Landscape Ordinance. 2009 ordinance available at: https://water.ca.gov/LegacyFiles/wateruseefficiency/docs/MWELO09-10-09.pdf 2015; update available at: https://water.ca.gov/LegacyFiles/wateruseefficiency/landscapeordinance/docs/2015%20MWELO%20Guidance%20for%20Lo cal%20Agencies.pdf

³⁹ City of Los Angeles. 1982. Ordinance No. 177404. Available at:

https://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf

⁴⁰ Worker trips based on California Emissions Estimator Model (CalEEMod), version 2016.3.1.

9:00 p.m., Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturdays and national holidays.⁴¹ Construction would be prohibited on Sundays.⁴²

Demolition activities would be monitored by the District's Facilities Environmental Technical Unit (FETU) in accordance with the District's standard practices. FETU would be responsible for ensuring the safe removal of potential asbestos-containing materials, lead, and PCBs that may be encountered during construction. LAUSD would ensure that all construction related activities are completed in accordance with applicable federal, state, and local regulations, including but not limited to the EPA Guidance on Conducting Non-Time-Critical Removal Actions Under Comprehensive Environmental Response, Compensation, and Liability Act, National Oil and Hazardous Substances Pollution Contingency Plan, and all applicable LAUSD specifications, and standards. Construction would also comply with the applicable SCs, which include, but are not limited to, SC-USS-1, which requires that any construction waste will be recycled to the maximum extent feasible.⁴³

Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Site preparation and construction of the proposed Project would be in accordance with all federal, state, and local regulations including the California Green Building Code and work hours established in the City of Los Angeles Municipal Code (LAMC). Each phase of construction would require 75 to 100 construction workers, in one shift per day. Construction workers would park on nearby city streets.

This analysis assumes that 10 to 15 delivery and construction trucks (15–20 tons each) would be required on an as-needed basis for earthwork to import and export soils and remove debris. Approximately 15,000 to 18,000 cubic yards of import/export would be hauled. Equipment utilized during construction activities would include earthwork equipment (excavators, backhoes, loaders, compactors, etc.), concrete trucks, mobile all-terrain cranes, and forklifts.

Table 4, Anticipated Construction Equipment, shows the types and amounts of construction equipment that are anticipated to be used for implementation of the Project. Figure 12, Proposed Demolition Site Plan, shows the demolition areas.

Phase 1 & 2	Schedule	Equipment	Maximum Number/Day
Demolition/Interim	3 months	Excavators w/breaker	1
Housing/Modernization (i.e., Building Interiors)		Loader	1
(i.e., building menors)	(3)	Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips; average 10 CY end-dump trucks	10

 TABLE 4

 ANTICIPATED CONSTRUCTION EQUIPMENT

⁴³ LAUSD. 2015. School Upgrade Program Environmental Impact Report. Available at: http://achieve.lausd.net/ceqa

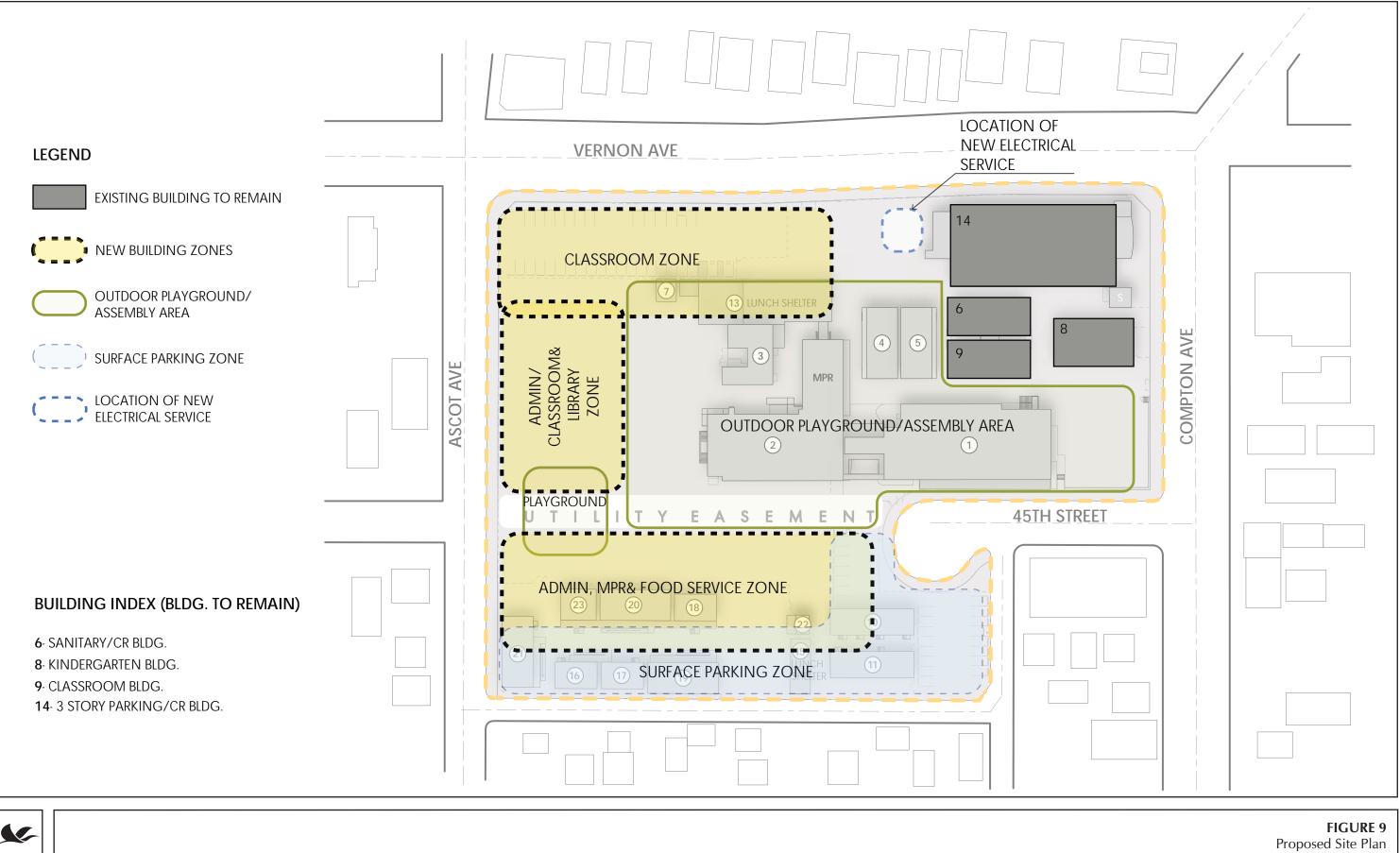


⁴¹ City of Los Angeles Municipal Code § 41.40(b).

⁴² Ibid.

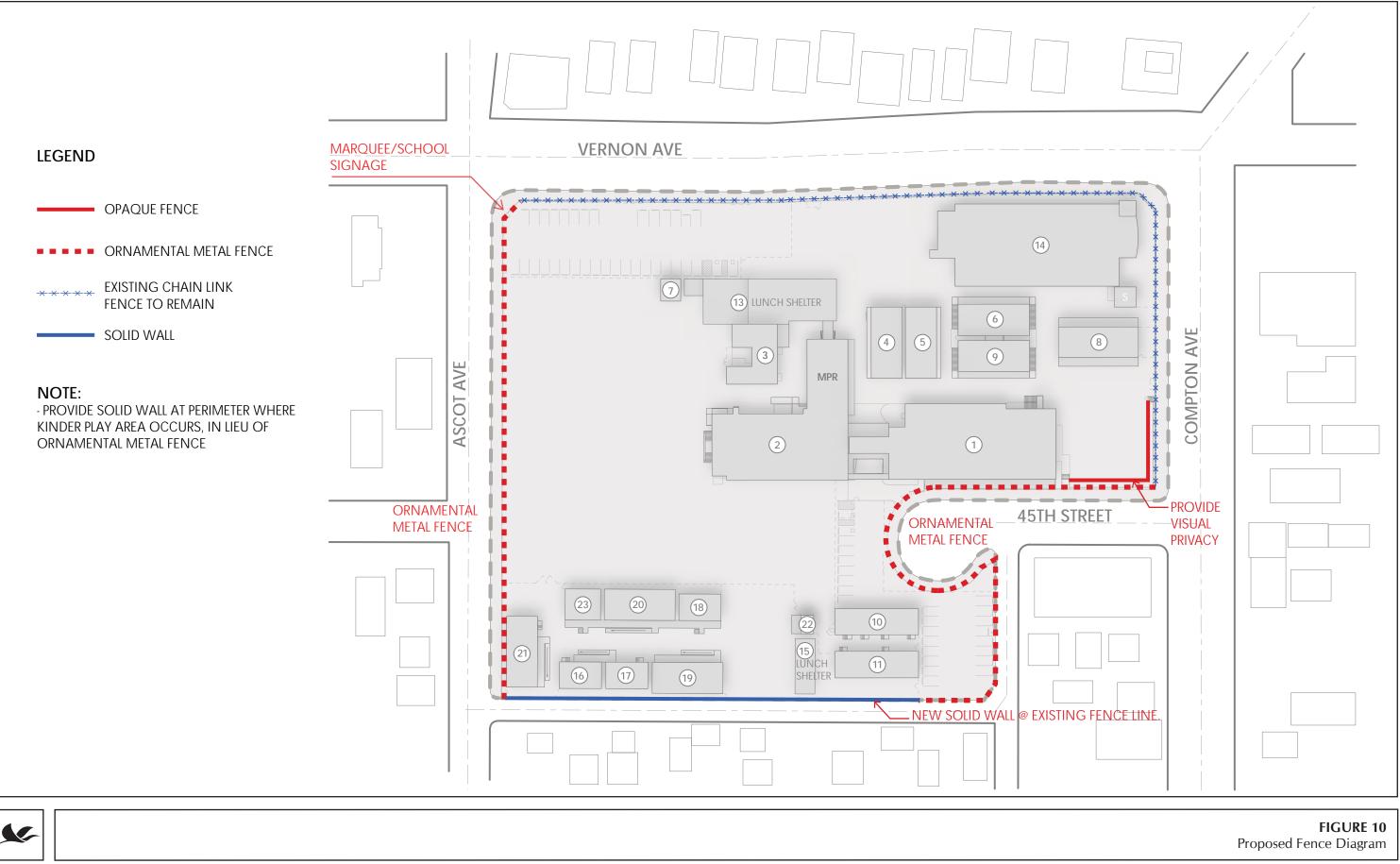
Phase 1 & 2	Schedule	Equipment	Maximum Number/Day
		Asphalt/Concrete Debris haul trips; average 10 CY end-dump trucks	10
		Jack Hammers/Air Compressor	2
Site Prep/Modernization	3 months	Excavator	1
		Compactor	1
		Loader	1
		Skip Loader	1
		Water Truck	1
		Soil haul trips (soil export); average 14 CY bottom dump trucks	35
		Vibratory Rollers (for 95% soil compaction)	2
		Trencher / Excavator	1
Building Construction/	12 months	Concrete Trucks	5
Modernization		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
		Dump Trucks	2
		Fork Lifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Air Compressor	1
Asphalt Paving and Off-	3 months	Skip Loaders	2
Site Street Work		Roller	1
		Paver	1
		Asphalt Trucks	8
		Water Truck	1



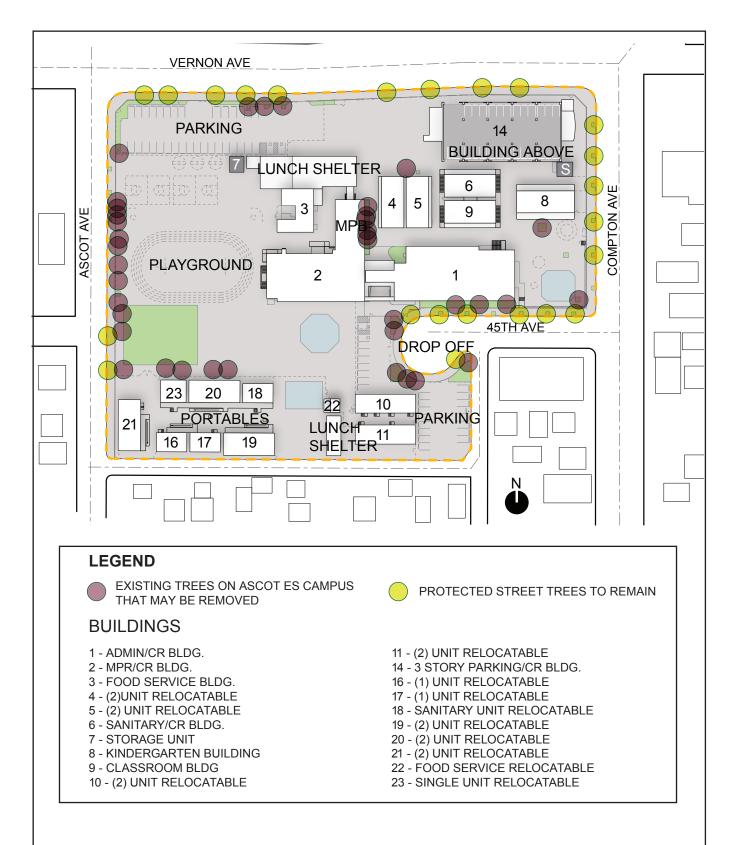










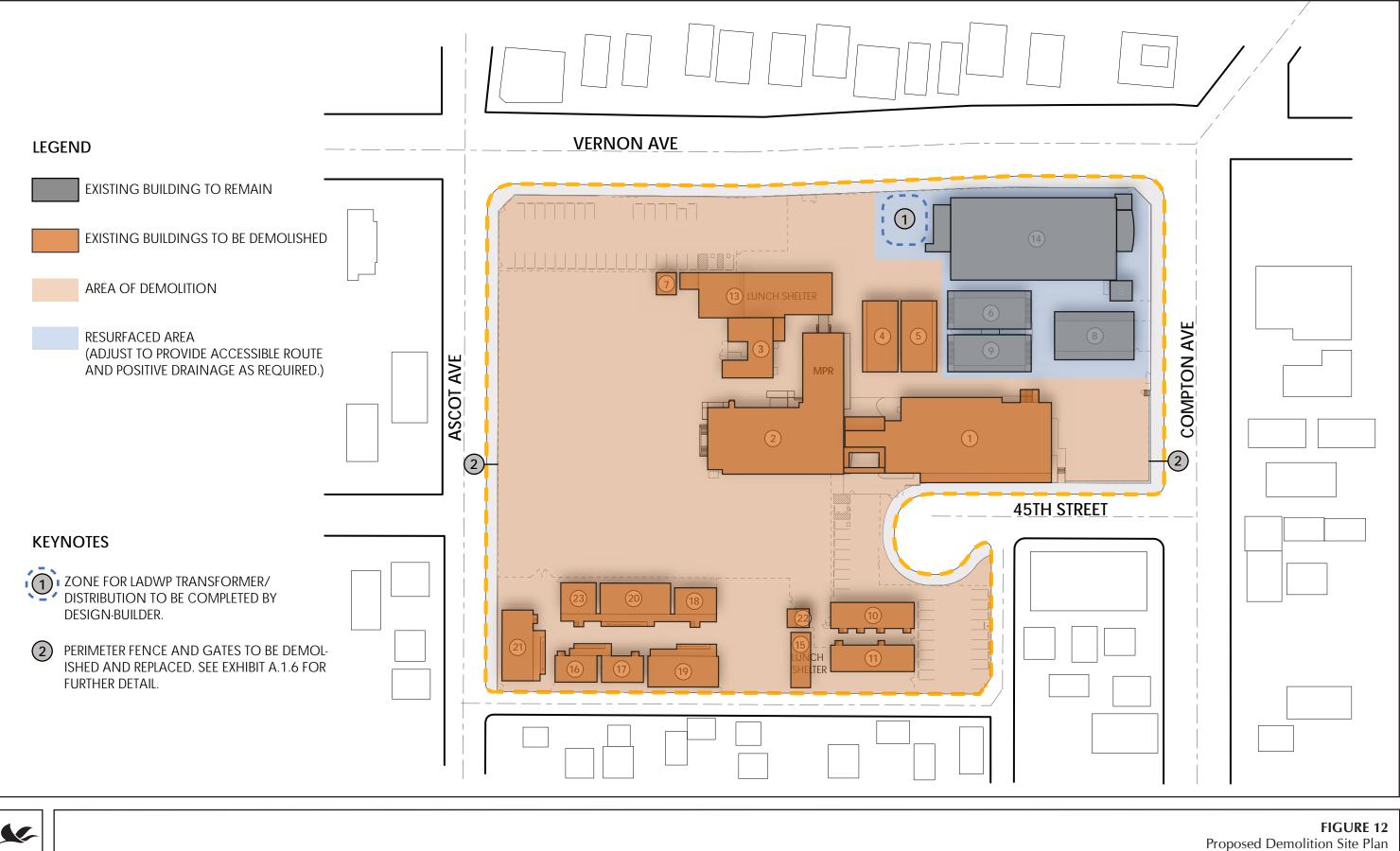


SOURCES: (1) AC Martin Partners. July 9, 2018. Ascot Elementary Site Analysis Report - 10368157. Page 1-12, Summary of Facilities Conditions; (2) Carlberg Associates. January 23, 2018. Arborist Report.



FIGURE 11 Existing Trees Map







4. Environmental Checklist and Analysis

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

Aesthetics		Hazards & Hazardous Materials		Recreation
Agriculture & Forestry Resources		Hydrology & Water Quality		Transportation & Traffic
Air Quality		Land Use & Planning		Tribal Cultural Resources
Biological Resources		Mineral Resources		Utilities & Service Systems
Cultural Resources		Noise		Wildfire
Energy		Pedestrian Safety		Mandatory Findings of
Geology & Soils		Population & Housing		Significance
Greenhouse Gas Emissions		Public Services		
	_		\boxtimes	None with Mitigation
		None		Incorporated

DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed Project could not have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
I find the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
□ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Signature

<u>Carlos A. Torres</u> Printed Name

3/25/2019

Date

<u>CEQA Officer for LAUSD</u> Title



EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5. Earlier analyses may be used where, pursuant to the tiering, Program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9. The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance.



ENVIRONMENTAL IMPACTS Less Than Potentially Less Than Significant Significant with Mitigation Significant No Impact Incorporated Impact Impact I. AESTHETICS. Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), would the project: a. Have a substantial adverse effect on a scenic vista? \bowtie \boxtimes b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? \boxtimes \square c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? \boxtimes \square \square \square d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Explanation:

A Historic Resources Evaluation Report (HRER; Appendix A) prepared for the Project site, a review of the Caltrans Scenic Highway system, a site visit, and a review of the City of Los Angeles General Plan and Southeast Los Angeles Community Plan serve as the basis for the aesthetics analysis. LAUSD has six SCs for minimizing impacts to aesthetic resources. Applicable SCs related to aesthetic resource impacts associated with the proposed Project are provided below. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to aesthetics.

LAUSD	Standard Conditions of Approval
SC-AE-2:	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. School Design Guide
	This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.
SC-AE-3:	LAUSD shall assess a proposed Project's consistency with the general character of the surrounding neighborhood, including any proposed changes to the density, height, bulk, and setback of a new building (including stadium), addition, or renovation. Where feasible, LAUSD shall make appropriate design changes to reduce or eliminate viewshed obstruction and degradation of neighborhood character. Such design changes could include, but are not limited to, changes to campus layout, height of buildings, landscaping, and/or the architectural style of buildings.
SC-AE-4:	LAUSD shall review all designs to ensure that the installation of a school marquee complies with Marquee Signs Bulletin BUL 5004.1.
	Marquee Signs Bulletin BUL-5004.1

	This policy provides guidance for the procurement and installation of marquee signs (outdoor sign with electronic message display) on District campuses. The policy includes requirements for the design, approval, placement, operation, and maintenance of electronic school marquees erected and operated at schools. The policy also includes measures to mitigate light and glare, such as the use of "luminaries" in connection with school construction.						
SC-AE-5:	LAUSD shall review all designs and test new lights following installation to ensure that adverse light and glare impacts and spillage are avoided.						
	School Design Guide						
	This document outlines Illumination Criteria, requirements for outdoor lighting and measures to minimize and eliminate glare that may impact pedestrians, drivers and sports teams, and to avoid light spilling onto adjacent properties.						
SC-AE-6:	International Dark-Sky Association (IDA) and the Illuminating Engineering Society (IES) Model Lighting Ordinance (MLO) shall be used a guide for environmentally responsible outdoor lighting. The MLO outdoor lighting has outdoor lighting standards that reduce glare, light trespass, and skyglow. The Joint IDA-IESNA Model Outdoor Lighting Ordinance (MLO) uses lighting zones (LZO4) which allow the District to vary the stringency of lighting restrictions according to the sensitivity of the area as well as consideration for the community. The MLO also incorporates the Backlight-Uplight-Glare (BUG) rating system for luminaires, which provides more effective control of unwanted light. IDA-IESNA Model establishes standards to:						
	Limit the amount of light that can be used						
	 Minimize glare by controlling the amount of light that tends to create glare 						
	 Minimize sky glow by controlling the amount of uplight 						
	 Minimize the amount of off-site impacts or light trespass 						
SC-AE-2:	LAUSD shall review all designs to ensure that methods from the current School Design Guide are incorporated throughout the planning, design, construction, and operation of the Project in order to limit aesthetic impacts. School Design Guide						
	This document outlines measures to reduce aesthetic impacts around schools, such as shrubs and ground treatments that deter taggers, vandal-resistant and graffiti-resistant materials, painting, etc.						

a) Have a substantial adverse effect on a scenic vista?

No Impact. There would be no impact to aesthetics in relation to scenic vistas because the City of Los Angeles has not designated any scenic vistas in the City of Los Angeles, although Section 15 of the Conservation Element has identified three scenic features within the City of Los Angeles as valuable resources to be protected: views of the ocean, striking or unusual natural terrain, and unique urban or historic features.⁴⁴ As the Project site is located in an urbanized area approximately 11.9 miles northeast of the Pacific Ocean, the proposed Project would have no effect on views of the ocean. As stated in the HRER for the Project site, the existing buildings on the Project site are not considered a historical resource for the purposes of CEQA. The Project site and surrounding area are relatively flat and developed with urban land uses. The proposed Project would not affect the skyline of downtown Los Angeles, which is located over 2 miles north of the Project site, or vistas of the San Gabriel Mountains, which are located over 15 miles north of the Project site. Unique urban features in the SELA Community Plan Area (CPA) include Watts Towers (located approximately 4.4 miles south of the Project site), the historic Central Avenue Jazz Corridor (located approximately 0.4 mile [two residential blocks] west of the Project site), and Mercado La Paloma (located approximately 1.9 miles northeast of the Project site).⁴⁵ Due to the relatively flat topography and urbanized character of the Project area with street trees and relatively shallow building setbacks, views are limited in the area. Additionally, Project development would not obscure these views. The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as LAUSD is required to incorporate the LAUSD School

⁴⁵ Los Angeles Department of City Planning. November 2017. Southeast Los Angeles Community Plan. Available at: http://cityplanning.lacity.org/complan/pdf/selcptxt.pdf



⁴⁴ City of Los Angeles Department of City Planning. September 2001. City of Los Angeles Conservation Element. Section 15: Land Form and Scenic Vistas. Available at: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf

Design Guide into the site design and construction for protection of unique scenic features and designated scenic vistas (SC-AES-1). No impact to scenic vistas would occur. No mitigation or further study is required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There would be no impact to aesthetics in relation to state scenic highways because there are no officially designated or eligible state scenic highways on or adjacent to the proposed Project site; nor is the Project site visible from any existing or proposed scenic highway. The California Scenic Highway Program preserves and protects scenic highway corridors from changes that would diminish their aesthetic value. Caltrans designates scenic highway corridors and establishes those highways that are eligible for the program. The program was created in 1963 with the enactment of the State Scenic Highways Law. The street and highway code includes a list of those highways that are either eligible for designation or are designated.⁴⁶ The nearest officially designated state scenic highway to the site is State Route 2 (SR-2; Angeles Crest Highway) about 15.8 miles to the northeast of the Project site. The nearest designated historic parkway is SR-110, about 5.6 miles northeast of the Project site (Figure 13, *Scenic Highways*). The proposed Project would not be visible from any designated state scenic highway due to distance and intervening urban development, ornamental street trees, and topography. Project development would not result in impacts to scenic resources within a designated state scenic highway. No impact to scenic resources would occur. No mitigation or further study is required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The proposed Project would result in less than significant impacts to visual character or quality of public views because, other than the temporary change in visual character during construction, the proposed Project is located within an urbanized area and would be consistent with the Project site's PF zoning designation and other regulations governing scenic quality. The Project site is an existing elementary school and would remain an elementary school campus as a result of the Project. From public viewpoints, the Project site is characterized by one- to three-story beige buildings and structures, expansive asphalt surfacing painted white with parking striping and for recreational use, an approximately 10-foot-high chain link fence surrounding the campus, four visible murals, and perimeter ornamental shrubs and trees (Figure 14, *Project Area Photographs*). Building 14 (three-story Parking & Classroom Building) is the most visually prominent building located on the Ascot ES, with a height of three stories, four colorful façade accents along E Vernon Avenue and Compton Avenue. The other existing buildings on campus have been painted with neutral beige tones.

The Program EIR states that impacts to scenic vistas with respect to all SUP projects would be less than significant, as the District is required to incorporate measures from the LAUSD School Design Guide (SC-AE-

⁴⁶ California Department of Transportation. August 2, 2018. Scenic Highways. Available at: http://www.dot.ca.gov/design/lap/livability/scenic-highways/

2) and SC-AE-3 into site-specific project design for the protection of character and quality of site surroundings. 47,48

Shadow-sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (e.g., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project vicinity include the residential uses located approximately 18.2 feet south of the Project site boundary and across the street from the Project site to the north, east, and west. Due to the path of the sun from the east to the south/overhead to the west, structures located north of a shadow-sensitive use would not typically cast shadows on the use. Impacts from shadows would be virtually the same as current conditions, as the new classrooms would be one story in height and would not cause shadows to extend off-site in such a manner as to significantly impact nearby sensitive residential uses. Similarly, due to its proposed location, the new Classrooms and Administration Building would not have shadows casting onto residential uses located at least 80 feet to the north or west of the Project site, across Vernon Avenue and Compton Avenue; or at least 60 feet to the west, across Ascot Avenue. There would be no new shade impacts to sensitive uses on the northern side of the site. No significant impacts from shadows would occur as a result of the Project.

With implementation of SC-AE-3, impacts to the visual character or quality of the site and its surroundings would be less than significant. No mitigation or further study is required.

d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The proposed Project would result in less than significant impacts to aesthetics in relation to light and glare, as lighting of the Project and glare from the building materials would be comparable to the existing condition. The Project site is located in the Los Angeles basin, which has a high existing level of nighttime light and both nighttime and daytime glare due to its urban context. Overhead street lights surround the Project site on the northern and eastern sides. To the west and south of the Project site, street lights line the opposite side of the street/alley from the Project site. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

The Project site is located in an urban setting and is fully developed as an elementary school campus. The current uses generate nighttime light from security and parking lot lights and exterior building lights. Surrounding land uses also generate significant light from street lights, vehicle lights, parking lot lights, and exterior building security lights.

Nighttime illumination would be designed, arranged, directed, or shielded in accordance with existing applicable regulations and guidelines for school operations. An exterior lighting system with dimming would be designed to comply with 2016 Title 24 requirements. The built-in motion sensors at exterior lighting fixtures would

⁴⁷ LAUSD. 2015. School Upgrade Program Environmental Impact Report. Available at: http://achieve.lausd.net/ceqa ⁴⁸ Ibid.



automatically dim down lights to minimum security levels. Adherence to the applicable guidelines and regulations for school site lighting would avoid excess illumination and light spillover to adjacent land uses; therefore, implementation of the Project improvements would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the Project area.

Additionally, the exterior of the new buildings would be constructed of non-reflective building materials so vehicle headlights would not reflect glare for drivers.

With respect to all SUP projects, the Program EIR states that light and glare impacts would be less than significant with implementation of the required measures from the LAUSD School Design Guide and SCs AE-4, AE-5, and AE-6 to ensure that site lighting would have minimal off-site impacts.^{49,50}

The Project would not introduce lights at substantially greater intensities than existing lights on and near the site, and the Project would have no impact on nighttime views. With implementation of the required measures from the LAUSD School Design Guide and SCs AE-4, AE-5, and AE-6, light and glare impacts would be less than significant. No mitigation or further study is required.

⁴⁹ Ibid.

⁵⁰ Ibid.

	Less Than		
Potentially	Significant	Less Than	
Significant	with Mitigation	Significant	No
Impact	Incorporated	Impact	Impact

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?		
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?		\boxtimes
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526) or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?		
d. Result in the loss of forest land or conversion of forest land to non- forest use?		\boxtimes
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non- agricultural use or conversion of forest land to non-forest use?		\boxtimes

Explanation:

The Program EIR does not include any SCs for minimizing project impacts to agriculture and forestry resources. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to agriculture and forestry resources. The Project-specific analysis has determined that implementation of the proposed Project would result in no impacts to agriculture and forestry resources.

The Project site has been completely developed as a school site since 1896. There are no prime or unique farmlands or farmlands of local or statewide importance or suitable for such designation. There are also no forest or timberland reserves. Agriculture and forestry resources in the Project vicinity were evaluated with regard to the Farmland Mapping and Monitoring Program (FMMP) of the California Department of



Conservation, the Los Angeles City General Plan (City General Plan),⁵¹ the California Department of Conservation Williamson Act Contract Land website,⁵² and the Los Angeles City Zoning Code.⁵³

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The Project site is currently developed and void of any agricultural uses. The California Department of Conservation Important Farmland Map for Los Angeles County identified the Project site as urban and built-up land. Further, there is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the Project site. Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. No mitigation or further study is required.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. A Williamson Act contract is an agreement between private landowners and their city and/or county where the landowner voluntarily restricts their land to agriculture and compatible open-space uses. The Project site is void of agricultural uses and does not include land enrolled in a Williamson Act contract. Therefore, no impact would occur regarding conversion of existing agriculture uses or Williamson Act contracts. No mitigation or further study is required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. The proposed Project would not conflict with existing zoning of forest land or cause rezoning of forest land, timberland, or timberland zoned for Timberland Production. The proposed Project does not involve any changes to current General Plan land use or zoning designations for forest land, or timberland. Additionally, there are no timberland-zoned production areas within the Project site or surrounding areas. Therefore, no impact to forest land or timberland would occur. No mitigation or further study is required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The Project site and surrounding area contain no forest land. The Project site is located in an urbanized environment. Thus, implementation of the proposed Project would result in no impacts related to the loss or conversion of forest land to non-forest use. No mitigation or further study is required.

⁵¹ Los Angeles Department of City Planning. Adopted September 2001. Conservation Element of the City of Los Angeles General Plan. Available at: https://planning.lacity.org/cwd/gnlpln/consvelt.pdf

⁵² California Department of Conservation, Williamson Act Program. 2015-2016. Williamson Act Program Overview. Available at: https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx; map of Williamson Act contracts in Los Angeles County available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/

⁵³ City of Los Angeles Municipal Code, Chapter I, Planning & Zoning, SEC. 12.04.09, "PF" Public Facilities Zone.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project site does not contain agricultural or forest uses. The Project site is developed with school facilities. No changes to the existing environment would occur from implementation of the proposed Project that could result in conversion of farmland to nonagricultural use or forest land to non-forest use. Thus, no impact would occur. No mitigation or further study is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria establishe or air pollution control district may be relied upon to make the following			quality ma	nagement
Are significance criteria established by the applicable air district available to rely on for significance determinations?		Xes Yes		🗌 No
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?			\boxtimes	
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
c. Expose sensitive receptors to substantial pollutant concentrations?			\bowtie	
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			\boxtimes	

Explanation:

LAUSD has SCs for minimizing impacts to air quality. Applicable SCs related to air quality impacts associated with the proposed Project are provided below:

LAUSD	Standard Conditions of Approval
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.
SC-AQ-3	 Construction Contractor shall: Maintain speeds of 15 miles per hour (mph) or less with all vehicles. Load impacted soil directly into transportation trucks to minimize soil handling. Water/mist soil as it is being excavated and loaded onto the transportation trucks. Water/mist and/or apply surfactants to soil placed in transportation trucks prior to exiting the site. Minimize soil drop height into haul trucks or stockpiles during dumping. During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks. Cover the bottom of the excavated area with polyethylene sheeting when work is not being performed. Place stockpiled soil on polyethylene sheeting and cover with similar material. Place stockpiled soil in areas shielded from prevailing winds.
SC-AQ-4	 LAUSD shall analyze air quality impacts: If site-specific review or monitoring data of a school construction project identifies potentially significant adverse regional and localized construction air quality impacts, then LAUSD shall implement all feasible measures to reduce air emissions below the South Coast Air Quality Management District's (SCAQMD) regional and localized significance thresholds. Construction bid contracts shall include protocols that reduce construction emissions during high-emission construction phases from vehicles and other fuel driven construction engines, activities that generate fugitive dust, and surface coating operations. The Construction Contractor shall be responsible for documenting compliance with the identified protocols. Specific air emission reduction protocols include, but are not limited to, the following.

•	Exhaust Emissions
•	Schedule construction activities that affect traffic flow to off-peak hours (e.g. between 10:00 AM and 3:00 PM).
•	Consolidate truck deliveries and limit the number of haul trips per day.
•	Route construction trucks off congested streets, as permitted by local jurisdiction haul routes.
•	Employ high pressure fuel injection systems or engine timing retardation.
•	Use ultra-low sulfur diesel fuel, containing 15 ppm sulfur or less (ULSD) in all diesel construction equipment.
•	Use construction equipment rated by the United States Environmental Protection Agency as having at least Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits for engines between 50 and 750 horsepower.
•	Restrict non-essential diesel engine idle time, to not more than five consecutive minutes.
•	Use electrical power rather than internal combustion engine power generators.
•	Use electric or alternatively fueled equipment, as feasible.
•	Use construction equipment with the minimum practical engine size.
•	Use low-emission on-road construction fleet vehicles.
•	Ensure construction equipment is properly serviced and maintained to the manufacturer's standards.
•	Fugitive Dust
•	Apply non-toxic soil stabilizers according to manufacturers' specification to all inactive construction areas (previously graded areas inactive for 10 days or more).
•	Replace ground cover in disturbed areas as quickly as possible.
•	Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
•	Install wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash off trucks and any equipment leaving the site each trip.

The primary air pollutants of concern, for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the SCAQMD, is designated nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.⁵⁴ Air quality regulatory setting, meteorological conditions, existing ambient air quality in the Project vicinity, and CalEEMod air quality modeling for construction emissions are included as Appendix C, *Air Quality and Greenhouse Gas Emissions Background and Modeling Data*, to this Initial Study.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. The proposed Project would have a less than significant impact on the applicable Air Quality Attainment Plan, the Final 2016 SCAQMD Air Quality Management Plan (AQMP), as it does not increase population or employment, beyond regional projections, other than short-term employment associated with construction.⁵⁵ The City of Los Angeles is located within the SoCAB. Air emissions in the SoCAB are regulated by the SCAQMD. The SCAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the SoCAB is in non-attainment. Strategies to achieve these emissions reductions are developed in the AQMP, prepared by SCAQMD for the region. The AQMP is based on

⁵⁵ South Coast Air Quality Management District. 2016. Final 2016 AQMP. Available at: https://www.aqmd.gov/home/airquality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp



⁵⁴ California Air Resources Board. August 22, 2014. Area Designations Maps / State and National. Available at: http://www.arb.ca.gov/desig/adm/adm.htm.

Southern California Association of Governments (SCAG) population projections as well as land use designations and population projections included in City General Plans for those communities located within the Basin. Population growth is typically associated with the construction of residential units or large employment centers. A project would be inconsistent with the AQMP if it results in population and/or employment growth that exceeds growth estimates for the area.

The proposed Project would not result in population growth and would not cause an increase in currently established population projections beyond those established by SCAG and City of Los Angeles General Plan other than short-term increase in local employment in relation to construction of the modernization Project. The proposed Project does not include residential development or large local or regional employment centers and, thus, would not result in significant population or employment growth.

The Project is subject to the requirements of the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the SCAQMD. LAUSD would comply with all existing and new rules and regulations as they are implemented by the SCAQMD, CARB, and/or the EPA.

Emissions would be limited to short-term emissions during construction, and all feasible standard condition of approval would be applied to minimize exhaust emissions and fugitive dust. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases. The justification for the significance determination based on the detailed construction equipment lists, construction scheduling, and emissions calculations is provided in Appendix C.

The Project site is located within the SoCAB, which is characterized nonattainment for O_3 , and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS. State and federal air quality standards are often exceeded in many parts of the SoCAB, including those monitoring stations nearest to the Project's location. The Project site is an existing school site and the Project is intended to relieve congestion while maintaining a comparable school population

A preliminary construction schedule from LAUSD was used in conjunction with CalEEMod to estimate the construction emissions for criteria pollutants. Construction of the proposed Project has the potential to generate temporary criteria pollutant emissions through the use of heavy-duty construction equipment, such as excavators and forklifts, and through vehicle trips generated from worker trips and haul trucks traveling to and from the Project site. In addition, fugitive dust emissions would result from demolition and various soil-handling activities. Mobile source emissions, primarily NO_X, would result from the use of construction equipment such as dozers and loaders. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of construction activity, and prevailing weather conditions.

The worst-case daily emissions were calculated by CalEEMod as maximum daily construction emissions by year (Table 5, *Estimated Daily Construction Emissions [Unmitigated]*). Project construction is anticipated to start in the second quarter of 2021 and is expected to take 42 months to complete. While the phasing of the work has not yet been determined, this analysis assumes that there will be two 18-month phases; however, a single phase

of 21 months was modeled in CalEEMod. The SCAQMD construction threshold is specified in terms of pounds per day, so modeling with a single phase of 21 months would capture the daily maximum for criteria pollutant emissions over the 21-month period, which can then be compared to the SCAQMD construction thresholds for significance. As shown, construction-related daily emissions for the criteria pollutants (VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}) would be below the SCAQMD daily thresholds for significance. These calculations are unmitigated emissions and do not include measures such as dust control measures required to be implemented during each phase of development, as required by SCAQMD Rule 403 (Control of Fugitive Dust) and SC-AQ-2 through SC-AQ-4. SC-AQ-2 would obligate construction contractors to have off-road equipment properly tuned and maintained in accordance with the manufacturer's specifications. SC-AQ-3 would implement methods for reducing on-site dust emissions during soil removal. SC-AQ-4 is intended to reduce construction exhaust and fugitive dust emissions with a number of features including utilizing off-road construction equipment that is compliant with engine tier standards and applying soil stabilizers. Although emissions of $PM_{10}/PM_{2.5}$ (shown in Table 5) are not expected to exceed significance thresholds established by the SCAQMD, such emissions would be further reduced with the implementation of standard condition of approval for exhaust emission and fugitive dust (Table 6, Estimated Daily Construction Emissions [Mitigated]). Therefore, with respect to emissions from construction activities, impacts would be less than significant. No mitigation or further study is required.

	Construct	tion Emissio	ns (Pounds/	'Day)		
Construction Phase	VOCs	NOx	со	SOx	PM _{2.5}	PM ₁0
2021 maximum daily emissions	4.5	41.0	27.2	0.06	12.3	21.8
2022 maximum daily emissions	2.3	16.9	21.8	0.05	1.2	2.6
2023 maximum daily emissions	1.6	10.5	19.4	0.04	0.9	2.2
Maximum	4.5	41.0	27.2	0.06	12.3	21.8
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	No	No	No	No	No	No

 TABLE 5

 ESTIMATED DAILY CONSTRUCTION EMISSIONS (UNMITIGATED)

NOTE:

VOC = volatile organic compound; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter.

SOURCE:

Sapphos Environmental, Inc. February 13, 2019. CalEEMod 2016.3.2 Summer Output (Appendix C).



	Construct	tion Emissio	ns (Pounds/	'Day)		
Construction Phase	VOCs	NOx	со	SOx	PM _{2.5}	PM ₁₀
2021 maximum daily emissions	4.5	41.0	27.2	0.06	3.7	5.7
2022 maximum daily emissions	2.3	16.9	21.8	0.05	1.0	1.7
2023 maximum daily emissions	1.6	10.5	19.4	0.04	0.7	1.3
Maximum	4.5	41.0	27.2	0.06	3.7	5.7
SCAQMD daily significance construction threshold (pounds/day)	75	100	550	150	55	150
Significant?	Νο	No	No	No	No	No

TABLE 6 ESTIMATED DAILY CONSTRUCTION EMISSIONS (MITIGATED)

NOTE:

VOC = volatile organic compound; NO_x = oxides of nitrogen, CO = carbon monoxide, SO_x = oxides of sulfur; $PM_{2.5}$ = fine particulate matter; PM_{10} = coarse particulate matter.

SOURCE:

Sapphos Environmental, Inc. February 13, 2019. CalEEMod 2016.3.2 Summer Output (Appendix C).

With respect to modernization projects, the Program EIR states that operational activities would be less than significant, as these projects would not increase capacity to existing schools and net project emissions would be minimal. Additionally, overall LAUSD enrollment is forecast to decrease over the next 10 years and operational emissions are not expected to increase in the long-term. The proposed Project would replace or upgrade facilities on the campus, but it would not increase the number of students or faculty at the elementary school, and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. Therefore, impacts would be less than significant. No mitigation or further study is required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact. The proposed Project's impacts on criteria pollutants are limited to short-term construction impacts to modernize an existing school campus to relieve overcrowding with no substantial change in the school population; therefore, there would be no cumulatively considerable net increase in any criteria pollutant for which the Project area is in non-attainment. The Project area is nonattainment for O_3 and $PM_{2.5}$ under the California and National AAQS, nonattainment for PM_{10} under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS.

The Project would replace or upgrade facilities on the campus of Ascot ES, but it would not increase the number of students or faculty and would not introduce major new emission sources. Project emissions increase below significance thresholds would be limited to the construction phase only, which are demonstrated by the CalEEMod modeling. Due to the short duration of construction and the low emission levels during construction, there would be no cumulatively considerable net increase of the criteria pollutants for which the Project area is in non-containment: O_3 and $PM_{2.5}$ (under the California and National AAQS), PM_{10} (under the

California AAQS), and lead (Los Angeles County only under the National AAQS). The new buildings will replace existing buildings that would be removed as a part of the Project. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Construction emissions will be lower than the established SCAQMD significance thresholds.

The operation phase of the Project would not be expected to have any increase in criteria pollutants, as student enrollment would not change. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other on-site sources. Therefore, there would be no net increase in regional emissions of any criteria pollutant. No mitigation or further study is required.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. The proposed Project would result in less than significant impacts to sensitive receptors because localized construction emissions would be below the thresholds set by the SCAQMD. Sensitive receptors are persons who are more susceptible to air pollution than the general population, such as children, athletes, the elderly, and the chronically ill. Examples of land uses where substantial numbers of sensitive receptors are often found are schools, daycare centers, parks, recreational areas, medical facilities, nursing homes, and convalescent care facilities. The nearest sensitive receptors to the Project site are the existing students at Ascot ES. Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to pollutants. The nearest residential sensitive receptor is located to the south approximately 18 feet away from the fence (see Figure 4). However, due to the limited scale and the short duration of construction activities, the proposed Project would not expose sensitive receptors to substantial pollutant concentrations during construction. The proposed Project was analyzed against the Localized Significance Thresholds (LST) for the Source Receptor Area (SRA) 1 – Maywood (Central LA). LSTs are determined as a function of receptor distance. It is assumed construction would impact approximately 5 acres. The LST analysis uses a daily emissions threshold for NOx, CO, PM_{2.5}, and PM₁₀. The Final Significance Threshold Methodology revised in July 2008 includes the 1-hour NO2 Ambient Air Quality Standard in the derivation of the threshold. With dust control procedures that are included in SC-AQ-3 and SC-AQ-4, the proposed Project would result in less than significant impacts to students and the nearest resident (Table 7, Estimated Daily Construction Emissions - LST Analysis for 5 Acres).



	Construe	ction Emiss	ions (Pound	s/Day)		
Construction Phase	VOCs	NO _x	со	SOx	PM _{2.5}	PM ₁₀
Maximum Daily Emissions from project (mitigated for $PM_{2.5}$ and PM_{10})	4.5	41.0	27.2	0.06	3.7	5.7
Allowable emissions for 5 acres for a sensitive receptor located 25 meters from site boundary (pounds/day)	N/A	161	1,861	N/A	8	16
Significant?	No	No	No	No	No	No

TABLE 7 ESTIMATED DAILY CONSTRUCTION EMISSIONS - LST ANALYSIS FOR 5 ACRES

SOURCE:

South Coast Air Quality Management District. "Appendix C, LST Mass Rate Look-Up Tables. Final Localized Significance Threshold Methodology." June 2008. Available at: http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

Localized Operational Emissions

Less than Significant Impact. The proposed Project would result in less than significant impacts to sensitive receptors because localized operational emissions are expected to be lower than existing, baseline emissions. Operational emissions are not expected to increase in the long-term. The proposed Project would replace or upgrade facilities on the campus, but it would not increase the number of students or faculty at the elementary school, and would not introduce major new emission sources. No new vehicle trips would be generated, and there would be no increase in mobile source emissions. Furthermore, building upgrades and replacement of old, energy-inefficient structures with those that use less energy would reduce emissions from space heating and other onsite sources. Operational emissions from the proposed Project would therefore result in less than significant impacts to the nearest sensitive receptor.

Construction Emission Health Risk

Less than Significant Impact. The proposed Project would result in less than significant impacts to sensitive receptors because health risk from construction emissions would be within the standards set by the SCAQMD. Implementation of SC-AQ-2, for diesel powered construction equipment, and SC-AQ-4 for use of large, heavy construction equipment, would minimize impacts of DPM to ensure the risk is within the SCAQMD cancer risk threshold of 1 in a million and acute and chronic threshold of 1. Implementation of SC-AQ-3, to minimize construction emissions, and SC-HAZ-4, for handling and removal of contaminated soil, would minimize the impact of risk from contaminated soil on students, staff and nearby residents so that impacts would be less than significant.

Carbon Monoxide Hotspots

Less than Significant Impact. The proposed Project would result in less than significant impacts to sensitive receptors because there would not be an exceedance of the state CO one-hour standard of 20 ppm or the eighthour standard of 9.0 ppm. According to the Program EIR, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour-or 24,000 vehicles per hour where vertical and/or horizontal air does not mix-in order to generate a significant CO impact. This combination of stagnant

meteorology and high traffic volumes is a very conservative scenario that would not be met for this Project (see Appendix J). Due to existing equipment standards, operational emissions from natural gas burners and landscaping equipment would not be high enough to produce a CO hotspot. No mitigation or further study is required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The proposed Project would result in less than significant impacts to sensitive receptors because, as discussed in the Program EIR, schools are not one of the types of land uses typically associated with malodorous emissions such as wastewater treatment plants, and fiberglass manufacturing facilities. Furthermore, while landscaping equipment, such as lawnmowers and leaf blowers, generates exhaust fumes, the odors would be temporary. Odors that are currently associated with campus operations, including trash collection, would not change because of the proposed Project. Short-term construction-related odors would cease once construction of the Project is complete. Therefore, odor impacts associated with the Project would be less than significant. No mitigation or further study is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?				
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				\boxtimes
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				\square
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				\boxtimes

Explanation:

The following discussion is based in part on the Arborist Report prepared for the proposed Project (Appendix D, *Arborist Report*).

The Program EIR contains SCs for minimizing project impacts to biological resources. Applicable SCs related to potential impacts associated with the proposed Project are provided. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to biological resources.

LAUSD	Standard Conditions of Approval
SC-BIO-2	LAUSD shall protect sensitive wildlife species from harmful or disruptive exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting. All exterior light fixtures shall be listed as dark sky compliant as required under SC-AE-6.
SC-BIO-3	LAUSD shall comply with the following specifications related to bird and bat nesting sites: Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates ⁵⁶) should occur outside of avian breading season to avoid take of birds or their eggs. ⁵⁷

⁵⁶ Substrate is the surface on which a plant or animal lives.

⁵⁷ Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances that cause abandonment of active nests.

Bird Surveys - Construction Demolition or Vegetation Removal in or adjacent to Native Habitat

- For construction projects occurring in or adjacent to native habitat, a qualified LAUSD nesting bird Surveyor or qualified Biologist (Surveyor/Biologist) may determine that additional surveys are required outside of the breeding and nesting season (February 1st through August 31st, beginning January 1st for raptors) to determine if protected birds occupy the area (e.g. project site is adjacent to areas with suitable habitat for Southwestern willow flycatcher).
- If avoidance of the avian breeding season is not feasible, beginning 30 days prior to the initiation of the project activities, the Surveyor/Biologist with experience conducting nesting bird surveys shall conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys shall continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. In areas that contain suitable habitat for listed species, species-specific surveys shall be conducted by qualified Biologist authorized by the regulatory agencies.
- If a protected bird is observed, additional protocol-level surveys may be required to determine if the sighting was a transient individual or if the site is used as nesting habitat for that species. Project activities shall be delayed until there is a final determination.
- If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests), or as
 determined by the Surveyor/Biologist shall be delayed until the nest is vacated and juveniles have fledged and
 there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing shall be used
 to demarcate the boundary of the 300- or 500-foot buffer between the project activities and the nest or tree.
 Project personnel, including all Construction Contractors working on site, shall be instructed on the sensitivity of
 the area. Protective measures shall be documented to show compliance with applicable State and Federal laws
 pertaining to the protection of birds.
- If the Surveyor/Biologist determines that a narrower buffer between the project activities and active nests is warranted, a written explanation for the change shall be submitted to the LAUSD OEHS CEQA Project Manager. If approved, the Surveyor/Biologist can reduce the demarcated buffer.
- A Surveyor/Biologist shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain outside the demarcated buffer and that the flagging, stakes, and/or construction fencing are maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager during the grubbing and clearing of vegetation, and shall notify LAUSD immediately if project activities damage avian nests.

Bird Surveys - Construction, Demolition, or Vegetation Removal at Existing Campuses

- If avoidance of the avian breeding season is not feasible, the Surveyor/Biologist with survey experience shall conduct a nesting bird surveys to determine if active nests are within or adjacent to the work area.
- The survey shall be conducted no more than 3 days prior to construction activities. A memo describing results of the survey shall be submitted to the OEHS CEQA Project Manager.
- If an active bird nest is observed, the Surveyor/Biologist shall determine the appropriate buffer around the nest. Buffers are determined on species-specific requirements and nest location.
- The Monitor shall send weekly monitoring reports to LAUSD OEHS CEQA Project Manager.
- No construction activity shall occur within the buffer zone until nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting.

Bat Surveys

	Dat Surveys
	 Bat species inventories and habitat use studies shall be completed for demolition or new construction projects in native habitat as well as projects that require the removal of mature conifer, cottonwood, sycamore or oak trees or abandoned buildings.
	 Bat surveys must be conducted by a qualified bat Surveyor or Biologist (Surveyor/Biologist). The Surveyor/Biologist shall use the appropriate combination of structure inspection, sampling, exit counts, and acoustic monitors to survey an area that may be affected by the project.
	 If bats are found, the Surveyor/Biologist shall identify the species and evaluate the colony to determine potential impacts.
	 Mitigation measures shall be determined on a project-specific basis and may include: Avoidance
	 Humane exclusion prior to demolition Bats should not be evicted from roost sites during the reproductive period (May-September), or during winter hibernating periods to avoid direct mortality Bats should be flushed from trees prior to felling or trimming.
	 Off-site habitat improvements shall be conducted in coordination with the California Department of Fish and Wildlife.
SC-BIO-4	LAUSD shall comply with the following conditions if a new school would be located in an area containing native habitat or if a protected tree would be removed from an existing campus:



	 New Construction in Native Habitat LAUSD shall avoid constructing new schools in areas containing mature native protected trees to the extent feasible. If site avoidance is not feasible, individual trees should be protected. If protected trees may be impacted, the following condition(s) may be required: Translocation of rare plants is prohibited in most instances. CDFW, in most cases does not recommend translocation, salvage, and/or transplantation of rare, threatened, or endangered plant species, in particular oak trees, as compensation for adverse effects because successful implementation of translocation is rare. Even if translocation is initially successful, it will typically fail to persist over time. Permanent conservation of habitat. To ensure the conservation of sensitive plant species, the preferred method is permanent conservation of habitat containing these species; any translocation proposed shall only be an experimental component of a larger, more robust plan. Offsite acquisition of woodland habitat. Due to the inherent difficulty in creating functional woodland habitat with associated understory components, the preferred method is off-site acquisition of woodland habitat in the local area. All acquired habitat shall be protected under a conservation easement and deeded to a local land conservancy for management and protection. Creation of woodlands. Any creation of functioning woodlands shall be of similar composition, structure, and function of the affected woodland. The new woodland shall mimic the function, demonstrate recruitment, plant
	 density, canopy, and vegetation cover, as well as other measurable success criteria before the measure is deemed a success. All seed and shrub sources used for tree and understory species in the new planting site shall be collected or grown from on-site sources or from adjacent areas and may be purchased from a supplier that specializes in native seed collection and propagation. This method should reduce the risk of introducing diseases and pathogens into areas where they might not currently exist. Woodland species should be replaced by planting seeds. Monitoring efforts, including the exclusion of herbivores, shall be employed to maximize seedling survival during the monitoring period. Monitoring period for woodlands shall be at least 10 years with a minimum of seven years without supplemental irrigation. This allows the trees to go through one typical drought cycle. This should also be the minimal time needed to see signs of stress and disease and determine the need for replacement plantings.
	LAUSD shall request CDFW review and comment on any translocation plans, habitat preservation, habitat creation and/or restoration plans. Removal of Protected Trees on Existing Campuses LAUSD shall comply with the LAUSD OEHS Tree Trimming and Removal Policy. This policy ensures the management of District trees while ensuring that District activities will not conflict with locally adopted tree preservation policies and ordinances.
SC-BIO-5	 LAUSD shall comply with CDFW recommendations: Project development or conversion that results in a reduction of wetland acreage or wetland habitat values shall not occur unless, at a minimum, replacement or preservation results in "no net loss" of either wetland habitat values or acreage. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and offsite wildlife populations. A jurisdictional delineation of creeks and their associated riparian habitats shall be conducted pursuant to the USFWS wetland definition. Implementation of recommended measures shall compensate for affected mature riparian corridors and loss of function and value of wildlife corridors.

The Project site is located in the highly urbanized area of the City of Los Angeles and has been developed and used as an active elementary school campus within an urbanized setting containing school buildings and facilities since 1896. The 5.3-acre Project site consists of 5.1 acres of hardscape and 0.2 acre of softscape surfaces with non-native ornamental vegetation. The Arborist Report inventoried 67 mature trees on the Project site, none of which are afforded protection by federal, state, or local statutes and guidelines (see Appendix D).

The campus is fully developed and does not contain any habitat to support candidate, sensitive, or special status species. Special-status plant and wildlife species are those that are candidates, proposed or listed as threatened or endangered by the U.S. Fish and Wildlife Service (USFWS) or the California Department of Fish and Wildlife

(CDFW), and plant species that are considered sensitive by the California Native Plant Society (CNPS). The proposed Project site is located in the southwestern-most portion of the Los Angeles, California USGS 7.5minute topographic quadrangle, and is bordered by three additional quadrangles including Hollywood, Inglewood, and South Gate, California. According to searches of the CDFW California Natural Diversity Database (CNDDB), CNPS Rare Plant Inventory, and USFWS Information, Planning, and Consultation System (IPAC) of those four quadrangles, there are 54 species in the vicinity of the Project site that are considered special-status by local, State and/or federal agencies (Appendix E, *Biological Resources Database Search Results*). However, the Project site does not contain suitable habitat necessary to support special-status wildlife species or designated critical habitat for any species listed as rare, threatened, or endangered pursuant to the federal Endangered Species Act (FESA).

Ninety-six percent of the Project site consists of hardscape surfaces with remaining softscape areas containing non-native ornamental vegetation, presenting an absence of any sensitive natural communities designated by City or regional plans, policies, or regulations by CDFW or USFWS.

According to a search of the USFWS National Wetlands Inventory (NWI) and site assessment, there are no federally or State protected wetlands or Waters of the U.S. within the Project site as defined by Section 404 of the Clean Water Act or Section 1600 of the State Fish and Game Code.

As a fully developed and urbanized area, the Project site does not serve as a migratory corridor or nursery site capable of facilitating the movement of any native resident or migratory fish or wildlife species. However, mature trees may provide habitat for nesting birds afforded protection pursuant to the Migratory Bird Treaty Act (MBTA). The nearest identified habitat linkage occurs in the Santa Monica Mountains, which are approximately 10 miles northwest, outside the potential impact area for the proposed Project.

The Arborist Report inventoried a total of 67 mature trees within the Project site not afforded protection pursuant to the LAUSD OEHS Tree Trimming and Removal Procedure or any other local ordinances or policies protecting biological resources, including policies defined in the City of Los Angeles General Plan Conservation Element.

The Project site is not located within any existing or proposed Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved local, regional, or State habitat conservation plan.^{58,59}

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. The Project site contains no native vegetation capable of supporting any special-status plant or wildlife species. The Project site is completely developed and surrounded by residential development. According to site reconnaissance as well as a review of historical records including the CNDDB, CNPS Rare



⁵⁸ California Department of Fish and Wildlife. 2018. California Regional Conservation Plans. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline

⁵⁹ U.S. Fish and Wildlife Service. 2018. Environmental Conservation Online System. Available at: https://ecos.fws.gov/ecp0/conservationPlan/

Plant Inventory, and IPAC, no species that are identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or protected by the CDFW or USFWS are located within the Project Site. The likelihood of species dispersal, whether plants or wildlife, from surrounding areas to the Project Site is extremely low. Therefore, the Project would have no impact on special-status species. No mitigation or further study is required.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?

No Impact. The Project site does not contain any riparian habitat or state-designated sensitive plant community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS as determined by site reconnaissance and database search results. The Project site does not contain any natural drainages or water courses, which would potentially support riparian, wetland, or aquatic habitat, or natural undeveloped areas that may contain any other sensitive natural community afforded protection pursuant to Section 1600 of the State Fish and Game Code. Therefore, there would be no impact. No mitigation or further study is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A database search of the NWI and site reconnaissance indicated that no wetlands protected by CDFW pursuant to Section 1600 of the State Fish and Game Code or Section 404 of the Clean Water Act occur on the Project site. The Project site does not contain any waterways or undeveloped land capable of supporting federally protected wetlands. Therefore, no impact to wetlands, aquatic habitats, or other Waters of the U.S. afforded protection under Section 404 of the Federal Clean Water Act or Section 1600 of the State Fish and Game Code would occur through direct removal, filling, hydrological interruption or other means. No mitigation or further study is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact. The Project site does not contain any water courses or greenbelts for wildlife movement, or native vegetation and undeveloped land capable of supporting fish or the movement of wildlife, particularly corridors that facilitate movement of species between larger stands of native habitat. Therefore, the proposed Project would not impede the use of migratory wildlife corridors.

The Arborist Report (Appendix D) inventoried 67 mature trees in the Project site with the potential to provide breeding habitat for birds afforded protection pursuant to the MBTA during the breeding season (February 1 through August 31), with up to 44 trees that will be removed (see Figure 11). Tree removal, building demolition, and construction-related noise and vibration may have the potential to disrupt birds that are nesting in the trees or buildings during breeding season. Therefore, construction activities (including demolition) have the potential to impact nesting birds. However, the proposed Project would implement SC-BIO-3 so that removal of the 44 trees will occur outside of the nesting season. If avoidance of breeding season is not feasible, implementation

of SC-BIO-3 including pre-construction clearance surveys, monitoring of nesting birds during vegetation clearing, and protective buffer zones surrounding observed nests during construction activities would reduce impacts to less than significant. No mitigation or further study is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. A survey of mature trees within the Project site by a licensed arborist resulted in an inventory of 67 mature trees, none of which are afforded protection by federal, state, or local statutes and guidelines (see Appendix D). Up to 44 non-protected trees of various species would be removed as a part of the proposed Project. The remaining 23 trees of various species are located along sidewalks of the western, northern, and eastern perimeters of the Project site and would not be removed. None of the 67 trees within the Project site are considered protected under the LAUSD OEHS Tree Trimming and Removal Procedure. No impacts related to conflicts with local policies or ordinances protecting biological resources would occur. No mitigation or further study is required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project site is not located within an existing or proposed HCP, NCCP, or similar plan.⁶⁰ The site is not located within or proximate to any Land Trust, or Conservation Plan, or County of Los Angeles Significant Ecological Area.⁶¹ As such, no impact would occur. No mitigation or further study is required.



⁶⁰ California Department of Fish and Wildlife. 2018. California Regional Conservation Plans. Available at: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline

⁶¹ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?			\boxtimes	
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			\boxtimes	
c. Disturb any human remains, including those interred outside of dedicated cemeteries?			\boxtimes	

Explanation:

The Program EIR contains 11 SCs for minimizing Project impacts to cultural resources. Applicable SCs related to potential impacts associated with the proposed Project are provided. Projects implemented under the SUP were determined in the Program EIR to result in potentially significant impacts to cultural resources (historical).

were determined in the Program EIR to result in potentially significant impacts to cultural resources (historical). LAUSD Standard Conditions of Approval SC-CUL-LAUSD shall retain a qualified Archaeologist to be available on-call. The Archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39). The archaeologist must have knowledge 6 of both prehistoric and historical archaeology. To reduce impacts to previously undiscovered buried archaeological resources, following completion of the final grading plan and prior to any ground disturbance, a qualified archaeologist shall prepare an Archaeological Monitoring Program as described under SC-CUL-7. SC-CUL-The Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD. LAUSD shall retain an Archaeologist that meets the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. Ground-disturbing activities shall not continue until the discovery has been assessed by the Archaeologist and the Archaeologist shall be afforded the necessary time to recover and assess the find. If the find is determined to be of value, shall prepare an Archaeological Monitoring Program and monitor the remainder of the ground-disturbing activities. Significant archaeological resources found shall be curated as determined necessary by the Archaeologist and offered to a local museum or repository willing to accept the resource. Archaeological reports shall be submitted to the South Central Coastal Information Center at the California State University, Fullerton. The Archaeological Monitoring Program measures to ensure the protection of any other possible resources. With monitoring, construction activities may continue on other areas of the project site during evaluation and treatment of historic or unique archaeological resources. The Archaeological Monitoring Plan shall include: - Extent and duration of the monitoring based on the grading plans - At what soil depths monitoring of earthmoving activities shall be required - Location of areas to be monitored - Types of artifacts anticipated - Procedures for temporary stop and redirection of work to permit sampling, including anticipated radius of suspension of ground disturbances around discoveries and duration of evaluation of discovery to determine whether they are classified as unique or historical resources - Procedures for maintenance of monitoring logs, recovery, analysis, treatment, and curation of significant resources - Procedures for archaeological resources sensitivity training for all construction workers involved in moving soil or working near soil disturbance, including types of archaeological resources that might be found, along with laws for the protection of resources. The sensitivity training program shall also be included in a worker's environmental awareness program that is prepared by LAUSD with input from the Archaeologist, as needed. - Accommodation and procedures for Native American monitors, if required. - Procedures for discovery of Native American cultural resources.

	 The construction manager shall adhere to the stipulations of the Archaeological Monitoring Plan. The Archaeologist shall have the authority to halt any project-related construction activities that could impact potentially significant resources
SC-CUL- 8	Cultural resources sensitivity training shall be conducted for all construction workers involved in moving soil or working near soil disturbance. This training shall review the types of archaeological resources that might be found, along with laws for the protection of resources and shall be included in a worker's environmental awareness program that is prepared by LAUSD with input from a qualified Archaeologist, as needed.
SC-CUL- 9	LAUSD shall determine whether it is feasible to prepare and implement a Phase III Data Recovery/Mitigation Program. If feasible, the Archaeologist shall prepare a Phase III Data Recovery/Mitigation Program to outline procedures to recover a statistically valid sample of the archaeological remains and to document the site and reduce impacts to be less than significant. All documentation shall be prepared in the standard format of the ARMR Guidelines, as prepared by the OHP. Once a Phase III Data Recovery/Mitigation Program is completed, an Archaeological Monitor shall be present to oversee the ground-disturbing activities to ensure that construction proceeds in accordance with the Program.
SC-CUL- 10	All work shall stop within a 30-foot radius of the discovery. Work shall not continue until the discovery has been evaluated by a qualified Archaeologist and the local Native American representative has been contacted and consulted to assist in the accurate recordation and recovery of the resources.

As documented in the HRER (Appendix A), the subject property is ineligible for federal, state, or local designation and the campus is not considered a historical resource for the purposes of CEQA.

As documented in the Program EIR and confirmed in an updated records search at the South Central Coastal Information Center (SCCIC), there are no known archaeological resource on or within a one-half-mile radius of the proposed Project site. Because the proposed Project site has been subject to grading and other ground disturbing activities, remains of archaeological value are not anticipated to be present on the Project site. There are no known archeeological resources in the near surface environment and there is a low potential to encounter resources in native soils that underlay the existing developed campus.

Based on a review of the Program EIR and an updated records search at the Los Angeles County Natural History Museum, there are no known vertebrate paleontological resources within the proposed Project site. Surface deposits in the entire proposed Project area consist of younger Quaternary Alluvium, derived predominantly as fluvial deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel just to the east. These younger Quaternary deposits typically do not contain significant fossil vertebrates, at least in the uppermost layers and have a low potential to yield resources

Based on a review of USGS topographic maps, an updated records search at the SCCIC, and the known history of use of the site there has not been a formal cemetery on the site and there is a low potential to encounter human remains in relation of the historic land uses of the site, including occupation by indigenous people.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact. The proposed Project would not cause a substantial adverse change in the significance of a historical resource. The findings of the Program EIR were reviewed during the preparation of this document. The assumptions and data that were used to make the determination in the Program EIR remain valid. Ascot Elementary School was not identified as a resource in the *Los Angeles Unified School District Historic Context Statement.*⁶² Additionally, the HRER found the property ineligible for federal, state, or local designation under any applicable criteria. The property has been extensively altered since its first construction in the 1920s,



⁶² LAUSD. 2014. LAUSD Historic Context Statement, 1870-1969. Prepared by Sapphos Environmental, Inc.

and is not considered a historical resource for the purposes of CEQA (Appendix A). The school encompasses 5.3 acres and contains 10 permanent and 12 portable buildings and structures. No built resources at the school are significant. The oldest building on the campus dates to 1925, but it has substantially altered over time, as have many other buildings and structures at the school (Appendix A). Therefore, less than significant impacts to historic resources would result from the proposed Project. No mitigation or further study is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact. Implementation of the proposed Project would not cause a substantial adverse change in the significance of an archaeological resource. Based on a review of the Program EIR and an updated records search at CHRIS and the Los Angeles Natural History Museum, there are known archaeological resource occurs on or within a one-half-mile radius of the proposed Project site (Appendix A). Because the proposed Project site has been subject to grading and other ground disturbing activities, remains of archaeological value are not anticipated to be present on the Project site. Though it is unlikely that archeological resources are present on the proposed Project site, it is possible that construction activity could unearth archeological resources. If archeological resources are discovered during construction, LAUSD shall implement standard conditions SC-CUL-6 through -9 for evaluating and appropriately treating the archaeological resources. Therefore, impacts would be less than significant. No mitigation or further study is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact. The proposed Project would not disturb any human remains, including those interred outside of formal cemeteries. Because the proposed Project site has been previously disturbed remains are not expected. Though it is unlikely, it is possible that construction activity could unearth previously unknown human remains. If this were to occur during construction, the LAUSD shall implement the process specified by SC-CUL-10 and Section 7050.5 of the California Health and Safety Code. The Los Angeles County Coroner will be notified, and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition. Therefore, impacts would be less than significant. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy: Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			\boxtimes	
b. Conflict with or obstruct a state or local plan for renewable energy efficiency?				\square

Explanation:

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The Program EIR contains one SC for minimizing project impacts to GHG emissions and utilities and service systems that is applicable to energy. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to GHG emissions and utilities and service systems.

LAUSD	LAUSD Standard Conditions of Approval		
SC-AQ-2	Construction Contractor shall ensure that construction equipment is properly tuned and maintained in accordance with manufacturer's specifications, to ensure excessive emissions are not generated by unmaintained equipment.		
SC-GHG- 1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.		
SC-GHG- 2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.		
SC-GHG- 3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.		
SC-GHG- 4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.		
SC-GHG- 5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.		
SC-USS- 1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:		
	School Design Guide. Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.		
	Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.		

The proposed Project would be designed to meet CHPS criteria for energy performance and includes an energy management system. LAUSD is committed to sustainable construction principles and has been a member of the CHPS since 2001. CHPS has established criteria for the development of high-performance schools to create



a better educational experience for students and teachers by designing the best facilities possible. CHPSdesigned facilities are healthy, comfortable, energy efficient, material efficient, easy to maintain and operate, commissioned, environmentally responsive site, a building that teaches, safe and secure, community resource, stimulating architecture, and adaptable to changing needs. The proposed Project would comply with CHPS and LAUSD sustainability guidelines.

Electrical Power. Electrical power in the City of Los Angeles, including the Project site, is supplied by the Los Angeles Department of Water and Power (LADWP). Electricity provided by the LADWP is generated from a diverse mix of power sources, including coal, natural gas, nuclear, and large hydropower, in addition to renewable sources such as wind, solar, small hydroelectric, biomass & bio-waste, and geothermal. The 2016 Power Integrated Resources Plan (IRP) is a 20-year roadmap guiding LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost-effective manner. The IRP assumes that new construction and replacement construction will increase energy efficiency by 15 percent as part of the overall attainment strategy.⁶³

Overhead electrical distribution lines (110–161 kilovolt) operated by Southern California Edison are located approximately 20 feet south and 9 feet west of the Project site, on the opposite side of the alley and on the sidewalk along Ascot Avenue.⁶⁴ Additionally, one wooden electrical distribution line pole is located in the northwestern corner of the project site (in the teacher parking lot).

AC Martin prepared a site analysis report in 2018 that characterized baseline conditions for energy resources on-site.⁶⁵ Power distribution for the campus is provided by an outdoor 277/480V, 3 phase, 4 wire, 1200 amp 65KAIC main switchboard "MS." The switchboard appears to have been provided in 1998 and is manufactured by Eaton. It is located at the north-west quadrant of the campus. The switchboard "MS" is supplied power from an outdoor LADWP pad mounted 750 KVA transformer at the northwest corner of the campus. Based on provided utility consumption report, the campus was once served by a total of four water meters. Only two were located during site visits by AC Martin in 2018 and through review of the provided as-built drawings. Based on provided utility consumption report, the campus was served by a total of three gas meters. The first gas meter is located on north side of property off Vernon Avenue. The second gas meter is located on the southern side of Building 2. The third gas meter was not located during site investigation or on as-built documents.

Water Consumption. Water supply in the City of Los Angeles, including the Project site, is supplied by LADWP. Substantial energy is required to pump and transport water into the Los Angeles basin. Source water extraction, treatment and local distribution also require significant amounts of energy. The Los Angeles Aqueduct, local groundwater, and supplemental water purchased from the Metropolitan Water District of Southern California (MWD) are the primary sources of water for the city. LADWP has initiated a study to determine the nexus between water and energy consumption, and to evaluate the associated carbon footprint of its water supply sources. The water purchased from MWD is the most energy intensive source of water for

⁶³ Los Angeles Department of Water and Power. 2016. 2016 Power Integrated Resource Plan.

⁶⁴ California Energy Commission. 2016. Local Reliability Areas with Transmission Lines and Substations for 2016. Enlargement Area: Los Angeles. Available at: https://www.energy.ca.gov/maps/

⁶⁵ AC Martin. July 9, 2018. Site Analysis Report – 10368157. Ascot Elementary School, 1447 East 45th Street, Los Angeles CA 90011. Prepared for LAUSD.

LADWP. This is followed by the production of recycled water and the treatment of groundwater.⁶⁶ Because water supplies are declining due to environmental degradation and impacts from climate change, the LADWP is implementing recycled water projects to fill a larger portion of the city's water supply portfolio. In addition, stormwater capture projects for groundwater recharge are also being developed.⁶⁷ The California Urban Water Management Planning Act (effective January 1, 1984) requires that every urban water supplier prepare and adopt an Urban Water Management Plan (UWMP) every 5 years. The LADWP's 2015 UWMP is the most recent plan available. It is the city's master plan for water supply and resources management and is consistent with the City's goals and policy objectives.⁶⁸ Total water demand varies from year-to-year and is influenced by population growth, weather, water conservation efforts, drought, and economic activity. From fiscal year (FY) 2012/13 through FY 2014/15, drought conditions triggered State and City mandatory conservation measures. This helped to reduce water use by 13 percent from FY 2013/14 to FY 2014/15. Since 1991, the City of Los Angeles has recognized that water conservation is a foundation to improve water supply reliability. Water use must be characterized as either indoor or outdoor use in order to determine the potential for water use efficiency and target conservation programs. The city is currently aiming for a 25 percent per capita reduction in potable water by 2035, using FY 2013/14 as a baseline.

Natural Gas. As stated in the SUP Program EIR, natural gas is provided to the City of Los Angeles including the project site by the Southern California Gas Company (SoCalGas). SoCalGas obtains most of its natural gas supply from sources outside of California, primarily from basins in the western United States and Canada, including New Mexico, West Texas, and the Rocky Mountains.⁶⁹ According to the Southern California Gas Company's website, SoCalGas owned or operated high-pressure distribution lines are located immediately west of the project site, below Ascot Avenue.⁷⁰

Petroleum Based Fuel. California currently imports two-thirds of its petroleum from out-of-state, and accounts for about 10 percent of U.S. gasoline and diesel consumption. In 2011, over 390 million barrels of crude oil were used to produce gasoline and diesel fuel consumed in California.⁷¹ In 2014, the most recent data available, transportation accounted for approximately 37 percent of California's greenhouse gas emissions. Therefore, the state has made the transformation of its transportation system away from fossil fuels to zero-emission and near-zero-emission vehicles powered by electricity from renewable sources a fundamental part of its efforts to achieve its climate goals.⁷² The transformation of the transportation sector is also necessary to

⁷² California Energy Commission. 2016. 2016 Integrated Energy Policy Report Update. Publication Number: CEC-100-2016-003-CMF. Available at: https://www.energy.ca.gov/2016_energypolicy/



⁶⁶ Los Angeles Department of Water and Power. December 2016. 2016 Power Integrated Resource Plan. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_adf.ctrlstate=16pwdho46a_4&_afrLoop=601246270217941

⁶⁷ Los Angeles Department of Water and Power. n.d. Sources of Supply. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-sourcesofsupply

⁶⁸ Los Angeles Department of Water and Power. Approved April 27, 2016. 2015 Urban Water Management Plan. Available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=16pwdho46a_4&_afrLoop=601303253779685

⁶⁹ California Gas and Electric Utilities. 2018. 2018 California Gas Report. Available at: https://www.socalgas.com/regulatory/cgr.shtml

⁷⁰ Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at: http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335

⁷¹ Governor's Interagency Working Group on Zero-Emission Vehicles. February 2013. 2013 ZEV Action Plan: A Roadmap toward 1.5 Million Zero-emission Vehicles on California Roadways by 2025. Available at: http://opr.ca.gov/docs/Governors_Office_ZEV_Action_Plan_(02-13).pdf

achieve the governor's goal of placing 1.5 million zero-emission vehicles on California's roadways and displacing 1.5 billion gallons of petroleum fuels by 2025.⁷³ The City of Los Angeles is also taking steps to reduce its reliance on petroleum fueled vehicles. In 2017-2018, the City of Los Angeles Department of Transportation (LADOT) completed safety improvements to 585 continental crosswalks along Vision Zero Priority Corridors and 640 traffic signals on the High Injury Network (see Pedestrian Safety analysis), installed 12 on-street electric vehicle charging stations, launched an electric vehicle car share program BlueLA with a goal of 40 total stations in areas identified as underserved communities, and was awarded a \$36.1 million grant for the purchase of 112 DASH electric buses, additional chargers, and maintenance yards.⁷⁴

The vehicles miles traveled (VMT) for the school was not estimated as part of the air quality and greenhouse gas (GHG) assessment conducted for the Project because the existing vehicle miles traveled would not change with the upgrade and modernization of the Campus.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The proposed Project would result in less than significant impacts regarding wasteful, inefficient or unnecessary consumption of energy resources because it would involve the replacement of 18 less energy-efficient buildings (constructed between 1923 and 1977) with new buildings that would comply with more energy-efficient regulations. The proposed Project would result in approximately 3,937 additional square feet of buildings on the Ascot ES campus and provide eight fewer teaching stations than the baseline condition. Implementation of SC-GHG-5 would be required.

Construction:

The proposed Project would result in less than significant impacts during construction regarding wasteful, inefficient or unnecessary consumption of energy resources. Construction of the proposed Project would consume energy from off-road construction vehicles and equipment, as well as on-road vehicles used for construction worker travel to and from the site and delivery and haul trips. Energy consumed during construction would also be required to produce and convey the water needed for dust control. The construction equipment and haul trucks that are needed for construction are described in the project description.

During construction, electricity for water supply and petroleum fuels used for on- and off-site construction equipment would be consumed. All construction vehicles and equipment would be in compliance with fuel efficiency standards,^{75,76} equipment tier standards⁷⁷ and SC-AQ-2, SC-AQ-5, SC-GHG-1, SC-GHG-2, SC-GHG-3, SC-GHG-4, SC-GHG-5, and SC-USS-1, thus ensuring the impacts on energy use and GHG emissions

⁷³ Office of the Governor of California. March 23, 2012. Executive Order B-16-2012. Available at: https://www.ca.gov/archive/gov39/2012/03/23/news17472/index.html

⁷⁴ Los Angeles Department of Transportation. January 8, 2019. LADOT Annual Report, Fiscal Year 2017-2018. Available at: https://ladot.lacity.org/what-we-do/about-us/plans-and-reports

⁷⁵ South Coast Air Quality Management District. n.d. Construction Equipment Regulations. Available at: https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/facility-based-mobile-source-measures/regscommitments

⁷⁶ National Highway Traffic Safety Administration. n.d. Phase 2 Fuel Efficiency Standards. Available at: https://www.nhtsa.gov/staticfiles/rulemaking/pdf/cafe/MDHD2_Draft-EIS_6192015.pdf

⁷⁷ California Air Resources Board. n.d. Off Road and On Road Diesel Vehicles. Available at: https://ww3.arb.ca.gov/diesel/mobile.htm

and would be less than significant. In addition, construction activities would be temporary. Therefore, there would be no long-term energy impacts associated with the construction of the proposed Project.

Operations:

The proposed Project would result in no impacts during operations regarding wasteful, inefficient or unnecessary consumption of energy resources because it would involve the replacement of 18 less energyefficient buildings (constructed between 1925 and 1977) with new buildings that would comply with the more energy-efficient provisions of the current California Building Standards Code (Title 24, California Code of Regulations [CCR]), SC-GHG-5, CHPS criteria, and applicable California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) mandatory measures.⁷⁸ With the installation of a photovoltaic ready electrical system for each building, low water use fixtures compliant with the 2016 California Plumbing Code, an energy-efficient LED lighting fixture and daylighting lighting system with daylight and occupancy sensors consistent with 2018 LAUSD School Design Guidelines,⁷⁹ and implementation of SC-GHG-5 for energy efficiency, the new buildings would be 15 percent more energy-efficient than the existing condition, consistent with the City of LA IRP goals and LAUSD design goals for energy efficiency. Energy used during the operation of the proposed Project would be consumed by the street lights, pedestrian lighting, and the supply of water for interior water use and landscaping, as well as for the existing and buildings on campus. Each new building would be provided with a super-efficient 480-120/208V, 3P 4W copper winding transformer, 115 degree rise 2016 Department of Energy (DOE) compliant for power applications. The four existing buildings that would remain (constructed between 1965 and 2004) would be re-fed from a new main distribution switchboard with new underground feeders sized appropriately for demand load. Each new building would be installed with a main distribution switchboard sized for the electrical load and future expansion, with one empty section in the main switchboard for a photovoltaic system. The proposed Project would provide adequate space and point to point infrastructure (sized per an alternative energy study) for photovoltaic distribution boards and inverters. The proposed Project would require a kilo-volt amp (kVA) load of approximately 1,079.5 kVA for new LADWP service (Table 8, Load Calculation for New Service). Therefore, the proposed Project would conform with CHPS criteria for energy performance, energy management system, advanced energy management and submetering, and natural ventilation and energy conservation standards.



⁷⁸ California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: http://www.bsc.ca.gov/Home/CALGreen.aspx

⁷⁹ LAUSD, Facilities Services Division. February 27, 2018. 2018 School Design Guide. Available at: http://www.laschools.org/documents/file?file_id=313980386

Building Type	Power Load (kVA)	Lighting Load (kVA)	Total Load (kVA)
Admin	55	5	60.0
MPR	86.9	7.9	94.8
Food Service	48.4	4.4	52.8
Maintenance	12.1	1.1	13.2
Library	26.4	2.4	28.8
Kinder Classroom	192.5	17.5	210.0
Classroom	330	30	360.0
Site	20	60	80.0
			899.6
Future Margin			179.9
Total Load (kVA)			1,079.5
Total Load (amp) @480V			1,299.1

TABLE 8 LOAD CALCULATION FOR NEW SERVICE

NOTE:

Calculations were made based on the following assumptions:

Electrical: Provide new 277/480V, 3P, 4W, 1600A, main distribution switchboard with meter located in the same vicinity as new electrical service from LADWP. Each new building will be provided with a super-efficient 480-120/208V, 3P 4W copper winding transformer, 115 degree rise 2016 DOE compliant for power applications. Consistent with Energy Performance CHPS Criteria (EE 1.0).

Lighting: Lighting system are generally 277 volts fed from 277/480 volts, 3P, and 4W panelboards. Lighting fixtures selection criteria follows 2018 LAUSD Design Guidelines. The lighting system is designed to provide 35-50 foot-candles at the student's desks and adequate levels at vertical surfaces per 2018 LAUSD Design Guide and IES standards. Recessed LED lighting fixture are designed for multi-purpose room to provide 30-50 foot-candles of lighting. Surface mounted vandal-proof LED lighting fixtures are designed for lunch shelter to provide 30 foot-candles of lighting. Surface mounted vandal resistance LED lighting fixtures are designed for staff and student restrooms to provide 10 foot-candles of lighting. Recessed mounted vandal-proof LED lighting fixtures wall mounted on building exterior will be designed to provide 2 foot-candles of lighting at exterior walkways. An exterior lighting system with dimming would comply with 2016 Title 24 requirements. Consistent with Electric Lighting Performance CHPS Criteria (EQ 13.2).

An exterior lighting system with dimming would be designed to comply with 2016 Title 24 requirements. The built-in motion sensors at exterior lighting fixtures would automatically dim down lights to minimum security levels. Occupancy and daylight sensors would be used to control the lighting system in classrooms, custodial, unsupervised rooms, corridors and offices. Daylight saving controls would be utilized to dim the lights when there is sufficient daylight. High efficacy fixtures would be installed at building exterior walls to provide site lighting. Outdoor and site lights would be controlled by timers with Astronomical/photo cell timing controls. Lighting control panels per specifications would be installed in each building to control the lighting system in that building.

The proposed Project would be more energy-efficient than the existing conditions and provide opportunities for future energy efficiencies including a photovoltaic panel connection. As the proposed Project would not increase the capacity of the school, no new vehicles trips would be generated during operations, and there would be no increase in major new emission sources during operations.

Therefore, the proposed Project would result in less than significant impacts in relation to energy consumption. No mitigation or further study is required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed Project would result in no impact in relation to conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency, as it has been designed in conformance with applicable State and District Standards.

The proposed Project would replace existing buildings on an elementary school campus with new, more energyefficient modernized buildings. The proposed Project would involve the replacement of 18 less energy-efficient buildings (constructed between 1925 and 1977) with new buildings that would comply with the more energyefficient provisions of the current California Building Standards Code (Title 24, California Code of Regulations [CCR]), SC-GHG-5, CHPS criteria, and applicable California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) mandatory measures.⁸⁰ Implementation of SC-GHG-5 would be required.

The proposed Project would comply with Sections 110.10(b) through 110.10(d) of the California Energy Code, which requires buildings to be solar ready (CCR, Title 24, Part 6).^{81,82} The proposed Project design would be consistent with California Energy Code goals by providing photovoltaic panel connections for future local solar power use, energy-efficient buildings (meeting new code requirements by replacing older buildings), carbon and climate leadership (reduced GHG emissions – see Greenhouse Gas Emissions section of this document), and mobility and transit (Project site is located less than one-half mile from a LA Metro Blue Line station).⁸³ Therefore, the proposed Project would result in no impacts regarding conflicts with or obstructions of a state or local plan for renewable energy or energy efficiency. No mitigation or further study is required.

⁸³ City of Los Angeles April 2015. Sustainable City pLAn. Available at: https://www.dropbox.com/s/e768n31r3k379w7/the-plan.pdf?dl=0



⁸⁰ California Building Standards Commission. Effective January 1, 2017. 2016 California Green Building Standards Code. CALGreen (Part 11 of Title 24). Available at: http://www.bsc.ca.gov/Home/CALGreen.aspx

⁸¹ Los Angeles Housing+Community Investment Department. n.d. Building Codes and Standards. Available at: https://hcidla.lacity.org/Property-Standards Accessed February 13, 2019.

⁸² Los Angeles Municipal Code, Chapter IX, Building Regulations. Article 9, Green Building Code.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)				
ii. Strong seismic ground shaking?			\boxtimes	
iii. Seismic-related ground failure, including liquefaction?			\boxtimes	
iv. Landslides?				\boxtimes
b. Result in substantial soil erosion or the loss of topsoil?			\boxtimes	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			\boxtimes	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				\boxtimes
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			\boxtimes	

Explanation:

The Program EIR contains one SC for minimizing project impacts to geology and soils and one SC for minimizing project impacts to paleontological resources. The SC requiring the preparation of a Geohazard Assessment has been met through the preparation of the Preliminary Geotechnical and Geological Engineering Investigation Report, Ascot Avenue Elementary School Modernization, by Koury Engineering & Testing, Inc. (Appendix F, *Geotechnical Study*). The report contains geotechnical construction recommendations and procedures that must be followed as part of project design. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to geology and soils.

LAUSD Standard Conditions of Approval

SC-GEO-	LAUSD shall prepare a Geohazard Assessment for the construction of any new school or applicable school addition. The
1	Geohazard Assessment shall consist of the following scope of work. This document outlines the procedures and scope for
	geohazard assessments.
SC-CUL-	LAUSD shall retain a Paleontological Monitor to oversee specific ground-disturbing activities as determined by the scope of
11	work and final grading plan. The Monitor shall provide the construction crew(s) with a brief summary of the sensitivity, the

rationale behind the need for protection of these resources, and information on the initial identification of paleontological resources.

If paleontological resources are uncovered, the Construction Contractor shall halt construction activities within a 30 foot radius of the find and shall notify the LAUSD.

- Ground-disturbing activities shall not continue until the discovery has been assessed by the Paleontologist.
- The paleontologist shall have the authority to halt construction activities to allow a reasonable amount of time to identify potential resources.

Significant resources found shall be curated as determined necessary by the Paleontologist.

Given its location in Southern California, the Project site is within a seismically active region as a result of the active margin between the North American and Pacific tectonic plates. The principal source of seismic activity is movement along the northwest-trending regional faults such as the San Andreas, San Jacinto, Newport-Inglewood and Whittier-Elsinore fault zones. The most important fault to the site with regard to seismic shaking is the northwest trending Newport-Inglewood Fault located approximately 5.8 miles southwest of the Project site (see Appendix F). The Project site is not within a State of California Earthquake Fault Zone (CEFZ; formerly Alquist-Priolo Fault Zone) or within a City of Los Angeles Fault Rupture Study Area (FRSA), as identified by the City of Los Angeles General Plan Safety Element.⁸⁴

Liquefaction may occur when saturated, loose to medium dense, cohesionless soils are densified by ground shaking or vibrations. The densification results in increased pore water pressures if the soils are not sufficiently permeable to dissipate these pressures during and immediately following an earthquake. When the pore water pressure is equal to or exceeds the overburden pressure, liquefaction of the affected soil layers occurs. For liquefaction to occur, three conditions are required: ground shaking of sufficient magnitude and duration; groundwater level at or above the level of the susceptible soils during the ground shaking; and soils that are susceptible to liquefaction. The Liquefaction Hazards zone on the State of California Seismic Hazards Zones Map indicates that the site is not located in a liquefaction susceptibility zone. Due to the absence of shallow groundwater, potential for liquefaction is considered remote (see Appendix F).

The site is not located in a Landslide Hazard Zone on the State of California Seismic Hazard Zones Map. No evidence for landslides was observed on or in the immediate vicinity of the site at the time of field exploration. Based on topographic conditions, landslides are not considered a potential hazard at the site (see Appendix F).

The topography of the site is mostly flat and generally slopes gently to the southwest between about elevations 194 and 198 feet above MSL (see Appendix F).

The March 10, 1933 Long Beach earthquake (Newport-Inglewood Fault rupture; earthquake magnitude estimated at 6.4 M_w) damaged 120 schools in the greater Los Angeles region, of which 70 were destroyed.⁸⁵ At Ascot ES, the 1933 earthquake destroyed 40 unreinforced masonry school buildings and required the removal



⁸⁴ City of Los Angeles. 1996. General Plan Safety Element. Exhibit A. Alquist-Priolo Special Studies and Fault Rupture Areas. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

⁸⁵ California Department of Conservation. n.d. The 1933 Long Beach Earthquake. Available at: https://www.conservation.ca.gov/cgs/Pages/Earthquakes/LongBeach.aspx. Accessed 18 January 2019.

of all damaged or "precariously placed" chimneys, parapets, fire walls, and ornamentation on the Project site.⁸⁶ In April 1933, the California State Legislature enacted the Field Act, which authorizes the DSA to review and approve all public school plans and specifications and to furnish general supervision of the construction work, assisted by the California Geological Survey.⁸⁷ Of the buildings on the Project site before the 1933 earthquake, only the portion of existing Building 2 that was constructed in 1925 remains on the Project site. Since the enforcement of the Field Act, no California school has collapsed because of a seismic event, and there has been no loss of life. Since the 1933 earthquake, there have been two earthquakes in Los Angeles County with a magnitude over 6.0 M_w (1971 San Fernando and 1994 Northridge earthquakes), which have not caused substantial damage to the facility from seismic activity. However, multiple buildings on the Project site have been identified as seismically vulnerable and require retrofitting, modernizing, and/or replacement to ensure compliance with DSA requirements. The existing buildings on the Project site were constructed between 1925 and 2004.

The Project site is underlain by young alluvial deposits consisting of unconsolidated floodplain deposits of silt, sand and gravel of Holocene age. Borings conducted in 2017 encountered alluvium materials with similar characteristics, although little gravel was found (see Appendix F).

The Project site is served by a sewer. An existing 25-foot-wide storm drain/sewer easement from the City of Los Angeles exists within the Project site in the vacated portion of 45th Street.

Based on a review of the Program EIR and an updated records search at the Natural History Museum of Los Angeles County, there are no known vertebrate paleontological resources within the proposed Project site. Surface deposits in the entire proposed Project area consist of younger Quaternary Alluvium, derived predominantly as fluvial deposits from the flood plain of the Los Angeles River that currently flows in a concrete channel just to the east. These younger Quaternary deposits typically do not contain significant fossil vertebrates, at least in the uppermost layers and have a low potential to yield resources.

- a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

Less than Significant Impact. The proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Although the Project site is subject to seismic movement, comparable to other locations in California, the Project site is not located in a CEFZ and would not exacerbate the potential for seismic activity. The most important fault to the site with regard to seismic shaking is the northwest trending Newport-Inglewood Fault located approximately 5.8 miles southwest of the proposed Project site. However, the proposed Project is not located within a CEFZ or within an FRSA, as identified by the

⁸⁶ LAUSD. 2014. LAUSD Historic Context Statement, 1870-1969. Prepared by Sapphos Environmental, Inc.

⁸⁷ California Department of Conservation. n.d. The 1933 Long Beach Earthquake. Available at:

https://www.conservation.ca.gov/cgs/Pages/Earthquakes/LongBeach.aspx. Accessed 18 January 2019.

City of Los Angeles General Plan Safety Element. The Preliminary Geotechnical and Geological Engineering Investigation Report includes geotechnical recommendations for construction to avoid impacts from seismic shaking. The geotechnical recommendations in this report are required to be followed to avoid impacts from seismic ground shaking (see Appendix F). Therefore, the proposed Project would result in less than significant impacts in regard to rupture of a known earthquake fault, as delineated on the most recent CEFZ (formerly Alquist-Priolo Earthquake Fault) Zoning Map. No mitigation or further study is required.

ii. Strong seismic ground shaking?

Less than Significant Impact. The proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Although the Project site, like the majority of California, is subject to risk of seismic ground-shaking, the proposed Project would not exacerbate the probability of ground shaking. Ground shaking caused by events on distant or nearby active faults is considered a potential seismic hazard at the site the Preliminary Geotechnical and Geological Engineering Investigation Report includes geotechnical recommendations for construction to avoid impacts from seismic shaking. One of the primary objectives of the proposed Project is to ensure that buildings that have been identified as requiring seismic upgrades are addressed. The recommendations in this report are required to be followed to avoid impacts from seismic ground shaking (see Appendix F). Additionally, all buildings would be designed and constructed in accordance with Title 24 of the California Building Standards Code. Therefore, the proposed Project would result in less than significant impacts in regard to the exposure of people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. No mitigation or further study is required.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. The proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. The proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Due to the absence of shallow groundwater, the potential for liquefaction is considered remote (see Appendix F). Therefore, risks from the exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction would be less than significant. No mitigation or further study is required.

iv Landslides?

No Impact. The proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. The proposed Project would not expose people or structures to the risk of loss, injury, or death involving landslides. No evidence for landslides was observed on or in the immediate vicinity of the site at the time of field exploration. Based on topographic conditions, landslides arenot considered a potential hazard at the site (see Appendix F).



As a result, there would be no impact in regard to the exposure of people or structures to the risk of loss, injury, or death involving landslides. No mitigation or further study is required.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to substantial soil erosion or the loss of topsoil. As a result, the relatively flat nature of the proposed Project site precludes it from being susceptible to erosion. However, construction of the proposed Project would result in ground surface disruption during excavation, grading, and trenching that would create the potential for erosion to occur.⁸⁸ As the proposed Project is greater than one acre, the LAUSD's construction contractor would be required to prepare and comply with a Stormwater Pollution Prevention Plan (SWPPP), which would include standard erosion control measures.⁸⁹ In addition, the LAUSD's construction contractor would be required to comply with the Stormwater Construction Activities General Permit and obtain a National Pollutant Discharge Elimination System (NPDES) permit.⁹⁰ Compliance with the above regulations, plans, and standards would reduce all impacts due to soil erosion to below the level of significance. No mitigation or further study is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. The proposed Project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Test borings performed by Koury Engineering & Testing, Inc. indicate that the subsurface soil profile of the Project site consists of fill underlain by alluvial deposits (see Appendix F). The fill depth was found to range between about 2.5 and 7 feet at the boring locations. The fill soils on the site generally consist of loose to medium dense silty sand. Strata of clayey sand and sandy clay were encountered in Boring B-3. Minor amounts of construction debris were encountered in some borings. The underlying alluvium consists predominantly of alternating layers of silty sand, poorly graded sand with silt and sandy silt. Localized strata of sandy clay, clayey sand and poorly graded sand layers were also encountered. Soils prone to collapse are generally young and deposited by flash floods and wind. Laboratory tests generally indicated slight collapse (<0.5 percent) except for a sample from Boring B-12 at a depth of 6 feet, which indicated 1.7 percent collapse (see Appendix F).

Consistent with SC-GEO-1, a detailed Project-specific geotechnical investigation has been prepared by Koury Engineering & Testing, Inc., a Registered Geologist, to confirm the potential liquefaction-related hazards and design standards pursuant to Title 24 of the California Building Standards Code and other regulations, plans

⁸⁸ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

⁸⁹ Clean Water Act, Section 402.

⁹⁰ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

and standards set forth in the Program EIR.^{91,92,93,94} Incorporation of the recommendations of the geotechnical investigation into the design of the school will ensure that any potential damage as a result of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be reduced to below the level of significance. Therefore, the proposed Project would result in less than significant impacts in regard to being located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. No mitigation or further study is required.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. The shallow subsurface soils encountered on the Project site consist mostly of silty sand. These types of material generally have a low susceptibility to expansion when facing seasonal cycles of saturation/desiccation. Expansive soil is defined as soil that expands to a significant degree upon wetting and shrinks upon drying. Generally, expansive soils contain a high percentage of clay particles. As required for all new schools, in accordance with the California Education Code, a geotechnical analysis and site-specific investigation has been performed by Koury Engineering & Testing, Inc., a registered geologist, to evaluate the potential for expansive soil on the Project site. The consolidation tests performed by Koury Engineering & Testing, Inc. did not experience swelling upon addition of water. However, the geotechnical investigation did recommend that localized clay soils encountered during grading should not be placed below buildings and other structures (see Appendix F). Incorporation of the recommendations of the geotechnical investigation and the requirements of Title 24 of the California Building Standards Code would reduce impacts to below the level of significance. No mitigation or further study is required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. The proposed Project would result in no impact in regard to having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The proposed Project would connect to a municipal sewer system and would not use septic tanks or alternative wastewater systems. No mitigation or further study is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. Implementation of the proposed Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. A records search by the Natural History Museum of Los Angeles County did not identify any known vertebrate paleontological resources within



⁹¹ California Geological Survey. n.d. Department of Mines and Geology. Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California.

⁹² California Building Standards Code, California Code of Regulations Title 24.

⁹³ California Education Code Section 17212.

⁹⁴ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

the proposed Project site. While it is thus unlikely that vertebrate paleontological resources are present on the proposed Project site, it is possible that construction activity could unearth such resources. LAUSD will implement SC-CUL-11, which ensures that if paleontological resources are discovered during construction, they will be evaluated and appropriately treated. Therefore, impacts would be less than significant. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			\boxtimes	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			\boxtimes	

Explanation:

LAUSD has SCs for minimizing impacts to greenhouse gas (GHG) emissions. Applicable SCs related to GHG emissions impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval		
SC-GHG- 1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.	
SC-GHG- 2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.	
SC-GHG- 3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.	
SC-GHG- 4	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.	
SC-GHG- 5	LAUSD shall ensure that the designed time dependent valued energy shall be at least 10%, with a goal of 20% less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.	
SC-USS- 1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:	
	School Design Guide.	
	Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.	
	Construction & Demolition Waste Management. This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.	

Operational GHG emissions from land use projects such as schools primarily result from direct and indirect use of energy for transportation, water use and building heating and cooling. With respect to SUP modernization projects, the Program EIR states that operational activities would be less than significant, because these projects would not increase capacity of existing schools and net project emissions would be minimal. Additionally, overall District enrollment is forecast to decrease over the next 10 years, and operational emissions are not expected to increase in the long term. Further, projects implemented under the SUP are anticipated to have less than significant and potentially significant impacts related to climate change within the LAUSD service area with the incorporation of SCs. The Project-specific analysis provided below determined



that implementation of the proposed Project would have less than significant impacts related to climate change with the incorporation of SCs.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact. The construction of the Project will generate short term greenhouse gas emissions during construction that will be below significance levels. The Project would result in a modernized facility with energy and water efficiencies that will reduce per square foot and per capita emissions over the operational life of the facility, such that there would be no net direct or indirect generation of greenhouse gas emissions and impacts would be less than significant. Because GHG emissions are evaluated in a global or sometimes regional context, the Project-related climate change impacts are inherently cumulative. Section 5.7.1.1 of the Program EIR contains a summary of national and state laws, regulations, plans and guidelines relevant for analyzing the impacts of GHG emissions from SUP projects. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of Assembly Bill (AB) 32. In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the SCAG region, the SCS was adopted in April 2016. On April 29, 2015, Governor Brown signed Executive Order B-30-15, which sets a California GHG reduction target of 40 percent below 1990 levels by 2030. In August 2016, SB 32 was passed and requires the state to reduce its GHG emissions 40 percent below 1990 levels by 2030. The 2017 Climate Change Scoping Plan Update⁹⁵ establishes a framework for California to reduce GHGs by 40 percent by 2030 compared to 1990 levels.

Regionally, the goals from the 2016 AQMP,⁹⁶ Air Quality Element of the City's General Plan⁹⁷ serve to reduce GHG emissions. The City released its climate action plan, Green LA,⁹⁸ in May 2007. The plan sets forth a goal of reducing the City's GHG emissions to 35 percent below 1990 levels by the year 2030, one of the most aggressive goals of any big city in the U.S. On April 8, 2015, Mayor Eric Garcetti released L.A.'s first-ever Sustainable City pLAn.⁹⁹ The proposed Project would be consistent with pLAn strategies to achieve the GHG target reductions primarily through the design of modern efficient buildings.

⁹⁵ California Air Resources Board. 20 January 2017. The 2017 Climate Change Scoping Plan Update. Available at: https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf

⁹⁶ South Coast Air Quality Management District. 2016. Air Quality Management Plan. Available at: http://www.aqmd.gov/home/airquality/clean-air-plans/air-quality-mgt-plan

⁹⁷ City of Los Angeles. n.d. City of Los Angeles General Plan. Available at: https://planning.lacity.org/GP_elements.html

⁹⁸ Villaraigosa, Antonio R. May 2007. Green LA: An Action Plan to Lead the Nation in Fighting Global Warming. City of Los Angeles. Available at: http://environmentla.com/pdf/GreenLA_CAP_2007.pdf

⁹⁹ City of Los Angeles. 2015. City of Los Angeles Plan. Transforming Los Angeles. Available: http://plan.lamayor.org/

Construction Phase:

As discussed under Air Quality, above, a reasonable "worst-case" scenario for the construction phase, 21month per phase over two phases, was developed. GHG emissions for each construction year were estimated with the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. Construction emission results, based on the annual emissions output from CalEEMod (Table 9, *Construction GHG Emissions, MT CO2e Per Year*). The CalEEMod calculated emissions are based on a 21-month construction schedule, which was then doubled to represent the total 42-month schedule over both phases. The amortized annual GHG emissions are 92 metric tons of CO₂ equivalent (CO₂e) per year, which are below the SCAQMD threshold of 3,000 metric tons per year of CO₂e.

CONSTRUCTION GHG EMISSIONS, MT CO2E PER YEAR				
Construction Year	2021	2022	2023	Total
Construction Annual Emissions, Phase 1	452	497	436	1,385
Construction Annual Emissions, Both Phases	904	994	872	2,770
Amortized Annual Emissions (over 30 years)	92			
SCAQMD Threshold	3,000			
Exceeds Threshold?	No			

TABLE 9

Operation Phase:

Given that school enrollment is projected to remain the same with the Project and that SC-GHG-1 through SC-GHG-5 and SC-USS-1 (establishing recycling practices that would encourage sustainability practices and reduces energy usage and GHG) would be incorporated and the more energy and water efficient buildings would reduce annual per square foot and per capita emissions, the net change in operational emissions would not exceed the SCAQMD's significance threshold of 3,000 metric tons per year of CO₂e. Therefore, GHG emissions would be less than significant. No mitigation or further study is required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. As described in the Program EIR, the Project, as a component of implementation of the SUP, would be consistent with plans adopted for the purpose of reducing GHG emissions, such as the SCAG RTP/SCS, California AB 32, CARB Scoping Plan, and other Statewide strategies to reduce GHG emissions. Development of the proposed Project would replace and modernize facilities at Ascot ES, but it would not increase the number of students or faculty at the school and, therefore, would not result in an increase in vehicle trips to the school. As such, GHG emissions related to vehicle trips would not increase as a result of the proposed Project would not conflict with the goals of the RTP/SCS.

Additionally, SUP-related projects, including the proposed Project, would comply with the District's GHG emission reduction measures. LAUSD's School Design Guide requires construction contractors to reuse, recycle, and salvage non-hazardous materials generated during demolition and/or new construction, as materials recovery would minimize the need to produce and transport new materials, thereby reducing



emissions from mobile sources and energy use. With respect to all SUP projects, implementation of SCs GHG-1 through GHG-5 and SC-USS-1 would ensure that the proposed Project would not conflict with applicable plans, policies or regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts would be less than significant. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the proje	ect:			
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			\boxtimes	
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?			\boxtimes	
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			\boxtimes	
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				\boxtimes
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				\boxtimes
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			\boxtimes	
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				\square

Explanation:

The Program EIR contains five SCs for minimizing project impacts to hazards and hazardous materials. Applicable SCs related to potential impacts associated with the proposed Project are included. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to hazards and hazardous materials.

LAUSD Standard Conditions of Approval

SC-HAZ-	The Construction Contractor shall comply with the following OEHS Site Assessment practices and requirements (as
4	applicable):
	 District Specification Section 01 4524, Environmental Import / Export Materials Testing
	Removal Action Workplan or Remedial Activities Workplan
	California Air Resources Board Rule 1466
	 Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials - particularly applicable to buildings that were constructed or remodeled between 1959 and 1979
	 Lead and asbestos abatement requirements identified by the Facilities Environmental Technical Unit (FETU) in the Phase I/Phase II, or abatement plan(s)
SC-PS-2	LAUSD shall implement emergency preparedness and response procedures in all schools as required in LAUSD
	References, Bulletins, Safety Notes, and Emergency Preparedness Plans.



The Project site is an existing elementary school. A Phase I Environmental Site Assessment (ESA) Report was prepared for the Project site (APN 5107-005-909) in 2017 that found on-site listings consistent and typical of a school (see Appendix G, Phase I Environmental Site Assessment). According to the Phase I ESA, Ascot ES was listed in the following environmental databases: HAZNET, FTTS, RCRA, SCH, FINDS, and ECHO. The Phase I ESA Report, as well as the California Department of Toxic Substances Control (DTSC) EnviroStor database and the California State Water Resources Control Board GeoTracker database, shows that the proposed Project site is not listed as a hazardous waste site.^{100,101} No violations were noted, and no additional offsite listings were considered an environmental concern to the Project site. The EDR environmental database search report also noted several off-site properties of potential concern; however, based on case status and/or distance and direction from the site, these listings were not considered an environmental concern to the site. For the Phase I ESA, requests to review file documents were submitted to the Los Angeles County Department of Public Health, LARWQCB, Los Angeles County Fire Department (LACFD), SCAQMD, and the DTSC. The Los Angeles County Department of Public Health, LARWQCB, LACFD, and DTSC Cypress reported that they had no files pertaining to the site address. No records indicating the presence of any environmental conditions were provided by SCAQMD. A historic Phase I ESA (2000) and various correspondence regarding environmental investigations related to the construction of the newest classroom building in the northeast corner of the Site, including a Report of Completion, were reviewed at the DTSC Chatsworth office. No recognized environmental conditions (RECs) were identified in the 2000 Phase I ESA, and a "no action" determination was issued by the DTSC on April 21, 2001.102

The 2017 Phase I ESA (Appendix G) revealed evidence of one REC at the Project site: based on the age of the Project site buildings, exterior soils may be impacted with lead due to the weathering of lead-based paint and with arsenic and/or organochlorine pesticides as a result of possible pesticide applications at the property. In addition to surficial applications, organochlorine pesticides may be found at depth as a result of treatment or injection beneath buildings as a termiticide.

One data gap was identified in the preparation of the 2017 Phase I ESA: a soil boring location, labelled "B-2," was observed along the northern boundary of the Project site. No reference to historic subsurface investigations, inclusive of this boring location, was found in review of historical sources. The deficiency of information regarding this boring location, and any associated subsurface activity, is considered a data gap.

A PEA-E was conducted at the site in 2018 and 2019 by Wayne Perry, Inc. (see Appendix B). Field sampling and analysis was conducted to determine whether historical uses have resulted in hazardous substances at the Project site as part of the PEA-E. In addition, the soil investigation was conducted to determine if the restriction of South Coast Air Quality Management District (SCAQMD) Rule 1466 *Control of Particulate Emissions from Soils with Toxic Air Contaminants.* The results of the laboratory analysis showed levels of lead concentration were above residential screening thresholds. The PEA-E describes the contamination, excavation dimensions, methodology, transportation and disposal, confirmation sampling plan, methods to ensure worker and public

¹⁰⁰ California Department of Toxic Substances Control. n.d. EnviroStor: 1447 E. 45th Street, Los Angeles, CA 90011. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=15280011. Accessed 17 January 2019.

¹⁰¹ California State Water Resources Control Board. n.d. Geo'Tracker: 1447 E. 45th Street, Los Angeles, CA 90011. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=1447+e+45th+street+los+angeles. Accessed 17 January 2019.

¹⁰² California Department of Toxic Substances Control. n.d. EnviroStor: Ascot Avenue ES Addition (19820041). Available at: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=19820041. Accessed 17 January 2019.

health safety, and cleanup goals, has been prepared. The contaminated soils would be removed prior to construction of each phase with methods intended to reduce dust emissions. In addition, the contaminated soil will be removed when no students or staff are present to satisfy Rule 1466. All cleanup activities under the PEA-E would adhere to applicable state and local policies and regulations regarding excavation, removal, and disposal of affected materials. The volume of impacted soil that is addressed by the soil removal action is estimated to be less than 2, 000 cubic yards (cy).

According to Exhibit H, *Critical Facilities & Lifeline Systems*, of the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a City-selected disaster route or highway.¹⁰³ The nearest City-selected disaster route to the Project site is Alameda Street, located approximately 0.5 mile east of the Project site. Ascot ES has a Safe School Plan that identifies two emergency assembly areas on-site a primary and a secondary evacuation route.¹⁰⁴ The primary evacuation route is from the eastern edge of the campus south on Compton Avenue for less than two blocks, then east on E 46th Street for one block to the parking lot on the northern side of Fred Roberts Recreation Center. The secondary evacuation route is from the eastern edge of the campus of the campus north on Compton Avenue for just over five blocks to Ross Snyder Recreation Area at E 41st Street.

The Project site is not located within 500 feet of existing high voltage lines or cell towers.¹⁰⁵ Overhead electrical distribution lines (110–161 kilovolt) operated by Southern California Edison are located approximately 20 feet south and 9 feet west of the Project site, on the opposite side of the alley and on the sidewalk along Ascot Avenue.¹⁰⁶ The Metro Blue Line is located less than 1,500 feet east of the Project site. The Alameda Corridor, a 20-mile railroad express line that connects the port of Long Beach and Los Angeles to the transcontinental rail network east of downtown Los Angeles, is located 0.5 mile (2,600 feet) to the west of the Project site. According to the Southern California Gas Company's website, SoCalGas owned or operated high-pressure distribution lines are located immediately west of the Project site, below Ascot Avenue.¹⁰⁷ According to the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a wildfire hazard zone or urban fire and secondary hazard zone.¹⁰⁸

a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to the routine transport, use, or disposal of hazardous materials. Construction of the proposed Project would

¹⁰³ Los Angeles Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Exhibit H. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

¹⁰⁴ LAUSD School Operations – Emergency Services. September 12, 2016. Safe School Plan: Volume 2 – Emergency Procedures. Quick Reference Guide. Ascot Elementary. Available at: http://ascotavees-lausdca.schoolloop.com/file/1413464101506/4228615928749044812.pdf

¹⁰⁵ City of Los Angeles. February 3, 2016. Cellular Towers. Available at: http://geohub.lacity.org/datasets/f2e52f0183794e0089dbb3105f151202_24?geometry=-137.73%2C31.499%2C-95.916%2C37.818

¹⁰⁶ California Energy Commission. 2016. Local Reliability Areas with Transmission Lines and Substations for 2016. Enlargement Area: Los Angeles. Available at: https://www.energy.ca.gov/maps/

¹⁰⁷ Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at: http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335. Accessed 15 January 2019.

¹⁰⁸ City of Los Angeles. 1996. General Plan Safety Element. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

involve very little transport, storage, use, or disposal of hazardous materials. All hazardous materials generated from demolition would be stored, handled, and disposed of in accordance with local, county, and state laws that protect public safety. Some examples of hazardous materials currently present on the property (and would be used in the construction phase) are PCBs (polychlorinated biphenyls), asbestos, and paints (see Appendix G). These types of materials, however, are not acutely hazardous, and all storage, handling, and disposal of these materials is regulated by the DTSC, the EPA, the Occupational Safety & Health Administration (OSHA), and the LAFD.

As previously discussed, as a part of the construction activities, LAUSD would implement a removal action for the proposed Project. Less than approximately 2,000 cubic yards of soil containing contaminants of concern (COCs), specifically lead, at levels that exceed the LAUSD's cleanup goals would be removed from areas located throughout the Project site. During all excavation activities, SCAQMD Rule 1466 mitigation activities would be implemented to ensure public safety.

Implementation of the removal action would entail excavation and off-site removal as a part of the proposed Project. The excavation would be performed using heavy equipment consisting of, but not limited to, an excavator, backhoe, loader, and dump truck. Ancillary facilities (i.e., wastewater holding tank) would also be used during the removal action. Excavation operations may generate fugitive dust emissions. Suppressant foam, water spray, and other forms of vapor and dust control may be required during excavation, and workers may be required to use personal protective equipment to reduce exposure to the COCs. The depth of excavations may be limited due to physical constraints associated with the site. Sloping excavation sidewalls and slot-cutting may result in increased volume of soil requiring excavation. Confirmation soil sampling and analysis would be conducted to verify soil impact concentrations at the excavation bottom and each sidewall.

As detailed above, excavated soil would be either directly-loaded into waiting dump trucks or temporarily stockpiled within an on-site "holding area" using a rubber-tire backhoe or similar equipment (such as wheel loader). Any temporary soil stockpiles would be properly secured and protected from water infiltration using drop clothes underneath and over the stockpiles until ready for loading for off-site transportation and disposal to an appropriate facility. Truck loading would take place concurrently with excavation operations associated with the Project. Clean, imported soil or other fill material would be brought to the site to backfill areas where impacted soil was removed. Imported soil and/or other fill material would be accompanied by certificates, analytical data, and/or other supporting documents that indicate the import material is in conformance with cleanup criteria.

Any soil that is imported or exported must be chemically tested in accordance with specific written procedures as outlined in LAUSD Specifications, Section 01 4524, Environmental Import/Export Materials Testing. This specification has the requirements for the sampling, testing, transportation, and certification of imported fill materials or exported fill materials from school sites. Remediation and verification testing/monitoring would be required before CDE approval of the Project for state funding under California Education Code Sections 17210.1, 17213.1, and 17213.2.

Based on the foregoing, implementation of the proposed removal action and modernization Project will be closely monitored and will occur in accordance with local, state and federal requirements. The proposed modernization would not subject people to substantial hazards from lead, arsenic, or petroleum hydrocarbons.

Therefore, impacts related to the transport, use, or disposal of hazardous materials would be less than significant.

Operation

The proposed Project is an educational facility and would not involve the routine transport, storage, production, use, or disposal of hazardous materials or use of pressurized tanks during operation. Small amounts of pesticides may be stored for the maintenance of landscaped areas and limited quantities of custodial and maintenance products, including commercial cleansers, lubricants, and paints would also be stored on-site.

The design and operation of the proposed Project would satisfy all legal requirements by providing for and maintaining appropriate storage areas for hazardous materials, installing or affixing appropriate easily visible and legible warning signs and labels, using commercial services that specialize in the recycling of used hazardous substances (i.e., collecting hazardous materials on a regular basis to minimize the quantity stored on campus), installing emergency wash areas for flushing irritating substances from eyes and exposed skin areas should such contact occur, providing well-ventilated areas in which to use paints and solvents, and maintaining adult supervision during student's use of hazardous materials. All hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Any associated risk would be adequately reduced to a less than significant level through compliance with these standards and regulations, and through rigorous adherence to standard operating procedures (SOPs) would not pose significant hazards to the public or the environment. Therefore, operational impacts related to the transport, use, or disposal of hazardous materials use would be less than significant. No mitigation or further study is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. According to the Phase I ESA, Ascot ES was listed in the following environmental databases: HAZNET, FTTS, RCRA, SCH, FINDS, and ECHO. All databases found no violations. In addition, no additional off-site listings were considered an environmental concern (see Appendix G). Therefore, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. No mitigation or further study is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to the emission of hazards or handle hazardous or acutely hazardous materials, substances, or waste within onequarter mile of an existing or proposed school. During the construction phase, it is possible children could come in contact with PCBs, asbestos, paints, or petroleum products (see Appendix G). However, SC-HAZ-04 would ensure that the following guidelines are followed: District Specification Section 01 4524, Environmental Import / Export Materials Testing; Removal Action Workplan; California Air Resources Board Rule 1466



Guidelines and Procedures to Address Polychlorinated Biphenyls (PCBs) in Building Materials, particularly applicable to buildings that were constructed or remodeled between 1959 and 1979; lead and asbestos abatement requirements identified by the FETU in the Phase I/Phase II; or abatement plan(s). With implementation of SCs, the proposed Project would have less than significant impacts regarding the emission of hazards or handle hazardous or acutely hazardous materials substances or waste within one quarter mile of an existing or proposed school. No mitigation or further study is required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The proposed Project would result in no impact in regard to creating a significant hazard to the public or the environment due to location on a listed hazardous materials site. The proposed Project is not located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The Phase I ESA Report shows that the proposed Project site is not listed as a hazardous waste site (see Appendix G). Therefore, there would be no impact. No mitigation or further study is required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The proposed Project would not be located within an airport land use plan or, where such a plan has not been adopted, within two nautical miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the Project area. The nearest public airport to the proposed Project is the Los Angeles International Airport (LAX), located approximately 15 miles southwest of the proposed Project site. No mitigation or further study is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The proposed Project would result in less than significant impacts in regard to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan. The SUP does not allow any uses or design features that would impair implementation of or interfere with an adopted emergency response plan or emergency evacuation plan. The Project site is an active elementary school campus with an existing Safe School Plan that designates evacuation routes north and sound along Compton Avenue to Fred Roberts Recreation Center and Ross Snyder Recreation Area. Although the administration building would be installed at another location on the Project site, the City's selected disaster routes and the two school designated evacuation routes would not be altered as a result of the proposed Project. During construction, a Construction Worksite Traffic Control Plan would be required (SC-T-4) to maintain applicable transportation related safety measures as required by local and state agencies (see Section XVIII, *Transportation and Circulation*). Additionally, SC-PS-2 would be implemented during operation to maintain emergency preparedness and response procedures at Ascot ES (see Section XIV, *Pedestrian Safety*). During operation, the proposed Project would shift peak traffic during student drop-off from E 45th Street at Compton Avenue on the east side of the Project site to Ascot Avenue on the west side of the Project site as an indirect effect of relocating the main administration building towards the western side of the elementary school

campus. The shift in peak traffic would reduce potential conflicts with evacuation routes that are currently located east of the Project site. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. No mitigation or further study is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. According to the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a wildfire hazard zone, or urban fire and secondary hazard zone. Furthermore, the Project site is located in a heavily urbanized area away from dense vegetation. Moreover, the local fire code and Title 5 requires the proposed Project to comply with these regulations. Therefore, the proposed Project would not expose people or structures to a risk of loss, injury, or death involving wildland fires. Therefore, there would be no impact. No mitigation or further study is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?				\square
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				\boxtimes
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;				\boxtimes
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				\boxtimes
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				\boxtimes
iv) Impede or redirect flood flows?				\boxtimes
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				\boxtimes
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				

Explanation:

The Program EIR contains six SCs for minimizing Project impacts to hydrology and water quality, three of which are applicable to the proposed Project. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to hydrology and water quality.

LAUSD	Standard Conditions of Approval
SC- HWQ-1	LAUSD shall design and construct the project to meet or exceed the current and applicable stormwater guidelines.
	Stormwater Technical Manual
	This manual establishes design requirements and provides guidance for the cost-effective improvement of water quality in new and significantly redeveloped LAUSD school sites. These guidelines are intended to improve water quality and mitigate potential impacts to the Maximum Extent Practicable (MEP). While these guidelines meet current post-construction Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. The guidelines address the mandated post-construction element of the NPDES program requirements.

SC- HWQ-2	LAUSD shall implement the applicable stormwater requirements during construction activities.
	Compliance Checklist for Storm Water Requirements at Construction Sites
_	This checklist has requirements for compliance with the General Construction Activity Permit and is used by OEHS to evaluate permit compliance. Requirements listed include a SWPPP; BMPs for minimizing storm water pollution to be specified in a SWPPP; and monitoring storm water discharges to ensure that sedimentation of downstream waters remains within regulatory limits.
SC-	LAUSD shall implement the following programs and procedures, as applicable:
HWQ-3	Environmental Training Curriculum – a qualified environmental Monitor shall provide a worker's environmental awareness program that is prepared by LAUSD for the project.
	Hazardous Waste Management Program (Environmental Compliance/Hazardous Waste)
	Medical Waste Management Program
	Environmental Compliance Inspections
	Safe School Inspection Program
	Integrated Pest Management Program
	Fats Oil and Grease Management Program
	Solid Waste Management Program
	Other related programs overseen by OEHS

The proposed Project site is 5.3 acres. Of this area, 5.1 acres consist of hardscape/impervious area and 0.2 acre of pervious areas. The school's highest point is in the middle, and it slopes down in all directions at a rate of 1 percent. Ascot ES has a 25-foot storm drain located within the Project site. In addition, Ascot ES has four curb drains and two parkway drains that serve the campus. A 51-inch RCP LA Country Storm Drain Line runs through the middle of the site. The site has a cold water Supply of 686 Fixture Units (FUs). Each building has a cold water pipe between 1 inch and 2.5 inches. The site has a drainage fixture total of 590 FU. According to the Los Angeles Department of Public Works, the site is not built on top of a groundwater well.¹⁰⁹ Furthermore, the Project site does not contain any natural drainages or water courses, which would potentially support riparian habitat, or natural undeveloped areas that may contain any other sensitive natural community. According to the Phase I ESA (Appendix G), EnSafe submitted a request to the LARWQCB and there were no pending violations found. The proposed Project is not in a 100-year flood hazard area.¹¹⁰ The proposed location is not at risk for inundation by seiche, tsunami, or mudflow. The nearest surface water body is the Los Angeles River, located approximately 1.71 miles northeast of the proposed Project site, approximately 196 feet and 12 miles from the coastline (Appendix G). According to the Los Angeles Department of City Planning Zone Information and Map Access System map, the proposed Project site is not located in an area at risk for landslide activity.¹¹¹ The Project is located 9.82 miles east of the tsunami zone mapped along the west coast of the City of Los Angeles.¹¹² According to the City of Los Angeles General Plan, the Project site is not located in an area at risk for mudflows. The Project site is roughly 2.5 miles from the 100-Year Flood Plain Area.¹¹³

http://geohub.lacity.org/datasets/ffaf33ba67264818a729dc97a384c064_6. Accessed January 24, 2019. ¹¹³ Ibid.



¹⁰⁹ Los Angeles County Department of Public Works. n.d. Los Angeles Ground Water Wells. Available at: http://dpw.lacounty.gov/general/wells/. Accessed January 24, 2019.

¹¹⁰ ZIMAS. n.d. Available at: zimas.lacity.org/. Accessed January 24, 2019.

¹¹¹ Ibid.

¹¹² City of Los Angeles. n.d. Tsunami Inundation Zones. Available at:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

No Impact. Implementation of the proposed Project would not violate any water quality standards and waste discharge requirements. The Project would not substantially degrade surface or groundwater quality. During any construction activities, any wastewater produced would be disposed of in accordance with applicable regulations and would not violate Part 40, Section 122.41(m) of the Code of Federal Regulations. In addition, the proposed Project involves the construction and operation of the modernization of an existing elementary school on a parcel of at least one acre. As stated in SC-HWQ-2, the proposed Project would comply with the "Storm Water Requirements at Construction Sites Check List." Part of this checklist includes creating a site-specific Storm Water Pollution Prevention Plan (SWPPP). Along with the SWPPP, the checklist requires that BMPs be implemented to ensure sedimentation and downstream waters remain within regulatory limits. According to the Phase I ESA, EnSafe submitted a request to the LARWQCB, and there were no pending violations found. The proposed Project would not violate any water quality standards or waste discharge requirements. Lastly, the Project would not cause an increase in impervious surface area. According to the site plans, none of the new buildings will be built on existing pervious surfaces. Therefore, there would be no impact. No mitigation or further study is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. Implementation of the proposed Project would not deplete groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. During the construction phase of the Project, the pervious area of the Project would temporarily increase, which would result in an increase of groundwater supplies. However, the proposed Project would continue to include grass playfields, which would provide for the percolation of rainwater to groundwater. The proposed Project would not change the amount of pervious and impervious surfaces. The Project does not use groundwater; nor is it built on an existing groundwater well.¹¹⁴ The Project site is currently served by domestic water supply and will be continued to be for the duration of the Project, so the proposed Project would not deplete groundwater levels or interfere with normal groundwater recharge rates. Therefore, there would be no impacts related to depletion of groundwater supplies or interference with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. No mitigation or further study is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or offsite erosion or siltation;

No Impact. The proposed Project would not substantially alter the existing drainage pattern of the site or area. According to the USGS 7.5-minute quadrangle map, the National Wetlands Inventory, and a site

¹¹⁴ Los Angeles County Department of Public Works. n.d. Los Angeles Ground Water Wells. Available at: http://dpw.lacounty.gov/general/wells/. Accessed January 24, 2019.

reconnaissance, there are no streams or rivers located at or within close proximity to the proposed Project location. LAUSD will be in compliance with applicable regulations (SC-HWQ-1). LAUSD would incorporate CHPS and LAUSD BMPs to the extent feasible.¹¹⁵ The proposed Project would not result in any significant erosion or siltation on-or off-site. The Project would control erosion and siltation with the implementation of a site specific SWPPP and an erosion and sediment control plan (ESCP) that is part of the SWPPP. Additionally, regulations as part of SC-HWQ-02 would require the manager to implement BMPs in order to minimize erosion, sedimentation, and siltation. Therefore, the proposed Project would not result in substantial erosion or siltation on-or off-site. No mitigation or further study is required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

No Impact. The proposed Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. Currently the site is sloped to the southwest and has an elevation that ranges from 198 to 194 feet above mean sea level. Surficial water drains as sheet flow to the south and west part of the site toward a lawn/turf area in the southwest area of the site (see Appendix F). The LAUSD would comply with City and County ordinances regulating drainage improvements and grading plans as they relate to construction of on-site improvements that affect drainage.¹¹⁶ Compliance with the preceding ordinances will ensure that the proposed Project would not adversely affect the local drainage system in a manner that would result in substantial flooding on or off site. In addition, the LAUSD would incorporate CHPS standards and LAUSD BMPs to the extent feasible.¹¹⁷ Therefore, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. No mitigation or further study is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

No Impact. The proposed Project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impervious surfaces such as buildings and parking lots can increase runoff rates through impeding infiltration of rainfall and increasing overland flow velocities. The site currently includes both pervious and impervious areas. The site consists of 5.1 acres of hardscape and 0.2 acre of softscape surfaces. The proposed Project would likely increase the coverage of impervious surfaces, although the proposed playfields would provide for percolation of rainwater to groundwater. During the construction phase of the Project, the amount of pervious area would temporarily increase, which would then decrease the amount of runoff. Furthermore, the proposed Project would not generate substantial additional sources of polluted runoff. The LAUSD would incorporate CHPS standards to the extent feasible for this Project.¹¹⁸

¹¹⁵ Collaborative for High Performance Schools (CHPS). n.d. CHPS Criteria. Available at: https://chps.net/chps-criteria. Accessed January 8, 2019.

¹¹⁶ Ibid.

¹¹⁷ Ibid.

¹¹⁸ Ibid.

Stormwater quality would also be addressed through regulatory permit requirements and BMPs. Therefore, there would be no impact. No mitigation or further study is required.

iv) Impede or redirect flood flows?

No Impact. The proposed Project would not impede or redirect flood flows. The proposed Project is not located in a 100-year flood hazard area.¹¹⁹ The nearest surface water body is the Los Angeles River, located approximately 1.71 miles north east of the proposed Project site (Appendix G). Therefore, the proposed Project would not impede or redirect flood flows. No mitigation or further study is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The proposed Project site is not at risk of releasing pollutants due to Project inundation via flood, tsunami, or seiche. The nearest surface water body is the Los Angeles River, located approximately 1.71 miles northeast of the proposed Project site (Appendix G). According to the Los Angeles Department of City Planning Zone Information and Map Access System, the proposed the proposed Project site is not located within an area having the potential for landslide activity.¹²⁰ The Project is located 9.82 miles to the east of the tsunami zone mapped along the west coast of the City of Los Angeles.¹²¹ According to the City of Los Angeles General Plan, the Project site is not located in an area that is at risk for mudflows. Therefore, the proposed Project site is not at risk of releasing pollutants due to Project inundation via flood, tsunami or seiche. No mitigation or further study is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact. The proposed Project would not conflict with or obstruct implementation of any water quality control plans or any sustainable groundwater management plans. The proposed Project will not significantly alter the ratios of impermeable areas to permeable areas. The construction will alter existing structures. No structures will be removed. Additional structures will not be added. Existing permeable areas will not be made impermeable. Existing impermeable areas will not be permanently made permeable. No construction will be performed or alterations made to the subsurface which may impact the groundwater. Therefore, the proposed Project site is not at risk of conflicting with or obstructing implementation of any water quality control plans or any sustainable groundwater management plans. No mitigation or further study is required.

¹¹⁹ ZIMAS. n.d. Available at: zimas.lacity.org/. Accessed January 24, 2019.

¹²⁰ ZIMAS. n.d. Available at: zimas.lacity.org/. Accessed January 24, 2019.

¹²¹ City of Los Angeles. n.d. Tsunami Inundation Zones. Available at: http://geohub.lacity.org/datasets/ffaf33ba67264818a729dc97a384c064_6. Accessed January 24, 2019.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?				\boxtimes
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				\boxtimes

Explanation:

The Program EIR does not include any SCs for minimizing project impacts to land use and planning. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to land use and planning. The Project-specific analysis has determined that implementation of the proposed Project would result in no impacts to land use and planning.

The Ascot ES campus is located at 1447 E 45th Street within the SELA Community Plan Area in the City of Los Angeles (see Figure 1). The proposed Project site is located approximately 1.4 miles south of the Santa Monica Freeway (Interstate 10) and approximately 1.8 miles east of the Harbor Freeway (Interstate 110) and is accessed via E Vernon Avenue near Ascot Avenue or E 45th Street from Compton Avenue. The City of Los Angeles General Plan land use designation for the 5.3-acre Ascot ES campus is "Public Facilities" (see Figure 7). The City of Los Angeles Municipal Code – Zoning Designation for the Ascot ES campus is "Public Facilities – PF" (see Figure 8). Permitted uses in both the general plan land use designation and the zoning code include public elementary schools.¹²²

a) Physically divide an established community?

No Impact. The proposed Project would not divide an established community. The purpose of the proposed Project is to complete a comprehensive modernization of an existing elementary school campus to provide facilities that are safe, secure, and aligned with the instructional program. The new buildings will be structurally similar to those before them and there will be no change to the current land use at the site. The proposed Project would not impede pedestrian or vehicular movement patterns in the vicinity of Ascot ES. Neighborhood schools are generally essential parts of the surrounding communities and, therefore, do not create physical barriers. Therefore, there would be no impact. No mitigation or further study is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. Implementation of the proposed Project would not conflict with an applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Permitted uses



¹²² City of Los Angeles Municipal Code, Chapter 1, Article 2, SEC. 12.08.

in both the general plan land use designation and the zoning code include public elementary schools.¹²³ As allowed per Government Code Section 53094, in 2019 the LAUSD Board of Education adopted a resolution to exempt all LAUSD school sites from local land use regulations.¹²⁴ Therefore, would be no impact. No mitigation or further study is required.

¹²³ City of Los Angeles Municipal Code, Chapter 1, Article 2, SEC. 12.08.

¹²⁴ LAUSD. 2019. Board of Education Report. Report. 18/19 ed. Vol. 256. Los Angeles, CA: LAUSD.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				\boxtimes
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				\boxtimes

Explanation:

The Program EIR does not include any SCs for minimizing project impacts to mineral resources. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to mineral resources within the LAUSD service area. The Project-specific analysis has determined that implementation of the proposed Project would result in no impacts to mineral resources.

The Project site is currently developed as an elementary school. Based on a review of the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) website and the City of Los Angeles General Plan, the Project site is not located on any City-designated oil or gas field.^{125,126} The Project site is zoned for public facilities use, and the Project site has been developed with structures and is inaccessible for mining extraction. Although the Project site is located in an area classified by the California Department of Conservation, Division of Mines and Geology, as a Mineral Resource Zone-2 (MRZ-2), the current land use on the Project site (an existing school) precludes mining. MRZ-2 is defined as "areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence."¹²⁷ Based on a review of the City of Los Angeles General Plan, the Project site is not located on any City-designated oil or gas field.¹²⁸ The Project site is located within the South Central Alcohol Sales Specific Plan area, which does not mention mineral resources.¹²⁹ The SELA Community Plan does not delineate any locally important mineral resource recovery sites within the community plan area.¹³⁰

¹³⁰ Los Angeles Department of City Planning. November 2017. Southeast Los Angeles Community Plan. Available at: https://planning.lacity.org/complan/pdf/selcptxt.pdf



¹²⁵ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. April 16, 2001. District 1 Oil Fields. Available at: ftp://ftp.consrv.ca.gov/pub/oil/maps/dist1/Dist1_fields.pdf

¹²⁶ City of Los Angeles. 1996. Safety Element. Exhibit E. Oil Field & Oil Drilling Areas in the City of Los Angeles. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

¹²⁷ California Department of Conservation, Division of Mines and Geology. 1994. Generalized Mineral Land Classification Map of Los Angeles County – South Half Aggregate Resources Only. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-14/OFR_94-14_Plate1B.pdf

¹²⁸ City of Los Angeles. 1996. Safety Element. Exhibit E. Oil Field & Oil Drilling Areas in the City of Los Angeles. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

¹²⁹ City of Los Angeles. September 13, 2017. Ordinance No. 171,681. South Central Alcohol Sales Specific Plan. A Part of the General Plan – City of Los Angeles. Available at: https://planning.lacity.org/complan/specplan/pdf/AlchSale.pdf

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. The proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The Project site and surrounding area has been previously developed with urban residential, school, and commercial uses. The proposed Project site is zoned for public facilities use, and the Project site has been developed with structures and is inaccessible for mining extraction. The current land use on the Project site (an existing school) precludes mining. The underlying MRZ-2 zone is inaccessible in the existing condition and would continue to be inaccessible after construction of the proposed Project. Therefore, the proposed Project would result in no impacts to mineral resources related to the loss of availability of a known locally important mineral resource recovery site because the resources are unavailable for extraction. No mitigation or further study is required.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. Implementation of the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. As discussed above, the proposed Project site is currently developed, and the existing underlying mineral resources are unavailable for extraction. Therefore, no impact associated with a locally important mineral resource recovery site would occur. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?				
b. Generation of excessive groundborne vibration or groundborne noise levels?		\boxtimes		
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

Explanation:

Entech Consulting Group has prepared a technical noise analysis for the proposed Project (see Appendix H, *Noise and Vibration Technical Memorandum*). LAUSD has nine SCs for minimizing impacts to noise. Projects implemented under the SUP were determined in the Program EIR to result in potentially significant impacts to noise. Applicable SCs related to noise impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval

EAGOD	
SC-N-1	LAUSD shall design new buildings and other noise-generating sources to include features such as sound walls, building configuration, and other design features that attenuates exterior noise levels on a school campus to less than 67 dBA L_{eq} . ¹
SC-N-2	LAUSD shall analyze the acoustical environment of the site (such as traffic) and the characteristics of planned building components (such as Heating, Ventilation, and Air Conditioning [HVAC]), and designs shall achieve interior classroom noise levels of less than 45 dBA Leq with a target of 40 dBA Leq (unoccupied), and a reverberation time of 0.6 seconds. Noise reduction methods shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features. New construction should achieve classroom acoustical quality consistent with the current School Design Guide and CHPS (California High Performance Schools) standard of 45 dBA Leq. New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide and CHPS (California High Performance School Design Guide and CHPS standard of 45 dBA Leq. New HVAC installations should be designed to achieve the lowest possible noise level consistent with the current School Design Guide. HVAC systems shall be designed so that noise from the system does not cause the ambient noise in a classroom to exceed the current School Design Guide and CHPS standard of 45 dBA Leq Modernization of existing facilities and/or HVAC replacement projects should improve the sound performance of the HVAC system over the existing system. The District's purchase of new units should give preference to HVAC manufacturers that sell the lowest noise level units at the lowest cost. Existing HVAC units operating in excess of 45 dBA Leq inside classrooms should be modified.
SC-N-3	LAUSD shall incorporate long-term permanent noise attenuation measures between new playgrounds, stadiums, and other
	noise-generating facilities and adjacent noise-sensitive land uses, to reduce noise levels to meet jurisdictional standards or an increase of 3 dB or less over ambient.
	Operational noise attenuation measures include, but are not limited to:
	buffer zones
	berms
	sound barriers
	buildings
	masonry walls

	enclosed bleacher foot wells
	other site-specific project design features
SC-N-4	LAUSD or its Construction Contractor shall consult and coordinate with the school principal or site administrator, and other nearby noise sensitive land uses prior to construction to schedule high noise or vibration producing activities to minimize disruption. Coordination between the school, nearby land uses and the Construction Contractor shall continue on an as- needed basis throughout the construction phase of the project to reduce school and other noise sensitive land use disruptions.
SC-N-5	LAUSD shall require the Construction Contractor to minimize blasting for all demolition and construction activities, where feasible.
SC-N-8	Projects within 500 feet of a non-LAUSD sensitive receptor, such as a residence, shall be reviewed by OEHS to determin what, if any, feasible project specific noise reduction measures are needed. The Construction Contractor shall implement project specific noise reduction measures identified by OEHS. Noise reduction measures may include, but are not limited to, the following:
	Source Controls
	Time Constraints – prohibiting work during sensitive nighttime hours
	Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential: only between 7:00 AM and 7:00 PM)
	Equipment Restrictions – restricting the type of equipment used
	Substitute Methods – using quieter methods and/or equipment
	Exhaust Mufflers – ensuring equipment have quality mufflers installed
	Lubrication & Maintenance – well maintained equipment is quieter
	Reduced Power Operation – use only necessary size and power
	Limit Equipment On-Site – only have necessary equipment on-site
	Noise Compliance Monitoring – technician on site to ensure compliance Quieter Backup Alarms – manually-adjustable or ambient sensitive types
	Path Controls Noise Barriers – semi-permanent or portable wooden or concrete barriers Noise Curtains – flexible intervening curtain systems hung from supports Enclosures – encasing localized and stationary noise sources Increased Distance – perform noisy activities farther away from receptors, including operation of portable equipment, storage and maintenance of equipment
	Receptor Controls
	Window Treatments – reinforcing the building's noise reduction ability
	Community Participation – open dialog to involve affected residents Noise Complaint Process – ability to log and respond to noise complaints. Advance notice of the start of construction sha be delivered to all noise sensitive receptors adjacent to the project area. The notice shall state specifically where and who construction activities will occur, and provide contact information for filing noise complaints with the Construction Contractor and the District. In the event of noise complaints noise shall be monitored from the construction activity to ensure that construction noise is not obtrusive.
SC-N-9	Construction Contractor shall ensure that LAUSD interior classroom noise standards are met to the maximum extent feasible, or that construction noise is not disruptive to the instructional environment, through implementation of noise control measures, as necessary. ² Noise control measures may include, but are not limited to:
	Path Controls Noise Attenuation Barriers ³ – Temporary noise attenuation barriers installed blocking the line of sight between the noise source and the receiver. Intervening barriers already present, such as berms or buildings, may provide sufficient noise attenuation, eliminating the need for installing noise attenuation barriers.
	Source Controls Scheduling – performing noisy work during less sensitive time periods (on operating campus: delay the loudest noise generation until class instruction at the nearest classrooms has ended; residential areas: only between 7:00 AM and 7:00
	PM) Substitute Methods – using quieter methods and/or equipment
	Exhaust Mufflers – ensuring equipment have quality mufflers installed
	Lubrication & Maintenance – well maintained equipment is quieter

Quieter Backup Alarms – manually-adjustable or ambient sensitive types If OEHS determines that the above noise reduction measures will not reduce construction noise to below the levels permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: Receptor Controls Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity. NOTE: * 1L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour. * The need for noise control measures will vary depending on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be anticipated if the "Excavation/Grading" phase of a major construction project will take place within 446 feet of an active exterior use area (e.g., playgrounds, athletic fields, etc.) or within 316 feet of an active classroom on an LAUSD campus. If construction equipment is limited to a single excavator, the need for noise control measures may be anticipated if the excavator is operating within 252 feet of an active exterior use area or within 178 feet of an active classroom on an LAUSD campus. ³ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier would be: Noise Attenuation Barrier		
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 permitted by LAUSD's noise standards LAUSD shall mandate that construction bid contracts include the following receptor controls: <u>Receptor Controls</u> Temporary Window Treatments – temporarily reinforcing the building's noise reduction ability Temporary Relocation – in extreme otherwise unmitigable cases, students shall be moved to temporary classrooms / facilities away from the construction activity. NOTE: ¹L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour. ² The need for noise control measures will vary depending on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be anticipated if the "Excavation/Grading" phase of a major construction project will take place within 446 feet of an active exterior use area (e.g., playgrounds, athletic fields, etc.) or within 316 feet of an active classroom on an LAUSD campus. If construction equipment is limited to a single excavator, the need for noise control measures may be anticipated if the excavator is operating within 252 feet of an active exterior use area or within 178 feet of an active classroom on an LAUSD campus. ³ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barrie		Quieter Backup Alarms – manually-adjustable or ambient sensitive types
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¹ L10 value represents the noise level that is exceeded 10% of the time or 6 minutes in an hour. ² The need for noise control measures will vary depending on the type and quantity of equipment being used, the work being performed, and the proximity of the construction activity to active exterior use areas (e.g., playgrounds, athletic fields, etc.) or classrooms. For example, the need for noise control measures may be anticipated if the "Excavation/Grading" phase of a major construction project will take place within 446 feet of an active exterior use area (e.g., playgrounds, athletic fields, etc.) or within 316 feet of an active classroom on an LAUSD campus. If construction equipment is limited to a single excavator, the need for noise control measures may be anticipated if the excavator is operating within 252 feet of an active exterior use area or within 178 feet of an active classroom on an LAUSD campus. ³ While the height and Sound Transmission Class (STC) rating of the Noise Attenuation Barrier needed will depend on the project specific conditions, an example of the specifications for a Noise Attenuation Barrier would be: Noise Attenuation Barriers		
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shall be a minimum neight of 12 reet and have a minimum Sound Transmission Class rating of 25 (STC-25).	³ While the he	

The project site is located between Vernon Avenue to the north, Compton Avenue to the east, 46th Street to the south, and Ascot Avenue to the west in an urban area of the City of Los Angeles. Land uses in the project area consists primarily of several single and multi-family residential land uses, but also include a few commercial properties and churches. The nearest residence to the Project site is located 18.2 feet south of the site, on the opposite site of the alley south of the Project site. Ambient noise measurements conducted in November 2018 were taken at five locations of the nearest sensitive receptors, indicated below as R1 through R5. Existing noise sensitive uses on the project site and in the immediate vicinity include (see Figure 4, Sensitive Receptors, and Figure 4.1, Noise Measurement Locations, in Appendix H):

- Onsite: School classrooms;
- To the north: a mix of single- and multi-family residences are located along Vernon Avenue West 14th (R4);
- To the east: a mix of commercial land uses, single- and multi-family residences are located along Compton Avenue (R2 and R3);
- To the south: a mix of single- and multi-family residences are located along an alley behind Ascot • Elementary along 46th Street (R1); and
- To the west: a church and a mix of single and multi-family residences are located along Ascot Avenue • (R5).

Short-term (15-minute) noise measurements were conducted at locations R1 through R5 between approximately 11:00 a.m. and 1:00 p.m. on Tuesday, November 6, 2018, to characterize the existing noise environment in the project vicinity. The typical school-related noise, such as student and staff trips, outdoor



physical education activity, and student conversation, were included in the ambient noise measurements. Therefore, the measured ambient noise levels represent a normal baseline ambient noise environment from which to perform the noise analysis included in Appendix H. Ambient noise levels ranged from 57.9 A-weighted decibels (dBA) on the west side of Ascot Avenue (across the street and to the west of the Project site) to 69.1 dBA on the north side of East Vernon Avenue (across the street and to the north of the Project site). Within the alley immediately south of the Project site (near the closest residential sensitive receptor), baseline noise levels were recorded at 65.2 dBA.

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Less than Significant Impact. The proposed Project would result in less than significant impacts because its potential to expose persons to noise levels in excess of standards established by the City of Los Angeles and the LAUSD would be avoided through implementation of SCs. A detailed noise study has been conducted to identify impacts associated with exposure of persons to or generation of noise levels in excess of established LAUSD and City standards (see Appendix H). The noise study has evaluated construction (short-term) and operational (long-term) noise impacts associated with the proposed Project, and mitigation measures have not been provided. Sensitive noise receptors including churches and residential units are located within 19 feet of the site (see Figure 4). For existing schools, LAUSD considers noise level increases of 3 dBA or more over ambient noise levels to be significant. Pursuant to Education Code Section 17215 and the LAUSD SUP Program EIR, the exterior noise significance threshold for school sites is 67 dBA. Ambient noise levels at the nearest sensitive receptor are approximately 55.2 dBA during school days. Noise generated during construction of the proposed Project would result in a temporary or periodic increase in ambient noise levels. These receptors would be exposed to construction noise. The Project site does not have sufficient shielding to block the line-of-sight between the campus and the public right-of-way. The greatest noise impacts occur at the closest receptors on campus (students) and immediately south of the Project site (residences) for all construction phases. Increases in excess of 28 dBA are predicted at sensitive receptors on and around the project site without implementation of SCs (see Table 6.1, Estimated Unmitigated Construction Noise Levels at Sensitive Receptors, in Appendix H). Implementation of SCs N-1, N-4, N-5, N-8, and N-9 would be required to maintain construction noise levels below the threshold of significance. Additionally, as stated in the Project Description, Project construction shall be following the LAMC, which prohibits any construction, or repair work, of any kind between the hours of 9:00 p.m. and 7:00 a.m. of the following day. It also prohibits construction activities before 8:00 a.m. or after 6:00 p.m. on any Saturday, or national holiday, or at any time on any Sunday.

During operation, noise levels would be similar to existing levels (or slightly reduced) at the Ascot ES campus because there would be no increase in capacity and the new buildings would meet the requirements of SCs N-1, N-2, N-3, and N-8 to achieve classroom acoustical quality consistent with the current School Design Guide and CHPS standard of 45 dBA equivalent sound level (L_{eq}). Operation of the facility after construction is not anticipated to increase vehicular traffic to the Campus; therefore, no net change in traffic is anticipated from the proposed Project. The school-related traffic and outdoor school activities would result in similar noise levels to the existing elementary school during operations.. The school buildings and exterior playground areas at the existing elementary school would still be exposed to traffic noise from Ascot Avenue, E Vernon Avenue, Compton Avenue, and E 45th Street. Peak traffic may be slightly more concentrated along Ascot Avenue than

E 45th Street as a result of the relocation of the administration building and main entrance to the Campus. However, design features such as a solid wall along the southern edge of campus (near residences) to replace the existing slatted chain link fence and other site-specific project design features would maintain similar or slightly reduced noise levels than the baseline condition. Therefore, with implementation of SCs N-1 through N-9, impacts in relation to increases in ambient noise levels would be less than significant. No mitigation or further study is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant with Mitigation Incorporated. The proposed Project would result in potentially significant impacts in relation to generation of excessive groundborne vibration or groundborne noise levels, which would be reduced to below the level of significance with the incorporation of mitigation measures. Construction activities typically create an increase in groundborne vibrations and noise levels. Groundborne vibration would be generated from the operation of heavy construction equipment at the project site, which could potentially affect the existing sensitive land uses surrounding the site, as well as the students on Campus. Groundborne vibrations and noise generated by construction activities associated with the proposed Project would increase noise levels intermittently at nearby sensitive receptors, which include Ascot Avenue Elementary School and residences (within 50 feet).

Ground-borne vibration levels resulting from construction activities at the project site were estimated using data published by the Federal Transit Administration (FTA) in its Transit Noise and Vibration Impact Assessment (2006) document. Construction of the proposed Project would involve use of construction equipment including large bulldozers, caisson drilling, loaded trucks, jackhammers, and small bulldozers, which would have the potential to impact the existing school buildings and surrounding offsite structures. Pile driving would not be required for the proposed Project. For existing school buildings, the construction equipment could be located within 15 feet of structures, which would result in a significant impact. Although the proposed Project would require compliance with SC-N-8, impacts would not be reduced to less than significant. The proposed Project would have the potential to impact the existing school buildings and surrounding offsite structures during construction because the construction equipment could be located within 15 feet of structures.

The offsite structures are considered to be non-engineered timber structures. The vibration impact threshold for the offsite structures would be 0.2 inch per second (in/sec) peak particle velocity (PPV). The PPV level of a large bulldozer at 25 feet would be 0.089 in/sec PPV. In order to exceed 0.2 in/sec PPV, a large bulldozer needs to be as close as 15 feet from the offsite structures. The closest offsite structure to the Project site is located at 18 feet, bring vibration levels close to 0.2 in/sec PPV. Therefore, offsite structures vibration impacts would be significant.

Construction-related vibration could annoy people within a nearby building. The vibration impact threshold for human annoyance at a residential structure is 78 vibration decibels (VdB). In order to exceed 78 VdB, a large bulldozer would need to be located as close as 50 feet from the structures. As stated above, the nearest residential structures are located within 18 feet from the project site. Therefore, project-related vibration levels of 78 VdB, or greater, would be experienced at offsite structures and impacts would be significant. Although the proposed Project would require compliance with SC-N-5, impacts would not be reduced to less-thansignificant levels and mitigation would be required. In addition, construction-related vibration could cause



annoyance to onsite students while class is in session. The vibration impact threshold for human annoyance within classrooms is 84 VdB, considering the sensitivity would be similar to an office environment as presented in Table 3.2 of Appendix H. In order to exceed 84 VdB, a large bulldozer would need to be located as close as 30 feet from classrooms. Given the configuration of the Project site, it would be possible for construction equipment to be within 30 feet from classrooms, therefore this impact would be considered potentially significant. Although the proposed Project would require compliance with SC-N-5, impacts would not be reduced to below the level of significance. Therefore, the consideration of mitigation measures is required.

Mitigation Measure Vibration-1: To avoid structural damage, when the construction equipment is within 15 feet of existing school buildings, large construction equipment (greater than 300 horsepower), such as large bulldozer and loaded trucks, shall be replaced with smaller equipment (less than 300 horsepower) when feasible.

Mitigation Measure Vibration-2: In the event that construction activity would occur within 30 feet of occupied classrooms, large construction equipment (greater than 300 horsepower), such as large bulldozer and loaded trucks, shall be replaced with smaller equipment (less than 300 horsepower). If not feasible, construction activities requiring such equipment will be scheduled at times when school is not in session.

After implementation of Mitigation Measure Vibration-1, impacts related to structural damage by vibration would be less than significant. This is vibrational energy from smaller construction equipment (less than 300 horsepower) at distances within 15 feet would be below the threshold of 0.2 in/sec.

After implementation of Mitigation Measure Vibration-2, impacts related to human annoyance from vibration would be reduced. This is because smaller construction equipment (less than 300 horsepower), at distances within 30 feet of classrooms, would generate vibrational velocity levels that would not trigger human annoyance. For instance, a small bulldozer, at a distance of 25 feet, would generate vibration velocity levels of approximately 58 (VdB), which is below the groundborne vibration criteria regarding human annoyance of 84 (VdB). Therefore, impacts would be less than significant after implementation of mitigation measures with respect to structural damage during construction and human annoyance from vibration.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed Project would result in no impact in relation to airstrips or airports because it would not be located within the vicinity of a private airstrip, an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. The nearest public airport to the proposed Project is the Los Angeles International Airport (LAX), located approximately 15 miles southwest of the proposed Project site. Since the proposed Project site is not located within 2 miles of an airport, no impact associated with airport noise would occur. No mitigation or further study is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PEDESTRIAN SAFETY. Would the project:				
a. Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?			\boxtimes	
b. Create unsafe routes to schools for students walking from local neighborhoods?			\boxtimes	
c. Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?			\square	

Explanation:

Pedestrian safety has been evaluated based on a Site Circulation Report and a technical evaluation of traffic and pedestrian safety for the proposed Project (see Appendix I, *Site Circulation Report*, and Appendix J, *Pedestrian and Safety Study for Ascot Avenue Elementary School Comprehensive Modernization Project*). LAUSD has seven SCs for minimizing impacts to pedestrian safety. Applicable SCs related to pedestrian safety impacts associated with the proposed Project are provided below:

LAUSD Standard Conditions of Approval

LAUSD	Standard Conditions of Approval
SC- PED-2	LAUSD shall implement the applicable requirements and recommendations associated with the OEHS Traffic and Pedestrian Safety Program.
	OEHS Traffic and Pedestrian Safety Program
	LAUSD has developed these performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools. The performance guidelines include the requirements for: student drop-off areas, vehicle access, and pedestrian routes to school. School traffic/circulation studies shall identify measures to ensure separation between pedestrians and vehicles along potential pedestrian routes, such as sidewalks, crosswalks, bike paths, crossing guards, pedestrian and traffic signals, stop signs, warning signs, and other pedestrian access measures.
SC- PED-3	LAUSD shall implement the applicable sidewalk requirements outlined in the School Design Guide. LAUSD shall also coordinate with the responsible traffic jurisdiction/agency to implement infrastructure improvements prior to the opening of a school. Improvements shall include, but are not limited to:
	 Clearly designate passenger loading areas with the use of signage, painted curbs, etc.
	 Install new walkway and/or sidewalk segments where none exist.
	Substandard walkway/sidewalk segments shall be improved to a minimum of eight feet wide.
	Provide other alternative measures that separate foot traffic from vehicular traffic, such as distinct travel pathways or barricades.
SC- PED-4	LAUSD shall design the project to comply with the traffic and pedestrian guidelines in the School Traffic Safety Reference Guide.
	School Traffic Safety Reference Guide REF- 4492.1.
	This Reference Guide replaces Reference Guide 4492.0, School Traffic Safety, September 30, 2008. Updated information is provided, including new guidance on passenger loading zones and the Safety Valet Program. Guide sets forth requirements for traffic and pedestrian safety, and procedures for school principals to request assistance from OEHS, the Los Angeles Schools Police Department (LASPD), or the local police department regarding traffic and pedestrian safety. Distribution and posting of the Back to School Safety Tips flyer is required. This guide also includes procedures for traffic controls, crossing guards, or for determinations on whether vehicle enforcement is required to ensure the safety of students and staff.
SC-T-3	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide.



	School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.		
SC-T-4	 LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. Implementation of SR2S, traffic control and pedestrian safety devices. Fair share contribution and/or other mitigation measures for potential traffic impacts. Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (or comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles, and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charter, etc.), unless otherwise required by local jurisdiction. 		
	Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate loading needs and will control double parking and across-the-street loading.		

¹ The proposed Project would not be located on a new campus or result in an increase in student capacity by more than 25% or 10 classrooms.

² The proposed Project would not increase student capacity by more than 25% or generate additional traffic because there is no anticipated increase in capacity as a result of the proposed Project.

The Project site is bound by E Vernon Avenue to the north, Compton Avenue to the east, the E 45th Street cul-de-sac and an alley to the south, and Ascot Avenue to the west. Seven crosswalks provide access to the block on which the campus is located:

- 1. Across Ascot Avenue south of E Vernon Avenue (towards northwestern corner of campus)
- 2. Across E Vernon Avenue east of Ascot Avenue (towards northwestern corner of campus)
- 3. Across E Vernon Avenue west of Compton Avenue (towards northeastern corner of campus)
- 4. Across Compton Avenue south of E Vernon Avenue (towards northeastern corner of campus)
- 5. Across E 45th Street west of Compton Avenue (towards southeastern corner of campus)
- 6. Across Ascot Avenue south of E 45th Street (towards western edge of campus)
- 7. Across Ascot Avenue north of E 45th Street (towards western edge of campus)

The campus is surrounded by a chain-link fence, with driveway access controlled at locked gates at five locations:

- 1. Entrance driveway at E Vernon Avenue to the northwestern teacher parking lot
- 2. Exit driveway at E Vernon Avenue to the northwestern teacher parking lot
- 3. Driveway at E Vernon Avenue leading to the parking lot under Building 14
- 4. Driveway at the end of the E 45th Street cul-de-sac to teacher parking
- 5. Driveway south of the E 45th Street cul-de-sac to teacher parking

Pedestrian access is controlled at locked gates at eight locations:

- 1. In the northwestern teacher parking lot
- 2. At E Vernon Avenue and Compton Avenue for access to the Building 14 teacher parking lot
- 3. At Compton Avenue (Kindergarten access)
- 4. At E 45th Street (Kindergarten access)
- 5. The main school entrance gate at E 45th Street
- 6. The southeastern teacher parking lots
- 7. The old Arco Iris Primary Center gate at the southwestern corner of the site off Ascot Avenue
- 8. Ascot Avenue near the northern crosswalk towards the continuation of E 45th Street

The existing administration building on campus (Building 1) is located at the end of the E 45th Street cul-desac and accessed from Compton Avenue. The current bell schedule is 7:45 a.m. to 2:14 p.m. The main pickup/drop-off loading zones on campus are located at the west side of the campus (approximately 130 feet along Ascot Avenue) and the east side of the campus along the north side of the cul-de-sac area for 45th Street west of Compton Avenue (near Building 1). The City of Los Angeles Vision Zero 2015-2025 Initiative has identified Compton Avenue from E Vernon Avenue south to E Slauson Avenue as part of the City's High Injury Network (HIN; Figure 15, *City of Los Angeles Vision Zero High Injury Network*).¹³¹

The 2018 *Site Circulation Report* prepared to evaluate existing circulation conditions at Ascot ES observed existing pick-up/drop-off and pedestrian circulation deficiencies including vehicle congestion along both E 45th Street and Ascot Avenue during pick-up/drop-off and the need for crossing guards at major intersections around campus (see Appendix I). During field observations conducted November 14, 2018, the 2019 *Pedestrian and Safety Study for Ascot Avenue Elementary School Comprehensive Modernization Project* observed double-parked and triple-parked vehicles within the E 45th Street cul-de-sac, as well as vehicles permanently parked along the loading zone and vehicles parked in the red curb area during student unloading activities (see Appendix J). Vehicles were also observed to double park and permanently park within the loading zone on Ascot Avenue during the November 14, 2018, field observations at the cul-de-sac on 45th Street during the pick-up/drop-off period. One crossing guard was observed at the Compton Avenue/46th Street intersection southeast of the Ascot ES campus in November 2018. The pedestrian safe routes to school prepared by LADOT for Ascot ES (see Attachment B, LADOT Pedestrian Routes for Ascot Avenue Elementary School, in Appendix J):

- 1. 45th Street and Ascot Avenue (unsignalized T-intersection with stop control one all movements, located immediately west of Project site)
- 2. Vernon Avenue and Compton Avenue (signalized intersection located immediately northeast of Project site)
- 3. Compton Avenue and 46th Street (unsignalized intersection with stop control on 46th Street, located one-half block southeast of Project site)

¹³¹ City of Los Angeles and Its Partners. n.d. Vision Zero Los Angeles: 2015-2025. Available at: http://visionzero.lacity.org/; 2018 High-Injury Network data available at: http://geohub.lacity.org/datasets/a1fb5f1eb42a4e139cc8c89b468865a7_0



There are 83 existing parking spaces for teachers located on the northwestern (33 marked spaces), northeastern (24 marked spaces below Building 14), and southeastern (26 marked spaces) portions of the campus, separated from the student spaces with chain-link fences (see Appendix I). All of the on-site parking spaces are currently utilized by only the staff/administration for the school. Driveways provide teacher access through gated entrances across sidewalks to surface parking from E Vernon Avenue and the E 45th Street cul-de-sac.

Impact Analysis

a) Substantially increase vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to vehicular and/or pedestrian safety hazards. LAUSD SCs require that performance guidelines to minimize potential pedestrian safety risks to students, faculty and staff, and visitors at LAUSD schools are taken into consideration in the design of sidewalks, new student drop-off, pick-up, bus loading areas, and parking areas. The proposed Project would not change the existing use of the site, increase the student enrollment capacity of the school, or alter the sidewalk surrounding the Project site. The proposed Project is limited to replacing portions of the perimeter fence around the existing elementary school and modernizing the campus itself, including repaying ground surfaces to facilitate ADA access and demolishing and replacing other buildings on campus. Although the proposed Project would not remove drop-off access or teacher parking access from the E 45th Street cul-de-sac, relocating the administration building along Ascot Avenue would relocate the majority of the loading activities towards Ascot Avenue (see Appendix J). Any late arrivals or access to campus during school hours would require controlled entry and access via Ascot Avenue with check-in required at the new Administration Office. The proposed Project would concentrate surface parking for teachers in the existing northeastern corner of the campus and a new parking lot along the southern edge of the campus adjacent to an alley and a new solid wall. Teacher access to surface parking would be available via E Vernon Avenue (parking below existing Building 14), the E 45th Street cul-de-sac, and Ascot Avenue. Both existing and proposed surface parking would remain fenced off from student access. During both construction and operation, implementation of SCs PED-2, PED-3, PED-4, and T-4 would be required to minimize pedestrian safety risks to students.

The proposed Project has the potential to temporarily increase vehicular and/or pedestrian safety hazards during construction. Construction activity and operation of the proposed Project would result in new vehicle and pedestrian circulation patterns on and adjacent to the site. Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours.

During operation, impacts regarding increased vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses would be less than significant. The Project site is an existing elementary school with 55 teaching stations. The proposed Project would be a compatible use because it would remain an elementary school in a residential neighborhood. The proposed Project would involve replacement of existing buildings on campus, providing a designated ADA route from the four existing buildings to the public right-of-way and new buildings, and completing other improvements as required by the ADA, under LAUSD's SUP and to improve seismic safety. With implementation of the proposed Project, there would be a slight reduction in teaching stations (47) and approximately 3,937 additional square feet of buildings on campus. The administration building would be relocated from the southeastern portion of the campus adjacent to E 45th

Street near Compton Avenue to the west side of the campus along Ascot Avenue. The relocation of the administration building would have a minor effect on drop-off as both E 45th Street and Ascot Avenue are already congested during drop-off and pick-up times (see Appendix J). There would be more vehicles parking at Ascot Avenue for late student arrivals, which could affect the bus parking currently conducted along Ascot Avenue. During both construction and operation, implementation of SCs PED-2, PED-3, PED-4, and T-4 would be required to minimize pedestrian safety risks to students. Therefore, the proposed Project would result in less than significant impacts regarding increased vehicular and/or pedestrian safety hazards due to a design feature or incompatible uses, and no mitigation or further study is required.

b) Create unsafe routes to schools for students walking from local neighborhoods?

Less than Significant Impact. The proposed Project would result in less than significant impacts after implementation of SCs in relation to creating unsafe routes to school for students walking from local neighborhoods. The proposed Project would not change the existing use of the site, increase the capacity of the school, or alter the sidewalk surrounding the Project site. During both construction and operation, implementation of SCs PED-2, PED-3, PED-4, and T-4 would be required to minimize pedestrian safety risks to students regarding sidewalk access. During construction, the proposed Project would involve construction vehicles entering and exiting the Project site. Construction workers would not be permitted to park on local streets. Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours. Implementation of SCs would be required to ensure the safety of pedestrian access to the Ascot ES during construction activities through planning and coordination.

During operation, the proposed Project would result in less than significant impacts in relation to creating unsafe routes to schools for students walking from local neighborhoods. The Project site is an existing elementary school located within a residential area that serves the local neighborhood. As the proposed Project is not designed or expected to increase the current capacity of the Ascot ES campus, there would be no additional vehicle trips for school drop-off/pick-up after construction activities are complete. There would be a minor shift in vehicular traffic from E 45th Street cul-de-sac to Ascot Avenue where the new administration building would be situated. During both construction and operation, implementation of SCs PED-2, PED-3, PED-4, and T-4 would be required to minimize pedestrian safety risks to students. Therefore, the proposed Project would result in less than significant impacts in relation to creating unsafe routes to school, and no mitigation or further study is required.

c) Be located on a site that is adjacent to or near a major arterial roadway or freeway that may pose a safety hazard?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to being located on a site adjacent to or near a major arterial roadway or freeway that may pose a safety hazard, because the Project site is located approximately 1.4 miles south of the Santa Monica Freeway (Interstate-10) and approximately 1.8 miles east of the Harbor Freeway (Interstate 110). However, during drop-off/pick-up times, there is an existing potential safety hazard due to the Project site's location adjacent to two arterial streets.

The Project site is located along the eastbound side of E Vernon Avenue, which the City of Los Angeles has designated as Avenue II Modified in the Southeast Los Angeles Community Plan and City of Los Angeles



Mobility Element 2035.^{132, 133} The Project site is located along the northbound side of Compton Avenue, which is designated as Avenue II (previous designation: Secondary Highway). Ascot Avenue, E 45th Street, and 46th Street are designated as Local Standard streets. Avenue II and Avenue II Modified streets are types of arterial streets as defined in the City of Los Angeles Mobility Element 2035.¹³⁴ The proposed Project would result in temporary impacts to the circulation system during construction activities and slightly reduce potential pedestrian safety risks at Compton Avenue, a HIN street, as a result of relocation of the administration building and the associated shift in pedestrian traffic and drop off from E 45th Street at Compton Avenue to Ascot Avenue (see Appendix J). The proposed Project would shift a portion of drop-off and pick-up traffic by one block from E 45th Street to Ascot Avenue as a result of the relocation of the administration building from the east to the west side of the campus (see Appendix J). This shift in peak traffic from E 45th Street to Ascot Avenue would slightly reduce traffic from Compton Avenue, a HIN street, to access the E 45th Street cul-desac where the existing administrative building is located.

During school hours, the campus is completely enclosed by chain-link fences with locked gates, and students and parents can only access the campus through the administration building. This would be the same condition with the proposed Project, with the perimeter fence being retained on the north and east sides and replaced on the southeast, south, and west sides to avoid potential safety hazards to students during school hours. During both construction and operation, implementation of SCs PED-2, PED-3, PED-4, and T-4 would be required to minimize pedestrian safety risks to students. Therefore, impacts would be less than significant, and no mitigation or further study is required.

¹³² City of Los Angeles Department of City Planning, Information Technologies Division. November 11, 2017. Southeast Los Angeles: Circulation. Available at: https://planning.lacity.org/complan/central/pdf/Sel_Circulation.pdf

¹³³ Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf

¹³⁴ Ibid.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. POPULATION AND HOUSING. Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				\boxtimes

Explanation:

The Program EIR contains one SC for minimizing project impacts to population and housing, but it is not applicable to the proposed Project, as the proposed Project would not displace residential or business property. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to population and housing.

Ascot ES, an existing elementary school, has been in operation on the Project site since 1896. The enrollment racial makeup of the community is 95.4 percent Hispanic or Latino, 3.1 percent African American, 0.8 percent white, 0.2 American Indian or Alaska Native, 0.2 Pacific Islander, 0.1 percent Filipino, and 0.0 percent Asian.¹³⁵ Over the last four years of operation, Ascot ES has served up to 936 students (see Table 2, *Enrollment at Ascot ES, 2014–2018*), including most recently TK to fifth grade. Total school enrollment in the City of Los Angeles has experienced a net reduction since 2003. This decrease may be due to reduced birthrates and cost of living increases (including housing).¹³⁶

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The proposed Project would not induce population growth in the Project area. The Project site is currently an operational and active school serving students from TK to fifth grade. The proposed Project would not increase the student population but is intended to provide appropriate facilities for the current student capacity. Therefore, there would be no impact. No mitigation or further study is required.

https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/123/13_Enrollment%20Trends%20and%20Projections%2 02017-18%2006-05-2017.pdf. Accessed January 15, 2019.



¹³⁵ California Department of Education. n.d. 2017-2018 Enrollment by Ethnicity, Ascot Avenue Elementary Report (19-64733-6015887). Available at:

https://dq.cde.ca.gov/dataquest/dqcensus/EnrEthLevels.aspx?cds=19647336015887&agglevel=School&year=2017-18. Accessed January 15, 2019.

¹³⁶ LAUSD. n.d. Los Angeles Unified School District, 2017- 2018 Superintendent's Final Budget District Enrollment Trends. Available at:

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The proposed Project would be located within the footprint of an existing school, and it would not include any activities that would affect or displace existing housing. There are no residents on the Project site, and the proposed Project would not result in population or housing displacement of the surrounding community. Students displaced by classroom demolition during construction would be relocated to vacant classrooms or temporary on-site classrooms such as portables while the new facilities are being constructed. Therefore, there would be no impact. No mitigation or further study is required.

	Less Than		
Potentially	Significant	Less Than	
Significant	with Mitigation	Significant	No
Impact	Incorporated	Impact	Impact

XVI. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

a. Fire protection?		\boxtimes	
b. Police protection?		\boxtimes	
c. Schools?		\boxtimes	
d. Parks?			\bowtie
e. Other public facilities?			\boxtimes

Explanation:

The Program EIR contains two SCs for minimizing Project impacts to public services, one of which is applicable to the proposed Project. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to public services.

LAUSD Standard Conditions of Approval

SC-PS-1 If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval:

2. Provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.

The Project site is an elementary school campus that is currently served by LAFD Station 21 and the Los Angeles Police Department (LAPD) Newton Station (Figure 16, *Public Services in the Vicinity of the Project Site*).¹³⁷ Fire Station 21 staffs 48 firefighters and consists of one fire truck, one fire engine, one ambulance, and one squad.¹³⁸ Secondary fire protection services could be provided by one of two fire stations: Fire Station 14 (located approximately 1.2 miles from the proposed Project site at 3401 S Central Ave, Los Angeles, CA 90011) and Fire Station 77 (located approximately 1.2 miles from the proposed Project site at 4301 S Santa Fe Ave, Vernon, CA 90058). Fire protection service needs are generally related to the size of the population and geographic area served, the number and types of calls for service, and other community and physical characteristics.¹³⁹



¹³⁷ City of Los Angeles Department of City Planning. n.d. ZIMAS. Address: 1447 E. 45th Street. Available at: http://zimas.lacity.org/. Accessed 14 January 2019.

¹³⁸ Montejano, Norma, Sapphos Environmental, Inc. January 11, 2019. Phone call with LAFD Station 21. Subject: Staff and Equipment at LAFD Station 21.

¹³⁹ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

The LAUSD also maintains its own police department to provide security for LAUSD schools and centers within its jurisdiction.¹⁴⁰ The Los Angeles School Police Department (LASPD) would provide the primary law enforcement for the proposed Project. LAPD would be the secondary provider in police protection services within the Project area. The Newton Station is located approximately 1.2 miles from the proposed Project at 3400 S Central Ave, Los Angeles, CA 90011. The LAPD currently has 9,824 sworn officers, which represents a service population ratio of 2.59 officers per 1,000 population.

The neighborhood is served by both parks operated by the County of Los Angeles Department of Parks and Recreation and the City of Los Angeles Department of Recreation and Parks. According to the County of Los Angeles' 2016 *Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment*, the City of LA Southeast Los Angeles - North Study Area (#169) contains only 0.6 park acre per 1,000 population to support a population of approximately 137,819, below the county average of 3.3 park acres per 1,000 population.¹⁴¹ However, approximately 84 percent of the population lives within a half-mile of a park, well above the county average of 49 percent regarding park accessibility. The Project site is located approximately one-quarter mile northwest of the nearest existing park: Fred Roberts Recreation Center, located at 4700 Honduras St, Los Angeles, CA 90011.

Emergency room services in the Project area are provided by Community Hospital of Huntington Park (located approximately 1.7 miles southeast of the Project site at 2623 Slauson Avenue, Huntington Park, CA 90255) and Dignity Health – California Hospital Medical Center (located approximately 2.5 miles northwest of the Project site at 1401 S. Grand Avenue, Los Angeles, CA 90015) (Figure 17, *Acute Care Hospital Map*). Both of these hospitals offer emergency room services 24 hours per day, 7 days per week.

Other public facilities available near the Project site are the Vernon Branch Public Library (located approximately 0.5 mile west of the Project site at 4504 S. Central Avenue, Los Angeles, CA 90011) and Washington Station Post Office (located approximately at 0.5 mile west of the Project site at 4352 S. Central Avenue, Los Angeles, CA 90011).

a) Fire protection?

Less than Significant Impact. The proposed Project would result in less than significant impacts regarding fire protection services. Fire protection services are currently provided to the site by the LAFD. Fire Station 21 would be the primary responder.¹⁴² As the proposed Project would not increase the capacity of the existing elementary school, response times would not be affected by the proposed Project. SC-PS-1 would be implemented as part of the proposed Project, and LAUSD would have the local fire jurisdiction review and approve site plans. As such, the proposed Project would not generate a need for a new fire station. Therefore, there would be less than significant impacts related to construction of new facilities or alteration existing facilities in relation to fire services. No mitigation or further study is required.

¹⁴⁰ Ibid.

¹⁴¹ Los Angeles County Department of Parks and Recreation. May 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of LA Southeast Los Angeles – North Study Area. Available at:

http://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_169.pdf Main website: https://lacountyparkneeds.org/ ¹⁴² City of Los Angeles. n.d. Neighborhood Fire Stations. Available at: http://www.lafd.org/fsloc.htm

b) Police protection?

Less than Significant Impact. The proposed Project would result in less than significant impacts regarding the provision of new or physically altered police protection facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection. The proposed Project is designed to serve the existing Central Alameda neighborhood and SELA Community Plan Area of the City of Los Angeles. The modernization of Ascot ES would not increase housing or employment opportunities in the vicinity of Ascot ES; therefore, there would be no need to construct new facilities or alter existing facilities that support LASPD primary or LAPD secondary responders. SC-PS-1 would be implemented as part of the proposed Project, and LAUSD would have the local police jurisdiction review and approve site plans. As the proposed Project would not increase the capacity of the existing elementary school, the proposed Project would not create an increased demand for police services. Therefore, there would be less than significant impacts related to police protection. No mitigation or further study is required.

c) Schools?

Less than Significant Impact. The proposed Project would result in less than significant impacts regarding physically altering an existing school campus other than Ascot ES, which is the subject of this environmental document. The proposed Project consists of modernization of Ascot ES and does not generate a need for new school seats; rather, it would temporarily transfer students to interim classrooms on-site. By modernizing buildings at the existing school, the proposed Project would improve the quality and experience of education for LAUSD students. Therefore, there would be less than significant impacts related to construction of new school or alteration of schools other than Ascot ES. No mitigation or further study is required.

d) Parks?

No Impact. The proposed Project would result in no impact related to provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks. The proposed Project is not designed or expected to increase the current capacity of the Ascot ES campus. No new or altered government facilities would be required, and the proposed Project would not contribute to increased demand for additional parks. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. With the availability of shared-use open space for recreation onsite, the Project is anticipated to have a beneficial effect on the community. Therefore, there would be no impact. No mitigation or further study is required.

e) Other public facilities?

No Impact. The proposed Project would result in no impact related to the construction of other public facilities, such as hospital, libraries, or post offices. The proposed Project is not designed or expected to increase the current capacity of the Ascot ES campus. No new or altered government facilities would be required, and the proposed Project would not contribute to increased demand for additional public services and facilities. Therefore, there would be no impact. No mitigation or further study is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. RECREATION. Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				\boxtimes
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				

Explanation:

The Program EIR does not include any SCs for minimizing project impacts to recreation. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to recreation.

Ascot ES is located in the Central Alameda neighborhood of Los Angeles. The neighborhood is served by both parks operated by the County of Los Angeles Department of Parks and Recreation and the City of Los Angeles Department of Recreation and Parks (DRP). According to the County of Los Angeles' 2016 *Los Angeles Countywide Comprehensive Park & Recreation Needs Assessment*, the City of LA Southeast Los Angeles - North Study Area (#169) contains only 0.6 park acres per 1,000 population to support a population of approximately 137,819, below the county average of 3.3 park acres per 1,000 population.¹⁴³ However, approximately 84 percent of the population lives within a half-mile of a park, well above the county average of 49 percent regarding park accessibility. The Project site is located approximately one-quarter mile northwest of the nearest existing park: Fred Roberts Recreation Center, located at 4700 Honduras St, Los Angeles, CA 90011.

The nearest public recreation facility to the Project site is Fred Roberts Recreation Center, which is located approximately 0.2 mile southeast of the Project site at 4700 Honduras Street, Los Angeles CA 90011.¹⁴⁴ The 2.5-acre center features barbecue pits, basketball courts (lighted / outdoor), a children's play area, community room, picnic tables, volleyball courts (lighted), kitchen, outdoor fitness equipment, and a synthetic soccer field (unlighted).¹⁴⁵ This DPR facility supports adult/youth basketball sports leagues, soccer, t-ball, volleyball, girls play la (ages 8–15), aerobics, after school program, preschool (ages 3–5), season summer day camp, teen club, tutoring, karate, sport clinics, piano, taekwondo, and a summer lunch program.

¹⁴³ Los Angeles County Department of Parks and Recreation. May 2016. Los Angeles Countywide Comprehensive Parks & Recreation Needs Assessment. City of LA Southeast Los Angeles – North Study Area. Available at: http://lacountyparkneeds.org/FinalReportAppendixA/StudyArea_169.pdf Main website: https://lacountyparkneeds.org/

 ¹⁴⁴ City of Los Angeles Department of Recreation and Parks. n.d. Fred Roberts Recreation Center. Available at: https://www.laparks.org/reccenter/fred-roberts Accessed 18 January 2019.

¹⁴⁵ GreenInfo Network. n.d. California Protected Areas Database (CPAD). Available at: http://www.mapcollaborator.org/cpad/?base=map&y=34.00835&x=-

^{118.24825&}amp;z=16&layers=mapcollab_cpadng_cpad_ownlevel%2Cnotes%2Cpolygons%2Cuploads&opacs=50%2C100%2C25%2 C90. Accessed January 18, 2019.

Ross Snyder Recreation Center is the second nearest public recreation facility to the Project site, located approximately 0.5 mile north of the Project site at 1501 E 41st St, Los Angeles, CA 90011.¹⁴⁶ The center is utilized by many students at Ascot ES. The center occupies 11 acres¹⁴⁷ and encompasses of baseball fields indoor and outdoor basketball courts, picnic areas, a playground, a soccer field, beach volleyball courts and a seasonal outdoor pool. It also regularly hosts sports programs, children's festivals, day camps, and other special events.

In addition, there are existing recreational facilities on the Project site that provide separate, fenced recreation opportunities for pre-K, kindergarten, and grades 1-6 elementary school students. There are three standard play structures are located on rubber surfacing. Two painted basketball courts, two baseball backstops and one painted baseball field without a backstop, a painted track, multiple painted hopscotch outlines, nine painted four-square areas, a painted labyrinth, and a tether-ball poll are available on asphalt surfacing.

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. The proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities that would cause or accelerate substantial deterioration of the facilities. The proposed Project would not induce population growth in the Project area, which would be the principal cause of such an impact. The proposed Project is not designed or expected to increase the current capacity of the Ascot ES campus. Construction of the proposed Project would be phased to allow for operation of portions of the school campus during the construction phase. Recreation facilities required to support school programs would be provided on-site; therefore, there would be no long-term impact on existing recreation facilities and programs within the surrounding South-Alameda neighborhood as a result of the proposed Project. Pursuant to California Education Code Section 38131.b, also known as the Civic Center Act, school facilities would be available during off-school hours for permitted use by public organizations which would add to the available recreation space in the community. While current recreation facilities will need to be replaced, with the construction of new shared-use recreation facilities onsite, the Project is anticipated to result in beneficial effects for the community. Therefore, would be no impact. No mitigation or further study is required.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact. The proposed Project would include recreational facilities for its students. The proposed improvements would not require construction or expansion of off-site facilities. As the proposed Project would not increase the capacity of the existing elementary school, it would not burden any facility beyond capacity by generating additional recreational users. The proposed Project is intended for purposes of enhancing the existing facilities including the outdoor playfields available to the campus. Since adequate recreational facilities

^{118.24825&}amp;z=16&layers=mapcollab_cpadng_cpad_ownlevel%2Cnotes%2Cpolygons%2Cuploads&opacs=50%2C100%2C25%2 C90. Accessed January 18, 2019.



¹⁴⁶ City of Los Angeles Department of Recreation and Parks. n.d. Ross Snyder Recreation Center. Available at: https://www.laparks.org/reccenter/ross-snyder. Accessed January 18, 2019.

¹⁴⁷ GreenInfo Network. n.d. California Protected Areas Database (CPAD). Available at: http://www.mapcollaborator.org/cpad/?base=map&y=34.00835&x=-

would be provided on-site (Monday–Friday until 6:00 p.m.),¹⁴⁸ and students would not be required to use offsite recreational facilities, there would be no impacts associated with the construction of recreational facilities. No mitigation or further study is required.

¹⁴⁸ Montejano, Norma, Sapphos Environmental, Inc. January 18, 2019. Telephone call with LAUSD. Subject: Recreation Uses at Ascot Ave. Elementary School.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. TRANSPORTATION AND CIRCULATION. Would the pre-	oject:			
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?			\boxtimes	
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				\boxtimes
d. Result in inadequate emergency access?				\boxtimes

Explanation:

LIN Consulting, Inc. has prepared a Site Circulation Report evaluating the Project site, and Linscott, Law & Greenspan, Engineers has prepared a technical traffic and pedestrian safety analysis for the proposed Project (see Appendix J, *Traffic and Pedestrian Safety Technical Memorandum*, and Appendix I, *Site Circulation Report*). LAUSD has four SCs for minimizing impacts to transportation and circulation. Applicable SCs related to transportation and circulation impacts associated with the proposed Project are provided below:

LAUSD S	LAUSD Standard Conditions of Approval				
SC-PS-1	 If necessary, LAUSD shall: Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval; Provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated. 				
SC-T-2	LAUSD shall implement the applicable vehicular access and parking design guidelines during the planning process. School Design Guide Vehicular access and parking shall comply with the Vehicular Access and Parking guidelines of the School Design Guide. The Design Guide contains the following regulations related to traffic: Parking Space Requirements General Parking Guidelines Vehicular Access and Pedestrian Safety Parking Structure Security				
SC-T-3	LAUSD shall design new student drop-off, pick-up, bus loading areas, and parking areas to comply with the School Design Guide. School Design Guide. The Guide states student drop-off and pick-up, bus loading areas, and parking areas shall be separated to allow students to enter and exit the school grounds safely.				
SC-T-4	 LAUSD shall coordinate with the local City or County jurisdiction and agree on the following: Compliance with the local jurisdiction's design guidelines for access, parking, and circulation in the vicinity of the project. Scope of analysis and methodology for the traffic and pedestrian study, including trip generation rates, trip distribution, number and location of intersections to be studied, and traffic impact thresholds. Implementation of SR2S, traffic control and pedestrian safety devices. Fair share contribution and/or other mitigation measures for potential traffic impacts. 				



 Traffic and pedestrian safety impact studies shall address local traffic and congestion during morning arrival times, and before and after evening stadium events. 	
 Traffic study will use the latest version of Institute of Transportation Engineer's (ITE) Trip Generation manual (comparable guidelines) to determine trip generation rates (parent vehicles, school buses, staff/faculty vehicles and delivery vehicles) based on the size of the school facility and the specific school type (e.g., Magnet, Charto etc.), unless otherwise required by local jurisdiction. 	,
Loading zones will be analyzed to determine the adequacy as pick-up and drop-off points. Recommendations will be developed in consultation with the local jurisdiction for curb loading bays or curb parking restrictions to accommodate oading needs and will control double parking and across-the-street loading.	

The traffic study for this Project is included as Appendix J to this Initial Study.

The Project site is located along the eastbound side of E Vernon Avenue, which the City of Los Angeles has designated as Avenue II Modified in the Southeast Los Angeles Community Plan and City of Los Angeles Mobility Element 2035.^{149,150} The Project site is located along the northbound side of Compton Avenue, which is designated as Avenue II (previous designation: Secondary Highway). Ascot Avenue, E 45th Street, and 46th Street are designated as Local Standard streets. Avenue II and Avenue II Modified streets are types of arterial streets as defined in the City of Los Angeles Mobility Element 2035.¹⁵¹ The Project site is surrounded by sidewalks supporting pedestrian access to the north, east, southeast, and west. There are no bike lanes on the roads surrounding the Project site. The Los Angeles County Metropolitan Transportation Authority is the only transit operator that provides public transit access to Ascot ES (see Appendix I). Transit access is provided to the Project site by bus stops located along E Vernon Avenue (Line 105 Vernon/Ascot bus stop, Lines 105, 611, and 55/202/355 Compton/Vernon bus stop, and LADOT DASH Southeast) and Compton Avenue (Lines 611, 55/202/355, and DASH Southeast Compton/46th bus stop). The Blue Line Vernon Station is located approximately 0.3 mile (0.5-mile walking distance) east of the Project site.

The 2018 Site Circulation Report evaluated existing circulation conditions at Ascot ES and observed vehicular and pedestrian circulation deficiencies including vehicle congestion along both E 45th Street and Ascot Avenue during pick-up/drop-off and recommended crossing guards at major intersections around campus (see Appendix I). During field observations conducted November 14, 2018, the 2019 *Pedestrian and Safety Study for Ascot Avenue Elementary School Comprehensive Modernization Project* observed double-parked and triple-parked vehicles within the E 45th Street cul-de-sac, as well as vehicles permanently parked along the loading zone and vehicles parked in the red curb area during student unloading activities (see Appendix J). Vehicles were also observed to double park and permanently park within the loading zone on Ascot Avenue during drop-off and pick-up periods.

The existing administration building on campus (Building 1) is located at the end of the E 45th Street cul-desac and accessed from Compton Avenue. The City of Los Angeles Vision Zero 2015-2025 Initiative has

¹⁴⁹ City of Los Angeles Department of City Planning, Information Technologies Division. November 11, 2017. Southeast Los Angeles: Circulation. Available at: https://planning.lacity.org/complan/central/pdf/Sel_Circulation.pdf.

¹⁵⁰ Los Angeles Department of City Planning. 2016. Mobility Plan 2035: An Element of the General Plan. Available at: https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf

¹⁵¹ Ibid.

identified Compton Avenue from E Vernon Avenue south to E Slauson Avenue as part of the City's HIN (see Figure 15, *City of Los Angeles Vision Zero High Injury Network*).¹⁵²

According to Exhibit H, *Critical Facilities & Lifeline Systems*, of the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a City-selected disaster route or highway.¹⁵³ City-selected disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The selected disaster routes also provide a plan for interjurisdictional road reconstruction and rebuilding following a major disaster. The nearest City-selected disaster route to the Project site is Alameda Street, located approximately 0.5 mile east of the Project site.

Ascot ES has a Safe School Plan that identifies two emergency assembly areas on-site: a primary and a secondary evacuation route.¹⁵⁴ The primary evacuation route is from the eastern edge of the campus south on Compton Avenue for less than two blocks, then east on E 46th Street for one block to the parking lot on the northern side of Fred Roberts Recreation Center. The secondary evacuation route is from the eastern edge of the campus north on Compton Avenue for just over five blocks to Ross Snyder Recreation Area at E 41st Street.

Impact Analysis

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact. The proposed Project would result in less than significant impacts in relation to conflicts with a program, plan, ordinance, or policy addressing the circulation system. The proposed Project would result in temporary impacts to the circulation system during construction activities and slightly reduce potential pedestrian safety risks at Compton Avenue, a HIN street, as a result of relocation of the administration building and the associated shift in pedestrian traffic and drop off from E 45th Street at Compton Avenue to Ascot Avenue (see Appendix J). Construction-related traffic and deliveries would be scheduled to avoid student pick-up/drop-off hours. The proposed Project would not change the circulation system during operation because it would not interrupt the nearby bus and transit stops, would not affect any bike lanes, and would not remove any existing sidewalks. The proposed Project would not change the use of the site or increase the capacity of the school. The proposed Project would shift a portion of drop-off and pick-up traffic by one block from E 45th Street to Ascot Avenue as a result of the relocation of the administration building from the east to the west side of the campus (see Appendix J). This shift in peak traffic from E 45th Street to Ascot Avenue would slightly reduce traffic from Compton Avenue, a HIN street, to access the E 45th Street cul-de-sac where the existing administrative building is located. To date the District has received two Tribal requests to be notified about projects within the District. The District sent out a comment request letter to seven local tribes around the Los Angeles area on January 8, 2019. The letter included notification for the Ascot ES

¹⁵⁴ LAUSD School Operations – Emergency Services. September 12, 2016. Safe School Plan: Volume 2 – Emergency Procedures. Quick Reference Guide. Ascot Elementary. Available at: http://ascotavees-lausdca.schoolloop.com/file/1413464101506/4228615928749044812.pdf



¹⁵² City of Los Angeles and Its Partners. n.d. Vision Zero Los Angeles: 2015-2025. Available at: http://visionzero.lacity.org/. Accessed February 15, 2019; 2018 High-Injury Network data available at:

 $http://geohub.lacity.org/datasets/a1fb5f1eb42a4e139cc8c89b468865a7_0$

¹⁵³ Los Angeles Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Exhibit H. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

Comprehensive Modernization project and 10 other LAUSD Comprehensive Modernization projects, along with notification for an additional Classroom Expansion project. The tribes had until February 7 to submit comments or a request for consultation to LAUSD. One request for consultation on the proposed Project was received from the Andrew Salas of the Gabrieleno Band of Mission Indians- Kizh Nation on January 9, 2019. The consultation date is set for March 21, 2019.

b) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Less than Significant Impact. Implementation of the proposed Project would result in less than significant impacts in relation to causing a substantial adverse change in the significance of a tribal cultural resource that has been determined to be eligible for listing in the California Register of Historical Resources (CRHR). No known archaeological resources, inclusive of the consideration of tribal cultural resources, occur on the proposed Project site or within a one-half-mile radius of the proposed Project site. Because the proposed Project site has been subject to grading and other ground-disturbing activities related to the construction of the school in the 1920s and modifications since then, remains of archaeological value are not anticipated to be present on the Project site. However, because of the long period of occupation by indigenous people in what is now Los Angeles, there is a potential for the unanticipated discovery of tribal cultural resources during excavation in native soils. In addition, the school site was originally constructed in the 1920s, prior to the level of protection afforded to cultural resources in conjunction with the adoption of CEQA. If tribal cultural resources are discovered during construction, LAUSD shall implement standard procedures for evaluating and appropriately treating the archeological resources. Therefore, there would be less than significant impacts related to the potential to encounter tribal cultural resources that have been determined eligible for listing in the CRHR. No mitigation or further study is required.

c) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact. Implementation of the proposed Project would result in less than significant impacts in relation to causing a substantial adverse change in the significance of a tribal cultural resource that has been determined by LAUSD to warrant preservation. LAUSD has not identified any Tribal cultural resources that warrant preservation pursuant to Public Resources Code Section 5024.1 within the proposed Project site or within a one-half-mile radius of the proposed Project site.¹⁵⁵ To date the District has received two Tribal requests to be notified about projects within the District. The District sent out a comment request letter to seven local tribes around the Los Angeles area on January 8, 2019. The letter included notification for the Ascot ES Comprehensive Modernization project and 10 other LAUSD Comprehensive Modernization projects, along with notification for an additional Classroom Expansion project. The tribes had until February 7 to submit comments or a request for consultation to LAUSD. One request for consultation on the proposed Project was received from the Andrew Salas of the Gabrieleno Band of Mission Indians- Kizh Nation on January 9, 2019. The consultation date is set for March 21, 2019. Because the proposed Project site has been

¹⁵⁵ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

subject to grading and other ground-disturbing activities, remains of archaeological value are not anticipated to be present on the Project site. Though it is unlikely that tribal cultural resources are present on the proposed Project site, it is possible that construction activity could unearth resources. If tribal cultural resources are discovered during construction, LAUSD shall implement standard procedures for evaluating and appropriately treating the archeological resources. Therefore, there would be less than significant impacts related to the potential to encounter tribal cultural resources that warrant designation by LAUSD. No mitigation or further study is required.



	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a. Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				\boxtimes
c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?				\boxtimes
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				\boxtimes
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				\boxtimes

Explanation:

The Program EIR contains three applicable SCs for minimizing project impacts to utilities and service systems, and three additional standard conditions for avoiding and reducing impacts related to GHGs that are appropriate for reducing or avoiding impacts to utilities and service systems. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to utilities and service systems.

LAUSD Standard Conditions of Approval

SC-USS- 1	Consistent with current LAUSD requirements for recycling construction and demolition waste, the Construction Contractor shall implement the following solid waste reduction efforts during construction and demolition activities:
	School Design Guide.
	Establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75% by weight. Construction and demolition waste shall be recycled to the maximum extent feasible.
	Construction & Demolition Waste Management.
	This document outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and re-use and to minimize disposal in landfills. Requires the collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling, salvaging and/or reusing a minimum of 75% of the C&D waste generated by weight.
SC-USS- 2	LAUSD shall coordinate with the City of Los Angeles Department of Water and Power or other appropriate jurisdictions and departments prior to relocating or upgrading any water facilities to reduce the potential for disruptions in service.

SC-USS- 3	LAUSD shall provide an easily accessible area that services the entire school and is dedicated to the collection and storage of materials for recycling including (at a minimum) paper, cardboard, glass, plastics, metals and landscaping waste. There shall be at least one centralized collection point (loading dock), and ability for separation of recyclables where waste is disposed of for classrooms and common areas such as cafeteria's, gyms or multi-purpose rooms.
SC-GHG- 1	During operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
SC-GHG- 2	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the early morning hours to reduce water loss from evaporation.
SC-GHG- 3	LAUSD shall reset automatic sprinkler timers to water less during cooler months and rainy season.

The Project site is currently serviced by the Hyperion Water Reclamation Plant, which is one of the largest treatment facilities in the world. It provides primary and secondary treatment for roughly 260 million gallons of wastewater per day (mgd). The total permitted capacity is 400 mgd. This facility has more than enough capacity to accommodate the proposed Project. According to the Ascot ES Site Analysis Report, the school currently has a Cold Water Supply of 683 FU. The site has a drainage fixture total of 590 FU. The site is 5.3 acres. Of this area, 5.1 acres consist of hardscape/impervious area and 0.2 acre consists of pervious areas. There are two solid waste collection stations within half a mile of Ascot ES. These are Azeteca Rubbish Control and Azteca Roll Off Service. Ascot ES has a 25-foot storm drain located within the Project site. In addition, the site also has four curb drains and two parkway drains that serve the campus. A 51-inch RCP LA Country Storm Drain Line runs through the middle of the site. Each building has a cold water pipe between 1 inch and 2.5 inches. The school's highest point is in the middle, and it slopes down in all directions at a rate of 1 percent. Ascot ES receives its energy from the LADWP, which provides more than 22 million megawatt hours of electricity to service 1.4 million residential and business customers. The site has a 1,200-amp 65KAIC main switchboard that was installed in 1998. This switchboard is powered by a 750 KVA transformer at the northwest corner of campus. Ascot ES is serviced by three gas meters.

a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

No Impact. The proposed Project would not require the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or the expansion of existing facilities, the construction or relocation of which could cause significant environmental effects. The existing school is serviced by the LADWP for both water and power needs. LADWP has established a UWMP that forecasts future water demands and water supplies for average and dry year conditions.¹⁵⁶ The proposed Project would be adequately served by the existing LADWP facilities, and new or relocated facilities would not be required. Therefore, there would be no impact. No mitigation or further study is required.

¹⁵⁶ Los Angeles Department of Water and Power. n.d. Available at: www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrlstate=gfsvhsaxn_38&_afrLoop=11019765019992. Accessed 24 January 2019.



b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact. The proposed Project would have no impact in regards to sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. The existing school is serviced by LADWP, which has established a UWMP that forecasts future water demands and water supplies for average and dry year conditions.¹⁵⁷ The Project would not result in an increase in student capacity. Therefore, there would be no impact. No mitigation or further study is required.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

No Impact. The proposed Project's wastewater treatment provider would have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. The Project site is currently serviced by the Hyperion Water Reclamation Plant. This facility has more than enough capacity to accommodate the proposed Project. The Project would not result in an increase in student capacity. As a result, any increase in wastewater from the new buildings would have a negligible effect on the wastewater treatment provider. Therefore, the proposed Project's wastewater treatment provider would have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, there are no impacts related to violating applicable federal, state, and local statutes and regulations related to solid waste diversion, reduction, and recycling, no requirement for mitigation. No mitigation or further study is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact. The proposed Project would not negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals. The proposed Project would comply with SC-USS-1, which states that Ascot ES must be consistent with current LAUSD requirements for recycling construction and demolition waste. Furthermore, the School Design Guide (as part of SC-USS-1) establishes a minimum non-hazardous construction and demolition (C&D) debris recycling requirements of 75 percent by weight. Construction and demolition waste shall be recycled to the maximum extent feasible. The Construction & Demolition Waste Management program outlines procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvaging or disposal of non-hazardous waste materials generated during demolition and/or new construction to foster material recovery and reuse and to minimize disposal in landfills. Implementation of the proposed Project would comply with all City, County, and State solid waste diversion, reduction, and recycling mandates, including compliance with the City of Los Angeles Annual Report, Countywide Integrated Waste Management Plan (CIWMP), the Los Angeles Municipal Code, and LAUSD BMPs.¹⁵⁸ Additionally, the student population would remain comparable to the most recent 5 years of enrollment. Therefore, there would be no impact. No mitigation or further study is required.

¹⁵⁷ Ibid.

¹⁵⁸ LAUSD. 2004. New School Construction Program, Program Environmental Impact Report.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Implementation of the proposed Project would comply with all federal, state, and local management and reduction statutes and regulations related to solid waste. The proposed Project would comply with the City of Los Angeles's Annual Report, CIWMP, the Los Angeles Municipal Code, and LAUSD BMPs.¹⁵⁹ For the construction phase, the site would comply with SC-USS-1 standards. For the operation and maintenance phase, the site would comply with SC-USS-3 standards. Additionally, the student population would remain comparable to the most recent 5 years of enrollment. As a result, the solid waste facility that services the site would continue to have adequate capacity. Therefore, LAUSD would comply with all federal, state, and local statutes and regulations related to solid waste during construction and operation of the proposed Project. No mitigation or further study is required.



¹⁵⁹ Ibid.

XX. WILDFIRE.

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Yes		🔀 No	
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				\boxtimes
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				\square
c. Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

Explanation:

Three of the SCs specified in the Program EIR are capable of avoiding or reducing impacts to related to potential wildfire impacts associated with the Project. Projects implemented under the SUP were determined in the Program EIR to result in less than significant impacts to wildland fire impacts, addressed in conjunction with hazards and hazardous materials, public services, and transportation.

LAUSD	LAUSD Standard Conditions of Approval					
SC-HAZ- 2	LAUSD shall determine the proximity of new classrooms or outdoor play areas to ensure that these new facilities are placed outside of the established exclusion zone.					
	Pipeline Safety Hazard Analysis					
	This document outlines the process for evaluating safety hazards associated with underground and above-ground natural gas and hazardous liquid pipelines. The pipeline safety hazard assessment (PSHA) process determines whether potential releases of natural gas, petroleum product and crude oil from pipelines located near a school site pose a safety risk to students and staff.					
SC-PS-1	If necessary, LAUSD shall: 1. Have local fire and police jurisdictions review all construction and site plans prior to the State Fire Marshall's final approval;					
	Provide a full site plan for the local review, including all buildings, both existing and proposed, fences, drive gates, retaining walls, and other construction affecting emergency vehicle access, with unobstructed fire lanes for access indicated.					

SC-T-4 LAUSD shall require its Construction Contractors to submit a Construction Worksite Traffic Control Plan to OEHS for review prior to construction. The plan will show the location of any haul routes, hours of operation, protective devices, warning signs, access to abutting properties and applicable transportation related safety measures as required by local and State agencies. LAUSD shall encourage its Construction Contractor to limit construction-related trucks to off-peak commute periods.

The Project site is located within the City of Los Angeles, within a Local Responsibility Area (LRA) – Incorporated regarding fire protection responsibility.¹⁶⁰ The Project site is not located within or near a State Responsibility Area (SRA) or very high fire hazard severity zone (VHFHSZ). The nearest SRA to the Project site is in Santa Fe Springs, located approximately 11 miles southeast of the Project site. The Project site is located within an LRA Non-VHFHSZ.¹⁶¹ As stated in Section XVI, *Public Services*, fire protection services are currently provided to Ascot ES by LAFD Station 21, located approximately 0.5 mile southwest of the Project site.¹⁶² Fire Station 21 staffs 48 firefighters and consists of one fire truck, one fire engine, one ambulance, and one squad.¹⁶³

According to Exhibit H, *Critical Facilities & Lifeline Systems*, of the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a City-selected disaster route or highway.¹⁶⁴ City-selected disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The selected disaster routes also provide a plan for interjurisdictional road reconstruction and rebuilding following a major disaster. The nearest City-selected disaster route to the Project site is Alameda Street, located approximately 0.5 mile east of the Project site.

Ascot ES has a Safe School Plan that identifies two emergency assembly areas on-site: a primary and a secondary evacuation route.¹⁶⁵ The primary evacuation route is from the eastern edge of the campus south on Compton Avenue for less than two blocks then east on E 46th Street for one block to the parking lot on the northern side of Fred Roberts Recreation Center. The secondary evacuation route is from the eastern edge of the campus north on Compton Avenue for just over five blocks to Ross Snyder Recreation Area at E 41st Street.

The Project site is located within the shallow-sloped Los Angeles basin, approximately 4.5 miles south of the nearest hill area (Dodger Stadium) west of the Los Angeles River channel. As stated in the Project Description, *Project Location*, the Project site is relatively flat, with an elevation range of 6 feet from the center and eastern portions of the campus to the southwestern portion of the 5.3-acre campus. Water on the Project site typically drains as a sheet flow to the south and west part of the site toward a lawn/turf area. According to the U.S.

¹⁶⁵ LAUSD School Operations – Emergency Services. September 12, 2016. Safe School Plan: Volume 2 – Emergency Procedures. Quick Reference Guide. Ascot Elementary. Available at: http://ascotavees-lausdca.schoolloop.com/file/1413464101506/4228615928749044812.pdf



¹⁶⁰ California Department of Forestry and Fire Protection (CAL FIRE), Fire and Resource Assessment Program (FRAP). November 7, 2007. Fire Hazard Severity Zones in SRA. Los Angeles County. Available at:

http://www.fire.ca.gov/fire_prevention/fhsz_maps_losangeles

¹⁶¹ Ibid.

¹⁶² City of Los Angeles. n.d. Neighborhood Fire Stations. Available at: http://www.lafd.org/fsloc.htm

¹⁶³ Montejano, Norma, Sapphos Environmental, Inc. January 11, 2019. Phone call with LAFD Station 21. Subject: Staff and Equipment at LAFD Station 21.

¹⁶⁴ Los Angeles Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Exhibit H, p. 61. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf. Accessed January 15, 2019.

Department of Homeland Security, Federal Emergency Management Agency (FEMA), and the Safety Element of the City of Los Angeles General Plan, the Project site is not located within a flood zone or flood hazard area.^{166,167,168} The Project site is not located within a City-identified high wind velocity area (it is not susceptible to high winds).¹⁶⁹ The Project site is predominantly paved, with landscaping concentrated around the perimeter of the Project site; along the chain-link fence north of Buildings 18, 20, and 23; and between Buildings 1, 2, and 4. There is no dense vegetation on the Project site; the trees and shrubs on the Project site are well spaced.

As shown in Exhibit D, *Selected Wildfire Hazard Areas,* in the Safety Element of the Los Angeles City General Plan, the Project site is not located within City-selected wildfire hazard areas including mountain fire districts, fire buffer zones, electrical transmission lines, industrialized areas, petrochemical complexes, natural gas transmission lines, underground natural gas storage facilities, areas of known shallow methane accumulation, or selected concentrations of post-1946 high rise buildings.¹⁷⁰ The Project site is located within the vicinity of one City-selected wildfire hazard area: natural gas distribution lines. According to the Southern California Gas Company's website, SoCalGas owned or operated high-pressure distribution lines (110–161 kilovolt) operated by Southern California Edison are located approximately 20 feet south and 9 feet west of the Project site, on the opposite side of the alley and on the sidewalk along Ascot Avenue.¹⁷² Additionally, one wooden electrical distribution line pole is located in the northwestern corner of the Project site (in the teacher parking lot). The Project site is surrounded by road surfaces, with existing paved streets to the north, east, southeast, and west, with an approximately 18-foot-wide paved alley to the south.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan in or near state responsibility areas or lands classified as VHFHSZ. The Project site is not located within or near an SRA or VHFHSZ. The Project site is an active elementary school campus with an existing Safe School Plan that designates evacuation routes north and sound along Compton Avenue to Fred Roberts Recreation Center and Ross Snyder Recreation Area. Although the administration building would be installed at another location on the Project site, the City's selected disaster routes and the two school designated evacuation routes would not be altered as a result of the proposed Project. During construction, a Construction Worksite Traffic Control Plan would be required (SC-T-4) to maintain applicable transportation related safety

¹⁶⁶ Los Angeles Department of City Planning. n.d. ZIMAS. Available at: http://zimas.lacity.org/. Accessed January 15, 2019.

¹⁶⁷ U.S. Department of Homeland Security, Federal Emergency Management Agency. n.d. FEMA Flood Map Service Center: Search by Address. Address: 1447 E. 45h Street, Los Angeles CA 90011. Available at: https://msc.fema.gov/portal/search?AddressQuery=1447%20e%2045th%20street%2C%20los%20angeles%20ca%2090011#sea

rchresultsanchor. Accessed January 15, 2019. ¹⁶⁸ Los Angeles Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Exhibit F, p. 57. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

¹⁶⁹ Los Angeles Department of City Planning. n.d. ZIMAS. Available at: http://zimas.lacity.org/. Accessed 15 January 2019.

¹⁷⁰ Los Angeles Department of City Planning. 1996. Safety Element of the Los Angeles City General Plan. Exhibit F, p. 57. Available at: https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

¹⁷¹ Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at: http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335. Accessed January 15, 2019.

¹⁷² California Energy Commission. 2016. Local Reliability Areas with Transmission Lines and Substations for 2016. Enlargement Area: Los Angeles. Available at: https://www.energy.ca.gov/maps/

measures as required by local and state agencies. SC-PS-2 would be implemented during operation to maintain emergency preparedness and response procedures at Ascot ES. During operation, the proposed Project would shift peak traffic during student drop-off from E 45th Street at Compton Avenue on the east side of the Project site to Ascot Avenue on the west side of the Project site as an indirect effect of relocating the main administration building towards the western side of the elementary school campus. The shift in peak traffic would reduce potential conflicts with evacuation routes that are currently located east of the Project site. Therefore, with incorporation of the SCs, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan in or near state responsibility areas or lands classified as very high fire hazard severity zones. No mitigation or further study is required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. The proposed Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire in or near state responsibility areas or lands classified as very high fire hazard severity zones. SC-HAZ-2 would be employed to ensure that there is existing separation between any hazardous materials, pipelines, and school facilities. The nearest natural gas pipelines are located immediately west of the Project site, below Ascot Avenue.¹⁷³ SC-PS-2 would be implemented during operation to further reduce potential impacts by maintaining emergency preparedness and response procedures at Ascot ES. The Project site is not located within or near an SRA or VHFHSZ. The Project site is relatively flat and not located within a City-identified high wind velocity area (it is not susceptible to high winds).¹⁷⁴ The Project site is a developed elementary school campus with implementation of the proposed Project. Moreover, the local fire code and Title 5 require the proposed Project to comply with these regulations.¹⁷⁵ Therefore, with incorporation of the SCs, the proposed Project would not exacerbate wildfire risks. No mitigation or further study is required.

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less than Significant Impact. The proposed Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in the temporary or ongoing impacts to the environment in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Project site is not located within or near an SRA or VHFHSZ. The Project site is a developed elementary school campus within an urbanized area in the Los Angeles basin and would continue to be an active elementary school campus with implementation of the proposed Project. The proposed Project would not require the installation or

 ¹⁷⁴ Los Angeles Department of City Planning. n.d. ZIMAS. Available at: http://zimas.lacity.org/. Accessed January 15, 2019.
 ¹⁷⁵ California Code of Regulations, Title 5, Section 14010[p].



¹⁷³ Southern California Gas Company. n.d. Natural Gas Pipeline Map. Available at:

http://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335. Accessed January 15, 2019.

maintenance of roads, fuel breaks, emergency water sources as the Project site is already served by this infrastructure. The proposed Project would involve the relocation of one electrical distribution line pole located on the northwestern corner of the Project site and replacement of utilities for the replacement buildings. The local fire code and Title 5 require the proposed Project to comply with these regulations.¹⁷⁶ The relocation of the distribution line pole would be conducted by Southern California Edison or a qualified contractor. Therefore, with incorporation of the SCs, the proposed Project would not exacerbate fire risk. No mitigation or further study is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The proposed Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes in or near state responsibility areas or lands classified as very high fire hazard severity zones. The Project site is not located within or near an SRA or VHFHSZ. The Project site is relatively flat, within the shallow sloped Los Angeles basin. As stated in Section X, *Hydrology and Water Quality*, the proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, the proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes in or near state responsibility areas or lands classified as very high fire hazard severity zones. No mitigation or further study is required.

¹⁷⁶ Ibid.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		\square		

Explanation:

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below selfsustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact. The proposed Project would result in less than significant impacts because the Project site is an existing elementary school campus located in an urbanized environment with minimal habitat and has been determined to not be eligible for historic significance (see Appendix A). Therefore, impacts would be less than significant, and no mitigation or further study is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact. The proposed Project is one of 22 school modernization projects evaluated in the SUP EIR. The SUP EIR identified potential significant and unavoidable impacts regarding air quality, cultural resources, noise, and transportation and traffic. As stated in in Section 4, the proposed Project would result in less than significant impacts in relation to environmental issue areas including air quality, cultural resources, pedestrian safety, and transportation and circulation; the proposed Project would result in less than significant impacts in relation to noise after implementation of mitigation measures due to close proximity to sensitive receptors. However, as the projects are dispersed throughout Los Angeles County, noise impacts from



the proposed Project in relation to other projects would not be considerable. The proposed Project would not contribute to a cumulatively considerable impact. Therefore, impacts would be less than significant, and no mitigation or further analysis is required.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant with Mitigation Incorporated. The proposed Project would result in potentially significant impacts regarding vibration to the nearest sensitive receptors, located on-site and approximately 18.2 feet south of the Project site at the nearest points. Groundborne vibration would be generated from the operation of heavy construction equipment at the Project site, which could potentially affect the existing sensitive land uses surrounding the site, as well as the students on the campus. Although the proposed Project would require compliance with SC-N-6 through SC-N-8, impacts would not be reduced to less than significant. The proposed Project would have the potential to impact the existing school buildings and surrounding offsite structures during construction because the construction equipment could be located within 15 feet of structures. Mitigation Measure Vibration-1 would reduce impacts regarding groundborne vibration to a less than significant level by use of smaller equipment (less than 300 horsepower) within 15 feet of existing school buildings when feasible.

Construction-related vibration could also annoy people within a nearby building. In order to exceed 78 VdB, a large bulldozer would need to be located as close as 50 feet from the structures. As stated above, the nearest residential structures are located within 18 feet from the Project site. Therefore, Project-related vibration levels of 78 VdB or greater would be experienced at offsite structures, and impacts would be potentially significant. Although the proposed Project would require compliance with SC-N-5, impacts would not be reduced to less-than-significant levels and mitigation would be required. Mitigation Measure Vibration-2 would reduce impacts regarding construction-related vibration to a less than significant level by use of smaller equipment (less than 300 horsepower) within 30 feet of occupied classrooms when feasible. Therefore, impacts would be less than significant after implementation of SCs and Mitigation Measures Vibration-1 and Vibration-2.

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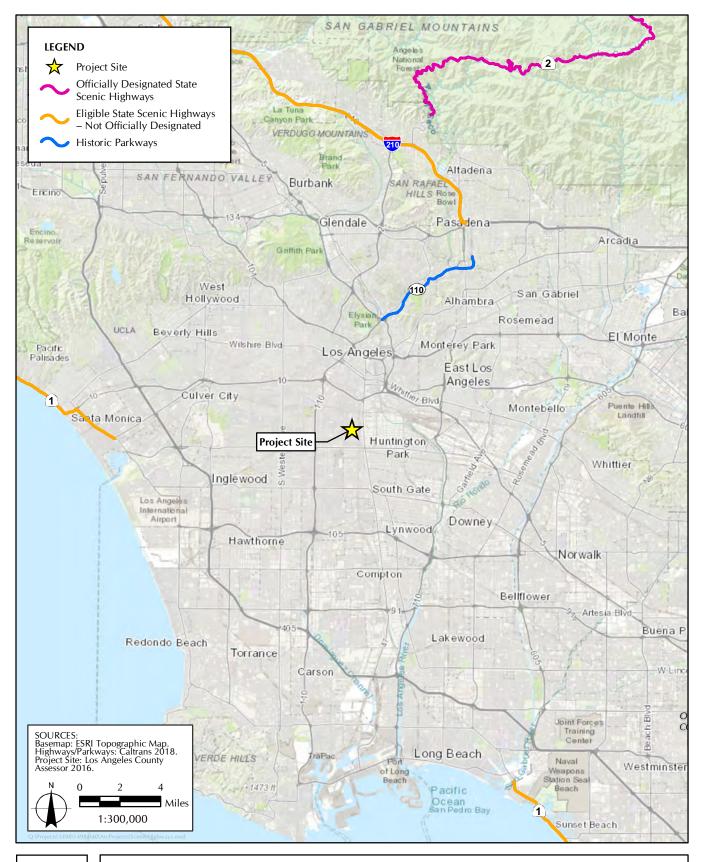
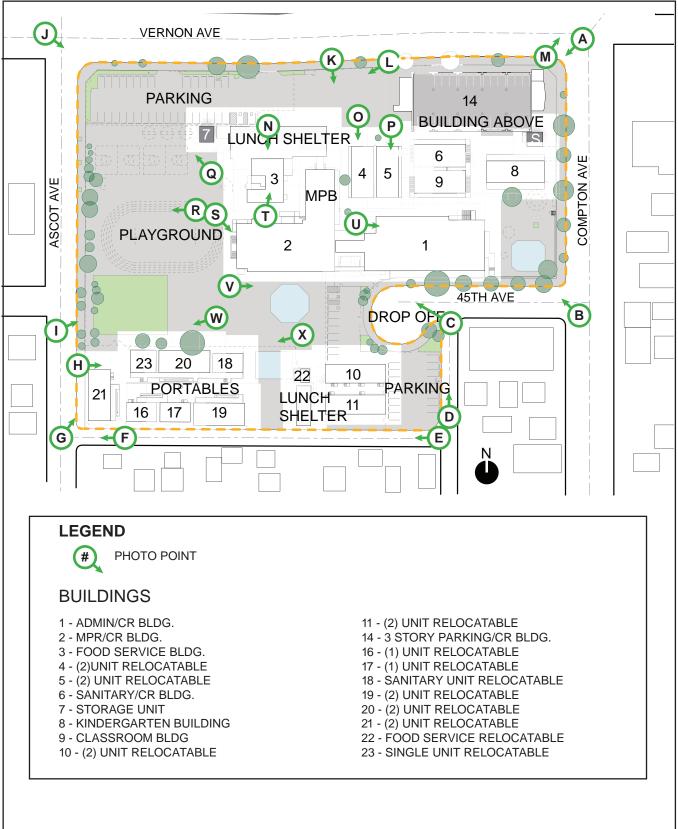




FIGURE 13 Scenic Highways

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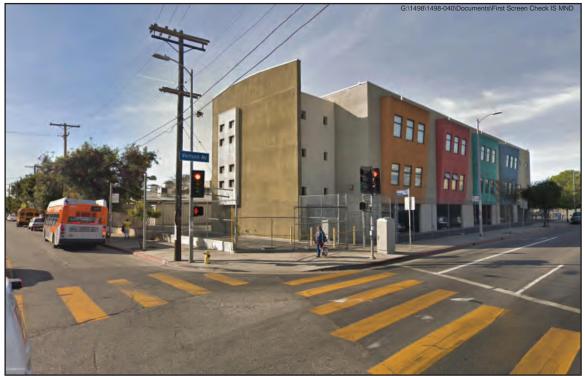




SOURCE: AC Martin Partners. July 9, 2018. Ascot Elementary Site Analysis Report - 10368157. Page 1-12, Summary of Facilities Conditions.



FIGURE 14 Project Area Photographs Map



ΡΗΟΤΟ Α

January 2018 Google Earth Image of Ascot ES (Building 14) from E. Vernon Ave. and Compton Ave. Facing Southwest

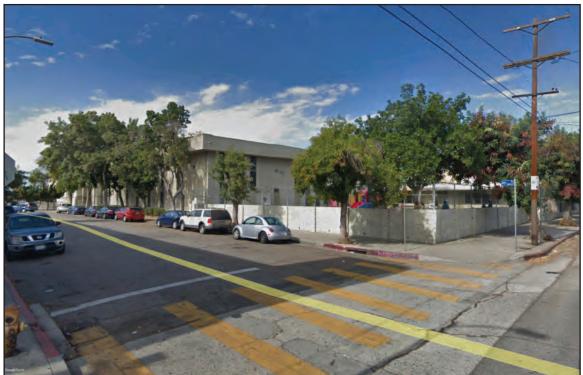


PHOTO B

November 2017 Google Earth Image of Ascot ES (Building 1) from Compton Ave. and E. 45th St. Facing Northwest





PHOTO C November 14, 2018 Photograph of Existing Buildings 1 and 2 from E. 45th St. Facing West-Northwest



PHOTO D November 14, 2018 Photograph of Alley East of Buildings 10 and 11 Facing North





PHOTO E November 14, 2018 Photograph of Alley South of Project Site Facing West



PHOTO F November 14, 2018 Photograph of Ascot Ave. and Alley South of Project Site Facing West







PHOTO G

January 2018 Google Earth Image of Project Site (Building 21) from Ascot Ave. and Alley South of Project Site Facing Northeast



РНОТО Н

November 14, 2018 Photograph of Rainbow Mural (Mural #7, Building 23) from Ascot Ave. Facing East





PHOTO I

January 2018 Google Earth Image of Southwest Corner of Ascot ES (Building 2) from Ascot Ave. Facing East-Northeast



РНОТО Ј

January 2018 Google Earth Image of Ascot ES (Buildings 2 and 3) from Vernon Ave. and Ascot Ave. Facing Southeast





РНОТО К

November 14, 2018 Photograph of Murals # 2 and #3 (Buildings 4 and 5) from Vernon Ave. Facing South



PHOTO L

November 14, 2018 Photograph of Lunch Shelter and Cafeteria (Building 3) from Vernon Ave. Facing Southwest





РНОТО М

November 14, 2018 Photograph from Northeast Corner of Project Site at E. Vernon Ave. and Compton Ave. Facing Northeast



PHOTO N

November 14, 2018 Photograph from Lunch Shelter Facing South Towards Mural #1 (Building 3)





PHOTO O November 14, 2018 Photograph of Mural #2 (Building 4) Facing South



PHOTO P November 14 ,2018 Photograph of Mural #3 (Building 5) Facing South





PHOTO Q November 14, 2018 Photograph of Basketball Courts and Teacher Parking Facing Northwest



PHOTO R November 14, 2018 Photograph of Ascot ES Playground Track, Fence, and Ascot Ave. facing West





PHOTO S November 14, 2018 Photograph of Mural #4 (Building 2) Facing Southeast

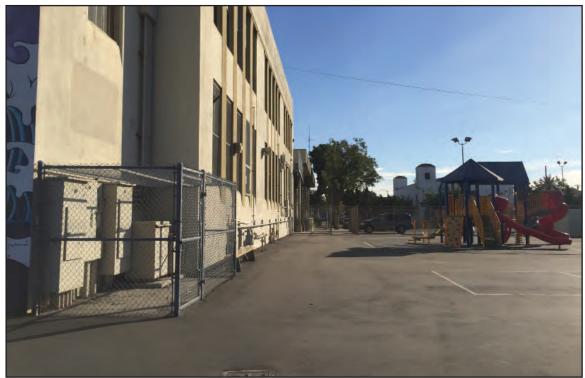


PHOTO T November 14, 2018 Photograph of Mural #5 (Building 3) Facing North





PHOTO U November 14, 2018 Photograph of Mural #6 (Building 1) Facing Southeast



ΡΗΟΤΟ V

November 14, 2018 Photograph of Building 2, Administrative Entrance Gate, Playground, and Teacher Parking Facing East





PHOTO W

November 14, 2018 Photograph of Trees and Fence Separating Ascot ES from Arco Iris Primary Center (Buildings 20 and 23) Facing Southwest



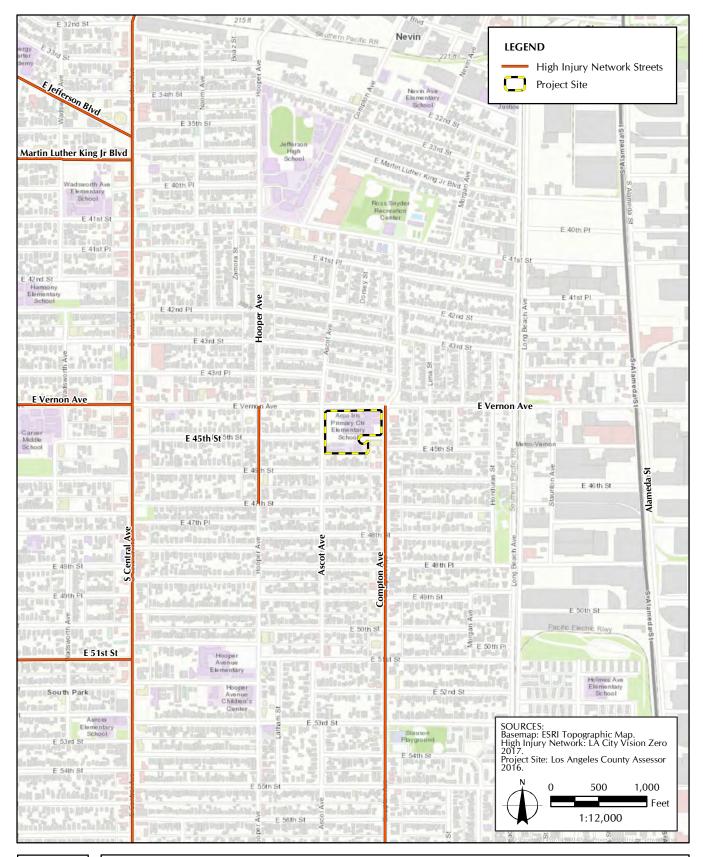
РНОТО Х

November 14, 2018 Photograph of Arco Iris Primary Center (Playground and Building 18) from Ascot ES Facing West-Southwest

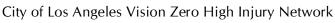


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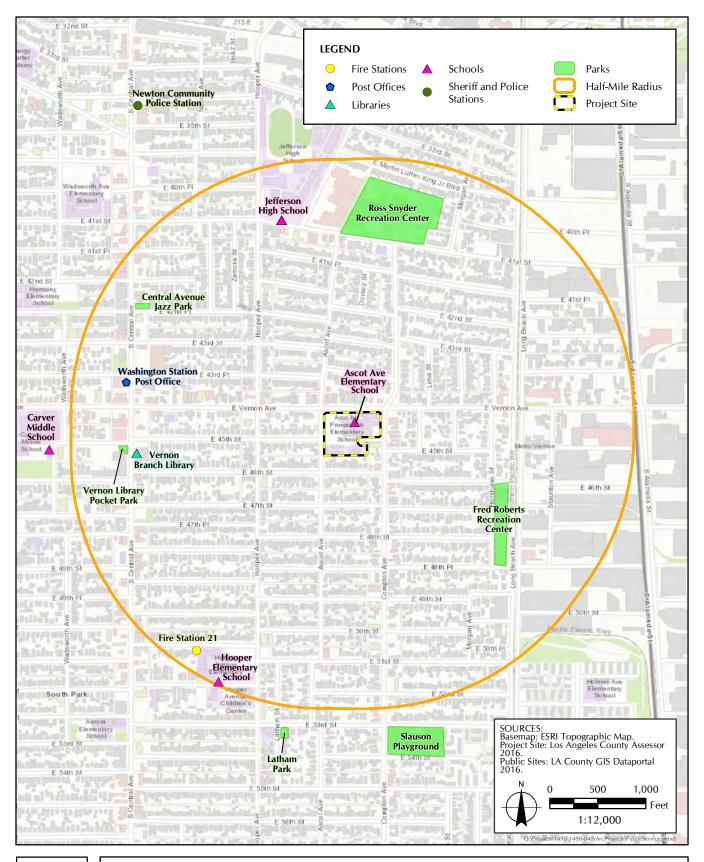




FIGURE 16

Public Services in the Vicinity of the Project Site

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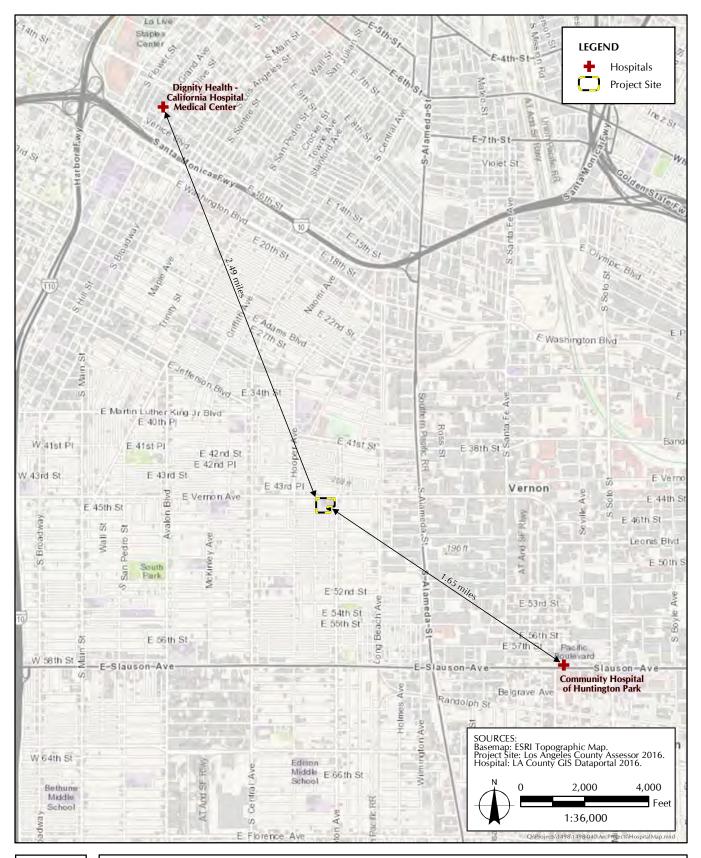




FIGURE 17 Acute Care Hospital Map

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Appendices

Appendices are on CD

- A. Historical Resources Evaluation Report
- B. Preliminary Environmental Assessment Equivalent
- C. Air Quality and Greenhouse Gas Emissions Background and Modeling Data
- D. Arborist Report
- E. Biological Resources Database Search Results
- F. Geotechnical Study
- G. Phase I Environmental Site Assessment
- H. Noise and Vibration Technical Memorandum
- I. Site Circulation Report
- J. Traffic and Pedestrian Safety Technical Memorandum

Appendices

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