

Executive Summary

This Draft Environmental Impact Report (Draft EIR) has been prepared pursuant to the requirements of the California Environmental Quality Act (CEQA, Public Resources Code sections 21000 et. seq.) in accordance with CEQA Guidelines Section 15123. Accordingly, this chapter of the Draft EIR includes (1) a brief description of the Project; (2) issues raised during the Notice of Preparation (NOP) process, including areas of controversy known to the lead agency; (3) identification of potentially significant impacts and proposed mitigation measures or alternatives that would reduce or avoid those impacts; and (4) issues to be resolved, including the choice among alternatives and whether and how to mitigate the potential significant impacts.

1. Project Description

The Project Applicant, Harvard-Westlake School (School), is proposing to repurpose a site currently occupied by a private nine-hole, 27-par golf course and tennis facility, for use as an athletic and recreational facility for its students, employees and the general public (Project).

The area proposed for the Project consists of a 16.1-acre (701,428-square-foot) parcel, owned by the School (Property) located at 4047, 4141, and 4155 N. Whitsett Avenue and 12506, 12600, and 12630 W. Valley Spring Lane; and a 1.1-acre (47,916-square-foot) parcel the School leases from the Los Angeles County Flood Control District (Leased Property) (portion of Assessor Parcel Number [APN] 2375-018-903), which collectively comprise the 17.2-acre (749,344-square-foot) project site (Project Site). The Property consists of one parcel generally bounded by Bellaire Avenue to the west, Valley Spring Lane to the north, the Los Angeles River and Valleyheart Drive to the south, Whitsett Avenue to the east, and Los Angeles Fire Department (LAFD) Fire Station 78 to the southeast. The Leased Property is located between the Property and the Los Angeles River.

The Project would include an 80,249-square-foot multi-purpose gymnasium, located in the southern portion of the Project Site; a 52-meter swimming pool with 2,200 square feet of locker and meeting room space and bleacher seating in the north-central portion of the Project Site; and eight tennis courts with seating located to the east of the pool area. The Project would include two athletic fields, with Field A located in proximity to Whitsett Avenue in the southeastern portion of the Project Site, and Field B, located in proximity to Valley Spring Lane and Bellaire Avenue, in the western portion of the Project Site. Field houses for maintenance and storage are proposed at each field.

The Project would include a below-grade parking structure located in the eastern portion of the Project Site, with approximately 503 automobile parking spaces. Access to the parking structure would be via a two-way driveway on Whitsett Avenue. A second

driveway to access the parking structure would be via a drop-off and roundabout from Valleyheart Drive at the southeastern corner of the Project Site. This vehicle entrance area would also accommodate 29 surface parking spaces. The Project would also provide three security kiosks: a 180-square-foot ground-level security kiosk to the south of the tennis courts off of the north Whitsett Avenue pedestrian entrance, a 97-square-foot underground kiosk in the parking structure, and a 70-square-foot kiosk located in proximity to the roundabout and the at-grade parking.

The original, on-site Weddington Golf & Tennis clubhouse, including its café, is located on the northeastern portion of the Project Site and would remain as part of the Project. An existing putting green to the northeast of the clubhouse and the low brick retaining wall along the northeastern edge of the Property would also be retained. The six golf ball-shaped light standards on the Project would also be retained and relocated to the northeastern portion of the Property, in proximity to the clubhouse and putting green. Following their relocation on the Project Site, the golf ball-shaped light standards would remain visible from the public right-of-way.

The Project would implement an extensive tree planting and landscaping program that would remove 240 of the existing 421 inventoried on- and off-site trees (four of which are deemed dead and, therefore, excluded from mitigation requirements), and plant 393 trees, resulting in a net increase of 153 trees beyond existing conditions (or a 36 percent increase). The Project would include a 1-million-gallon stormwater capture and reuse system for water conservation and treatment purposes. The Project would also provide approximately 5.4 acres (235,224 square feet) of publicly-accessible open space and landscaped trails connecting to the adjacent Zev Greenway and on-site landscaped areas, water features, and recreational facilities.

It is anticipated that School-related practices and game competition would occur in the afternoons and early evenings, with approximately 5.4 acres (235,224 square feet) of proposed water features, benches, wooded areas, and natural spaces open to the public from 7:00 a.m. to 9:00 p.m., seven days a week. Landscaped, publicly-accessible trails, which would circumnavigate the Project Site and cover a distance of approximately 0.75 mile, would allow dog walking, recreation, relaxation, and observation of the natural setting and biodiversity around the Project Site. A new Americans with Disabilities Act (ADA) compliant trail would connect to the existing Zev Greenway, and a trail through the center of the Project Site starting at Whitsett Avenue would lead from the street to the tennis courts.

Off-site from the Project, the Project would also provide improvements to the segment of Valleyheart Drive south of LAFD Fire Station 78 and to portions of the Zev Greenway adjacent to the Project Site and would install an ADA-compliant accessible pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue (Coldwater Canyon Avenue Riverwalk Path Ramp).

2. Issues Raised During Notice of Preparation Process

The following summarizes the key potential environmental issues raised in response to the NOP and during the public scoping meeting (the reference in parenthesis is the EIR chapter/section in which the analysis is provided). The comments on the Initial Study as part of the NOP process are contained in Appendix A of this EIR.

- Concern that publicly-accessible trails would be unavailable during school activities (Refer to Chapter II, *Project Description*, of this EIR.)
- Concern that the School's commitment for public access will not be enforced (Refer to Chapter II, *Project Description*, of this EIR.)
- Concern that open space within the Project Site would not be publicly-accessible or that no publicly-accessible open space would be provided (Refer to Chapter II, *Project Description*, of this EIR.)
- Concern that perimeter walls are too tall (Refer to Chapter II, *Project Description*, of this EIR.)
- Concern that light poles are too tall (Refer to Chapter II, *Project Description*, and Section IV.A, *Aesthetics*, of this EIR.)
- Concern that the gymnasium is too massive. Comments also expressed that the gymnasium basement space should be cited as building floor area (Refer to Chapter II, *Project Description*, of this EIR, and Appendix A, Initial Study, of this Draft EIR for a discussion of Aesthetics impacts.)
- Expressed opposition to the off-site Coldwater Canyon Avenue Riverwalk Path Ramp (Refer to Chapter II, *Project Description*, of this EIR.)
- Opposition to the number and location of driveways (Refer to Chapter II, *Project Description*, and Section IV.M, *Transportation*, of this EIR.)
- Concern that light pollution and glare would emanate from field light, pool lights, and tennis court lights (Refer to Section IV.A, *Aesthetics*, of this EIR.)
- Concern regarding adverse air quality impacts from construction equipment, on-road mobile sources, and stationary sources (Refer to Section IV.B, *Air Quality*, of this EIR.)
- Concern that haul trucks exporting soils would adversely affect human health (Refer to Section IV.B, *Air Quality*, of this EIR.)
- Concern regarding the effects of construction and operational air emissions on sensitive receptors (Refer to Section IV.B, *Air Quality*, of this EIR.)
- Concern regarding the effects of fugitive dust on sensitive receptors (Refer to Section IV.B, *Air Quality*, of this EIR.)
- Concern regarding the impacts on trees, the effect of removing mature tree canopy, request for phased tree removal, and request for compliance with the Los Angeles

River Master Plan Landscaping Guidelines and Plant Palettes (Refer to Chapter II, *Project Description*, and Section IV.C, *Biological Resources*, of this EIR.)

- Request for compensatory mitigation for adverse impacts to sensitive plants, animals, and habitat (Refer to Section IV.C, *Biological Resources*, of this EIR.)
- Request for measures to protect nesting birds and biological monitoring (Refer to Section IV.C, *Biological Resources*, of this EIR.)
- Request for information on the effects of replacement trees on the Los Angeles River concrete channel (Refer to Section IV.C, *Biological Resources*, of this EIR.)
- Request for the provision of a habitat buffer adjacent to the Los Angeles River (Refer to Section IV.C, *Biological Resources*, of this EIR.)
- Concern regarding adverse impacts on cultural and historical resources (Refer to Section IV.D, *Cultural Resources*, of this EIR.)
- Concern that the Project would generate greenhouse gas emissions and impact climate change (Refer to Section IV.G, *Greenhouse Gas Emissions*, of this EIR.)
- Concern that the Project's buildings and facilities (including artificial turf) would cause an urban heat island effect (Refer to Section IV.G, *Greenhouse Gas Emissions*, of this EIR.)
- Concern that hazardous materials and microbes would be released during construction (Refer to Section IV.H, *Hazards and Hazardous Materials*, of this EIR.)
- Concern regarding potential health hazards of artificial turf fields (Refer to Section IV.H, *Hazards and Hazardous Materials*, of this EIR.)
- Concern regarding the collection and treatment of off-site watershed surface runoff (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding maintaining the carrying capacity and freeboard of the Los Angeles River Channel (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding the increase of rate and flow resulting in flooding due to large scale excavation (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding the increase in flooding due to the release of excess water from the stormwater capture and reuse system (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding an adverse impact of the water treatment system on water quality (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding the feasibility of construction in an area with a high water table (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding pollutant loading from the Project entrance on Valleyheart Drive (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)

- Concern regarding the effects of dewatering on the groundwater table (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding the effects of groundwater extraction on the Los Angeles River (Refer to Section IV.I, *Hydrology and Water Quality*, of this EIR.)
- Concern regarding a “Commercial use” in the A1 zone and consistency of the Project with the Zoning Code (Refer to Chapter II, *Project Description*, and Section IV.J, *Land Use and Planning*, of this EIR.)
- Concern regarding construction noise impacts associated with heavy equipment and trucks (Refer to Section IV.K., *Noise*, of this EIR.)
- Concern regarding operational noise impacts associated with outdoor sports, referee whistles, megaphones, cheering crowds, and other spectator noise (Refer to Section IV.K., *Noise*, of this EIR.)
- Concern regarding operational noise impacts of amplified sound systems (Refer to Section IV.K., *Noise*, of this EIR.)
- Concern regarding equipment noise and vibration during operation (Refer to Section IV.K., *Noise*, of this EIR.)
- Concern regarding parking congestion on neighborhood streets and Ventura Boulevard (Refer to Chapter II, *Project Description*, and Section IV.M, *Transportation*, of this EIR.)
- Concern regarding vehicle congestion on Whitsett Avenue and impact on LAFD Station 78 emergency access (Refer to Sections IV.L.1, *Fire Protection*, and IV.M, *Transportation*, of this EIR.)
- Concern that crime would increase (Refer to Sections IV.L.2, *Police Protection*, of this EIR.)
- Concern regarding the reduction in tennis courts from the current sixteen to eight, and public access to the Project’s courts (Refer to Section IV.L.3, *Parks and Recreation*, of this Draft EIR.)
- Concern regarding the removal of the golf course (Refer to Section IV.L.3, *Parks and Recreation*, of this Draft EIR.)
- Concern regarding the effects of construction activities on traffic flow (Refer to Section IV.M, *Transportation*, of this EIR.)
- Concern regarding local and area-wide traffic congestion during operation (Refer to Section IV.M, *Transportation*, of this EIR.)
- Concern regarding an increase in domestic water demand (Refer to Section IV.O.1, *Utilities*, of this EIR.)
- Concern regarding higher solid waste demand (Refer to Section IV.O.3, *Solid Waste*, of this EIR.)
- Concern regarding cumulative effects in combination with the development of the Sportsman’s Lodge Project and other commercial projects on Ventura Boulevard

(Refer to cumulative analyses in Chapter IV, *Environmental Impact Analysis*, of this EIR).

- Concern that the EIR will not provide a reasonable range of alternatives, and suggesting a reduced intensity alternative and natural habitat alternative (Refer to Chapter V, *Alternatives*, of this EIR)

3. Significant and Unavoidable Environmental Impacts

Section 15126.2(a) of the State *CEQA Guidelines* requires that an EIR describe significant environmental impacts of a project on the environment. Direct and indirect significant effects shall be clearly identified and described, giving due consideration to short-term and long-term effects. Based on the analysis contained in Chapter IV, *Environmental Impact Analysis*, and as evaluated in Section IV.K, *Noise*, of this Draft EIR, and summarized below, implementation of the Project would result in significant impacts that cannot be mitigated with respect to Project-level and cumulative on-site and off-site noise/vibration sources during construction.

On-Site Construction Equipment Noise (Project-Level): Mitigation Measure NOI-MM-1 provides for sound barriers that would achieve a noise reduction of a minimum 15 dBA to residences to the west and north of the Project Site, a 12 dBA reduction to residences and a church to the east of the Project Site, and an 8 dBA reduction to the single-family residential use to the south of the Project Site. These noise barriers shall be in-place during early Project construction phases (remain up to the start of building framing) and during paving when heavy equipment is used. Temporary barriers shall provide acoustically sealed gate access as needed for construction activities, deliveries, and site access by construction personnel. Mitigation Measure NOI-MM-2 would require that construction equipment generating high levels of noise and vibration whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located at least 100 feet away from the nearest off-site sensitive land uses, or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses. Mitigation Measure NOI-MM-3 requires the use of power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. No impact pile driving shall be utilized; augered or drilled piles would be permitted. Flexible sound control curtains shall be placed around all stationary compressors and generators, drilling apparatuses, drill rigs, and jackhammers when in use. The flexible sound control curtains shall have a minimum Sound Transmission Class (STC) rating of 25.

Implementation of Mitigation Measures NOI-MM-1, NOI-MM-2, and NOI-MM-3 would reduce the Project's on-site construction noise impacts at the off-site noise sensitive

receptors, to the extent technically feasible.¹ Specifically, the mitigation measures would reduce construction noise levels by a minimum of 15 dBA at receptor locations R1 through R4, 12 dBA at receptor locations R5 and R6, and 8 dBA at receptor location R7, which would reduce the construction noise impacts at receptor locations R4 through R7 to less-than-significant levels. The construction noise levels at receptor locations R4 through R7 would be reduced below the 5-dBA significance threshold. However, the construction noise levels at receptor locations R1 through R3 would still exceed the 5-dBA significance threshold, as temporary construction noise barriers are limited to a 15-dBA noise reduction.² Consequently, with implementation of technically feasible mitigation measures, construction noise impacts at noise-sensitive receptors R1 through R3 would exceed the significance threshold temporarily during certain months of construction, when there would be multiple simultaneous construction activities and some equipment used near the periphery of the Project Site. Construction noise impacts would be lower than peak levels when equipment is used in the interior portions of the Project Site, with equipment noise reduced (attenuating) at a rate of at least 6 dBA per doubling of distance between the equipment and the sensitive receptor. The mitigated noise levels conservatively assume that the loudest equipment used during the various construction stages and construction activities would be located on the Project Site in the applicable construction work area for the construction activity at the nearest distance to the sensitive receptor location. There are no other feasible mitigation measures that could be implemented to reduce the temporary noise impacts from on-site construction. Therefore, construction noise impacts associated with on-site noise sources would remain significant and unavoidable.

On-Site Construction Equipment Noise (Cumulative): Cumulative construction noise impacts associated with on-site construction equipment could be significant in the event that construction activities as part of Related Project Nos. 1 through 5 occur within 500 feet of the Project Site (though the related projects are located at distances between 530 and 630 feet from the Project Site as described in Section IV.K, Noise). The Project would implement Mitigation Measures NOI-MM-1, NOI-MM-2, and NOI-MM-3 to reduce construction noise impacts. Implementation of these mitigation measures would reduce the Project's construction noise impacts at receptor locations R4, R5, R6, and R7 to less than significant at the Project-level; however, construction noise impacts at receptor locations R1, R2, and R3 would continue to be significant. Although it is expected that Related Project Nos. 1 through 5 would implement mitigation that would reduce construction noise impacts similar to the Project, overlapping construction activities could result in significant cumulative impacts. The Project and Related Project Nos. 1 and 5 could contribute to construction noise at receptor location R1 that may exceed the significance threshold. The Project and Related Project Nos. 2, 3, or 4 could contribute to

¹ Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. LAMC Chapter XI, Art. 1, Section 112.05.

² Receptor Location R1 is representative of single-family residential uses along Bellaire Avenue to the west of the Project Site. Receptor Locations R2 and R3 are representative of single-family residential uses along Valley Spring Lane, generally north of the Project Site and west of Beeman Avenue.

construction noise at receptor location R7 that could potentially exceed the significance threshold. Thus, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with on-site construction equipment would be cumulatively considerable and would represent a significant and unavoidable cumulative impact at receptor locations R1 and R7.

Off-Site Construction Noise – Mobile Sources (Cumulative): The Project would not result in any significant off-site construction noise impacts due to construction trips. However, cumulative construction noise impacts associated with off-site construction truck traffic from multiple related projects could potentially overlap with the Project on some days and generate noise in excess of the significance threshold if the related projects contribute more than 38 truck trips per hour at the same time as the Project's maximum truck trips of 50 per hour.³ No additional feasible mitigation measures are available for the Project to implement to further reduce impacts. Residential land uses comprise the majority of existing sensitive uses within the Project Site area that could be impacted by the increase in traffic generated noise levels. Construction of sound barriers would be inappropriate for residential land uses that face the roadway as it would create aesthetic and access concerns. Thus, it is conservatively concluded that the Project's contribution to cumulative construction noise associated with off-site construction truck traffic along the haul route would be cumulatively considerable and would represent a significant and unavoidable cumulative impact.

Off-Site Improvements at Coldwater Canyon Avenue Riverwalk Path Ramp: Construction Equipment Noise (Project-Level): Implementation of Mitigation Measure NOI-MM-3 would reduce the construction noise impacts from the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp at the off-site noise sensitive receptor (receptor location R8), to the extent technically feasible.⁴ However, construction noise levels at the sensitive receptor location north of the Coldwater Canyon Avenue Riverwalk Path Ramp (receptor location R8) would still exceed the 5-dBA significance threshold, as noise barriers would not be effective given that the construction work would take place at a lower elevation than the sensitive receptors. The sensitive receptors would still have a direct line-of-sight to the pedestrian ramp construction site and any benefits of a noise barrier would not occur. It is not feasible to install a construction noise barrier of sufficient height that would block the line-of-sight for receptor location R8 due to technical limitations including barrier foundation needs and wind load capacities. The construction work area is within 100 feet away from the nearest off-site sensitive land uses. Thus, Mitigation

³ While the Project would generate up to a maximum of 50 truck trips per hour (inbound plus outbound), the Coldwater Canyon Avenue segment between US-101 and Moorpark Avenue would have both inbound and outbound truck trips. The other analyzed roadway segments would only have either inbound or outbound truck trips, but not both. The segments that would have up to a maximum of 25 truck trips per hour include: Moorpark Street segment between Coldwater Canyon Avenue and Whitsett Avenue; Whitsett Avenue segment between Moorpark Street and Ventura Boulevard; Ventura Boulevard segment between Coldwater Canyon Avenue and Whitsett Avenue; and Coldwater Canyon Avenue segment between Moorpark Avenue and Ventura Boulevard.

⁴ Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment. LAMC Chapter XI, Art. 1, Section 112.05.

Measures NOI-MM-1 and NOI-MM-2 are not technically feasible for construction of the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp. Therefore, construction noise impacts associated with construction of the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp would be temporarily significant and unavoidable.

Off-Site Construction Noise from Coldwater Canyon Avenue Riverwalk Path Ramp: Construction (Cumulative): Related Project Nos. 1 and 5 are located at 12833 Ventura Boulevard, approximately 120 feet south of the nearest residential use to the proposed Coldwater Canyon Avenue Riverwalk Path Ramp location. While construction related to Related Projects 1 and 5 is at or near completion, this analysis has conservatively evaluated these related projects. Therefore, it is conservatively assumed that construction of these related projects could occur at the same time as construction of the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp. The residential uses in the vicinity of the Coldwater Canyon Avenue Riverwalk Path Ramp location could be exposed to construction noise from both the Coldwater Canyon Avenue Riverwalk Path Ramp and the Related Projects 1 and 5. As analyzed above, the estimated Project construction noise level at receptor location R8 would exceed the 5-dBA significance threshold and the construction related noise from Related Project Nos. 1 and 5 would contribute to the cumulative noise impacts. There are no feasible mitigation measures to reduce the impact. This would represent a significant and unavoidable cumulative impact at receptor location R8.

Off-Site Improvements at Coldwater Canyon Avenue Riverwalk Path Ramp: Construction Equipment Vibration – Human Annoyance (Project-Level): With respect to human annoyance, the Federal Transit Administration's *Transit Noise and Vibration Impact Assessment* identifies Category 2 uses, or buildings where people normally sleep as sensitive receptors. As discussed above, per FTA guidance, the significance criteria for human annoyance is 72 VdB for Category 2 uses for frequent events, assuming a minimum of 70 vibration events occurring during a typical construction day. As analyzed in Section IV.K, *Noise*, of this Draft EIR, the estimated vibration levels due to construction equipment for the Coldwater Canyon Avenue Riverwalk Path Ramp would exceed the significance threshold for human annoyance at the sensitive receptors north of the Coldwater Canyon Avenue Riverwalk Path Ramp (receptor location R8). Potential mitigation measures to reduce vibration impacts from construction activities with respect to human annoyance could include the installation of a wave barrier, which is typically a trench or a thin wall made of sheet piles installed in the ground (essentially a subterranean sound barrier to reduce noise). However, wave barriers must be very deep and long to be effective and are not considered feasible for temporary applications, such as Project construction.⁵ Per the Caltrans Transportation and Construction Vibration Guidance Manual, the wave barrier would need to be at least two-thirds of the seismic wavelength and the length of the barrier must be at least one wavelength (typical wavelength can be up to 500 feet). In addition, constructing a wave barrier to reduce the

⁵ Caltrans, *Transportation and Construction Vibration Guidance Manual*, p. 41. September 2020.

Project's construction-related vibration impacts would, in and of itself, generate groundborne vibration from the excavation equipment. Thus, it is concluded that there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from construction vibration impacts associated with human annoyance at the vibration-sensitive receptor location R8. Therefore, the Project would result in the generation of excessive groundborne vibration, and vibration impacts associated with human annoyance from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp would be significant and unavoidable at receptor location R8.

Off-Site Improvements at Coldwater Canyon Avenue Riverwalk Path Ramp: Construction Vibration – Human Annoyance (Cumulative): Due to rapid attenuation characteristics of groundborne vibration, only related projects located adjacent to the same sensitive receptors would result in cumulatively considerable vibration impacts. Related Project Nos. 1 and 5 are approximately 120 feet south of the nearest residential use to the proposed Coldwater Canyon Avenue Riverwalk Path Ramp location. Groundborne vibration exceeding the human annoyance threshold at receptor location R8 would occur as a result of construction of the proposed Coldwater Canyon Avenue Riverwalk Path Ramp, and Related Projects could contribute to the human annoyance vibration impact. There are no feasible mitigation measures to reduce the temporary vibration impacts from construction vibration impacts associated with human annoyance at the vibration-sensitive receptor location R8. Therefore, construction of the Project would result in a cumulatively considerable contribution and would have a significant and unavoidable cumulative impact with regard to groundborne vibration (human annoyance) at receptor location R8.

4. Alternatives that Would Reduce or Avoid Significant Impacts

a) Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development Project on an identifiable property consists of the circumstance under which the Project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the Project Site. The current Weddington Golf and Tennis facility would discontinue operation because the current use is not consistent with the School's educational mission or financially sustainable for the School. Because existing operations would cease, the Project Site would be fenced off and closed for security purposes. Infrequent, periodic trips to the Project Site could occur for limited maintenance and/or security checks, as needed.

b) Alternative 2: At Grade Parking Alternative

Alternative 2 would eliminate the 503-space subterranean garage and the 1-million-gallon underground stormwater capture and reuse system. Under Alternative 2, the Project's one level of subterranean vehicle parking spaces would be relocated to at grade (also 503 spaces), within the footprint of Field A as proposed under the Project, with Field A located on an elevated structure above the at-grade parking area. The elevated base height of Field A would be approximately 14 feet above grade. The Field A bleachers would reach a height of 30 feet, which would be within the Project Site's zoning limitations. Light poles for Field A would reach approximately 70 feet above the elevated field, or approximately 85 feet above grade. In lieu of the Project's 1-million-gallon underground stormwater capture and reuse system, Alternative 2 would install an on-site capture, treatment, and release system to collect and treat stormwater consistent with applicable LAMC LID requirements.

The gymnasium, Field B, the swimming pool, and tennis courts would be developed in the same locations and configurations as under the Project. The clubhouse, golf ball-shaped light standards, low brick retaining wall, and putting green would be the same as under the Project. In addition, pathways, landscaping, tree replacement, and public access through the Project Site to the Zev Greenway would be the same as the Project. Perimeter fencing would be the same as under the Project. Generally, site access would be similar to the Project. Similar to the Project, Alternative 2 would provide an ADA-compliant pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue (the Coldwater Canyon Avenue Riverwalk Path Ramp). The operational characteristics and athletic programming of the Project would not change under Alternative 2. Alternative 2 would continue to provide special events for both the School and the public as proposed for the Project.

By eliminating the Project's subterranean parking and underground stormwater capture and reuse system, Alternative 2 would reduce the Project's soil export of 250,000 cubic yards to 123,223 cubic yards (8,802 trucks or 17,604 truck trips), which is a reduction of 126,777 cy (114,877 cubic yards + 11,900 cubic yards) or 9,055 trucks or 18,110 truck trips. Overall, even after considering the elevated Field A construction, the construction duration under Alternative 2 would be approximately 26 months, or 4 months shorter than the 30 months under the Project.

c) Alternative 3: Reduced Density and Programming Alternative

Alternative 3 would reduce the Project's scale of development and programming. The primary physical changes compared to the Project include the elimination of the tennis courts and relocation of the Project's other recreational facilities. By eliminating the tennis courts, the number of light poles above the 30-foot conforming height limit would be reduced to 20 (a reduction of 12). Related changes and reconfiguration of pathways and landscaping would also occur. Alternative 3 would also eliminate the Project's 503-space subterranean parking garage and the 1-million-gallon stormwater capture and reuse

system. From west to east along Valley Spring Lane, Alternative 3 would include surface parking, the swimming pool, Field B and the gymnasium. Field A would remain adjacent to Whitsett Avenue in its same location as the Project. The clubhouse, putting green, low brick retaining wall, and golf ball-shaped light standards would remain as under the Project. Similar to the Project, Alternative 3 would provide a path to the Zev Greenway trail accessible to the public through the Project Site and would also install an ADA-compliant pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue (the Coldwater Canyon Avenue Riverwalk Path Ramp). A total of 433 vehicle parking spaces would be provided under Alternative 3, compared to 503 spaces under the Project.

The operation of the Project Site would change under Alternative 3 with the elimination of the tennis courts. The elimination of the tennis courts would reduce concurrent athletic events and would reduce the period of time the Project Site would be in use. With the elimination of the tennis courts, operating hours and outdoor activity on the Project would end no later than 8:00 p.m., compared to 9:00 p.m. as proposed by the Project with the tennis courts. Considering just the School's athletic uses, outdoor activities would end earlier than 7:30 p.m. on all but five weekdays (based upon the 2018-19 athletics calendar). Alternative 3 would continue to provide special events for both the School and the public as proposed for the Project. Public access to the Project Site would still be available, however, public trails and total open space for public use would be reduced to roughly half (approximately 2.5 acres) of the 5.4 acres provided for the Project. Alternative 3 would also eliminate the tennis-associated employees regularly present on-site.

By eliminating the Project's subterranean parking and underground stormwater capture and reuse system, Alternative 3 would reduce the Project's soil export of 250,000 cy to 90,100 cy (6,436 trucks or 12,872 truck trips), which is a reduction of 159,900 cy (148,000 cy + 11,900 cy) or 11,421 trucks or 22,842 truck trips. Total construction time of Alternative 3 would be approximately 19 months, or 11 months shorter than the 30 months under the Project.

d) Alternative 4: No Public Use/No Public Events Alternative

Alternative 4 would seek to reduce impacts from Project operation by eliminating public access to the Project Site. With no public access, certain park features intended for public use, including walking/jogging paths, preservation of open space, and public courtyards would also be eliminated. However, the overall amount of landscaped/planted areas would be generally similar to the Project. Perimeter walls and fencing would be provided along the Project Site's boundaries, except near the clubhouse, putting green, and low-brick retaining wall, and designed to provide views to the interior recreational facilities, but also to attenuate sound from traveling to adjacent residential uses.

The clubhouse, putting green, low brick retaining wall, and golf ball-shaped light standards would remain as under the Project, but the public would not have access to them since the entire Project Site would be closed to public access. Under Alternative 4, School uses for

the clubhouse could include, but not be limited to, office space (facilities and IT), classroom space, lab environment for Los Angeles River water quality monitoring, team rooms, and a café space dedicated to the School community (students, parents, alumni).

The Project's 1-million-gallon stormwater capture and reuse system would not be developed under Alternative 4. The 503-space subterranean parking garage, 29-space surface parking lot, gymnasium building, Field A, Field B, the swimming pool, and the tennis courts proposed by the Project would be developed under Alternative 4 for use by the School only. In addition, site access and circulation would be similar as under the Project, in which the Project Site would be accessed via Valleyheart Drive on the south and Whitsett Avenue on the east. A public access path to the Zev Greenway through the Project Site would not be provided. However, the Coldwater Canyon Avenue Riverwalk Path Ramp would be developed as under the Project.

Alternative 4 would continue to provide special events for the School, but not for the public. Without public use of the Project Site, including no public special events, overall usage of the Project Site, including the number of visitors, would decrease significantly, as 80 percent of the Project's estimated usage would be from the public. Under Alternative 4 on weekdays, the Project Site would be minimally used prior to 2:30 p.m., and hours of weekday outdoor activity would halt at no later than 8:00 p.m., instead of 9:00 p.m. as compared to the Project (and, in some cases, significantly earlier than 8:00 p.m. based upon a review of the School's 2018-19 athletics calendar). Under Alternative 4, no public use and limited School use would occur on Saturdays, and no use of the Project Site by the public or the School would occur on Sundays.

With elimination of the Project's 1-million-gallon underground stormwater capture and reuse system under Alternative 4, the Project's total soil export of 250,000 cubic yards would be reduced by 11,900 cubic yards (850 or 1,700 truck trips) to 238,100 cubic yards (17,007 trucks or 34,014 truck trips). Total construction time of Alternative 4 would be approximately 28 months, or 2 months shorter than the 30 months under the Project.

e) Environmentally Superior Alternative

Section 15126.6(e)(2) of the State *CEQA Guidelines* indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the "No Project" alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible Alternatives includes (1) the No Project/No Build Alternative, (2) At Grade Parking Alternative, (3) the Reduced Density/Programming Alternative, and (4) the No Public Use/No Public Events Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative to the environmental impacts associated with the Project is provided in **Table V-2, Comparison of Impacts Associated with the Alternatives and the Project**, in

Chapter V, *Alternatives*, of this Draft EIR. As indicated in Table V-2, the No Project/No Build Alternative would result in a mix of no impacts and less than significant impacts on the environment and, as such would have fewer environmental impacts than under the Project or other Alternatives. Further, the No Project/No Build Alternative would avoid the Project's short term significant and unavoidable construction noise impacts. Therefore, the No Project/No Build Alternative is considered the overall environmentally superior Alternative. However, this Alternative would not provide the beneficial effects of the Project and other Alternatives. As shown in **Table V-3**, *Ability of Alternatives to Meet Project Objectives*, in Chapter V, *Alternatives*, of this Draft EIR, the No Project/No Build Alternative would not allow for the underlying purpose of the Project to supplement the School's athletic and recreational facilities, and provide Harvard-Westlake School a campus that can fulfill its educational mission and athletic principles now and in the future. Nor would it provide for any public use or implementation of sustainable building features.

The State *CEQA Guidelines* require that the EIR identify an environmentally superior Alternative other than the No Project/No Build Alternative. As discussed in detail in Chapter V, *Alternatives*, of this Draft EIR, excavation and soil hauling activities, which generate construction-related air and GHG emissions, energy demand, impacts on archaeological and paleontological resources, erosion, and noise and vibration have the greatest effect in increasing or reducing a range of environmental impacts. Alternative 3 would reduce excavation and haul truck activity to a greater extent than Alternatives 2 and 4, and would result in the greatest reduction in the duration of the Project's significant and unavoidable construction noise impacts. However, because construction noise impacts are based on a peak day of activity and not duration of activity, none of the Alternatives 2 through 4 would reduce construction noise impacts to a level that is less than significant. Because the Project, Alternatives 2, 3 and 4 would involve the same Coldwater Canyon Avenue Riverwalk Path Ramp, the same significant and unavoidable temporary, construction-related human annoyance vibration impacts would occur under the Project, Alternatives 2, 3, and 4. In accordance with the State *CEQA Guidelines* requirement to identify an environmentally superior Alternative other than the No Project/No Build Alternative, despite not reducing the construction duration and excavation quantity to the largest extent of the Alternatives, because Alternative 4 would reduce the highest number of environmental impacts, including reducing long-term operational impacts related to air and GHG emissions, as well as lighting, historic resources, and noise, Alternative 4 is selected as the Environmentally Superior Alternative.

5. Summary of Environmental Impacts

This section summarizes the environmental impacts of the Project as evaluated in Chapter IV, Environmental Impact Analysis, of this Draft EIR. The summary is provided by environmental issue area below in **Table ES-1**, *Summary of Project Impacts*. Following Table ES-1, the Project's proposed Project Design Features (PDFs) and required mitigation measures (MMs) are listed.

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.A AESTHETICS			
LIGHT AND GLARE			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
IV.B AIR QUALITY			
CONSISTENCY WITH APPLICABLE AIR QUALITY PLAN			
<i>Construction</i>	Not applicable	See Mitigation Measure AQ-MM-1 (Construction Equipment), below.	Less Than Significant with Mitigation
<i>Operation</i>	Not applicable	None required	Less Than Significant
CUMULATIVELY CONSIDERABLE INCREASE OF CRITERIA POLLUTANTS IN NONATTAINMENT AREA			
<i>Construction</i>	Not applicable	See Mitigation Measure AQ-MM-1 (Construction Equipment), below.	Less Than Significant with Mitigation
<i>Operation</i>	Not applicable	None required	Less Than Significant
SENSITIVE RECEPTOR EXPOSURE TO POLLUTANT CONCENTRATIONS			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.C BIOLOGICAL RESOURCES			
CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES			
<i>Plants – Direct</i>	Not applicable	None required	Less Than Significant
<i>Plants - Indirect</i>	Not applicable	None required	Less Than Significant
<i>Wildlife – Direct</i>	Not applicable	See Mitigation Measure BIO-MM-1 (Western Yellow Bat), below.	Less Than Significant with Mitigation
<i>Wildlife - Indirect</i>	Not applicable	None required	Less Than Significant
RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN LOCAL OR REGIONAL PLANS, POLICIES, REGULATIONS			
<i>Sensitive Natural Community – Direct</i>	Not applicable	See Mitigation Measure BIO-MM-2 (California Brittlebush Scrub), below.	Less Than Significant with Mitigation
<i>Sensitive Natural Community – Indirect</i>	Not applicable	None required	Less Than Significant
WILDLIFE CORRIDORS/NATIVE WILDLIFE NURSERY SITES			
<i>Wildlife Corridors</i>	Not applicable	None required	Less Than Significant
<i>Migratory Species and Native Wildlife Nursery Sites</i>	See Project Design Feature PDF-BIO-1 (Nesting Birds), below.	See Mitigation Measure BIO-MM-1 (Western Yellow Bat), below.	Less Than Significant with Mitigation
CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES	See Project Design Feature PDF-BIO-1 (Nesting Birds), below.	See Mitigation Measures BIO-MM-1 (Western Yellow Bat), BIO-MM-2 (California Brittlebush Scrub) and BIO-MM-3 (Trees), below.	Less Than Significant with Mitigation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.D CULTURAL RESOURCES			
HISTORICAL RESOURCES	See Project Design Features CUL-PDF-1 (Rehabilitation Plan), CUI-PDF-2 (Documentation), and CUL-PDF-3 (Interpretation), below.	None required	Less Than Significant
ARCHAEOLOGICAL RESOURCES	Not applicable	None required	Less Than Significant
HUMAN REMAINS	Not applicable	None required	Less Than Significant
IV.E ENERGY			
WASTEFUL, INEFFICIENT, AND UNNECESSARY CONSUMPTION OF ENERGY RESOURCES			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature GHG-PDF-1 (Solar), below.	None required	Less Than Significant
CONFLICT OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Features GHG-PDF-1 (Solar), WS-PDF-1, and WS-PDF-2 (Water Supply), below.	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.F GEOLOGY AND SOILS			
HAZARDOUS GEOLOGIC CONDITIONS	Not applicable	None required	Less Than Significant
SOIL EROSION OR LOSS OF TOPSOIL	Not applicable	None required	Less Than Significant
UNSTABLE GEOLOGIC UNIT OR SOILS	Not applicable	None required	Less Than Significant
EXPANSIVE SOILS	Not applicable	None required	Less Than Significant
PALEONTOLOGICAL RESOURCES	Not applicable	None required	Less Than Significant
IV.G GREENHOUSE GAS EMISSIONS			
GREENHOUSE GAS EMISSIONS	See Project Design Feature GHG-PDF-1 (Solar), below.	None required	Less Than Significant
CONFLICT WITH ANY APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GHGS	See Project Design Feature GHG-PDF-1 (Solar), below.	None required	Less Than Significant
IV.H HAZARDS AND HAZARDOUS MATERIALS			
SIGNIFICANT HAZARD THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature HAZ-PDF-1 (Artificial Turf), below.	None required	Less Than Significant
SIGNIFICANT HAZARD THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS:	Not applicable	See Mitigation Measures HAZ-MM-1 (Soils Management Plan) and HAZ-MM-2 (Health & Safety Plan), below.	Less Than Significant with Mitigation

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
HAZARDOUS CONDITIONS WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL			
<i>Construction</i>	Not applicable	See Mitigation Measures AQ-MM-1 (Construction Equipment) and HAZ-MM-1 (Soils Management Plan), below.	Less Than Significant with Mitigation
<i>Operation</i>	Not applicable	None required	Less Than Significant
HAZARDOUS MATERIALS SITES	Not applicable	None required	Less Than Significant
IV.I HYDROLOGY AND WATER QUALITY			
CONSISTENCY WITH WATER QUALITY STANDARDS AND WASTE DISCHARGE REQUIREMENTS			
<i>Construction</i>	Not applicable	See Mitigation Measure HAZ-MM-1 (Soils Management Plan), below.	Less Than Significant with Mitigation
<i>Operation</i>	See Project Design Feature PDF-WS-2 (Capture and Reuse)	None required	Less Than Significant
GROUNDWATER SUPPLIES AND RECHARGE			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature PDF-WS-2 (Capture and Reuse)	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
ALTERATION OF DRAINAGE PATTERNS, EROSION, EXCEEDANCE OF STORMWATER DRAINAGE SYSTEM, OR IMPEDED FLOOD FLOWS			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION BY FLOODING, TSUNAMI, OR SEICHE			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN	Not applicable	See Mitigation Measure HAZ-MM-1 (Soils Management Plan), below.	Less Than Significant with Mitigation
IV.J LAND USE AND PLANNING			
SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO A CONFLICT WITH ANY APPLICABLE LAND USE PLAN, POLICY, OR REGULATION ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT	See Project Design Features CUL-PDF-1 to CUL-PDF-3 (Historic Resources), below.	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
IV.K NOISE AND VIBRATION			
SUBSTANTIAL TEMPORARY OR PERMANENT INCREASE IN AMBIENT NOISE LEVELS			
<i>Construction</i>	See Project Design Feature NOI-PDF-3 (Construction Hours)	See Mitigation Measures NOI-MM-1 (Noise Barriers), NOI-MM-2 (Construction Equipment Location) and NOI-MM-3 (Construction Equipment), below.	Significant and unavoidable with mitigation
<i>Operation</i>	See Project Design Features NOI-PDF-1 (Sound Walls) and NOI-PDF-2 (Sound Systems), below.	None required	Less Than Significant
GROUNDBORNE VIBRATION AND GROUNDBORNE NOISE			
<i>Construction</i>	See Project Design Feature NOI-PDF-3 (Construction Hours)	None required	Significant and unavoidable with mitigation (Vibration-Human Annoyance)
<i>Operation</i>	Not applicable	None required	Less Than Significant
IV.L-1 FIRE PROTECTION SERVICES			
FIRE PROTECTION			
<i>Construction</i>	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
<i>Operation</i>	See Project Design Feature TRAF-PDF-2 (Emergency Vehicle Warning Light), below.	None required	Less Than Significant
IV.L-2 POLICE PROTECTION SERVICES			
POLICE PROTECTION			
<i>Construction</i>	See Project Design Features POL-PDF-1 (Security) and TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature POL-PDF-2 (Security), below.	None required	Less Than Significant
IV.L-3 PARKS AND RECREATION			
CONSTRUCTION OF PARKS AND RECREATION FACILITIES			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
DETERIORATION OF PARK FACILITIES	Not applicable	None required	Less Than Significant
IV.M TRANSPORTATION AND TRAFFIC			
CONFLICT WITH A PROGRAM, PLAN, ORDINANCE OR POLICY ADDRESSING THE CIRCULATION SYSTEM, INCLUDING TRANSIT, ROADWAY, BICYCLE AND PEDESTRIAN FACILITIES	See Project Design Feature TRAF-PDF-3 (Traffic Management), below.	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
CONFLICT OR BE INCONSISTENT WITH CEQA GUIDELINES SECTION 15064.3, SUBDIVISION (B) - VEHICLE MILES TRAVELED (VMT)	Not applicable	None required	Less Than Significant
GEOMETRIC HAZARDS	Not applicable	None required	Less Than Significant
EMERGENCY ACCESS			
<i>Construction</i>	See Project Design Feature PDF-TRAF-1 (Construction Management Plan), below.	None required	Less Than Significant
<i>Operation</i>	See Project Design Feature PDF-TRAF-2 (Emergency Vehicle Warning Light), below.	None required	Less Than Significant
IV.N TRIBAL CULTURAL RESOURCES			
TRIBAL CULTURAL RESOURCES	Not applicable	None required	Less Than Significant
IV.O-1 UTILITIES AND SERVICE SYSTEMS – WATER SUPPLY			
WATER INFRASTRUCTURE			
<i>Construction</i>	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
WATER SUPPLY			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	See Project Design Features WS-PDF-1 (Artificial Turf) and WS-PDF-2 (Water Treatment System), below.	None required	Less Than Significant
IV.O-2 UTILITIES AND SERVICE SYSTEMS – WASTEWATER			
WASTEWATER INFRASTRUCTURE			
<i>Construction</i>	See Project Design Feature TRAF-PDF-1 (Construction Management Plan), below.	None required	Less Than Significant
<i>Operation</i>	Not applicable	See Mitigation Measures WW-MM-1 (Swimming Pool) and WW-MM-2 (Wastewater Discharge), below.	Less Than Significant with Mitigation
WASTEWATER TREATMENT CAPACITY			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant
IV.O-3 UTILITIES AND SERVICE SYSTEMS – SOLID WASTE			
SOLID WASTE GENERATION			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant

TABLE ES-1
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Environmental Impact	Project Design Features (PDF)	Mitigation Measures (MM)	Project Impact Determination
CONSISTENCY WITH STATE AND LOCAL SOLID WASTE STATUTES			
<i>Construction</i>	Not applicable	None required	Less Than Significant
<i>Operation</i>	Not applicable	None required	Less Than Significant

SOURCE: ESA, 2022.

As shown in Table ES-1, based on analyses contained in this Draft EIR the Project would result in significant and unavoidable temporary noise and vibration (human annoyance) impacts during construction. The implementation of project design features and/or feasible mitigation measures would not reduce these effects to less than significant levels. As such, impacts associated with temporary construction noise and vibration (human annoyance) would remain significant and unavoidable.

Other issues evaluated in the Draft EIR, in which impacts were determined to be less than significant with or without mitigation, include aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, operational noise/vibration, public services (fire, police, and parks and recreation), transportation, tribal cultural resources, and utilities and service systems.

a) Project Design Features

(1) Biological Resources

PDF-BIO-1: Prior to the issuance of any grading permit that would remove potentially suitable nesting habitat for raptors or songbirds, Harvard-Westlake School shall demonstrate and guarantee to the satisfaction of the Los Angeles Department of City Planning that either of the following have been or shall be accomplished:

1. Vegetation removal activities will be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.
2. Any construction activities that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist experienced in avian nesting bird behavior before commencement of clearing. If any active nests are detected, a buffer of 300 feet around the nest (500 feet for raptors), or as determined appropriate by the biologist based on species and site-specific conditions, will be delineated, flagged, and avoided until the nesting cycle is complete. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biological monitor to minimize impacts.

(2) Cultural Resources

CUL-PDF-1: Rehabilitation Plan. A Rehabilitation Plan will be prepared as part of the Project to ensure appropriate treatment and protection of the identified character-defining features on the Project Site. This includes the appropriate treatment of the golf ball-shaped light standards during relocation, and documentation that the rehabilitation of the clubhouse, putting green, and low brick wall with weeping mortar complies with the Secretary of the Interiors Standards for Rehabilitation (the Standards). Standards compliance is required by the City of Los Angeles Cultural Heritage Ordinance for

properties that are designated Historic-Cultural Monuments (Los Angeles Administrative Code, Section 22.171.14). The Project team will include a historic architect or qualified historic preservation consultant who meets the Secretary of the Interior's Professional Standards in Architectural History or Historic Architecture. The Rehabilitation Plan will be submitted for review and approval by the Department of City Planning, Office of Historic Resources. At a minimum, the Rehabilitation Plan will address the following:

- Appropriate measures for the relocation of the golf ball-shaped light standards.
- Appropriate measures for protecting all identified character-defining features of the Project Site during construction activity. If necessary, a physical barrier (e.g., exclusion or cyclone fencing) will be erected to separate and protect the clubhouse, and other features as needed, during construction.
- Retention and appropriate treatment of the significant characteristics of the original Ranch-style architecture and the relationship of the clubhouse within the context of the Project Site overall and its relationship to other character-defining features on the Project Site and in the surrounding neighborhood. This includes retaining the clubhouse in its historic location, and maintaining the significant features that have collectively served as the public face of the Project Site since the 1950s as identified in the Historical Report, including: the clubhouse's angled position facing Whitsett Avenue and Valley Spring Lane; the existing setback; the relationship of the clubhouse and the putting green; the mature trees; the golf ball-shaped light standards; and the low brick wall.
- Retention and rehabilitation of the distinctive features of the exterior of the clubhouse, including its original Ranch-style plan, massing, and original architectural details as identified in the Historical Report. The Project is not proposing significant additions to the clubhouse, or alterations to the building that would obscure or remove important exterior features.
- Retention and rehabilitation of the distinctive original features of the interior of the clubhouse as identified in the Historical Report.

CUL-PDF-2: Documentation. In order to memorialize the extant features of the Project Site prior to implementation of the Project, the Project Site will be documented according to Historic American Buildings Survey (HABS) Level III standards to include: sketch plan; a maximum of 40 photographs with large-format negatives that documents the Project Site overall and the relationship of the features on the Project Site, exterior and significant interior spaces of the clubhouse, and views of the associated putting green and low brick wall; and golf ball-shaped light standards; and short form historical report. The documentation will be reviewed and approved by the Department of City Planning, Office of Historic Resources. The documentation will be retained on-site, and digital copies will be offered to the following repositories: Los Angeles Public Library, Los Angeles Office of Historic Resources, and San Fernando Valley Historical Society.

CUL-PDF-3: Interpretation. Harvard-Westlake School will prepare interpretation of the history of the Project Site to be housed on-site. The interpretive program may be housed

in the clubhouse and may include historic photographs or other ephemeral materials documenting the history of the Weddington family, the development of the San Fernando Valley, and the history of the Project Site as a postwar recreational facility. A digital copy of the interpretive materials will be provided to the Department of City Planning, Office of Historic Resources and may also be made available to interested parties.

(3) Greenhouse Gas Emissions

GHG-PDF-1: Solar Voltaic System. The Project will be designed to include solar voltaic panels providing 339,000 kilo Watt-hours (kWh) per year⁶ on the roof of the gymnasium that would reduce the amount of electricity demand from City utilities.

(4) Hazards and Hazardous Materials

HAZ-PDF-1: Artificial Turf Formulation. The artificial turf fiber, backing, and underlayment installed on the Project Site will not have a lead concentration level higher than 50 parts per million as determined using a testing protocol in accordance with U.S. Environmental Protection Agency Method 30508; U.S. Environmental Protection Agency Method 6010c or alternatively Method 6020A will be used to analyze digestate.

(5) Noise and Vibration

NOI-PDF-1: The Project will include sections of solid walls and an overhead canopy above the swimming pool that will reduce noise associated with the athletic activities to the adjacent residences, as follows:

- An 8- to 10-foot-high wall along portions of the northeastern and eastern sides of Field A.
- An 8- to 11-foot-high wall along portions of the western and northern sides of Field B.
- A 30-foot solid overhead canopy above the swimming pool bleachers and pool buildings.
- An 8-foot-high solid wall along the northern edge of the tennis courts.

NOI-PDF-2: The Project's amplified sound system for special events at Field A will be installed and designed using a line-array speaker system, so as to not exceed a maximum noise level of 92 dBA (L_{eq}) at a distance of 50 feet from the amplified sound system. In addition, the stage for special events will be located at the north side of Field A, with the amplified sound system facing south in the opposite direction from the off-site sensitive uses to the north of Field A, which would reduce speaker noise at the nearest off-site sensitive uses to the north and east of Field A.

⁶ The solar voltaic panel system would supply approximately 11.5 percent of the Project's energy demand. For complete list of assumptions refer to Appendix C of this Draft EIR.

NOI-PDF-3: Project construction will be limited to Monday through Friday between 7:00 a.m. and 6:00 p.m.; and Saturdays between 8:00 and 6:00 p.m., which is within the allowable hours per Los Angeles Municipal Code Section 41.40.

(6) Police Services

POL-PDF-1: Security Features During Construction. During construction, on-site security measures will include security lighting and a construction security fence with gated and locked entry around active construction areas.

POL-PDF-2: Security Features During Operation. During operation, the Project will incorporate a security program to ensure the safety of its students, employees, and spectators, as well as public users of the Project Site. The Project's security will include, but not be limited to, the following design features:

- Construction of three security kiosks: (1) a security kiosk constructed south of the tennis courts; (2) a security kiosk located in the underground parking structure; and, (3) a security kiosk located in proximity to the roundabout and at-grade parking.
- Security personnel would be present onsite 24 hours per day every day of the year, and range in numbers from two to as many as ten guards depending on the time of day and number of scheduled activities.
 - One security person would be stationed at the underground garage security kiosk throughout business hours. Patrols would be conducted at random during each guard's eight-hour shift.
 - Security patrols present north of the Project Site on Valley Spring Lane during events to enforce no neighborhood or other off-site parking or visitor drop-off.
 - Security guard placed at the pedestrian entrance on Whitsett Avenue during larger events (i.e., days on which the number of event/game attendees is expected to be 300 or more for any individual game, or concurrent games combined) to screen visitors for neighborhood parking and to return visitors to their car if inappropriately parked.
- Lighting would be provided along all pathways, around the Project's gymnasium building, in the surface parking area, and in entrance areas for security and wayfinding purposes. As required by LAMC Section 93.0117(b), exterior light sources would be designed such that they would not cause more than two foot-candles of lighting intensity or generate direct glare onto nearby sensitive uses (i.e., residential uses).
- North Hollywood Community Police Station would be provided with diagrams showing access to each portion of the Project Site.
- Installation of and monitoring of closed circuit television (CCTV) cameras.

(7) Transportation

TRAF-PDF-1: Construction Management Plan. Prior to the issuance of any demolition permit or building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City Staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City Staff. This coordination will ensure construction activities of the concurrent related projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:

- As traffic lane, parking lane, and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, will be developed and implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Ensure that access will remain unobstructed for land uses in proximity to the Project Site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with LAFD, as necessary.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- Prohibit construction worker and equipment parking on the adjacent residential streets.

TRAF-PDF-2: A flashing red warning light(s) will be installed on the southern exit driveway within the Project Site at a point located before vehicles reach Valleyheart Drive that will hold back vehicles exiting the Project Site roundabout onto Valleyheart Drive. This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from one of the two LAFD driveways on Valleyheart Drive.

TRAF-PDF-3: On days in which event attendance is expected to surpass 300 spectators, including parents and other spectators, students will not be permitted to drive to the Project Site and will be required to use the School's shuttle service. Shuttles will follow a prescribed driving route, travelling northbound on Coldwater Canyon Avenue, turning

right at Moorpark Street, and turning right onto Whitsett Avenue. Spectators will park on the Project Site, and tickets and parking passes will be required to enter the Project Site. Spectators without a parking pass will be directed to park on the School's Upper Campus and ride the School-provided shuttles to the Project Site. Parking in the neighborhood will not be permitted and will be enforced by security personnel.

(8) Utilities and Service Systems – Water Supply

WS-PDF-1: Artificial Turf. The Project will use artificial turf on Fields A and B, which would serve to reduce water demand compared to natural grass.

WS-PDF-2: Capture and Reuse System. The Project would capture, treat, and store up to 1 million gallons of stormwater and other urban runoff at a time from the developed portions of the Project Site, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site, through a stormwater Low Impact Development (LID) capture and reuse cistern system, which will then use the treated stormwater for irrigation or water features on the Project Site.

b) Mitigation Measures

(1) Air Quality

AQ-MM-1: Construction Equipment Features: Harvard-Westlake School shall implement the following construction equipment features for equipment operating at the Project Site. These features shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features shall include the following:

- The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards or equivalent for equipment rated at 50 horsepower (hp) or greater during Project construction where available within the Los Angeles region. Such equipment shall be outfitted with Best Available Control Technology (BACT) which means a CARB certified Level 3 Diesel Particulate Filter or equivalent.
- During plan check, the Project's representative shall make available to the lead agency and South Coast Air Quality Management District (SCAQMD) a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that shall be used during any of the construction phases. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each such unit's certified tier specification, best available control technology (BACT) documentation, and CARB or SCAQMD operating permit shall be maintained on-site at the time of mobilization of each applicable unit of equipment.

- During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, and that haul trucks limit idling for loading and unloading activities to 10 minutes or less per one-way truck trip.
- Contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. All construction equipment must be properly tuned and maintained in accordance with the manufacturer's specifications. The contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. Tampering with construction equipment to increase horsepower or to defeat emission control devices shall be prohibited.
- Construction activities shall be discontinued during second-stage smog alerts. A record of any second-stage smog alerts and of discontinued construction activities as applicable shall be maintained by the Contractor on-site.

(2) Biological Resources

BIO-MM-1: Due to the presence of potentially suitable roosting habitat (ornamental trees) for special-status bat species (i.e., western yellow bat), Harvard-Westlake School shall demonstrate and guarantee to the satisfaction of the Los Angeles Department of City Planning that either of the following has been or shall be accomplished:

1. Tree removal activities shall be scheduled outside of the maternity roosting season (October 1 through February 28) to avoid potential impacts to special-status bat species.
2. Any construction or palm tree removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist experienced with bat roost biology to conduct a pre-construction (or pre-tree removal) survey, using sonic bat detectors (e.g., Anabat or Sonobat) to determine whether special-status bat species are roosting within trees that would be removed. The surveys shall be conducted at dusk and after nightfall by a biologist. If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement or provision of a suitable buffer established around the roost until roosting activities cease. Suitable buffers could include netting, canvas, or similar materials as recommended by the biologist. A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions.

BIO-MM-2: Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning a landscape plan or mitigation plan depicting replacement of an equivalent acreage of California brittlebush scrub removed at a 1:1 ratio. The sensitive natural community does not need to be dominated only by California

brittlebush, but this species shall be prevalent within the community, and the native scrub mix proposed shall use similar species as used for the Zev Greenway restoration habitat.⁷ The replacement of sensitive natural community habitat shall be planted clustered adjacent to and contiguous with the Zev Greenway, and the locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement sensitive natural community habitat areas shall be planted on-site and shall be shown on the Project's landscape plan. The restored sensitive natural community shall be monitored for five years to verify that California brittlebush scrub has been successfully restored.

BIO-MM-3: Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning a landscape plan or tree plan depicting replacement of each "non-protected" significant tree removed at a minimum 1:1 ratio. The actual mitigation requirement may be modified by the Department of City Planning dependent on their view of dead tree removals and removal of Mexican fan palms. The replacement tree locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement trees shall be planted in the Biological Study Area as shown on the Project's landscape plan.

Removal of 31 public street trees shall require a tree removal permit and mitigation plantings, which is typically a ratio of 2:1.

(3) Hazards and Hazardous Materials

HAZ-MM-1: Soil Management Plan. Prior to the issuance of grading permits, Harvard-Westlake School shall retain a qualified environmental consultant to prepare a Soils Management Plan (SMP), which shall be submitted to the Los Angeles Department of Building and Safety (LADBS) and Los Angeles Regional Water Quality Control Board (LARWQCB), as necessary, for review and approval. The SMP shall specify soil testing parameters and sampling frequency for areas within the golf course and near the location of the 500-gallon UST removed from the Project Site in 1995. Sampling, testing, and analysis shall be conducted in accordance with appropriate California and local guidelines [e.g., Department of Toxic Substances Control (DTSC), California Environmental Protection Agency (CalEPA), and LARWQCB]. Any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable State Office of Environmental Health Hazard Assessment (OEHHA) California Human Health Screening Levels (CHHSL), shall be subject to site-specific soil removal, treatment, and disposal measures included in the SMP to comply with applicable federal, State, and local overseeing agencies requirements to prevent unacceptable exposure of hazardous materials to construction workers, the environment or the public from contaminated soils

⁷ Community Conservation Solutions, The Zev Yaroslavsky L.A. River Greenway Trail Project Restoring Native Habitat Native Plant Species, 2017.

or soil vapors during construction. The SMP shall also include, but is not limited to, protocols that address the following: screening measures for soil exhibiting impacts, stockpile management, vapor suppression and dust control, surface and groundwater protection, soil stockpile sampling, and exporting of contaminated soils. Upon completion of construction-related soil disturbing activities, Harvard-Westlake School shall obtain a closure letter(s) or No Further Action (NFA) letter from the LADBS, DTSC, LARWQCB, and/or other local or State agencies, as applicable, which states that no further soils testing or remediation is required on the Project Site, including near the former 500-gallon UST that was removed from the Project Site in 1995 just south of the tennis courts near the adjacent LAFD site boundary. The closure letter and/or NFA letter(s) shall at a minimum address the on-site area, including the previously removed 500-gallon UST.

HAZ-MM-2: Health and Safety Plan (HASP): Harvard-Westlake School shall commission a HASP to be prepared in compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards (29 CFR 1910.120) and Cal/OSHA requirements (8 CCR, General Industry Safety Orders and California Labor Code, Division 5, Part 1, Sections 6300-6719) and submitted for review and approval by the LADBS. The HASP would address, as appropriate, safety requirements that would serve to avoid significant impacts or risks to workers or the public in the event that contaminated soils or elevated levels of subsurface vapors are encountered during grading and excavation. The general contractor shall be responsible for health and safety concerns not related to contaminated soils or soil vapors, such as those associated with standard construction operations (e.g., excavation stability, stockpile placement, heavy equipment operation, etc.).

(4) Noise and Vibration

NOI-MM-1: Temporary noise barriers shall be used along the western, northern, southern, and eastern property boundaries to block the line-of-sight between the construction equipment and the adjacent noise sensitive uses.

- Along the Project's western property line. The noise barrier shall provide minimum 15-dBA noise reduction (minimum 16 feet high) at the residences adjacent to the Project Site to the west (receptor location R1).
- Along the Project's northern property line. The noise barrier shall provide minimum 15-dBA noise reduction (minimum 16 feet high) to the residences to the north (receptor locations R2, R3, and R4).
- Along the Project's eastern property line. The noise barrier shall provide minimum 12-dBA (minimum 12 feet high) noise reduction to the residences and church to the east (receptor locations R5 and R6).
- Along the south side of the Project's construction area to block the line-of-sight between the construction equipment and the receptor location R7. The noise barrier shall provide minimum 8-dBA noise reduction to the receptor location R7.

These noise barriers shall be in-place during early Project construction phases (remain up to the start of building framing) and during paving when heavy equipment is used. Temporary barriers shall provide acoustically sealed gate access as needed for construction activities, deliveries, and site access by construction personnel.

NOI-MM-2: Construction equipment that would generate high levels of noise and vibration whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located at least 100 feet away from the nearest off-site sensitive land uses, or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses.

NOI-MM-3: The Project contractor shall use power construction equipment with properly operating and maintained noise shielding and muffling devices, consistent with manufacturers' standards. In addition, no impact pile driving shall be utilized; augered or drilled piles are permitted. Flexible sound control curtains shall be placed around all stationary compressors and generators, drilling apparatuses, drill rigs, and jackhammers when in use. The flexible sound control curtains shall have a minimum Sound Transmission Class (STC) rating of 25.

(5) Wastewater

WW-MM-1: The swimming pool volume shall be discharged at a rate of no more than 166,000 gallons per day.

WW-MM-2: The Project shall split the wastewater flow from the discharge of the swimming pool (50 percent of the resulting volume) into the 8-inch lines on Bellaire Avenue and Whitsett Avenue, unless an alternative split is otherwise approved by LASAN based on future detailed gauging and evaluation as part of the final approval process for the sewer capacity and connection permit.

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