V. Alternatives

1. Introduction

Under California Environmental Quality Act (CEQA), and as indicated in California Public Resources Code (PRC) Section 21002.1(a), the identification and analysis of alternatives to a Project is a fundamental aspect of the environmental review process and is required to ensure the consideration of ways to mitigate or avoid the significant environmental effects of a Project. Specifically, Public Resources Code Section 21001 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects.

Guidance regarding the definition of Project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *An EIR shall describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. An EIR is not required to consider alternatives which are infeasible.*

The State *CEQA Guidelines* emphasize that the selection of Project alternatives be based primarily on the ability to reduce significant impacts relative to the Project, "even if these alternatives would impede to some degree the attainment of the Project Objectives, or would be more costly."[1] The State *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

In selecting Project alternatives for analysis, potential alternatives should be feasible. The State *CEQA Guidelines* Section 15126.6(f)(1) explains that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should*

1 CEQA Guidelines Section 15126.6(b).
2 CEQA Guidelines Section 15126.6(f).

consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The State CEQA Guidelines require the analysis of a "no Project" alternative and, depending on the circumstances, evaluation of alternative location(s) for the Project, if feasible. An environmentally superior alternative is to be identified from among the alternatives evaluated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the "no Project" alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.[3]

Section 15126.6(d) of the State CEQA Guidelines states that alternatives analysis need not be presented to the same level of detail as the assessment of the Project. Rather, the EIR is required to provide sufficient information to allow meaningful evaluation, analysis and comparison with the Project. If an alternative would cause one or more significant impacts in addition to those of the Project, analysis of those impacts is to be discussed, but in less detail than for the Project.

2. Objectives of the Project

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the School and the Lead Agency. Section 15124(b) of the CEQA Guidelines states that a project description shall contain "a statement of the objectives sought by the proposed project," and further states that "the statement of objectives should include the underlying purpose of the project."

The underlying purpose of the Project is 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. The Project's specific Project Objectives are as follows:

1. Develop a state-of-the-art indoor and outdoor athletic and recreational facility to support the School's existing athletic programs and co-curricular activities, including basketball, soccer, football, track and field, tennis, swim, water polo, volleyball, fencing, weight training, dance, yoga, physical fitness, and wrestling programs.
2. Provide opportunities for shared use of a variety of types of recreational facilities and activities for the community.
3. Provide opportunities for academic use of the Project Site through science labs and outdoor classes, water quality monitoring, bird watching, and other non-athletic school activities.
4. Create new publicly accessible open space with a broad array of recreational facilities in a safe and secure environment for the surrounding community and the public to use similar to a City-owned park, while also providing a community room,

[3] CEQA Guidelines, Section 15126.6(e)(2).

café, and indoor and outdoor areas for public gatherings, performances, and occasional special events.

5. Increase public access to and enhance the adjacent Los Angeles River and Zev Greenway through a network of publicly accessible pathways, a new direct connection to the Zev Greenway, and a landscape plan that would restore native plant communities, create habitat for various species, and support the goals of the Los Angeles River Improvement Overlay District Ordinance, the Los Angeles River Revitalization Master Plan, and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.
6. Implement a tree planting program that substantially increases the number of trees on the Project Site with native and RIO-compliant tree species, while removing invasive exotic and non-RIO compliant tree species.
7. Promote compatibility with the surrounding neighborhood through a design that (1) includes mature trees and extensive landscaping along the northern edge of the Project Site; (2) reduces off-site noise effects through placement of recreational facilities internal to the Project Site, use of landscaped walls and berms, and use of canopy structures adjacent to pool and playfield areas; (3) limits light spillover and glare through use of field lights with light-emitting diode (LED) technology, timer controls, and shields that comply with LAMC and RIO requirements; (4) provides ample on-site parking and prohibits off-site parking; and (5) maximizes public safety through 24-hour, seven-day a week on-site security, monitored points of entry, and enforcement of a prohibition on off-site parking.
8. Incorporate sustainable and green building design through such features as a stormwater capture and on-site reuse system to improve water quality by treating runoff from the Project Site and adjacent areas that now flows directly to the Los Angeles River; a landscape plan featuring native and RIO-compliant plant species with low to medium water demand; elimination of turf and use of artificial grass to reduce water demand and use of pesticides; solar voltaic panels and energy efficient building design; electric vehicle charging stations; and bike facilities.
9. Retain and rehabilitate the existing clubhouse with café, associated putting green, low brick retaining wall, and golf ball-shaped light standards for public use and leisure to convey their historic value as character defining features of the Historic-Cultural Monument, the Studio City Golf and Tennis Club (now Weddington Golf & Tennis), as a post-World War II recreational facility and as an important local example of Ranch style architecture.

3. Overview of Selected Alternatives

As presented in Chapter II, *Project Description*, of this Draft EIR, the Project would repurpose the Project Site for use as an athletic and recreational facility to supplement the School's existing, space-constrained athletic facilities, and to provide open space and recreational facilities to community members in a manner that is inspired by and appropriately models the City's objectives for River-associated developments. Proposed recreational facilities would include a two-story, 80,249-square foot multi-purpose gymnasium; two athletic fields; a 52-

meter swimming pool; and eight tennis courts. Lighting and seating or bleachers would be provided for the athletic fields, the swimming pool, and tennis courts. The Project would also provide 5.4 acres of publicly accessible open space and trails. The existing clubhouse, café, putting green, and low brick retaining wall around the putting green would be retained and open to the public. The Project would also include a 503 parking space below-grade parking structure in the eastern portion of the Project Site, and a one million-gallon stormwater capture and reuse system.

As described above, according to State CEQA Guidelines Section 15126.6(a) the purpose of analyzing project alternatives is to identify alternatives that "…would avoid or substantially lessen any of the significant effects of the project…" As shown in Chapter IV, *Environmental Analyses*, of this Draft EIR, the Project would not have significant long-term impacts due to Project operations that would require consideration of alternatives that would reduce such impacts. However, the Project would have significant and unavoidable noise impacts during the Project's construction activities that cannot be fully mitigated through feasible noise control measures. The following alternatives to the Project were selected to inform evaluation of the Project in light of the significant and unavoidable environmental impact of the Project (i.e., temporary construction noise), the objectives established for the Project (listed above), the feasibility of the alternatives considered, and public input received during the scoping period:

- **Alternative 1 - No Project/No Build Alternative:** Under the No Project/No Build Alternative, the Project would not be developed. The current Weddington Golf and Tennis facility would discontinue operation.
- **Alternative 2 - At Grade Parking:** Alternative 2 would eliminate the Project's subterranean garage and stormwater capture and reuse system. All parking would be provided at grade, with Field A located on an elevated structure above the at-grade parking area.
- **Alternative 3 - Reduced Density/ Programming**: Alternative 3 would eliminate the Project's subterranean garage and stormwater capture and reuse system; the tennis courts would be eliminated and the hours of operation available for outdoor activity would be reduced.
- **Alternative 4 - No Public Use/No Public Events**: Alternative 4 would eliminate the Project's stormwater capture and reuse system and eliminate public access to the Project's open space and recreational facilities.

Alternative 1 is a No Project/No Build Alternative pursuant to CEQA Guidelines Section 15126.6(e). Alternatives 2, 3 and 4 were developed pursuant to CEQA Guidelines Section 15126.6(a). The four Alternatives are summarized and compared to the Project in **Table V-1**, *Overview of the Project Alternatives,* below. The four Alternatives are described in greater detail in Section 6, *Analysis of Alternatives*, below.

TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES

Component	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density/ Programming	Alternative 4: No Public Use/ No Public Events
Subterranean Parking?	Yes 503 spaces	No 0 spaces	No 0 spaces	No 0 spaces	Yes 503 spaces
At Grade Parking	29 spaces	0 spaces	532 spaces	430 spaces	29 spaces
Stormwater Capture and Reuse System	Yes	No	No	No	No
Tennis Courts with Bleachers/Lighting	Yes	No	Yes	No	Yes
Gymnasium	Yes	No	Yes	Yes	Yes
Swimming Pool with Bleachers/Lighting	Yes	No	Yes	Yes	Yes
Field A with Bleachers/Lighting	Yes	No	Yes (Elevated Field)	Yes	Yes
Field B with Bleachers/Lighting	Yes	No	Yes	Yes	Yes
Publicly accessible Open Space	5.4 acres	0	5.4 acres	<3 acres	0
Public Access to Coffee Shop/Putting Green/Brick Wall/Clubhouse	Yes	No	Yes	Yes	No
Soil Export (in cubic yards)	250,000	0	123,223	90,100	238,100
Soil Export Haul Truck Trips	35,714	0	17,604	12,872	34,014
Construction Duration	30 months	0	26 months	19 months	28 months

SOURCE: ESA, 2021.

4. Alternatives Considered and Rejected

The State *CEQA Guidelines* Section 15126.6(c) recommends that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the State *CEQA Guidelines*, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic Project Objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts, such as the Project's significant and unavoidable construction noise impacts. Alternatives to the Project that have been considered and rejected as infeasible are discussed below.

Alternative Project Site. State *CEQA Guidelines* Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

The factors that may be considered when addressing the feasibility of an alternative site are suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

In order for the Project to satisfy the Project Objectives, a property would need to be of sufficient size to accommodate two playing fields, tennis courts, a pool, all with respective bleachers, and a gymnasium that would provide for recreational practice and instruction, as well as allow for competitive meets with available spectator seating and adequate on-site parking to preclude off-site parking. The other criteria for the Project include relatively close proximity to the existing Harvard-Westlake's Upper Campus on Coldwater Canyon Avenue in Studio City (occupied since 1937) and a site with level topography to allow for the development of the contemplated recreational facilities. Proximity is a criteria factor because of the need for daily commuting from the Upper Campus, as it relates to higher daily vehicle miles. The Project Site is the only nearby site in proximity to Harvard-Westlake's Upper Campus with the appropriate topography and size to accommodate the School's proposed recreational facilities. Although the 17.2-acre Project Site would have enough space to allow 5.4 acres of additional open space, this still indicates that an acreage of approximately 12 acres would be required to allow the proposed recreational facilities. No other location with adequate acreage and topography exists within close proximity to the School's Upper Campus.

Another important factor in the proposed use of this site is that, in addition to convenience and topography, the Project Site is owned by Harvard-Westlake School. The School does not own or have the current opportunity to own another similar site within the nearby area.

Even if there were a potential site near Harvard-Westlake's Upper Campus that would meet the Project's needs, in the context of the area's dense urban character, it is expected that an alternative location would also likely be near other residential uses and, thus, result in similar significant and unavoidable construction-related noise impacts as at the Project Site. Therefore, it is unlikely that an alternative location would avoid or reduce the Project's significant and unavoidable construction impacts to less than significant levels. Accordingly, given the nature of the Project's significant unavoidable impacts, evaluation of an alternative location was not pursued as it would be likely to shift impacts to another location rather than helping to avoid or substantially lessen the significant effects of the Project. In conclusion, the development of the Project at an off-site location would not be feasible based on CEQA criteria and an off-site location is not given further consideration as a Project Alternative.

Alternative Use. Development of the Project Site with uses not consistent with the Project Site's underlying agricultural zones, such as light or heavy industrial uses, would not achieve the objectives of the Project and would not be appropriate within the context of the surrounding residential and commercial community. An alternative use dismissed as not feasible was the development of housing and reconfiguration of the existing golf facilities, which was contemplated in a prior proposal for the Project Site, since it would not meet any of the Project Objectives.

Alternative Project Site Designs/Reduced Development Intensity. A comment received in response to the Notice of Preparation included retaining the existing driving range. Retaining the driving range would constrain the area available for the development of the indoor and outdoor athletic and recreational program envisioned in the Project Objectives 1 through 3. The proposed recreational and athletic facilities would be reduced in size, in which case the Project would not meet Project Objectives 1 through 3. In order to meet the Project's basic objectives and retain proposed facilities, facilities would need to be redesigned and relocated within the Project Site. With the constraint caused by the retention of the driving range and relocation of facilities, the 5.4 acres of publicly accessible open space for pathways and park-like setting would be substantially reduced or eliminated. Under this circumstance, the Project would not meet Project Objectives 4 and 5 to provide publicly accessible pathways and a parklike setting for the surrounding community. Further, the existing driving range, at a length of 220 yards, is short enough that golfers are regularly able to hit golf balls over the range netting. Locating other popular recreational facilities at the end of the driving range, particularly those used by students, spectators, and the general public, would result in an unsafe condition.

An alternative design evaluated and dismissed as not feasible was the use of natural turf fields instead of the Project's artificial turf fields. This alternative was considered to result in a much higher water demand than the Project, as well as requiring the use of fertilizers, pesticides, and herbicides, which could adversely impact the public and the environment.

Other on-site alternatives to reduce intensity of development that were considered and rejected include the development of one full athletic field with a track and a smaller athletic field (generally a 50-to 60-yard athletic field). This type of alternative was rejected because it would not fully meet the Project Objectives and the reduction in playing field area would compromise conditioning, training, and practice activities. Other changes to potentially reduce the intensity of operation activity, including the use of Fields A and/or B for practice only, with competitions relegated to the tennis, pool, and gym sports, and use of the Project Site for academic purposes only were also rejected since these changes would result in the Project not meeting the Project Objectives related to supporting the School's athletic programs and co-curricular activities. Such operational changes and/or reduction in facilities would also not materially reduce the Project's significant and unavoidable construction noise impacts.

As shown above these alternatives for reducing or eliminating the significant impacts of Project construction were considered and rejected because they failed to meet basic

Project Objectives or created additional impacts. These alternatives were also rejected as necessary to address operational impacts because the Draft EIR determined that the Project would not result in any significant operational impacts.

5. Analysis Format

In accordance with State *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project's Objectives, identified in Chapter II, *Project Description*, of this Draft EIR, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

1. A description of the alternative.
2. The net environmental impacts of the alternative before and after implementation of feasible mitigation measures for each environmental topic area analyzed in Chapter IV of this Draft EIR are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the Project's construction phase, and impacts that would occur during the Project's operation phase.
3. Post-mitigation and non-significant environmental impacts of the alternative and the Project are compared for each environmental topic area. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more than the Project, the comparative impact is said to be "greater." Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar." The evaluation also documents whether compared to the Project an impact would be entirely avoided, whether a significant impact could be reduced to a less than significant level, or whether a significant unavoidable impact would be feasible to mitigate to a less than significant level.
4. The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project Objectives are attained by the alternative.

At the end of the section a relative comparison of the alternative's impacts and consistency with Project Objectives is provided. Pursuant to CEQA Guidelines Section 15126.6(e)(2) an "Environmentally Superior Alternative" is identified.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the 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. Periodic trips to the Project Site would occur for limited maintenance and/or security checks, as needed.

(2) Environmental Impacts

(a) Aesthetics/Visual Resources

(i) Light and Glare

(a) Construction

The No Project/No Build Alternative would not involve any construction activity and no construction lighting would occur. As such, the No Project/No Build Alternative would result in no impact with respect to construction lighting. As discussed in Section IV.A, *Aesthetics*, of this Draft EIR, during Project construction, existing evening light sources, such as tennis court lighting, would also be discontinued. Under the Project, construction would take place primarily during daylight hours in accordance with Los Angeles Municipal Code (LAMC) Section 41.40 requirements, and any construction lighting would be for security purposes only. Because of minimal lighting during the construction phase, Project impacts related to light and glare would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to construction lighting, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued and no lighting for recreational activities would occur. Some nighttime security lighting may be maintained under this Alternative. Because the No Project/No Build Alternative would eliminate the existing recreational lighting, lighting impacts would be reduced compared to existing conditions and as such, a less than

significant impact would occur under the No Project/No Build Alternative. As evaluated in Section IV.A, *Aesthetics*, of this Draft EIR, during operation, the Project would implement a lighting program for the proposed athletic fields, pool, and tennis courts, LED scoreboards for the fields and pool area, security lighting for pathways and courtyards, and building lights for the gymnasium. Under the Project, the golf ball-shaped light standards would be relocated and fitted with optic control to reduce glare and the 128 existing, high-glare (500-watt flood lights) for the existing tennis courts would be removed. Lighting for the driving range would also be removed from on top of the driving range canopy. These lights consist of flood lights directed onto the sod range. The Project's lighting program would not exceed LAMC light and glare standards, including River Improvement District Overlay (RIO) standards of maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the Project Site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site boundary. As such, the Project's impacts related to light and glare would be less than significant. However, because the No Project/No Build Alternative would result in less nighttime lighting than the Project, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

The No Project/No Build Alternative would not involve construction or generate any new pollutants that would exceed South Coast Air Quality Management District (SCAQMD) or California Air Resources Board (CARB) standards. As such, the No Project/No Build Alternative would have no impact with respect to emissions exceeding air quality management plan standards. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, During its construction phase, the Project would comply with SCAQMD emissions control regulations and CARB requirements to minimize short-term emissions from on- and off-road diesel emissions. With implementation of Mitigation Measure AQ-MM-1, impacts related to the timely attainment of air quality standards or interim emission reductions specified in the Air Quality Management Plan (AQMP) would be reduced to below threshold levels. In addition, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based. Since its localized construction emissions would be less than significant without mitigation, and its regional construction emissions would be less than significant with implementation of the required mitigation measure, the Project would not obstruct implementation of the 2016 AQMP. Overall, potentially significant impacts related to the potential to conflict with or obstruct the implementation of the applicable air quality plan under the Project would be reduced to less than significant with implementation of Mitigation Measure AQ-MM-1. However, because the No Project/No Build Alternative would not involve any construction activities at the Project Site and would have no impact

with respect to the AQMP, impacts related to the AQMP would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. As such, the No Project/No Build Alternative would not generate new emissions, except those associated with limited maintenance activities (i.e., vehicle trips, small equipment). This Alternative would largely eliminate emissions associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to consistency with the AQMP. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, the Project would generate emissions that would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during operation. As such, Project impacts with respect to AQMP consistency would be less than significant. Because both the No Project/No Build Alternative and the Project would similarly comply with the AQMP, impacts would be similar.

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

The No Project/No Build Alternative would not involve construction or generate any new criteria pollutants and would have no impact related to criteria pollutants. Conversely, the Project's construction activities have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment that would potentially increase the frequency or severity of an existing violation. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, construction could cause or contribute to new violations for exceedance of regional NO_X emissions. Construction emissions would not exceed the SCAQMD regional significance thresholds for VOCs, CO, SO2, PM10, and PM2.5. Implementation of Mitigation Measure AQ-MM-1, which would require machinery and vehicle emissions controls, would reduce short-term and temporary NO_X emissions, including emissions from haul trucks during the grading activities, to below the regional emission significance threshold. As such, with this mitigation measure, Project impacts would be less than significant. However, because the No Project/No Build Alternative would not involve any construction activity and would have no impact relative to threshold standards, the No Project/No Build Alternative would have less impact than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued, with the exception of limited maintenance activities. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the

public. As such, the No Project/No Build Alternative would not generate substantial emissions that could result in a cumulatively considerable increase in criteria pollutants for which the region is in non-attainment under federal or State standards. This Alternative would largely eliminate emissions and criteria pollutants associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to criteria pollutants. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, the Project's operational mobile, stationary, and area source criteria pollutants emissions would not exceed the SCAQMD thresholds of significance. Therefore, regional operational emissions impacts would be less than significant. Because the No Project/No Build Alternative would not generate new operational emissions and eliminate emissions associated with operation of the current Project Site, impacts related to criteria pollutants would be less under the No Project/No Build Alternative than under the Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

The No Project/No Build Alternative would not involve any construction activity or generate any localized construction emissions and would have no impact relative to pollutant concentrations. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, the Project's maximum daily localized emissions would not exceed the SCAQMD localized significance thresholds and localized construction impacts would be less than significant. However, the No Project/No Build Alternative would not generate any new localized construction pollutants and would have no impact relative to threshold standards. Thus, impacts related to exposure of sensitive receptors to localized pollutant concentrations would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. As such, the No Project/No Build Alternative would not generate localized emissions that would expose sensitive receptors to substantial pollutant concentrations. Rather, this Alternative would largely eliminate localized emissions associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to localized emissions. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, the Project's daily localized emissions of NO_X, CO, PM10, and PM2.5 related to energy use and use of coatings, consumer products, and landscaping products would be substantially less than the SCAQMD's significance thresholds, and impacts would be less than significant. Because the No Project/No Build Alternative would not generate any new operational pollutants and eliminate emissions associated with operation of the current Project Site, impacts related to exposure of sensitive receptors to localized concentration of pollutants would be less under the No Project/No Build Alternative than under the Project.

(iv) Carbon Monoxide Hotspots

The No Project/No Build Alternative would not generate vehicle trips, with the exception of limited periodic maintenance trips, and, as such, would contribute negligible emissions to carbon monoxide (CO) hotspots in the area's street intersections. This Alternative would largely eliminate emissions associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to CO hotspots. The most heavily impacted intersection in the area with the potential to result in carbon monoxide hotspots is Coldwater Canyon Avenue at Ventura Boulevard. Analysis of this intersection provided in Section IV.B, *Air Quality*, of this Draft EIR demonstrated that, during operation, Project vehicle trips would not contribute to the formation of CO hotspots that would exceed threshold standards at this location. Impacts related to CO hotspots would be less than significant. Because construction traffic would be less than under operation, impacts during construction would also be less than significant. Since the No Project/No Build Alternative would generate only periodic vehicle trips and would eliminate emissions associated with operation of the current Project Site, impacts related to CO hotspots would be less under the No Project/No Build Alternative than under the Project.

(v) Toxic Air Contaminants

(a) Construction

The No Project/No Build Alternative does not anticipate a future use of the Project Site that would require the use of heavy construction equipment or demolition of existing facilities. As such, the No Project/No Build Alternative would have no impact relative to temporary toxic air contaminant (TAC) emissions. Under the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, TAC emissions associated with diesel particulate matter (DPM) emissions from heavy construction equipment would occur during the construction phase. TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (approximately 30 months), Project construction would not result in a long-term exposure. Hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, could be exposed during demolition. If present, the hazardous materials are required to be managed and disposed of in accordance with applicable laws and regulations. The nearest residential air quality sensitive receptors are located adjacent to the Project Site to the east, north and west. Based on the short-term duration of Project construction and compliance with regulations that would minimize emissions, such receptors would not be exposed to substantial TAC concentrations. Project impacts would be less than significant. However, because the No Project/No Build Alternative would not require any construction or demolition activity and would have no impact related to TAC concentrations, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would not generate new vehicle or truck trips and would eliminate emissions associated with operation of the current Project Site. As such, impacts under the No Project/No Build Alternative related to TAC emissions would be less than significant. As evaluated in Section IV.B, *Air Quality*, of this Draft EIR, the Project would not include any regular heavy truck use during operation and would generate only limited amounts of diesel emissions from mobile sources that would not exceed the SCAQMD's project screening criteria of 100 trucks per day, and would have a less than significant impact relative to TAC emissions. The Project is expected to generate minimal emissions from sources such as consumer products and architectural coatings. Also, Project impacts related to the inhalation of vapors and particulates in the air space above an artificial turf field, ingestion of artificial turf products, and dermal contact with artificial turf products would be less than significant because evidence does not support a conclusion of a significant increase in health risks. Thus, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the Project's uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled, and would not exceed the SCAQMD significance threshold. Therefore, impacts would be less than significant. Because the No Project/No Build Alternative would not generate new vehicle or truck trips and would eliminate emissions associated with operation of the current Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(c) Biological Resources

(i) Candidate, Sensitive, or Special Status Species

The No Project/No Build Alternative would not involve any changes within the Project Site that would require the removal or replacement of any trees or other vegetation or wildlife habitat. By closing the Project Site, there would be no direct impacts to candidate, sensitive, or special status plant or wildlife species. Also, indirect impacts to wildlife species would be reduced compared to existing conditions with the elimination of the operation of existing recreational activities on the Project Site. As such, the No Project/No Build Alternative would have a less than significant impact on plant and wildlife species.

As evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, Project construction would result in the direct removal and replacement of a number of ornamental, non-native and, in some cases, invasive tree species and other common ornamental plant species. No candidate, sensitive, or special status plant species would be directly impacted by Project construction. Indirect impacts to special status plant species during Project construction and operation would be limited, if any, such that indirect impacts would be less than significant.

Common and non-indigenous wildlife species that would be temporarily displaced during Project construction, with the exception of a western yellow bat species (species of

special concern), do not meet the significance threshold of candidate, sensitive, or special status wildlife species. Impacts on the western yellow bat during construction would be potentially significant and, as such, Mitigation Measure BIO-MM-1 would be implemented to provide for protection of the western yellow bat's roosting habitat. With this mitigation measure, the Project's impact on candidate, sensitive, or special status wildlife species during construction would be reduced to a level that is less than significant. Operation of the Project would result in no direct impacts to candidate, sensitive, or special status wildlife species. During operation, indirect impacts to special status bat species associated with a change in the on-site ambient lighting would be low and minimal operational lighting impacts would not diminish the chances for long-term survival of a special status bat species. Further, a change in the on-site operational noise levels and associated human activities would be low and would not diminish the chances for long-term survival or significantly impact special status bat species. Therefore, the Project's operational indirect impacts to candidate, sensitive, or special status wildlife species would be less than significant. Because the No Project/No Build Alternative would have no direct impacts on candidate, sensitive, or special status plant or wildlife species, as well as reduce indirect impacts to wildlife species, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Riparian Habitat and Other Sensitive Communities

The No Project/No Build Alternative would not involve any changes within the Project Site that would require the removal or replacement of any trees, vegetation, or natural habitat. As such, the No Project/No Build Alternative would have no impact on riparian habitat or other sensitive communities. The off-site portion of the Biological Study Area along the Zev Greenway supports 0.88 acre of California brittlebush scrub, a sensitive natural community. As evaluated in Section IV.C, *Biological Resources*, of this Draft EIR the Project's river connection trail, river fence, and river overlook would impact 0.14 acres of recently restored California brittlebush scrub, which comprises 16 percent of the off-site sensitive natural community. Although impacts would be limited, direct impacts to this sensitive natural community would be potentially significant and, as such, Mitigation Measure BIO-MM-2 would be implemented to replace removed brittlebush scrub on a 1:1 ratio. Therefore, with this mitigation measure, the Project's impact on sensitive communities would be reduced to a level that is less than significant. Because the No Project/No Build Alternative would have no impact relative to sensitive communities, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Movement of Wildlife or Nursery Sites

The No Project/No Build Alternative would not involve any changes within the Project Site that would require the removal of natural habitat providing for the movement of wildlife or nursery sites. The No Project/No Build Alternative would not impede wildlife movement, wildlife corridors, or wildlife breeding. Further, by closing the Project Site and eliminating the existing on-site recreational activities, the Project Site could be utilized by nesting birds to a greater extent than under existing conditions. As such, the No Project/No Build

Alternative would have a less than significant impact on these biological resources. Under the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, since the Biological Study Area does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s), no impacts would occur to regional movement. Although implementation of the Project would result in temporary disturbances to local wildlife movement within the Biological Study Area with the removal of landscape trees that may be used by birds and bats, those species are adapted to urban areas and would be expected to persist on-site following construction because a significant number of native replacement trees (a net increase of 153 trees compared to existing conditions) would be planted on-site and additional native shrub habitat would be planted that would provide habitat value not currently existing on-site by expanding the habitat, creating a greater native seed source, and providing a larger buffer from non-native ornamental landscaping in the surrounding developed areas. Therefore, Project impacts on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors would be less than significant. Nonetheless, Project construction activities could potentially disturb songbird and raptor nests and significantly impact these biological resources. Project Design Feature BIO-PDF-1 would be implemented to demonstrate compliance with regulatory requirements for nesting bird protection, and Mitigation Measure BIO-MM-1 would be implemented to reduce any direct impacts to nesting birds and roosting bat species. Therefore, with these mitigation measures, the Project's impact on nursery sites would be reduced to a level that is less than significant. Because the No Project/No Build Alternative would have no direct impact relative to wildlife corridors and nursery sites and possibly increase the potential for nesting birds to utilize the Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(iv) Conflict with Policies or Ordinances Protecting Biological Resources

The No Project/No Build Alternative would not involve any changes within the Project Site that would require the removal of natural habitat. As such, the No Project/No Build Alternative would have a less than significant impact related to conflict with policies or ordinances protecting biological resources. As evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, the Project would provide publicly accessible recreational and open space uses in the Biological Study Area while improving access to connect these uses to the adjacent Los Angeles River, which would be consistent with the City's Open Space Element and the RIO District Ordinance. The Project's plant materials would consist entirely of native plants that have low to medium water demand, and landscape design includes the maintenance and planting of healthy trees that are consistent with the RIO District Ordinance and Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The Project includes an underground stormwater capture and reuse system that would collect and treat water originating from within the Project Site, as well as stormwater originating from within the 39-acre residential neighborhood to the north of the Project Site. This treatment would support improving the health of the City's

watersheds, which is a goal of the RIO District Ordinance. Because the Project would not conflict with the City's policies and ordinances protecting biological resources, impacts would be less than significant. Because the No Project/No Build Alternative would not include the increased use of native plants, access to the Los Angeles River, and the Project's beneficial capture, treatment and reuse stormwater system, impacts relative to conflicts with policies or ordinances protecting biological resources would be greater under the No Project/No Build Alternative than under the Project.

(v) City-Protected and Non-Protected Significant Trees and Shrubs

The No Project/No Build Alternative would not involve any changes within the Project Site that would require the removal of trees and shrubs on-site or within the public right-of way. As such, the No Project/No Build Alternative would have no impact related to City-protected and non-protected significant trees and shrubs. As evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, the Project would require the removal of 209 non-protected significant trees (trees over 8 inches in "diameter-at-breast height" or DBH) and 31 City-protected public street trees. The Project would, therefore, result in a potentially significant impact related to City-protected and non-protected trees. Mitigation Measure BIO-MM-3 would be implemented to require replacement of all non-protected significant trees at a minimum 1:1 ratio and street trees at a ratio of typically 2:1. The Project would result in a net increase of 153 trees compared to the existing 421 inventoried trees within the Biological Study Area. Therefore, with this mitigation measure, the Project's impact on City-protected trees and non-protected significant trees would be reduced to a level that is less than significant. However, because the No Project/No Build Alternative would have no impact to on- or off-site trees, impacts would be less under the No Project/No Build Alternative than under the Project.

(d) Cultural Resources

(i) Historical Resources

The No Project/No Build Alternative would not involve any direct modifications to the existing historical buildings or structures, the Site's recreational open space character, or the putting green at the Project Site and, as such, would have no direct impact on historical resources. Potentially, as the Project Site would be vacant, some degradation of the existing landscaping would likely occur without regular maintenance. Further, by fencing off and closing the Project Site, the recreational character and setting of the Project Site in relation to the clubhouse would be altered, but the Project Site's historical resources would otherwise be maintained in their current status. As such, less than significant impacts regarding historic resources would occur under the No Project/No Build Alternative. As discussed in Section IV.D, *Cultural Resources*, of this Draft EIR, the Project would retain the recreational character of the Project Site, and would maintain 5.4 acres of open space. The Project, per Project Design Feature CULT-PDF-1, would retain and provide 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 of the Project Site. This includes retaining the clubhouse in its historic location, and maintaining the character-defining features, including the putting green, low brick retaining wall, clubhouse, and relocating the golf ball-shaped light standards in the northeastern portion of the Project Site, which have been historically visible from the public right-of-way. Further, Project Design Features CUL-PDF-2 and CUL-PDF-3 require that the extant features of the Project Site be documented in a Historic American Buildings Survey (HABS) survey and that an interpretive exhibit displaying the history of the Project Site to be housed on the Project Site, respectively. With the Project Design Features in place, Project impacts on historic resources would be less than significant. Because the extent of changes in relation to the setting of the Project Site around the clubhouse would be less under the No Project/No Build Alternative compared to the Project, impacts related to historical resources would be less under the No Project/No Build Alternative than under the Project.

(ii) Archaeological Resources

The No Project/No Build Alternative would not require any ground disturbance or excavation activities that would potentially encounter previously undiscovered archaeological resources and, as such, would have no impact related to archaeological resources. As discussed in Section IV.D, *Cultural Resources,* of this Draft EIR*,* excavation for the Project, would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet below ground surface (bgs). As such, Project excavation activities have the potential to encounter previously undiscovered subsurface archaeological resources. Should archaeological resources be inadvertently encountered, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, Project construction would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because the No Project/No Build Alternative would have no impact related to archaeological resources, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Human Remains

The No Project/No Build Alternative would not require any ground disturbance or excavation activities that would potentially encounter human remains and, as such, would have no impact related to human remains. As discussed in Section IV.D, *Cultural Resources,* of this Draft EIR excavation for the Project would be required for the gymnasium, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Excavation activities, as well as other ground disturbing construction activities (i.e., grading) have the potential to encounter human remains. If any human remains are encountered, notification of the

County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of the human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, the Project's impacts related to human remains would be less than significant. However, because the No Project/No Build Alternative would have no impact related to human remains, impacts would be less under the No Project/No Build Alternative than under the Project.

(e) Energy

(i) Construction

The No Project/No Build Alternative would not involve any construction at the Project Site and, as such, would have no impact relative to energy resources. As evaluated in Section IV.E, *Energy,* of this Draft EIR, the Project would involve an approximately 30-month period of construction activity. The Project is not expected to consume natural gas during construction, but would use electricity as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. The Project's export of 250,000 cubic yards of excavated materials, one component of construction activity, would require 35,714 haul truck trips. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Construction would utilize energy only for necessary on-site activities and to transport construction materials and demolition debris to and from the Project Site. Because the Project would not increase demand for electricity, diesel, or gasoline gas that would exceed available supply or distribution infrastructure capabilities, it would not result in the broad construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Construction of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. However, because the No Project/No Build Alternative would have no impact related to energy resources as part of construction activities, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. As such, the No Project/No Build Alternative would generate a de minimis energy demand. Thus, the No Project/No Build Alternative would have a less than significant impact with respect to energy resources and infrastructure. As evaluated in Section IV.E, *Energy,* of this Draft EIR, the Project would include development of new recreational features and activity at the Project Site, which would generate energy demand. The Project's annual average operational electricity usage would be approximately 2,617,043 kWh. Natural gas demand would be approximately 1,663,510 cubic feet. Transportation would result in an annual demand of

132,955 gallons of gasoline and 14,756 gallons of diesel. Demand would be within the handling capacity of suppliers. Operation would comply with the CALGreen Code's energy saving measures. In addition, sustainability measures, such as a solar photo-voltaic array system and LED lighting, would be implemented to reduce energy demand. Operation of the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy and, as such, energy impacts would be less than significant. Because the No Project/No Build Alternative would generate a de minimis energy demand and eliminate the energy demand associated with operation of the current Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(f) Geology and Soils

(i) Geologic Hazards

The No Project/No Build Alternative would not require any new development at the Project Site or increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. As such, it would have no impact related to exacerbation of existing seismic and ground stability conditions. As evaluated in Section IV.F, *Geology and Soils,* of this Draft EIR, the Project would implement engineering controls and comply with regulations for planned excavation and construction activities that would minimize any potential site stability geologic hazards at the Project Site. Therefore, development of the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by the Project's exacerbation of existing environmental conditions. The Project's impacts related to geologic conditions would be less than significant. However, because the No Project/No Build Alternative would have no impact related to geologic conditions, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Soil Erosion or Loss of Topsoil

The No Project/No Build Alternative would not require any grading or construction activity that would result in the exposure of soil to rain or wind. As such, it would have no impact related to soil erosion or loss of topsoil. As evaluated in Section IV.F, *Geology and Soils,* of this Draft EIR, the Project would require grading and excavation activities, which would potentially result in soil erosion or loss of topsoil. The Project would generate 251,836 cubic yards of rough cut and fill (including 250,000 cubic yards of exported cut materials). Construction activities under the Project would be carried out in accordance with applicable City standard erosion control practices required pursuant to the California Building Code (CBC) and the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The Project would be required to implement a Stormwater Pollution Prevention Plan (SWPPP) with incorporated best management practices (BMPs) to control soil erosion during the Project's construction period. With compliance with applicable code and regulatory requirements, Project impacts associated with substantial erosion or loss of topsoil would be less than

significant. However, because the No Project/No Build Alternative would have no impact related to soil erosion, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Unstable Geologic Units

The No Project/No Build Alternative would not include any new construction activities or development that would expose people or structures to unstable geologic units, and would have no impact related to unstable geologic units. The Project Site is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As evaluated in Section IV.F, *Geology and Soils,* of this Draft EIR, all required excavations under the Project would be shored as required under the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. Further, as required by the Building Code, the Project would adhere to a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, Project impacts with respect to unstable geologic units would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to unstable geologic units, impacts would be less under the No Project/No Build Alternative than under the Project.

(iv) Expansive Soils

The No Project/No Build Alternative would not include any new construction activities or development that would expose people or structures to expansive soils. As such, the No Project/No Build Alternative would have no impact related to expansive soils. As evaluated in Section IV.F, *Geology and Soils,* of this Draft EIR, under the Project, compliance with standard construction and engineering practices (e.g., on-site excavation requiring suitable engineered stabilization in accordance with the CBC and proper engineering erosion control and proper engineering drainage design), addressing expansive soils through Building Code regulations pertinent to foundation stability would ensure that expansive soils or other unstable soils are removed, as necessary. As such, Project impacts regarding expansive soils would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to expansive soils, impacts would be less under the No Project/No Build Alternative than under the Project.

(v) Paleontological Resources

The No Project/No Build Alternative would not require any ground disturbance or excavation activities that would potentially encounter previously undiscovered paleontological resources, and, as such, would have no impact related to paleontological resources. As evaluated in Section IV.F, *Geology and Soils,* of this Draft EIR, under the Project, excavation would be required for the gymnasium building, pool, subterranean

parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. As such, Project excavation activities have the potential to encounter paleontological resources in previously undisturbed soils. Should paleontological resources be inadvertently encountered during construction, the City's standard condition of approval to address inadvertent discovery of paleontological resources would be enforced. With implementation of the standard condition of approval, Project construction would not cause a substantial adverse change in the significance of a paleontological resource, and impacts would be less than significant. However, because the No Project/No Build Alternative would have no impact related to paleontological resources, impacts would be less under the No Project/No Build Alternative than under the Project.

(g) Greenhouse Gas Emissions

(i) Construction

The No Project/No Build Alternative would not include the construction of any new buildings or provide for on-site occupancy of the Project Site and, as such, would have no impact relative to construction-related greenhouse gas (GHG) emissions. As evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, under the Project, hauling of approximately 250,000 cubic yards of exported excavated materials, concrete pours, deliveries, worker trips, and on-site construction equipment would result in GHG emissions. Construction activities would comply with CARB's improved engine efficiency regulations and reduced idling times, as well as SCAQMD air quality control measures that reduce GHG emissions. The Project would comply with SCAQMD's CEQA Air Quality Handbook to ensure that GHG emissions would be consistent with applicable strategies outlined to reduce construction emissions.

(ii) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. As such, the No Project/No Build Alternative would not generate GHG emissions that could have a significant impact on the environment or conflict with applicable GHG plans or policies. Rather, this Alternative would eliminate GHG emissions associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to GHG emissions. As evaluated in Section IV.G, *Greenhouse Gas Emissions,* of this Draft EIR, operation of the Project would generate GHG emissions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, the Project would not conflict with the regulations and policies and complies with or exceeds the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. The Project would also have a less-than-significant impact with respect to the urban heat island effect.

Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and project-specific impacts with regard to GHG emissions would be less than significant. Because the No Project/No Build Alternative would not generate new GHG emissions and would eliminate GHG emissions associated with operation of the current Project Site, impacts with respect to GHG emissions and conflicts with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs would be less under the No Project/No Build Alternative than under the Project.

(h) Hazards and Hazardous Materials

(i) Transport, Use, or Disposal of Hazardous Materials

(a) Construction

The No Project/No Build Alternative would not require any construction activities at the Project Site. Therefore, the No Project/No Build Alternative would have no impact related to the routine transport, use, or disposal of hazard materials during any construction activities. As evaluated in Section IV.H, *Hazards and Hazardous Materials,* of this Draft EIR, construction of the Project would involve the demolition and removal of numerous existing on-site improvements, including the tennis shack, tennis courts, court lighting, driving range features, golf course features, and paved areas. During the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions in accordance with BMPs contained in the required SWPPP. Due to the age of the clubhouse and tennis shack, which were constructed in 1955 and 1956, prior to the ban on asbestos containing materials (ACM) (banned in 1989, lead based paint (LBP) (banned in 1978), and polychlorinated biphenyls (PCBs) (banned in in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant. Impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during demolition and construction of the Project would be less than significant. However, because the No Project/No Build Alternative would not involve any construction activities, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. Limited maintenance would be required periodically at the closed Project Site, which could involve the use of small

amounts of hazardous materials, such as products for weed control and cleaning solvents. As such, the No Project/No Build Alternative would have a less than significant impact related to the routine transport, use, or disposal of hazard materials. As evaluated in Section IV.H, *Hazards and Hazardous Materials,* of this Draft EIR, operation of the Project would require the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, pesticides (for the putting green) and other household-type materials. The use of these materials would be in small quantities and in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements would reduce the potential to release contaminants. The Project would replace the golf course and other existing uses with new athletic and recreational facilities, including outdoor athletic fields utilizing artificial grass as a sustainable alternative to turf grass. The artificial turf would reduce the need to use pesticides as typically required to maintain grass playing fields. Further, no evidence or studies have demonstrated that health-related or hazardous materials impacts to the public or the environment would occur with use of the Project's artificial turf, including but not limited to inhalation risks. Therefore, the Project's impacts with respect the transport, use, and disposal of hazardous material would be less than significant. Because the No Project/No Build Alternative would use a very limited amount of hazardous materials to maintain the Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Accidental Release of Hazardous Materials

The No Project/No Build Alternative would not involve excavation, demolition or other construction activity at the Project Site. As such, the No Project/No Build Alternative would have no impact with respect to the accidental release of hazardous materials during construction. Due to the age of the clubhouse and tennis shack to be removed, which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant. As evaluated in Section IV.H, *Hazards and Hazardous Materials,* of this Draft EIR, the Project would also require grading and excavation of the Project Site, including a rough cut/fill volume of 251,836 cubic yards, with the export of 250,000 cubic yards. Such grading activities could result in the exposure of construction workers to hazardous conditions associated with contaminated soils or soil vapor due to long-term use of pesticides to maintain the golf course and a previously removed underground storage tank (UST). As such, the Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, and impacts would be potentially significant. Implementation of Mitigation Measures HAZ-MM-1, Soil Management Plan (SMP), and HAZ-MM-2, Health and Safety Plan (HASP), would reduce potentially significant impacts to the public or the environment from the release of hazardous materials released during

upset and/or accident conditions to a less than significant level. However, because the No Project/No Build Alternative would not require construction activities and have no impact related to the accidental release of hazardous materials of hazardous materials, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Use of Hazardous Materials within One-Quarter Mile of a School

(a) Construction

The Project Site is within 1.6 miles of the LAUSD Millikan Middle School, 0.39 mile from Harvard-Westlake School, and 0.58 mile from Campbell Hall School. No schools are located within 0.25 mile of the Project Site. The No Project/No Build Alternative would not involve construction activities and would have no impact to schools regarding the use of hazardous materials during construction. As evaluated in Section IV.H, *Hazards and Hazardous Materials,* of this Draft EIR, construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With incorporation of Mitigation Measure AQ-MM-1, the Project would not expose any schools to substantial TAC concentrations and, with the incorporation of Mitigation Measure HAZ-MM-1 requirements for the handling, management and disposal of any contaminated soils or soil vapors would be established that would prevent unacceptable exposure to contaminated soils or vapors at any nearby school, if encountered during construction. The Project, therefore, would have a less than significant construction impact with these mitigation measures related to the use of hazardous materials within one-quarter mile of a school. However, because the No Project/No Build Alternative would have no impact regarding to the use of hazardous materials during construction, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. No schools are located within 0.25 mile of the Project Site. Limited maintenance would be required periodically at the closed Project Site, which could involve the use of small amounts of hazardous materials, such as products for weed control and cleaning solvents. As such, the No Project/No Build Alternative would have a less than significant impact related to the use of hazardous materials within one-quarter mile of a school. As evaluated in Section IV.H, *Hazards and Hazardous Materials,* of this Draft EIR, operation of the Project would use small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, and other household-type materials, which would be contained, stored, and

used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, with compliance to applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials, and adherence to manufacturer's instructions related to handling of hazardous materials, Project impacts during operation would be less than significant. Because the No Project/No Build Alternative would involve very limited use of hazardous materials for maintenance at the Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(i) Hydrology and Water Quality

(i) Water Quality Standards and Groundwater Quality

(a) Construction

The No Project/No Build Alternative would not involve construction activities and, as such, would not result in surface or groundwater exposure to pollutants during construction activities. As such, it would have no impact related to surface water and groundwater quality. As evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, construction activities under the Project, such as earth moving, maintenance and operation of construction equipment, potential dewatering, and handling, storage, and disposal of materials, could contribute to pollutant loading in stormwater runoff from the construction site. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events, and on-site water activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. However, the Project's potential impacts to water quality would be reduced to less than significant levels through compliance with regulatory requirements and BMPs provided under the required SWPPP, and Building Code grading procedures, which would ensure that Project runoff would not exceed water quality standards. In addition, if contaminated soils are encountered, Mitigation Measure HAZ-MM-1 would be implemented that requires preparation of a SMP. Per the SMP, any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable screening levels would 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 construction workers, the environment, or the public to hazardous materials from contaminated soils. With implementation of Mitigation Measure HAZ-MM-1, potentially significant Project surface and groundwater quality impacts during construction from contaminated soils would be reduced to a less-than-significant level. Therefore, the Project's impact with respect to construction phase water quality standards would be less than significant. However, because the No Project/No Build Alternative would result in no impacts to existing conditions, impacts with respect to water quality would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would close the Project Site and not involve new development and, as such, would maintain the existing drainage and stormwater runoff conditions. With the Project Site closed, pollutants from the Project Site's current operational activities (i.e., oil and grease from the parking lot) would not enter into the stormwater runoff from the Project Site. Thus, impacts related to surface or groundwater exposure to pollutants during operation would be less than significant under the No Project/No Development Alternative. However, the City's Low Impact Development (LID) water quality control measures are not currently applicable under existing conditions and, as such, would not be implemented under the No Project/No Build Alternative. As described in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, the Project would install a stormwater capture and reuse system for water conservation and treatment purposes, which would collect stormwater from the Project Site and a 39-acre, off-site drainage area to the north of the Project Site. This system would improve the quality of runoff, which currently flows directly into the Los Angeles River from the Project Site and the adjacent drainage area. Therefore, the Project would result in an improvement in the existing water quality of stormwater runoff from both the Project Site and the 39-acre offsite drainage area. Impacts with respect to operational water quality standards would be less than significant. Because the extent of the Project's beneficial water quality impacts would occur to a lesser degree than under the No Project/No Build Alternative, impacts would be greater under the No Project/No Build Alternative than under the Project.

(ii) Changes in Groundwater Supplies or Recharge

(a) Construction

The No Project/No Build Alternative would retain the Project Site in its existing state and would not require construction activity, dewatering, or change in existing groundwater recharge conditions. As such, No Project/No Build Alternative would have no impact related to groundwater supplies or recharge. As evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, during construction of the Project, temporary dewatering during construction activities may be required if groundwater is encountered. If required, pumps and filtration would be utilized in compliance with all applicable NPDES requirements for construction dewatering discharges. Any temporary construction dewatering would not significantly contribute to depletion of groundwater supplies or interfere with recharge and, as such, Project impacts would be less than significant. However, because the Project/No Build Alternative would have no impact related to groundwater supplies or recharge, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would retain the Project Site in its existing state and would not change existing groundwater supplies or recharge (permeability) conditions.

As such, the No Project/No Build Alternative would have no impact with respect to groundwater conditions. As evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, under the Project, the amount of impervious area on the Project Site would increase from the existing 30 percent to 59 percent upon Project buildout. However, the Project would capture, treat, and store up to one-million-gallons of stormwater at a time from the developed portions of the Project Site and adjacent 39-acre residential neighborhood through the stormwater capture and reuse system, which would then use the treated stormwater for irrigation or water features on the Project Site (refer to Project Design Feature PDF-WS-2). Even with the Project's increase in impervious area, the amount of water percolating into the underlying soils would largely be similar to existing conditions because of the Project's capture and reuse system, which would return captured and treated stormwater into the on-site soils during irrigation. Because the Project Site's underlying soils and geologic characteristics do not allow for significant groundwater recharge and because there would not be a substantial change to the amount of water that would percolate into the underlying soils compared to existing conditions, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. However, because the No Project/No Build Alternative would have no impact related to groundwater supplies or recharge, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows

(a) Construction

The No Project/No Build Alternative would not involve any new construction and, as such, would not result in a construction-related change in drainage patterns that could cause erosion, siltation, exceedance in the capacity of the existing or any planned drainage system or impeded or redirected flood flows. As such, the No Project/No Build Alternative would have no impact on existing drainage patterns. As evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, under the Project, construction activities could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, Project impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to drainage patterns, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would close the Project Site and not involve new development and, as such, would not result in any changes to existing drainage patterns which could result in erosion, siltation, exceedance in the capacity of the existing or any planned drainage system or impeded or redirected flood flows. As such, the No Project/No Build Alternative would have no impact on existing drainage patterns. As evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, under the Project, during the 50-year frequency design storm event peak flow rate, the peak flow rate of stormwater runoff from the Project Site would incrementally change from 60.93 cfs to 60.94 cfs (a 0.01 cfs or a 0.01 percent increase). This incremental change would not substantially alter the existing drainage pattern of the Project Site or surrounding area. The Project's stormwater capture and reuse system would serve to prevent on-site flooding and, at the same time, would ensure runoff discharged from the Project Site would not exceed the capacity of the municipal stormwater infrastructure during a larger storm event by capturing, storing and reusing stormwater on-site. Furthermore, through the stormwater capture and reuse system, the Project would address the localized flooding issue at the intersection of Valley Spring Lane and Whitsett Avenue, which regularly occurs during a rainfall event, as well as the stagnant water condition in the same area that frequently occurs even on dry days with the addition of a new curb inlet at the southwestern corner of Whitsett Avenue and Valley Spring Lane that would collect the stagnant water and convey it to the Project's capture and reuse system. By capturing, filtering, and reusing such stormwater, not only would at least one-third of the Project's annual landscape irrigation demand be satisfied, but vehicular and pedestrian safety would be improved by eliminating the localized flooding**.** Therefore, the Project would result in an improvement to existing hydrology and drainage conditions. Impacts with respect to operational drainage patterns would be less than significant. Since the No Project/No Build Alternative impact would not implement these improvements, the No Project/No Build Alternative would have no impact with respect to drainage conditions compared to existing conditions. Because the Project's beneficial drainage impacts would not occur under the No Project/No Build Alternative, impacts would be greater under the No Project/No Build Alternative than under the Project.

(j) Land Use and Planning

The No Project/No Build Alternative would close the Project Site, but not change the existing land use designation or zoning of the Project Site and as such, would have no impact with respect to a 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. The plans and policies applicable to the Project Site, include the SCAG 2020-2045 RTP/SCS, the City of Los Angeles General Plan Framework Element, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the Los Angeles River Revitalization Master Plan (LARRMP), and the LAMC, which includes the RIO District Ordinance (Section 13.17 of the LAMC). As evaluated in Section IV.J, *Land Use and Planning*, and land use tables in Appendix J of

this Draft EIR, the Project would not conflict with applicable plans or policies adopted to avoid or mitigate environmental effects, and would implement certain plan objectives, such as reducing VMT consistent with the 2020-2045 RTP/SCS and creation of publicly accessible open space and improved access to the Los Angeles River under the Community Plan, the LARRMP, and the RIO District Ordinance. Under the Project the existing land use and zoning designation would not change. Project impacts related to land use would be less than significant. Although the No Project/No Build Alternative would not conflict with the objectives of the applicable land use plans and policies adopted to mitigate environmental effects, it would not implement any of the objectives of the applicable land use plans compared to the Project. For this reason, impacts with respect to conflicts with applicable land use plans and policies would be greater under the No Project/No Build Alternative than under the Project.

(k) Noise and Vibration

(i) Construction

The No Project/No Build Alternative would not involve any construction activities and, therefore, would not generate construction noise or groundborne vibration impacts. As such, the No Project/No Build Alternative would have no impact with respect to construction noise and vibration. As evaluated in Section IV.K, *Noise*, of this Draft EIR, under the Project, the temporary noise levels resulting primarily from heavy-duty machinery during construction would exceed the significance threshold at off-site noise receptors, including residential uses along Bellaire Avenue (receptor R1, west of the Project Site), along Valley Spring Lane (receptor locations R2, R3 and R4, north of the Project Site), along Whitsett Avenue (receptor locations R5 and R6, east of the Project Site), and along Sunswept Drive (receptor location R7, south of the Project Site), prior to implementation of mitigation measures. In addition, Project construction noise impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp would be significant at receptor location R8. The Project would implement Mitigation Measures MM-NOI-1, MM-NOI-2 and MM-NOI-3, as applicable, to reduce noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, the Project's construction noise impacts would continue to exceed threshold levels at residential receptor locations R1, R2, R3 and R8. Therefore, the Project would result in the generation of a temporary increase in ambient noise levels that would be significant and unavoidable. For construction activities within the Project Site, groundborne vibration impacts would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be less than significant. However, Project vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp with respect to human annoyance would be significant and unavoidable at receptor location R8. In addition, the Project would result in significant and unavoidable cumulative impacts related to on-site construction equipment noise and off-site construction traffic noise, as well cumulative construction noise and vibration (human annoyance) to receptor location R8 from the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp.

Because the No Project/No Build Alternative would have no impact with respect to construction noise and vibration, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Operation

The No Project/No Build Alternative would not generate operation-related noise, with the exception of noise associated with limited periodic maintenance activities, because the existing on-site uses would be discontinued. The No Project/No Build Alternative would eliminate noise and vibration from the existing on-site uses. As such, it would have a less than significant impact with respect to operational noise or groundborne vibration. As evaluated in Section IV.K, *Noise*, of this Draft EIR, under the Project, on-site operational noise would be generated by fixed mechanical equipment, athletic activities, special events, and parking facilities. Off-site noise would occur in the form of traffic noise. The Project would implement Project Design Features NOI-PDF-1 and NOI-PDF-2. Project Design Feature NOI-PDF-1 would include sections of solid walls and an overhead canopy above the swimming pool that would reduce noise associated with the athletic activities to the adjacent residences. Per Project Design Feature NOI-PDF-2, the Project's amplified sound system for special events (e.g., movies or educational speakers) at Field A would be designed to reduce off-site noise at the nearest off-site sensitive uses to the north and east of Field A. Composite noise levels associated with all Project-related noise sources would be below the 5-dBA CNEL significance threshold, and within acceptable standards established by the City. Operational groundborne vibration impacts would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be less than significant. Therefore, Project impacts related to operational noise and vibration would be less than significant. Because the No Project/No Build Alternative would generate limited levels of noise associated with periodic maintenance activities and no noticeable vibration, impacts would be less under the No Project/No Build Alternative than under the Project.

(l) Public Services

(i) Fire Protection

(a) Construction

The No Project/No Build Alternative would not involve any construction activity that would generate a demand for fire protection and emergency medical services. As such, the No Project/No Build Alternative would not result in the addition or expansion of fire facilities and would have no impact on fire protection services. As evaluated in Section IV.L.1, *Fire Protection*, of this Draft EIR, the Project would involve construction activities that could affect fire protection and emergency medical services. The Project would implement Project Design Feature TRAF-PDF-1, to provide a Construction Management Plan to minimize impacts to vehicular and other forms of circulation during construction. Fire safety during construction would be further addressed by specific practices and procedures, including OSHA safety and health provisions, that would be implemented

during construction. With the implementation of Project Design Feature TRAF-PDF-1 and compliance with applicable safety regulations, the Project would not increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, the Project would not result in potential physical impacts associated with construction of fire facilities. Therefore, Project impacts during construction with respect to fire protection would be less than significant. However, the No Project/No Build Alternative would have no construction-related impact on fire services and, as such, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both Harvard-Westlake School and the public. The No Project/No Build Alternative would eliminate the demand for fire protection and emergency medical services generated by operation of the current on-site recreational activities. While the need for fire protection and emergency medical services under the No Project/No Build Alternative would be very low, the No Project/No Build Alternative would not involve any activity or use of the Project Site that would require the provision of new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts. As such, impacts would be less than significant. As evaluated in Section IV.L.1, *Fire Protection*, of this Draft EIR, The Project would result in the occupation of and activity at the Project Site, which would require fire protection and emergency medical services. The Project would comply with all applicable Fire Code regulations, including a sprinkler system within the gymnasium. Further, the Project Site is located adjacent to LAFD Fire Station 78 and, as such, is located within the required fire station response distance established by the LAMC. The Project Site also has adequate proximity to fire hydrants and fire flow to meet LAMC standards. In addition, the Project would provide for emergency access into the Project Site and would not substantially interfere with emergency access in the surrounding neighborhood. It would also provide a system, inclusive of Project Design Feature TRAF-PDF-2 (flashing red warning light), to maintain adequate access for emergency vehicles to enter and return to the adjacent LAFD Fire Station 78 and, thus, would not interfere with the operation of that fire station. Overall, Project operation would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Therefore, impacts to fire protection and emergency medical services during Project operation would be less than significant. Because the demand for fire protection and emergency medical services would be less under the No Project/No Build Alternative compared to the Project, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Police Protection

(a) Construction

The No Project/No Build Alternative would not involve any construction activity that would generate a demand for police protection services. The Project would result in construction activities that could affect emergency access and require police protection services. The Project would implement Project Design Feature TRAF-PDF-1, a City-reviewed Construction Management Plan, to ensure that emergency access would be maintained in the vicinity of the Project Site during construction. As evaluated in Section IV.L.2, *Police Protection*, of this Draft EIR, the Project would also implement Project Design Feature POL-PDF-1 to require construction fencing and security lighting to reduce the potential need for LAPD services. With the implementation of these features, the Project would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Project construction activities would not result in potential physical impacts to police facilities and impacts with respect to police services would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to police services, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. The No Project/No Build Alternative would eliminate the demand for police protection services generated by operation of the current on-site recreational activities. While the need for police protection services under the No Project/No Build Alternative would be very low, the No Project/No Build Alternative would not involve any activity or use of the Project Site that would require the provision of new or physically altered police protection facilities, the construction of which would cause significant environmental impacts. As such, impacts would be less than significant. As evaluated in Section IV.L.2, *Police Protection*, of this Draft EIR, the Project would result in the occupation of and activity at the Project Site, which would require police protection services. The Project's operational demand for police protection services would be largely offset by security services to be provided on the Project Site as part of Project Design Feature POL-PDF-2. Per Project Design Feature POL-PDF-2, the Project would incorporate a security program to ensure the safety of its students, employees, public users, and spectators, and include the provision of three security kiosks; 24-hour, on-site security; security lighting, and the installation and monitoring of CCTV cameras. Project Design Feature POL-PDF-2 also outlines the patrols that will be conducted on the Project Site by on-site security. With implementation of Project Design Feature POL-PDF-2, impacts on police services would be less than significant. Because the demand for police protection services would be less under the No Project/No Build Alternative compared to

the Project, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Parks and Recreation

(a) Construction

Under the No Project/No Build Alternative, the Project Site would be closed and no further recreational activity would occur at the Project Site. The closure would result in a minor impact on public parks since some existing relocated users would likely use other tennis and golf facilities in the region. As with the No Project/No Build Alternative, as evaluated in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, the Project would close existing on-site private recreational facilities during construction also resulting in the potential relocation of existing users to other golf and tennis facilities in the region. The closure would result in a minor effect on public parks since some existing relocated users would use other tennis and golf facilities in the region. Overall, the impact of the Project on parks and recreational facilities would be less than significant and similar under both the No Project/No Build Alternative and the Project.

(b) Operation

The Project Site's golf and tennis facilities would not continue in operation under the No Project/No Build Alternative. This would result in the relocation of existing golf and tennis users to other facilities. As evaluated in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, although the Project would result in a small number of relocated tennis users, weekday use of off-site courts is anticipated to be available and would not exceed the carrying capacity of the City's public tennis courts. In addition, the Project would be able to continue to host league matches as under existing conditions. Therefore, the Project is not anticipated to increase demand for use of tennis courts at a level that would foreseeably result in substantial adverse physical impacts due to the need for new or physically altered public tennis courts in order for the Los Angeles Department of Recreation and Parks (RAP) to maintain adequate service ratios. While the loss of the on-site golf facilities could pose an inconvenience for current users under the Project, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically altered public, nine-hole golf courses, in order for the RAP to maintain adequate service ratios. Furthermore, the Project would provide all-day public access to 5.4 acres of landscaped walking trails, direct access to the Zev Greenway, and public use of the community room in the gymnasium building in an area that lacks neighborhood park facilities. Other facilities, such as the multi-purpose athletic fields, swimming pool, gymnasium sports, and eight tennis courts, would be available to the public with reservations. These features would reduce demand for off-site parks and recreation uses and meet the criterion of neighborhood park uses within walking distance of the surrounding neighborhood, as well as provide the highest priority recreational uses (walking paths) and high priority uses (gymnasium and swimming pool) identified in the RAP's Citywide Community Needs Assessment for the South San Fernando Valley geographic area. Therefore, the Project would not require the need for new or physically

altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. Impacts to public parks and recreational facilities during Project operation would be less than significant.

While the No Project/No Build Alternative is not expected to require the need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, it would not offset or reduce public demand on the area's parks and recreational facilities as under the Project. For this reason, impacts would be greater under the No Project/No Build Alternative than under the Project.

(m) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

The No Project/No Build Alternative would close the Project Site and not involve new development and, as such, would not conflict with or implement any objectives related to the circulation system, transit, roadways, or bicycle and pedestrian facilities. Although the No Project/No Build Alternative would not implement transportation programs, because it would not result in any regular daily vehicle trip increases or transportation effects, it would have no impact with respect to conflicts with transportation-related programs, plans, and ordinances. As evaluated in Section IV.M, *Transportation*, of this Draft EIR, the Project would support multimodal transportation options (shuttling) and a reduction in VMT associated with the existing Project Site (consistent with LADOT's methodology which excludes the Project's VMT components related to community use), as well as promote transportation-related safety in the Project area. The Project would not conflict with policies of the Mobility Plan 2035 adopted to protect the environment and reduce VMT. The Project would also be consistent with applicable transportation goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan to discourage non-residential traffic flow onto neighborhood streets and with the Community Plan and Los Angeles River Master Plan Landscaping Design Guidelines and Plant Palettes to increase accessibility to the Los Angeles River. The Project's driveways would exceed the 30-foot maximum driveway width under LADOT Manual of Policies and Procedures (MPP) Section 321. The widths of the driveways would enhance safety by accommodating a median island to restrict turns into and out of the driveway(in the case of the northern driveway that would be located in proximity to the clubhouse) or serve as an extension of broader Valleyheart Drive (in the case of the southern driveway that would be located in proximity to LAFD Station 78). While the Project would not be consistent with the MPP Section 321 requirement, the inconsistency would not result in increased circulation, pedestrian or vehicular conflicts and, as such, would be less than significant. The Project would not conflict with the Plan for a Healthy Los Angeles by providing for pedestrian and bicycle access to the Project Site. Because the Project would not conflict with programs, plans, ordinances or policies addressing the circulation system, including

transit, roadway, bicycle and pedestrian facilities, transportation impacts would be less than significant. However, the No Project/No Build Alternative would neither implement nor conflict with any such plan objectives and, as such would have no impact. Therefore, impacts under No Project/No Build Alternative would be less than under the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The No Project/No Build Alternative would close the Project Site, which would eliminate existing daily VMT since the absence of activity and use of the Project Site would not generate regular daily vehicle trips. As such, the No Project/No Build Alternative would have a less than significant impact with respect to increases in existing VMT conditions and consistency with CEQA Guidelines Section 15064.3, Subdivision (b). As evaluated in Section IV.M, *Transportation*, of this Draft EIR, the Project would generate an estimated total daily VMT of 3,932 miles. When subtracting from the existing conditions (daily VMT of 6,030 miles), the Project would result in an estimated net decrease of 2,098 daily VMT compared to existing conditions (consistent with LADOT's methodology which excludes the Project's VMT components related to community use). Therefore, as the Project would result in a net decrease in daily VMT compared to existing conditions, Project impacts regarding VMT would be consistent with the LADOT's TAG and, thus, consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts would be less than significant. However, because the No Project/No Build Alternative would close the Project Site and reduce VMT to a greater extent than the Project, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Geometric Design Hazards

The No Project/No Build Alternative would close the existing on-site uses and would not include any new development of the Project Site, including the relocation of any access driveways. The No Project/No Build Alternative Project would have no impact with respect to geometric design hazards. As evaluated in Section IV.M, *Transportation*, of this Draft EIR, there are two driveways proposed as part of the Project, one of which (north driveway) would be on Whitsett Avenue, an arterial facility, several hundred feet south of Valley Spring Lane. The other driveway (south driveway) would be an extension of Valleyheart Drive, which intersects with Whitsett Avenue just south of LAFD Fire Station 78. The driveways would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. In addition, pedestrians and bicycles would have separate entrances to the Project Site from the vehicular driveways, and the Project would not add vehicular traffic that would exceed the queuing capacity of nearby freeway off-ramps. Thus, Project impacts with respect to geometric design hazards would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to geometric design hazards, impacts would be less under the No Project/No Build Alternative than under the Project.

(iv) Emergency Access

(a) Construction

The No Project/No Build Alternative would not generate construction activity. As such, the No Project/No Build Alternative would have no impact with respect to emergency access. As evaluated in Section IV.M, *Transportation*, of this Draft EIR, the Project would include temporary construction activities and generate construction vehicle trips that could potentially affect emergency access to the Project Site and surroundings. The Project would involve the export of 250,000 cubic yards of excavated materials, which would generate 35,714 haul truck trips. Potential congestion affecting emergency access would be addressed through Project Design Feature TRAF-PDF-1, implementation of a Construction Management Plan (CMP). The CMP would provide designated haul routes, a staging plan, and programs to be reviewed by the LADOT, to ensure that access to neighborhood and collector streets in proximity to the Project Site remain unobstructed. The CMP also requires coordination with emergency service providers to ensure adequate emergency access. With implementation of the CMP, construction activities would not result in obstructed emergency access in the area. Therefore, emergency access impacts during Project construction would be less than significant. However, because the No Project/No Build Alternative would have no impact with respect to emergency access, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would close the Project Site and eliminate the Project Site's current recreational activities. Access in and around the Project Site would be maintained similar to existing conditions. As such, the No Project/No Build Alternative would have no impact with respect to emergency access. As discussed in Section IV.M, *Transportation*, of this Draft EIR, the Project Site is located in an established urban area served by a roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. As part of the Project, Project Design Feature TRAF-PDF-2 would include a driveway warning signal to prevent conflicts between the Project's vehicle traffic and fire emergency vehicles leaving from or arriving to LAFD Fire Station 78. On surrounding roadways, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project. Under the Project, driveways would be subject to LAFD review to confirm that adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, the Project would not impair implementation of, or physically interfere with, adopted emergency response or emergency evacuation plans. Project impacts with respect to emergency access would be less than significant. Because the No Project/No Build Alternative would not generate traffic and eliminate existing traffic generated at the Project Site and would

not modify emergency access operations associated with LAFD Fire Station 78, impacts regarding emergency access would be less under the No Project/No Build Alternative than under the Project.

(n) Tribal Cultural Resources

The No Project/No Build Alternative would not involve any ground disturbance or excavation activities that would potentially encounter previously undiscovered tribal cultural resources and, as such, would have no impact related to tribal cultural resources. As discussed in Section IV.N, *Tribal Cultural Resources*, of this Draft EIR, under the Project, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. As such, Project excavation activities have the potential to encounter previously undiscovered subsurface tribal cultural resources. The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC indicated no known Tribal cultural resources within the Project Site or surrounding area. However, in the event that buried tribal cultural resources are encountered during excavation or other construction activity, the City's standard condition of approval to address inadvertent discovery of tribal cultural resources would be enforced. With implementation of the standard condition of approval, Project construction would not cause a substantial adverse change in the significance of tribal cultural resources pursuant to Section 15064.5 of the CEQA Guidelines. With compliance, the Project would result in less than significant impacts to tribal cultural resources. Because the No Project/No Project Alternative would not involve any disturbance of the Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste

(i) Water Supply

(a) Construction

The No Project/No Build Alternative would not involve any construction activity and as such, would not generate construction-related water demand. Thus, no impacts regarding construction-related water supply or infrastructure impacts would occur. As evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR, the Project's construction activities would require approximately 1,000 to 2,000 gpd of water for dust control and other construction-related purposes. The Project's intermittent construction-related water demand would be met by LADWP's available water supplies. As such, adequate water supplies would be available from existing entitlements and resources for Project construction activities. LADWP has sufficient water supplies to serve the Project into the reasonably foreseeable future during normal, dry, and multiple-dry years. Any construction relative to the water delivery system for the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would

implement a Construction Traffic Management Plan under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. Therefore, the Project's impacts on water supply and infrastructure during construction would be less than significant. However, because the No Project/No Build Alternative would have no construction-related water demand, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. Potentially, limited amounts of water could be required for periodic maintenance activities. As such, the No Project/No Build Alternative would not generate a substantial water demand that would adversely affect water supplies or infrastructure serving the Project Site. Rather, this Alternative would eliminate the existing water demand associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to water supply and infrastructure. As evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR, the Project's on-site water demand would be approximately 39,872 gpd or 44.65 acre-feet per year (AFY). The Project would further implement Project Design Feature, WS-PDF-1 regarding the use of artificial turf and Project Design Feature WS-PDF-2 regarding the use of the stormwater capture and reuse system to further reduce the use of irrigation water. Water infrastructure and water supply are sufficient to meet Project demand without mitigation and, as such, the Project impact on the provision of water supply and infrastructure would be less than significant. Because the No Project/No Build Alternative would generate a limited water demand and would eliminate the water demand associated with operation of the current Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(ii) Wastewater

(a) Construction

The No Project/No Build Alternative would not involve any construction activity and as such, would not generate construction-related wastewater. Thus, no impacts regarding to construction-related wastewater or infrastructure impacts would occur. . As evaluated in Section IV.O.2, *Utilities and Service Systems - Wastewater*, of this Draft EIR, construction workers under the Project would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Construction of the Project would include all necessary on- and off-site sewer pipe improvements and connections. If existing sewer lines are found to be substandard or deteriorated, necessary improvements would be required to achieve adequate service under the City's Building and Safety Code and the Los Angeles Department of Public Works (LADPW) requirements. Construction relative to the wastewater system for the

Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. Overall, impacts to wastewater facilities during Project construction would be less than significant. Because the No Project/No Build Alternative would have no impact on wastewater capacity or facilities, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

Under the No Project/No Build Alternative, existing activities and operations on the Project Site would be discontinued. The Project Site would be fenced off and closed to both the Harvard-Westlake School and the public. Potentially, limited amounts of wastewater could be generated during periodic maintenance activities. As such, the No Project/No Build Alternative would not generate a substantial amount of wastewater or adversely affect wastewater infrastructure or treatment facilities serving the Project Site. Rather, this Alternative would eliminate the existing wastewater generation associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to wastewater treatment and facilities. As evaluated in Section IV.O.2, *Utilities and Service Systems - Wastewater*, of this Draft EIR, the Project is estimated to have a maximum, worse-case day wastewater generation of approximately 527,574 gpd, or approximately 0.527 million gallons per day (mgd), taking into account the possible need for a full flush of the 52-meter pool concurrent with peak wastewater generation from every other source on the Project Site (although a full flush is a rare occurrence and may occur only a few times a year). The Project would reduce potential impacts to the local sewer system during Project operation with the implementation of Mitigation Measure WW-MM-1, to discharge the swimming pool at a rate of no more than 166,000 gallons per day and Mitigation Measure WW-MM-2 to 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. With these mitigation measures, the Project's additional wastewater would be within the capacity limits of the conveyance and treatment facilities serving the Project Site, and impacts would be less than significant. Because the No Project/No Build Alternative would generate a limited amount of wastewater and eliminate the wastewater generation associated with operation of the current Project Site, impacts would be less under the No Project/No Build Alternative than under the Project.

(iii) Solid Waste

(a) Construction

The No Project/No Build Alternative would close the Project Site and would not include any new construction. Therefore, the No Project/No Build Alternative would have no

impact with respect to construction-related solid waste generation. As evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste*, of this Draft EIR, Project construction would generate an estimated 397,493 tons (pre-diversion) and 99,373 net tons (post-diversion) of construction and demolition (C&D) waste for landfill disposal. This would represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under the Project would be less than significant. However, because the No Project/No Build Alternative would have no impact related to C&D waste, impacts would be less under the No Project/No Build Alternative than under the Project.

(b) Operation

The No Project/No Build Alternative would close the Project Site and would not generate daily operational solid waste. Potentially, limited amounts of solid waste could be generated during periodic maintenance activities. This Alternative would eliminate the existing solid waste generation associated with operation of the current Project Site. As such, the No Project/No Build Alternative would have a less than significant impact related to solid waste. As evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste*, of this Draft EIR, assuming a diversion rate of 65 percent during the Project's operational phase, the Project would generate 63 tons (post-diversion) of solid waste per year. The Project's solid waste disposal would represent approximately 0.0006 percent of the County's remaining landfill capacity in 2025. The Project's additional solid waste generation would be accommodated by landfills with adequate capacity to serve the Project and, as such, impacts would be less than significant. Because the No Project/No Build Alternative would generate a limited amount of solid waste and would eliminate the solid waste generation associated with operation of the current Project Site, impacts on landfill capacity would be less under the No Project/No Build Alternative than under the Project.

(3) Relationship of the Alternative to Project Objectives

As described above, the No Project/No Build Alternative assumes that no new development would occur on the Project Site. As the No Project/No Build Alternative would not include a development program, it would not achieve any of the Project's Objectives.

b) Alternative 2: At Grade Parking Alternative

(1) Description of the Alternative

Alternative 2 would eliminate the 503-space subterranean garage and the one-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 one-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. That is, the Project's southern driveway via Valleyheart Drive from Whitsett Avenue would continue to lead to a drop-off/pick-up roundabout area at the southeast corner of the Project Site and the Project's 29-space, short-term surface parking lot would be retained under Alternative 2. Also, the at grade parking below Field A would be accessed via a driveway along Whitsett Avenue at a similar location as the driveway proposed for 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.

Under the Project, the rough grading cut volumes would be approximately 251,836 cubic yards (unadjusted), and the fill volume would be approximately 1,836 cubic yards (unadjusted), for a net cut/fill volume of approximately 250,000 cubic yards (unadjusted). A total of 17,857 trucks or 35,714 soil haul truck trips (to and from the Project Site) would be required under the Project. Under Alternative 2, excavation to a depth of four feet would be required to support the Field A structure, which would include 33,123 cubic yards of soil export (2,366 trucks or 4,732 truck trips[4]), as compared to 148,000 cubic yards of soil export (10,571 trucks or 21,142 truck trips) for the subterranean garage under the Project. Alternative 2 also would not include the Project's one-million-gallon underground capture and reuse stormwater system, which requires 11,900 cubic yards of soil export (850 trucks or 1,700 truck trips). Thus, 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.

4 223,580 sf x 4-feet = 894,320 sf = 33,123 cy = 2,366 trucks or 4,732 truck trips (using 14 cy trucks).

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. This is primarily due to the elimination of excavation for the Project's subterranean parking garage and stormwater capture and reuse system.

Alternative 2 would require the same entitlements requested for the Project, including a Vesting Conditional Use Permit to allow the operation of a private-school athletic and recreational campus in the A1 zone; allowance of light poles over 30 feet; and allowance of privacy walls and fences up to 10 and 11 feet. The exception is that, under Alternative 2, the request for light poles of 70 feet for Field A under the Project would be adjusted to 85 feet to allow for lighting of the elevated field.

(2) Environmental Impacts

(a) Aesthetics/Visual Resources

(i) Light and Glare

(a) Construction

Under the Project, as discussed in Section IV.A, *Aesthetics*, of this Draft EIR, and Alternative 2, construction would primarily take place during daylight hours in accordance with LAMC Section 41.40 requirements. Any construction lighting would be for security purposes only. During construction, all existing light sources, such as evening tennis lighting, would be discontinued and, as such, the Project Site would not be a meaningful source of light. Because of minimal lighting during the construction phase, impacts related to light and glare would be less than significant and similar under Alternative 2 and the Project.

(b) Operation

The Project, as discussed in Section IV.A, *Aesthetics*, of this Draft EIR, and Alternative 2 would implement a lighting program for the athletic fields, pool, and tennis courts, as well as security lighting for pathways and courtyards, and building lights for the gymnasium. Under both the Project and Alternative 2, the golf ball-shaped light standards would be similarly relocated and fitted with optic control to reduce glare and the 128 existing, high-glare (500-watt flood lights) for the existing tennis courts would be removed. Alternative 2 and the Project's lighting program would not exceed LAMC light and glare standards, including RIO standards of maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the Project Site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site. As such, Alternative 2 and the Project's impacts related to light and glare would be less than significant. While Alternative 2 would increase the height of light poles for Field A, it is anticipated that off-site light levels would be similar to the Project with compliance to the applicable LAMC and RIO lighting standards. As such, impacts would be similar under Alternative 2 and the Project.

(b) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

During the construction phase, the Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would comply with SCAQMD emissions control regulations and CARB requirements to minimize short-term emissions from on- and off-road diesel emissions. With implementation of Mitigation Measure AQ-MM-1, impacts related to the timely attainment of air quality standards or interim emission reductions specified in the AQMP would be reduced to below threshold levels. In addition, Alternative 2 and the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based. Since localized construction emissions would be less than significant without mitigation, and its regional construction emissions would be less than significant with implementation of the required mitigation measure, neither Alternative 2 nor the Project would obstruct implementation of the 2016 AQMP. Overall, potentially significant impacts related to the potential to conflict with or obstruct the implementation of the applicable air quality plan under Alternative 2 and the Project would be reduced to less than significant with implementation of Mitigation Measure AQ-MM-1. Because both Alternative 2 and the Project would similarly comply with the AQMP, impacts would be similar.

(b) Operation

The Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would provide the same recreational uses and scale of development and would similarly increase occupancy of the Project Site and operational emissions. Both Alternative 2 and the Project would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during operation. As such, impacts with respect to AQMP consistency under Alternative 2 and the Project would be less than significant and similar.

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

Construction activities under the Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment that would potentially increase the frequency or severity of an existing violation. Construction of Alternative 2 or the Project could cause or contribute to new violations for exceedance of regional NO_X emissions. Construction emissions under the Project or Alternative 2 would not exceed the SCAQMD regional significance thresholds for VOCs, CO, SO2, PM10, and PM2.5. Implementation of Mitigation Measure AQ-MM-1 by the Project or Alternative

2, which would require machinery and vehicle emissions controls, would reduce short-term and temporary NO_X emissions, including emissions from haul trucks during the grading activities to below the regional emission significance threshold. With this mitigation measure, Alternative 2 and the Project's impacts would be less than significant. However, while maximum daily emissions would be similar, because Alternative 2 would substantially reduce the overall extent of excavation activities and the use of heavy-duty excavation equipment, haul truck trips, and overall construction duration from 30 months to 26 months compared to the Project, Alternative 2's impacts would be less than under the Project.

(b) Operation

The Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would provide the same recreational uses and scale of development and would, similarly, increase occupancy of the Project Site and operational emissions. Alternative 2 and the Project's mobile, stationary, and area source criteria pollutants emissions would not exceed the SCAQMD thresholds of significance. Therefore, regional operational emission impacts under Alternative 2 and the Project would be less than significant and similar.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Construction activities under the Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would generate localized emissions. Both Alternative 2 and the Project's maximum daily construction emissions would not exceed the SCAQMD localized significance thresholds. As such, localized construction emissions impacts to sensitive receptors under both Alternative 2 and the Project would be less than significant. However, while maximum daily emissions would be similar, because Alternative 2 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 26 months compared to the Project, Alternative 2's impacts would be less than under the Project.

(b) Operation

The Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would provide the same recreational uses and scale of development and would, similarly, increase occupancy of the Project Site and operational emissions. During operation, Alternative 2 and the Project's daily localized emissions related to energy use and use of coatings, consumer products, and landscaping products would be substantially less than the SCAQMD's significance thresholds. As such, impacts under Alternative 2 and the Project would be less than significant and similar.

(iv) Carbon Monoxide Hotspots

The most heavily impacted intersection in the area with the potential to result in carbon monoxide hotspots is Coldwater Canyon Avenue at Ventura Boulevard. Analysis of this intersection provided in Section IV.B, *Air Quality*, of this Draft EIR demonstrated that, during operation, Project vehicle trips would not contribute to the formation of CO hotspots that would exceed threshold standards at this location. Impacts related to CO hotspots would be less than significant. Alternative 2 would have less overall construction trips compared to the Project due Alternative 2's reduction in excavation and shorter duration of the construction phase and operational trips would be similar to the Project. Because construction traffic would be less than under Project operation, impacts during construction of Alternative 2 would also be less than significant. Since Alternative 2 and the Project would not substantially contribute to the formation of CO hotspots, impacts related to CO hotspots would be less than significant under both the Project and Alternative 2. Because Alternative 2 would result in fewer overall trips due to less construction trips, impacts under Alternative 2 would be less than the Project.

(v) Toxic Air Contaminants

(a) Construction

Under the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2, TAC emissions associated with DPM emissions from heavy construction equipment and vehicles would be generated during the construction phase. TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (26 months under Alternative 2 and 30 months under the Project), construction of Alternative 2 and the Project would not result in a long-term exposure. Alternative 2 would reduce the Project's TACs with its substantial reduction in excavation, reduction in the use of heavy-duty excavation equipment, and the reduction in haul trips for export of excavated materials. Under both the Project and Alternative 2, hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, would be similarly managed and disposed of in accordance with applicable laws and regulations. The nearest residential sensitive receptors are located adjacent to the Project Site to the east, north, and west. Based on the short-term duration of Alternative 2 and Project construction and compliance with regulations that would minimize emissions, such receptors would not be exposed to substantial TAC concentrations. Impacts related to TACs would be less than significant under both the Project and Alternative 2. However, while maximum daily emissions would be similar, because Alternative 2 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 26 months compared to the Project, Alternative 2's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 2 would not include any regular heavy truck use during operation and would generate only limited amounts of diesel emissions from mobile sources that would not exceed the SCAQMD's project screening criteria of 100 trucks per day and would have a less than significant impact relative to TAC emissions. Alternative 2 and the Project are expected to generate minimal emissions from sources such as consumer products and architectural coatings. Also, Alternative 2 or Project impacts related to the inhalation of vapors and particulates in the air space above an artificial turf field, ingestion of artificial turf products, and dermal contact with artificial turf products would be less than significant because evidence does not support a conclusion of a significant increase in health risks. Thus, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled under both Alternative 2 and the Project, and would not exceed the SCAQMD significance threshold. Therefore, impacts under Alternative 2 and the Project would be less than significant and similar.

(c) Biological Resources

(i) Candidate, Sensitive, or Special Status Species

Development of the Project as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 2 would result in the direct removal and replacement of a number of ornamental, non-native and, in some cases, invasive tree species and other common ornamental plant species. No candidate, sensitive or special status plant species would be directly impacted by Project or Alternative 2 construction. Indirect impacts to special status plant species during construction and operation of the Project and Alternative 2 would be limited, if any, such that indirect impacts would be less than significant.

Common and non-indigenous wildlife species to be temporarily displaced during construction of the Project or Alternative 2, with the exception of a western yellow bat species (species of special concern), do not meet the significance threshold of candidate, sensitive, or special status wildlife species. Impacts on the western yellow bat during construction of the Project or Alternative 2 would be potentially significant and, as such, Mitigation Measure BIO-MM-1 would be implemented to provide for protection of the western yellow bat's roosting habitat. With this mitigation measure, the Project's or Alternative 2's impact on candidate, sensitive, or special status wildlife species during construction would be reduced to a level that is less than significant. Operation of the Project or Alternative 2 would result in no direct impacts to candidate, sensitive or special status wildlife species. During operation of the Project or Alternative 2, indirect impacts to special status bat species associated with a change in the on-site ambient lighting would be low and minimal operational lighting impacts would not diminish the chances for long-

term survival of a special status bat species. Further, a change in the on-site operational noise levels and associated human activities would be low and would not diminish the chances for long-term survival or significantly impact special status bat species. Therefore, under both the Project and Alternative 2, operational indirect impacts to candidate, sensitive or special status wildlife species would be less than significant.

Overall, with mitigation, impacts on candidate, sensitive, or special status species under both the Project and Alternative 2 would be reduced to a level that is less than significant and impacts would be similar.

(ii) Riparian Habitat and Other Sensitive Communities

As evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, the off-site portion of the Biological Study Area along the Zev Greenway supports 0.88 acre of California brittlebush scrub, a sensitive natural community. The river connection trail, river fence, and river overlook under both the Project and Alternative 2 would impact 0.14 acres of recently restored California brittlebush scrub, which comprises 16 percent of the off-site sensitive natural community. Although impacts would be limited, direct impacts to this sensitive natural community would be potentially significant and, as such, Mitigation Measure BIO-MM-2 would be implemented to replace removed brittlebush scrub on a 1:1 ratio. Therefore, with this mitigation measure, the Project and Alternative 2's impact on sensitive communities would be reduced to a level that is less than significant and impacts would be similar.

(iii) Movement of Wildlife or Nursery Sites

Under the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 2, since the Biological Study Area does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s), no impacts would occur to regional movement. Although implementation of Alternative 2 and the Project would result in temporary disturbances to local wildlife movement within the Biological Study Area with the removal of landscape trees that may be used by birds and bats, those species are adapted to urban areas and would be expected to persist on-site following construction because a significant number of native replacement trees (an increase of 153 trees under both Alternative 2 and the Project as compared to existing conditions) would be planted on-site, and additional native shrub habitat would be planted that would provide habitat value not currently existing on-site by expanding the habitat, creating a greater native seed source, and providing a larger buffer from non-native ornamental landscaping in the surrounding developed areas. Therefore, Alternative 2 and Project impacts on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors would be less than significant. Nonetheless, Alternative 2 or Project construction activities could potentially disturb songbird and raptor nests and significantly impact these biological resources. Project Design Feature BIO-PDF-1 would be implemented to demonstrate compliance with regulatory requirements for nesting bird protection, and Mitigation Measure BIO-MM-1 would be implemented to

reduce any direct impacts to nesting birds and roosting bat species. Therefore, with these mitigation measures, impacts under Alternative 2 or the Project on nursery sites would be reduced to a level that is less than significant and impacts would be similar.

(iv) Conflict with Policies or Ordinances Protecting Biological Resources

The Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 2 would provide publicly accessible recreational and open space uses in the Biological Study Area while improving public access to connect these uses to the River-adjacent Zev Greenway. Both Alternative 2 and the Project would provide substantial open space and facilitate public access to the Los Angeles River, which would be consistent with the City's Open Space Element and the RIO District Ordinance. Alternative 2 and the Project's plant materials would consist entirely of native plants that have low to medium water demand, and landscape design includes the maintenance and planting of healthy trees that are consistent with the RIO District Ordinance and Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The Project would include an underground stormwater capture and reuse system that would treat on-site stormwater as well as stormwater from a 39-acre residential area to the north, which would not be constructed under Alternative 2. While Alternative 2 would comply with applicable LAMC LID requirements, it would only capture and treat stormwater originating from within the Project Site. Stormwater treatment under both Alternative 2 and the Project would support improving the health of the City's watersheds, which is a goal of the RIO District Ordinance. Neither the Project nor Alternative 2 would conflict with City policies and ordinances protecting biological resources and, therefore, impacts would be less than significant. However, because Alternative 2 would provide stormwater treatment to a lesser extent than the Project, it would achieve policies related to improving the health of the watershed to the lesser extent than the Project, and as such, impacts would be greater under Alternative 2 than under the Project.

(v) City-Protected and Non-Protected Significant Trees and Shrubs

The Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 2 would require the replacement of 209 non-protected significant trees and 31 City-protected public street trees. Alternative 2 and the Project would, therefore, result in a potentially significant impact related to City-protected and non-protected trees. Mitigation Measure BIO-MM-3 would be implemented under both Alternative 2 and the Project to require replacement of all non-protected significant trees at a minimum 1:1 ratio and street trees at a ratio of typically 2:1. Alternative 2 and the Project would result in a net increase of 153 trees as compared to the existing 421 inventoried trees within the Biological Study Area. Therefore, with the required mitigation measure, Alternative 2 and the Project's impact on City-protected trees and non-protected significant trees would be reduced to a level that is less than significant and impacts would be similar.

(d) Cultural Resources

(i) Historical Resources

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 2 would retain the recreational character of the Project Site, and would maintain 5.4 acres of open space. Both Alternative 2 and the Project would implement Project Design Feature CULT-PDF-1 to retain and provide 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. This includes retaining the clubhouse in its historic location, and maintaining the character-defining features of the Project Site, including the putting green, low brick retaining wall, clubhouse, and relocating the golf ball-shaped light standards, which have been historically visible from the public right-of-way. Further, Project Design Features CUL-PDF-2 and CUL-PDF-3 would be implemented by Alternative 2 and the Project which require that the extant features of the Project Site are documented in a HABS survey and an interpretive exhibit displaying the history of the Project Site to be housed on the Project Site, respectively. With the Project Design Features in place, Alternative 2 and Project impacts on historic resources would be less than significant. However, compared to the Project, the elevated Field A under Alternative 2 would represent a greater contrasting feature in the context of existing views (all at grade features) with the Project Site's character defining features from the public right-of-way, with bleachers rising to 30 feet above ground elevation. Thus, because Alternative 2 would result in a greater contrast to the setting of Project Site's character defining features, impacts to historical resources would be greater under Alternative 2 than under the Project.

(ii) Archaeological Resources

Under the Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 2 would eliminate the Project's subterranean parking garage and underground stormwater capture and reuse system. Construction under Alternative 2 would include excavation to four feet for the Field A structure and similar excavation as the Project for the gymnasium building and pool. Excavation activities under both Alternative 2 and the Project would have the potential to encounter previously undiscovered subsurface archaeological resources. Should archaeological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, neither Alternative 2 nor the Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because Alternative 2 would substantially reduce the extent of excavation activities due to the elimination of the Project's subterranean parking

garage and underground stormwater capture and reuse system, impacts to archaeological resources would be less under Alternative 2 than under the Project.

(iii) Human Remains

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 2 would require grading, excavation, and other construction activities that have a potential to disturb previously undiscovered human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of the human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, impacts under Alternative 2 and the Project related to human remains would be less than significant. However, because Alternative 2 would substantially reduce the extent of excavation activities compared to the Project due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, impacts related to human remains would be less under Alternative 2 than under the Project.

(e) Energy

(i) Construction

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 2 are not expected to consume natural gas during construction, but would use electricity, as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. One aspect of the construction phase, the export of excavated materials, is expected to require 35,714 truck trips to haul 250,00 cubic yards of materials under the Project, and 17,600 truck trips to haul 123,223 cubic yards of materials under Alternative 2. Because Alternative 2 would shorten the construction duration (from 30 months to 26 months) and hauling activity due to elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, it would reduce the Project's overall demand for electricity and fuel. Construction would utilize energy only for necessary construction activities, and construction of Alternative 2 and the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Because Alternative 2 and the Project would not result in an increase in demand for electricity and fuels that would exceed available supply or distribution infrastructure capabilities, they would not require the broad construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, energy impacts under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would reduce the scale and duration of construction activity compared to the Project, impacts would be less under Alternative 2 than under the Project.

(ii) Operation

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 2 would include development of new recreational features and activity at the Project Site, which would generate new energy demand with the same range of uses. Alternative 2 and the Project's annual average operational electricity usage would be similar at approximately 2,617,043 kWh. Natural gas demand would be similar at approximately 1,663,510 cubic feet. Transportation would be similar and result in an annual demand of 131,955 gallons of gasoline and 14,756 gallons of diesel. Demand would be within the handling capacity of suppliers. Operation of both Alternative 2 and the Project would comply with the CALGreen Code's energy saving measures. In addition, sustainability measures, such as a solar photo-voltaic array system and LED lighting, would be implemented under both Alternative 2 and the Project to reduce energy demand. Operation of either Alternative 2 or the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, energy impacts under Alternative 2 and the Project would be less than significant and similar.

(f) Geology and Soils

(i) Geologic Hazards

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 2 would implement engineering controls and comply with regulations for planned excavation and construction activities that would minimize any potential geologic hazards at the Project Site, including fault rupture, seismic shaking, liquefaction, or other geologic conditions. Therefore, development of Alternative 2 or the Project would not result in substantial damage to structures or infrastructure or expose people to substantial risk of injury caused in whole or in part by the Project's exacerbation of existing environmental conditions. Impacts related to exacerbation of existing geologic conditions under both Alternative 2 and the Project would be less than significant and similar.

(ii) Soil Erosion or Loss of Topsoil

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 2 would require grading and excavation of soils, which would potentially increase erosion or loss of topsoil. By eliminating the Project's subterranean parking garage and one-million-gallon stormwater treatment system, Alternative 2 would reduce the Project's soil export of 250,000 cubic yards to 123,223 cubic yards, which is a reduction of 126,777 cubic yards. Construction activities under both Alternative 2 and the Project would be carried out pursuant to the CBC and the requirements of the NPDES General Construction Permit. Both Alternative 2 and the Project would be required to implement a SWPPP with incorporated BMPs to control soil erosion during the Project's construction period. With compliance with applicable LAMC and regulatory requirements, impacts associated with substantial erosion or loss of topsoil would be less than significant under both Alternative 2 and the Project. However, because

Alternative 2 would reduce both the scale of excavation and the duration of construction activity compared to the Project, impacts would be less under Alternative 2 than under the Project.

(iii) Unstable Geologic Units

Neither the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, or Alternative 2 would be located on a geologic unit or soil that is unstable, or that would become unstable as a result of either Alternative 2 or the Project, or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Under both Alternative 2 and the Project, all required excavations would be shored as required under the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. Further, as required by the Building Code, both Alternative 2 and the Project would adhere to a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts under Alternative 2 and the Project with respect to unstable geologic units would be less than significant and similar.

(iv) Expansive Soils

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 2 would comply with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization in accordance with the 2019 CBC and proper engineering erosion control and proper engineering drainage design). Both would address expansive soils through City Building Code regulations pertinent to foundation stability to ensure that expansive soils or other unstable soils are removed, as necessary. Because both Alternative 2 and the Project would remove expansive soils, impacts with respect to expansive soils under both Alternative 2 and the Project would be less than significant and similar.

(v) Paleontological Resources

Under the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 2 would eliminate the Project's subterranean parking garage and underground stormwater capture and reuse system. Construction under Alternative 2 would include excavation to four feet for the Field A structure and similar excavation as the Project for the gymnasium building and pool. Excavation activities under both Alternative 2 and the Project would have the potential to encounter previously undiscovered subsurface paleontological resources. Should paleontological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of paleontological resources would be enforced. With implementation of the standard condition of approval, impacts to paleontological resources would be less than significant under Alternative 2 and the Project. However,

because Alternative 2 would substantially reduce the extent of excavation activities due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, impacts to paleontological resources would be less under Alternative 2 than under the Project.

(g) Greenhouse Gas Emissions

(i) Construction

Under the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 2, hauling of exported excavated materials, concrete pours, deliveries, worker trips, and on-site construction equipment would result in GHG emissions. The Project would result in a net cut/fill volume of approximately 250,000 cubic yards (unadjusted), which would require a total of 17,857 trucks or 35,714 soil haul truck trips (to and from the Project Site). Alternative 2 would reduce the Project's soil export of 250,000 cubic yards to 123,223 cubic yards , requiring 8,802 trucks or 17,604 truck trips, which is a reduction of 126,777 cubic yards and 9,055 trucks or 18,110 truck trips. Alterative 2 would also reduce the duration of the Project's construction activities from 30 to 26 months. Construction activities would comply with CARB's improved engine efficiency regulations and reduced idling times, as well as SCAQMD air quality control measures that reduce GHG emissions. Compliance with SCAQMD's CEQA Air Quality Handbook would ensure that GHG emissions would be consistent with applicable strategies outlined to reduce construction emissions. However, because Alternative 2 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 26 months compared to the Project, Alternative 2 would generate less GHG emissions during construction compared to the Project and for this reason impacts would be less under Alternative 2 than under the Project.

(ii) Operation

Operation of the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 2 would generate increased GHG emissions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, Alternative 2 and the Project would not conflict with the regulations and policies and would comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Alternative 2 and the Project would also have a less-than-significant impact with respect to the urban heat island effect. Therefore, Alternative 2 and the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and project-specific impacts with regard to GHG emissions would be less than significant. The level of GHG emissions during operation would be less than significant under the Project and, because Alternative 2 would result

in the same level of operational activity as the Project, impacts under the Project and Alternative 2 would be similar and less than significant.

(h) Hazards and Hazardous Materials

(i) Transport, Use, or Disposal of Hazardous Materials

(a) Construction

Construction of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 2 would involve the demolition and removal of numerous existing on-site improvements, including the tennis shack, tennis courts, court lighting, driving range features, golf course features, and paved areas. During the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions in accordance with BMPs contained in the required SWPPP. Due to the age of the clubhouse and tennis shack, which were constructed in 1955-1956, prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements under either Alternative 2 or the Project would ensure that impacts associated with ACM, LBP, and PCB would be less than significant. Impacts related to the routine transport, use, or disposal of hazardous materials under Alternative 2 and the Project would be less than significant and similar.

(b) Operation

Operation of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 2 would require the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, pesticides (for the putting green) and other household-type materials. The use of these materials would be in small quantities and in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements would reduce the potential to release contaminants. Alternative 2 and the Project would replace the golf course and other existing uses with new athletic and recreational facilities, including outdoor athletic fields utilizing artificial grass as a sustainable alternative to turf grass. The artificial turf would reduce the need to use pesticides as typically required to maintain grass playing fields. Further, no evidence or studies have demonstrated that health-related or hazardous materials impacts to the public or the environment would occur with use of artificial turf, including but not limited to inhalation risks. Therefore, impacts with respect the transport, use, and disposal of

hazardous material under either Alternative 2 or the Project would be less than significant and similar.

(ii) Accidental Release of Hazardous Materials

The Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 2 would require rehabilitation of the clubhouse and demolition of the tennis shack. Due to the age of the clubhouse and tennis shack to be removed, which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant under both Alternative 2 and the Project.

Alternative 2 and the Project would both require grading and excavation of the Project Site. The Project would result in a rough cut/fill volume of 251,836 cubic yards and export of 250,000 cubic yards of material; whereas Alternative 2 would result in the export of 123,223 cubic yards of material. Such grading activities could result in the exposure of construction workers to hazardous conditions associated with contaminated soils or soil vapor due to long-term use of pesticides to maintain the golf course and a previously removed UST. As such, either Alternative 2 or the Project could create a significant hazard to the public, and impacts would be potentially significant. Implementation of Mitigation Measures HAZ-MM-1 (SMP), and HAZ-MM-2 (HASP) would reduce potentially significant impacts to the public or the environment from the release of hazardous materials released during upset and/or accident conditions to a less than significant level under both Alternative 2 and the Project. However, because Alternative 2 would substantially reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for accidental release of hazardous materials. As such, impacts would be less under Alternative 2 than under the Project.

(iii) Use of Hazardous Materials within One-Quarter Mile of a School

(a) Construction

The Project Site, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 2 are not located within 0.25 mile of a school. The Project Site is located within 1.6 miles of the LAUSD Millikan Middle School, 0.39 mile from Harvard-Westlake School, and 0.58 mile from Campbell Hall School. Construction of either Alternative 2 or the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With incorporation of

Mitigation Measure AQ-MM-1, neither Alternative 2 nor the Project would expose any schools to substantial TAC concentrations and, with the incorporation of Mitigation Measure HAZ-MM-1, requirements for the handling, management and disposal of any contaminated soils or soil vapors would be established to prevent unacceptable exposure to contaminated soils or vapors within one-quarter mile of a school. Because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials near any school under both Alternative 2 and the Project would be less than significant and similar.

(b) Operation

No schools are located within 0.25 mile of the Project Site. Operation of Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 2 would use small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, and other household-type materials, which would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Both Alternative 2 and the Project would comply with applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials, and users are expected to adhere to manufacturer's instructions related to handling hazardous materials. With compliance to applicable regulatory requirements and because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials within one-quarter mile of a school under both Alternative 2 and the Project would be less than significant and similar.

(i) Hydrology and Water Quality

(i) Water Quality Standards and Groundwater Quality

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 2, such as earth moving, maintenance and operation of construction equipment, potential dewatering, and handling, storage, and disposal of materials, as well as erosion, could contribute to pollutant loading in stormwater runoff from the construction site. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events, and on-site watering activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 2 and the Project would comply with regulatory requirements, BMPs provided under the required SWPPP, and City Building Code grading procedures to ensure that pollutant loading would not exceed water quality standards. In addition, if contaminated soils are encountered, Mitigation Measure HAZ-MM-1 would be implemented by Alternative 2 or the Project, which would require the preparation of an SMP. Per the SMP, any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable screening levels would

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 construction workers, the environment, or the public to hazardous materials from contaminated soils. With implementation of Mitigation Measure HAZ-MM-1, potentially significant surface and groundwater quality impacts during construction from contaminated soils under both Alternative 2 and the Project would be reduced to a less-than-significant level. Therefore, impacts with respect to construction phase water quality standards under both the Project and Alternative 2 would be less than significant with the required mitigation measure. However, because Alternative 2 would substantially reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for pollutants to enter into surface water sources or groundwater. As such, impacts would be less under Alternative 2 than under the Project.

(b) Operation

Alternative 2 would comply with applicable LID and LAMC regulations to capture and treat stormwater originating from the Project Site. By comparison, the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, would install a one-million-gallon underground stormwater capture, treatment, and reuse system, which would collect stormwater from the Project Site and a 39-acre off-site area located to the north of the Project Site. This system would improve the quality of runoff, which currently flows directly into the Los Angeles River from the off-site area and from the Project Site. Impacts under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would not collect and treat stormwater beyond the Project Site, impacts would be greater under Alternative 2 than under the Project.

(ii) Changes in Groundwater Supplies or Recharge

(a) Construction

During construction of the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 2, temporary dewatering during excavation may be required if groundwater is encountered. If required, pumps and filtration would be utilized in compliance with all applicable NPDES requirements for construction dewatering discharges. Any temporary construction dewatering would be minor and would not significantly contribute to depletion of groundwater supplies or interfere with recharge. As such, groundwater impacts would be less than significant under both Alternative 2 and the Project. However, because Alternative 2 would not excavate as extensively as the Project, it would be less likely to require dewatering. Thus, impacts to groundwater water supply or recharge would be less under Alternative 2 than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 2, the amount of impervious area on the Project Site would increase from the existing 30 percent to 59 percent upon buildout. Alternative 2 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site, before releasing the water into the City's storm drain system. LAMC Section 12.84 (LID regulations) requires that all new development, which would include Alternative 2, retain 100 percent of the stormwater design volume (SWQDv) on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all SWQDv discharged from the site. By comparison, the Project would capture, treat, and store up to one-million-gallons of stormwater, at a time from the developed portions of the Project Site and the 39-acre off-site drainage area, through the stormwater capture and reuse system. Under both the Project and Alternative 2, any captured and treated stormwater would be used for irrigation or water features on the Project Site (refer to Project Design Feature WS-PDF-2), although less stormwater runoff would be available under Alternative 2 since it would not treat off-site stormwater. Impacts on the groundwater supply under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would not include the Project's one-million-gallon stormwater capture and reuse system that would in part reuse water on the Project Site for landscaping, impacts would be greater under Alternative 2 than under the Project.

(iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 2 could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, both Alternative 2 and the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant under both Alternative 2 and the Project. While Alternative 2 would require substantially less excavation, on- and off-site drainage patterns during construction would be similar under Alternative 2 and the Project and as such, impacts would be similar.

(b) Operation

Under the Project, the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, during the 50-year frequency design storm event peak flow rate, the peak flow rate of stormwater runoff from the Project Site would incrementally change from 60.93 cfs to 60.94 cfs (a 0.01 cfs or a 0.01 percent increase). This incremental change would not substantially alter the existing drainage pattern of the Project Site or surrounding area. The Project's stormwater capture and reuse system would serve to prevent on-site flooding and, at the same time, would ensure runoff discharged from the Project Site would not exceed the capacity of the municipal stormwater infrastructure during a larger storm event by capturing, storing and reusing stormwater on-site. Furthermore, through the stormwater capture and reuse system. the Project would address the localized flooding issue at the intersection of Valley Spring Lane and Whitsett Avenue, which regularly occurs during a rainfall event, as well as the stagnant water condition in the same area that frequently occurs even on dry days with the addition of a new curb inlet at the southwestern corner of Whitsett Avenue and Valley Spring Lane that would collect the stagnant water and convey it to the Project's capture and reuse system. By capturing, filtering, and reusing such stormwater, not only would at least one-third of the Project's annual landscape irrigation be satisfied, but vehicular and pedestrian safety would be improved by eliminating the localized flooding**.**

Alternative 2 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site, before releasing the water into the City's storm drain system. Through compliance with regulatory requirements, Alternative 2 would be required to ensure that no significant change or increase in off-site drainage volumes or patterns occur compared to existing conditions. Thus, with the implementation of stormwater collection and treatment systems under both Alternative 2 or the Project, neither would alter the Project Site's drainage patterns in a manner that would result in substantial erosion or exceedance of off-site storm drainage capacity, or impede flood waters. Therefore, impacts related to drainage patterns under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would not address localized flooding issues as under the Project, impacts under Alternative 2 would be greater than under the Project.

(j) Land Use and Planning

Under the Project, as evaluated in Section IV.J, *Land Use and Planning*, and the land use tables in Appendix J of this Draft EIR, and Alternative 2, the existing land use and zoning designation would not change. Neither Alternative 2 nor the Project would conflict with the policies of SCAG's 2020-2045 RTP/SCS, the General Plan Framework Element, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the LARRMP, or the LAMC, which includes the RIO District Ordinance (Section 13.17 of the LAMC) and which were adopted for the purpose of avoiding or mitigating an environmental effect. The development of either Alternative 2 or the Project would carry out certain objectives of applicable plans, such as reducing VMT consistent with the 2020-2045 RTP/SCS, and

creation of publicly accessible open space and improved access to the Los Angeles River under the Community Plan, the LARRMP, and the RIO District Ordinance. Because Alternative 2 and the Project would entail the same uses and would not conflict with applicable land use plans and policies, land use impacts under both Alternative 2 and the Project would be less than significant and similar.

(k) Noise and Vibration

(i) Construction

Under the Project, as evaluated in Section IV.K, *Noise*, of this Draft EIR, and Alternative 2, the temporary noise levels resulting primarily from heavy-duty machinery during construction would exceed the significance threshold at off-site noise receptors, including residential uses along Bellaire Avenue (receptor location R1, west of the Project Site), along Valley Spring Lane (receptor locations R2, R3 and R4, north of the Project Site), along Whitsett Avenue (receptor locations R5 and R6, east of the Project Site), and along Sunswept Drive (receptor location R7, south of the Project Site), prior to implementation of mitigation measures. In addition, construction noise impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp would be similar and significant at receptor R8 under both the Project and Alternative 2. Alternative 2 and the Project would implement Mitigation Measures MM-NOI-1, MM-NOI-2 and MM-NOI-3, as applicable, to reduce noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, Alternative 2 and the Project's construction noise impacts would continue to exceed threshold levels at receptor locations R1, R2, R3 and R8. Therefore, both Alternative 2 and the Project would result in the generation of a temporary increase in ambient noise levels that would be significant and unavoidable. For construction activities within the Project Site, groundborne vibration impacts would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be than significant under Alternative 2 or the Project. However, vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp with respect to human annoyance would be similar and significant and unavoidable at receptor location R8 under both the Project and Alternative 2.

Alternative 2 would substantially reduce the Project's excavation volumes and the use of heavy excavation equipment, as well as the overall number of haul trucks entering and leaving the Project Site. Although Alternative 2 would reduce the duration of construction activity, it would not reduce maximum daily noise levels during peak construction activity. However, because Alternative 2 would reduce construction duration primarily due to less excavation and soil hauling, Project-level noise and vibration impacts would be less at receptor locations R1, R2 and R3 under Alternative 2 than under the Project. As stated above, noise and vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 3.

In addition, the Project's cumulative significant and unavoidable on-site construction equipment noise and off-site construction traffic noise would remain significant and unavoidable under Alternative 2, but would occur at a lesser extent under Alternative 2 than under the Project. Also, cumulative construction noise and vibration (human annoyance only) impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 2.

(ii) Operation

The Project, as evaluated in Section IV.K, *Noise*, of this Draft EIR, and Alternative 2 would generate noise from fixed mechanical equipment, athletic activities, special events, and parking facilities. Noise would also be generated form people talking along the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp. Off-site noise would occur in the form of traffic noise. Alternative 2 and the Project would implement Project Design Features NOI-PDF-1 and NOI-PDF-2. Project Design Feature NOI-PDF-1 would include sections of solid walls and an overhead canopy above the swimming pool that would reduce noise associated with the athletic activities to the adjacent residences. Per Project Design Feature NOI-PDF-2, the amplified sound system for special events (e.g., movies or educational speakers) at Field A would be designed to reduce off-site noise at the nearest off-site sensitive uses to the north and east of Field A. As with the Project, composite noise levels associated with all noise sources under Alternative 2 would be below the 5-dBA CNEL significance threshold, and within acceptable standards established by the City. As with the Project, operational groundborne vibration impacts under Alternative 2 would not exceed threshold levels or result in excessive human annoyance or structure damage and, therefore, impacts would be less than significant. While the elevated height of Field A may serve to slightly decrease noise levels along Whitsett Avenue and residential receptors to the west at the street level, any such change would be negligible and likely not a perceptible difference compared to the Project. Further, any decrease would be offset by slight increases in noise from the at-grade parking beneath Field A. Thus, overall, operational noise and vibration impacts under Alternative 2 and the Project would be similar.

(l) Public Services

(i) Fire Protection

(a) Construction

The Project, as evaluated in Section IV.L.1, *Fire Protection*, of this Draft EIR, and Alternative 2 would involve construction activities that could affect fire protection and emergency medical services. Both Alternative 2 and the Project would implement Project Design Feature TRAF-PDF-1, to provide a Construction Management Plan to minimize impacts to vehicular and other forms of circulation during construction. Fire safety during construction would be further addressed by specific practices and procedures, including OSHA safety and health provisions, that would be implemented during construction. With

the implementation of Project Design Feature TRAF-PDF-1 and compliance with applicable safety regulations, neither Alternative 2 nor the Project would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither Alternative 2 nor the Project would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would shorten the duration of Project construction activities from 30 months to 26 months, impacts under Alternative 2 would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.1, *Fire Protection*, of this Draft EIR, and Alternative 2 would result in the occupation of and activity at the Project Site, which would require fire protection and emergency medical services. Both Alternative 2 and the Project would comply with all applicable Fire Code regulations, including a sprinkler system within the gymnasium. Further, the Project Site is located in proximity to an LAFD Fire Station 78 and, as such, is located within the required fire station response distance established by the LAMC. The Project Site also has adequate proximity to fire hydrants and fire flow to meet LAMC standards. In addition, Alternative 2 and the Project would provide for emergency access into the Project Site and would not substantially interfere with emergency access in the surrounding neighborhood. Alternative 2 and the Project would also provide a system, inclusive of Project Design Feature TRAF-PDF-2 (flashing red warning light), to maintain adequate access for emergency vehicles to enter and return to the adjacent LAFD Fire Station 78 and, thus, would not interfere with the operation of that fire station. Overall, operation of either Alternative 2 or the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts to fire protection and emergency medical services during operation under Alternative 2 and the Project would be less than significant and similar.

(ii) Police Protection

(a) Construction

The Project, as evaluated in Section IV.L.2, *Police Protection*, of this Draft EIR, and Alternative 2 would result in construction activities that could affect emergency access and require police protection services. Both Alternative 2 and the Project would implement Project Design Feature TRAF-PDF-1, a City-reviewed Construction Management Plan, to ensure that emergency access would be maintained on and adjacent to the Project Site and in the vicinity of the Project Site during construction. Both Alternative 2 and the Project would implement Project Design Feature POL-PDF-1 to require construction fencing and security lighting to reduce the potential need for LAPD services. With the

implementation of these features, neither Alternative 2 nor the Project would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither Alternative 2 nor the Project would result in potential physical impacts to police facilities. Impacts under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would shorten the duration of Project construction from 30 months to 26 months, impacts under Alternative 2 would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.2, *Police Protection*, of this Draft EIR, and Alternative 2 would result in the occupation of and activity at the Project Site, which would require police protection services. The operational demand for police protection services under either Alternative 2 or the Project would be largely offset as the result of the security services to be provided on the Project Site as part of Project Design Feature POL-PDF-2. Per Project Design Feature POL-PDF-2, Alternative 2 or the Project would incorporate a security program to ensure the safety of students, employees, public users, and spectators. These include a variety of design features, such as the provision of three security kiosks, 24-hour on-site security, security lighting, and the installation and monitoring of CCTV cameras. Project Design Feature POL-PDF-2 also outlines the patrols that will be conducted on the Project Site by on-site security. With implementation of Project Design Feature POL-PDF-2, impacts on police services under the Project and Alternative 2 would be less than significant and similar.

(iii) Parks and Recreation

(a) Construction

Under the Project, as evaluated in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, Alternative 2 or the Project, the Project Site's existing private recreational uses would be closed during construction. The closure would result in a minor impact on public parks since some existing users would likely use other public and private tennis and golf facilities in the region. However, even with the relocated golf and tennis users, the use of off-site recreational facilities and public parks is not expected to accelerate the deterioration of existing facilities that would require the need for new or physically-altered parks and recreational facilities, the construction of which would cause significant environmental impacts. As such, the impact of Alternative 2 and the Project on parks and recreational facilities would be less than significant. However, because Alternative 2 would reduce the duration of construction and the period before on-site walking and jogging paths, tennis courts, and other recreational facilities would be available to the public, impacts under Alternative 2 would be less than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, or Alternative 2, the Project Site's golf facilities would not continue in operation and tennis facilities would be reduced compared to existing conditions. Alternative 2 and the Project would include the same athletic fields, gymnasium, swimming pool, tennis courts and a relatively similar publicly accessible trail system. As discussed in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, there are 71 courts available to the public in the area serving the San Fernando Valley East Tennis League. Many of these are "first come-first served" with no fees, and other RAP courts require reservations and an hourly fee. The reservation websites for large tennis facilities in the area, such as the Sherman Oaks Tennis Center and the Balboa Tennis Center, indicate the availability of courts during a standard weekday.[5] Tennis facilities at North Hollywood Park and Studio City Recreation Center (Beeman Park) also indicated availability of courts during weekdays. Relocated tennis users could access these facilities, as well as other private tennis facilities in the region. Although the Project and Alternative 2 would result in a small number of relocated tennis users, weekday use of off-site courts is anticipated to be available and would not exceed the carrying capacity of the City's public tennis courts. In addition, the Project and Alternative 2 would be able to continue to host league matches as under existing conditions. Therefore, the Project and Alternative 2 are not anticipated to increase demand for use of tennis courts at a level that would foreseeably result in substantial adverse physical impacts due to the need for new or physically altered public tennis courts in order for the RAP to maintain adequate service ratios. Under both Alternative 2 and the Project, while the loss of the on-site golf facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically altered public, nine-hole golf courses, in order for the RAP to maintain adequate service ratios.

Furthermore, the Project and Alternative 2 would provide all-day public access to 5.4 acres of landscaped walking trails, direct access to the Zev Greenway, and public use of the community room in the gymnasium building in an area that lacks neighborhood park facilities. Other facilities, such as the multi-purpose athletic fields, swimming pool, gymnasium, and eight tennis courts, would be available to the public with reservations. These features would reduce demand for off-site parks and recreation uses and meet the criterion of neighborhood park uses within walking distance of the surrounding neighborhood, as well as provide the highest priority recreational uses (walking paths) and high priority uses (gymnasium and swimming pool) identified in the RAP's Citywide Community Needs Assessment for the South San Fernando Valley geographic area. Therefore, Alternative 2 and the Project would not require the need for new or physically-altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. Impacts to public

[5] Websites for these uses were accessed on Thursday, February 11, 2021, during clear weather and temperatures of 64 degrees. Field check for available tennis courts at North Hollywood Park and Studio City Recreation Center was performed at 11:00 a.m. on the same day.

parks and recreational facilities during operation of Alternative 2 and the Project would be less than significant and similar.

(m) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

The Project, as evaluated in Section IV.M, *Transportation*, of this Draft EIR, and Alternative 2 would support multimodal transportation options (shuttling) and a reduction in VMT associated with the existing Project Site (consistent with LADOT's methodology which excludes the Project's VMT components related to community use), as well as promote transportation-related safety in the Project area. Neither Alternative 2 nor the Project would conflict with policies of the Mobility Plan 2035 adopted to protect the environment and reduce VMT. Both Alternative 2 and the Project would be consistent with applicable transportation goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan to discourage non-residential traffic flow onto neighborhood streets and with the Community Plan and Los Angeles River Master Plan Landscaping Design Guidelines and Plant Palettes to increase accessibility to the Los Angeles River. Driveway design under both the Project and Alternative 2 would exceed the 30-foot maximum driveway width under MPP Section 321. The widths of the driveways would enhance safety by accommodating a median island to restrict turns into and out of the driveway or serve as an extension of broader Valleyheart Drive. While the Project and Alternative 2 would not be consistent with the MPP Section 321 requirement, the inconsistency would not result in increased circulation, pedestrian or vehicular conflicts and, as such, would be less than significant. Neither Alternative 2 nor the Project would conflict with the Plan for a Healthy Los Angeles by providing for pedestrian and bicycle access. Because neither Alternative 2 nor the Project would conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, transportation impacts would be less than significant and similar.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The Project as evaluated in Section IV.M, *Transportation*, of this Draft EIR, and Alternative 2 would generate an estimated total daily VMT of 3,932 miles. Subtracting the Project and Alternative 2's VMT from existing conditions (VMT of 6,030 miles), Alternative 2 and the Project would result in an estimated net decrease of 2,098 daily VMT compared to existing conditions. This reduction is consistent with LADOT's methodology which excludes the Project's VMT components related to community use. Therefore, as Alternative 2 and the Project would result in a net decrease in daily VMT compared to existing conditions, impacts regarding VMT would be consistent with the LADOT's TAG related to trip reduction and, thus, would be consistent with CEQA Guidelines Section

15064.3(b). Therefore, VMT impacts under both Alternative 2 and the Project would be less than significant and similar.

(iii) Geometric Design Hazards

The Project as evaluated in Section IV.M, *Transportation*, of this Draft EIR, and Alternative 2 would remove the existing parking lot on Whitsett Avenue and provide for two driveways into the Project Site. Under the Project and Alternative 2, one 39-foot-wide driveway would be provided on Whitsett Avenue, several hundred feet south of Valley Spring Lane, with a second driveway taking access on Valleyheart Drive just south of LAFD Fire Station 78. The Whitsett Avenue driveway would enhance safety by accommodating a median island to restrict turns into and out of the driveway to right-turns only. Both driveways would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. In addition, pedestrians and bicycles would have separate entrances to the Project Site from the vehicular driveways. Neither Alternative 2 nor the Project would add vehicular traffic that would exceed the queuing capacity of nearby freeway off-ramps. Thus, impacts with respect to geometric design hazards under Alternative 2 and the Project would be less than significant and similar.

(iv) Emergency Access

(a) Construction

The Project as evaluated in Section IV.M, *Transportation*, of this Draft EIR, and Alternative 2 would include temporary construction activities and generate construction vehicle trips that could potentially affect emergency access to the Project Site and surroundings. Alternative 2 would export 123,223 cubic yards of excavated materials, which would generate 17,600 truck trips. The Project would export 250,000 cubic yards of excavated materials, which would generate 35,714 haul truck trips. Potential congestion affecting emergency access under Alternative 2 or the Project would be addressed through Project Design Feature TRAF-PDF-1, via implementation of a CMP. The CMP would provide designated haul routes, a staging plan, and programs to be reviewed by the LADOT, to ensure that access to neighborhood and collector streets in proximity to the Project Site remain unobstructed. Project Design Feature TRAF-PDF-1 also requires coordination with emergency service providers to ensure adequate emergency access. With implementation of the CMP, construction activities would not result in obstructed emergency access in the area. Therefore, emergency access impacts during construction, under both Alternative 2 and the Project would be less than significant. However, because Alternative 2 would reduce the duration of Project construction and construction truck trips, impacts would be less under Alternative 2 than under the Project.

(b) Operation

As described in Section IV.M, *Transportation*, of this Draft EIR, the Project Site is located in an established urban area served by a roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Project Design Feature TRAF-PDF-2,

which requires a driveway warning signal, would prevent conflicts between Alternative 2 or the Project's vehicle traffic and fire emergency vehicles leaving from or arriving to LAFD Fire Station 78. On surrounding roadways, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or Alternative 2. Under both Alternative 2 and the Project, driveways would be subject to LAFD review to confirm that adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, neither Alternative 2 nor the Project would impair implementation of, or physically interfere with, adopted emergency response or emergency evacuation plans. Impacts with respect to emergency access under Alternative 2 and the Project would be less than significant and similar.

(n) Tribal Cultural Resources

Under the Project, as discussed in Section IV.N, *Tribal Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 2 would eliminate the Project's subterranean parking garage and underground stormwater capture and reuse system. Construction under Alternative 2 would include excavation to four feet for the Field A structure and similar excavation as the Project for the gymnasium building and pool. Excavation activities under both Alternative 2 and the Project would have the potential to encounter previously undiscovered subsurface tribal cultural resources. The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC indicated no known tribal cultural resources within the Project Site or surrounding area. Should archaeological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, neither Alternative 2 nor the Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. As such, Alternative 2 and the Project would result in less than significant impacts to tribal cultural resources. However, because Alternative 2 would substantially reduce the extent of excavation activities, impacts to tribal cultural resources would be less under Alternative 2 than under the Project.

(o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste

(i) Water Supply

(a) Construction

Construction activities associated with the Project, as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR, and Alternative 2 would require

approximately 1,000 to 2,000 gpd of water for dust control and other construction activity. The intermittent construction-related water demand would be met by LADWP's available water supplies. As such, adequate water supplies would be available from existing entitlements and resources for construction activities. LADWP has sufficient water supplies to serve Alternative 2 and the Project into the reasonably foreseeable future during normal, dry, and multiple-dry years. Any construction relative to the water delivery system for Alternative 2 or the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. Therefore, Alternative 2 and the Project's impacts on water supply during construction would be less than significant. However, because Alternative 2 would reduce the duration and scale of earthwork, water required for construction activity would be less under Alternative 2 than under the Project.

(b) Operation

The Project, as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply*, of this Draft EIR, and Alternative 2 would result in a similar operational water demand. Alternative 2 and the Project's water demand would be approximately 39,872 gpd (44.65 AFY). As with the Project, Alternative 2 would implement Project Design Feature WS-PDF-1 regarding the use of artificial turf to reduce irrigation demand. However, Alternative 2 would not implement Project Design Feature WS-PDF-2 to use the Project's stormwater capture and reuse system to reuse captured and treated stormwater for irrigation water. Depending on rainfall frequency and volume, a minimum of one-third (approximately 3.3 AFY) of the Project's total annual irrigation demand (approximately 10 AFY) is expected to be provided by the Project's one-million-gallon stormwater capture and reuse system. The LADWP's water infrastructure and water supply are sufficient to meet demand and, as such, the impact of Alternative 2 and the Project related to the provision of water services would be less than significant. However, because Alternative 2 would not implement Project Design Feature WS-PDF-2 to reduce irrigation demand, impacts related to water supply would be greater under Alternative 2 than under the Project.

(ii) Wastewater

(a) Construction

Under the Project, as evaluated in Section IV.O.2, *Utilities and Service Systems - Wastewater*, of this Draft EIR, and Alternative 2, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Construction of Alternative 2 or the Project would include all necessary on- and off-site sewer pipe improvements and connections. If existing sewer lines are found to be substandard or deteriorated, the necessary

improvements would be required to achieve adequate service under the City's Building and Safety Code and LADWP requirements. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. With the use of portable facilities during construction and implementation of any necessary upgrades, impacts to wastewater facilities under either Alternative 2 or the Project would be less than significant and similar.

(b) Operation

The Project, as evaluated in Section IV.O.2, *Wastewater*, of this Draft EIR, and Alternative 2 would result in a similar increase in daily wastewater generation over existing conditions. Alternative 2 and the Project are estimated to have a maximum, worse-case day wastewater generation of approximately 527,524 gpd, or approximately 0.527 mgd. This demand takes into account the possible need for a full flush of the 52-meter pool concurrent with peak wastewater generation from every other source on the Project Site (although a full flush is a rare occurrence and may occur only a few times a year). Both Alternative 2 and the Project would reduce potential impacts to the local sewer system during operation with the implementation of Mitigation Measure WW-MM-1, to discharge the swimming pool at a rate of no more than 166,000 gallons per day and Mitigation Measure WW-MM-2 to 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. As such, Alternative 2 and the Project's additional wastewater demand would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. With these mitigation measures, impacts to wastewater facilities under both Alternative 2 and the Project would be less than significant and similar.

(iii) Solid Waste

(a) Construction

The Project, as evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste*, of this Draft EIR, and Alternative 2 would result in the same volume of demolition debris. With the demolition of existing uses slated for removal, the Project would generate an estimated 397,493 tons (pre-diversion) and 99,373 net tons of C&D waste. Of this total, 375,000 tons is exported soil (250,000 cubic yards). Since Alternative 2 would reduce the Project's soil export of 250,000 cubic yards to 123,223 cubic yards, it would reduce the tonnage of exported soils from 375,000 to 184,835, or a reduction of 190,165 tons. Both Alternative 2 and Project C&D waste totals represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill, or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under either Alternative 2 or the Project would be less than significant.

However, because Alternative 2 would result in less C&D waste, impacts would be less under Alternative 2 than under the Project.

(b) Operation

The Project, as evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste*, of this Draft EIR, and Alternative 2 would result in a similar occupation and activity at the Project Site and thus would have similar solid waste generation. Assuming a diversion rate of 65 percent during Alternative 2 or the Project's operation phase, each would generate 63 tons (post-diversion) of solid waste per year. Alternative 2 or the Project's solid waste disposal would represent approximately 0.0006 percent of the County's remaining landfill capacity in 2025. Alternative 2 and the Project's additional solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant and similar.

(3) Relationship of the Alternative to Project Objectives

Alternative 2, the At Grade Parking Alternative, would elevate Field A to accommodate parking at ground level under the raised playing field. This feature would eliminate the subterranean garage. Alternative 2 would also eliminate the Project's one-million-gallon capture and reuse stormwater system. Thus, Alternative 2 would reduce the excavation volumes needed to construct these facilities. Alternative 2 would provide the same range of recreational uses, gymnasium, publicly accessible open space, and walking/jogging paths as under the Project. As the underlying purpose of the Project is 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, Alternative 2 would be fully consistent with the following Project Objectives:

Objective 1: Develop a state-of-the-art indoor and outdoor athletic and recreational facility to support the School's existing athletic programs and co-curricular activities, including basketball, soccer, football, track and field, tennis, swim, water polo, volleyball, fencing, weight training, dance, yoga, physical fitness, and wrestling programs.

Objective 2: Provide opportunities for shared use of a variety of types of recreational facilities and activities for the community.

Objective 3: Provide opportunities for academic use of the Project Site through science labs and outdoor classes, water quality monitoring, bird watching, and other non-athletic school activities.

Objective 4: Create new publicly accessible open space with a broad array of recreational facilities in a safe and secure environment for the surrounding community and the public to use similar to a City-owned park, while also providing a community room, café, and indoor and outdoor areas for public gatherings, performances, and occasional special events.

Objective 5: Increase public access to and enhance the adjacent Los Angeles River and Zev Greenway through a network of publicly accessible pathways, a new direct connection to the Zev Greenway, and a landscape plan that would restore native plant communities, create habitat for various species, and support the goals of the Los Angeles River Improvement Overlay District Ordinance, the Los Angeles River Revitalization Master Plan, and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.

Objective 6: Implement a tree planting program that substantially increases the number of trees on the Project Site with native and RIO-compliant tree species, while removing invasive exotic and non-RIO compliant tree species.

Objective 9: Retain and rehabilitate the existing clubhouse with café, associated putting green, low brick retaining wall, and golf ball-shaped light standards for public use and leisure to convey their historic value as character defining features of the Historic-Cultural Monument, the Studio City Golf and Tennis Club (now Weddington Golf & Tennis), as a post-World War II recreational facility and as an important local example of Ranch style architecture.

Alternative 2 would elevate Field A by 15 feet above grade, which would increase the heights of the Field A bleachers to 30 feet and the pole lights to 85 feet. The elevated Field A would represent a greater contrasting feature in the context of existing views (all at grade features) with the Project Site's character defining features as viewed from the public right-of-way. Thus, Alternative 2 would be substantially consistent, but not to the same extent as the Project, with the following policy:

Objective 7: Promote compatibility with the surrounding neighborhood through a design that (1) includes mature trees and extensive landscaping along the northern edge of the Project Site; (2) reduces off-site noise effects through placement of recreational facilities internal to the Project Site, use of landscaped walls and berms, and use of canopy structures adjacent to pool and playfield areas; (3) limits light spillover and glare through use of field lights with light-emitting diode (LED) technology, timer controls, and shields that comply with LAMC and RIO requirements; (4) provides ample on-site parking and prohibits off-site parking; and (5) maximizes public safety through 24-hour, seven-day a week on-site security, monitored points of entry, and enforcement of a prohibition on off-site parking.

Alternative 2 would eliminate the stormwater capture and reuse system, which would treat on-site stormwater runoff as well as from a 39-acre residential area to the north of the Project Site. The capture and reuse system, depending on rainfall frequency and volume, would provide a minimum of one-third of the Project's total annual irrigation water demand. As a result, Alternative 2 would only be partially consistent with the following Project Objective:

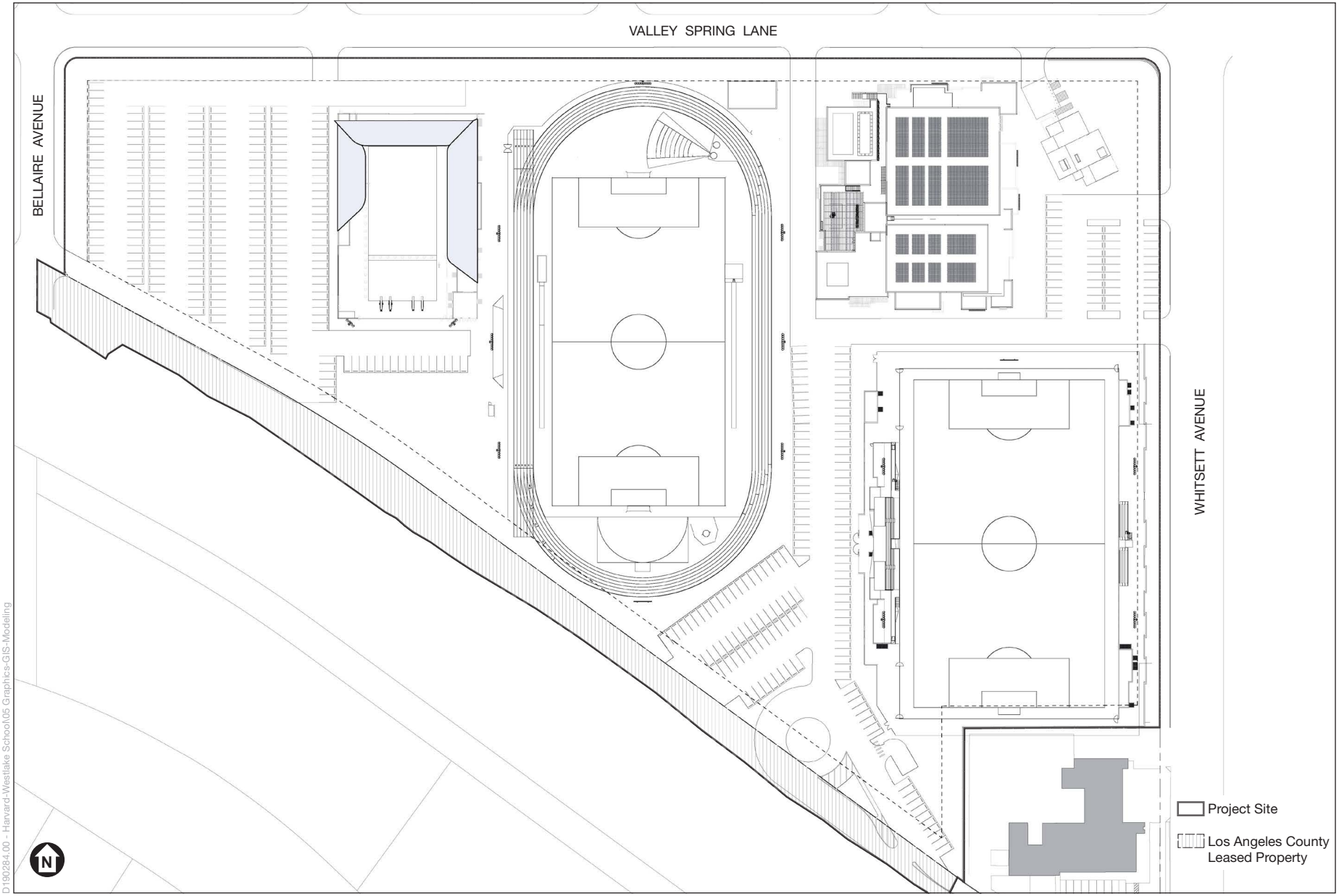
Objective 8: Incorporate sustainable and green building design through such features as a stormwater capture and on-site reuse system to improve water quality by treating runoff from the Project Site and adjacent areas that now flows directly to the Los Angeles River; a landscape plan featuring native and RIO-compliant plant species with low to medium water demand; elimination of turf and use of artificial grass to reduce water demand and use of pesticides; solar voltaic panels and energy efficient building design; electric vehicle charging stations; and bike facilities.

c) Alternative 3: Reduced Density and Programming Alternative

(1) Description of the Alternative

Alternative 3 would reduce the Project's scale of development and programming. As shown in **Figure V-1**, *Alternative 3 Conceptual Site Plan*, the primary physical changes compared to the Project include the elimination of the tennis courts and relocation of the Project's other recreational facilities. Alternative 3 would also eliminate the Project's 503-space subterranean parking garage and the one-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).

Vehicle parking under Alternative 3 would be provided at grade, within space freed up by removal of the tennis courts and through reconfiguration of the remaining recreational facilities including the gymnasium building, the pool, and the two athletic fields. As shown in Figure V-1, parking would be located within three surface parking lots. The largest parking lot, which would contain 238 parking spaces, would be located in the west sector of the Project Site southeast of the intersections of Bellaire Avenue and Whitsett Avenue. This lot would be accessed via a single driveway off Valley Spring Lane. The second largest parking lot, which would contain 136 parking spaces, would be located in the south and central portions of the Project Site. This lot would be accessed via a primary driveway off Valleyheart Drive. A secondary driveway to this parking lot off Valley Spring Lane would provide a through connection to Valleyheart Drive. The smallest of the parking lots, which would contain 59 parking spaces, would be located on the east boundary to the south of clubhouse and would be accessed via two driveways off Whitsett Avenue. A total of 433 vehicle parking spaces would be provided under this layout, compared to 503 spaces under the Project. Alternative 3 would implement similar procedures as the Project to prohibit off-site parking in the neighborhood.



D190284.00 - Harvard-Westlake School\05 Graphics-GIS-Modeling

SOURCE: Gensler, 2021

Harvard-Westlake River Park Project

Figure V-1
Alternative 3 Conceptual Site Plan

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.

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.

Under Alternative 3, no excavation for subterranean parking would be needed, as compared to 148,000 cy of soil export (10,571 trucks or 21,142 truck trips) for the subterranean garage under the Project. Alternative 3 would also not include the Project's one-million-gallon underground capture and reuse stormwater system, which requires 11,900 cy of soil export (850 trucks or 1,700 truck trips). Thus, 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.

Alternative 3 would require the same entitlements requested for the Project, including a Vesting Conditional Use Permit to allow the operation of a private-school athletic and recreational campus in the A1 zone; allowance of light poles over 30 feet; and allowance of privacy walls and fences up to 10 and 11 feet.

(2) Environmental Impacts

(a) Aesthetics/Visual Resources

(i) Light and Glare

(a) Construction

Construction for the Project, as evaluated in Section IV.A, *Aesthetics*, of this Draft EIR, and Alternative 3, would primarily take place during daylight hours in accordance with LAMC Section 41.40 requirements. Any construction lighting would be for security purposes only. During construction, all existing light sources, such as evening tennis

lighting, would be discontinued and, as such, the Project Site would not be a meaningful source of light. Because of minimal lighting during the construction phase, impacts related to light and glare would be less than significant and similar under Alternative 3 and the Project.

(b) Operation

The Project, as evaluated in Section IV.A, *Aesthetics*, of this Draft EIR and Alternative 3 would implement a lighting program. 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 compared to the Project. In addition, with the elimination of the tennis courts, operating hours and outdoor activity on the Project Site would end at 8:00 p.m., compared to 9:00 p.m. as proposed by the Project for the tennis courts, thus, reducing the hours during which the pole lights would be in use. Alternative 3 and the Project would both incorporate LED scoreboards for the fields and pool area, security lighting for pathways and courtyards, and building lights for the gymnasium. Under both Alternative 3 and the Project, the golf ball-shaped light standards would be relocated and fitted with optic control to reduce glare and the 128 existing, high-glare (500-watt flood lights) for the existing tennis courts (the Project Site's current highest light and glare source would be removed). Alternative 3 and the Project's lighting program would not exceed LAMC light and glare standards, including RIO standards of maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the Project Site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site. As such, Alternative 3 and the Project's light and glare impacts would be less than significant. However, because Alternative 3 would reduce the overall pole lighting and hours of evening operation, impacts would be less under Alternative 3 than under the Project.

(b) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

During the construction phase, the Project, the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3 would comply with SCAQMD emissions control regulations and CARB requirements to minimize short-term emissions from on- and off-road diesel emissions. With implementation of Mitigation Measure AQ-MM-1, impacts related to the timely attainment of air quality standards or interim emission reductions specified in the AQMP would be reduced to below threshold levels. In addition, Alternative 3 and the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based. Since its localized construction emissions would be less than significant without mitigation, and its regional construction emissions would be less than significant with implementation of the required mitigation measure, neither Alternative 3 nor the Project would obstruct implementation of the 2016 AQMP. Overall, potentially significant impacts related to the potential to conflict with or obstruct the implementation of the applicable air quality plan under

Alternative 3 and the Project would be reduced to less than significant with implementation of Mitigation Measure AQ-MM-1. Because both Alternative 3 and the Project would similarly comply with the AQMP, impacts would be similar.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3 would provide a range of new recreational uses that would generate operational emissions. Alternative 3 would not include the Project's tennis courts and would reduce overall operation, including concurrent athletic activities. Under Alternative 3, 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). However, both Alternative 3 and the Project would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during operation. Impacts with respect to AQMP consistency under Alternative 3 and the Project would be less than significant. Because both Alternative 3 and the Project would similarly comply with the AQMP, impacts would be similar.

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3's and the Project's construction activities have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment that would potentially increase the frequency or severity of an existing violation. Construction of Alternative 3 or the Project could cause or contribute to new violations for exceedance of regional NOX emissions. Construction emissions under the Project or Alternative 3 would not exceed the SCAQMD regional significance thresholds for VOCs, CO, SO2, PM10, and PM2.5. Implementation of Mitigation Measure AQ-MM-1 by the Project or Alternative 3, which would require machinery and vehicle emissions controls, would reduce short-term and temporary NO_X emissions, including emissions from haul trucks during the grading activities to below the regional emission significance threshold. With this mitigation measure, Alternative 3 and the Project's impacts would be less than significant. However, while maximum daily emissions would be similar, because Alternative 3 would substantially reduce the overall extent of excavation activities and the use of heavy-duty excavation equipment, haul truck trips, and overall construction duration from 30 months to 19 months compared to the Project. Alternative 3's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3 would provide recreational uses on the Project Site that would generate operational

emissions. However, Alternative 3 would eliminate the Project's tennis courts and reduce outdoor evening activities. Alternative 3 would, therefore, reduce concurrent athletic activities and overall operational emissions associated with students, spectators and the public traveling to/from the tennis courts. Alternative 3 and the Project's mobile, stationary, and area source criteria pollutants emissions would not exceed the SCAQMD thresholds of significance. Regional operational emission impacts under Alternative 3 and the Project would be less than significant. However, because Alternative 3 would reduce operational trips, impacts would be less under Alternative 3 than under the Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations – Localized Emissions

(a) Construction

Construction activities under the Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3 would generate localized emissions. Both Alternative 3 and the Project's maximum daily construction emissions would not exceed the SCAQMD localized significance thresholds. As such, localized construction emissions impacts to sensitive receptors under both Alternative 3 and the Project would be less than significant. However, while maximum daily emissions would be similar, because Alternative 3 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 19 months compared to the Project. Alternative 3's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3's daily emissions of NO_X, CO, PM10, and PM2.5 related to energy use and use of coatings, consumer products, and landscaping products would be substantially less than the SCAQMD's significance thresholds. As such, impacts under both Alternative 3 and the Project would be less than significant. With the elimination of the tennis courts under Alternative 3, energy demand related to lighting and maintenance would be incrementally reduced compared to the Project. Localized emissions under the Project related to energy use are less than 0.5 lbs per day. Thus, the difference in daily operational emissions between Alternative 3 and the Project would be less than 0.5 lbs per day. Accordingly, localized emissions impacts under Alternative 3 would be incrementally less than under the Project.

(iv) Carbon Monoxide Hotspots

The most heavily impacted intersection in the area with the potential to result in carbon monoxide hotspots is Coldwater Canyon Avenue at Ventura Boulevard. Analysis of this intersection provided in Section IV.B, *Air Quality,* of this Draft EIR demonstrated that, during operation, Project vehicle trips would not contribute to the formation of CO hotspots that would exceed threshold standards at this location. Impacts related to CO hotspots

would be less than significant. Alternative 3 would have less overall construction trips compared to the Project due Alternative 3's reduction in excavation and shorter duration of the construction phase and operational trips would be fewer in number than the Project due to the removal of the tennis courts. Because construction traffic would be less than under Project operation, impacts during construction of Alternative 3 would also be less than significant. Since Alternative 3 and the Project would not substantially contribute to the formation of CO hotspots, impacts related to CO hotspots would be less than significant under both the Project and Alternative 3. Because Alternative 3 would result in fewer overall trips due to less construction trips, impacts under Alternative 3 would be less than the Project.

(v) Toxic Air Contaminants

(a) Construction

Under the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. TACs are described in terms of individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (19 months under Alternative 3 and 30 months under the Project), construction of Alternative 3 and the Project would not result in a long-term exposure. Alternative 3 would reduce the Project's TACs with its substantial reduction in excavation, reduction in the use of heavy-duty excavation equipment, and the reduction in haul trips for export of excavated materials. Under both the Project and Alternative 3, hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, would be similarly managed and disposed of in accordance with applicable laws and regulations. The nearest residential air quality sensitive receptors are located adjacent to the Project Site to the east, north, and west. Based on the short-term duration of Alternative 3 and Project construction and compliance with regulations that would minimize emissions, such receptors would not be exposed to substantial TAC concentrations. Impacts related to TACs would be less than significant under both the Project and Alternative 3. However, while maximum daily emissions would be similar, because Alternative 3 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 19 months compared to the Project, Alternative 3's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 3 would not include any heavy truck use during operation and would generate only minor amounts of diesel emissions from mobile sources that would not exceed the SCAQMD's project screening criteria of 100 trucks per day, and would have a less than significant impact relative to TAC emissions. Alternative 3 and the Project are expected to generate minimal emissions from sources such as consumer products and architectural coatings. Also, Alternative 3 or Project impacts related to the inhalation of vapors and particulates

in the air space above an artificial turf field, ingestion of artificial turf products, and dermal contact with artificial turf products would be less than significant because evidence does not support a conclusion of a significant increase in health risks. Thus, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled under both Alternative 3 and the Project and TACs would not exceed the SCAQMD significance levels. Impacts under both Alternative 3 and the Project would be less than significant and similar.

(c) Biological Resources

(i) Candidate, Sensitive, or Special Status Species

Development of the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 3 would result in the direct removal and replacement of a number of ornamental, non-native and, in some cases, invasive tree species and other common ornamental plant species. No candidate, sensitive or special status plant species would be directly impacted by the construction of the Project or Alternative 3. Indirect impacts to special status plant species during construction and operation of the Project and Alternative 3 would be limited, if any, such that indirect impacts would be less than significant.

Common and non-indigenous wildlife species to be temporarily displaced during construction of the Project or Alternative 3, with the exception of a western yellow bat species (species of special concern), do not meet the significance threshold of candidate, sensitive, or special status wildlife species. Impacts on the western yellow bat during construction of the Project or Alternative 3 would be potentially significant and, as such, Mitigation Measure BIO-MM-1 would be implemented to provide for protection of the western yellow bat's roosting habitat. With this mitigation measure, the Project's or Alternative 3's impact on candidate, sensitive, or special status wildlife species during construction would be reduced to a level that is less than significant. Operation of the Project or Alternative 3 would result in no direct impacts to candidate, sensitive or special status wildlife species. During operation of the Project or Alternative 3, indirect impacts to special status bat species associated with a change in the on-site ambient lighting would be low and minimal operational lighting impacts would not diminish the chances for long-term survival of a special status bat species. Further, a change in the on-site operational noise levels and associated human activities would be low and would not diminish the chances for long-term survival or significantly impact special status bat species. Therefore, under both the Project and Alternative 3, operational indirect impacts to candidate, sensitive or special status wildlife species would be less than significant.

Overall, with mitigation, impacts on candidate, sensitive, or special status species under both the Project and Alternative 3 would be reduced to a level that is less than significant and impacts would be similar.

(ii) Riparian Habitat and Other Sensitive Communities

The off-site portion of the Biological Study Area along the Zev Greenway supports 0.88 acre of California brittlebush scrub, a sensitive natural community. The Zev Greenway connection trail, perimeter fencing, and River overlook under both the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 3 would impact 0.14 acres of recently restored California brittlebush scrub, which comprises 16 percent of the off-site sensitive natural community. Although impacts would be limited, direct impacts to this sensitive natural community would be potentially significant and, as such, Mitigation Measure BIO-MM-2 would be implemented under both Alternative 3 and the Project to replace removed brittlebush scrub on a 1:1 ratio. Therefore, with this mitigation measure, the Project and Alternative 3's impact on sensitive communities would be reduced to a level that is less than significant and impacts would be similar.

(iii) Movement of Wildlife or Nursery Sites

Under the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 3, the Biological Study Area does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s). As such, no impacts would occur to regional movement. Although implementation of Alternative 3 and the Project would result in temporary disturbances to local wildlife movement within the Biological Study Area with the removal of landscape trees that may be used by birds and bats, those species are adapted to urban areas and would be expected to persist on-site following construction because a significant number of native replacement trees would be planted on-site additional native shrub habitat would be planted that would provide habitat value not currently existing on-site by expanding the habitat, creating a greater native seed source, and providing a larger buffer from non-native ornamental landscaping in the surrounding developed areas. Alternative 3 would likely remove approximately 10 additional existing trees in the central portion of the Project Site associated with Field B construction, as compared to the Project, all of which would be replaced. Therefore, Alternative 3 and Project impacts on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors would be less than significant. Nonetheless, Alternative 3 or Project construction activities could potentially disturb songbird and raptor nests and significantly impact these biological resources. Mitigation Measure BIO-MM-3 would be implemented to demonstrate compliance with regulatory requirements for nesting bird protection, and Project Design Feature PDF-BIO-1 would be implemented to reduce any direct impacts to nesting birds and roosting bat species. Therefore, with these mitigation measures, impacts under Alternative 3 or the Project on nursery sites would be reduced to a level that is less than significant. While Alternative 3 may include slightly less shrubbery plantings and up to approximately 10 additional trees removed (all of which would be

replaced) as compared to the Project, the ability of the Project Site to support movement of wildlife or nursery sites would be similar, and as such, impacts would be similar under Alternative 3 and the Project.

(iv) Conflict with Policies or Ordinances Protecting Biological Resources

The Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 3 would provide publicly accessible recreational and open space uses in the Biological Study Area while improving public access to connect these uses to the River-adjacent Zev Greenway. The provision of open space and facilitated public access to the Los Angeles River would be consistent with the City's Open Space Element and the RIO District Ordinance. Alternative 3 and the Project's plant materials would consist entirely of native plants that have low to medium water demand, and landscape design includes the maintenance and planting of healthy trees that are consistent with the RIO District Ordinance and Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The Project would include an underground stormwater capture and reuse system that would treat on-site stormwater as well as stormwater from a 39-acre residential area to the north, which would not be constructed under Alternative 3. Alternative 3 would comply with applicable LAMC LID regulations (LAMC Section 12.84), which require that all new development retain 100 percent of the SWQDv on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all SWQDv discharged from the site. While Alternative 3 would comply with LID regulations, it would only capture and treat stormwater originating from within the Project Site. Stormwater treatment under both Alternative 3 and the Project would support improving the health of the City's watersheds, which is a goal of the RIO District Ordinance. Neither the Project nor Alternative 3 would conflict with City policies and ordinances protecting biological resources and, therefore, impacts would be less than significant. However, because Alternative 3 would provide stormwater treatment to a lesser extent than the Project, it would achieve policies related to improving the health of the watershed to a lesser extent than the Project, and as such, impacts would be greater under Alternative 3 than under the Project.

(v) City-Protected and Non-Protected Significant Trees and Shrubs

The Project as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, would result in the removal of 209 non-protected significant trees and 31 City-protected public street trees. Alternative 3 would remove the same trees as under the Project plus approximately 10 additional existing trees in the central portion of the Project Site associated with Field B construction, as compared to the Project. Alternative 3 and the Project would, therefore, result in a potentially significant impact related to City-protected and non-protected trees. Mitigation Measure BIO-MM-3 would be implemented to require replacement of all non-protected significant trees at a minimum 1:1 ratio and street trees at a ratio of typically 2:1. Alternative 3 and the Project would result in a net increase of

153 trees comparted to the existing 421 inventoried trees within the Biological Study Area. Therefore, with the required mitigation measure, Alternative 3 and the Project's impact on City-protected trees and non-protected significant trees would be reduced to a level that is less than significant and impacts would be similar.

(d) Cultural Resources

(i) Historical Resources

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 3 would retain the recreational character of the Project Site, and would maintain 5.4 acres of open space. Both Alternative 3 and the Project would implement Project Design Feature CULT-PDF-1 to retain and provide 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. This includes retaining the clubhouse in its historic location, and maintaining the character-defining features of the Project Site, including the putting green, low brick retaining wall, clubhouse, and relocating the golf ball-shaped light standards, which have been historically visible from the public right-of-way. Further, Project Design Features CUL-PDF-2 and CUL-PDF-3 would be implemented by Alternative 3 and the Project which require that the extant features of the Project Site are documented in a HABS survey and an interpretive exhibit displaying the history of the Project Site to be housed on the Project Site, respectively. With the Project Design Features in place, Alternative 3 and Project impacts on historic resources would be less than significant. However, compared to the Project, the two-story gymnasium under Alternative 3 would be located immediately adjacent to the west of the clubhouse along Whitsett Avenue. In this location, the gymnasium would represent a greater contrasting feature in the context of existing views (all at grade features) with the Project Site's character defining features from the public right-of-way. Thus, because Alternative 3 would result in a greater contrast to the Project Site's character defining features, impacts to historical resources would be greater under Alternative 3 than under the Project.

(ii) Archaeological Resources

Under the Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 3 would eliminate the Project's subterranean parking garage and stormwater capture and reuse system. Construction under Alternative 3 would include excavation to four feet for the Field A structure and similar excavation as the Project for the gymnasium building and pool. Excavation activities under both Alternative 3 and the Project would have the potential to encounter previously undiscovered subsurface archaeological resources. Should archaeological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard

condition of approval, neither Alternative 3 nor the Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because Alternative 3 would substantially reduce the extent of excavation activities due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, impacts to archaeological resources would be less under Alternative 3 than under the Project.

(iii) Human Remains

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 3 would require grading, excavation, and other construction activities that have a potential to disturb previously undiscovered human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of the human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, impacts under Alternative 3 and the Project related to human remains would be less than significant. However, because Alternative 3 would substantially reduce the extent of excavation activities compared to the Project due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, impacts related to human remains would be less under Alternative 3 than under the Project.

(e) Energy

(i) Construction

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 3 are not expected to consume natural gas during construction, but would use electricity, as well as gasoline and diesel fuels associated with on- and off-road construction vehicles. One aspect of the construction phase, the export of excavated materials, is expected to require 35,714 truck trips to haul 250,00 cubic yards of materials under the Project, and 12,872 truck trips to haul 90,100 cubic yards of materials under Alternative 3. Because Alternative 3 would shorten construction duration and hauling activity due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, it would reduce the Project's overall demand for electricity and fuel. Construction would utilize energy only for necessary construction activities, and construction of Alternative 3 and the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Because Alternative 3 and the Project would not result in an increase in demand for electricity and fuels that would exceed available supply or distribution infrastructure capabilities, they would not require the broad construction of new energy facilities or expansion of existing facilities, the construction of

which could cause significant environmental effects. As such, energy impacts under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would reduce the scale and duration of construction activity compared to the Project, impacts would be less under Alternative 3 than under the Project.

(ii) Operation

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 3 would include development of new recreational features and activity at the Project Site, which would generate new energy demand. The Project's annual average operational electricity usage would be approximately 2,617,043 kWh. Natural gas would be approximately 1,663,510 cubic feet. Transportation would result in an annual demand of 131,955 gallons of gasoline and 14,756 gallons of diesel. Demand would be within the handling capacity of suppliers. Alternative 3 would eliminate the Project's tennis courts and 12 sports light fixtures associated with the tennis courts, as well as reduce the evening operating hours at the Project Site. With the elimination of the tennis courts and associated lighting infrastructure, Alternative 3 would incrementally reduce the Project's electricity usage. Additionally, transportation gasoline and diesel usage would also be incrementally reduced since students, spectators and the public traveling to/from the tennis courts would not occur under Alternative 3. Operation of both Alternative 3 and the Project would comply with the CALGreen Code's energy saving measures. In addition, sustainability measures, such as a solar photo-voltaic array system and LED lighting, would be implemented to reduce energy demand under both Alternative 3 and the Project. Operation of Alternative 3 or the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, energy impacts under Alternative 3 and the Project would be less than significant. However, because Alternative 3 would reduce the Project's energy demand associated with the elimination of the tennis courts as described above, impacts would be less under Alternative 3 than under the Project.

(f) Geology and Soils

(i) Geologic Hazards

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 3 would implement engineering controls and comply with regulations for planned excavation and construction activities that would minimize any potential geologic hazards at the Project Site, including fault rupture, seismic shaking, liquefaction, or other geologic conditions. Therefore, development of Alternative 3 or the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by the Project's exacerbation of existing environmental conditions. Impacts related to exacerbation of existing geologic conditions under both Alternative 3 and the Project would be less than significant and similar.

(ii) Soil Erosion or Loss of Topsoil

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 3 would require grading and excavation of soils, which would potentially increase erosion or loss of topsoil. By eliminating the Project's subterranean parking garage and one-million-gallon stormwater capture and reuse system, Alternative 3 would reduce the Project's soil export of 250,000 cubic yards to 90,100 cubic yards, which is a reduction of 159,900 cubic yards. Construction activities under both Alternative 3 and the Project would be carried out pursuant to the 2019 CBC and the requirements of the NPDES General Construction Permit. Both Alternative 3 and the Project would be required to implement a SWPPP with incorporated BMPs to control soil erosion during the Project's construction period. With compliance with applicable LAMC and regulatory requirements, impacts associated with substantial erosion or loss of topsoil would be less than significant under both Alternative 3 and the Project. However, because Alternative 3 would reduce both the scale of excavation and the duration of construction activity compared to the Project, impacts would be less under Alternative 3 than under the Project.

(iii) Unstable Geologic Units

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 3 would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of either Alternative 3 or the Project, or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Under both Alternative 3 and the Project, all required excavations would be shored as required under the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. Further, as required by the Building Code, both Alternative 3 and the Project would adhere to a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts under Alternative 3 and the Project with respect to unstable geologic units would be less than significant and similar.

(iv) Expansive Soils

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 3 would comply with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization in accordance with the 2019 CBC, and proper engineering erosion control and proper engineering drainage design). Both would address expansive soils through City Building Code regulations pertinent to foundation stability to ensure that expansive soils or other unstable soils are removed, as necessary. Because both Alternative 3 and the Project would remove expansive soils, impacts with respect to expansive soils under both Alternative 3 and the Project would be less than significant and similar.

(v) Paleontological Resources

Under the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 3 would eliminate the Project's subterranean parking garage and underground stormwater capture and reuse system but would excavate for the gymnasium building's basement and pool. Excavation activities under both Alternative 3 and the Project would have the potential to encounter previously undiscovered paleontological resources. Should paleontological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of paleontological resources would be enforced. With implementation of the standard condition of approval, impacts to paleontological resources would be less than significant under Alternative 3 and the Project. However, because Alternative 3 would substantially reduce the extent of excavation activities due to the elimination of the Project's subterranean parking garage and underground stormwater capture and reuse system, impacts to paleontological resources would be less under Alternative 3 than under the Project.

(g) Greenhouse Gas Emissions

(i) Construction

Under the Project, as evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, and Alternative 3, hauling of exported excavated materials, concrete pours, deliveries, worker trips, and on-site construction equipment would result in GHG emissions. The Project would result in a net cut/fill volume of approximately 250,000 cubic yards (unadjusted), which would require a total of 17,857 trucks or 35,714 soil haul truck trips (to and from the Project Site). Alternative 3 would reduce the Project's soil export of 250,000 cubic yards to 90,100 cubic yards requiring 6,436 trucks or 12,872 truck trips, which is a reduction of 159,900 cubic yards (148,000 cubic yards + 11,900 cubic yards) or 11,421 trucks or 22,842 truck trips. Alterative 3 would also reduce the duration of the Project's construction activities from 30 to 19 months. Construction activities would comply with CARB's improved engine efficiency regulations and reduced idling times, as well as SCAQMD air quality control measures that reduce GHG emissions. Compliance with SCAQMD's CEQA Air Quality Handbook would ensure that GHG emissions would be consistent with applicable strategies outlined to reduce construction emissions.

However, because Alternative 3 would substantially reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 19 months compared to the Project, Alternative 3 would generate less GHG emissions during construction compared to the Project and for this reason impacts would be less under Alternative 3 than under the Project.

(ii) Operation

Operation of the Project, as evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, and Alternative 3 would generate increased GHG emissions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, Alternative 3 and the Project would not conflict with the regulations and policies and would comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Alternative 3 and the Project would also have a less-than-significant impact with respect to the urban heat island effect. Therefore, Alternative 3 and the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and project-specific impacts with regard to GHG emissions would be less than significant.

By eliminating the tennis courts, transportation-related GHG emissions would be incrementally reduced since students, spectators and the public traveling to/from the tennis courts would not occur under Alternative 3. For this reason, impacts would be less under Alternative 3 than under the Project.

(h) Hazards and Hazardous Materials

(i) Transport, Use, or Disposal of Hazardous Materials

(a) Construction

Construction of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, or Alternative 3 would involve the demolition and removal of numerous existing on-site improvements, including the tennis shack, tennis courts, court lighting, driving range features, golf course features, and paved areas. During the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions in accordance with BMPs contained in the required SWPPP. Due to the age of the clubhouse and tennis shack, which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements under either Alternative 3 or the Project would ensure that impacts associated with ACM, LBP, and PCB would be less than significant. Impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during demolition and construction under Alternative 3 and the Project would be less than significant and similar.

(b) Operation

The operation of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, or Alternative 3 would require the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, pesticides (for the putting green) and other household-type materials. The use of these materials would be in small quantities and in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements would reduce the potential to release contaminants. Alternative 3 and the Project would replace the golf course and other existing uses with new athletic and recreational facilities, including outdoor athletic fields utilizing artificial grass as a sustainable alternative to turf grass. The artificial turf would reduce the need to use pesticides as typically required to maintain grass playing fields. Further, no evidence or studies have demonstrated that health-related or hazardous materials impacts to the public or the environment would occur with use of artificial turf, including but not limited to inhalation risks. Therefore, impacts with respect to the transport, use, and disposal of hazardous material under either Alternative 3 or the Project would be less than significant and similar.

(ii) Accidental Release of Hazardous Materials

The Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 3 would require restoration of the clubhouse and demolition of the tennis shack. Due to the age of the clubhouse and tennis shack to be removed, which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant under both Alternative 3 and the Project.

Both Alternative 3 and the Project would require grading and excavation of the Project Site. The Project would result in a rough cut/fill volume of 251,836 cubic yards and export of 250,000 cubic yards; whereas Alternative 3 would result in the export of 90,100 cubic yards of material. Such grading activities could result in the exposure of construction workers to hazardous conditions associated with contaminated soils or soil vapor due to long-term use of pesticides to maintain the golf course and a previously removed UST. As such, either Alternative 3 or the Project could create a significant hazard to the public, and impacts would be potentially significant. Implementation of Mitigation Measures HAZ-MM-1 (SMP) and HAZ-MM-2 (HASP) would reduce potentially significant impacts to the public or the environment from the release of hazardous materials released during upset and/or accident conditions to a less than significant level under both Alternative 3 and the Project. However, because Alternative 3 would substantially reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for

accidental release of hazardous materials. As such, impacts would be less under Alternative 3 than under the Project.

(iii) Use of Hazardous Materials within One-Quarter Mile of a School

(a) Construction

The Project Site, as discussed in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, is not located within 0.25 mile of a school. The Project Site is within 1.6 miles of the LAUSD Millikan Middle School, 0.39 mile from Harvard-Westlake School, and 0.58 mile from Campbell Hall School. Construction of either Alternative 3 or the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With incorporation of Mitigation Measure AQ-MM-1, neither Alternative 3 nor the Project would expose any schools to substantial TAC concentrations and, with the incorporation of Mitigation Measure HAZ-MM-1, requirements for the handling, management and disposal of any contaminated soils or soil vapors would be established to prevent unacceptable exposure to contaminated soils or vapors at any nearby school. Because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials within one-quarter mile of a school under both Alternative 3 and the Project would be less than significant and similar.

(b) Operation

The Project Site is not located within 0.25 mile of a school. Operation of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 3 would use small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, and other household-type materials, which would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Both Alternative 3 and the Project would comply with applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous materials, and users are expected to adhere to manufacturer's instructions related to handling hazardous materials. With compliance to applicable regulatory requirements and because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials within one-quarter mile of a school under both Alternative 3 and the Project would be less than significant and similar.

(i) Hydrology and Water Quality

(i) Water Quality Standards and Groundwater Quality

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, Hydrology and Water Quality, of this Draft EIR, and Alternative 3, including earth moving, maintenance and operation of construction equipment, potential dewatering, and handling, storage, and disposal of materials, as well as erosion, could contribute to pollutant loading in stormwater runoff from the construction site. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events, and on-site watering activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 3 and the Project would comply with regulatory requirements, BMPs provided under the required SWPPP, and City Building Code grading procedures to ensure that pollutant loading would not exceed water quality standards. In addition, if contaminated soils are encountered, Mitigation Measure HAZ-MM-1 would be implemented by Alternative 3 or the Project which requires preparation of a SMP. Per the SMP, any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable screening levels would 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 construction workers, the environment, or the public to hazardous materials from contaminated soils. With implementation of Mitigation Measure HAZ-MM-1, potentially significant surface and groundwater quality impacts during construction from contaminated soils under both Alternative 3 and the Project would be reduced to a less-than-significant level. Therefore, impacts with respect to construction phase water quality standards under both the Project and Alternative 3 would be less than significant with the required mitigation measure. However, because Alternative 3 would substantially reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for pollutants to enter into surface water sources or groundwater. As such, impacts would be less under Alternative 3 than under the Project.

(b) Operation

Alternative 3 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site. LAMC Section 12.84 (LID regulations) requires that all new development, which would include Alternative 3, retain 100 percent of the SWQDv on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all SWQDv discharged from the site. By comparison, the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, would install a one-million-gallon underground stormwater capture, treatment, and reuse system, which would collect stormwater from the Project Site and a 39-acre off-site area located to the north of the Project Site. Under both the Project and Alternative 3, any captured and treated stormwater would be used for irrigation or water features on the Project Site (refer to

Project Design Feature WS-PDF-2), although less stormwater runoff would be available under Alternative 3. The treatment of discharge under both the Project and Alternative 3 would improve the quality of runoff, which currently flows directly into the Los Angeles River. However, improvements would be greater under the Project which also captures stormwater from an off-site area. Impacts under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would not collect and treat stormwater beyond that originating from the Project Site, impacts would be greater under Alternative 3 than under the Project.

(ii) Changes in Groundwater Supplies or Recharge

(a) Construction

During construction of the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, or Alternative 3, temporary dewatering during excavation may be required if groundwater is encountered. If required, pumps and filtration would be utilized in compliance with all applicable NPDES requirements for construction dewatering discharges. Any temporary construction dewatering would be minor and would not significantly contribute to depletion of groundwater supplies or interfere with recharge. As such, groundwater impacts would be less than significant under both Alternative 3 and the Project. However, because Alternative 3 would not excavate as deeply or extensively as the Project, it would be less likely to require dewatering. Thus, impacts to groundwater water supply and recharge would be less under Alternative 3 than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, the amount of impervious area on the Project Site would increase from the existing 30 percent to 59 percent upon buildout. Alternative 3 would eliminate the Project's tennis courts but add additional surface parking lots. Also, the area under Field A would be permeable, unlike under the Project where Field A would be above the subterranean parking garage. With these considerations, on balance, the extent of impervious area under the Project and Alternative 3 would be relatively similar. Alternative 3 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site, before releasing the water into the City's storm drain system. LAMC Section 12.84 requires that all new development, which would include Alternative 3, retain 100 percent of the SWQDv on site through one or a combination of infiltration, bioretention, evaporation or rainfall harvest. The LAMC also requires treatment of all SWQDv discharged from the site. The Project would capture, treat, and store up to one-million-gallons of stormwater at a time from the developed portions of the Project Site and 39-acre off-site drainage area through the stormwater capture and reuse system. Under both the Project and Alternative 3, any captured and treated stormwater would be used for irrigation or water features on the Project Site (refer to Project Design Feature WS-PDF-2), although less stormwater runoff would be available under Alternative 3.Impacts on the groundwater supply under both Alternative 3 and the Project would be less than

significant. However, because Alternative 3 would not include the Project's one-million-gallon stormwater capture and reuse system that would in part reuse water on the Project Site for landscaping, impacts would be greater under Alternative 3 than under the Project.

(iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 3 could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, both Alternative 3 and the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant under both Alternative 3 and the Project. While Alternative 3 would require substantially less excavation, on- and off-site drainage patterns during construction would be similar under Alternative 3 and the Project and, as such, impacts would be similar.

(b) Operation

Under the Project, the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, during the 50-year frequency design storm event peak flow rate, the peak flow rate of stormwater runoff from the Project Site would incrementally change from 60.93 cfs to 60.94 cfs (a 0.01 cfs or a 0.01 percent increase). This incremental change would not substantially alter the existing drainage pattern of the Project Site or surrounding area. The Project's stormwater capture and reuse system would serve to prevent on-site flooding and, at the same time, would ensure runoff discharged from the Project Site would not exceed the capacity of the municipal stormwater infrastructure during a larger storm event by capturing, storing and reusing stormwater on-site. Furthermore, through the stormwater capture and reuse system, the Project would address the localized flooding issue at the intersection of Valley Spring Lane and Whitsett Avenue, which regularly occurs during a rainfall event, as well as the stagnant water condition in the same area that frequently occurs even on dry days with the addition of a new curb inlet at the southwestern corner of Whitsett Avenue and Valley Spring Lane that would collect the stagnant water and convey it to the Project's capture and reuse system. By capturing, filtering, and reusing such stormwater, not only would at least one-third of the Project's annual landscape irrigation be satisfied, but vehicular and pedestrian safety would be improved by eliminating the localized flooding.

Alternative 3 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site, before releasing the water into the City's storm drain system. Through compliance with regulatory requirements, Alternative 3 would be required to ensure that no significant change or increase in off-site drainage volumes or patterns occur compared to existing conditions. Thus, with the implementation of stormwater collection and treatment systems under both Alternative 3 or the Project, neither would alter the Project Site's drainage patterns in a manner that would result in substantial erosion or exceedance of off-site storm drainage capacity or impede flood waters. Therefore, impacts related to drainage patterns under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would not address localized flooding issues as under the Project, impacts under Alternative 3 would be greater than under the Project.

(j) Land Use and Planning

Under the Project, as evaluated in Section IV.J, *Land Use and Planning*, and the land use tables in Appendix J of this Draft EIR, and Alternative 3, the existing land use and zoning designation would not change. As described in Section IV.J, neither Alternative 3 nor the Project would conflict with the policies of SCAG's 2020-2045 RTP/SCS, the General Plan Framework Element, Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the LARRMP, or the LAMC, which includes the RIO District Ordinance (Section 13.17 of the LAMC) adopted for the purpose of avoiding or mitigating an environmental effect. The development of either Alternative 3 or the Project would carry out certain objectives of applicable plans, such as reducing VMT consistent with the 2020-2045 RTP/SCS, and creation of publicly accessible open space and improved access to the Los Angeles River under the Community Plan, the LARRMP, and the RIO District Ordinance. Because Alternative 3 and the Project would entail the same uses and would not conflict with applicable land use plans and policies, land use impacts under both Alternative 3 and the Project would be less than significant and similar.

(k) Noise and Vibration

(i) Construction

The Project, as evaluated in Section IV.K, *Noise,* of this Draft EIR, and Alternative 3 would result in temporary noise levels caused primarily by heavy-duty machinery during construction would exceed the significance threshold at off-site noise receptors, including residential uses along Bellaire Avenue (receptor location R1, west of the Project Site), along Valley Spring Lane (receptor locations R2, R3 and R4, north of the Project Site), along Whitsett Avenue (receptor locations R5 and R6, east of the Project Site), and along Sunswept Drive (receptor location R7, south of the Project Site), prior to implementation of mitigation measures. In addition, construction noise impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp would be similar and significant at receptor location R8 under both the Project and Alternative 3. Alternative 3 and the Project would implement Mitigation Measures MM-NOI-1, MM-NOI-2 and MM-NOI-3, as applicable, to reduce noise levels in excess of ambient noise

standards. Even so, with implementation of all feasible mitigation measures, Alternative 3 and the Project's construction noise impacts would continue to exceed threshold levels at receptor locations R1, R2, R3 and R8. Therefore, both Alternative 3 and the Project would result in the generation of a temporary increase in ambient noise levels that would be significant and unavoidable. For construction activities within the Project Site, groundborne vibration impacts would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be than significant under Alternative 3 or the Project. However, vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp with respect to human annoyance would be similar and significant and unavoidable at receptor location R8 under both the Project and Alternative 3.

Alternative 3 would substantially reduce the Project's excavation volumes and the use of heavy excavation equipment, as well as the overall number of haul trucks entering and leaving the Project Site. Although Alternative 3 would reduce the duration of construction activity, it would not reduce maximum daily noise levels during peak construction activity. However, because Alternative 3 would reduce construction duration primarily due to less excavation and soil hauling, Project-level noise and vibration impacts would be less at receptor locations R1, R2 and R3 under Alternative 3 than under the Project. As stated above, noise and vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 3.

In addition, the Project's cumulative significant and unavoidable on-site construction equipment noise and off-site construction traffic noise would remain significant and unavoidable under Alternative 3, but would occur at a lesser extent under Alternative 3 than under the Project. Also, cumulative construction noise and vibration (human annoyance only) impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 3.

(ii) Operation

The Project, as evaluated in Section IV.K, *Noise*, of this Draft EIR, and Alternative 3 would generate noise from fixed mechanical equipment, athletic activities, special events, and parking facilities. Noise would also be generated form people talking along the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp. Off-site noise would occur in the form of traffic noise. Alternative 3 and the Project would implement Project Design Features NOI-PDF-1 and NOI-PDF-2. Project Design Feature NOI-PDF-1 would include sections of solid walls and an overhead canopy above the swimming pool that would reduce noise associated with the athletic activities to the adjacent residences. Per Project Design Feature NOI-PDF-2, the amplified sound system for special events (e.g., movies or educational speakers) at Field A would be designed to reduce off-site noise at the nearest off-site sensitive uses to the north and east of Field A.

Under Alternative 3, Field A would still be located on Whitsett Avenue in the eastern portion of the Project Site. With the elimination of the tennis courts and reconfiguration of the on-site recreational facilities and added surface parking, there would not be substantial change in composite noise levels as compared to the Project. Noise levels from the surface parking lots at nearby noise sensitive receptors would be similar to existing ambient noise levels. Alternative 3 would include the same off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp as the Project. Accordingly, as with the Project, composite noise levels associated with all noise sources under Alternative 3 would be below the 5-dBA CNEL significance threshold, and within acceptable standards established by the City. However, 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. As with the Project, operational groundborne vibration impacts under Alternative 3 would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be less than significant. Overall, any difference in composite noise levels between Alternative 3 and the Project would be negligible and likely not a perceptible difference at the off-site noise receptor locations. Thus, overall, operational noise and vibration impacts under Alternative 3 and the Project would be similar.

(l) Public Services

(i) Fire Protection

(a) Construction

The Project, as evaluated in Section IV.L.1, *Fire Protection,* of this Draft EIR, and Alternative 3 would involve construction activities that could affect fire protection and emergency medical services. Both Alternative 3 and the Project would implement Project Design Feature TRAF-PDF-1, to provide a Construction Management Plan to minimize impacts to vehicular and other forms of circulation during construction. Fire safety during construction would be further addressed by specific practices and procedures, including OSHA safety and health provisions, that would be implemented during construction. With the implementation of Project Design Feature TRAF-PDF-1 and compliance with applicable safety regulations, neither Alternative 3 nor the Project would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither Alternative 3 nor the Project would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would shorten the duration of Project construction activities from 30 months to 19 months, impacts would be less under Alternative 3 than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.1, *Fire Protection,* of this Draft EIR, and Alternative 3 would result in the occupation of and activity at the Project Site, which would require fire protection and emergency medical services. Both Alternative 3 and the Project would comply with applicable Fire Code regulations, including a sprinkler system within the gymnasium. Further, the Project Site is located in proximity to an LAFD Fire Station 78 and, as such, is located within the required fire station response distance established by the LAMC. The Project Site also has adequate proximity to fire hydrants and fire flow to meet LAMC standards. In addition, Alternative 3 and the Project would provide for emergency access into the Project Site and would not substantially interfere with emergency access in the surrounding neighborhood. Alternative 3 and the Project would also provide a system, inclusive of Project Design Feature TRAF-PDF-2 (flashing red warning light), to maintain adequate access for emergency vehicles to enter and return to the adjacent LAFD Fire Station 78 and, thus, would not interfere with the operation of that fire station. While Alternative 3 would eliminate the tennis courts and the corresponding use of the tennis courts, this feature of the Project would have a nominal effect on fire protection services and would not result in the need for the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility to maintain service. Overall, operation of either Alternative 3 or the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts to fire protection and emergency medical services during operation under Alternative 3 and the Project would be less than significant. Because Alternative 3 or the Project would not result in the provision of new or physically altered fire protection facilities, impacts would be similar under Alternative 3 and the Project.

(ii) Police Protection

(a) Construction

The Project, as evaluated in Section IV.L.2, *Police Protection,* of this Draft EIR, and Alternative 3 would result in construction activities that could affect emergency access and require police protection services. Both Alternative 3 and the Project would implement Project Design Feature TRAF-PDF-1, a City-reviewed Construction Management Plan, to ensure that emergency access would be maintained at the Project Site and in the vicinity of the Project Site during construction. Both Alternative 3 and the Project would implement Project Design Feature POL-PDF-1 to require construction fencing and security lighting to reduce the potential need for LAPD services. With the implementation of these features, neither Alternative 3 nor the Project would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither Alternative 3 nor the Project would result in potential physical impacts to

police facilities. Impacts under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would shorten the duration of Project construction from 30 months to 19 months, impacts under Alternative 3 would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.2, *Police Protection,* of this Draft EIR and Alternative 3 would result in the occupation of and activity at the Project Site, which would require police protection services. The operational demand for police protection services under either Alternative 3 or the Project would be largely offset as the result of the security services to be provided on the Project Site as part of Project Design Feature POL-PDF-2. Per Project Design Feature POL-PDF-2, Alternative 3 or Project would incorporate a security program to ensure the safety of students, employees, public users, and spectators. These include a variety of design features, such as the provision of three security kiosks, 24-hour on-site security, security lighting, and the installation and monitoring of CCTV cameras. Project Design Feature POL-PDF-2 also outlines the patrols that will be conducted on the Project Site by on-site security. While Alternative 3 would eliminate the tennis courts and the corresponding use of the tennis courts, this feature of the Project would have a nominal effect on police protection services and would not result in the need for the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility to maintain service. Overall, with implementation of Project Design Feature POL-PDF-2, impacts on police services under Alternative 3 and the Project would be less than significant. Because Alternative 3 or the Project would not result in the provision of new or physically altered police protection facilities, impacts would be similar under Alternative 3 and the Project.

(iii) Parks and Recreation

(a) Construction

The Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, and Alternative 3 would require closure of the Project Site's existing private recreational uses during construction. The closure would result in a minor impact on public parks since some existing users would likely use other public and private tennis and golf facilities in the region. However, even with any relocated golf and tennis users, the use of off-site recreational facilities and public parks is not expected to accelerate the deterioration of existing facilities that would require the need for new or physically altered parks and recreational facilities, the construction of which would cause significant environmental impacts. As such, the impact of Alternative 3 and the Project on parks and recreational facilities would be less than significant. However, because Alternative 3 would reduce the duration of construction and the period before on-site walking and jogging paths, tennis courts, and other recreational facilities would be available to the public, impacts under Alternative 3 would be less than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, and Alternative 3 , the Project Site's golf facilities would not continue in operation and tennis facilities would be completely eliminated under Alternative 3. This would result in the relocation of existing golf course and tennis court users to other facilities. Under both Alternative 3 and the Project, while the loss of the on-site golf facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically-altered public, nine-hole golf courses, in order for the RAP to maintain adequate service ratios. As discussed in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, there are 71 courts available to the public in the area serving the San Fernando Valley East Tennis League. Many of these are "first come-first served" with no fees, and other RAP courts require reservations and an hourly fee. The reservation websites for large tennis facilities in the area, such as the Sherman Oaks Tennis Center and the Balboa Tennis Center, indicate the availability of courts during a standard weekday.[6] Tennis facilities at North Hollywood Park and Studio City Recreation Center (Beeman Park) also indicated availability of courts during weekdays. Relocated tennis users could access these facilities, as well as other private tennis facilities in the region. Under Alternative 3, while the loss of the on-site tennis facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically altered public tennis facilities, in order for the RAP to maintain adequate service ratios.

In addition, the Project and Alternative 3 would provide public access to landscaped walking trails, direct access to the Zev Greenway, and public use of the community room in the gymnasium building in an area that lacks neighborhood park facilities. However, under Alternative 3, 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 by the Project. Other facilities, such as the multi-purpose athletic fields, swimming pool, and gymnasium would be available to the public with reservations. These features would reduce demand for off-site parks and recreation uses and meet the criterion of neighborhood park uses within walking distance of the surrounding neighborhood, as well as provide the highest priority recreational uses (walking paths) and high priority uses (gymnasium and swimming pool) identified in the RAP's Citywide Community Needs Assessment for the South San Fernando Valley geographic area. Therefore, Alternative 3 and the Project would not require the need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. Further, because the Project's recreational facilities are expected to draw visitors who currently use other existing park facilities in the area, the impact of Alternative 3 and the Project on public parks and recreational facilities is not expected to result in the accelerated deterioration of off-site recreational facilities. Impacts to public parks and recreational facilities during operation of Alternative 3 and the Project would be less than

[6] Websites for these uses were accessed on Thursday, February 11, 2021, during clear weather and temperatures of 64 degrees. Field check for available tennis courts at North Hollywood Park and Studio City Recreation Center was performed at 11:00 a.m. on the same day.

significant. However, because Alternative 3 would not provide tennis courts for public use and would reduce walking trails compared to the Project, impacts would be greater under Alternative 3 than under the Project.

(m) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

The Project, as evaluated in Section IV.M, *Transportation,* of this Draft EIR, Alternative 3 and the Project would support multimodal transportation options (shuttling) and a reduction in VMT associated with the existing Project Site (consistent with LADOT's methodology which excludes the Project's VMT components related to community use), as well as promote transportation-related safety in the Project area. Neither Alternative 3 nor the Project would conflict with policies of the Mobility Plan 2035 adopted to protect the environment and reduce VMT. Both Alternative 3 and the Project would be consistent with applicable transportation goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan to discourage non-residential traffic flow onto neighborhood streets and with the Community Plan and Los Angeles River Master Plan Landscaping Design Guidelines and Plant Palettes to increase accessibility to the Los Angeles River. Driveway design under both the Project and Alternative 3 would exceed the 30-foot maximum driveway width under MPP Section 321. The widths of the driveways would enhance safety by accommodating a median island to restrict turns into and out of the driveway (in the case of the northern driveway that would be located in proximity to the clubhouse) or serve as an extension of broader Valleyheart Drive (in the case of the southern driveway that would be located in proximity to LAFD Station 78). While the Project and Alternative 3 would not be consistent with the MPP Section 321 requirement, the inconsistency would not result in increased circulation, pedestrian or vehicular conflicts and, as such, would be less than significant. Neither Alternative 3 nor the Project would conflict with the Plan for a Healthy Los Angeles by providing for pedestrian and bicycle access. Because neither Alternative 3 nor the Project would conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, transportation impacts would be less than significant and similar.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The Project as evaluated in Section IV.M, *Transportation*, of this Draft EIR, would generate an estimated total daily VMT of 3,932 miles. When subtracting the Project's VMT from existing conditions (daily VMT of 6,030 miles), the Project would result in an estimated net decrease of 2,098 daily VMT compared to existing conditions. This reduction is consistent with LADOT's methodology which excludes the Project's VMT components related to community use. Under Alternative 3, the tennis courts would be

eliminated. As such, all trips and VMT associated with the tennis courts use (less than 10 percent of the Project's totals) would be deducted from the Project VMT, which would further reduce VMT as compared to existing conditions. Therefore, as Alternative 3 and the Project would result in a net decrease in daily VMT compared to existing conditions, impacts regarding VMT would be consistent with the LADOT's TAG related to trip reduction and, thus, would be consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would further reduce the Project's daily net VMT, impacts would be less under Alternative 3 than under the Project.

(iii) Geometric Design Hazards

Alternative 3 would provide two new driveways on both Valley Spring Lane and Whitsett Avenue to access the surface parking lots, for a total of four new driveways. Access to surface parking would also be available via Valleyheart Drive. By comparison, the Project, as evaluated in Section IV.M, *Transportation,* of this Draft EIR, would provide no driveways on Valley Spring Lane, one driveway on Whitsett Avenue, and access via Valleyheart Drive. The additional driveways required for Alternative 3 are needed to access the several parking lots required by the reconfiguration of recreational facilities. By comparison, the Project would provide a total of two driveways, one 39-foot-wide driveway on Whitsett Avenue, several hundred feet south of Valley Spring Lane, and a second driveway taking access on 33-foot-wide Valleyheart Drive just south of LAFD Fire Station 78. All proposed driveways, under Alternative 3 and the Project, would be appropriately set back from nearby street intersections. While driveways are not generally considered a roadway hazard absent some extenuating design flaw (such as vegetation blocking the line of sight of exiting vehicles), all driveways can present a potential for vehicular and pedestrian conflicts. With the implementation of appropriate setbacks of the parking lot-serving driveways from street intersections, neither Alternative 3 nor the Project is expected to significantly contribute to any roadway geometric design hazards. Impacts with respect to geometric design hazards under the Project and Alternative 3 would be less than significant. However, because Alternative 3 increases the Project's driveways and points of potential vehicular and pedestrian conflict, impacts would be greater under Alternative 3 than under the Project.

(iv) Emergency Access

(a) Construction

The Project, as evaluated in Section IV.M, *Transportation,* of this Draft EIR, and Alternative 3 would include temporary construction activities and generate construction vehicle trips that could potentially affect emergency access to the Project Site and surroundings. Alternative 3 would export 90,100 cubic yards of excavated materials, which would generate 13,472 truck trips. The Project would export 250,000 cubic yards of excavated materials, which would generate 35,714 haul truck trips. Potential congestion affecting emergency access under Alternative 3 or the Project would be

addressed through Project Design Feature TRAF-PDF-1, via implementation of a CMP. The CMP would provide designated haul routes, a staging plan, and programs to be reviewed by the LADOT, to ensure that access to neighborhood and collector streets in proximity to the Project Site remain unobstructed. Project Design Feature TRAF-PDF-1 also requires coordination with emergency service providers to ensure adequate emergency access. With implementation of the CMP, construction activities would not result in obstructed emergency access in the area. Therefore, emergency access impacts during construction, under both Alternative 3 and the Project would be less than significant. However, because Alternative 3 would reduce the duration of Project construction and construction truck vehicle trips, impacts would be less under Alternative 3 than under the Project.

(b) Operation

The Project Site, as evaluated in Section IV.M, *Transportation,* of this Draft EIR, is located in an established urban area served by a roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Project Design Feature TRAF-PDF-2, which requires a driveway warning signal, would prevent conflicts between Alternative 3 or the Project's vehicle traffic and fire emergency vehicles leaving from or arriving to LAFD Fire Station 78. On surrounding roadways, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or Alternative 3. Under both Alternative 3 and the Project, driveways would be subject to LAFD review to confirm that adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, neither Alternative 3 nor the Project would impair implementation of, or physically interfere with, adopted emergency response or emergency evacuation plans. Impacts with respect to emergency access under Alternative 3 and the Project would be less than significant and similar.

(n) Tribal Cultural Resources

Under the Project, as discussed in Section IV.N, *Tribal Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 3 would eliminate the Project's subterranean parking garage and stormwater capture and reuse system. Construction under Alternative 3 would include excavation to four feet for the Field A structure and similar excavation as the Project for the gymnasium building and pool. Excavation activities under both Alternative 3 and the Project would have the potential to encounter previously undiscovered tribal cultural resources. The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC indicated no known tribal cultural resources within the Project Site or surrounding area. However, in the event that tribal cultural resources are encountered during construction, the City's standard

condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, neither Alternative 3 nor the Project would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because Alternative 3 would substantially reduce the extent of excavation activities, impacts to tribal cultural resources would be less under Alternative 3 than under the Project.

(o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste

(i) Water Supply

(a) Construction

Construction activities associated with the Project, as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR, and Alternative 3 would require approximately 1,000 to 2,000 gpd of water for dust control and other construction activity. The intermittent construction-related water demand would be met by LADWP's available water supplies. As such, adequate water supplies would be available from existing entitlements and resources for construction activities. LADWP has sufficient water supplies to serve Alternative 3 and the Project into the reasonably foreseeable future during normal, dry, and multiple-dry years. Any construction relative to the water delivery system for Alternative 3 or the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. Therefore, Alternative 3 and the Project's impacts on water supply during construction would be less than significant. However, because Alternative 3 would reduce the duration and scale of earthwork, water required for construction activity would be less under Alternative 3 than under the Project.

(b) Operation

The Project, as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR, would increase on-site water demand to approximately 39,798 gpd (44.60 AFY). Deducting existing water use, the net increase would be 6,919 gpd (7.77 AFY). With the elimination of the tennis courts, there would be an incremental decrease in water demand as compared to the Project. There would also be an incremental increase in water demand associated with the increase in surface parking area under Alternative 3 as compared to the Project. As with the Project, Alternative 3 would implement Project Design Feature WS-PDF-1 regarding the use of artificial turf to reduce irrigation demand. However, Alternative 3 would not implement Project Design Feature WS-PDF-2 to use the Project's stormwater capture and reuse system to reuse captured

and treated stormwater for irrigation water. Depending on rainfall frequency and volume, a minimum of one-third (approximately 3.3 AFY) of the Project's total annual irrigation demand (approximately 10 AFY) is expected to be provided by the Project's one-million-gallon stormwater capture and reuse system. While Alternative 3 would have less landscaped area than the Project requiring less irrigation water, the minimum 3.3 AFY of reused stormwater would not be available under Alternative 3. Overall, the difference in water use associated with the combined tennis uses (or lack thereof) and parking between Alternative 3 and the Project would be minimal. On balance, the decrease in landscaping under Alternative 3 combined with the exclusion of the Project's underground capture and reuse system, would result in a relatively similar water demand required for irrigation purposes under Alternative 3 and the Project. The LADWP's water infrastructure and water supply are sufficient to meet demand and, as such, the impact of Alternative 3 and the Project related to the provision of water services would be less than significant. Based on the whole of the above, impacts related to water supply would be similar under Alternative 3 and the Project.

(ii) Wastewater

(a) Construction

Under the Project, as evaluated in Section IV.O.2, *Utilities and Service Systems - Wastewater,* of this Draft EIR, and Alternative 3, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Construction of Alternative 3 or the Project would include all necessary on- and off-site sewer pipe improvements and connections. If existing sewer lines are found to be substandard or deteriorated, the necessary improvements would be required to achieve adequate service under the City's Building and Safety Code and LADPW requirements. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. With the use of portable facilities during construction and implementation of any necessary upgrades, impacts to wastewater facilities under either Alternative 3 or the Project would be less than significant and similar.

(b) Operation

The Project, as evaluated in Section IV.O.2, *Utilities and Service Systems - Wastewater,* of this Draft EIR, is estimated to result in a maximum, worse-case wastewater generation of 527,574 gpd, or approximately 0.527 mgd. This demand takes into account the possible need for a full flush of the 52-meter pool concurrent with peak wastewater generation from every other source on the Project Site (although a full flush is a rare occurrence and may occur only a few times a year). Under Alternative 3, with the

elimination of the tennis courts, there would be an incremental decrease in wastewater generation. There would also be an incremental increase in wastewater generation associated with the increase in surface parking area under Alternative 3 as compared to the Project. On balance, the difference in wastewater generation associated with the combined tennis uses (or lack thereof) and parking between Alternative 3 and the Project would be minimal. Both Alternative 3 and the Project would reduce potential impacts to the local sewer system during operation with the implementation of Mitigation Measure WW-MM-1, to discharge the swimming pool at a rate of no more than 166,000 gallons per day and Mitigation Measure WW-MM-2 to 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. As such, Alternative 3 and the Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. However, with the required mitigation measures, impacts to wastewater facilities under both Alternative 3 and the Project would be less than significant. Based on the whole of the above, wastewater impacts under Alternative 3 and the Project would be similar.

(iii) Solid Waste

(a) Construction

The Project, as evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste,* of this Draft EIR, and Alternative 3 would result in the same volume of demolition debris. With the demolition of existing uses slated for removal, the Project would generate an estimated 397,493 tons (pre-diversion) and 99,373 net tons of C&D waste. Of this total, 375,000 tons is exported soil (250,000 cubic yards). Since Alternative 3 would reduce the Project's soil export of 250,000 cubic yards to 90,100 cubic yards, it would reduce the tonnage of exported soils from 375,000 to 135,100, or a reduction of 239,850 tons. Both Alternative 3 and Project C&D waste totals represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill, or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under either Alternative 3 or the Project would be less than significant. However, because Alternative 3 would result in less C&D waste, impacts would be less under Alternative 3 than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.O.3, *Utilities and Service Systems - Solid Waste,* of this Draft EIR, assuming a diversion rate of 65 percent, 63 tons (post-diversion) of solid waste per year would be generated. The Project's solid waste disposal would represent approximately 0.0006 percent of the County's remaining landfill capacity in 2025. Alternative 3 would eliminate the Project's tennis court uses and thus, would eliminate any solid waste generation from tennis court users. Accordingly, the Project's solid waste generation would be incrementally decreased under Alternative 3. Alternative 3 and the Project's additional solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. However,

because Alternative 3 would generate less solid waste, impacts would be less under Alternative 3 than under the Project.

(3) Relationship of the Alternative to Project Objectives

Alternative 3, the Reduced Density and Programming Alternative, would eliminate the Project's tennis courts; reconfigure the remaining gymnasium, Field B, and swimming pool on the Project Site; and provide all on-site parking in three surface parking lots. Alternative 3 would retain Field A and the clubhouse in similar locations as the Project. Alternative 3 would also eliminate the Project's subterranean garage and stormwater capture and reuse system, thus, reducing the excavation volumes needed to construct these facilities. As the underlying purpose of the Project is 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, Alternative 3 would be fully consistent with the following Project Objectives:

> **Objective 3:** Provide opportunities for academic use of the Project Site through science labs and outdoor classes, bird watching, water quality monitoring, and other non-athletic school activities.
>
> **Objective 6:** Implement a tree planting program that substantially increases the number of trees on the Project Site with native and RIO-compliant tree species, while removing invasive exotic and non-RIO compliant tree species.
>
> **Objective 7:** Promote compatibility with the surrounding neighborhood through a design that (1) includes mature trees and extensive landscaping along the northern edge of the Project Site; (2) reduces off-site noise effects through placement of recreational facilities internal to the Project Site, use of landscaped walls and berms, and use of canopy structures adjacent to pool and playfield areas; (3) limits light spillover and glare through use of field lights with light-emitting diode (LED) technology, timer controls, and shields that comply with LAMC and RIO requirements; (4) provides ample on-site parking and prohibits off-site parking; and (5) maximizes public safety through 24-hour, seven-day a week on-site security, monitored points of entry, and enforcement of a prohibition on off-site parking.
>
> **Objective 9:** Retain and rehabilitate the existing clubhouse with café, associated putting green, low brick retaining wall, and golf ball-shaped light standards for public use and leisure to convey their historic value as character defining features of the Historic-Cultural Monument, the Studio City Golf and Tennis Club (now Weddington Golf & Tennis), as a post-World War II recreational facility and as an important local example of Ranch style architecture.

Alternative 3 would eliminate the tennis courts and reduce open space to accommodate surface parking lots. Under Alternative 3, the 2-story gymnasium would be located immediately adjacent to the west of the clubhouse along Whitsett Avenue. In this location,

the gymnasium would represent a greater contrasting feature in the context of existing views (all at grade features) with the Project Site's character defining features from the public right-of-way as compared to the Project. Also, under Alternative 3, 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 by the Project. As a result, Alternative 3 would be substantially, but not entirely consistent the following Project Objectives:

> **Objective 1:** Develop a state-of-the-art indoor and outdoor athletic and recreational facility to support the School's existing athletic programs and co-curricular activities, including basketball, soccer, football, track and field, tennis, swim, water polo, volleyball, fencing, weight training, dance, yoga, physical fitness, and wrestling programs.
>
> **Objective 2:** Provide opportunities for shared use of a variety of types of recreational facilities and activities for the community.
>
> **Objective 4:** Create new publicly accessible open space with a broad array of recreational facilities in a safe and secure environment for the surrounding community and the public to use similar to a City-owned park, while also providing a community room, café, and indoor and outdoor areas for public gatherings, performances, and occasional special events.
>
> **Objective 5:** Increase public access to and enhance the adjacent Los Angeles River and Zev Greenway through a network of publicly accessible pathways, a new direct connection to the Zev Greenway, and a landscape plan that would restore native plant communities, create habitat for various species, and support the goals of the Los Angeles River Improvement Overlay District Ordinance, the Los Angeles River Revitalization Master Plan, and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.

Alternative 3 would eliminate the stormwater capture and reuse system, which would collect stormwater from the Project Site as well as a 39-acre, off-site drainage area to the north of the Project Site. As a result, Alternative 3 would only be partially consistent with the following objective:

> **Objective 8:** Incorporate sustainable and green building design through such features as a stormwater capture and on-site reuse system to improve water quality by treating runoff from the Project Site and adjacent areas that now flows directly to the Los Angeles River; a landscape plan featuring native and RIO-compliant plant species with low to medium water demand; elimination of turf and use of artificial grass to reduce water demand and use of pesticides; solar voltaic panels and energy efficient building design; electric vehicle charging stations; and bike facilities.

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

(1) Description of the 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 one-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.

Under the Project, to determine the average number of persons anticipated to access/use the Project Site per day, the total number of persons visiting the Project Site

during the calendar year was determined. The number of persons visiting consist of (1) 106,044 persons associated with Harvard-Westlake activities (based on 2018-2019 data); (2) 585,468 community users (based on standard trip generation rates for a recreational community center and tennis courts from the Institute of Transportation Engineers); (3) 19,500 persons associated with Harvard-Westlake special events (30/year); and (4) 2,500 persons associated with public events (5/year). The total of these four categories equals 713,512 persons per year, which divided by 365 days, equals 1,955 persons per day. Of these 1,955 persons per day, approximately 82 percent are associated with community/public use and 18 percent are associated with Harvard-Westlake activities/events. Thus, by eliminating public use of the Project Site, Alternative 4 would decrease the Project's average daily number of persons from 1,955 to 344 persons per day.

With elimination of the Project's one-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.

Alternative 4 would require similar entitlements requested for the Project, including a Vesting Conditional Use Permit to allow the operation of a private-school athletic and recreational campus in the A1 zone and allowance of light poles over 30 feet in height.

(2) Environmental Impacts

(a) Aesthetics/Visual Resources

(i) Light and Glare

(a) Construction

Under the Project, as evaluated in Section IV.A, *Aesthetics*, of this Draft EIR, and Alternative 4, construction would primarily take place during daylight hours in accordance with LAMC Section 41.40 requirements. Any construction lighting would be for security purposes only. During construction, all existing light sources, such as evening tennis lighting, would be discontinued and, as such, the Project Site would not be a meaningful source of light. Because of minimal lighting during the construction phase, impacts related to light and glare would be less than significant and similar under Alternative 4 and the Project.

(b) Operation

The Project, as evaluated in Section IV.A, *Aesthetics*, of this Draft EIR, and Alternative 4 would implement a similar lighting program for the athletic fields, pool, and tennis courts, security lighting for pathways and courtyards, and building lights for the gymnasium. Under both the Project and Alternative 4, the golf ball-shaped light standards would be

similarly relocated and fitted with optic control to reduce glare and the 128 existing, high-glare (500-watt flood lights) for the existing tennis courts would be removed. Alternative 4 and the Project's lighting program would not exceed LAMC light and glare standards, including RIO standards of maximum initial luminance value no greater than 0.20 horizontal and vertical foot candles at the Project Site boundary, and no greater than 0.01 horizontal foot candles 15 feet beyond the Project Site. Overall, the levels of on- and off-site light produced by Alterative 4 and the Project would be the same. However, since Alternative 4 would not include any public uses, nighttime lighting associated with public recreational use would not be needed and as such, lights would generally be off at the specific on-site recreational facilities when not in use by the School. During the operation phase, under both the Project and Alternative 4 impacts related to light and glare would be less than significant. However, because of the reduced daily duration of lighting under Alternative 4, impacts would be less under Alternative 4 than under the Project.

(b) Air Quality

(i) Consistency with Air Quality Management Plan

(a) Construction

During the construction phase, the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4 would comply with SCAQMD emissions control regulations and CARB requirements to minimize short-term emissions from on- and off-road diesel emissions. With implementation of Mitigation Measure AQ-MM-1, impacts related to the timely attainment of air quality standards or interim emission reductions specified in the AQMP would be reduced to below threshold levels. In addition, Alternative 4 and the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 AQMP is based. Since localized construction emissions would be less than significant without mitigation, and its regional construction emissions would be less than significant with implementation of the required mitigation measure, neither Alternative 4 nor the Project would obstruct implementation of the 2016 AQMP. Overall, potentially significant impacts related to the potential to conflict with or obstruct the implementation of the applicable air quality plan under Alternative 2 and the Project would be reduced to less than significant with implementation of Mitigation Measure AQ-MM-1. Because both Alternative 2 and the Project would similarly comply with the AQMP, impacts would be similar.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4 would provide a range of new recreational uses that would generate operational emissions. Alternative 4 would not allow public use of the Project Site, which would decrease activity and associated operational emissions compared to the Project. However, both Alternative 4 and the Project would be consistent with the AQMP in their incorporation of appropriate control strategies for emissions reduction during operation. Impacts with respect to AQMP consistency under Alternative 4 and the Project would be

less than significant. Because both Alternative 4 and the Project would similarly comply with the AQMP, impacts would be similar.

(ii) Cumulatively Considerable Increase in Criteria Pollutants

(a) Construction

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4's construction activities have the potential to generate temporary regional criteria pollutant emissions through the use of heavy-duty construction equipment that would potentially increase the frequency or severity of an existing violation. Construction of Alternative 4 or the Project could cause or contribute to new violations for exceedance of regional NO_X emissions. Construction emissions under the Project or Alternative 4 would not exceed the SCAQMD regional significance thresholds for VOCs, CO, SO2, PM10, and PM2.5. Implementation of Mitigation Measure AQ-MM-1 by the Project or Alternative 4, which would require machinery and vehicle emissions controls, would reduce short-term and temporary NO_X emissions, including emissions from haul trucks during the grading activities, to below the regional emission significance threshold. With this mitigation measure, Alternative 4 and the Project's impacts would be less than significant. However, while maximum daily emissions would be similar, because Alternative 4 would reduce the overall extent of excavation activities and the use of heavy-duty excavation equipment, haul truck trips, and overall construction duration from 30 months to 28 months compared to the Project, Alternative 4's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4 would provide recreational uses on the Project Site that would generate operational emissions. However, Alternative 4 would eliminate the public use of the Project Site. Alternative 4 would, therefore, reduce operational emissions associated with the public traveling to/from the tennis courts. Alternative 4 and the Project's mobile, stationary, and area source criteria pollutants emissions would not exceed the SCAQMD thresholds of significance. Regional operational emission impacts under Alternative 4 and the Project would be less than significant. However, because Alternative 4 would reduce operational trips, impacts would be less under Alternative 4 than under the Project.

(iii) Exposure of Sensitive Receptors to Pollutant Concentrations –Localized Emissions

(a) Construction

Construction activities under the Project, as discussed in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4 would generate localized emissions. Both Alternative 4 and the Project's maximum daily construction emissions would not exceed the SCAQMD

localized significance thresholds. As such, with this mitigation measure, localized construction emissions impacts to sensitive receptors under both Alternative 4 and the Project would be less than significant. However, while maximum daily emissions would be similar, because Alternative 4 would reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 28 months compared to the Project, Alternative 4's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4's daily emissions of NO_X, CO, PM10, and PM2.5 related to energy use and use of coatings, consumer products, and landscaping products would be substantially less than the SCAQMD's significance thresholds. As such, impacts under both Alternative 4 and the Project would be less than significant. With the elimination of public use under Alternative 4, energy demand related to lighting and maintenance would be incrementally reduced compared to the Project. Localized emissions under the Project related to energy use are less than 0.5 lbs per day. Thus, the difference in daily operational emissions between Alternative 4 and the Project would be less than 0.5 lbs per day. Accordingly, localized emissions impacts under Alternative 4 would be incrementally less than under the Project.

(iv) Carbon Monoxide Hotspots

The most heavily impacted intersection in the area with the potential to result in carbon monoxide hotspots is Coldwater Canyon Avenue at Ventura Boulevard. Analysis of this intersection provided in Section IV.B, *Air Quality*, of this Draft EIR demonstrated that, during operation, Project vehicle trips would not contribute to the formation of CO hotspots that would exceed threshold standards at this location. Impacts related to CO hotspots would be less than significant. Alternative 4 would have fewer overall construction trips compared to the Project due Alternative 4's reduction in excavation and shorter duration of the construction phase and operational trips would be fewer in number than the Project due to no public use. Because construction traffic would be less under Alternative 4 than under Project operation, which would be less than significant, impacts during construction of Alternative 4 would also be less than significant. Since Alternative 4 and the Project would not substantially contribute to the formation of CO hotspots, impacts related to CO hotspots would be less than significant under both the Project and Alternative 4. Because Alternative 4 would result in less construction and operational trips, impacts under Alternative 4 would be less than the Project.

(v) Toxic Air Contaminants

(a) Construction

Under the Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4, TAC emissions associated with DPM emissions from heavy construction equipment would occur during the construction phase. TACs are described in terms of

individual cancer risk based on a lifetime (i.e., 70-year) resident exposure duration. Given the temporary construction schedule (28 months under Alternative 4 and 30 months under the Project), construction of Alternative 4 and the Project would not result in a long-term exposure. Alternative 4 would reduce the Project's TACs with its reduction in excavation, reduction in the use of heavy-duty excavation equipment, and the reduction in haul trips for export of excavated materials. Under both the Project and Alternative 4, hazardous materials present in the existing on-site structures or infrastructure, such as asbestos-containing materials or lead based paint, would be similarly managed and disposed of in accordance with applicable laws and regulations. The nearest residential air quality sensitive receptors are located adjacent to the Project Site to the east, north and west. Based on the short-term duration of Alternative 4 and Project construction and compliance with regulations that would minimize emissions, such receptors would not be exposed to substantial TAC concentrations. Impacts related to TACs would be less than significant under both the Project and Alternative 4. However, while maximum daily emissions would be similar, because Alternative 4 would reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 28 months compared to the Project, Alternative 4's impacts would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.B, *Air Quality*, of this Draft EIR, and Alternative 4 would not include any heavy truck use during operation and would generate only minor amounts of diesel emissions from mobile sources that would not exceed the SCAQMD's project screening criteria of 100 trucks per day, and would have a less than significant impact relative to TAC emissions. Alternative 4 and the Project are expected to generate minimal emissions from sources such as consumer products and architectural coatings. Also, Alternative 4 or Project impacts related to the inhalation of vapors and particulates in the air space above an artificial turf field, ingestion of artificial turf products, and dermal contact with artificial turf products would be less than significant because evidence does not support a conclusion of a significant increase in health risks. Thus, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal, regulated, and controlled under both Alternative 4 and the Project, and would not be expected to exceed the SCAQMD significance threshold. Therefore, impacts under Alternative 4 and the Project would be less than significant and similar.

(c) Biological Resources

(i) Candidate, Sensitive, or Special Status Species

Development of the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 4 would result in the direct removal and replacement of a number of ornamental, non-native and, in some cases, invasive tree species and other

common ornamental plant species. No candidate, sensitive or special status plant species would be directly impacted by the construction of the Project or Alternative 4. Indirect impacts to special status plant species during construction and operation of the Project and Alternative 4 would be limited, if any, such that indirect impacts would be less than significant.

Common and non-indigenous wildlife species to be temporarily displaced during construction of the Project or Alternative 4, with the exception of a western yellow bat species (species of special concern), do not meet the significance threshold of candidate, sensitive, or special status wildlife species. Impacts on the western yellow bat during construction of the Project or Alternative 4 would be potentially significant and, as such, Mitigation Measure BIO-MM-1 would be implemented to provide for protection of the western yellow bat's roosting habitat. With this mitigation measure, the Project's or Alternative 4's impact on candidate, sensitive, or special status wildlife species during construction would be reduced to a level that is less than significant. Operation of the Project or Alternative 4 would result in no direct impacts to candidate, sensitive or special status wildlife species. During operation of the Project or Alternative 4, indirect impacts to special status bat species associated with a change in the on-site ambient lighting would be low and minimal operational lighting impacts would not diminish the chances for long-term survival of a special status bat species. Further, a change in the on-site operational noise levels and associated human activities would be low and would not diminish the chances for long-term survival or significantly impact special status bat species. Therefore, under both the Project and Alternative 4, operational indirect impacts to candidate, sensitive or special status wildlife species would be less than significant.

Overall, with mitigation, impacts on candidate, sensitive, or special status species under both the Project and Alternative 4 would be reduced to a level that is less than significant and impacts would be similar.

(ii) Riparian Habitat and Other Sensitive Communities

The off-site portion of the Biological Study Area along the Zev Greenway supports 0.88 acre of California brittlebush scrub, a sensitive natural community. The Zev Greenway connection trail, perimeter fencing, and River overlook under both the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 4 would impact 0.14 acres of recently restored California brittlebush scrub, which comprises 16 percent of the off-site sensitive natural community. Although impacts would be limited, direct impacts to this sensitive natural community would be potentially significant and, as such, Mitigation Measure BIO-MM-2 would be implemented under both Alternative 4 and the Project to replace removed brittlebush scrub on a 1:1 ratio. Therefore, with this mitigation measure, the Project and Alternative 4's impact on sensitive communities would be reduced to a level that is less than significant and impacts would be similar.

(iii) Movement of Wildlife or Nursery Sites

Under the Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 4, since the Biological Study Area does not function as a regional wildlife corridor and is not known to support wildlife nursery area(s). As such, no impacts would occur to regional movement. Although implementation of Alternative 4 and the Project would result in temporary disturbances to local wildlife movement within the Biological Study Area with the removal of landscape trees that may be used by birds and bats, those species are adapted to urban areas and would be expected to persist on-site following construction because a significant number of native replacement trees would be planted on-site and additional native shrub habitat would be planted that would provide habitat value not currently existing on-site by expanding the habitat, creating a greater native seed source, and providing a larger buffer from non-native ornamental landscaping in the surrounding developed areas. Therefore, Alternative 4 and Project impacts on the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors would be less than significant. Nonetheless, Alternative 4 or Project construction activities could potentially disturb songbird and raptor nests and significantly impact these biological resources. Project Design Feature PDF-BIO-1 would be implemented to demonstrate compliance with regulatory requirements for nesting bird protection, and Mitigation Measure BIO-MM-1 would be implemented to reduce any direct impacts to nesting birds and roosting bat species. Therefore, with these mitigation measures, impacts under Alternative 4 or the Project on nursery sites would be reduced to a level that is less than significant and impacts would be similar.

(iv) Conflict with Policies or Ordinances Protecting Biological Resources

The Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 4 would continue to provide recreational uses in the Biological Study Area, along with a significant native tree and shrub-planting program. Unlike the Project, under Alternative 4, no public access to these resources would be provided, nor would new public access pathways to the Zev Greenway be provided. However, both Alternative 4 and the Project would develop the Coldwater Canyon Avenue Riverwalk Path Ramp, which would facilitate public access to the Los Angeles River, consistent with the City's Open Space Element and the RIO District Ordinance. Alternative 4 and the Project's plant materials would consist entirely of native plants that have low to medium water demand, and landscape design includes the maintenance and planting of healthy trees that are consistent with the RIO District Ordinance and Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. The Project would include an underground stormwater capture and reuse system that would treat on-site stormwater as well as stormwater from a 39-acre residential area to the north, which would not be constructed under Alternative 4. Alternative 4 would comply with applicable LAMCLID regulations (LAMC Section 12.84), which require that all new development retain 100 percent of the SWQDv on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all

SWQDv discharged from the site. While Alternative 4 would comply with LID regulations, it would only capture and treat stormwater originating from within the Project Site. Both Alternative 4 and the Project would support improving the health of the City's watersheds, which is a goal of the RIO District Ordinance. Neither the Project nor Alternative 4 would conflict with City policies and ordinances protecting biological resources and, therefore, impacts would be less than significant. However, because Alternative 4 would not provide public access to Project Site's and adjacent biological resources and would implement policies to improve the health of the watershed to a lesser extent than the Project, impacts would be greater under Alternative 4 than under the Project.

(v) City-Protected and Non-Protected Significant Trees and Shrubs

The Project, as evaluated in Section IV.C, *Biological Resources*, of this Draft EIR, and Alternative 4 would require the replacement of a largely similar number of non-protected significant trees and City-protected public street trees. Alternative 4 and the Project would, therefore, result in a potentially significant impact related to City-protected and non-protected trees. Mitigation Measure BIO-MM-3 would be implemented to require replacement of all non-protected trees at a minimum 1:1 ratio and street trees at a ratio of typically 2:1. Alternative 4 and the Project would both meet this requirement. Therefore, with this mitigation measure, Alternative 4 and the Project's impact on City-protected trees and non-protected significant trees would be reduced to a level that is less than significant and impacts would be similar.

(d) Cultural Resources

(i) Historical Resources

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 4 would retain the recreational character of the Project Site, and would maintain 5.4 acres of open space. Both Alternative 4 and the Project would implement Project Design Feature CULT-PDF-1 to retain and provide 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. This includes retaining the clubhouse in its historic location, and maintaining the character-defining features of the Project Site, including the putting green, low brick retaining wall, clubhouse and relocating the golf ball-shaped light standards, which have been historically visible from the public right-of-way. Further, Project Design Features CUL-PDF-2 and CUL-PDF-3 would be implemented by Alternative 4 and the Project which require that the extant features of the Project Site are documented in a HABS survey and an interpretive exhibit displaying the history of the Project Site to be housed on the Project Site, respectively. With these Project Design Features in place, Alternative 4 and Project impacts on historic resources would be less than significant. The difference in walls and fencings between Alternative 4 and the Project would not be of such variance that findings related to indirect impacts or the setting

of the Project Site's clubhouse and the character-defining features would be materially different. Accordingly, impacts to historical resources under Alternative 4 would be less than significant and similar.

(ii) Archaeological Resources

Under the Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 4 would eliminate the Project's underground stormwater capture and reuse system, with maximum depths extending to 21 feet bgs as under the Project. Both Alternative 4 and the Project have the potential to encounter previously undiscovered subsurface archaeological resources. Should archaeological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, neither the Project nor Alternative 4 would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because Alternative 4 would reduce the extent of excavation activity due to elimination of the one-million-gallon underground stormwater capture and reuse system, impacts to archaeological resources would be less under Alternative 4 than under the Project.

(iii) Human Remains

The Project, as evaluated in Section IV.D, *Cultural Resources*, of this Draft EIR, and Alternative 4 would require grading, excavation, and other construction activities that have a potential to disturb previously undiscovered human remains. If any human remains are encountered, notification of the County Coroner and other entities per California Health and Safety Code Section 7050.5 would be required prior to resumption of construction activities. In addition, disposition of the human remains and any associated grave goods would be required to comply with PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e). With compliance with regulatory requirements, impacts under Alternative 4 and the Project related to human remains would be less than significant. However, because Alternative 4 would reduce the extent of excavation activities compared to the Project due to the elimination of the one-million-gallon stormwater capture and reuse system, impacts related to human remains would be less under Alternative 4 than under the Project.

(e) Energy

(i) Construction

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 4 are not expected to consume natural gas during construction, but would use electricity, as well as gasoline and diesel fuels associated with on- and off-road construction vehicles.

One aspect of the construction phase, the export of excavated materials, is expected to require 35,714 truck trips to haul 250,00 cubic yards of materials under the Project. This would be reduced under Alternative 4 to 34,014 truck trips to haul 238,100 cubic yards. Because Alternative 4 would shorten construction duration and hauling activity due to elimination of the one-million-gallon stormwater capture and reuse system, it would reduce the Project's overall demand for electricity and fuel. Construction would utilize energy only for necessary construction activities, and construction of Alternative 4 and the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. Demand for electricity, diesel, and gasoline would be within the handling capacity of suppliers. Because Alternative 4 and the Project would not result in an increase in demand for electricity and fuels that would exceed available supply or distribution infrastructure capabilities, they would not require the broad construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. As such, energy impacts under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would reduce the duration of excavation activities by two months of activity compared to the Project, therefore reducing the overall construction period, impacts would be less under Alternative 4 than under the Project.

(ii) Operation

The Project, as evaluated in Section IV.E, *Energy*, of this Draft EIR, and Alternative 4 would include development of new recreational features at the Project Site, which would generate new energy demand. The Project's annual average operational electricity usage would be approximately 2,617,043 kWh. Natural gas would be approximately 1,663,510 cubic feet. Transportation would result in an annual demand of 131,955 gallons of gasoline and 14,756 gallons of diesel. Alternative 4 would eliminate public use of the Project Site. With the elimination of public use, Alternative 4 would incrementally reduce the Project's electricity usage. Additionally, transportation gasoline and diesel usage would also be substantially reduced since the public traveling to/from the Project Site would not occur under Alternative 4. Operation of both Alternative 4 and the Project would comply with the CALGreen Code's energy saving measures. In addition, sustainability measures, such as a solar photo-voltaic array system and LED lighting, would be implemented to reduce energy demand under both Alternative 4 and the Project. Operation of Alternative 4 or the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy. As such, energy impacts under Alternative 4 and the Project would be less than significant. However, because Alternative 4 would reduce the Project's energy demand associated with the elimination of public use of the Project Site as described above, impacts would be less under Alternative 4 than under the Project.

(f) Geology and Soils

(i) Geologic Hazards

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 4 would implement engineering controls and comply with regulations for planned excavation and construction activities that would minimize any potential geologic hazards at the Project Site, including fault rupture, seismic shaking, liquefaction, or other geologic conditions. Therefore, development of Alternative 4 or the Project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury caused in whole or in part by the Project's exacerbation of existing environmental conditions. Impacts related to exacerbation of existing geologic conditions under both Alternative 4 and the Project would be less than significant and similar.

(ii) Soil Erosion or Loss of Topsoil

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 4 would require grading and excavation of soils, which would potentially increase erosion or loss of topsoil. By eliminating the Project's one-million-gallon stormwater capture and reuse system, Alternative 4 would reduce the Project's soil export of 250,000 cubic yards to 238,100 cubic yards, which is a reduction of 11,900 cubic yards. Construction activities under both Alternative 4 and the Project would be carried out pursuant to the 2019 CBC and the requirements of the NPDES General Construction Permit. Both Alternative 4 and the Project would be required to implement a SWPPP with incorporated BMPs to control soil erosion during the Project's construction period. With compliance with applicable LAMC and regulatory requirements, impacts associated with substantial erosion or loss of topsoil would be less than significant under both Alternative 4 and the Project. However, because Alternative 4 would reduce both the scale of excavation and the duration of construction activity compared to the Project, impacts would be less under Alternative 4 than under the Project.

(iii) Unstable Geologic Units

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 4 would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of either Alternative 4 or the Project, or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Under both Alternative 4 and the Project, all required excavations would be shored as required under the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. Further, as required by the City's Building Code, both Alternative 4 and the Project would adhere to a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements. With adherence to the recommendations of the Final Geotechnical Report and applicable Code (grading) requirements, impacts under Alternative 4 and the Project with respect to unstable geologic units would be less than significant and similar.

(iv) Expansive Soils

The Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, and Alternative 4 would comply with standard construction and engineering practices (e.g., onsite excavation requiring suitable engineered stabilization in accordance with the 2019 CBC and proper engineering erosion control and proper engineering drainage design). Both the Project and Alternative 4 would address expansive soils through City Building Code regulations pertinent to foundation stability to ensure that expansive soils or other unstable soils are removed, as necessary. Because both Alternative 4 and the Project would remove expansive soils, impacts with respect to expansive soils under both Alternative 4 and the Project would be less than significant and similar.

(v) Paleontological Resources

Under the Project, as evaluated in Section IV.F, *Geology and Soils*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Alternative 4 would eliminate the Project's one-million-gallon underground stormwater capture and reuse system. Excavation activities under both Alternative 4 and the Project would have the potential to encounter previously undiscovered paleontological resources. Should paleontological resources be encountered during construction, the City's standard condition of approval to address inadvertent discovery of paleontological resources would be enforced. With implementation of the standard condition of approval, impacts to paleontological resources would be less than significant under Alternative 4 and the Project. However, because Alternative 4 would reduce the extent of excavation activities, impacts to paleontological resources would be less under Alternative 4 than under the Project.

(g) Greenhouse Gas Emissions

(i) Construction

Under the Project, as evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, and Alternative 4, hauling of exported excavated materials, concrete pours, deliveries, worker trips, and on-site construction equipment would result in GHG emissions. The Project would result in a net cut/fill volume of approximately 250,000 cubic yards (unadjusted), which would require a total of 17,857 trucks or 35,714 soil haul truck trips (to and from the Project Site). Alternative 4 would reduce the Project's soil export of 250,000 cubic yards to 238,100 cubic yards, requiring 17,007 trucks or 34,014 truck trips, which is a reduction of 11,900 cubic yards (850 trucks or 1,700 truck trips). Alterative 4 would also reduce the duration of the Project's construction activities from 30 to 28 months. Construction activities would comply with CARB's improved engine efficiency regulations and reduced idling times, as well as SCAQMD air quality control measures that reduce GHG emissions. Compliance with SCAQMD's CEQA Air Quality Handbook would ensure that GHG emissions would be consistent with applicable strategies outlined

to reduce construction emissions. Greenhouse gas construction emissions would be less than significant.

However, because Alternative 4 would reduce the overall extent of excavation activity, the use of heavy-duty excavation equipment, haul truck activity, and the duration of construction activity from 30 months to 28 months compared to the Project, Alternative 4 would generate less construction GHG emissions and greenhouse gas emissions would be less than under the Project.

(ii) Operation

Operation of Project, as evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, and Alternative 4 would generate increased GHG emissions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, Alternative 4 and the Project would not conflict with the regulations and policies and would comply with or exceed the regulations and reduction actions/strategies outlined in the Climate Change Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. Alternative 4 and the Project would also have a less-than-significant impact with respect to the urban heat island effect. Therefore, Alternative 4 and the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to GHG emissions would be less than significant.

In addition, by eliminating public use of the Project Site, as described above, there would be a substantial reduction in the number of persons using the Project Site. By eliminating public use of the Project Site, Alternative 4 would decrease the Project's average daily number of persons from 1,955 to 344 persons per day, an 82 percent decrease compared to the Project. As such, transportation related GHG emissions would be substantially reduced compared to the Project since the public traveling to/from the Project Site would not occur under Alternative 4. For these reasons, impacts would be less under Alternative 4 than under the Project.

(h) Hazards and Hazardous Materials

(i) Transport, Use, or Disposal of Hazardous Materials

(a) Construction

Construction of the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, or Alternative 4 would involve the demolition and removal of existing numerous on-site improvements, including the tennis shack, tennis courts, court lighting, driving range features, golf course features, and paved areas. During the demolition and construction phase, construction equipment and materials may include fuels, oils and lubricants, solvents and cleaners, cements and adhesives, paints and thinners, degreasers, cement and concrete, and asphalt mixtures, which are all commonly

used in construction. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions in accordance with BMPs contained in the required SWPPP. Due to the age of the clubhouse and tennis shack, which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements under either Alternative 4 or the Project would ensure that impacts associated with ACM, LBP, and PCB would be less than significant. Impacts related to the routine transport, use, disposal, or accidental release of hazardous materials during demolition and construction under Alternative 4 and the Project would be less than significant and similar.

(b) Operation

The operation the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 4 would require the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, pesticides (for the putting green) and other household-type materials. The use of these materials would be in small quantities and in accordance with the manufacturers' specifications for use, storage, and disposal of such products which have been formulated to avoid substantial exposure hazards. Compliance with applicable federal, State, and local requirements would reduce the potential to release contaminants. Alternative 4 and the Project would replace the golf course and other existing uses with new athletic and recreational facilities, including outdoor athletic fields utilizing artificial grass as a sustainable alternative to turf grass. The artificial turf would reduce the need to use pesticides as typically required to maintain grass playing fields. Further, no evidence or studies have demonstrated that health-related or hazardous materials impacts to the public or the environment would occur with use of artificial turf, including but not limited to inhalation risks. Therefore, impacts with respect to the transport, use, and disposal of hazardous material under either Alternative 4 or the Project would be less than significant and similar.

(ii) Accidental Release of Hazardous Materials

As evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, due to the age of the clubhouse and the tennis shack (to be removed), which were constructed in 1955-1956 prior to the ban on ACM (banned in 1989), LBP (banned in 1978), and PCBs (banned in 1979), these hazardous materials may be present on-site. Because the handling, transport and disposal of ACM, LBP, and PCB are highly regulated, compliance with applicable regulatory requirements would ensure that impacts associated with ACM, LBP, and PCB would be less than significant under both Alternative 4 and the Project.

Both Alternative 4 and the Project would require grading and excavation of the Project Site. The Project would result in a rough cut/fill volume of 251,836 cubic yards and export of 250,000 cubic yards; whereas Alternative 4 would result in the export of 238,000 cubic yards of material. Such grading activities could result in the exposure of construction

workers to hazardous conditions associated with contaminated soils or soil vapor due to long-term use of pesticides to maintain the golf course and a previously removed UST. As such, either Alternative 4 or the Project could create a significant hazard to the public, and impacts would be potentially significant. Implementation of Mitigation Measures HAZ-MM-1 (SMP) and HAZ-MM-2 (HASP) would reduce potentially significant impacts to the public or the environment from the release of hazardous materials released during upset and/or accident conditions to a less than significant level under both Alternative 4 and the Project. However, because Alternative 4 would reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for accidental release of hazardous materials. As such, impacts would be less under Alternative 4 than under the Project.

(iii) Use of Hazardous Materials within One-Quarter Mile of a School

(a) Construction

The Project Site, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, is not located within 0.25 mile of a school. The Project Site is within 1.6 miles of the LAUSD Millikan Middle School, 0.39 mile from Harvard-Westlake School, and 0.58 mile from Campbell Hall School. Construction of either Alternative 4 or the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With incorporation of Mitigation Measure AQ-MM-1, neither Alternative 4 nor the Project would expose any schools to substantial TAC concentrations and, with the incorporation of Mitigation Measure HAZ-MM-1, requirements for the handling, management and disposal of any contaminated soils or soil vapors would be established to prevent unacceptable exposure to contaminated soils or vapors at any nearby school. Because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials within one-quarter mile of a school under both Alternative 4 and the Project would be less than significant and similar.

(b) Operation

The Project Site is not located within 0.25 mile of a school. The operation the Project, as evaluated in Section IV.H, *Hazards and Hazardous Materials*, of this Draft EIR, and Alternative 4 would use small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pool supplies, and other household-type materials, which would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Both Alternative 4 and the Project would comply with applicable federal, State, and local laws and regulations relating to environmental protection and the management of hazardous

materials, and users are expected to adhere to manufacturer's instructions related to hazardous materials. With compliance to applicable regulatory requirements and because there would be no unacceptable exposure to hazardous materials at any school location, impacts related to the use of hazardous materials within one-quarter mile of a school under both Alternative 4 and the Project would be less than significant and similar.

(i) Hydrology and Water Quality

(i) Water Quality Standards and Groundwater Quality

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 4, including earth moving, maintenance and operation of construction equipment, potential dewatering, and handling, storage, and disposal of materials, as well as erosion, could contribute to pollutant loading in stormwater runoff from the construction site. Also, exposed and stockpiled soils could be subject to wind and conveyance into nearby storm drains during storm events, and on-site watering activities for dust suppression purposes could contribute to pollutant loading in runoff from the construction site. Alternative 4 and the Project would comply with regulatory requirements, BMPs provided under the required SWPPP, and City Building Code grading procedures to ensure that pollutant loading would not exceed water quality standards. In addition, if contaminated soils are encountered, Mitigation Measure HAZ-MM-1 would be implemented by Alternative 4 or the Project which requires preparation of a SMP. Per the SMP, any soils qualifying as hazardous waste and/or soils that include concentrations of chemicals that exceed applicable screening levels would 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 construction workers, the environment, or the public to hazardous materials from contaminated soils. With implementation of Mitigation Measure HAZ-MM-1, potentially significant surface and groundwater quality impacts during construction from contaminated soils under both Alternative 4 and the Project would be reduced to a less-than-significant level. Therefore, impacts with respect to construction phase water quality standards under both the Project and Alternative 4 would be less than significant with the required mitigation measure. However, because Alternative 4 would reduce the quantity of excavated and stockpiled materials to be hauled away, there would be less potential for pollutants to enter into surface water sources or groundwater. As such, impacts would be less under Alternative 4 than under the Project.

(b) Operation

Alternative 4 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site. LAMC Section 12.84 (LID regulations) requires that all new development, which would include Alternative 4, retain 100 percent of the SWQDv on site through one or a combination of infiltration, bioretention, evaporation or rainfall harvest measures. The LAMC also requires treatment of all

SWQDv discharged from the site. By comparison, the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, would install a one-million-gallon underground stormwater capture, treatment, and reuse system, which would collect stormwater from the Project Site and a 39-acre off-site area located to the north of the Project Site. Under both the Project and Alternative 4, any captured and treated stormwater would be used for irrigation or water features on the Project Site (refer to Project Design Feature WS-PDF-2), although less stormwater runoff would be available under Alternative 3. The treatment of discharge under both the Project and Alternative 4 would improve the quality of runoff, which currently flows directly into the Los Angeles River. However, improvements would be greater under the Project which also captures stormwater from an off-site area. Impacts under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would not collect and treat stormwater originating beyond the Project Site, impacts would be greater under Alternative 4 than under the Project.

(ii) Changes in Groundwater Supplies or Recharge

(a) Construction

During construction of the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, or Alternative 4, temporary dewatering during construction could be required if groundwater is encountered. If required, pumps and filtration would be utilized in compliance with all applicable NPDES requirements for construction dewatering discharges. Any temporary construction dewatering would be minor and not significantly contribute to a substantial depletion of groundwater supplies or interfere with recharge and, as such, impacts would be less than significant under both Alternative 4 and the Project. However, because Alternative 4 would involve less overall excavation compared to the Project, potential dewatering would be reduced under Alternative 4. Thus, impacts to groundwater water supply and recharge would be less under Alternative 4 than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 4, the amount of impervious area on the Project Site would increase from the existing 30 percent to 59 percent upon buildout. Alternative 4 would comply with applicable LAMC LID regulations to capture and treat stormwater originating from the Project Site, before releasing the water into the City's storm drain system. LAMC Section 12.84 (LID regulations) requires that all new development, which would include Alternative 4, retain 100 percent of the SWQDv on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all SWQDv discharged from the site. By comparison, the Project would capture, treat, and store up to one-million-gallons of stormwater at a time from the developed portions of the Project Site and a 39-acre off-site area through the stormwater capture and reuse system. Under both the Project and Alternative 4, any captured and treated stormwater would be used for irrigation or water features on the

Project Site (refer to Project Design Feature WS-PDF-2), although less stormwater runoff would be available under Alternative 4. Impacts on the groundwater supply under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would not include the Project's one-million-gallon stormwater capture and reuse system that would in part reuse water on the Project Site for landscaping, impacts would be greater under Alternative 4 than under the Project.

(iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows

(a) Construction

Construction activities under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, and Alternative 4 could contribute to erosion or siltation when soils are exposed. Construction activities have the potential to temporarily alter existing drainage patterns and flows within the Project Site by altering topography, exposing the underlying soils, and increasing permeability. However, both Alternative 4 and the Project would be required to implement BMPs and erosion control measures as part of a SWPPP to manage runoff flows. With implementation of construction BMPs as part of a SWPPP and compliance to applicable regulatory requirements, impacts related to drainage pattern changes resulting in erosion, siltation, or runoff water that would exceed the capacity of existing or planned stormwater drainage systems or block or redirect the flow of flood water would be less than significant under both Alternative 4 and the Project. While Alternative 4 would require less excavation, on- and off-site drainage patterns during construction would be similar under Alternative 4 and the Project and, as such, impacts would be similar.

(b) Operation

Under the Project, as evaluated in Section IV.I, *Hydrology and Water Quality*, of this Draft EIR, during the 50-year frequency design storm event peak flow rate, the peak flow rate of stormwater runoff from the Project Site would incrementally change from 60.93 cfs to 60.94 cfs (a 0.01 cfs or a 0.01 percent increase). This incremental change would not substantially alter the existing drainage pattern of the Project Site or surrounding area. The Project's stormwater capture and reuse system would serve to prevent on-site flooding and, at the same time, would ensure runoff discharged from the Project Site would not exceed the capacity of the municipal stormwater infrastructure during a larger storm event by capturing, storing and reusing stormwater on-site. Furthermore, through the stormwater capture and reuse system, the Project would address the localized flooding issue at the intersection of Valley Spring Lane and Whitsett Avenue, which regularly occurs during a rainfall event, as well as the stagnant water condition in the same area that frequently occurs even on dry days with the addition of a new curb inlet at the southwestern corner of Whitsett Avenue and Valley Spring Lane that would collect the stagnant water and convey it to the Project's capture and reuse system. By capturing,

filtering, and reusing such stormwater, not only would at least one-third of the Project's annual landscape irrigation be satisfied, but vehicular and pedestrian safety would be improved by eliminating the localized flooding**.**

Alternative 4 would comply with applicable LAMC LID regulations (LAMC Section 12.84), which require that all new development retain 100 percent SWQDv on site through one or a combination of the following measures: infiltration, bioretention, evaporation, or rainfall harvest. The LAMC also requires treatment of all SWQDv before releasing the water into the City's storm drain system. Through compliance with regulatory requirements, Alternative 4 would be required to ensure that no significant change or increase in off-site drainage volumes or patterns occur compared to existing conditions. Thus, with the implementation of stormwater collection and treatment systems under both Alternative 4 or the Project, neither would alter the Project Site's drainage patterns in a manner that would result in substantial erosion or exceedance of off-site storm drainage capacity or impede flood waters. Therefore, impacts related to drainage patterns under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would not address localized flooding issues as under the Project, impacts under Alternative 4 would be greater than under the Project.

(j) Land Use and Planning

Under the Project, as evaluated in Section IV.J, *Land Use and Planning*, and the Land Use tables in Appendix J of this Draft EIR, and Alternative 4, the existing land use and zoning designation would not change. Neither Alternative 4 nor the Project would conflict with the policies of SCAG's 2020-2045 RTP/SCS, the City of Los Angeles General Plan Framework Element, the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, the LARRMP, or the LAMC, which includes the RIO District Ordinance (Section 13.17 of the LAMC) adopted for the purpose of avoiding or mitigating an environmental effect. Impacts of Alternative 4 and the Project with respect to conflicts with land use plans and policies would be less than significant. While development of either Alternative 4 or the Project would carry out certain objectives of applicable plans, such as reducing VMT, consistent with the 2020-2045 RTP/SCS, Alternative 4 would not provide publicly accessible open space or improved public access to the Los Angeles River through the Project Site. Thus, Alternative 4 would be consistent with such applicable policies in the Community Plan, LARRMP, and RIO District Ordinance to a lesser extent than the Project and, as such, impacts would be greater under Alternative 4 than under the Project.

(k) Noise and Vibration

(i) Construction

Under the Project, as evaluated in Section IV.K, *Noise*, of this Draft EIR, and Alternative 4, the temporary noise levels resulting primarily from heavy-duty machinery during construction would exceed the significance threshold at off-site noise receptors, including residential uses along Bellaire Avenue (receptor location R1, west of the Project Site),

along Valley Spring Lane (receptor locations R2, R3 and R4, north of the Project Site), along Whitsett Avenue (receptor locations R5 and R6, east of the Project Site), and along Sunswept Drive (receptor location R7, south of the Project Site), prior to implementation of mitigation measures. In addition, construction noise impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp would be similar and significant at receptor location R8 under both the Project and Alternative 4. Alternative 4 and the Project would implement Mitigation Measures MM-NOI-1, MM-NOI-2 and MM-NOI-3, as applicable, to reduce noise levels in excess of ambient noise standards. Even so, with implementation of all feasible mitigation measures, Alternative 4 and the Project's construction noise impacts would continue to exceed threshold levels at receptor locations R1, R2, R3 and R8. Therefore, both Alternative 4 and the Project would result in the generation of a temporary increase in ambient noise levels that would be significant and unavoidable. For construction activities within the Project Site, groundborne vibration impacts would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be less than significant and similar under Alternative 4 or the Project. However, vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp with respect to human annoyance would be similar and significant and unavoidable at receptor location R8 under both the Project and Alternative 4.

Alternative 4 would reduce the Project's excavation volumes and the use of heavy excavation equipment, as well as the overall number of haul trucks entering and leaving the Project Site. Although Alternative 4 would reduce the duration of construction activity, it would not reduce maximum daily noise levels during peak construction activity. However, because Alternative 4 would reduce construction duration primarily due to less excavation and soil hauling, Project-level noise and vibration impacts would be less at receptor locations R1, R2 and R3 under Alternative 4 than under the Project. As stated above, noise and vibration impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 4.

In addition, the Project's cumulative significant and unavoidable on-site construction equipment noise and off-site construction traffic noise would remain significant and unavoidable under Alternative 4, but would occur at a lesser extent under Alternative 4 than under the Project. Also, cumulative construction noise and vibration (human annoyance only) impacts from construction activities associated with the Coldwater Canyon Avenue Riverwalk Path Ramp at receptor location R8 would be similar and significant and unavoidable under the Project and Alternative 4.

(ii) Operation

The Project, as evaluated in Section IV.K, *Noise*, of this Draft EIR, and Alternative 4 would both generate noise from fixed mechanical equipment, athletic activities, special events, and parking facilities. Noise would also be generated form people talking along the off-site improvements at the Coldwater Canyon Avenue Riverwalk Path Ramp. Off-site noise

would occur in the form of traffic noise. Alternative 4 would eliminate public use of the Project Site, which would represent approximately 82 percent of the Project's total average daily occupancy. 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). In addition, Alternative 4 would result in no public use and limited School use on Saturdays and no use of the Project Site by the public or the School on Sundays. These reductions would reduce daily noise activity and traffic noise associated with public users who drive under the Project. However, maximum vibration and composite noise levels created by all on-site and off-site individual noise sources associated with maximum daily operation of the Project (mechanical equipment, athletic activities, parking, special events and traffic) would be similar to the Project. Both Alternative 4 and the Project would implement Project Design Features NOI-PDF-1 and NOI-PDF-2. Project Design Feature NOI-PDF-1 would include sections of solid walls and an overhead canopy above the swimming pool that would reduce noise associated with the athletic activities to the adjacent residences. Per Project Design Feature NOI-PDF-2, the amplified sound system for special events at Field A would be designed to reduce off-site noise at the nearest off-site sensitive uses to the north and east of Field A. As with the Project, composite noise levels associated with all noise sources under Alternative 4 would be below the 5-dBA CNEL significance threshold, and within acceptable standards established by the City. As with the Project, operational groundborne vibration impacts under Alternative 4 would not exceed threshold levels, or result in excessive human annoyance, or structure damage and, therefore, impacts would be less than significant. However, because Alternative 4 would reduce the overall occupancy of the Project Site and the hours of operation, and would eliminate public special events, impacts would be less under Alternative 4 than under the Project.

(l) Public Services

(i) Fire Protection

(a) Construction

The Project, as evaluated in Section IV.L.1, *Fire Protection,* of this Draft EIR, and Alternative 4 would involve construction activities that could affect fire protection and emergency medical services. Both Alternative 4 and the Project would implement Project Design Feature TRAF-PDF-1, to provide a Construction Management Plan to minimize impacts to vehicular and other forms of circulation during construction. Fire safety during construction would be further addressed by specific practices and procedures, including OSHA safety and health provisions, that would be implemented during construction. With the implementation of Project Design Feature TRAF-PDF-1 and compliance with applicable safety regulations, neither Alternative 4 nor the Project would increase fire services demand to the extent that the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service.

As such, neither Alternative 4 nor the Project would result in potential physical impacts associated with construction of fire facilities. Therefore, impacts with respect to fire protection under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would shorten the duration of Project construction activities from 30 months to 28 months, impacts under Alternative 4 would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.1, *Fire Protection,* of this Draft EIR, and Alternative 4 would result in the occupation of and activity at the Project Site, which would require fire protection and emergency medical services. Both Alternative 4 and the Project would comply with all applicable Fire Code regulations, including a sprinkler system within the gymnasium. Further, the Project Site is located in proximity to LAFD Fire Station 78 and, as such, is located within the required fire station response distance established by the LAMC. The Project Site also has adequate proximity to fire hydrants and fire flow to meet LAMC standards. In addition, Alternative 4 and the Project would provide for emergency access into the Project Site and would not substantially interfere with emergency access in the surrounding neighborhood. Alternative 4 and the Project would also provide a system, inclusive of Project Design Feature TRAF-PDF-2 (flashing red warning light), to maintain adequate access for emergency vehicles to enter and return to the adjacent LAFD Fire Station 78 and, thus, would not interfere with the operation of that fire station. Overall, operation of either Alternative 4 or the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts to fire protection and emergency medical services during operation under Alternative 4 and the Project would be less than significant. While neither Alternative 4 nor the Project would result in the need for the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, Alternative 4 would eliminate public use of the Project Site, which would represent approximately 82 percent of the Project's total average daily occupancy. 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). In addition, Alternative 4 would result in no public use and limited School use on Saturdays and no use of the Project Site by the public or the School on Sundays. The elimination of public use of the Project Site during weekdays and weekends, and the reduced use of the Project Site by the School on weekdays (as compared to current conditions) and limited use of the Project Site by the School on weekends would reduce demand for fire protection services at the Project Site and would reduce traffic, thus, facilitating fire equipment access on surrounding streets. As such, impacts to fire protection services are considered less under Alternative 4 than under the Project.

(ii) Police Protection

(a) Construction

The Project, as evaluated in Section IV.L.2, *Police Protection,* of this Draft EIR, and Alternative 4 would result in construction activities that could affect emergency access and require police protection services. Both Alternative 4 and the Project would implement Project Design Feature TRAF-PDF-1, a City-reviewed Construction Management Plan, to ensure that emergency access would be maintained in the vicinity of the Project Site during construction. Both Alternative 4 and the Project would implement Project Design Feature POL-PDF-1 to require construction fencing and security lighting to reduce the potential need for LAPD services. With the implementation of these features, neither Alternative 4 nor the Project would increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, neither Alternative 4 nor the Project would result in potential physical impacts to police facilities. Impacts under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would shorten the duration of Project construction from 30 months to 28 months, the impacts under Alternative 4 would be less than under the Project.

(b) Operation

The Project, as evaluated in Section IV.L.2, *Police Protection,* of this Draft EIR, and Alternative 4 would result in the occupation of and activity at the Project Site, which would require police protection services. The operational demand for police protection services under either Alternative 4 or the Project would be largely offset as the result of the security services to be provided on the Project Site as part of Project Design Feature POL-PDF-2. Per Project Design Feature POL-PDF-2, Alternative 4 or the Project would incorporate a security program to ensure the safety of students, employees, public users, and spectators. These include a variety of design features, such as the provision of three security kiosks, 24-hour on-site security, security lighting, and the installation and monitoring of CCTV cameras. Project Design Feature POL-PDF-2 also outlines the patrols that will be conducted on the Project Site by on-site security. With implementation of Project Design Feature POL-PDF-2, impacts on police services under the Project and Alternative 4 would be less than significant. While neither Alternative 4 nor the Project would result in the need for the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, Alternative 4 would eliminate public use of the Project Site, which would represent approximately 82 percent of the Project's total average daily occupancy. 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). In addition, Alternative 4 would result in no public use and limited School use on Saturdays and no use of the Project Site by the public or the School on Sundays. The elimination of public use of the Project Site during weekdays and weekends, and the

reduced use of the Project Site by the School on weekdays (as compared to current conditions) and limited use of the Project Site by the School on weekends would reduce demand for police protection services at the Project Site and would reduce traffic, thus, facilitating police access to surrounding neighborhoods. As such, impacts to police protection services are considered less under Alternative 4 than under the Project.

(iii) Parks and Recreation

(a) Construction

Under the Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, or Alternative 4, the Project Site's existing private recreational uses would be closed during construction. The closure would result in a minor impact on public parks since some existing users would likely use other private tennis and golf facilities in the region. However, even with any relocated golf and tennis users, the use of off-site recreational facilities and public parks is not expected to accelerate the deterioration of existing facilities that would require the need for new or physically-altered parks and recreational facilities, the construction of which would cause significant environmental impacts. As such, the impact of Alternative 4 and the Project on parks and recreational facilities would be less than significant. However, because Alternative 4 would reduce the duration of construction and the period before on-site walking and jogging paths, tennis courts, and other recreational facilities would be available to the public, impacts under Alternative 4 would be less than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, or Alternative 4, the Project Site's golf facilities would not continue in operation. The Project would make eight tennis courts available for public use, though public use of those courts would be eliminated under Alternative 4. Therefore, Alternative 4 would result in the relocation of existing golf course and tennis court users to other facilities. Under both Alternative 4 and the Project, while the loss of the on-site golf facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically altered public, nine-hole golf courses, in order for the RAP to maintain adequate service ratios. As discussed in Section IV.L.3, *Parks and Recreation*, of this Draft EIR, there are 71 tennis courts available to the public in the area serving the San Fernando Valley East Tennis League. Many of these are "first come-first served" with no fees, and other RAP courts require reservations and an hourly fee. The reservation websites for large tennis facilities in the area, such as the Sherman Oaks Tennis Center and the Balboa Tennis Center, indicate the availability of courts during a standard weekday.[7] Tennis facilities at North Hollywood Park and Studio City Recreation Center (Beeman Park) also indicated availability of

[7] Websites for these uses were accessed on Thursday, February 11, 2021, during clear weather and temperatures of 64 degrees. Field check for available tennis courts at North Hollywood Park and Studio City Recreation Center was performed at 11:00 a.m. on the same day.

courts during weekdays. Relocated tennis users could access these facilities, as well as other private tennis facilities in the region. Under Alternative 4, while the loss of the on-site tennis facilities would pose an inconvenience for current users, the increased demand for use of other facilities is not expected to foreseeably result in the need for new or physically altered public tennis facilities, in order for the RAP to maintain adequate service ratios.

In addition, Alternative 4 would not provide public access to any of the Project Site's other recreational facilities or landscaped walking trails, direct access to the Zev Greenway, and public use of the community room in the gymnasium building in an area that lacks neighborhood park facilities. These features, as provided for by the Project, would reduce demand for off-site parks and recreation uses and meet the criterion of neighborhood park uses within walking distance of the surrounding neighborhood, as well as provide the highest priority recreational uses (walking paths) and high priority uses (gymnasium and swimming pool) identified in the RAP's Citywide Community Needs Assessment for the South San Fernando Valley geographic area. Nonetheless, the elimination of public access to the Project Site under Alternative 4 is not expected to result in the accelerated deterioration of off-site recreational facilities. Alternative 4 or the Project would not require the need for new or physically altered government facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios. Thus, impacts to public parks and recreational facilities during operation of Alternative 4 and the Project would be less than significant. However, because Alternative 4 would not provide any park spaces or recreational facilities for public use, impacts would be greater under Alternative 4 than under the Project.

(m) Transportation

(i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities

The Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, and Alternative 4 would support multimodal transportation options (shuttling) and a reduction in VMT associated with the existing Project Site (consistent with LADOT's methodology which excludes the Project's VMT components related to community use), as well as promote transportation-related safety in the Project area. Neither Alternative 4 nor the Project would conflict with policies of the Mobility Plan 2035 adopted to protect the environment and reduce VMT. Both Alternative 4 and the Project would be consistent with applicable transportation goals of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan to discourage non-residential traffic flow onto neighborhood streets and with the Community Plan and Los Angeles River Master Plan Landscaping Design Guidelines and Plant Palettes to increase accessibility to the Los Angeles River. Driveway design under both the Project and Alternative 4 would exceed the 30-foot maximum driveway width under MPP Section 321. The widths of the

driveways would enhance safety by accommodating a median island to restrict turns into and out of the driveway (in the case of the northern driveway that would be located in proximity to the clubhouse) or serve as an extension of broader Valleyheart Drive (in the case of the southern driveway that would be located in proximity to LAFD Station 78). While the Project and Alternative 4 would not be consistent with the MPP Section 321 requirement, the inconsistency would not result in increased circulation, pedestrian or vehicular conflicts and, as such, would be less than significant. . Neither Alternative 4 nor the Project would conflict with the Plan for a Healthy Los Angeles by providing for pedestrian and bicycle access around the Project Site. Because neither Alternative 4 nor the Project would conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, transportation impacts would be less than significant. However, because Alternative 4 would preclude public access to the Project Site and include fewer opportunities for public access (bicyclists and pedestrians) on and through the Project Site, it would support policies related to enhancing pedestrian and bicycling facilities/connectivity, as well as access to the Los Angeles River, to a lesser extent than the Project. For this reason, impacts are considered greater under Alternative 4 than under the Project.

(ii) Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)

The Project, as evaluated in Section IV.M, Transportation, of this Draft EIR, would generate an estimated total daily VMT of 3,932 miles. When subtracting the Project's VMT from the existing conditions (daily VMT of 6,030 miles), the Project would result in an estimated net decrease of 2,098 daily VMT compared to existing conditions. This reduction is consistent with LADOT's methodology which excludes the Project's VMT components related to community use. Under Alternative 4, public use of the Project Site would be eliminated. However, because LADOT's methodology for calculating VMT excludes the Project's community uses, for purposes of assessing transportation impacts, the calculated VMT under the Project and Alternative 4 would be the same. Therefore, as Alternative 4 and the Project would result in a net decrease in daily VMT compared to existing conditions, impacts regarding VMT would be consistent with the LADOT's TAG related to trip reduction and, thus, would be consistent with CEQA Guidelines Section 15064.3(b). Therefore, VMT impacts under both Alternative 4 and the Project would be less than significant and similar.

(iii) Geometric Design Hazards

The Project as evaluated in Section IV.M, *Transportation*, of this Draft EIR, and Alternative 4 would remove the existing parking lot on Whitsett Avenue and provide for two driveways into the Project Site. Under the Project and Alternative 4, one 39-foot-wide driveway would be provided on Whitsett Avenue, several hundred feet south of Valley Spring Lane, with the second driveway taking access on Valleyheart Drive just south of LAFD Fire Station 78. The Whitsett Avenue driveway would enhance safety by accommodating a median island to restrict turns into and out of the driveway to right-turns

only. Both driveways would be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic. In addition, pedestrians and bicycles would have separate entrances to the Project Site from the vehicular driveways. Neither Alternative 4 nor the Project would add vehicular traffic that would exceed the queuing capacity of nearby freeway off-ramps. Thus, impacts with respect to geometric design hazards under Alternative 4 and the Project would be less than significant and similar.

(iv) Emergency Access

(a) Construction

The Project, as evaluated in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, and Alternative 4 would include temporary construction activities and generate construction vehicle trips that could potentially affect emergency access to the Project Site and surroundings. Alternative 4 would export 238,100 cubic yards of excavated materials, which would generate 34,014 truck trips. The Project would export 250,000 cubic yards of excavated materials, which would generate 35,714 haul truck trips. Potential congestion affecting emergency access under Alternative 4 or the Project would be addressed through Project Design Feature TRAF-PDF-1, via implementation of a CMP. The CMP would provide designated haul routes, a staging plan, and programs to be reviewed by the LADOT, to ensure that access to neighborhood and collector streets in proximity to the Project Site remain unobstructed. Project Design Feature TRAF-PDF-1 also requires coordination with emergency service providers to ensure adequate emergency access. With implementation of the CMP, construction activities would not result in obstructed emergency access in the area. Therefore, emergency access impacts during construction, under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would reduce the duration of Project construction and construction truck trips, impacts would be less under Alternative 4 than under the Project.

(b) Operation

The Project Site, as described in Section IV.L.3, *Parks and Recreation,* of this Draft EIR, is located in an established urban area served by a roadway network, and multiple routes exist in the area for emergency vehicles and evacuation. Project Design Feature TRAF-PDF-2, which requires a driveway warning signal, would prevent conflicts between Alternative 4 or the Project's vehicle traffic and fire emergency vehicles leaving from or arriving to LAFD Fire Station 78. On surrounding roadways, drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. No policy or procedural changes to an existing risk management plan, emergency response plan, or evacuation plan would be required due to implementation of the Project or Alternative 4. Under both Alternative 4 and the Project, driveways would be subject to LAFD review to confirm that adequate access is provided internally for on-site emergency vehicle access. With review and approval of Project Site access and circulation plans by the LAFD, neither Alternative 4 nor the Project would impair implementation of, or physically interfere with, adopted

emergency response or emergency evacuation plans. Impacts with respect to emergency access under Alternative 4 and the Project would be less than significant and similar.

(n) Tribal Cultural Resources

Under the Project, as discussed in Section IV.N, *Tribal Cultural Resources*, of this Draft EIR, excavation would be required for the gymnasium building, pool, subterranean parking garage, and stormwater capture and reuse system, with maximum depths extending to 21 feet bgs. Although Alternative 4 would eliminate the Project's underground stormwater capture and reuse system, maximum depths would extend to 21 feet bgs as under the Project. Both Alternative 4 and the Project have the potential to encounter previously undiscovered subsurface tribal cultural resources. The City's AB 52 consultation efforts and the records searches conducted through SCCIC and the NAHC indicated no known tribal cultural resources within the Project Site or surrounding area. However, in the event that buried tribal cultural resources are encountered during excavation or other construction activity, the City's standard condition of approval to address inadvertent discovery of archaeological resources would be enforced. With implementation of the standard condition of approval, neither the Project nor Alternative 4 would cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, and impacts would be less than significant. However, because Alternative 4 would reduce the extent of excavation activities, impacts to tribal cultural resources would be less under Alternative 4 than under the Project.

(o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste

(i) Water Supply

(a) Construction

Construction activities under the Project, as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR, or Alternative 4 would require approximately 1,000 to 2,000 gpd of water for dust control and other construction-related purposes. Alternative 4 and the Project's intermittent construction-related water demand would be met by LADWP's available water supplies. As such, adequate water supplies would be available from existing entitlements and resources for construction activities. LADWP has sufficient water supplies to serve both Alternative 4 and the Project into the reasonably foreseeable future during normal, dry, and multiple-dry years. Any construction relative to the water delivery system for Alternative 4 or the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access

wherever construction of wastewater lines would impede such access. Therefore, Alternative 4 and the Project's impacts on water supply during construction would be less than significant. However, because Alternative 4 would reduce the duration and scale of earthwork, water required for construction activity would be less than under the Project.

(b) Operation

The Project as evaluated in Section IV.O.1, *Utilities and Service Systems - Water Supply,* of this Draft EIR, would increase on-site water demand to approximately 39,798 gpd or 44.60 AFY. Deducting existing water use, the net increase would be 6,919 gpd or 7.77 AFY. Because Alternative 4 would reduce public visitation and use of the Project Site, it would reduce the Project's domestic water demand. However, all of the occupied uses, such as the gymnasium, representing the highest water demand, and the swimming pool would be similarly operational without public visitors. As with the Project, Alternative 4 would implement Project Design Feature WS-PDF-1 regarding the use of artificial turf to reduce irrigation demand. However, Alternative 4 would not implement Project Design Feature WS-PDF-2 to use the Project's stormwater capture and reuse system to reuse captured and treated stormwater for irrigation water. Depending on rainfall frequency and volume, a minimum of one-third (approximately 3.3 AFY) of the Project's total annual irrigation demand (approximately 10 AFY) is expected to be provided by the Project's one-million-gallon stormwater capture and reuse system. The overall amount of landscaped/planted areas under Alternative 4 would be generally similar to the Project. Overall, the water savings from the Project's underground capture and reuse system would be greater than the demand saved from excluding the public from the Project Site under Alternative 4. The LADWP's water infrastructure and water supply are sufficient to meet demand and, as such, the impact of Alternative 4 and the Project related water supply and infrastructure would be less than significant. However, because Alternative 4 would not implement Project Design Feature WS-PDF-2 to reduce irrigation demand, impacts related to water supply would be greater under Alternative 4 than under the Project.

(ii) Wastewater

(a) Construction

Under the Project, as evaluated in Section IV.O.2, *Wastewater,* of this Draft EIR, and Alternative 4, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Construction of Alternative 4 or the Project would include all necessary on- and off-site sewer pipe improvements and connections. If existing sewer lines are found to be substandard or deteriorated, the necessary improvements would be required to achieve adequate service under the City's Building and Safety Code and LADPW requirements. Construction relative to the wastewater system for the Project would occur at the Project Site and immediate vicinity and, if required, would be minimal and confined to trenching in place and would be temporary in nature. In addition, the Project would implement a CMP under Project Design Feature TRAF-PDF-1, to reduce temporary pedestrian and

traffic impacts during construction, including maintaining lanes of travel and ensuring safe pedestrian access and adequate emergency vehicle access wherever construction of wastewater lines would impede such access. With the use of portable facilities during construction and implementation of any necessary upgrades, impacts to wastewater facilities under either Alternative 4 or the Project would be less than significant and similar.

(b) Operation

The Project, as evaluated in Section IV.O.2, *Wastewater,* of this Draft EIR, is estimated to result in a maximum, worse-case wastewater generation of 527,574 gpd, or approximately 0.527 mgd. This demand takes into account the possible need for a full flush of the 52-meter pool concurrent with peak wastewater generation from every other source on the Project Site (although a full flush is a rare occurrence and may occur only a few times a year). The majority of the daily wastewater generation would be related to School use of the gymnasium and other recreational facilities, although Alternative 4 would reduce the use of the gymnasium, pool, locker rooms, and lavatories as compared to the Project, both Alternative 4 and the Project would reduce potential impacts to the local sewer system during operation with the implementation of Mitigation Measure WW-MM-1, to discharge the swimming pool at a rate of no more than 166,000 gallons per day and Mitigation Measure WW-MM-2 to 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. As such, Alternative 4 and the Project's additional wastewater generation would be within the capacity limits of the conveyance and treatment facilities serving the Project Site. With the required mitigation measures, impacts to wastewater facilities under both Alternative 4 and the Project would be less than significant. However, because Alternative 4 would reduce wastewater generation, impacts would be less under Alternative 4 than under the Project.

(iii) Solid Waste

(a) Construction

The Project, as evaluated in Section IV.O.3, *Solid Waste,* of this Draft EIR, and Alternative 4 would result in the same volume of demolition debris. With the demolition of existing uses slated for removal, the Project would generate an estimated 397,493 tons (pre-diversion) and 99,373 net tons of C&D waste. Of this total, 375,000 tons is exported soil (250,000 cubic yards). Since Alternative 4 would reduce the Project's soil export of 250,000 cubic yards to 238,100 cubic yards, it would reduce the tonnage of exported soils from 375,000 to 357,150, or a reduction of 17,850 tons. Both Alternative 4 and Project C&D waste totals represent a small fraction of the available capacity of the County's Azusa Land Reclamation landfill, or one of the inert debris engineered fill operations in Los Angeles County. As such, impacts associated with construction under either Alternative 4 or the Project would be less than significant. However, because Alternative 4 would result in less C&D waste, impacts would be less under Alternative 4 than under the Project.

(b) Operation

Under the Project, as evaluated in Section IV.O.3, *Solid Waste,* of this Draft EIR, assuming a diversion rate of 65 percent, 63 tons (post-diversion) of solid waste per year would be generated. The Project's solid waste disposal would represent approximately 0.0006 percent of the County's remaining landfill capacity in 2025. Alternative 4 would eliminate public use of the Project Site. Alternative 4 would decrease the Project's average daily number of persons from 1,955 to 344 persons per day, an 82 percent decrease compared to the Project. Because solid waste generate is based on a per person basis, operational solid waste would also be reduced by 82 percent compared to the Project. Alternative 4 and the Project's additional solid waste generation would be accommodated by landfills with adequate capacity and, as such, impacts would be less than significant. However, because Alternative 4 would generate less solid waste, impacts would be less under Alternative 4 than under the Project.

(3) Relationship of the Alternative to Project Objectives

Alternative 4, the No Public Use/No Public Events Alternative, would consist of the same uses and scale of development as the Project, with the exception of the elimination of the Project's underground stormwater capture and reuse system. Alternative 4, would use the Project Site for Harvard-Westlake School's recreational and academic purposes only, as well as Harvard-Westlake Special Events, and would not provide for any public access, public participation in recreational activities, or non-Harvard-Westlake special events. As the underlying purpose of the Project is 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, Alternative 4 would be fully consistent with the following Project Objectives:

Objective 1: Develop a state-of-the-art indoor and outdoor athletic and recreational facility to support the School's existing athletic programs and co-curricular activities, including basketball, soccer, football, track and field, tennis, swim, water polo, volleyball, fencing, weight training, dance, yoga, physical fitness, and wrestling programs.

Objective 3: Provide opportunities for academic use of the Project Site through science labs and outdoor classes, water quality monitoring, bird watching, and other non-athletic school activities.

Objective 6: Implement a tree planting program that substantially increases the number of trees on the Project Site with native and RIO-compliant tree species, while removing invasive exotic and non-RIO compliant tree species.

Objective 7: Promote compatibility with the surrounding neighborhood through a design that (1) includes mature trees and extensive landscaping along the northern edge of the Project Site; (2) reduces off-site noise effects through placement of recreational facilities internal to the Project Site, use of landscaped walls and berms, and use of canopy structures adjacent to pool and playfield areas; (3) limits light

spillover and glare through use of field lights with light-emitting diode (LED) technology, timer controls, and shields that comply with LAMC and RIO requirements; (4) provides ample on-site parking and prohibits off-site parking; and (5) maximizes public safety through 24-hour, seven-day a week on-site security, monitored points of entry, and enforcement of a prohibition on off-site parking.

Alternative 4 would not incorporate the Project's stormwater capture and reuse system, provide for public access or use of facilities and, therefore, would only be partially consistent with the following Project Objectives:

Objective 5: Increase public access to and enhance the adjacent Los Angeles River and Zev Greenway through a network of publicly accessible pathways, a new direct connection to the Zev Greenway, and a landscape plan that would restore native plant communities, create habitat for various species, and support the goals of the Los Angeles River Improvement Overlay District Ordinance, the Los Angeles River Revitalization Master Plan, and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.

Objective 8: Incorporate sustainable and green building design through such features as a stormwater capture and on-site reuse system to improve water quality by treating runoff from the Project Site and adjacent areas that now flows directly to the Los Angeles River; a landscape plan featuring native and RIO-compliant plant species with low to medium water demand; elimination of turf and use of artificial grass to reduce water demand and use of pesticides; solar voltaic panels and energy efficient building design; electric vehicle charging stations; and bike facilities.

Objective 9: Retain and rehabilitate the existing clubhouse with café, associated putting green, low brick retaining wall, and golf ball-shaped light standards for public use and leisure to convey their historic value as character defining features of the Historic-Cultural Monument, the Studio City Golf and Tennis Club (now Weddington Golf & Tennis), as a post-World War II recreational facility and as an important local example of Ranch style architecture.

Alternative 4 would not provide public access to the Project Site or new access points to the Zev Greenway from the Project Site, or incorporate the Project's stormwater capture and reuse system and would, thus, not be consistent with the following Project Objectives:

Objective 2: Provide opportunities for shared use of a variety of types of recreational facilities and activities for the community.

Objective 4: Create new publicly accessible open space with a broad array of recreational facilities in a safe and secure environment for the surrounding community and the public to use similar to a City-owned park, while also providing a community room, café, and indoor and outdoor areas for public gatherings, performances, and occasional special events.

7. 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*, based on the detailed evaluation of the potential impacts associated with each Alternative provided in the previous sections. 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*, 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. By contrast and as shown in Table V-2, Alternative 2, the At Grade Alternative, would reduce 21 of the Project's 59 less-than-significant impacts and impacts that would be less than significant with mitigation as evaluated in this Chapter. Alternative 2 would also reduce the duration and, thus, the scale of the Project's significant and unavoidable construction noise impact. Because Alternative 2 would result in similar scale and mix of uses and activity as under the Project, reductions in environmental impacts would be based primarily on reduced excavation activity and hauling associated with the elimination of the subterranean garage and stormwater capture and reuse system. Alternative 2 would primarily reduce the Project's construction-related air quality impacts, cultural resources (archaeological resources and human remains), energy demand, GHG emissions, and other impacts related to construction activities. As further shown in Table V-3, because Alternative 2 would provide the same recreational facilities, open space, and public access as the Project, it would fully, substantially, or partially meet all nine of the Project's Objectives.

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Aesthetics					
Light and Glare					
Construction	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Air Quality					
Consistency or Conflict with Air Quality Management Plan					
Construction	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Operation	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Cumulative Increase of Criteria Pollutants					
Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Exposure of Sensitive Receptors to Pollutant Concentrations - Localized Emissions					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Carbon Monoxide Hotspots	Less than Significant	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Exposure of Sensitive Receptors to Pollutant Concentrations - Toxic Air Contaminants					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Biological Resources					
Candidate, Sensitive or Special Status Species	Less than Significant with Mitigation	Less (Less than Significant)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Riparian Habitat or Sensitive Natural Communities	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Wildlife Corridors or Nursery Sites	Less than Significant with Mitigation	Less (Less than Significant)	Similar (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Conflict with Policies or Ordinances Protecting Biological Resources	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
City-Protected and Non-Protected Significant Trees and Shrubs	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Cultural Resources					
Historical Resources	Less than Significant with Mitigation	Less (Less than Significant)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Archaeological Resources	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Human Remains	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Energy					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Geology and Soils					
Seismic Hazards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Soil Erosion or Loss of Topsoil	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Unstable Geologic Units	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Expansive Soils	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Paleontological Resources	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant with Mitigation)
Greenhouse Gas Emissions					
GHG Emissions/Consistency with Plans	Less than Significant	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Hazards and Hazardous Materials					
Transport, Use, or Disposal of Hazardous Materials					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Less (Less Than Significant Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Accidental Release of Hazardous Materials	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Use of Hazardous Materials within One-Quarter Mile of a School					
Construction	Less than Significant with Mitigation	Less (No Impact)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Hydrology and Water Quality					
Water Quality Standards and Groundwater Quality					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Changes in Groundwater Supplies					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Alteration of Drainage Patterns					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Land Use and Planning					
Plan Consistency	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Noise					
Noise					
Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Vibration					
Construction	Significant and Unavoidable with Mitigation (Human Annoyance)	Less (No Impact)	Less (Significant and Unavoidable with Mitigation – Human Annoyance)	Less (Significant and Unavoidable with Mitigation – Human Annoyance)	Less (Significant and Unavoidable with Mitigation – Human Annoyance)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Public Services					
Fire Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Police Protection					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Parks and Recreation					
Construction	Less than Significant	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)
Transportation					
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Geometric Design Hazards	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Emergency Access					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Use or Feature	Project	Alternative 1: No Project/ No Build	Alternative 2: At Grade Parking	Alternative 3: Reduced Density and Programming	Alternative 4: No Public Use/No Public Events
Operation	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Tribal Cultural Resources					
Tribal Cultural Resources Impacts	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Utilities and Infrastructure					
Water Supply					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)
Wastewater					
Construction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Operation	Less than Significant with Mitigation	Less (Less than Significant)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Solid Waste					
Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Operation	Less than Significant	Less (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)

SOURCE: ESA. 2021

TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development Alternative**	**Alternative 2 At Grade Alternative**	**Alternative 3 Reduced Density and Programming Alternative**	**Alternative 4 No Public Use/ No Public Events Alternative**
1. Develop a state-of-the-art indoor and outdoor athletic and recreational facility to support the School's existing athletic programs and co-curricular activities, including basketball, soccer, football, track and field, tennis, swim, water polo, volleyball, fencing, weight training, dance, yoga, physical fitness, and wrestling programs.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially, but not Fully Meets Objective	Fully Meets Objective
2. Provide opportunities for shared use of a variety of types of recreational facilities and activities for the community.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially, but not Fully Meets Objective	Does not Meet Objective
3. Provide opportunities for academic use of the Project Site through science labs and outdoor classes, water quality monitoring, bird watching, and other non-athletic school activities.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective
4. Create new publicly accessible open space with a broad array of recreational facilities in a safe and secure environment for the surrounding community and the public to use similar to a City-owned park, while also providing a community room, café, and indoor and outdoor areas for public gatherings, performances, and occasional special events.	Fully Meets Objective	Does Not Meet Objective	Fully Meets Objective	Substantially, but not Fully Meets Objective	Does Not Meet Objective

TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development Alternative**	**Alternative 2 At Grade Alternative**	**Alternative 3 Reduced Density and Programming Alternative**	**Alternative 4 No Public Use/ No Public Events Alternative**
5. Increase public access to and enhance the adjacent Los Angeles River and Zev Greenway through a network of publicly accessible pathways, a new direct connection to the Zev Greenway, and a landscape plan that would restore native plant communities, create habitat for various species, and support the goals of the Los Angeles River Improvement Overlay District Ordinance, the Los Angeles River Revitalization Master Plan, and the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Substantially, but not Fully Meets Objective	Partially Meets Objective
6. Implement a tree planting program that substantially increases the number of trees on the Project Site with native and RIO-compliant tree species, while removing invasive exotic and non-RIO compliant tree species.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Fully Meets Objective

TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development Alternative**	**Alternative 2 At Grade Alternative**	**Alternative 3 Reduced Density and Programming Alternative**	**Alternative 4 No Public Use/ No Public Events Alternative**
7. Promote compatibility with the surrounding neighborhood through a design that (1) includes mature trees and extensive landscaping along the northern edge of the Project Site; (2) reduces off-site noise effects through placement of recreational facilities internal to the Project Site, use of landscaped walls and berms, and use of canopy structures adjacent to pool and playfield areas; (3) limits light spillover and glare through use of field lights with light-emitting diode (LED) technology, timer controls, and shields that comply with LAMC and RIO requirements; (4) provides ample on-site parking and prohibits off-site parking; and (5) maximizes public safety through 24-hour, seven-day a week on-site security, monitored points of entry, and enforcement of a prohibition on off-site parking.	Fully Meets Objective	Does Not Meet Objective	Substantially, but not Fully Meets Objective	Substantially, but not Fully Meets Objective	Fully Meets Objective
8. Incorporate sustainable and green building design through such features as a stormwater capture and on-site reuse system to improve water quality by treating runoff from the Project Site and adjacent areas that now flows directly to the Los Angeles River; a landscape plan featuring native and RIO-compliant plant species with low to medium water demand; elimination of turf and use of artificial grass to reduce water demand and use of pesticides; solar voltaic panels and energy efficient building design; electric vehicle charging stations; and bike facilities.	Fully Meets Objective	Does Not Meet Objective	Partially Meets Objective	Partially Meets Objective	Partially Meets Objective

TABLE V-3
ABILITY OF ALTERNATIVES TO MEET PROJECT OBJECTIVES

Project Objective	Ability to Meet Project Goal/Objective				
	Project	**Alternative 1 No Project/ No Development Alternative**	**Alternative 2 At Grade Alternative**	**Alternative 3 Reduced Density and Programming Alternative**	**Alternative 4 No Public Use/ No Public Events Alternative**
9. Retain and rehabilitate the existing clubhouse with café, associated putting green, low brick retaining wall, and golf ball-shaped light standards for public use and leisure to convey their historic value as character defining features of the Historic-Cultural Monument, the Studio City Golf and Tennis Club (now Weddington Golf & Tennis), as a post-World War II recreational facility and as an important local example of Ranch style architecture.	Fully Meets Objective	Does not Meet Objective	Fully Meets Objective	Fully Meets Objective	Partially Meets Objective

SOURCE: ESA, 2020

On the other hand, Alternative 2 would result in six topics with greater environmental impacts than the Project. A large contributor to these increases is the fact that Alternative 2 would not include the one-million-gallon underground stormwater capture and reuse system, thus, greater impacts would occur with regards to hydrology/water quality and water supply. In addition, impacts to historical resources would be greater than the Project because of Alternative 2's greater contrast in setting to the Project Site's character defining features.

Alternative 3, the Reduced Density and Programming Alternative, as evaluated in this Chapter and summarized in Table V-2, would reduce 27 of the Project's 59 less-than-significant impacts and impacts that would be less than significant with mitigation. Alternative 3 would also eliminate the Project's subterranean garage and stormwater capture and reuse system, and would not require additional excavation for foundational support structures as under Alternative 2 for the elevated Field A. As such, Alternative 3 would reduce excavation volumes and hauling trips compared to the Project and Alternative 2 and reduce the Project's 30 months of construction and Alternative 2's 26 months of construction to 19 months. Alternative 3 would reduce the Project's and Alternative 2's construction air quality impacts, energy demand, GHG emissions, and other construction impacts compared to the Project and Alternative 2. The reduction in environmental effects during operation is based largely on Alternative 3's elimination of the Project's tennis courts. The elimination of the tennis courts would reduce use of the Project Site by Harvard-Westlake students, spectators and tennis staff, and eliminate public visitors wishing to use the courts. It would also reduce concurrent athletic events with tennis and soccer matches, or tennis and swimming meets. Under Alternative 3, 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). These reductions would reduce lighting, operational air emissions, energy demand, GHG emissions, and solid waste impacts compared to the Project and Alternative 2. As further shown in Table V-3, Alternative 3, would fully, substantially or partially meet all of the objectives, with the exception of those that are specific to the Project's anticipated tennis uses.

Alternative 3 would result in seven topics with greater impacts than the Project. A large contributor to these increases is the fact that Alternative 3 would not include the one-million-gallon underground stormwater capture and reuse system, thus, greater impacts would occur related to hydrology/water quality and water supply. In addition, Alternative 3's impacts to historical resources would be greater because of the greater contrast in setting to the Project Site's character defining features.

Alternative 4, the No Public Use/No Public Events Alternative, as shown in Table V-2, would reduce 29 of the Project's 58 less than significant impacts and impacts that would be less-than-significant with mitigation as evaluated in this Chapter. Alternative 4 would also reduce the duration of the Project's significant and unavoidable construction impact, with construction occurring over 28 months, rather than 30 months under the Project.

Alternative 4 would result in a similar scale of development as the Project, with the exception of the elimination of the one-million-gallon underground stormwater capture and reuse system. The elimination of this underground system would result in a reduction in excavation and hauling, but not to the same extent as under Alternatives 2 and 3, primarily because the subterranean parking garage would be included in Alternative 4. Although many of the reductions listed in Table V-2 are based on the reduction in excavation and hauling, the reduction in environmental effects under Alternative 4 is based largely on the elimination of public use of the Project Site during operation (which represents approximately 82 percent of Project Site usage under the Project). 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). With fewer hours of occupation of the Project Site and fewer occupants under Alternative 4, the Project's operational impacts regarding lighting, air emissions, energy demand, noise, fire and police services, wastewater and solid waste would be reduced.

However, as shown in Table V-3, Alternative 4, would not meet two of the Project Objectives that apply to public use of the Project Site. Alternative 4 would result in eight topics with greater environmental impacts than the Project. A large contributor to these increases is the fact that Alternative 4 would not include the one-million-gallon underground stormwater capture and reuse system, thus, greater impacts would occur related to hydrology/water quality and water supply. In addition, without public access to the Project Site, Alternative 4 would support land use and transportation policies related to enhancing pedestrian and bicycling facilities/connectivity, as well as access to the Los Angeles River, to a lesser extent than the Project.

As discussed in detail in this Chapter, 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.