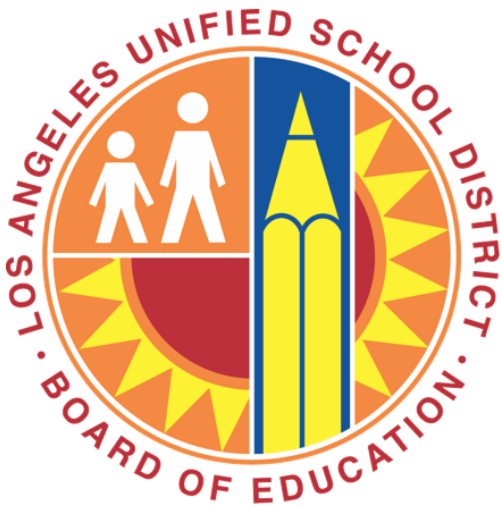


June 2019 | Responses to Comments and MMRP  
State Clearinghouse No. 2019039153



# ASCOT AVENUE ELEMENTARY SCHOOL

Comprehensive Modernization Project

*Prepared for:*

**Los Angeles Unified School District**  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21st Floor  
Los Angeles, California 90017  
Contact: Edward Paek, CEQA Project Manager  
213.241.4676

*Prepared by:*

Sapphos Environmental, Inc.  
430 North Halstead Street  
Pasadena, California 91107  
626.683.3547





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# 1. Introduction

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## 1.1 BACKGROUND

This document includes a compilation of the public comments received on the Ascot Avenue Elementary School Comprehensive Modernization Project Mitigated Negative Declaration (MND), supporting Initial Study, and provides Los Angeles Unified School District's (LAUSD's) responses to the comments.

Under the California Environmental Quality Act (CEQA), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND. Although Not Required, in the spirit of public disclosure and engagement, the LAUSD—as the lead agency for the Proposed Comprehensive Modernization Project—has responded to all written comments submitted during the 30-day MND public review period, which began March 28, 2019, and closed April 26, 2019.

## 1.2 PUBLIC ENGAGEMENT

The District circulated the MND for a 30-day public review period from March 28, 2019 to April 26, 2019. A CEQA Notice of Intent was published in two newspapers: the *Daily News* and *La Opinion*; mailed to approximately 1,973 addresses located within a quarter-mile radius with a flyer for the April 11, 2019 community meeting; e-mailed or mailed directly to interested parties, including but not limited to those who expressed interest during the preliminary research and design phase; sent home with Ascot Avenue Elementary School students; and posted at the school. The IS/MND was made available to the public for review at three different locations and on two websites.

The District filed the Notice of Intent with the Los Angeles County Clerk, sent copies of the Notice of Intent to the State Clearinghouse for distribution to potentially affected State agencies and delivered copies directly to local agencies, organizations, and known interested parties. Copies of the MND were available for review electronically on the OEHS website; hard copies were available for review at the District's OEHS, Ascot ES main office, and Vernon-Leon H. Washington Memorial Branch Library. A total of three agency comment letters were received after the public review period. No written comments from the community or individuals were received.

On April 11, 2019, a community meeting was held for the Ascot Avenue Elementary School Comprehensive Modernization Project (proposed project) from 6:00 p.m. to 8:00 p.m. The meeting was held during the 30-day public review period of the proposed MND and Preliminary Environmental Assessment Equivalent (PEA-E). The meeting was attended by 30 people, including 17 members of the community, nine Los Angeles Unified School District (LAUSD) staff, two Sapphos Environmental, Inc. staff, one Spanish language interpreter, and one representative from the City of Los Angeles 9th City Council District. The meeting was held in the

## 1. Introduction

Auditorium of the Ascot Avenue Elementary School campus at 1447 East 45th Street, Los Angeles, California 90011.

### 1.3 DOCUMENT FORMAT

This document is organized as follows:

***Section 1, Introduction.*** This section describes CEQA requirements and the content of this document.

***Section 2, Response to Comments.*** This section provides a list of agencies and interested persons commenting on the MND, copies of comment letters received during the public review period, and individual responses to written comments. To facilitate review of the responses, each comment letter has been reproduced and assigned a number. Individual comments have been numbered in each letter, and the letter is followed by responses from LAUSD with references to the corresponding comment number.

### 1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204 (b) outlines parameters for submitting comments on mitigated negative declarations and reminds persons and public agencies that the focus of review and comment of MNDs should be “on the proposed findings that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an MND is determined in terms of what is reasonably feasible. CEQA Guidelines Section 15204 (c) advises, “[re]viewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.”

Section 15204 (d) also states, “[e]ach responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204 (e) states, “[t]his section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required for MNDs; however, it is LAUSD’s policy to respond in writing to all comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the environmental document.

## 2. Response to Comments

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This section provides all written comments received on the circulated MND and supporting Initial Study and the District's response to each comment.

Letter Reference	Commenting Person / Agency	Date of Comment	Page Number
A	Gabrielino Band of Mission Indians – Kizh Nation	April 8, 2019	2-5
B	South Coast Air Quality Management District	April 23, 2019	2-11
C	Los Angeles County Metropolitan Transportation Authority	April 26, 2019	2-21
D	Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit	April 29, 2019	2-35
E	State of California Department of Transportation District 7	May 3, 2019	2-41
F	Community Meeting Comments	April 11, 2019	2-45

## 2. Response to Comments

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## 2. Response to Comments

LETTER A – Andrew Salas, Chairman, Gabrielino Band of Mission Indians – Kizh Nation

April 8, 2019

## 2. Response to Comments

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## 2. Response to Comments



### GABRIELENO BAND OF MISSION INDIANS - KIZH NATION

Historically known as The San Gabriel Band of Mission Indians  
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

#### **Notice of Intent to Adopt An Initial Study/ Mitigated Negative Declaration**

April 8, 2019

City of Los Angeles  
OEHS  
333 South Beaurdy Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017

Good Afternoon Edward Paek,

We have received your Notice of Intent to adopt a Negative Declaration for the Ascot Avenue Elementary School Comprehensive Modernization Project in the location of the Los Angeles County. Our Tribal Government would like to be consulted if any ground disturbance will be conducted for this project.

1

Sincerely,  
Gabrieleno Band of Mission Indians/Kizh Nation  
(1844) 390-0787 Office

Andrew Salas, Chairman  
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman  
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary  
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

[www.gabrielenoindians@yahoo.com](http://www.gabrielenoindians@yahoo.com)

[gabrielenoindians@yahoo.com](mailto:gabrielenoindians@yahoo.com)

## 2. Response to Comments

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## 2. Response to Comments

### 1. Response to Comments from Gabrielino Band of Mission Indians – Kizh Nation, dated April 8, 2019

#### Response to Comment A-1

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 proposed Project and 10 other LAUSD Comprehensive Modernization projects, along with notification for an additional Classroom Expansion project. One request for consultation on the proposed Project was received from Andrew Salas of the Gabrieleno Band of Mission Indians - Kizh Nation on January 9, 2019. The consultation date was set for March 21, 2019. LAUSD shall continue consultation with the Gabrieleno Band of Mission Indians/Kizh Nation regarding the proposed Project.

As required by LAUSD Standard Conditions of Approval for District Construction, Upgrade, and Improvement Project (SCs), **SC-CUL-10**, all construction work will stop when evidence of Native American resources is uncovered. 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 recordation and recovery of the resources.

## 2. Response to Comments

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## 2. Response to Comments

LETTER B – Lijin Sun, J.D., Program Supervisor, CEQA IGR, South Coast Air Quality Management District

April 23, 2019

## 2. Response to Comments

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## 2. Response to Comments



SENT VIA E-MAIL AND USPS:

April 23, 2019

[CEQA-comments@lausd.net](mailto:CEQA-comments@lausd.net)

Edward Paek, CEQA Project Manager  
Los Angeles Unified School District  
Office of Environmental Health and Safety  
333 South Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017

### **Mitigated Negative Declaration (MND) for the Proposed Ascot Avenue Elementary School Comprehensive Modernization Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

#### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to modernize Ascot Avenue Elementary School, demolish 59,836 square feet of existing academic buildings, remodel 45,895 square feet of existing academic buildings, and construct 63,773 square feet of classrooms and administrative buildings on 5.3 acres (Proposed Project). The Proposed Project is located at 1447 East 45th Street on the southwest corner of East Vernon Street and Compton Avenue in the community of Southeast Los Angeles. Upon a review of the MND and aerial photographs, South Coast AQMD staff found that residential units are within 18 feet<sup>1</sup> of the Proposed Project, and students are expected to be on-site during construction<sup>2</sup>. Construction is anticipated to begin in 2021 and will be completed by December 2025 with peak construction expected to occur during summer breaks<sup>3</sup>. After conducting a Preliminary Environmental Assessment Equivalent, the Lead Agency found that soil at Proposed Project site is impacted with lead. As such, 2,000 cubic yards of impacted soil are expected to be removed when students and staff are not present<sup>4</sup>.

#### South Coast AQMD Staff's Summary of Air Quality Analyses

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional and localized construction and operational air quality impacts would be less than significant<sup>5</sup>. Due to the soil remedial activities that will take place, the Lead Agency incorporated a discussion of compliance with South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>6</sup>.

#### South Coast AQMD Staff's General Comments

Upon a review of the MND and Appendix C: Air Quality and Greenhouse Gas Emissions Background and Modeling Data, South Coast AQMD staff found inconsistencies between the information presented in

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<sup>1</sup> MND, Section 2: Environmental Setting "Surrounding Land Use", Page 9.

<sup>2</sup> MND, Section 3: Project Description "Construction Phasing and Equipment", Page 41.

<sup>3</sup> *Ibid.*

<sup>4</sup> MND, Section 3: Project Description "Proposed Project: Preliminary Environmental Assessment Equivalent (PEA-E)", Page 39.

<sup>5</sup> MND, Section 4: Environmental Checklist and Analysis "Air Quality", Pages 65-72.

<sup>6</sup> South Coast AQMD Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminates. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

## 2. Response to Comments

Edward Paek

April 23, 2019

the main body of the MND and the modeling assumptions used to calculate the Proposed Project's construction emissions. These inconsistencies may have led to an underestimation of the Proposed Project's construction emissions. To ensure that the Proposed Project's construction impacts will not result in adverse impacts to sensitive receptors who will be on-site (e.g., students and teachers) during construction and those who live in close proximity to the Proposed Project, South Coast AQMD staff recommends that the Lead Agency correct these inconsistencies to ensure that the regional and localized emissions from the Proposed Project are accurately accounted for and used to determine the significance levels of the Proposed Project's air quality impacts. Please see the attachment for more information. The attachment also includes a list of recommended mitigation measures as resources to the Lead Agency. South Coast AQMD staff recommends consultation with South Coast AQMD Permitting and Engineering staff before any remedial on-site activities occur.

1

### Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

2

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
LS:AM  
LAC190402-11  
Control Number

## 2. Response to Comments

Edward Paek

April 23, 2019

### ATTACHMENT

#### Air Quality Impacts – Modeling Assumptions

1. Upon a review of the main body of the MND and the CalEEMod output file in Appendix C, South Coast AQMD staff found inconsistencies between the modeling parameters in the MND and what was modeled for construction emissions in CalEEMod. For example, in the main body of the MND the Lead Agency stated that the Proposed Project's construction activities would include an estimated 15,000 – 18,000 cubic yards of soil import/export to be hauled to and from the site<sup>7</sup>; however, only 450 cubic yards of soil export was modeled in CalEEMod to calculate the emissions<sup>8</sup>. South Coast AQMD staff recommends that the Lead Agency revise the modeling based on 18,000 cubic yards of soil import/export to analyze a worst-case construction impact scenario that is reasonably foreseeable for the Proposed Project, or provide additional information to justify the use of 450 cubic yards of soil export in the Final MND.
2. Table 4, *Anticipated Construction Equipment*, in the main body of the MND provided a project-specific list of anticipated construction equipment and vendor trips that would occur during each phase of the Proposed Project's construction<sup>9</sup>. However, the information provided in Table 4 did not match what was modeled in CalEEMod (see Table A and Table B for comparison).

**Table A: South Coast AQMD Staff's Copy of Table 4: Anticipated Construction**

TABLE 4 ANTICIPATED CONSTRUCTION EQUIPMENT			
Phase 1 & 2	Schedule	Equipment	Maximum Number/Day
Demolition/Interim Housing/Modernization (i.e., Building Interiors)	3 months	Excavators w/breaker	1
		Loader	1
		Bobcat/Skip	1
		Crushing Equipment	1
		Water Truck	1
		Building Debris haul trips: average 10 CY end-dump trucks	10
Site Prep/Modernization	3 months	Asphalt/Concrete Debris haul trips: average 10 CY end-dump trucks	10
		Jack Hammers/Air Compressor	2
		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
		Concrete Trucks	5
		Impact Pile Driver, Sonic Pile Driver, Crane-Mounted Auger Drill, or Crane-Suspended Downhole Vibrator	1
		Concrete Pump	1
		Crane	1
Dump Trucks	2		
Building Construction/Modernization	12 months	Fork Lifts/Gradalls	4
		Delivery Trucks	12
		Backhoes	2
		Air Compressor	1
		Skip Loaders	2
		Roller	1
		Paver	1
		Asphalt Trucks	8
Asphalt Paving and Off-Site Street Work	3 months	Water Truck	1
			1

**Total Vendor Trips: 28**

<sup>7</sup> MND, Section 3: Project Description "Construction Phasing and Equipment". Page 41.

<sup>8</sup> MND, Appendix C: Air Quality and Greenhouse Gas Emissions Background and Modeling Data "CalEEMod Output" Page 78.

<sup>9</sup> MND, Section 3: Project Description "Construction Phasing and Equipment". Page 42-43.

## 2. Response to Comments

Edward Paek

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**Table B: South Coast AQMD Staff's Copy of CalEEMod Output File:  
Off-road Construction Equipment and Trips and VMT**

4

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Demolition	Excavators	3	8.00	158	0.38
Demolition	Rubber Tired Dozers	2	8.00	247	0.40
Paving	Pavers	2	8.00	130	0.42
Paving	Paving Equipment	2	8.00	132	0.36
Paving	Rollers	2	8.00	80	0.38
Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Building Construction	9	150.00	10.00	12.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Demolition	6	150.00	0.00	20.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	6	150.00	0.00	9.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	7	150.00	0.00	35.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

**Total Vendor Trips: 10**

To illustrate, South Coast AQMD staff has highlighted one of the inconsistencies between construction equipment and the CalEEMod output file. As shown in Table A<sup>10</sup> and Table B<sup>11</sup>, the Lead Agency estimated 28 vendor trips throughout four construction phases; however, only 10 vendor trips for the building construction phase were modeled to calculate emissions, and no vendor trips for the demolition, site preparation, and paving phases were included to calculate emissions. Additionally, the brackets in Tables A and B point to other areas of inconsistencies, in terms of type and amount of off-road equipment, that South Coast AQMD staff found between Table 4 in the MND, and that in the CalEEMod output files. These inconsistencies may have led to an underestimation of the Proposed Project's regional and localized construction emissions. Therefore, South Coast AQMD staff recommends that the Lead Agency correct the inconsistencies between the main body of the MND and the modeling assumptions to ensure that emissions from the Proposed Project are accurately accounted for and used to determine the levels of significance for the Proposed Project's regional and localized air quality impacts in the Final MND.

<sup>10</sup> *Ibid.*

<sup>11</sup> MND, Appendix C: Air Quality and Greenhouse Gas Emissions Background and Modeling Data "CalEEMod Output" Page 85.

## 2. Response to Comments

Edward Paek

April 23, 2019

### Recommended Mitigation Measures

3. In the event that the Lead Agency finds, after revisions to the Air Quality Analysis based on Comment Nos. 1 and 2, that the Proposed Project's regional and/or localized construction emissions would be significant, identification and implementation of feasible mitigation measures would be required under CEQA. South Coast AQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist the identification of feasible mitigation measures for incorporation in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website<sup>12</sup>.

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#### *Mitigation Measures for Construction Air Quality Impacts*

- Use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions. A list of CARB verified DPFs are available on the CARB website. Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.
- Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

<sup>12</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

## 2. Response to Comments

Edward Paek

April 23, 2019

- Require the use of zero-emissions or near-zero emission on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO<sub>x</sub> emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NO<sub>x</sub> emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate. Require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.
- Restrict non-essential diesel engine idle time, to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

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### Compliance with South Coast AQMD Rules & Permits

4. If on-site soil remediation or any on-site activity would involve equipment or operations that either emits or controls air pollution, South Coast AQMD Engineering and Permitting staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to the start of any remedial activities or operations. In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. Emissions from permitted equipment should be quantified and added to the Proposed Project's construction and operational emissions, where applicable, to determine the level of significance in the Final MND. Any assumptions in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits. If there is any information in the permitting process and/or during implementation of remediation activities suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final MND or substantially more severe air quality impacts than those analyzed in the Final MND, the Lead Agency should commit to reevaluating the Proposed Project's air quality impacts through a CEQA process (CEQA Guidelines Section 15162). For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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## 2. Response to Comments

### 2. Response to Comments from South Coast Air Quality Management District, dated April 23, 2019

#### Response to Comment B-1

Thank you for your comment. The modeling methodology has been reviewed, and the noted inconsistencies have been corrected to ensure that the regional and localized emissions from the proposed Project are accurately accounted for. The overall construction-related daily emissions for the criteria pollutants remain below SCAQMD daily thresholds for significance after adjusting the modeling parameters.

LAUSD will consider the SCAQMD's recommended mitigation measures and recommendation for consultation prior to remedial on-site activities during its decision-making process.

#### Response to Comment B-2

LAUSD as Lead Agency under CEQA will consider all comments received during the public review period. LAUSD will provide SCAQMD with written responses to all comments prior to adoption of the Final MND.

#### Response to Comment B-3

The model has been rerun using CalEEMod to address the noted inconsistencies. Table 5, *Estimated Daily Construction Emissions (Unmitigated)*; Table 6, *Estimated Daily Construction Emissions (Mitigated)*; and Appendix C, *Air Quality and Greenhouse Gas Emissions Background and Modeling Data*, have been revised accordingly. After rerunning the model, the proposed Project's construction activities would remain compliant with the SCAQMD threshold of significance using the estimation of 18,000 cubic yards of soil import/export to the Project site.

#### Response to Comment B-4

The model has been rerun using CalEEMod to reflect the project-specific equipment listed in the IS/MND. Appendix C, *Air Quality and Greenhouse Gas Emissions Background and Modeling Data*, has been revised accordingly.

#### Response to Comment B-5

The proposed project's regional and/or localized construction emissions are not significant after revisions to the air quality analysis.

#### Response to Comment B-6

The comment advises consultation with SCAQMD engineering and permitting staff prior to remedial activities or operations to determine whether or not any permits or plans are required to be filed and approved by SCAQMD. The following language has been added to the Air Quality and Hazards and

## 2. Response to Comments

Hazardous Materials sections of the MND for clarification based on the findings of the preliminary environmental assessment equivalent (PEA-E) report:

Projects that involve earth-moving activities of more than 50 cubic yards of soil that contain identified toxic air contaminants (TACs) are subject to South Coast Air Quality Management (SCAQMD) Rule 1466. As the Project would involve earth-moving activities of more than 50 cubic yards, LAUSD would sample and test soils for the presence of TACs to determine if the Project is subject to SCAQMD Rule 1466. If TACs are found, LAUSD shall comply with all relevant and appropriate requirements of SCAQMD Rule 1466. Therefore, impacts would be less than significant.



## 2. Response to Comments

LETTER C – Shine Ling, Manager, Transit Oriented Communities, Los Angeles County Metropolitan Transportation Authority

April 26, 2019

## 2. Response to Comments

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## 2. Response to Comments



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

April 26, 2019

Edward Paek  
CEQA Project Manager  
Los Angeles Unified School District  
333 South Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017  
Sent by Email: ceqa-comments@lausd.net

RE: 1447 East 45<sup>th</sup> St. – Ascot Avenue Elementary School Comprehensive Modernization Project  
Notice of Intent to Adopt an Initial Study (IS) / Mitigated Negative Declaration (MND)

Dear Mr. Paek:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Ascot Avenue Elementary School Comprehensive Modernization Project (Project) located at 1447 East 45<sup>th</sup> Street in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the Project Sponsor with the Metro Adjacent Development Handbook (attached), a resource guide which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW) and bus stops. These documents and additional resources are available at [www.metro.net/projects/devreview](http://www.metro.net/projects/devreview).

### Project Description

The proposed Project is adjacent to Metro Bus Lines 105, 55, 355, and 611, and includes the demolition and removal of 18 relocatable buildings and permanent building and structures (approximately 59, 836 square feet) and construction of approximately 63,773 square feet of new classroom and administrative buildings, new playground areas and parking areas; and modernization of the existing buildings. Other improvements include upgrades to campus-wide infrastructure, including domestic water, fire, irrigation, gas, sewer, low voltage (e.g., fire, telephone, data), electrical and storm drainage, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, and exterior paint.

## 2. Response to Comments

1447 East 45<sup>th</sup> St  
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### Preliminary Comments

#### *Bus Stop Adjacency*

1. **Service:** Metro Bus Lines 105, 55, 355, and 611, operate on Vernon Avenue and Compton Avenue, adjacent to the proposed Project. Three Metro Bus stop(s) are directly adjacent to the proposed Project at Vernon Avenue and Compton Avenue. Other transit operators may provide service in this area and should be consulted. 1
2. **Final Bus Stop Condition:** The existing Metro bus stops must be maintained as part of the final Project. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of the bus stop and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the bus stop from the proposed development. 2
3. **Impact Analysis:** With an anticipated increase in traffic during and after construction, Metro encourages any impact analysis to include potential effects on the Metro Bus Lines. Potential impacts could include construction traffic, operation of and shipment/deliveries to the completed Project, and temporary or permanent bus service rerouting. 3
4. **Driveways:** Driveways accessing parking and loading at the Project site should be located away from transit stops, and be designed and configured to avoid potential conflicts with on-street transit services and pedestrian traffic to the greatest degree possible. Vehicular driveways should not be located in or directly adjacent to areas that are likely to be used as waiting areas for transit. 4
5. **Bus Stop Access & Enhancements:** Metro encourages the installation of bus shelters with benches, wayfinding signage, and enhanced crosswalks that must be ADA-compliant, as well as pedestrian lighting and shade trees in paths of travel to access bus stops and other amenities that improve safety and comfort for transit riders. The City should consider requesting the installation of such amenities as part of the development of the site. 5
6. **Bus Operations Contacts:** Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating construction activities. Other municipal buses may also be impacted and should be included in construction outreach efforts. 6

### Transit Orientation

Considering the Project's proximity to Metro bus stops, Metro would like to identify the potential synergies associated with transit-oriented development:

1. **Land Use:** Metro supports development of commercial and residential properties bus stops and understands that increasing development near bus stops represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of developments. Metro encourages the City and Project Sponsor to be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the stop. 7
2. **Transit Connections:** Given the Project's proximity to the Metro bus stops, the Project design should consider and accommodate transfer activity between bus and bus lines that will occur 8

## 2. Response to Comments

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- along the sidewalks and public spaces. Metro recently completed the Metro Transfers Design Guide, a best practice document on transit improvements. This can be accessed online at <https://www.metro.net/projects/systemwidedesign>. 8
3. **Walkability:** Metro strongly encourages the installation of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops. The City should consider requiring the installation of such amenities as part of the conditions of approval for the Project. 9
4. **Access:** The Project should address first-last mile connections to transit, encouraging development that is transit accessible with bicycle and pedestrian-oriented street design connecting transportation with housing and employment centers. For reference, please view the First Last Mile Strategic Plan, authored by Metro and the Southern California Association of Governments (SCAG), available on-line at: [http://media.metro.net/docs/sustainability\\_path\\_design\\_guidelines.pdf](http://media.metro.net/docs/sustainability_path_design_guidelines.pdf). 10
5. **Active Transportation:** Metro encourages the City to work with the Project Sponsor to promote bicycle use through adequate short-term bicycle parking, such as ground-level bicycle racks, as well as secure and enclosed long-term bicycle parking, such as bike lockers or a secured bike room, for guests, employees, and residents. Bicycle parking facilities should be designed with best practices in mind, including: highly visible siting, effective surveillance, easy to locate, and equipment installed with preferred spacing dimensions, so they can be conveniently accessed. Additionally, the Project Sponsor should help facilitate safe and convenient connections for pedestrians, people riding bikes, and transit users to/from the Project site and nearby destinations. 11
6. **Wayfinding:** The Project is also encouraged to support these connections with wayfinding signage inclusive of all modes of transportation. Any temporary or permanent wayfinding signage with content referencing Metro services, or featuring the Metro brand and/or associated graphics (such as bus or rail pictograms) requires review and approval by Metro Art & Design. Please contact Lance Glover, Senior Manager of Signage and Environmental Graphic Design, at 213-922-2360 or [GloverL@metro.net](mailto:GloverL@metro.net). 12
7. **Multi-modal Connections:** With an anticipated increase in traffic, Metro encourages an analysis of impacts on non-motorized transportation modes and consideration of improved non-motorized access to the Project and nearby transit services, including pedestrian connections and bike lanes/paths. Appropriate analyses could include multi-modal LOS calculations, pedestrian audits, etc. 13
8. **Parking:** Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements for specific areas and the exploration of shared parking opportunities. These strategies could be pursued to reduce automobile-orientation in design and travel demand. 14
9. **Transit Pass:** Metro would like to inform the Project Sponsor of Metro's employer transit pass programs including the Annual Transit Access Pass (A-TAP) and Student Transit Access Pass programs which offer efficiencies and group rates that schools can offer employees as an 15

## 2. Response to Comments

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incentive to utilize public transit. For more information on these programs, contact Devon Deming at 213-922-7957 or [DemingD@metro.net](mailto:DemingD@metro.net).

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### *Congestion Management Program*

Beyond impacts to Metro facilities and operations, Metro must also notify the Project Sponsor of state requirements. A Transportation Impact Analysis (TIA), with roadway and transit components, is required under the State of California Congestion Management Program (CMP) statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County," Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

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1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed Project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed Project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the Project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Eddi Zepeda by phone at 213-418-3484, by email at [DevReview@metro.net](mailto:DevReview@metro.net), or by mail at the following address:

Metro Development Review  
One Gateway Plaza MS 99-22-1  
Los Angeles, CA 90012-2952

Sincerely,

  
Shine Ling, AICP  
Manager, Transit Oriented Communities

### Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>
- CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

## 2. Response to Comments

### 3. Response to Comments from Los Angeles County Metropolitan Transportation Authority, dated April 26, 2019

#### Response to Comment C-1

The comment identifies Metro transit lines that operate on Vernon Avenue and Compton Avenue, adjacent to the project site (please see Table 2-1, *Existing Transit Routes*; and Figure 2-1, *Existing Transit Routes*). A full summary of transit service within the vicinity of the proposed Project has been included in the IS/MND (Table 2-1 and Figure 2-1).

**TABLE 2-1  
EXISTING TRANSIT ROUTES**

Route	Destinations	Roadway(s) near Site	No. of Buses/Trains during Peak Hour		
			DIR	AM	PM
Metro 55, 355	Willowbrook to Downtown Los Angeles via Watts, Los Angeles	Vernon Avenue, Compton Avenue, 46th Street	NB	8	5
			SB	4	6
Metro 105	West Hollywood to Vernon via Beverly Hills, Los Angeles, Leimert Park	Vernon Avenue, Ascot Avenue, Compton Avenue	EB	4	4
			WB	4	4
Metro 611	Cudahy to Maywood via Huntington Park, Florence, Los Angeles, Vernon	Vernon Avenue, Compton Avenue, 46th Street	NB	2	1
			SB	2	2
Metro 705	West Hollywood to Vernon via Beverly Hills, Los Angeles, Leimert Park	Vernon Avenue	EB	5	5
			WB	7	5
Metro Blue 801	Long Beach to Downtown Los Angeles via Carson, Compton, Willowbrook, Watts, Florence, Los Angeles	Vernon Blue Line Station	NB	5	5
			SB	5	5
Dash Southeast	37th and Grand circular to Exposition Park via South Figueroa Corridor, Central Alameda, South Park, South Los Angeles, Vermont Harbor	Vernon Avenue, Compton Avenue	NB	3	3
			SB	3	3
Total				52	48

**SOURCE:**

Los Angeles County Metropolitan Transportation Authority (Metro), City of Los Angeles Department of Transportation (LADOT) websites, 2019.





## 2. Response to Comments

Extensive public bus and rail transit service are provided within the proposed Project study area. Public bus transit service is currently provided by Metro and LADOT DASH Transit Service. The Metro Blue Line is also provided in close proximity to the Project site. Metro's nearest Blue rail line station is located approximately one-quarter mile east of the site, at the Vernon Station located at 4421 Long Beach Avenue. As noted previously, a summary of the existing transit service, including the transit route, destinations and peak hour headways is included as Table 5.3-1, and the existing public transit routes are illustrated in Figure 5.3-1. In addition, the existing public transit stops adjacent to the Project site are noted in Figure 2 of the Pedestrian and Safety Study. This comment provides general information and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project.

LAUSD shall consult with Metro and LADOT during development of the Project design to ensure that bus service is not interrupted as a result of the proposed Project. This would be conducted as part of **SC-T-4** (coordination with the local jurisdiction to agree on implementation of SR2S, traffic control and pedestrian safety devices).

### **Response to Comment C-2**

The comment outlines the conditions associated with the final bus stop. This comment provides general information regarding bus stop conditions and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. In addition, any existing bus stops along the Project frontage that are temporarily relocated during construction would be fully restored upon Project completion.

As shown in Figure 5.3-1, Existing Transit Routes, in response to Comment C-1, the existing bus stops adjacent to the Project site are located on Vernon Avenue near the northwestern portion of the campus and Compton Avenue near the northeastern portion of the campus. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School or replacement of bus stops. The proposed Project would involve resurfacing the Ascot Avenue Elementary School campus to be ADA-compliant and replacing the teacher parking lot in the northwestern corner of the campus along Vernon Avenue with classrooms. The campus would continue to be surrounded with a perimeter fence after Project completion.

### **Response to Comment C-3**

The comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. A detailed Construction Traffic Management Plan shall be prepared in coordination with LADOT and the Department of Building and Safety, including any street or sidewalk closure information, detour plans, haul routes and staging plans (**SC-T-4**). Any temporary relocations of existing bus stops would also be outlined and would be required to be restored upon Project completion.

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The impacts during construction have been fully analyzed in the IS/MND. Construction traffic is summarized on pages 5 through 12 of the Pedestrian and Safety Study (Appendix J of the MND). It was determined that the Project-specific construction-related traffic would be significantly less than the daily operations of the Ascot Avenue Elementary School.

### **Response to Comment C-4**

As shown in Figure 3 of the Pedestrian and Safety Study contained within Appendix J of the IS/MND, vehicular movements into and out of the proposed Project site is planned to be provided via the cul-de-sac of 45th Street and Ascot Avenue due to the relocation of the surface parking lot at the northwest corner of the site to the southern portion of the campus. Thus, since no driveways are planned along the Compton Avenue frontage (similar to existing conditions) and no new driveways are proposed along the Vernon Avenue frontage, no interference with existing bus transit stops is expected to occur as a result of the Project.

### **Response to Comment C-5**

The commenter requests that the District consider bus stop enhancements as part of the Conditions of Approval. This comment provides general information regarding bus stop enhancement examples and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. Mitigation may only be required when there is a direct nexus to a significant impact. Since there is no impact on public transit, there is no justification for requiring the bus stop enhancement. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project.

### **Response to Comment C-6**

This comment provides general information regarding Metro contacts to be contacted in advance of the Project's construction activities. As such, it is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project.

### **Response to Comment C-7**

The commenter encourages the Project sponsor to be mindful of the Project's proximity to the bus stop, including orienting pedestrian pathways towards the stop. As shown in Figure 5.3-1, Existing Transit Routes, in response to Comment C-1, the existing bus stops adjacent to the Project site are located on Vernon Avenue near the northwestern portion of the campus and Compton Avenue near the northeastern portion of the campus. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School or replacement of bus stops. The proposed Project would involve resurfacing the Ascot Avenue Elementary School campus to be ADA-compliant and replacing the teacher parking lot in the northwestern corner of the campus along Vernon Avenue with classrooms. The campus would continue to be surrounded with a perimeter fence after Project completion, with gated entrances to the school providing controlled access. As stated in Section 3.2,

## 2. Response to Comments

Proposed Project, of the MND, the proposed Project would include site-wide programmatic access upgrades to comply with ADA and new fencing and gates. As with the existing condition, the proposed Project would limit pedestrian access to the campus for security, which would be concentrated along Ascot Avenue and E 45th Street (not adjacent to the existing bus stops).

### **Response to Comment C-8**

This comment provides general information regarding bus and bus line transfer activity and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School or replacement of bus stops.

### **Response to Comment C-9**

This comment provides general information regarding walkability and sidewalk amenities and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School.

### **Response to Comment C-10**

This comment provides general information regarding access (first-last mile connections to transit) and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School. Pedestrian access to the campus would continue to be provided at E 45th Street and Ascot Avenue.

### **Response to Comment C-11**

This comment provides general information regarding active transportation and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The Project would not encourage driving over other modes. Where feasible, additional bike racks would be installed to provide more opportunities for alternative means of transportation. The exact type and quantities for these facilities will be provided per the LAUSD School Design Guide and finalized as the Project design is refined and finalized.

### **Response to Comment C-12**

This comment provides general information regarding multi-modal transportation wayfinding and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. As such, the

## 2. Response to Comments

comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The proposed Project would be limited to LAUSD property and not involve replacement of the sidewalk surrounding Ascot Avenue Elementary School.

### **Response to Comment C-13**

This comment encourages an analysis of multi-modal transportation modes, including multi-modal LOS calculations and pedestrian audits. As stated in Section 3.2, Proposed Project, of the MND, the proposed Project would not increase the current capacity of the Ascot ES campus. As stated in Section XIV, Pedestrian Safety, of the MND, 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 **-SC-PED-2, SC-PED-3, SC-PED-4, and SC-T-4** would be required to minimize pedestrian safety risks to students.

### **Response to Comment C-14**

This comment encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements. LAUSD staff currently utilize the existing parking and would continue to utilize the replacement parking, with weekend opportunities for nearby businesses and churches to utilize the parking on the weekends via the Civic Center permit process.

### **Response to Comment C-15**

This comment provides general information regarding Metro's employer transit pass programs and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. The proposed Project evaluates a proposed physical change to the Ascot Avenue Elementary School campus and does not address programs. The proposed Project has no unresolved significant impact on employee transportation; therefore, there is no nexus for evaluating the Annual Transit Access Pass (A-TAP) and Student Transit Access Pass programs in conjunction with the proposed Project.

### **Response to Comment C-16**

The Pedestrian and Safety Study in Appendix J of the IS/MND includes a discussion of the Project impacts related to the Congestion Management Plan (CMP) roadway facilities, consistent with the comment. The commenter is referred to page 10 of the Pedestrian and Safety Study for this detailed discussion. As discussed, the Project would not contribute enough traffic to CMP roadway facilities to trigger the need for a Traffic Impact Analysis (TIA), and no further analysis is required.

### **Response to Comment C-14**

This comment encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements. LAUSD staff currently utilize the existing parking and would continue to utilize the replacement parking, with weekend

## 2. Response to Comments

opportunities for nearby businesses and churches to utilize the parking on the weekends via the Civic Center permit process.

### **Response to Comment C-15**

This comment provides general information regarding Metro's employer transit pass programs and is not a direct comment on environmental issues, or the content or adequacy of the IS/MND. The proposed Project evaluates a proposed physical change to the Ascot Avenue Elementary School campus and does not address programs. The proposed Project has no unresolved significant impact on employee transportation; therefore, there is no nexus for evaluating the Annual Transit Access Pass (A-TAP) and Student Transit Access Pass programs in conjunction with the proposed Project.

### **Response to Comment C-16**

The Pedestrian and Safety Study in Appendix J of the IS/MND includes a discussion of the Project impacts related to the Congestion Management Plan (CMP) roadway facilities, consistent with the comment. The commenter is referred to page 10 of the Pedestrian and Safety Study for this detailed discussion. As discussed, the Project would not contribute enough traffic to CMP roadway facilities to trigger the need for a Traffic Impact Analysis (TIA), and no further analysis is required.

## 2. Response to Comments

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## 2. Response to Comments

LETTER D – Governor’s Office of Planning and Research (OPR) State Clearinghouse and Planning Unit

April 29, 2019

## 2. Response to Comments

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## 2. Response to Comments



Gavin Newsom  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Kate Gordon  
Director

April 29, 2019

Edward Paek  
Los Angeles Unified School District  
333 South Beaudry Avenue, 21st Floor  
Los Angeles, CA 90017

Subject: Ascot Avenue Elementary School Comprehensive Modernization Project  
SCH#: 2019039153

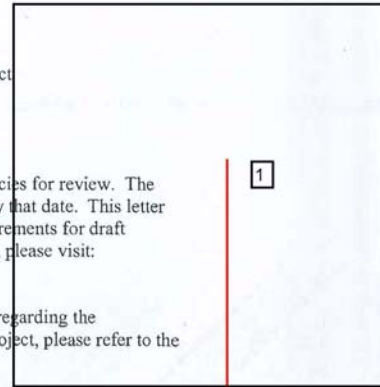
Dear Edward Paek:

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 4/26/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, please visit: <https://ceqanet.opr.ca.gov/2019039153/2> for full details about your project.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse



1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov

## 2. Response to Comments

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## 2. Response to Comments

### **Response to Comment D-1**

The comment verifies that no state agencies submitted comments by April 26, 2019, and acknowledges that the District has complied with the State Clearinghouse review requirements for draft environmental documents in accordance with CEQA. The District will add State Clearinghouse (SCH) # 2019039153 to the cover of the Final MND.

## 2. Response to Comments

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## 2. Response to Comments

LETTER E – Mya Edmonson, IGR/CEQA Branch Chief, State of California Department of Transportation,  
District 7 Office of Regional Planning

May 3, 2019

## 2. Response to Comments

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## 2. Response to Comments

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7- OFFICE OF REGIONAL PLANNING  
100 S. MAIN STREET, SUITE 100  
LOS ANGELES, CA 90012  
PHONE (213) 897-6536  
FAX (213) 897-1337  
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www.dot.ca.gov



*Making Conservation  
a California Way of Life.*

May 3, 2019

Edward Paek  
CEQA Project Manager  
333 South Beaudry Avenue, 21<sup>st</sup> Floor  
Los Angeles, CA 90017

RE: Ascot Avenue Elementary School  
Comprehensive Modernization Project  
SCH# 2019039153  
GTS# 07-LA-2019-02400  
Vic. LA-10/ PM 16.797

Dear Mr. Paek:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of demolishing 18 existing buildings (approximately 59,836 square feet) and structures on the 5.3-acre Ascot Avenue Elementary School (Ascot ES) campus; replacement with construction of 63,773 square feet of new buildings; modernization of 4 existing buildings including repairs and repainting; providing a designated Americans with Disabilities Act (ADA) route from the 4 existing buildings to the public right-of-way and new buildings, playground areas, and parking areas; completing site upgrades including sewer, water, and electrical utility, landscape, hardscape, and exterior paint; and completing improvements as required by the ADA, under LAUSD's School Upgrade Program (SUP) and to improve seismic safety. The proposed Project is not designed or expected to increase the current capacity of the Ascot ES campus.

The nearest State facility to the proposed project is Interstate 10. After reviewing the Mitigated Negative Declaration (MND), Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

1

Additionally, we encourage the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. Methods to reduce pedestrian and bicyclist exposure to vehicles improve safety by lessening the time that the user is in the likely path of a motor vehicle. These methods include the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

2

Pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and other signage and striping should be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Formal information from traffic control devices should be reinforced by informal sources of information such as lane widths, landscaping, street furniture, and other road design features.

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*

## 2. Response to Comments

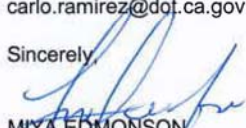
Mr. Paek  
May 3, 2019  
Page 2

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

3

If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at [carlo.ramirez@dot.ca.gov](mailto:carlo.ramirez@dot.ca.gov) and refer to GTS# 07-LA-2019-02400.

Sincerely,

  
MIYA EDMONSON  
IGR/CEQA Branch Chief  
Cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system  
to enhance California's economy and livability"*



## 2. Response to Comments

### **Response to Comment E-1**

The comment identifies that Interstate 10 (I-10) is the nearest State facility to the proposed Project. Adverse impacts are not expected to occur. A full summary of impacts and necessary mitigation measures of the proposed Project has been included in the IS/MND.

### **Response to Comment E-2**

The comment encourages the Lead Agency to consider reduction in vehicle speeds for the safety of pedestrians and bicyclists. The comment provides general information on how to reduce vehicle speeds by the construction of separated facilities, warning signage, flashing beacons, crosswalks, and other signage and striping. Currently, a reduced speed limit has been applied in the existing school zone. Further speed restrictions will be considered, and coordination will be undertaken by the City if deemed appropriate. As such, the comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project.

### **Response to Comment E-3**

The comment will be forwarded to the District's decision-makers for their required consideration prior to any approval or denial action being taken on the Project. The MND acknowledges that transportation of heavy construction equipment and/or materials that require the use of oversized-transport vehicles on State highways require a Caltrans transportation permit. LAUSD or their designee will submit the necessary permits prior to initiation of such activities.

## 2. Response to Comments

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## 2. Response to Comments

### F – Community Meeting Comments

April 11, 2019

On April 11, 2019, a community meeting was held for the proposed Project from 6:00 p.m. to 8:00 p.m. The meeting was held during the 30-day public review period of the proposed MND and Preliminary Environmental Assessment Equivalent (PEA-E). The meeting was attended by 30 people, including 17 members of the community, nine Los Angeles Unified School District (LAUSD) staff, two Sapphos Environmental, Inc. staff, one Spanish language interpreter, and one representative from the City of Los Angeles 9th City Council District. The meeting was held in the Auditorium of the Ascot Avenue Elementary School campus at 1447 E 45th Street, Los Angeles, California 90011. The purpose of the meeting was to describe the proposed project, provide an overview of the process undertaken by LAUSD in support of their role as a Lead Agency pursuant to CEQA, the determination to prepare an MND, present the MND findings, and solicit input from the public on the proposed project and the MND. After a project presentation and a summary of the MND findings, 17 questions and comments were provided verbally.

Verbal Comment Number	Environmental Issue Area	Comment	Verbal Response at Meeting
F-1	Public Services (Security)	Concerned about security along the alley – new trees?	Along the alley (south of Project site), Project will involve installing a wall and trees. The wall will not extend to the edge of the alley – it will be set back to provide visibility for traffic entering/exiting alley.
F-2	Aesthetics (Lighting)	How is the lighting going to be increased?	Project will provide general walkway lighting at night. Increased daylight and improved lighting will be provided in new classrooms – LAUSD has specific guidelines, such as the color of the bulb, to facilitate learning.
F-3	Project Description (status update)	Do we have a design?	The Project is still in the earliest phase of the design process, which is based on identifying feasibility or re-utilizing existing structures and appropriate areas of the campus for accommodating the proposed program – please see the zone map (buildings would be located along the northern and western perimeter to enclose the site around the kids and keep them safe). Project will be more enclosed than existing condition.
F-4	Project Description / Transportation (Parking)	Any recreational areas? Parking is limited already.	The proposed Project would either match or increase the number of play stations. Project would include more turf, landscaping, shade trees, and shelters. The play area surface would be cool surface coating to reduce temperature of play area by 10 degrees Fahrenheit. Once further into design, LAUSD will come back to the community with another meeting.

## 2. Response to Comments

Verbal Comment Number	Environmental Issue Area	Comment	Verbal Response at Meeting
F-5	Transportation / Pedestrian Safety (Safety Valet Program)	Will there be valet parking in the morning?	<p>LAUSD has evaluated potential implementation of its Safety Valet Program<sup>1</sup> along 41st Street and Ascot Avenue in a circulation study. The study evaluated curb cuts, etc. The study found that curb cuts do not provide a benefit to the campus and would reduce the play area. Curb cuts would impact only 15–20 minutes in morning and evening; it was a tradeoff to maximize what is provided to kids.</p> <p>The Safety Valet Program is coordinated by school principals with help from school police, who teach volunteers (it is all volunteer-run). If parents are interested, please talk to the principal. The program involves cars lining up and parents opening doors for kids so and escorting them to campus safely.</p> <p>The design would consider new striping, signage, and paint along the curb to limit parking during school drop off/pick up hours and keep parking for residents.</p>
F-6	Transportation / Pedestrian Safety (Safety Valet Program)	<p>The valet parking started a few weeks ago.</p> <p>Keep for Ascot.</p> <p>If curbs widened, will alleviate risk for children and parking issues.</p>	<p>LAUSD has looked at widening the curb out. This was tried at other schools; it can create other issues. It can create a safety hazard in some situations because merging cars create another conflict. In this situation it is better to limit parking with curb paint and signage and a valet program. At other schools, curb cuts add more safety concerns. Adding curb drop off lane at most sites will not alleviate traffic flow.</p>
F-7	Transportation / Pedestrian Safety / Public Services (Enforcement)	<p>Valet parking here actually works. If we start implementing on this side of school, it will work.</p> <p>When people receive citations for illegal parking, they get the message. Need more parking enforcement push on streets.</p> <p>Road rage is a concern – people are too busy near a school site.</p>	<p>Enforcement is sometimes what it takes. The valet system takes a few years to implement. Once parents buy in, so much improvement.</p>
F-8	Transportation / Pedestrian Safety (Parking)	<p>46th and Ascot Avenue: where will people park?</p> <p>Traffic might block at certain times.</p> <p>Some parents stop in middle of street</p>	<p>School day parking is a 1–2 hour (parking restriction for pick up and drop off times only.</p>
F-9	Public Services (Enforcement)	<p>Concerned about dumping in the alley, which might bring the school down. Can a camera be set up?</p>	<p>LAUSD is not authorized to place cameras to record activities outside of school facilities. LAUSD can coordinate with the City regarding mitigation measures, ways to improve visibility. Maybe a partial height wall with wrought iron on top would provide some visibility.</p> <p>LAUSD can coordinate with City to try to reduce undesirable behaviors.</p>

## 2. Response to Comments

Verbal Comment Number	Environmental Issue Area	Comment	Verbal Response at Meeting
F-10	Public Services (Enforcement)	Trash bins? A lot of people are selling things and they trash the corner. They throw their trash everywhere.	<p>LAUSD can look into this enforcement issue. It is the City's land (public right-of-way); LAUSD can coordinate with City regarding how to control some street vendors.</p> <p><i>9th District City Council Representative (Councilman Curren Price's office): The City will be increasing the number of trash bins in the area.</i></p>
F-11	Transportation / Pedestrian Safety	Were road bumps previously considered? Would eliminate some issues.	<p>Dialogue with the City Department of Transportation (LADOT) is needed. Need neighborhood consensus for road bumps (neighbors are most impacted).</p> <p><i>9th District City Council Representative: Mr. Price called, no feedback. Could look in to. Speed bumps are on a lottery system. Neighbors need to request them. The City installs speed bumps on 2 streets per year. A LADOT study was done – Ascot ES is a safe route to school. Is that on their radar?</i></p> <p><i>Commenter was encouraged to explore the LADOT website to apply for speed bumps.</i></p>
F-12	Transportation / Pedestrian Safety / Public Services (Enforcement)	Not everyone has resources from a computer (a lot of land lines/phones). People don't know their resources, who to call. Speed bumps improved 46th Street speeding/racing. People don't respect the stoplight.	<p><i>9th District City Council Representative: it has to be community-led, but the Councilman's office is willing and available to support the community in their efforts.</i></p> <p>LAUSD is a Safe Route to School<sup>2</sup> and Vision Zero, which is a neighborhood-initiated movement.</p>
F-13	Public Services (Enforcement)	This Project is beautiful, but it will be full of trash; Compton Avenue does not have street sweepers.	<p>LAUSD empathized with the community's concern related to maintaining the areas surrounding the school. LAUSD can have a dialogue with the City regarding additional enforcement efforts that can be undertaken to improve the surrounding areas, specifically to reduce the accumulation of refuse and associated unsightly condition.</p> <p>The proposed Project is within the school property line.</p> <p><i>9th District City Council Representative: Unfortunately, Compton Avenue is not considered residential (therefore not street swept). Commercial / industrial streets are the responsibility of the City of Los Angeles Bureau of Street Services.</i></p>
F-14	Transportation / Pedestrian Safety / Public Services (Enforcement)	There are street sweeping signs (no parking).	<p><i>9th District City Council Representative: not for street sweeping. I can check if we have street sweeping, the Councilmember's representative requested that the commenter provide locations, in the vicinity of Ascot Elementary where Street Sweeping signs are posted, but street sweeping is not evident</i></p>
F-15	Transportation / Pedestrian Safety / Public Services (Enforcement)	On Compton Avenue, signs are out there (street sweeping). People cannot park; if it's going to be enforced...	<p><i>9th District City Council Representative: Compton Avenue is not residential. The Councilmember's representative stated a willingness to coordinate with the City make sure eligible streets are being swept.</i></p>

## 2. Response to Comments

Verbal Comment Number	Environmental Issue Area	Comment	Verbal Response at Meeting
F-16	Public Outreach	Another meeting before you start the Project?	<p>Yes. There was a meeting in December 2018, this is the environmental meeting now then design update meetings, then preconstruction meetings, then construction meetings. LAUSD will send out notices and keep the public in the loop, particularly those that signed in and provided contact information.</p> <p>The next public meeting will be the Board of Education hearing. In June 2019 the Board will determine whether or not to proceed with this Project. LAUSD (Ashley Mercado) will keep the community updated.</p>
F-17	Transportation / Pedestrian Safety	At Ascot, a light to turn is needed.	<i>9th District City Council Representative: can submit request to LADOT to review.</i>

**SOURCE:**

<sup>1</sup> LAUSD. N.d. *OEHS Traffic and Pedestrian Safety Program*. Available at: <https://achieve.lausd.net/Page/4238>

<sup>2</sup> City of Los Angeles. N.d. *Safe Routes to School, Los Angeles, California*. Available at: <http://saferoutes.lacity.org/>

## 2. Response to Comments

### **Response to Comment F-1**

Section 3.2, *Project Description*, of the MND has been revised to clarify that, along the alley (south of Project site), the proposed Project would involve installing a wall and trees. The wall would not extend to the edge of the alley—it would be set back to provide visibility for traffic entering/exiting alley.

### **Response to Comment F-2**

Section 3.2, *Project Description*, of the MND has been revised to clarify how the lighting would be increased as a result of the Project (outdoor walkways and increased daylighting in classrooms).

### **Response to Comment F-3**

Section 3.2, *Project Description*, of the MND has been revised to clarify that the massing of the buildings would be designed to enclose the site around the kids along the northern and western perimeter to keep them safe from busy streets.

### **Response to Comment F-4**

Section 3.2, *Project Description*, of the MND has been revised to clarify that the proposed Project would either match or increase the number of play stations and include more turf, landscaping, shade trees, and shelters. The play area surface would be cool surface coating to reduce temperature of play area by 10 degrees Fahrenheit. Once further into design, LAUSD will come back to the community with another meeting.

### **Response to Comment F-5**

Section 2.4, *Existing Conditions*, of the MND has been revised to clarify that the Safety Valet Program is active at Ascot Avenue Elementary School along 41st Street and Ascot Avenue.

### **Response to Comment F-6**

Section 2.4, *Existing Conditions*, of the MND has been revised to clarify that the Safety Valet Program is active at Ascot Avenue Elementary School.

### **Response to Comment F-7**

Section 2.4, *Existing Conditions*, of the MND has been revised to clarify that the Safety Valet Program is active at Ascot Avenue Elementary School.

### **Response to Comment F-8**

Section 3.2, *Project Description*, of the MND has been revised to clarify that school parking would be restricted to a 1- to 2-hour loading-only zone during pick-up and drop-off times only.

## 2. Response to Comments

### **Response to Comment F-9**

LAUSD will coordinate with the City regarding ways to improve visibility and reduce security concerns about illegal dumping immediately south of the Ascot Avenue Elementary School campus.

### **Response to Comment F-10**

LAUSD will coordinate with the City regarding concerns about enforcement of littering violations around the Ascot Avenue Elementary School campus.

### **Response to Comment F-11**

The City Council will follow up with the community regarding the request for road bumps on Compton Avenue (a Vision Zero designated street).

### **Response to Comment F-12**

The City Council will follow up with the community regarding how to report violations (e.g., speeding) within the neighborhood.

### **Response to Comment F-13**

LAUSD will coordinate with the City of Los Angeles regarding the request for street sweepers on Compton Avenue.

### **Response to Comment F-14**

The City Council will follow up with the community regarding street sweeping on Compton Avenue.

### **Response to Comment F-15**

The City Council will follow up with the community regarding a potential discrepancy between street sweeping restriction signs and street sweeping activities.

### **Response to Comment F-16**

LAUSD will continue to provide notice for upcoming meetings during the Board of Education decision regarding the proposed Project, as well as the design, pre-construction, and construction phases.

### **Response to Comment F-17**

The City Council will follow up with LADOT regarding a request for a traffic light to turn at Ascot Avenue.



### 3. Mitigation Monitoring & Reporting Plan

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This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. LAUSD is the Lead Agency for the proposed Ascot Avenue Elementary School Classroom Addition Project (the Project) and therefore is responsible for administering and implementing the MMRP.

The proposed Project and all other LAUSD School Upgrade Program-related projects are required to comply with design standards, conditions and sustainable building practices. Certain standards assist in reducing environmental impacts, such as CALGreen<sup>1</sup> and the LAUSD Standard Conditions of Approval,<sup>2</sup> as applicable by incorporating features and conditions into the project definition and design.

**Collaborative for High Performance Schools (CHPS).**<sup>3</sup> The Project would include CHPS criteria points under seven categories: Integration (II), Indoor Environmental Quality (EQ), Energy (EE), Water (WE), Site (SS), Materials and Waste Management (MW), and Operations and Metrics (OM). Under the current 2014 CA-CHPS criteria, the project would earn at least 250 points—110 prerequisite criteria points and 140 criteria credit points. The optional credit points would be determined during later site and architectural design phases, but all prerequisites are required.

**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 in order 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.

**Standard Conditions of Approval.** LAUSD Standard Conditions of Approval are uniformly applied development standards that were compiled from established LAUSD standards, guidelines, specifications, practices, plans, policies, and programs, as well as from the District's typically applied mitigation measures. The Standard Conditions were adopted by the LAUSD Board of Education in November 2015.<sup>4</sup> The Standard Conditions of Approval have been updated since the adoption of the 2015 version in order to incorporate and reflect changes in the recent laws, regulations, and the Los Angeles Unified School District's standard policies, practices, and specifications. The conditions are divided into the 19 LAUSD CEQA environmental topics

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<sup>1</sup> California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations.

<sup>2</sup> LAUSD OEHS, "Standard Conditions of Approval for District Construction, Upgrade, and Improvements Projects," Adopted by the Board of Education on February 5, 2019.

<sup>3</sup> 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.

<sup>4</sup> LAUSD. 2015. Program EIR for the School Upgrade Program. Available at: <http://achieve.lausd.net/ceqa> (see Program EIR).

### 3. Mitigation Monitoring & Reporting Plan

(Appendix G of the CEQA Guidelines). For each Standard Condition of Approval compliance is triggered by factors such as the project type, existing conditions, and type of environmental impact.

**Mitigation Measures.** If after incorporation and implementation of Federal, State, and local regulations, CHPS prerequisite criteria, Project Design Features, and Standard Conditions of Approval 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, Project Design Features, and Standard Conditions of Approval.

This MMRP describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the Project and the methods of monitoring such actions.

This MMRP takes the form of a table that identifies the responsible entity for monitoring each mitigation measure and the timing of each measure.

### 3. Mitigation Monitoring & Reporting Plan

Number	Standard Conditions of Approval (SC) / Mitigation Measures (MM)	Timing	Responsible Monitoring Party	Responsible Implementing Party	Status of Implementation
<b>Noise</b>					
MM-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.	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	
MM-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.	Construction	LAUSD Facilities Services Division – Modernization	LAUSD Facilities Services Division – Modernization	