CHAPTER 3 – REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

In accordance with CEQA Guidelines Section 15132(a), this chapter of the Final EIR provides revisions, clarifications, and corrections to the Draft EIR that have been made to clarify, correct, or supplement the information provided in that document. These revisions, clarifications, and corrections are the result of the responses to public and agency comments received on the Draft EIR, new information that has become available since publication of the Draft EIR, or due to recognition of inadvertent errors or omissions. The revisions herein include modifications to the Project design as presented in Topical Response No. 2 - Modifications to the Project Design, in Chapter 2, *Responses to Comments,* of this Final EIR. Revisions to the Draft EIR impact analyses, as applicable, due to the Project design modifications are also included herein. The revisions, clarifications, and corrections provided in this chapter do not add significant new information or support a conclusion that the Project would result in new or substantially more severe significant environmental impacts as compared to those disclosed in the circulated Draft EIR.

More specifically, CEQA requires recirculation of a Draft EIR only when "significant new information" is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred (refer to PRC Section 21092.1 and CEQA Guidelines Section 15088.5) but before the EIR is certified. CEQA Guidelines Section 15088.5 specifically states the following:

> *New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. 'Significant new information' requiring recirculation includes, for example, a disclosure showing that:*
>
> - *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
> - *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
> - *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*

- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that "[re]circulation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR... A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record."

As demonstrated in this Final EIR, the changes presented in this chapter do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

The supplementary information to the Draft EIR is indicated below under the respective EIR section heading, page number, paragraph, and the line within the referenced paragraph. Deletions are shown with ~~strikethrough~~ and additions are shown with double underline. The numerical reference to a paragraph refers to the paragraph on the page, not to the number of the paragraph under the subheading in the EIR section. Existing text to remain unchanged is included as plain text, without strikethrough or double underlines, to provide context for the revisions, clarifications, and corrections.

1. Executive Summary

1. Pages ES-1 and ES-2, Subsection 1, Project Description, modify the 5th paragraph on page ES-1 and the 1st paragraph on page ES-2 as follows:

The Project would include a below-grade parking structure located in the eastern portion of the Project Site, with ~~approximately 503~~ 386 automobile parking spaces. Access to the parking structure would be via a two-way driveway on Whitsett Avenue. A second driveway to access the parking structure would be via a drop-off and roundabout from Valleyheart Drive at the southeastern corner of the Project Site. This vehicle entrance area would also accommodate ~~29~~ 17 surface parking spaces.

2. Page ES-2, Subsection 1, Project Description, modify the 2nd sentence in the 2nd full paragraph as follows:

The Project would include an ~~1-milion~~ approximately 350,000-gallon stormwater capture and reuse system for water conservation and treatment purposes. The Project would also provide approximately 5.4 acres (235,224 square feet) of publicly-accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway and on-site landscaped areas, ~~water features,~~ and recreational facilities.

3. Page ES-2, Subsection 1, Project Description, modify the 3rd full paragraph as follows:

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

4. Page ES-11, Subsection b) Alternative 2: At Grade Parking Alternative, modify the 1st paragraph as follows:

Alternative 2 would eliminate the ~~503-~~ 386-space subterranean garage and the ~~1 million-~~approximately 350,000-gallon underground stormwater capture and reuse system. Under Alternative 2, the Project's 17-space surface parking lot would be retained and the one level of subterranean vehicle parking spaces would be relocated to at grade (also ~~503~~ 386 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~~ 80 feet above the elevated field, or approximately ~~85~~95 feet above grade. In lieu of the Project's ~~1 million~~ approximately 350,000-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.

5. Page ES-11, Subsection b) Alternative 2: At Grade Parking Alternative, modify the 3rd paragraph as follows:

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~~ 197,000 cubic yards to 123,223 cubic yards (8,802 trucks or 17,604 truck trips), which is a reduction of ~~126,777~~ 73,777 cy (~~114,877~~ 197,000 cubic yards ~~11,900~~ minus 123,223 cubic yards) or ~~9,055~~ 5,270 trucks or ~~18,110~~ 10,540 one-way truck trips. Overall, even after considering the elevated Field A construction, the construction duration under Alternative 2 would be approximately 26 months, or 4 months shorter than the 30 months under the Project.

6. Pages ES-11 and ES-12, Subsection c) Alternative 3: Reduced Density and Programming Alternative, modify the 4th paragraph on page ES-11 and 1st paragraph on page ES-12 as follows:

Alternative 3 would reduce the Project's scale of development and programming. The primary physical changes compared to the Project include the elimination of the tennis courts and relocation of the Project's other recreational facilities. By eliminating the tennis courts, the number of light poles above the 30-foot conforming height limit would be reduced to ~~20~~ 12 (a reduction of ~~12~~ 10 compared to 22 light poles above 30 feet under the Project). Alternative 3 would also eliminate the Project's ~~503-~~ 386-space subterranean parking garage and the ~~1-million-~~ approximately 350,000-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 pathway to the Zev Greenway trail accessible to the public through the Project Site and would also install an ADA-compliant pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue (the Coldwater Canyon Avenue Riverwalk Path Ramp). A total of 433 vehicle parking spaces would be provided under Alternative 3, compared to ~~503~~ 403 spaces under the Project.

7. Page ES-12, Subsection c) Alternative 3: Reduced Density and Programming Alternative, modify the 5th sentence in the 1st full paragraph as follows:

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-access ~~trails~~ pathways 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.

8. Page ES-12, Subsection c) Alternative 3: Reduced Density and Programming Alternative, modify the 2nd full paragraph as follows:

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~~ 197,000 cy to 90,100 cy (6,436 trucks or 12,872 truck trips), which is a reduction of ~~159,900~~ 106,900 cy (~~148,000 cy + 11,900 cy~~ 197,000 cy minus 90,100 cy) or ~~11,421~~ 7,635 trucks or ~~22,842~~ 15,270 truck trips. Total construction time of Alternative 3 would be approximately 19 months, or 11 months shorter than the 30 months under the Project.

9. Page ES-13, Subsection d) Alternative 4: No Public Use/No Public Events Alternative, modify the 1st two sentences in the 1st full paragraph as follows:

The Project's ~~1 -million-~~ approximately 350,000-gallon stormwater capture and reuse system would not be developed under Alternative 4. The ~~503-~~ 386-space subterranean parking garage, ~~29~~ 17-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.

10. Page ES-13, Subsection d) Alternative 4: No Public Use/No Public Events Alternative, modify the 1st sentence in the 3rd full paragraph as follows:

With elimination of the Project's ~~1 million-~~approximately 350,000-gallon underground stormwater capture and reuse system under Alternative 4, the Project's total soil export of ~~250,000~~ 197,000 cubic yards would be reduced by 11,900 cubic yards (850 trucks or 1,700 truck trips) to ~~238,100~~ 185,100 cubic yards (~~17,007~~ 13,221 trucks or ~~34,014~~ 26,442 truck trips).

11. Page ES-16, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.C, Biological Resources, regarding "Candidate, Sensitive, Or Special Status Species – Wildlife – Indirect" impacts, modify column 2 (Project Design Features) as follows:

~~Not applicable~~ See Project Design Features BIO-PDF-3 (Educational Materials) and BIO-PDF-4 (Waste receptacles), below.

12. Page ES-16, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.C, Biological Resources, regarding "Riparian Habitat or Other Sensitive Natural Community Identified in Local or Regional Plans, Policies, Regulations – Sensitive Natural Community – Indirect" impacts, modify column 2 (Project Design Features) as follows:

~~Not applicable~~ See Project Design Feature BIO-PDF-2 (Fencing), below.

13. Page ES-16, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.C, Biological Resources, regarding "Wildlife Corridors/Native Wildlife Nursery Sites – Wildlife Corridors," column 2 (Project Design Features), modify as follows:

~~Not applicable~~ See Project Design Features BIO-PDF-2 (Fencing), below.

14. Page ES-16, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.C, Biological Resources, regarding "Wildlife Corridors/Native Wildlife Nursery Sites – Migratory Species and Native Wildlife Nursery Sites," column 2 (Project Design Features), modify as follows:

See Project Design Feature ~~PDF-~~BIO-PDF-1 (Nesting Birds), below.

15. Page ES-16, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.C, Biological Resources, regarding "Conflict with any Local Policies or Ordinances Protecting Biological Resources," column 2 (Project Design Features), modify as follows:

See Project Design Features ~~PDF-~~BIO-PDF-1 (Nesting Birds), BIO-PDF-2 (Fencing), BIO-PDF-3 (Educational Materials), and BIO-PDF-4 (Waste Receptacles), below.

16. Page ES 21, Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures*, Subheading IV.K, Noise and Vibration, regarding "Substantial Temporary Or Permanent Increase In Ambient Noise Levels – Operation," column 2 (Project Design Features), modify as follows:

See Project Design Features NOI-PDF-1 (Sound Walls), ~~and~~, NOI-PDF-2 (Sound Systems), and NOI-PDF-4 (Special Events), below.

17. Page ES-26, Subsection a) Project Design Features, (1) Biological Resources, revise name of PDF-BIO-1 as follows:

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

18. Page ES-26, Subsection a) Project Design Features, (1) Biological Resources, add Project Design Features BIO-PDF 2 to BIO-PDF-4 as follows:

BIO-PDF-2: Small wildlife permeable fencing will be installed along the edge of the Leased Property and the Zev Greenway in order to discourage human entry into the natural community plantings of the Zev Greenway. The fence design will allow unimpeded aesthetic views to the Los Angeles River, while allowing small wildlife to pass through or under the fencing. The fence design will support the goals of the Los Angeles River Revitalization Master Plan. Also, railing will be provided along the ADA-compliant pedestrian ramp leading from the Project Site to the Zev Greenway to discourage people from entering into the natural community plantings of the Zev Greenway. The fence design and railing will be reviewed by the City prior to installation.

BIO-PDF-3: Harvard-Westlake School will make available to the Zev Greenway trail users educational materials and signage at the entrance to the ADA-compliant pedestrian ramp located between the Project's gymnasium and the Zev Greenway. The materials and signage will promote awareness that human activities, such as trail use, may impact or disturb wildlife use of open spaces. Educational materials and signage will explain how human activity impacts, inclusive of noise and odors, may have on natural habitats growing within the Zev Greenway, emphasizing the increased severity during breeding seasons. The signage will be submitted for

review by the City for compliance with any applicable regulations and will also: 1) educate and inform the public about wildlife present in the area; 2) advise on proper use of the ramp in a manner respectful to wildlife; and 3) provide local contact information to report injured or dead wildlife. Signage will be written in the language(s) understandable by residents in the local vicinity and to those most likely to use the ramp. Signage will be made of materials not harmful to wildlife, avoiding glass or the use of spikes.

BIO-PDF-4: As part of the Project's routine maintenance program, Harvard-Westlake School will place a waste receptacle at the entrance to the Project's ADA-compliant pedestrian ramp located between the Project's gymnasium and the Zev Greenway in order to avoid or minimize the potential to create an attractive nuisance of an unnatural food source for wildlife. The receptacle will be regularly maintained to avoid waste materials inadvertently entering the Zev Greenway area.

19. Page ES-27, Subsection a) Project Design Features, (2) Cultural Resources, Project Design Feature CUL-PDF-1 (Rehabilitation Plan), modify the 2nd bullet of CUL-PDF-1 as follows:

    - Appropriate measures for protecting all identified character-defining features of the Project Site during construction activity. If necessary, a physical barrier (e.g., exclusion or cyclone fencing) will be erected to separate and protect the clubhouse, and other features as needed, during construction. Vibratory rollers will not be used on the Project Site within 40 feet of the clubhouse and low brick wall with weeping mortar. Large dozers (300 horsepower and greater) and caisson drills will not be used on the Project Site within 25 feet of the clubhouse, putting green, and low brick wall with weeping mortar; loaded trucks will not be used on the Project Site within 20 feet of the clubhouse, putting green, and low brick wall with weeping mortar; and jackhammers will not be used on the Project Site within 12 feet of the clubhouse, putting green, and low brick wall with weeping mortar.

20. Page ES-28, Subsection 5 (a), Project Design Features, (3) Greenhouse Gas Emissions, modify Project Design Feature GHG-PDF-1 as follows:

    GHG-PDF-1: Solar Voltaic System. The Project will be designed to include solar voltaic panels providing ~~339,000~~ 281,000 ~~kilo Watt~~ kilowatt-hours (kWh) per year[6] on the roof of the gymnasium that would reduce the amount of electricity demand from City utilities.

    (Foootnote 6: The solar voltaic panel system would supply approximately ~~11.~~5 10.2 percent of the Project's energy demand. For complete list of assumptions refer to Appendix C of this Draft EIR and updated in Appendix K of the Final EIR.)

21. Page ES-28, Subsection a), Project Design Features, (5) Noise and Vibration, modify Project Design Feature NOI-PDF-1 as follows:

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

    - An 8- to 10-foot-high wall along portions of the northeastern and eastern sides of Field A.
    - An 8- to 11-foot-high wall along portions of the western and northern sides of Field B.
    - A ~~30~~ 14.5-foot solid overhead canopy above the swimming pool bleachers ~~and pool buildings~~.
    - An 8-foot-high solid wall along the northern edge of the tennis courts.

22. Page ES-29, Subsection a), Project Design Features, (5) Noise and Vibration, add Project Design Feature NOI-PDF-4 as follows:

    NOI-PDF-4: Special Events. Harvard-Westlake will have no more than 30 school-related special events with the following limitations on attendance: No more than 27 special events per year of up to 500 people and no more than three (3) special events per year of up to 2,000 people.

23. Pages ES-30 and ES-31, Subsection a), Project Design Features, (7) Transportation, modify Project Design Features TRAF-PDF-2 and TRAF-PDF-3 as follows:

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

    TRAF-PDF-3: On days in which event attendance is expected to surpass 300 spectators, including parents and other spectators, students will not be permitted to drive to the Project Site and will be required to use ~~the~~ Harvard-Westlake School's shuttle service. Shuttles will follow a prescribed driving route, travelling northbound on Coldwater Canyon Avenue, turning right at Moorpark Street, and turning right onto Whitsett Avenue. Spectators will park on the Project Site, and tickets and parking passes will be required to enter the Project Site. Spectators without a parking pass will be directed to park on ~~the~~ Harvard-Westlake's ~~School's~~ Upper School ~~C~~campus and ride the Harvard-Westlake School-provided shuttles to the Project Site. Parking in the neighborhood will not be permitted and will be enforced by security personnel.

A Parking and Transportation Management Plan will be employed by Harvard-Westlake School for all athletic competitions or Special Events that are expected to draw more than 300 attendees. The Parking and Transportation Management Plan will include appropriate tools to manage and control traffic and parking for competitions or events so that impacts to the surrounding areas are minimized. Potential measures will include, but are not limited to, left-turn prohibition on Special Event days, a parking reservation system to manage attendance, off-site parking at the Harvard-Westlake Upper School campus, attendant-assisted parking, temporary increases in traffic management and parking personnel as needed, use of security personnel, signage, and other measures. This Plan will be submitted to LADOT for review and approval prior to the issuance of a Certificate of Occupancy for the Project. The Plan will be monitored for a minimum of three (3) years with annual monitoring reports submitted by the Harvard-Westlake School to LADOT for review.

24. Page ES-31, Subsection a), Project Design Features, modify Project Design Feature WS-PDF-2 as follows:

WS-PDF-2: Capture and Reuse System. The Project would capture, treat, and store up to ~~1 million~~ approximately 350,000 gallons of stormwater ~~and other urban~~ runoff ~~at a time~~ from the developed portions of the Project Site~~, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site,~~ through a stormwater Low Impact Development (LID) capture and reuse cistern system, which will then use the treated stormwater for irrigation ~~or water features~~ on the Project Site.

25. Page ES-32, Subsection b) Mitigation Measures, (1) Air Quality, modify the 3rd bullet point of Mitigation Measure AQ-MM-1 as follows:

- During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, and that haul trucks limit idling for loading activities to 5 minutes or less at any one location and unloading activities to ~~10~~ 5 minutes or less at any one location ~~per one-way truck trip~~.

26. Page ES-32, Subsection b) Mitigation Measures, (2) Biological Resources, modify Mitigation Measure BIO-MM-1 as follows:

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

1. Tree removal activities shall be scheduled outside of the maternity roosting season (October 1 through February 28) to avoid potential impacts to special-status bat species during breeding season.

2. Any construction or palm tree removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist experienced with bat roost biology to conduct a pre-construction (or pre-tree removal) survey, using sonic bat detectors (e.g., Anabat ~~or Sonobat~~) and night vision goggles for an emergence survey (for at least one-hour after sunset) to determine whether special status bat species are roosting within trees that would be removed. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience). The surveys shall be conducted at dusk and after nightfall by a biologist. If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement or provision of a suitable buffer established around the roost until roosting activities cease. ~~Suitable buffers could include netting, canvas, or similar materials as recommended by the biologist.~~ A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions~~.~~ prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If special-status bats are detected during the survey, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Mitigation may include avoidance through postponing or temporarily halting construction until maternal roost use is completed, use of construction buffers of no less than 100-feet, or the installation of bat boxes in proximity to detected maternal roosts. Avoidance measures shall be based on site-specific factors to prevent roost disturbances, including, but not limited to: numbers and locations of bats, proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.

3. If special-status bats are not detected, but the bat specialist nonetheless determines that roosting bats may be present at any time of year and could roost in trees at a given location, tree removal activities shall be initiated by pushing trees using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimal warning to any roosting special-status bats that may be present, trees shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.

27. Pages ES-32 and ES-33, Subsection b) Mitigation Measures, (2) Biological Resources, modify Mitigation Measure BIO-MM-2 as follows:

BIO-MM-2: Prior to issuance of a building permit, Harvard-Westlake School shall submit to the Department of City Planning a landscape plan or mitigation plan depicting replacement of an equivalent acreage of California brittlebush scrub removed at a 1:1 ratio. The sensitive natural community does not need to be dominated only by California brittlebush, but this species shall be prevalent within the community, and the native scrub mix proposed shall use similar species as used for the Zev Greenway restoration habitat. The replacement of sensitive natural community habitat shall be planted clustered adjacent to and contiguous with the Zev Greenway, and the locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement sensitive natural community habitat areas shall be planted on-site and shall be shown on the Project's landscape plan. The restored sensitive natural community shall be monitored for five years to verify that California brittlebush scrub has been successfully restored with the survival of the plants depicted in the approved landscape plan at the conclusion of the five years of monitoring.

28. Page ES-33, Subsection b) Mitigation Measures, (2) Biological Resources, modify Mitigation Measure BIO-MM-3 as follows:

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

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

A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the Department of City Planning and/or City's Urban Forester within one-month following the completion of Project construction. After three years following the completion of Project construction a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all replacement trees.

If any of the on-site, off-site or public street trees die within three years as a consequence of construction, they shall be replaced.

2. Chapter II. Project Description

1. Page II-1, Subsection 1, Introduction, modify the 2nd and 3rd sentences of the 4th paragraph as follows:

The Project would include a ~~1 million~~ approximately 350,000-gallon stormwater capture and reuse system for water conservation and treatment purposes. The Project would also provide approximately 5.4 acres (235,224 square feet) of publicly accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Yaroslavsky Los Angeles River Greenway (Zev Greenway), an improved public trail along the northern edge of the Los Angeles River, and on-site landscaped areas, ~~water features,~~ and recreational facilities.

2. Page II-2, Subsection 1, Introduction, modify the 2nd through 4th sentences in the 1st paragraph as follows:

The Project would include a below-grade parking structure located in the eastern portion of the Project Site, with approximately ~~503~~ 386 automobile parking spaces. Access to the parking structure would be via a two-way driveway on Whitsett Avenue. A second driveway to access the parking structure would be via a drop-off and roundabout from Valleyheart Drive at the southeastern corner of the Project Site. This vehicle entrance area would also accommodate ~~29~~ 17 surface parking spaces.

3. Page II-2, Subsection 1, Introduction, modify the 3rd paragraph as follows:

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

4. Page II-3, Subsection (1), Existing On-Site Conditions, modify the 1st paragraph as follows:

Existing on-site facilities include the 2,700-square-foot clubhouse with a 10-seat café, a 799-square-foot tennis shack, and 16 tennis courts with approximately 128 court lights that reach a height of 22 feet. Two modular, metal sheds are located to the south of the tennis courts and are used to store maintenance supplies and tools. A nine-hole, 27-par

golf course (with Frisbee golf), comprising approximately 426,000 square feet, a 25-stall driving range with a 2,300-square-foot golf canopy, and a putting green are also located on the Project Site. The driving range ~~features~~ poles and net fencing~~,~~ reach~~ing~~ a maximum height along certain sections of approximately ~~100~~ 90 feet. The driving range is lit by six golf ball-shaped light standards positioned between the driving range stalls and the surface parking lot. The Weddington Golf & Tennis site also includes 89 surface parking spaces. Landscaping, including non-native turf grass, also occurs at various areas within the Project Site.

5. Page II-14,Subsection 3. Project Objectives, modify Objective 8 as follows:

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.

6. Page II-I5, Table II-1, *Summary of Major Project Components*, modify the rows shown in the table below as follows:

Component	**Size (acreages and square feet are approximate)**
Public plazas and~~, water features,~~ landscaped areas	Approximately 5.4 acres (approximately 7 acres with tennis courts)
Field A Seating	~~488~~ 542 bleacher seats
Field B Seating	~~255~~ 109 bleacher seats
Multi-purpose Gymnasium (2-story with basement)	80,249 square feet, including two courts, a community meeting room, environmental education room, team meeting rooms, weight room, flex room, team store, training room, lockers, showers, food service, and other gymnasium-related uses.
Gymnasium Seating	~~1,026~~ 1,056 retractable bleacher seats
Pool Seating	~~348~~ 214 bleacher seats
Tennis Court Seating	~~100~~ 84 bleacher seats
Below-grade Parking (below Field A and tennis courts)	~~503 spaces (233,580 square feet)~~ 386 spaces
Surface Parking	~~29~~ 17 spaces
Light Poles	~~45~~ 22 total light poles (~~range~~ ranging between ~~21~~ 40 feet and 80 feet in height)

7. Page II-16, **Figure II-6**, *Harvard-Westlake School Athletic and Recreational Facilities Conceptual Site Plan*, is updated and modified to show the reduction in the surface parking lot, the change and reconfiguration of the swimming pool bleachers and canopy, removal of pool diving boards, removal of surface water features to the west of the gymnasium, removal of the "River Overlook", removal of tennis elevator and stairs, and updated light pole quantities and locations.

   See Figure II-6 on following page(s).

8. Page II-17, Subsection (a) Athletic Fields, modify the 1st sentence in the 2nd paragraph as follows:

Field A would include bleacher seating for up to ~~488~~ 542 spectators split between the east and west sides of the field, a 25-foot x 8-foot LED scoreboard, reaching a maximum height of 21 feet when combined with approximately 10-foot support poles and 3-foot-tall donor signage on top of the scoreboard, and 6,185 square feet of ancillary structures reaching 10 feet in height, including a 4,200-square-foot locker and meeting room building at the west side of the field, as well as a visitor locker room, and three smaller restroom buildings.

9. Page II-18, **Figure II-7**, *Playing Field A Elevations – North, South, East and West Views*, is updated and modified to show revised light pole quantities and associated heights, and change in bleacher layout and composition.

   See Figure II-7 on following page(s).

10. Page II-19, Subsection (a) Athletic Fields, modify the 3rd sentence in the 1st paragraph as follows:

Fixed bleacher seating reaching four feet in height for ~~255~~ 109 spectators would be provided at the northern edge of the field, centered on the midfield line.

11. Page II-19, Subsection (I) Gymnasium Facilities, modify the 5th sentence in the 2nd paragraph as follows:

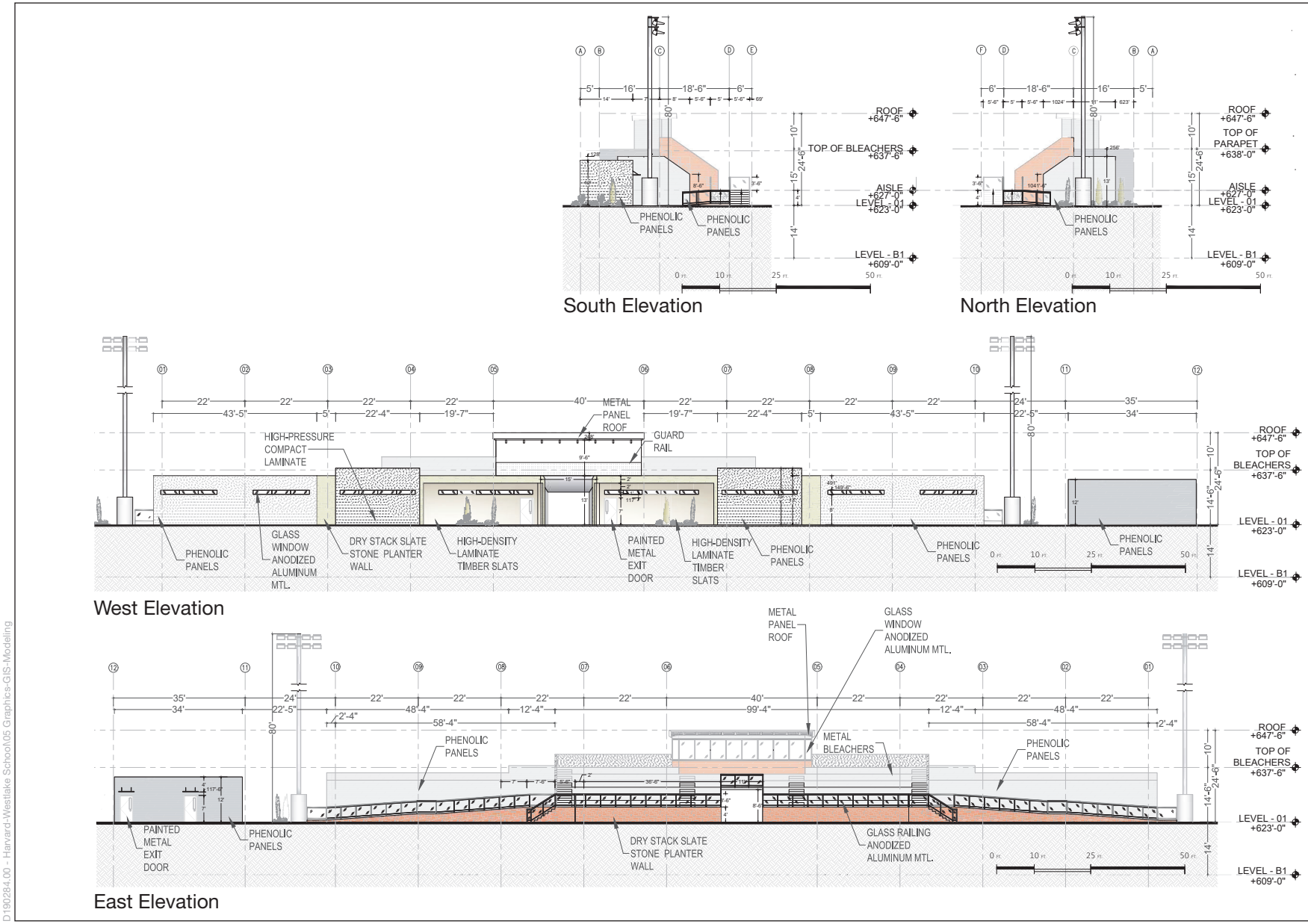
Accessible from the ground floor, the multi-purpose gymnasium would also include two courts, one with ~~1,026~~ 1,056 retractable bleacher seats for spectators and players and one without fixed seating.

SOURCE: Gensler, 2022

Harvard-Westlake River Park Project

Figure II-6

Harvard-Westlake School Athletic and Recreational Facilities Conceptual Site Plan



SOURCE: Gensler 2022

NOTES:
1. Phenolic panels: Exterior ventilated facade cladding system.
2. High-density laminate timber slats: Exterior composite panel wood-look slat cladding.
3. High-pressure compact laminate: Exterior cladding that offers moisture protection and an integral colored surface.

Harvard-Westlake River Park Project

Figure II-7
Playing Field A Elevations – North, South, East and West Views

12. Page II-20, Subsection (ii) Gymnasium Community Room, modify the subsection as follows.

(ii) Gymnasium Building Community Room and Environmental Education (River) Room

The gymnasium would also provide a ground-level community room available for public use by organizations as well as the River Room to be used for environmental education programming available to Harvard-Westlake students, students from other schools and organizations. Available through a reservation system, the community room's community-accessible meeting space would be located along the ~~southwestern~~ southeastern corner of the building. The main entrance would face the Los Angeles River and be located adjacent to newly-landscaped areas, benches, other seating, and walking ~~trails~~ pathways. ~~This area would further provide an overlook above the Los Angeles River and Zev Greenway.~~ While not directly reservable for general public use, the River Room located in the southwestern corner of the gymnasium would be used by Harvard-Westlake and approved environmental organizations to offer publicly-accessible classes, educational programming, nature walks, lectures, and cultural experiences related to the role of the Los Angeles River in the City's evolution and to those who have inhabited the area over time.

13. Page II-20, Subsection (c), Swimming Pool, modify the subsection as follows:

The Project would include a 52-meter swimming pool, which would occupy 12,672 square feet of the Project Site, and reach a maximum depth of eight feet, and a 2,200- square-foot locker and meeting room building that would reach a height of 14 feet. The pool deck and bleachers ~~surrounding~~ on the west side of the pool would occupy 12,828 square feet of the Project Site. The total area for the pool, pool locker/meeting room building, and bleachers would be 27,700 square feet~~,~~. The western pool area would include an acoustically treated shade canopy reaching a maximum height of 14.5 feet above the bleachers (see Figure II-6). ~~30 feet along the southern edge of the canopy (due to its sloped nature, the canopy only reaches a maximum height of 26 feet along the northern edge)~~. A landscaped berm would be located to the north/northwest of the pool area, and a 10-foot-tall wall would be located along the northern edge of the locker and meeting room building to reduce noise from traveling into the surrounding areas. The pool would be used for water polo~~,~~ and short- to long-form swimming~~, and one-meter and three-meter diving~~. The pool area would include fixed bleacher seating (10.5 feet in height) for up to ~~348~~ 214 spectators. The locker rooms would provide dedicated showers, restrooms, and athletic storage. A separate 460-square-foot restroom building reaching a height of 10 feet would also be located in the pool area for use by spectators in the pool area. In addition, a 1,000-square-foot, pool chemical and equipment storage area would be located in this area and would reach 15 feet below grade. ~~The southern edge of the pool area would also include a one-meter-high and a three-meter-high diving board.~~ An 18-foot x 10-foot scoreboard at 12 feet above grade would be located ~~underneath the pool canopy~~ on top of the locker and meeting room building located to the north of the pool. The scoreboard would reach a maximum height of 22 feet ~~under the 26-foot-high northern~~

~~section of the pool canopy~~. Cross sections of the swimming pool are illustrated in **Figure II-13**, *Swimming Pool Elevations – East and West Views*.

14. Page II-21, Figure II-8, *Gymnasium Elevations – North and South Views*, is updated to show that the window area on the south side of the gymnasium has been removed from the scope of the Project and will be converted to solid walls, and the window area of the north side of the gymnasium has been reduced in size.

    See Figure II-8 on following page(s).

15. Page II-22, Figure II-9, *Gymnasium Basement Level*, is updated to show the reduced footprint of the subterranean parking structure and the use of the space for mechanical facilities attached to the gymnasium building.

    See Figure II-9 on following page(s).

16. Page II-23, Figure II-10, *Gymnasium Level 1*, is updated to rename the "Flex/Team Meeting Room" to "River Room." The updated figure also shows the reduced footprint of the parking structure adjacent to the gymnasium building and a revision to the number of Court A bleacher seats.

    See Figure II-10 on following page(s).

17. Page II-24, Figure II-11, Gymnasium Level 2, is updated to show the removal of outdoor lights along Field A and the reduced footprint of the parking structure adjacent to the gymnasium building.

    See Figure II-11 on following page(s).

18. Page II-25, Figure II-12, *Gymnasium – Roof Plan*, is updated to show the removal of outdoor lights along Field A, revision to the number of solar panels on the gymnasium roof, and the reduced footprint of the parking structure adjacent to the gymnasium building.

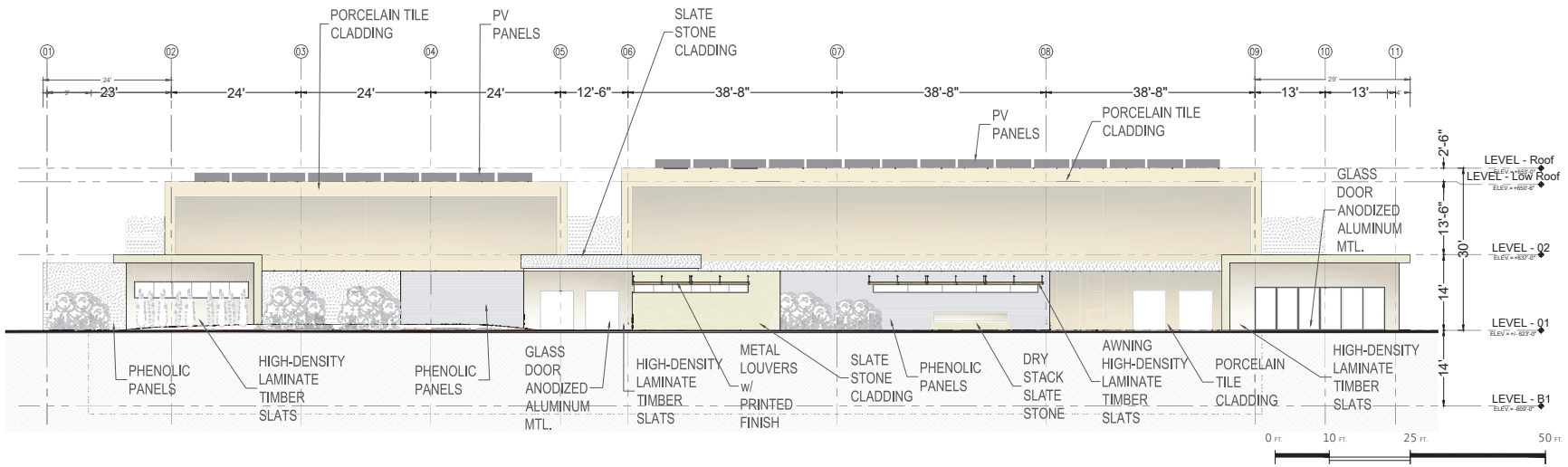
    See Figure II-12 on following page(s).

19. Page II-26, Figure II-13, *Swimming Pool Elevations – East and West Views*, is updated to show the reduction in the height and extent of the canopy, the removal of the diving boards, and the updated light pole configuration.

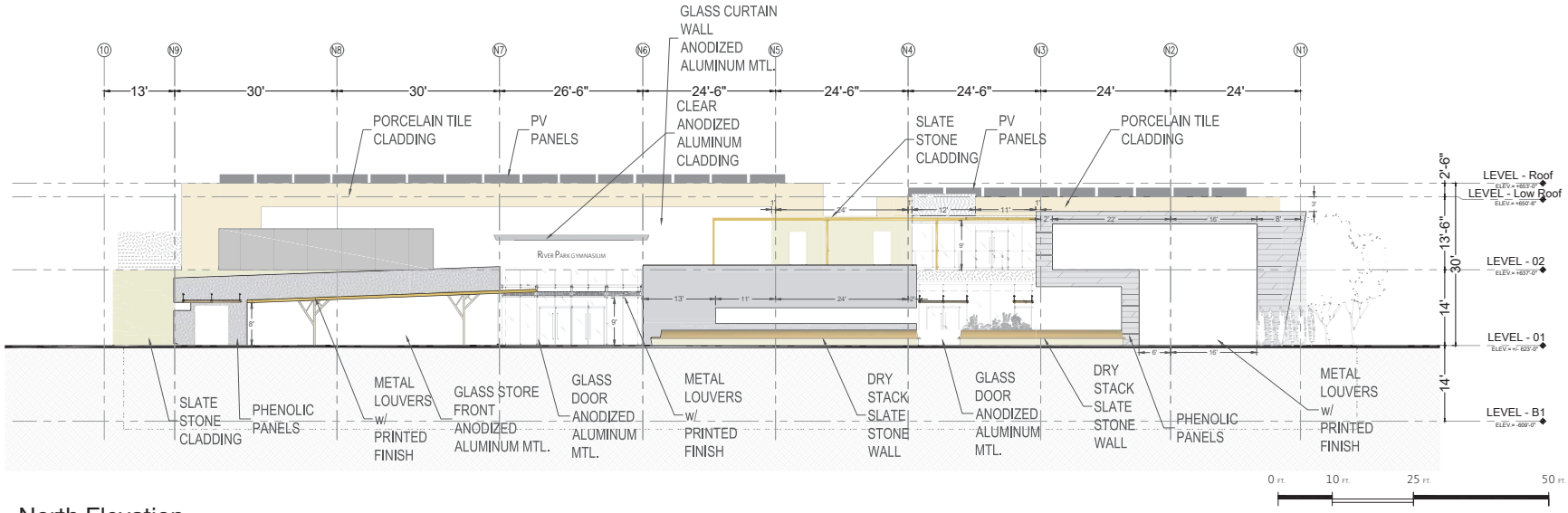
    See Figure II-13 on following page(s).

20. Page II-27, Subsection (d), Tennis Courts, modify the 2nd sentence of the 1st paragraph as follows:

The tennis area would include metal bleacher seating for the tennis courts reaching a height of 4 feet for up to approximately ~~100~~ 84 spectators between the two sets of four courts.



South Elevation



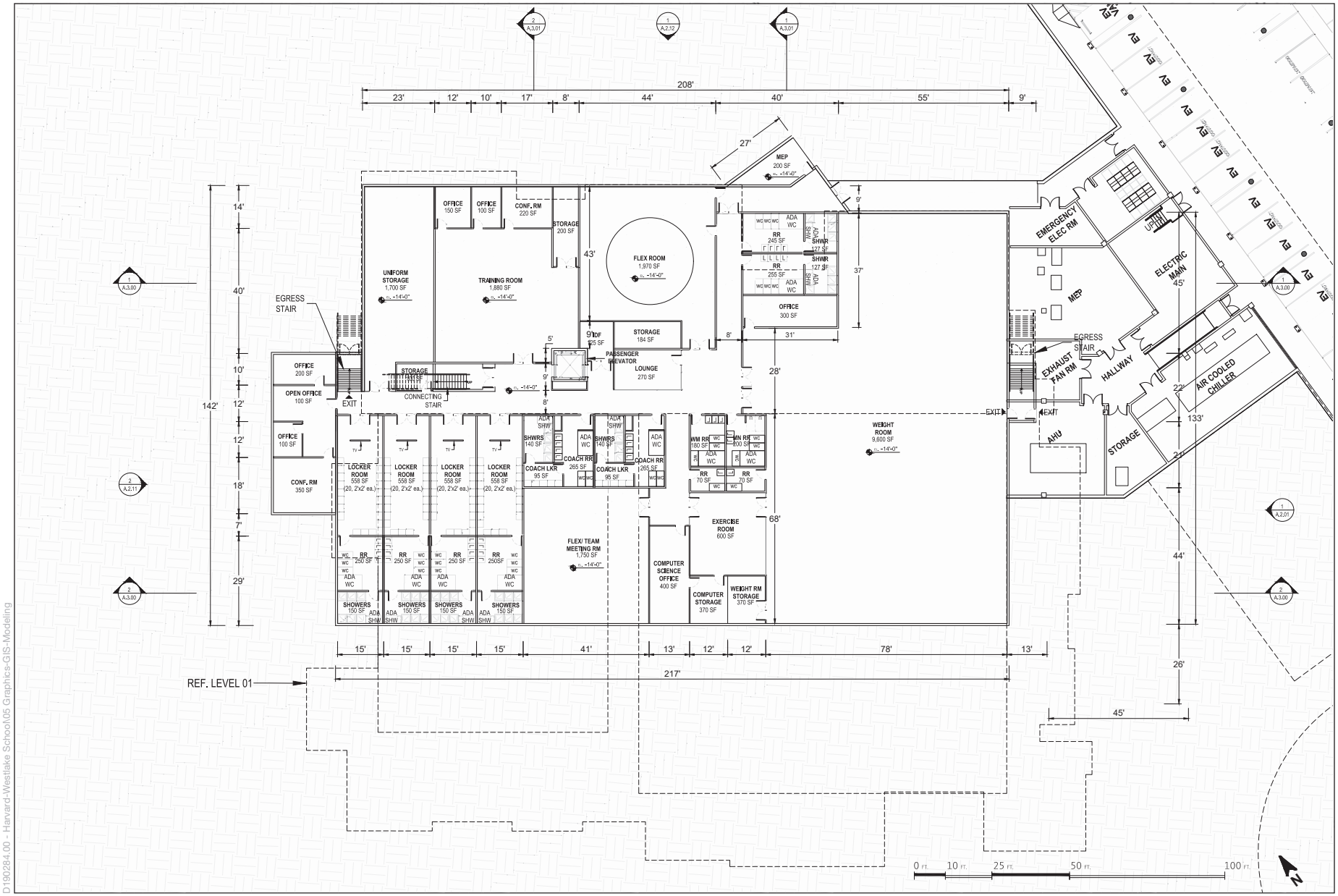
North Elevation

SOURCE: Gensler 2022

NOTES:
1. Phenolic panels: Exterior ventilated facade cladding system.
2. High-density laminate timber slats: Exterior composite panel wood-look slat cladding.

Harvard-Westlake River Park Project

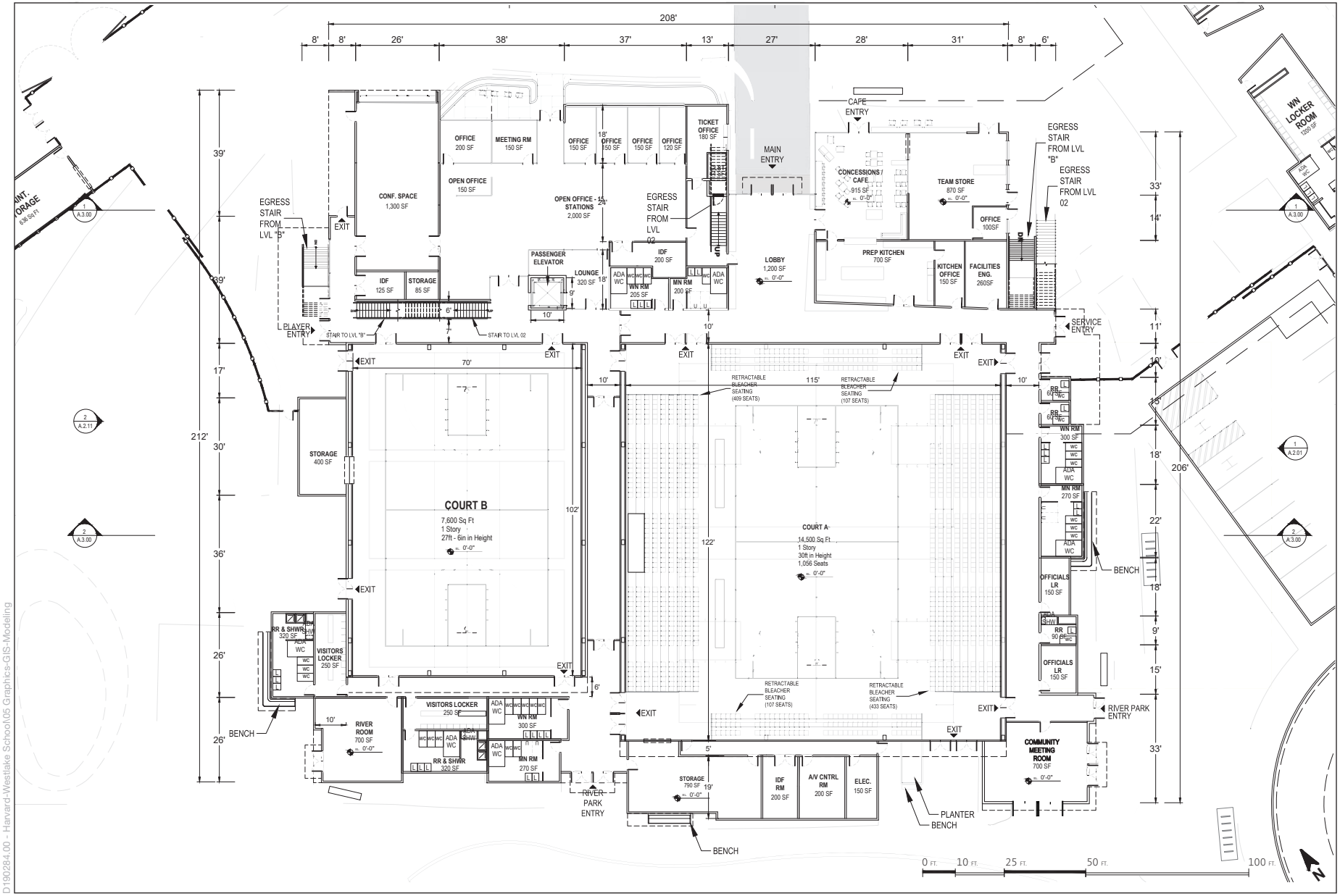
Figure II-8
Gymnasium Elevations – North and South Views



SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-9
Gymnasium Basement Level



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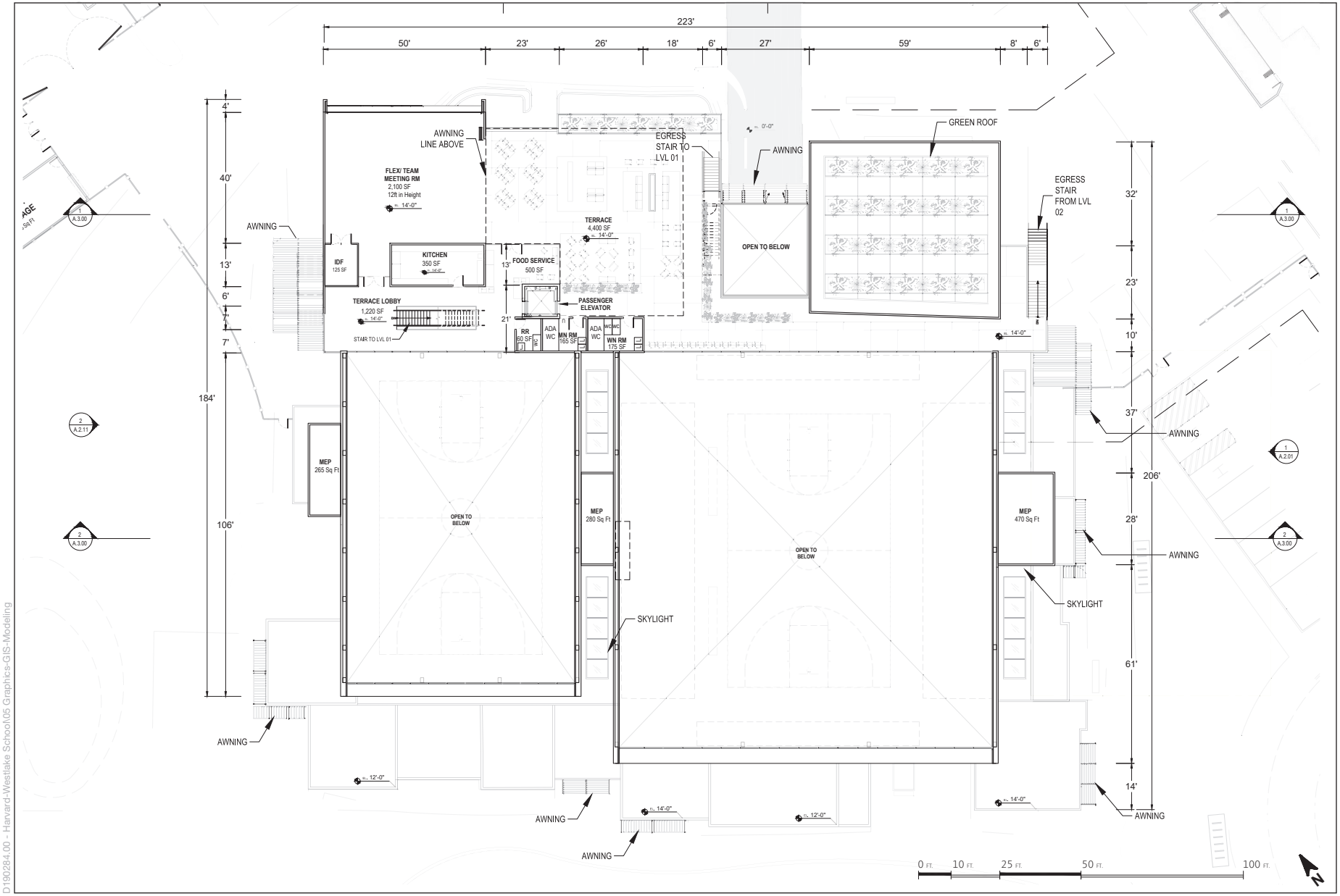
SOURCE: Gensler 2022

Harvard-Westlake River Park Project

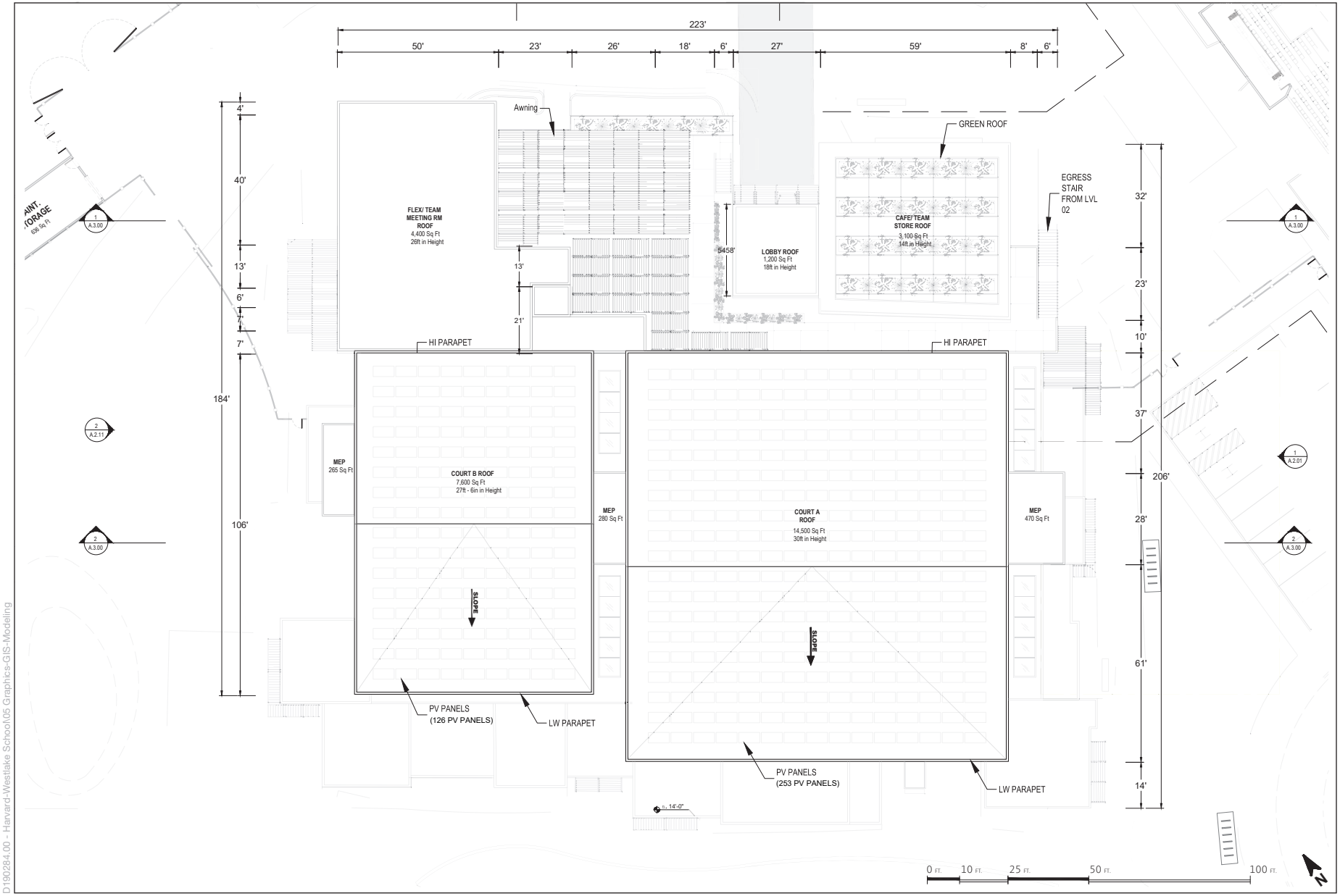
Figure II-10
Gymnasium Level 1



SOURCE: Gensler 2022

Harvard-Westlake River Park Project

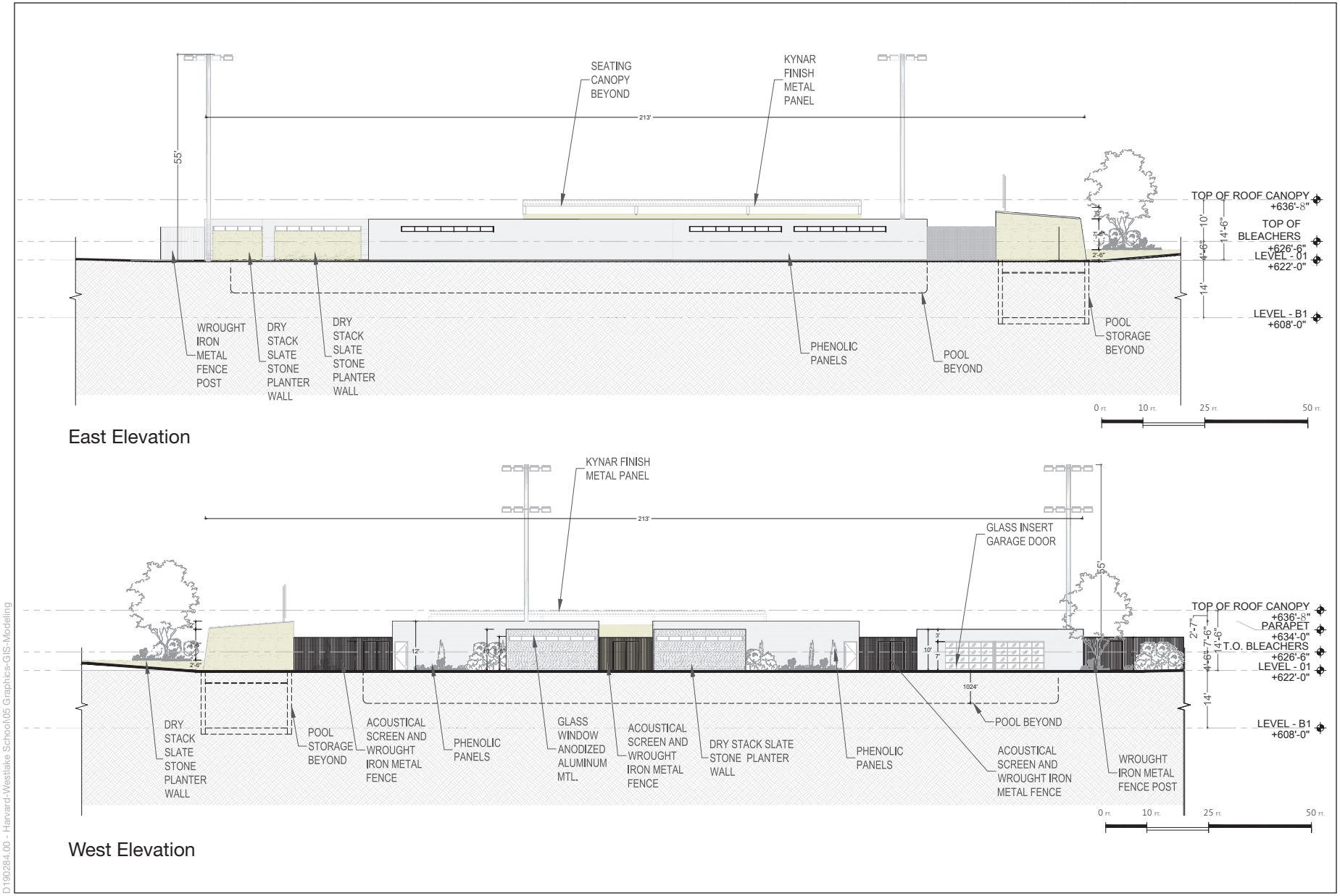
Figure II-11
Gymnasium Level 2



SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-12
Gymnasium – Roof Plan



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SOURCE: Gensler 2022

NOTES:
1. Phenolic panels: Exterior ventilated facade cladding system.
2. Kynar finish: A durable, UV resistant finish for metal mullions between glass panels.

Harvard-Westlake River Park Project

Figure II-13
Swimming Pool Elevations – East and West Views

21. Page II-33, Subsection (2), Public Use of the Project Site, add the below following the 4th paragraph:

Providing a variety of accessible recreational opportunities, the Project would support field, pool, and gym-based sports by pre-approved community groups or swim program members when not in use by the School, continued playing of tennis on eight courts, as well as regular access to approximately 5.4 acres (235,224 square feet) of passive open space and a three-quarter mile long pedestrian path with a new connection to the Zev Greenway for casual exercise by individuals or families. The multi-purpose gymnasium would include a community room that could be used for meetings and gatherings by organizations. The School would make available such uses via a reservation system that would support an enjoyable and safe experience. The gymnasium will also include a "River Room" on the southwest corner, to be used for environmental education programming available to Harvard-Westlake students, students from other schools and organizations. While not directly reservable for general public use, the River Room would be used by Harvard-Westlake and approved environmental organizations to offer publicly-accessible classes, educational programming, nature walks, lectures, and cultural experiences related to the role of the Los Angeles River in the City's evolution and to those who have inhabited the area over time.

22. Page II-34, Table II-3, *Public Use Days and Hours*, modify the 5th row as following:

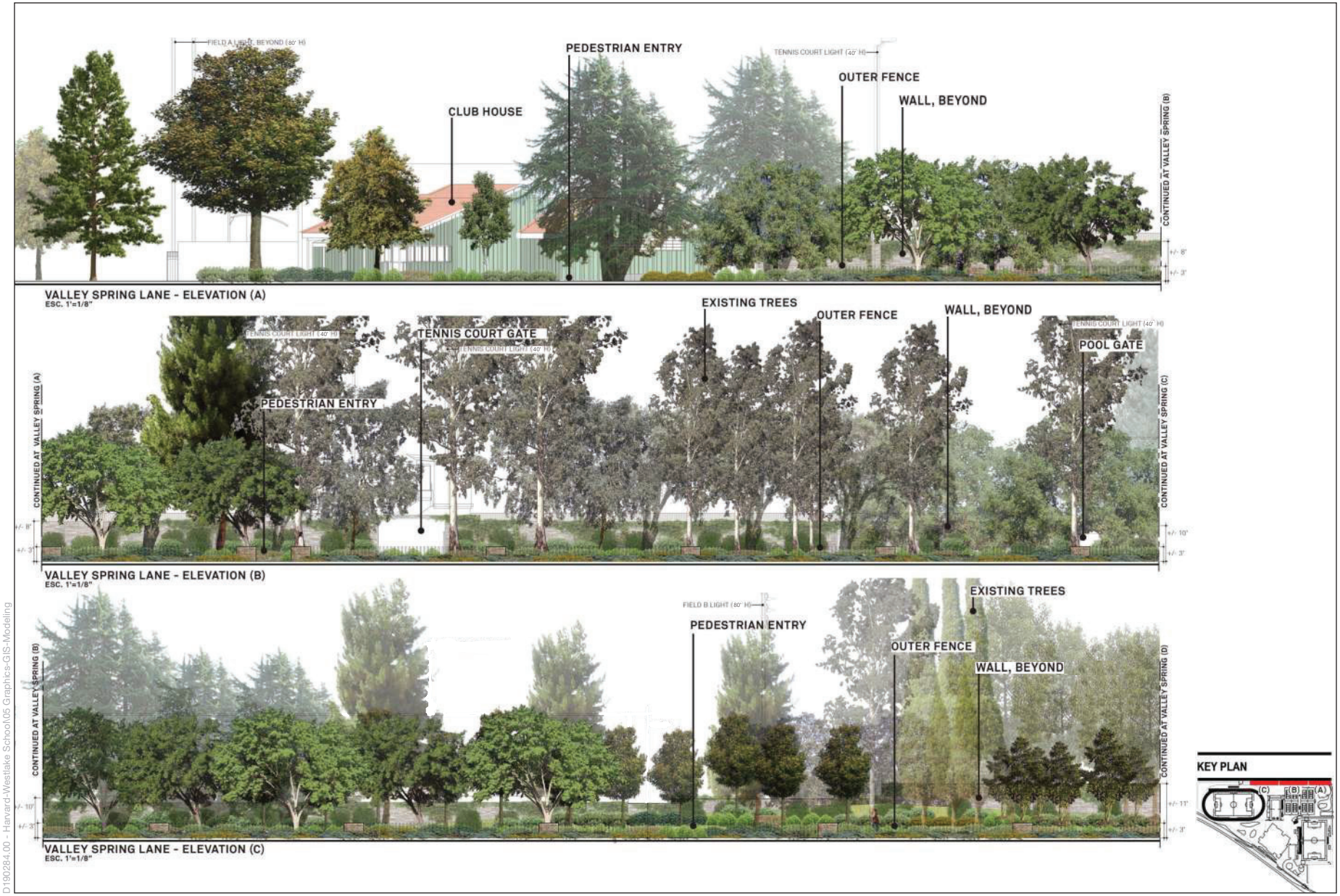
Park Areas - Pedestrian pathways~~,~~ and landscaped areas~~, water features~~	

23. Page II-35, Subsection (3), Project Elevations and Renderings, modify the 2nd paragraph of this subsection to update the name of Figure II-25 as follows:

Project renderings are provided in Figures II-20 through II-25. These include **Figure II-20**, *Rendering - View of the Project Site Entrance at Whitsett Avenue*, **Figure II-21**, *Rendering - View of the Project Site from Whitsett Avenue at Valley Spring Lane*, **Figure II-22**, *Rendering - View of the Project Site from Valley Spring Lane,* **Figure II-23***, Rendering - North-Facing View from Field B*, **Figure II-24**, *Rendering - View of the Project Site and Zev Yaroslavsky Greenway from the Southwest*, and **Figure II-25**, *Rendering of the ~~Southwestern~~ Southeastern Corner of the Gymnasium and Community Room*.

24. Page II-36, Figure II-15, *Valley Spring Lane Elevations,* is updated to show the increase in the height of the Field A and B light poles to 80 feet and reduction in the height of tennis court light poles to 40 feet. The pool canopy, lower in height and reduced in size, is no longer visible in this view.

See Figure II-15 on following page(s).



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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-15
Valley Spring Lane Elevations

25. Page II-37, Figure II-16, *Valley Spring Lane and Whitsett Avenue Elevations*, is updated to show the removal of a formerly visible field light pole in Elevation (F), the increase in heights of Field B light poles to 80 feet and decrease in tennis court lights to 40 feet.

    See Figure II-16 on following page(s).

26. Page II-38, Figure II-17, *Whitsett Avenue Elevations*, is updated to show the removal of a visible field light pole in Elevation (B), reduction in visible tennis court light poles to 40 feet, and the increase in heights of Field A light poles to 80 feet.

    See Figure II-17 on following page(s).

27. Page II-39, Figure II-18, *Bellaire Avenue and Zev Yaroslavsky Greenway Elevations*, is updated to show the increase in height in the Field B light poles to 80 feet and the removal of a visible field light pole in Elevation (A).

    See Figure II-18 on following page(s).

28. Page II-44, Figure II-23, *Rendering – North Facing View from Field B*, is updated to show the removal of a field light pole in the central section of the field, the increase in height of the remaining field light pole, and the reduction in bleacher seats.

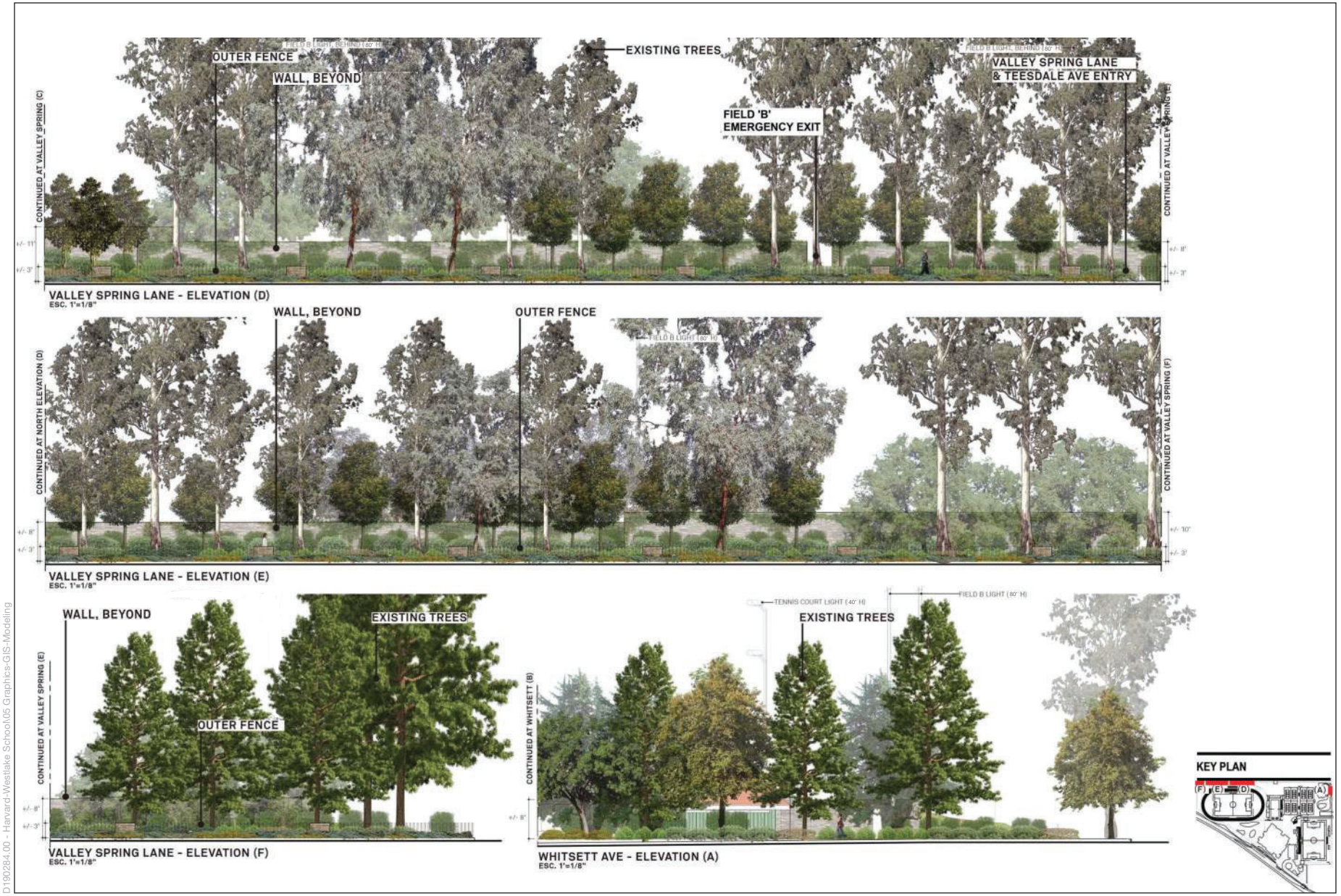
    See Figure II-23 on following page(s).

29. Page II-46, Figure II-25, *Rendering of the ~~Southwestern~~ Southeastern Corner of the Gymnasium and Community Room*, the figure title is updated to reflect the correct location as "southeastern." The figure is also updated to remove the metal louvers and glass from the south facing gymnasium façade, thus, creating a solid building wall.

    See Figure II-25 on following page(s).

30. Page II-48, Subsection (1), Athletic and Recreational Activity, add the below sentence to the end of the 1st paragraph as follows:

Non-athletic School activities, including incidental academic uses, such as science labs, bird watching, meetings, and classes at the Project Site on school days during the school year would not begin before 9:00 a.m. or take place later than 8:00 p.m. outdoors or 9:30 p.m. indoors, Monday through Friday. On federal holidays, no School activities, athletic or otherwise, would begin before 9:00 a.m. or take place later than 3:00 p.m. The School's academic uses occurring outdoors or in the gymnasium will not interfere with the potential for public use of athletic facilities.



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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-16
Valley Spring Lane and Whitsett Avenue Elevations

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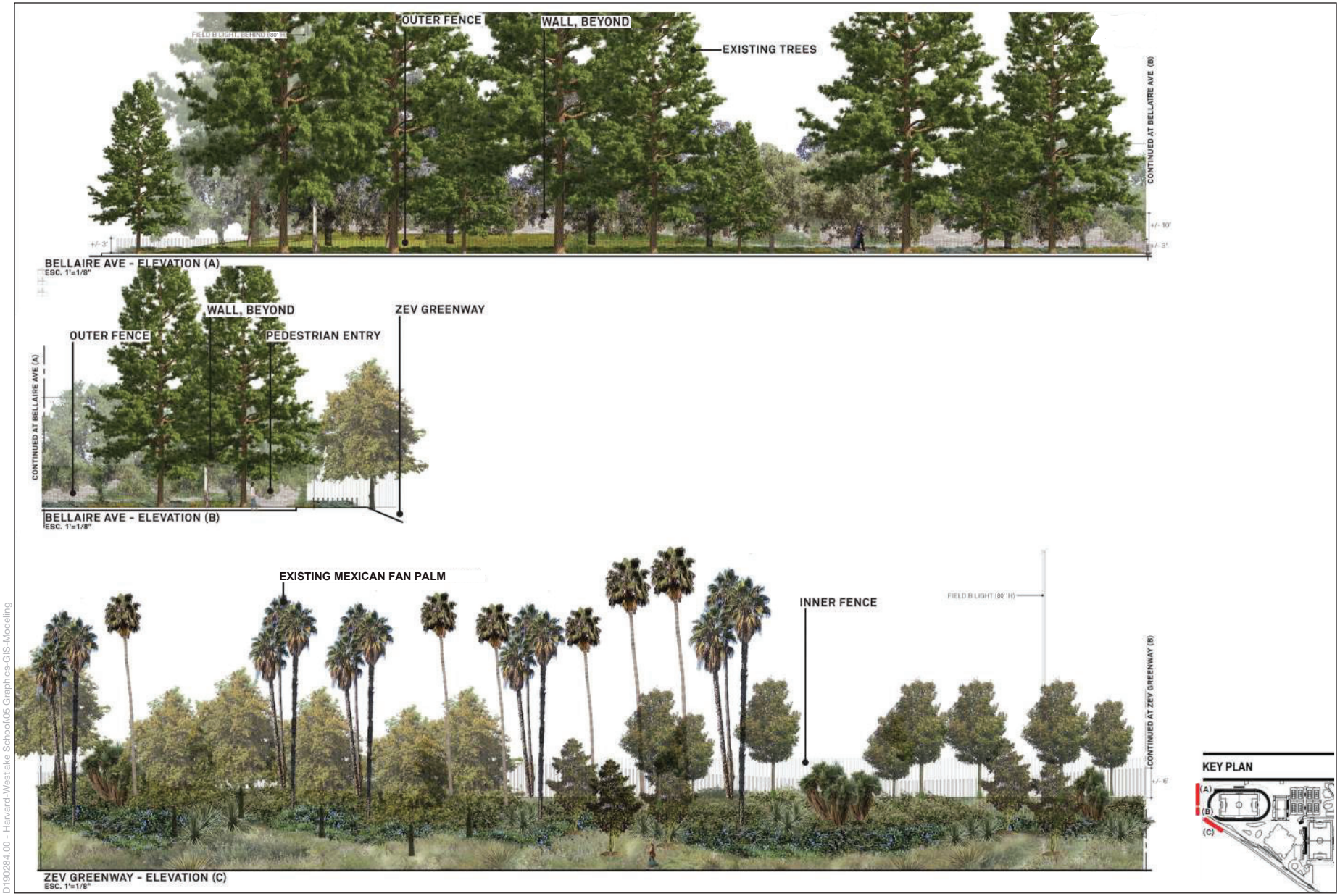
SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-17
Whitsett Avenue Elevations



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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-18
Bellaire Avenue and Zev Yaroslavsky Greenway Elevations

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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-23
Rendering - North-Facing View from Field B

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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-25
Rendering of the Southeastern Corner of the Gymnasium and Community Room

31. Page II-52, Subsection c), Landscaping, add the below sentence within the last two sentences of the first partial paragraph as follows:

A single coast live oak, a significant-protected tree and located in the Zev Greenway, would remain in place. The three pine trees within the area proposed for the Coldwater Canyon Avenue Riverwalk Path Ramp would also remain in place. In addition, of the 240 trees to be removed, 31 trees would be removed from the public right-of-way (the majority of which are Mexican fan palms).

32. Page II-52, Subsection c), Landscaping, modify the 2nd sentence of the 1st full paragraph as follows:

In aggregate, the 240 removed trees would be replaced by ~~350~~ 393 California native trees.

33. Page II-53, Subsection (2) Vehicle Access and Parking, modify the 1st sentence in the 3rd paragraph in this subsection as follows:

The underground parking structure, which would contain ~~503~~ 386 vehicle parking spaces, as well as 28 long-term bicycle parking spaces, is illustrated in **Figure II-26**, *Below Grade Plan for the Project*.

34. Page II-53, Subsection (2) Vehicle Access and Parking, modify the 4th sentence in the 5th paragraph as follows:

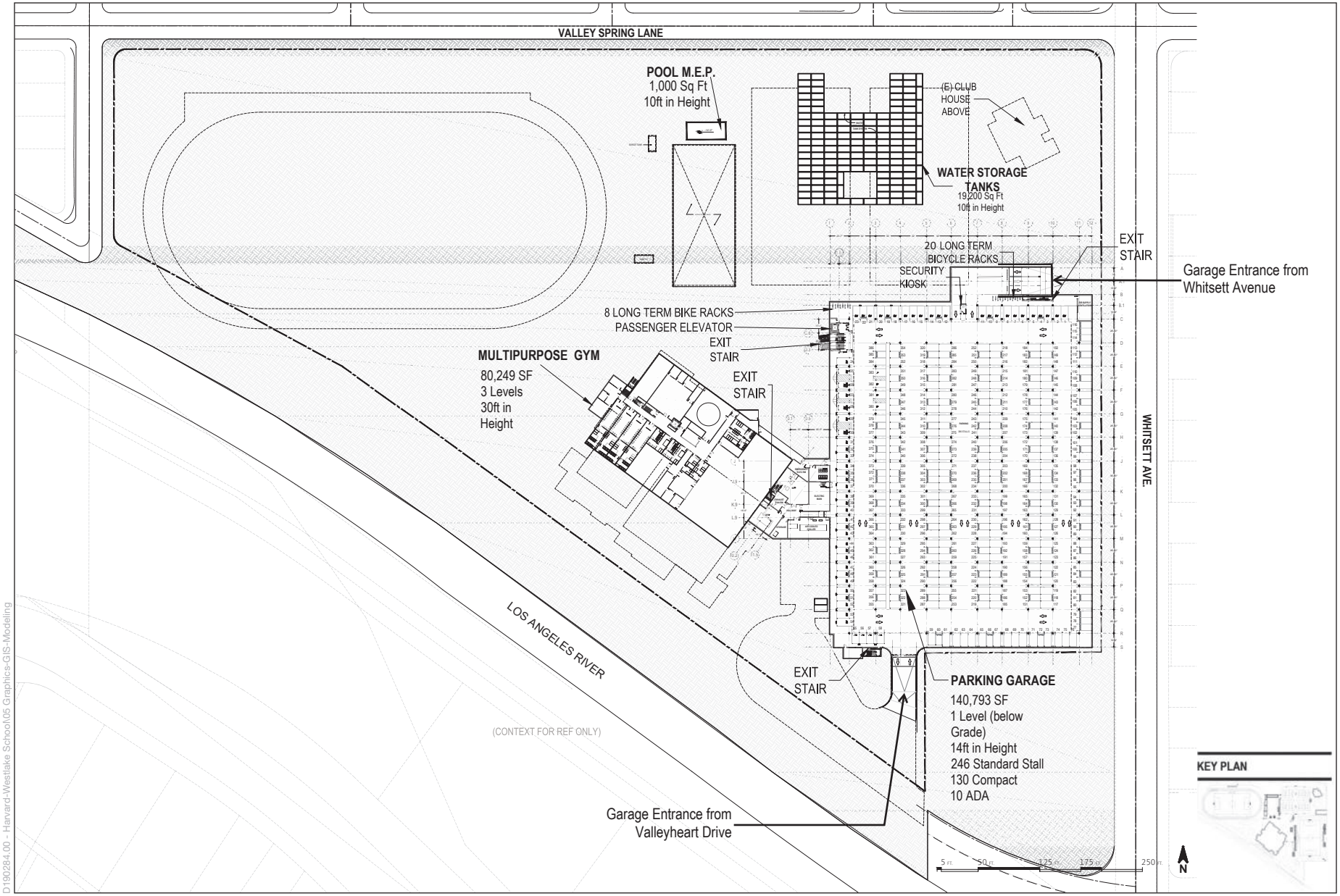
The roundabout would lead to a ~~29-space~~ 17-space, short-term surface parking lot near the parking structure's southern entrance.

35. Page II-54, Figure II-26, *Below Grade Plan for the Project*, is updated to show the Project's reduced subterranean parking spaces and size of the structure, including the increased setback of the building footprint relative to the gymnasium and property line. The figure is also updated to show the removal of the tennis stairs and elevator and the reduction in size of the stormwater capture system.

    See Figure II-26 on following page(s).

36. Page II-55, Subsection (2), Vehicle Access and Parking, modify the 2nd sentence in the 1st paragraph to clarify that only one of the driveways on Valleyheart Drive is used for egress by LAFD as follows:

This warning light would be activated by a remote-control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from ~~one of the two~~ the eastern LAFD driveway~~s~~ on Valleyheart Drive.



SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-26
Below Grade Plan for the Project

37. Page II-55, Subsection (2) Vehicle Access and Parking, modify the 4th paragraph as follows:

LAMC Section 12.21 A.4 requires at least one automobile parking space for each five seats contained within any theatre, church, high school, college or university auditorium, or general auditorium, stadium or other similar place of assembly. Table II-6, Required Parking Per LAMC Section 12.21 A.4, provides a breakdown of the required parking for the Project. As shown in Table II-6, the Project would provide a total of ~~532~~ 403 vehicle parking spaces, ~~88~~ two spaces more than required.

38. Page II-56, Subsection (2) Vehicle Access and Parking, modify Table II-6, *Required Parking Per LAMC Section 12.21 A.4*, as follows:

TABLE II-6
REQUIRED PARKING PER LAMC SECTION 12.21 A.4

Building/Use	Number of Fixed Seats	Number of Automobile Parking Spaces Required[a]
Multipurpose Gymnasium	~~1,026~~ 1,056	~~205~~ 211
Tennis Courts	~~100~~ 84	~~20~~ 17
Field A	~~488~~ 542	~~98~~ 108
Field B	~~255~~ 109	~~51~~ 22
Pool	~~348~~ 214	~~70~~ 43
Total Number of Seats and Parking Required	**~~2,217~~ 2,005**	**~~444~~ 401**

[a] LAMC Section 12.21 A-4 requires one parking space per five seats for auditoriums, stadiums, and general places of assembly.

SOURCE: ESA, ~~2020.~~2023

39. Page II-57, Subsection e) Lighting and Signage, modify the 2nd through 5th paragraphs of the subsection as follows:

As shown in Figure II-27, Field A would utilize ~~six~~ four ~~70-~~ 80-foot-tall sports field light poles, ~~three~~ two along the east sideline and ~~three~~ two along the west sideline. A 25-foot x 8-foot LED scoreboard (that will not include a display video), reaching a maximum height of 21 feet when combined with approximately 10-foot support poles and 3-foot lettering and donor signage on top of the scoreboard, would be installed along the southern edge of the field.

Field B would utilize ~~seven~~ four sports field light poles ~~at varying heights~~ each at 80 feet in height, which include~~: three poles along the south sideline (two 60-foot poles and one 70-foot pole) three 80-foot-tall poles along the north sideline; and one 60-foot-tall light pole on the east edge of the field~~ two poles each along the north and south sidelines. The same LED scoreboard as included for Field A would be installed along the western

edge of Field B (this this scoreboard would also not include a display video). The LED signs would comply with LAMC Section 14.4.4 requirements, which limit light intensity from signage to no more than three foot-candles above ambient lighting at residential property boundaries.

Lighting in the pool area would include ~~two~~ four ~~60-~~ 55-foot-tall pool light fixtures, ~~one each~~ with two lights each along the ~~southe~~astern and ~~south~~western sides of the pool. ~~Also, 12 pool lights would be mounted within the proposed 30-foot-tall pool canopy, under the northeast and northwest sides of the canopy, and ranging in height between 21 feet and 28 feet.~~ In addition, an 18-foot x 10-foot scoreboard at 12 feet above grade would be mounted underneath and shielded by the canopy in the pool area.

Lighting for the tennis courts would include ~~three~~ new 40-foot-tall court lights along ~~each of~~ the four edges of the courts, for a total of ~~12~~ 10 light poles.

40. Page II-58, Figure II-27, *Light and Signage Plan for the Project*, is updated to show removed and relocated light poles, consistent with the overall reduction in the Project's lighting program and changes in light pole heights. It is also updated to show revisions to the number of bleacher seats throughout the Project Site and reduction in the size of the pool canopy.

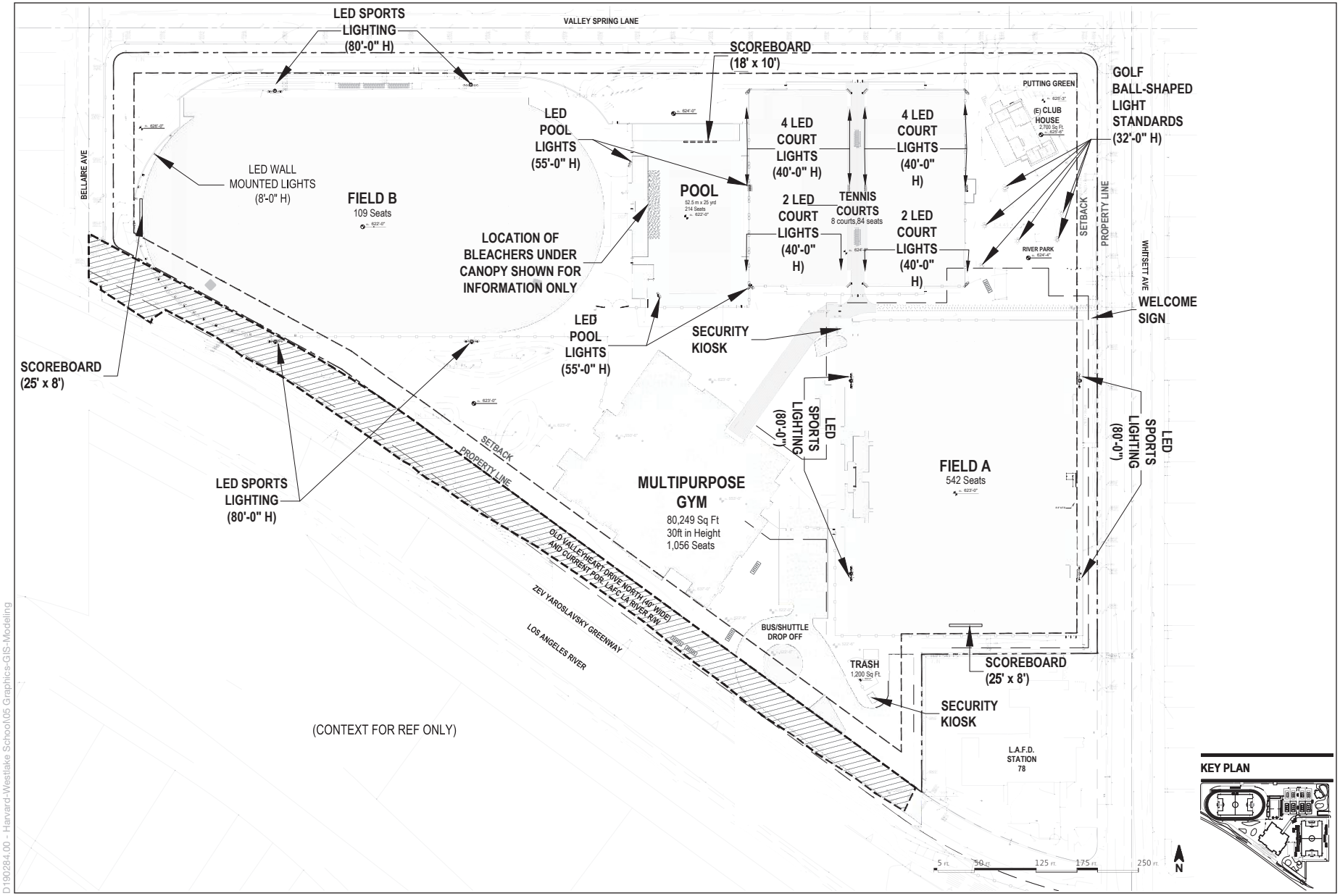
    See Figure II-27 on following page(s).

41. Page II-59, Subsection e) Lighting and Signage, modify the last sentence of the 1st paragraphs as follows:

The Project Site would include a total of ~~45~~ 28 light poles, including the six relocated golf ball-shaped light standards.

42. Page II-60, Subsection g) Sustainability Features, modify the 2nd paragraph through the 1st bullet point as follows:

Project would also include ~~426~~ 379 roof-top solar panels on the gymnasium building, energy from which would be stored and used to reduce reliance on electricity. The underground and at-grade parking areas would include free electric vehicle charging stations, and lighting would consist of energy-efficient LED fixtures.



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SOURCE: Gensler 2022

Harvard-Westlake River Park Project

Figure II-27
Light and Signage Plan for the Project

The Project also proposes an underground stormwater capture and reuse system in the northeastern portion of the Project Site to treat water that is collected on-site, per the requirements of the City's Low Impact Development (LID) Ordinance (Ordinance No. 183,833), which amended LAMC Section 64.07~~, as well as water collected from the 39-acre residential neighborhood to the north of the Project Site. Currently, during rainfall events and with dry weather flows (such as residential landscape irrigation and car washing), untreated and polluted water flows from this residential neighborhood to an inlet that directs water into the Los Angeles River. Via a new curb inlet at the southwestern corner of Whitsett Avenue/Valley Spring Lane intersection, the Project would intercept runoff from this neighborhood and direct it to the Project Site stormwater capture and reuse system where it would be treated~~. Following treatment, reclaimed water would be stored in an underground cistern with a total capacity of ~~1 million~~ approximately 350,000 gallons. The reclaimed water would be used for irrigation within the publicly accessible 5.4 acres (235,224 square feet) of walking paths and wooded areas~~, as well as for the Project's water features~~. If capacity in the underground cisterns were reached, stormwater ~~flowing from the residential neighborhood to the north of the Project Site~~ would continue to be collected and treated before being discharged back onto Whitsett Avenue where it would flow into the Los Angeles River. Figure II-26 illustrates the location of the ~~1-million-~~approximately 350,000-gallon capacity, below ground storage tanks.

~~Depending on rainfall frequency and volume, a minimum of one-third of the Project's total annual irrigation demand is expected to be provided by the proposed 1-million-gallon stormwater capture and reuse system. The installation of an underground water capture system and infrastructure improvements made to support this system on the surface level would also help to relieve the current flooding and drainage issues at the Whitsett Avenue and Valley Spring Lane intersection.~~ Stormwater captured and reused by the Project would be utilized for on-site irrigation purposes consistent with the City's LID Ordinance.

Other sustainable features are summarized as follows:

- Stormwater collection and treatment to collect rainwater and other ~~urban~~ runoff ~~not only at the corner of Whitsett Avenue and Valley Spring Lane but~~ throughout the Project Site and proposed building roofs; rainwater from parking areas to drain to the landscape areas for storage;

43. Pages II-61 to II-62, Subsection 5. Anticipated Construction Schedule, modify the last two sentences on page II-61 which continues on page II-62 as follows:

Project development would disturb a majority of the Project Site (746,532 square feet)[17] and require excavation and grading of the Project Site to a maximum depth of approximately 21 feet for construction of the one-level subterranean parking structure, gymnasium basement, and proposed ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system. Rough grading cut volumes would be approximately ~~251,836~~ 199,000 cubic yards (unadjusted), and the fill volume would be approximately ~~1,836~~ 2,000 cubic yards (unadjusted), for a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted).

44. Page II-62, Subsection 5, Anticipated Construction Schedule, modify the 1st two sentences of the 1st full paragraph as follows:

During the first month of Project construction, with concurrent demolition and site preparation activities, 252 maximum daily haul truck trips would be generated, and during the subsequent grading and excavation phase, up to 300 haul truck ~~export~~ trips would be generated on peak haul days during the grading and excavation phase. These would consist of 150 empty inbound haul trips and 150 full outbound haul trips from the Project Site to the disposal site. Hauling hours are anticipated to begin at ~~8:00~~ 9:00 a.m. and continue to 4:00 p.m.

45. Page II-62, Subsection 6. Requested Permits and Approvals, modify the bullet points regarding light poles as follows:

- Light Poles: Pursuant to LAMC Section 12.24 F, the following maximum heights for light poles ancillary to the athletic and recreational campus, in lieu of the 30-foot height limit otherwise required by LAMC Section 12.21.1 A.
  - ~~Two~~ Four ~~60~~ 55-foot-tall light poles on the ~~southe~~ast and ~~south~~west sides of the pool facility.
  - ~~Three~~ Two 80-foot-tall light poles on the north side of Field B.
  - ~~One 60-foot-tall light pole on the east side of Field B.~~
  - Two ~~60-~~ 80-foot-tall light poles on the south side of Field B.
  - ~~One 70-foot-tall light pole on the south side of Field B.~~
  - ~~Three~~ Four ~~70~~ 80-foot-tall light poles on the west and east sideline~~s, and three 70-foot-tall light poles on the east sideline,~~ of Field A.
  - ~~Twelve~~ Ten 40-foot-tall light poles located on all four sides of the proposed tennis courts.

46. Page II-63, Subsection 7. Responsible Public Agencies, modify the 1st sentence of the paragraph as follows:

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of it, but which has not been designated the Lead Agency (State of California CEQA Guidelines Section 15381).

3. Section IV.A. Aesthetics

1. Page IV.A-2, Subsection d) Light and Glare, modify the 1st sentence of 4th paragraph and add two sentences as follows:

The analysis of Project impacts related to light and glare is in part based on the Lighting Technical Report (Lighting Report) prepared by StudioK1, October 2021.[1] The Lighting Report is provided as Appendix B of this Draft EIR. The Project's modified lighting

program and effects of the design modifications are evaluated in detail in Appendix B.1, *Supplemental Lighting Report Memorandum* (Supplemental Lighting Report), and in Appendix B.2, *Supplemental Lighting Report Appendix*, of this Final EIR, both prepared by StudioK1. The analysis of the Project's lighting impacts in this section have been updated to reflect the findings of the Supplemental Lighting Report.

2. Page IV.A-12, Subsection b) Methodology, add the below paragraph and revise the 1st paragraph on the page as follows:

The analysis of Project impacts related to light and glare is in part based on the Lighting Technical Report (Lighting Report) prepared by StudioK1, October 2022. The Lighting Report is provided as Appendix B of this Draft EIR. The Project's modified lighting program and effects of the design modifications are evaluated in detail in Appendix B.1, *Supplemental Lighting Report Memorandum* (Supplemental Lighting Report), and in Appendix B.2, *Supplemental Lighting Report Appendix*, of this Final EIR, both prepared by StudioK1. The analysis of the Project's lighting impacts in this section have been updated to reflect the findings of the Supplemental Lighting Report.

The Project's modeled sports lighting levels included in the Supplemental Lighting Report did not account for the landscape conditions occurring between the Project Site and the Zev Greenway changes in elevation, the preservation of most of the existing trees along the Project Site's property lines, or the addition of significant new landscaping to be undertaken as part of the Project. The numerous trees and dense landscaping along the property line in proximity to the Zev Greenway would likely block the line-of-sight between the light source and the Zev Greenway trail, with a similar effect at the residential neighborhoods immediately to the west, north, and east of the Project Site. As such, these conditions would work to shield the Project lighting and lower the foot candle levels at the property line beyond those included in the Supplemental Lighting Report. As such, the Supplemental Lighting Report represents a conservative analysis of Project impacts.

3. Page IV.A-13, Subsection (a) Proposed Lighting Program, modify the 2nd to last sentence on the page as follows:

This vehicle entrance area would also accommodate ~~29~~ 17 surface parking spaces.

4. Pages IV.A-14 to IV.A-15, Subsection (a) Proposed Lighting Program, modify the 3rd full paragraph through the 2nd full paragraph on page IV.A-15 as follows:

As shown in Figure II-27, above, Field A would utilize ~~six~~ four ~~70-~~ 80-foot-tall field light poles, ~~three~~ two along the east sideline and ~~three~~ two along the west sideline. A 25' x 8' LED scoreboard (that would not include a display video), reaching a maximum height of 21 feet when combined with approximately 10-foot support poles and 3-foot lettering and donor signage on top of the scoreboard, would be installed along the southern edge of the field.

Field B would utilize ~~three, 60- to 70-foot-tall field light poles along the south sideline (from east to west, 60', 70' and 60'); three, 80-foot-tall field light poles along the north sideline; and a single 60-foot-tall~~ four 80-foot-high field light poles, with two light poles each along ~~the eastern edge~~ northern and southern edges of the field. The same LED scoreboard as included for Field A would be installed along the western edge of Field B (this scoreboard would also not include a display video). The LED signs would comply with LAMC Section 14.4.4 requirements, which limit light intensity from signage to no more than 3 foot candles above ambient lighting at residential property boundaries.

Lighting in the pool area would include ~~two~~ four, ~~60-~~ 55-foot-tall sports light fixtures, ~~one~~ two each along the ~~south~~eastern and ~~south~~western sides. ~~lines, and 12 lights mounted within the 30-foot-tall canopy, under the northeast and northwest sides of the canopy and ranging in height between 21 feet and 28 feet.~~ In addition, an 18' x 10' scoreboard at 12 feet above grade would be mounted underneath and shielded by the canopy in the pool area.

Lighting for the tennis courts would include ~~three~~ a total of ten new 40-foot-tall court lights along the four edges of the courts~~, for a total of 12 light poles~~. Note that under the Project, the number of tennis courts would be reduced from sixteen to eight and relocated farther from the Zev Greenway and Los Angeles River. The six existing golf ball-shaped light standards between the existing Weddington Golf & Tennis parking lot and the driving range would be relocated to the west and southwest sides of the clubhouse. The golf ball-shaped light standards would be retrofitted from driving range floodlights into pedestrian area lights using new LED sources with glare control (redirection) and reduction from 1,000 watts per fixture to a maximum of 50 watts per fixture. The Project Site would include a total of ~~45~~ 28 light poles, including the six relocated golf ball-shaped light standards. Of the ~~45~~ 28 light poles, ~~33~~ 22 would exceed the 30-foot maximum height limit established by the Property's zoning requirements.

The ~~Musco~~ Project's ~~Lighting~~ lighting fixtures ~~for the Project~~ are specifically designed with precise optics and integral shields to aid in controlling the light and preventing unwanted spill light, uplight, or glare. The Light Control Visor is specifically engineered such that the light from the fixture can reach the destination surface, in this case athletic fields, a pool, or tennis courts, while the edges of the visor block any high angles, which would otherwise impact neighboring sites. Additionally, the ~~Musco~~ Project's lighting fixtures are designed to be tilted downward toward the target which further enhances effectiveness of the Light Control Visor. By contrast, the existing fixtures on the Project Site have no integral shielding and a more generic optical pattern common to floodlighting. Many of the existing fixtures use legacy lamp sources, induction and metal halide, with internal fixture optics around the lamp to control the beam pattern. Due to the size of the lamps in the fixtures, controlling the light is less precise than when a small point source, such as LED, is used. Additionally, the lamp itself is directly visible with no optical control, which contributes to the perceived glare. Finally, these fixtures are tilted upward to cast the lighting across the intended area to maximize their effectiveness, but this further exposes the lights to the surrounding receptors and is the primary source of glare found during the survey.

5. Pages IV.A-15 and IV.A-16, Subsection (a) Proposed Lighting Program, modify the 4th and 5th sentences of the 4th paragraph on page IV.A-15, which continues to page IV.16, as follows:

Light increases from the Project would not result in a substantial change in the character of the ambient light or sky glow in the existing developed region and would produce a glow over a smaller area as compared to existing conditions (as can be seen by the extent of the contour lines in Figure 5, Existing Off-Site Illuminance, and Figure 8, Off-Site Illuminance, of the Supplemental Lighting Report). As shown in Figure 5, the existing Weddington Golf & Tennis facility produces measurable lighting within the surrounding area between 0 and 1 footcandles.

6. Pages IV.A-16 and IV.A-17, Subsection (b) Evaluation of Off-Site Luminance, modify the 1st and 2nd paragraphs of this subsection as follows:

The analysis provided in Table 2 (Summary of Calculated Off-Site Illuminance) of the Supplemental Lighting Report (see Appendix B.1 of ~~this~~ ~~Draft~~ the Final EIR) indicated that light spill at the property line of all the residential properties surrounding the Project Site would be well within the LAMC maximum of 2.0 foot candles of light, with a range of 0.00 to 0.06 horizontal foot candles and 0.00 to 0.09 vertical foot candles. Figure 8 (Off-Site Illuminance) in the Supplemental Lighting Report also illustrates these results. The spill lighting from existing fixtures is illustrated in Figure 5 (Existing Off-Site Illuminance) of the Supplemental Lighting Report. As shown therein, spill lighting from existing lighting conditions extends further into the surrounding areas when compared to the Project's lighting conditions.

As indicated above, per LAMC Section 13.17 F, the RIO District Ordinance requires all site and building mounted lighting to be designed such that it produces a maximum initial luminance value no greater than 0.20 horizontal and vertical foot candle at the site boundary, and no greater than 0.01 horizontal foot candle 15 feet beyond the site. As analyzed in the Supplemental Lighting Report, lighting generated by the Project would be a maximum of 0.0~~6~~5 horizontal and 0.0~~7~~2 vertical foot candles along the Project Site boundary within the RIO District, and 0.0~~1~~0 horizontal foot candle 15 feet beyond the Project Site in the RIO District. The location on the Zev Greenway/Project Site boundary was selected for the analysis because it is the point that is closest to a Project sports lighting pole location and, therefore, the most likely to be impacted. In this case, the location is proximate to the southwest pole for Field B. Lighting impacts in all other areas along the Zev Greenway would be less affected and, as such, the evaluated location represents the "worst case scenario." Thus, the Project would comply with the lighting requirements of the RIO District Ordinance. The modeled lighting levels included in the Supplemental Lighting Report did not account for the numerous trees and dense landscaping along the property line in proximity to the Zev Greenway or berms for landscape massing. As such, these conditions would work to shield the lighting and lower the foot candle levels at the property line beyond those included in the Supplemental Lighting Report. The effects of the Project on off-site illuminance are summarized in **Table IV.A-1**, *Summary of Calculated Off-Site Illuminance,* below.

7. Page IV.A-17, Subsection (a) Proposed Lighting Program, modify Table IV.A-1, *Summary of Off-Site Illuminance*, as follows:

TABLE IV.A -1
SUMMARY OF CALCULATED OFF-SITE ILLUMINANCE[A]

Receptor (*=Sensitive)	Location	Project Illuminance (foot candles)		LAMC/RIO Threshold (foot candles)		LAMC-Compliant
		Horizontal	Vertical	Horizontal	Vertical	
1*	4155 Bellaire Avenue	0.00	~~0.02~~ 0.01	2.00	2.00	YES
2*	4202 Bellaire Avenue	~~0.04~~ 0.02	~~0.09~~ 0.05	2.00	2.00	YES
3*	4202 Beeman Avenue	~~0.03~~ 0.02	~~0.07~~ 0.05	2.00	2.00	YES
4*	12501-12509 Valley Spring Lane	0.00	0.00	2.00	2.00	YES
5*	4122 Whitsett Avenue	~~0.05~~ 0.01	~~0.09~~ 0.03	2.00	2.00	YES
6*	4068 Whitsett Avenue	~~0.02~~ 0.00	~~0.06~~ 0.00	2.00	2.00	YES
7	4203 Babcock Avenue	0.00	0.00	2.00	2.00	YES
8	4202 Babcock Avenue	0.00	0.00	2.00	2.00	YES
9	4110 Whitsett Avenue	0.06	0.09	2.00	2.00	YES
10	4108 Whitsett Avenue	0.03	0.08	2.00	2.00	YES
11	4104 Whitsett Avenue	0.01	0.03	2.00	2.00	YES
12	4100 Whitsett Avenue	0.01	0.01	2.00	2.00	YES
RIO District	RIO District at property line	~~0.06~~ 0.05	~~0.07~~ 0.02	0.20	0.20	YES
	RIO District at 15 feet beyond property	~~0.01~~ 0.00	~~0.02~~ 0.00	0.01	n/a	YES

NOTE:

[a] Illuminance refers to the amount of light falling onto a given surface area. It is measured in foot candles (e.g., the amount of light that hits the street below a street light or other light source).

SOURCE: StudioK1, Supplemental Lighting ~~Technical~~ Report, Table 2, ~~October 2021~~July 2022.

8. Page V.A-18, Subsection (b) Evaluation of Off-Site Luminance, modify the last sentence of 2nd full paragraph as follows:

Due to either the long distance or steep viewing angle, the illumination effects of these signs would be nearly nonexistent at the sensitive receptors resulting in no exceedance of LAMC Section ~~91.6205 M~~ 14.4.4 E requirement, which limits light intensity from signage to no more than 3 foot candles above ambient lighting at residential property boundaries.

9. Pages IV.A-19 and IV.A-20, Subsection (b) Glare Impacts, (ii) Operation, modify the 2nd paragraph of this subsection as follows:

Operation of the Project would require the development of a lighting program that would potentially increase nighttime glare (or luminance) over existing conditions. Musco Lighting provided a second calculation set that evaluated the glare produced by the fixtures at any given point on and off the Project Site, including at the sensitive receptors. ~~Figure 9 (Off-Site Luminance)~~ PDF page 18 of 37 in the Supplemental Lighting Report Appendix (see Appendix B.2 of ~~this Draft~~ the Final EIR) illustrates the ~~13 receptor sites and the~~ calculated values in candela across the Project Site and surrounding vicinity. Each point on this grid reflects the max candela value for the fixture with the highest potential for glare at any given pole on the Project Site. This represents what a user might perceive as the brightness, or point intensity, of a lighting fixture when directly viewed from a distance and coincides with the methods of evaluation used to survey existing facilities. Following methods prescribed by The Illuminating Engineering Society, the ~~Musco~~ Project ~~Lighting~~ lighting values for candela can be adjusted to candela per square meter as would be perceived by each receptor location. As shown in Table 3 of the Supplemental Lighting Report, the Project would result in reductions in glare at most of the off-site residences. For example, the values at 4068 Whitsett Avenue would be reduced from 3,500 cd/m^2 under existing conditions to approximately ~~5.8~~ 0.7 cd/m^2 following Project construction. In other words, the new lighting system should generally produce substantially less candela, or glare, than the existing lighting. Modeled candela per square meter calculations for one receptor (4202) Bellaire Avenue increase slightly as compared to existing conditions, though the increase is approximately equivalent to the brightness of a single candle flame in front of the property. Further, as previously stated, the modeled measurements do not take into consideration substantial intervening Project landscaping, which would result in a greater reduction in glare at all receptors.

10. Page IV.A-20, Subsection (b) Glare Impacts, (ii) Operation, modify Table IV.A-2, *Summary of Off-Site Luminance*, as follows:

TABLE IV.A-2
SUMMARY OF CALCULATED OFF-SITE LUMINANCE[a]

Receptor[b] (*=Sensitive)	Location	Glare Intensity (cd/m^2)	
		Existing	Project[c]
1*	4155 Bellaire Avenue	550	~~3.3~~ 4.1
2*	4202 Bellaire Avenue.	0	~~7.7~~ 6.4
3*	4202 Beeman Avenue	230	~~7.4~~ 6.9
4*	12501-12509 Valley Spring Lane	720	~~0.1~~ 0.2
5*	4122 Whitsett Avenue	1,500	~~5.0~~ 6.3
6*	4068 Whitsett Avenue	3,500	~~5.8~~ 0.7
7	4203 Babcock Ave.	900	~~1.1~~ 2.2
8	4202 Babcock Ave.	3,200	~~0.5~~ 0.2
9	4110 Whitsett Ave.	2,500	~~5.4~~ 7.1
10	4108 Whitsett Ave.	2,350	~~5.2~~ 7.2
11	4104 Whitsett Ave.	2,400	~~5.8~~ 4.9
12	4100 Whitsett Ave.	3,700	~~2.5~~ 1.3
RIO	RIO at property line	4,375	~~13.6~~ 3.9
	RIO at 15-feet beyond property	4,375	~~4.0~~ 1.7

NOTES:

[a] Luminance is the amount of light passing through an object, emits from, or reflects off an object. It is expressed in candela per square meter (e.g., The amount of light that passes through the street light.) It is often referred to as glare.

[b] Views at Receptor Locations 1 to 6 are obstructed/limited by landscaping between receptor and Project Site.

[c] Calculated values do not account for landscaping (existing or proposed).

SOURCE: StudioK1, Supplemental Lighting Technical Report, Table 3, ~~October 2021~~July 2022.

11. Page V.A-21, Subsection e) Cumulative Impacts, (1) Impact Analysis, modify the 5th sentence of 1st paragraph as follows:

The related projects would be consistent with existing ambient conditions, including illuminated signage along Ventura Boulevard and, as with the Project, would be required to comply with LAMC Section ~~91.6205 M~~ 14.4.4 E that requires that no sign shall be illuminated in such a manner as to produce a light intensity of greater than three-foot candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

4. Section IV.B. Air Quality

1. Page IV.B-14, Subsection (i), Air Quality Management Plan and Regional Transportation Plan/Sustainable Communities Strategy, modify the last paragraph as follows and add the new paragraphs below after the last paragraph and before Subsection (ii) SCAQMD Air Guidance Documents.

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated State implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable future State GHG reduction targets of 19 percent. The 2020-2045 RTP/SCS ~~will be~~ is incorporated into the ~~forthcoming~~ 2022 AQMP.

The SCAQMD adopted the 2022 AQMP on December 2, 2022, in response to the USEPA's new NAAQS for the 8-hour ozone standard (70 parts per billion). The 2022 AQMP includes strategies to ensure that approaching attainment deadlines[20b] for O_3 and PM2.5 are met, and that public health is protected to the maximum extent feasible. The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives and oceangoing vessels. These strategies are to be implemented in partnership with CARB and USEPA. The future emissions inventories in the 2022 AQMP, which are based on SCAG's 2020-2045 RTP/SCS, project a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and an 8 percent growth in VMT between 2018 and 2037. Appendix IV-C of the 2022 AQMP contains the RTP/SCS and Transportation Control Measures.

[20b] The South Coast Air Basin was reclassified as extreme non-attainment and must attain the standard by August 2038. The 2022 AQMP shows attainment of the 2015 8-hour ozone standard by 2037.

[20c] SCAG, Final 2020-2045 RTP/SCS, 2020. https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020.

2. Page IV.B-20, Subsection (1) Regional Context, add the below after the last paragraph and before Subsection (a) Criteria Pollutants.

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies and low NOx technologies), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard, the most stringent standard to date. Due to high levels of ozone in the Air Basin, meeting the 2015 federal ozone standard requires reducing emissions of NO_X by 67 percent more than is required by adopted rules and regulations in 2037. Achieving this level of reduction is expected to require extensive use of zero emission

(ZE) technologies across stationary and mobile sources. This reduction would require that sources of emissions be controlled as stringently as possible and the use of flexible "black box" measures as provided in Section 182(e)(5) of the CAA, which means the development and deployment of future technologies to reduce emissions as well as the reduction of NOx from sources regulated by the federal government such as aircraft, locomotives and oceangoing vessels.[29b] These strategies are to be implemented in partnership with CARB and USEPA. With implementation of these control strategies, the ozone standard can be achieved in 2037.

The 2022 AQMP includes 49 control measures; 31 measures target stationary sources under residential, commercial and large industrial combustion and 18 measures target mobile sources. The two key areas for incentive programs are (1) promoting widespread deployment of available ZE and low NO_X technologies and (2) developing new ZE and ultra-low NO_X technologies. However, the 2037 NO_X limit is 60 tons per day and emissions from federal and international sources are estimated to be 85 tons per day in 2037; thus, federal sources alone would emit more than the 60 tons per day limit in 2037. The SCAQMD and CARB cannot sufficiently reduce NO_X emissions to meet the standard without federal action.

[29b] SCAQMD, 2022. Draft Final 2022 Air Quality Management Plan, November 18. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/draft-final-2022-aqmp/dfaqmp.pdf?sfvrsn=13. Accessed April 10, 2022.

3. Page IV.B-26, Subsection (c), Existing Health Risk in the Surrounding Area, add the below to end of the 1st partial paragraph:

The American Lung Association publishes an annual State of the Air report. The State of the Air 2022[40b] report ranked Los Angeles County the 16th most polluted county in the United States for daily PM and annual PM, driven in large part by the increasing number and size of wildfires. Los Angeles County ranked 3rd as most polluted county in the United States from ozone. However, Los Angeles County experienced fewer bad air days on average from 2018 – 2020 versus 2017–2019.

[40b] American Lung Association, 2022. State of the Air 2022. Available: https://www.lung.org/getmedia/74b3d3d3-88d1-4335-95d8-c4e47d0282c1/sota-2022.pdf. Accessed June 2022.

4. Page IV.B-30, Subsection a) Thresholds of Significance, modify the 2nd paragraph on page IV.B-30 as follows:

Consistency with Applicable Air Quality Plans. CEQA Guidelines Section 15125 requires an analysis of project consistency with applicable governmental plans and policies. In accordance with the SCAQMD's CEQA Air Quality Handbook, the following criteria were used to evaluate the Project's consistency with the SCAQMD's 2016 AQMP, 2022 AQMP, and the City's General Plan Air Quality Element:

5. Page IV.B-31, Subsection a) Thresholds of Significance, modify the 1st paragraph on page IV.B-31 as follows:

The Project's potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 AQMP, 2022 AQMP, and applicable City General Plan Air Quality Element plans and policies.

6. Page IV.B-34, Subsection (2) Consistency with Air Quality Management Plan, revise the paragraph before Subsection (3) Consistency with General Plan – Air Quality Element, as follows:

The SCAQMD is required, pursuant to the CAA, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment of the NAAQS (e.g., O_3 and PM2.5).[53] The SCAQMD's 2016 and 2022 AQMP's contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving the five NAAQS related to these pollutants, including transportation control strategies from both SCAG's 2016-2040 and 2020-2045 RTP/SCS designed to reduce VMT.[54] The 2016 and 2022 AQMP control strategies were developed, in part, based on regional growth projections prepared by SCAG through ~~2040~~ 2045.[55] For this reason, projects whose growth is consistent with the assumptions used in the 2016-2040 and 2020-2045 RTP/SCS will be deemed to be consistent with the 2016 and 2022 AQMP's because their growth has already been included in the growth projections utilized in the formulation of the control strategies in the 2016 and 2022 AQMP's. Thus, emissions from projects, uses, and activities that are consistent with the applicable growth projections and control strategies used in the development of the 2016 and 2022 AQMP's would not jeopardize attainment of the air pollutant reduction goals identified in the AQMP's even if their emissions exceed the SCAQMD thresholds of significance.[56] As noted above, the 2016 and 2022 AQMP's ~~has~~ have been adopted by the SCAQMD and CARB. Therefore, this analysis considers consistency of the Project (see Chapter II, *Project Description*, of this Draft EIR for additional details) with the 2016 and 2022 AQMP's based on the AQMP's consistency with applicable growth projections and emission control strategies.

[56b] SCAQMD, 2022. Draft Final 2022 Air Quality Management Plan, November 18. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/draft-final-2022-aqmp/dfaqmp.pdf?sfvrsn=13. Accessed April 10, 2022.

[56c] SCAQMD, 1993. CEQA Air Quality Handbook, April, page 12-1.

7. Pages IV.B-36 and IV.B-37, Subsection (5) Construction Emissions Methodology, modify the last sentence of 2nd paragraph, which begins on page IV.B-36 as follows:

The Project would export approximately ~~250,000~~ 197,000 cubic yards of soil, approximately 10,590 cubic yards of demolition debris (asphalt, earthwork, and general construction debris) and approximately 6,532 cubic yards of site preparation debris (vegetation and minor earthwork).

8. Page IV.B-44, Subsection (a) SCAQMD CEQA Air Quality Handbook Policy Analysis, modify the last sentence in the first paragraph as follow:

The Projects potential impacts with respect to these criteria are discussed to assess the consistency with the SCAQMD's 2016 and 2022 AQMPs and applicable City General Plan Air Quality Element plans and policies.

9. Page IV.B-44 Subsection (i) Criterion 1, add the below following the 3rd paragraph in the subsection as follows:

The 2022 AQMP is the current SCAQMD-adopted management plan for continued progression toward clean air and compliance with State and federal requirements (it is not yet adopted by the USEPA for inclusion in the State Implementation Plan). It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources, and area sources. It builds upon measures already in place from previous AQMPs and includes a variety of new strategies (e.g., regulation, accelerated deployment of available cleaner technologies, best management practices, co-benefits from existing programs, incentives, etc.) to achieve the NAAQS. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD so as not to potentially increase the frequency or severity of an existing violation or cause or contribute to a new violation. Implementation of the Project would not interfere with air pollution control measures listed in the 2022 AQMP and therefore would not delay attainment of the air quality standards.

10. Page IV.B-44 Subsection (i) Criterion 1, modify the 4th paragraph as follows:

Therefore, in response to Criterion 1, the Project ~~could~~ would not potentially increase the frequency or severity of an existing violation or cause or contribute to new violations for ~~ozone based on the temporary construction localized exceedance of NO_x, which is an O_3 precursor~~ localized construction and operational emissions of NOx, CO, PM10, and PM2.5. **Accordingly, the Project would not delay ~~impacts regarding~~ the timely attainment of air quality standards or interim emission reductions specified in the AQMP ~~would be significant~~.**

11. Pages IV.B-44 and IV.B-45, Subsection (ii) Criterion 2, modify the 1st paragraph as follows:

With respect to the second criterion for determining consistency with AQMP growth assumptions, the projections in the 2016 and 2022 AQMPs for achieving air quality goals are based on assumptions in SCAG's 2016-2040 and 2020-2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of consistency with applicable population, housing, and employment growth projections and appropriate incorporation of AQMP control measures. The following discussion provides an analysis with respect to these measures.

12. Page IV.B-45, Subsection (a) Air Quality Management Plan Consistency, add the below after the last paragraph in the subsection and before Subsection (i) Construction Growth Projections.

With respect to the determination of consistency with the 2022 AQMP growth assumptions, the projections in the 2022 AQMP for achieving air quality goals are based on assumptions in the SCAG 2020–2045 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures (discussed under Section 2, Mitigation Measures, below); and (3) appropriate incorporation of AQMP land use planning strategies (discussed under Subsection (ii), Operations, below).

13. Page IV.B-46, Subsection (i) Construction Growth Projections, modify the last sentence in the first partial paragraph on the page as follows:

Therefore, the Project's construction jobs would not conflict with the long-term employment or population projections upon which the 2016 and 2022 AQMP's ~~is~~ are based. Impacts would be less than significant.

14. Page IV.B-46, Subsection (ii) Operations Growth Projections, modify the 1st sentence in the 1st paragraph as follows:

As discussed ~~in Section II., Project Description, of this Draft EIR~~ below, the Project's growth would fall within the growth projections contained in both the 2016-2040 and 2020-2045 RTP/SCS, which forms the basis of the growth projections in the 2016 and 2022 AQMPs, respectively.

15. Page IV.B-46, Subsection (ii) Operations Growth Projections, modify the 7th and 8th sentences in the 1st paragraph as follows:

Conservatively assuming 100 new employees based on days in which high attendance events do take place, this increase in employees would represent less than 0.0003 percent of the growth in employees projected for the City in both the 2016-2040 and 2020-2045 RTP/SCS ~~between 2020 and 2040~~. The Project would, therefore, also fall within the growth projections as contained in both the 2016-2040 and 2020-2045 RTP/SCS, and ultimately the growth projections in both the 2016 and 2022 AQMPs, since the growth would occur in a transit rich area, which would minimize potential growth in transportation-related emissions.

16. Page IV.B-46, Subsection (ii) Operations Growth Projections, modify the 2nd and 3rd sentences in the 2nd paragraph as follows:

The Project would not obstruct implementation of the 2016 and 2022 AQMP's, as discussed below under Thresholds (b), (c), and (d), since its regional construction and

operational emissions would be less than significant with implementation of feasible mitigation measures (discussed further below under the Mitigation Measures subsection), and its localized construction and operational emissions would be less than significant. **As a result, the Project would not conflict with the growth projections and control strategies used in the development in the 2016 and 2022 AQMP's. Impacts would be less than significant.**

17. Page IV.B-47, Subsection (i) Construction, add the below text after the 3rd sentence in the 1st paragraph as follows:

The Project's construction contractor would be required to comply with these regulatory control measures. As discussed above, the Project would temporarily exceed the NO_X threshold during construction which could potentially conflict with or obstruct implementation of the applicable AQMP. With implementation of Mitigation Measure AQ-MM-1, potential significant impacts would be reduced to less than significant. Therefore, the Project implements feasible air quality mitigation which reduces Project impacts to less than significant. As the achievement and maintenance of NAAQS and CAAQS is the goal of the 2022 AQMP, the Project would therefore not interfere with air pollution control strategies listed in the 2022 AQMP. **Compliance with these regulatory control measures would ensure the Project would not conflict with AQMP control strategies intended to reduce emissions from construction equipment and activities. Impacts would be less than significant.**

18. Page IV.B-47, Subsection (ii) Operations, modify the 1st and 2nd sentences in the 1st paragraph as follows:

The Project's location, design, and land uses would be consistent with both the 2016 and 2022 AQMPs during operations. As discussed above, the 2016 and 2022 AQMPs include ~~includes~~ land use and transportation strategies from both the SCAG 2016-2040 and 2020-2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions.

19. Page IV.B-48, Subsection (ii) Operations, modify the 4th full sentence of the 1st paragraph as follows:

This analysis provides evidence of the Project's consistency with both the 2016 and 2022 AQMP's goal of reducing mobile source emissions as a source of NOx and PM2.5.

20. Page IV.B-48, Subsection (ii) Operations, modify the1st sentence of the 2nd paragraph as follows:

Thus, the Project would not conflict with either the 2016 or 2022 AQMPs with respect to transportation control strategies from the 2016-2040 or 2020-2045 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions. Impacts would be less than significant.

21. Page IV.B-49, Subsection (b) General Plan Air Quality Element, modify the 4th and 5th sentences in the 2nd full paragraph as follows:

Transit service also includes Metro Bus Rapid Transit Line 750 and Local Lines 150/240 on Ventura Boulevard, which provide connection to the Metro B Line Universal City/Studio City Station, approximately 2.5 miles to the east. In addition, ~~The~~the Project would utilize a shuttle system between the School's Upper Campus and the Project Site whenever there are School activities underway at the Project Site, in order to encourage efficient transportation and reduce VMT associated with the Project.

22. Page IV.B-50, Subsection (b), General Plan Air Quality Element, after the 1st partial paragraph add the following:

Table IV.B-5A, *Consistency with Applicable Air Quality Policies of the General Plan*, provides a detailed assessment of the Project's consistency with the applicable air quality goals, objectives, and policies in the Air Quality Element of the General Plan.

TABLE IV.B-5A
CONSISTENCY WITH APPLICABLE AIR QUALITY POLICIES OF THE GENERAL PLAN

Recommendation	Conflict Analysis
Air Quality Element	
Goal 1: Good air quality and mobility in an environment of continued population growth and healthy economic structure.	**No Conflict.** The Project would provide complementary recreational and restaurant (café) land uses within a quarter-mile of existing off-site commercial and residential uses, and within an identified HQTA in a walkable area served by transit and is in urban infill site in an already established neighborhood in proximity to the Harvard-Westlake Upper School campus. This allows Project spectators, visitors, students and employees access to convenient modes of transportation that provide options for reducing reliance on automobiles, thereby minimizing associated air pollutant emissions. In addition, as discussed under Threshold a), the Project would be consistent with the relevant SCAG growth projections in the SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS that were used in preparing the 2016 AQMP and 2022 AQMP, respectively. As a result, the Project would provide people with convenient mobility options and economic/employment opportunities.
Objective 1.1: It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan, increase traffic mobility, and sustain economic growth citywide.	**No Conflict.** The Project's location, land use characteristics and project design features would reduce emissions associated with energy. The Project would provide complementary recreational and restaurant (café) land uses within a quarter-mile of existing off-site commercial and residential uses, and within an identified HQTA in a walkable area served by transit urban infill site in an already established neighborhood in proximity to the Harvard-Westlake Upper School campus. As such, the Project Site is well served by public transportation. Several transit providers

TABLE IV.B-5A
CONSISTENCY WITH APPLICABLE AIR QUALITY POLICIES OF THE GENERAL PLAN

Recommendation	Conflict Analysis
	operate service within the immediate vicinity, including LADOT's Downtown Area Short Hop (DASH) Van Nuys/Studio City bus, with stops at Whitsett Avenue/Valley Spring Lane adjacent to the Project Site, and Whitsett/Ventura Boulevard, 0.13 miles to the south. Transit service also includes the Los Angeles County Metropolitan Transportation Authority's (Metro) Local Line 167, with stops at Whitsett Avenue/Valley Spring Lane adjacent to the Project Site and at Whitsett Avenue/Ventura Boulevard, approximately 0.13 mile to the south. In addition, Metro Bus Rapid Transit Line 750 and Local Lines 150/240 on Ventura Boulevard, which provide connection to the Metro B Line Universal City/Studio City Station, are located approximately 2.5 miles to the east. The Project Site is also 2.25 miles southwest of the Metro B Line North Hollywood Station, which also serves the Metro G Line. As such, the Project would be supportive of the Transportation Control Measures in the AQMP related to reducing vehicle trips for Project spectators, visitors, students and employees. The Project would increase recreational and restaurant (café) density near public transit, which would reduce the Project's transportation-related emissions compared to a development that is not located near transit options.
Objective 1.3: It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	**No Conflict.** The Project would incorporate measures that would reduce particulate air pollutants from unpaved areas, parking lots, and construction sites. The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403. The Project would also comply with the applicable provisions of the CARB Air Toxics Control Measure regarding idling limitations for diesel trucks, which would reduce exhaust diesel particulate matter emissions. The Project would require the construction contractor(s) to comply with the applicable provisions of the CARB In-Use Off-Road Diesel Vehicle Regulation, which aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. The Project would require the contractors and vendors to comply with the applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO_X emissions from existing diesel trucks. The Project would also implement an extensive tree and landscaping program, which would effectively minimize particulate emissions from unpaved (or dirt) areas of the Project Site.
Policy 1.3.1: Minimize particulate emissions from construction sites.	**No Conflict.** The Project would incorporate measures that would reduce particulate air pollutants from construction activity as discussed under Objective 1.3.

TABLE IV.B-5A
CONSISTENCY WITH APPLICABLE AIR QUALITY POLICIES OF THE GENERAL PLAN

Recommendation	Conflict Analysis
Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**No Conflict.** The Project would implement required control measures for construction-related fugitive dust pursuant to SCAQMD Rule 403, which would minimize particulate emissions from unpaved roads and parking lots associated with construction-related vehicular traffic. See also discussion under Objective 1.3.
Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.	**No Conflict.** The Project would support reducing single-occupant vehicles by co-locating complementary recreational and restaurant (café) land uses within a quarter-mile of existing off-site commercial and residential uses, and within an identified HQTA in a walkable area in an urban infill location with nearby access to public transportation within 0.25 miles of the Project Site. The Project would also reduce single-occupancy vehicle trips by implementing a shuttle system between the Upper School campus and the Project Site whenever there are School activities underway at the Project Site. In addition, although the Project is not required to provide any bicycle parking spaces per the LAMC, the Project would also provide up to 100 on-site bicycle parking spaces to encourage alternative modes of transportation and reduce vehicle trips.
Objective 2.1: It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.	**No Conflict.** The Project would be located within an identified HQTA within a quarter-mile of existing public transportation, including LADOT's DASH Van Nuys/Studio City bus with stops at Whitsett Avenue/Valley Spring Lane adjacent to the Project Site, and the Metro Local Line 167 with stops at Whitsett Avenue/Ventura Boulevard, 0.13 miles to the south of the Project Site. Other transit services include Metro Bus Rapid Transit (BRT) Line 750 and Local Line 150/240 bus Ventura Boulevard/Coldwater Canyon Avenue, which provide connections to the Metro B (Red) Line North Hollywood Station 2.25 miles to the east of the Project Site, which also serves the Metro G (Orange) Line. The Project would also reduce single-occupancy vehicle trips by implementing a shuttle system between the Upper School campus and the Project Site whenever there are School activities underway at the Project Site. In addition, although the Project is not required to provide any bicycle parking spaces per the LAMC, the Project would also provide up to 100 on-site bicycle parking spaces to encourage alternative modes of transportation. These features would reduce single occupancy vehicle trips and encourage spectators, visitors, students and employees to utilize alternative modes of transportation.

TABLE IV.B-5A
CONSISTENCY WITH APPLICABLE AIR QUALITY POLICIES OF THE GENERAL PLAN

Recommendation	Conflict Analysis
Policy 2.1.1: Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**No Conflict.** The Project would be located within a quarter-mile of existing public transportation and would provide extensive pedestrian pathways throughout the Project Site, which would enhance pedestrian access to on-site uses. The Project would also provide bicycle parking facilities. These features would reduce work trips and encourage employees to utilize alternative modes of transportation including public transportation, walking, and bicycling.
Objective 2.2: It is the objective of the City of Los Angeles to increase vehicle occupancy for non-work trips by creating disincentives for single passenger vehicles, and incentives for high occupancy vehicles.	**No Conflict.** While this action applies to the employees and operation of City of Los Angeles and is not applicable to private projects, such as the Project, the Project would be located within an identified HQTA within a quarter-mile of existing public transportation, including LADOT's DASH Van Nuys/Studio City bus with stops at Whitsett Avenue/Valley Spring Lane adjacent to the Project Site, and the Metro Local Line 167 with stops at Whitsett Avenue/Ventura Boulevard, 0.13 miles to the south of the Project Site. Other transit services include Metro BRT Line 750 and Local Line 150/240 bus Ventura Boulevard/Coldwater Canyon Avenue, which provide connections to the Metro B (Red) Line North Hollywood Station 2.25 miles to the east of the Project Site, which also serves the Metro G (Orange) Line. In addition, although the Project is not required to provide any bicycle parking spaces per the LAMC, the Project would also provide up to 100 on-site bicycle parking spaces to encourage alternative modes of transportation and reduce single-occupant vehicle trips.
Policy 2.2.1: Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**No Conflict.** The Project is proposed on an infill location and would facilitate pedestrian and bicycle movements by providing access to and from on-site uses where the primary pedestrian/bicycle entrance to the Project Site would be provided off Whitsett Avenue near the north vehicle entrance driveway. Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter. The Project would designate a minimum of eight percent of on-site parking for carpool and/or alternative-fueled vehicles (approximately 33 spaces). The Project would also encourage the use of electric vehicles, as the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 40 percent of the parking spaces (approximately 160 spaces), with 13 percent of the Code-required spaces further improved with electric vehicle charging stations (approximately 54 spaces). In addition, although the Project is not required to provide any bicycle parking spaces per the LAMC, the Project would also provide up to 100 on-site bicycle parking spaces to encourage alternative modes of transportation. In addition, as discussed previously, the

TABLE IV.B-5A
CONSISTENCY WITH APPLICABLE AIR QUALITY POLICIES OF THE GENERAL PLAN

Recommendation	Conflict Analysis
	Project would be located within an identified HQTA within a quarter-mile of existing public transportation, including LADOT''s DASH Van Nuys/Studio City bus with stops at Whitsett Avenue/Valley Spring Lane adjacent to the Project Site, and Metro Local Line 167 with stops at Whitsett Avenue/Ventura Boulevard, 0.13 miles to the south of the Project Site. Other transit services include Metro BRT Line 750 and Local Line 150/240 bus Ventura Boulevard/Coldwater Canyon Avenue, which provide connections to the Metro B (Red) Line North Hollywood Station 2.25 miles to the east of the Project Site, which also serves the Metro G (Orange) Line. All of these measures are trip reduction measure designed to reduce single occupancy vehicles. Market incentive strategies, mode-shift incentives, and ridesharing subsidies are not applicable to the Project.
Policy 2.2.2: Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**No Conflict.** While this action applies to the employees and operation of City of Los Angeles and is not applicable to private projects, such as the Project, the Project would implement a shuttle system between the Upper School campus and the Project Site which would encourage multi-occupant vehicle travel.

SOURCE: ESA, 2023

23. Page IV.B-54, Subsection (2) Mitigation Measures, (a) Construction, modify the 3rd bullet point in Mitigation Measure AQ-MM-1 as follows:

    - During demolition, site preparation, and grading and excavation activities, the contractor shall provide notification and documentation that haul truck drivers have received training regarding idling limitations specified in Title 13 California Code of Regulations, Section 2485, and that haul trucks limit idling for loading activities to 5 minutes or less at any one location and unloading activities to ~~10~~ 5 minutes or less at any one location ~~per one-way truck trip~~.

24. Page IV.B-61, Subsection (i) Construction, modify the 1st sentence in the 2nd paragraph under this Subsection as follows:

In addition, the Project would be consistent with the applicable 2016 and 2022 AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

25. Page IV.B-65, Subsection (a) Consistency with Air Quality Management Plan, modify the 2nd complete paragraph below as follows:

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's cumulative air quality impacts are determined not to be significant based on its consistency with the SCAQMD's adopted 2016 and 2022 AQMP's, as discussed above. As is also discussed above, the Project's increase in population, housing, and employment would be consistent with both the 2016-2040 and 2020-2045 RTP/SCS growth projections, upon which the 2016 and 2022 AQMP's ~~is~~ are based. Related projects would also be required to assess consistency with ~~2016~~ the applicable AQMP transportation control strategies, as well as with population, housing, and employment growth projections in the most recent RTP/SCS and provide mitigation measures if significant impacts are identified. As discussed in Threshold (a), the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for ozone Therefore, the Project would be consistent with and would not conflict with or obstruct implementation of the applicable ~~2016~~ AQMP. **Accordingly, Project impacts are not cumulatively considerable and cumulative impacts are less than significant.**

5. Section IV.C. Biological Resources

1. Page IV.C-30, Subsection C), Project Design Features, revise name of Project Design Feature PDF-BIO-1 to BIO-PDF-1 as follows:

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

2. Page IV.C-31, Subsection C), Project Design Features, add the below listed Project Design Features. BIO-PDF-2 is added to minimize the potential to disturb the natural community plantings within the Zev Greenway area and further small wildlife movement through the local area. BIO-PDF-3 is added to increase the beneficial uses of the Zev Greenway as a natural open space area and minimize indirect impacts to wildlife. BIO-PDF-4 is added to discourage potential conflicts between wildlife and users of the Zev Greenway.

   BIO-PDF-2: Small wildlife permeable fencing will be installed along the edge of the Leased Property and the Zev Greenway in order to discourage human entry into the natural community plantings of the Zev Greenway. The fence design will allow unimpeded aesthetic views to the Los Angeles River, while allowing small wildlife to pass through or under the fencing. The fence design will support the goals of the Los Angeles River Revitalization Master Plan. Also, railing will be provided along the ADA-compliant pedestrian ramp leading from the Project Site to the Zev Greenway to discourage people from entering into the natural community plantings of the Zev Greenway. The fence design and railing will be reviewed by the City prior to installation.

BIO-PDF-3: Harvard-Westlake School will make available to the Zev Greenway trail users educational materials and signage at the entrance to the ADA-compliant pedestrian ramp located between the Project's gymnasium and the Zev Greenway. The materials and signage will promote awareness that human activities, such as trail use, may impact or disturb wildlife use of open spaces. Educational materials and signage will explain how human activity impacts, inclusive of noise and odors, may have on natural habitats growing within the Zev Greenway, emphasizing the increased severity during breeding seasons. The signage will be submitted for review by the City for compliance with any applicable regulations and will also: 1) educate and inform the public about wildlife present in the area; 2) advise on proper use of the ramp in a manner respectful to wildlife; and 3) provide local contact information to report injured or dead wildlife. Signage will be written in the language(s) understandable by residents in the local vicinity and to those most likely to use the ramp. Signage will be made of materials not harmful to wildlife, avoiding glass or the use of spikes.

BIO-PDF-4: As part of the Project's routine maintenance program, Harvard-Westlake School will place a waste receptacle at the entrance to the Project's ADA-compliant pedestrian ramp located between the Project's gymnasium and the Zev Greenway in order to avoid or minimize the potential to create an attractive nuisance of an unnatural food source for wildlife. The receptacle will be regularly maintained to avoid waste materials inadvertently entering the Zev Greenway area.

3. Pages IV.C-39, Subsection (b), Candidate, Sensitive or Special Status Wildlife, (i) indirect impacts, modify the 4th sentence of the 1st paragraph as follows:

In comparison, the Project would include ~~45~~ 22 total light poles (excluding the six existing golf ball-shaped light standards) that range between ~~21~~ 40 feet and 80 feet in height.

4. Pages IV.C-41, Subsection (b), Candidate, Sensitive or Special Status Wildlife, (i) indirect impacts, add the below sentence, based on CDFW recommendations, after the 1st full sentence of the 1st partial paragraph as follows:

During operation, the Project would implement Project Design Features BIO-PDF-3 and BIO-PDF-4 to minimize indirect impacts to wildlife. Indirect impacts associated with a change in the on-site operational noise and human activities would be similar to existing conditions with the potential for more noise and human activities during sports events.

5. Page IV.C-41 and IV.C-42, Subsection (2) Mitigation Measures, Mitigation Measure BIO-MM-1 is modified as follows, based in part on CDFW recommendations, to provide special-status bat species protection during construction, regardless of when the construction may be initiated.

BIO-MM-1: Due to the presence of potentially suitable roosting habitat (ornamental trees) for special-status bat species (i.e., western yellow bat), Harvard-Westlake

School shall demonstrate and guarantee to the satisfaction of the Los Angeles Department of City Planning that either of the following has been or shall be accomplished:

1. Tree removal activities shall be scheduled outside of the maternity roosting season (October 1 through February 28) to avoid potential impacts to special-status bat species during breeding season.
2. Any construction or palm tree removal activities that occur during the maternity roosting season for special-status bat species (March 1 through September 30) shall require a qualified biologist experienced with bat roost biology to conduct a pre-construction (or pre-tree removal) survey, using sonic bat detectors (e.g., Anabat ~~or Sonobat~~ and night vision goggles for an emergence survey (for at least one-hour after sunset) to determine whether special status bat species are roosting within trees that would be removed. A qualified biologist is a biologist with specialized bat experience including the familiarity with bat roost biology (i.e., a professional biologist with a minimum of two years of bat survey experience, inclusive of acoustic survey experience). The surveys shall be conducted at dusk and after nightfall by a biologist. If an active roost site is located during the pre-construction survey, the roost shall be avoided and Project activities shall be conducted as recommended by the biologist to avoid the area, which may include temporary postponement or provision of a suitable buffer established around the roost until roosting activities cease. ~~Suitable buffers could include netting, canvas, or similar materials as recommended by the biologist.~~ A report shall be submitted to the City with the results of the pre-construction or tree removal survey and any needed maternity roost avoidance actions~~.~~ prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of roosting habitat for bats. If special-status bats are detected during the survey, a qualified bat specialist shall prepare species specific mitigation measures to reduce or avoid impacts to each special-status species detected. Mitigation may include avoidance through postponing or temporarily halting construction until maternal roost use is completed, use of construction buffers of no less than 100-feet, or the installation of bat boxes in proximity to detected maternal roosts. Avoidance measures shall be based on site-specific factors to prevent roost disturbances, including, but not limited to: numbers and locations of bats, proposed construction activities, height and distance of bat roosts from proposed construction activities, the presence of visual and/or acoustic barriers between the roost and proposed activities, and the pre-existing level of human activities (e.g., ambient noise, potential movement, etc.) to which the bats may already tolerate.
3. If special-status bats are not detected, but the bat specialist nonetheless determines that roosting bats may be present at any time of year and could roost in trees at a given location, tree removal activities shall be initiated by pushing trees using heavy machinery prior to using a chainsaw to remove the tree. In order to provide the optimal warning to any roosting special-

status bats that may be present, trees shall be pushed lightly two or three times, with an approximately 30-second pause between each nudge/push to allow bats to become active. A period of at least 24 hours shall elapse between such operations to allow special-status bats to escape the construction area.

6. Page IV.C-42, Subsection (a) Sensitive Natural Communities, (i) Direct Impacts, modify the 2nd sentence of the 1st paragraph as follows:

As summarized in **Table IV.C-2**, *Impacts to Plant Communities*, implementation of the Project would result in limited impacts from a proposed river connection (~~trail~~ ramp), river fence, and river overlook to 0.14 acre of recently restored California brittlebush scrub (16 percent[53] of off-site sensitive natural community).

7. Page IV.C-43, Subsection (a) Sensitive Natural Communities, (ii) Indirect Impacts, modify the 2nd paragraph as follows:

Indirect Project construction and operation activities, such as changes in the ambient levels of light and noise, human activity, or potential for introduction of non-native species, would not result in significant impacts to sensitive natural communities. The California brittlebush scrub occurs ~~along a public trail~~ near the new ADA-compliant pedestrian ramp that would connect to the existing Zev Greenway, and the additional human activity, light, or noise would not have an adverse effect on this sensitive natural community since the plants would not be affected by subtle changes in Project light, noise, or human activity. Also, the Project would implement Project Design Feature BIO-PDF-2, which includes railing along the ADA-compliant pedestrian ramp leading from the Project Site to the Zev Greenway to discourage people from entering into the natural community plantings of the Zev Greenway. Furthermore, the Project's native landscaping, which would exclude invasive exotic plant species and, in fact, would proactively remove Mexican fan palms, would help to enhance this sensitive natural community, as well as the surrounding area, 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 (such as currently occurs through the rapid spread of Mexican fan palms). **Thus, indirect Project construction and operation activities would not result in significant impacts to sensitive natural communities**.

8. Page IV.C-44, Subsection (2) Mitigation Measures, Mitigation Measure BIO-MM-2 is revised to provide additional assurance that the sensitive natural community of California brittlebush scrub will be successfully restored to pre-project conditions.

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

used for the Zev Greenway restoration habitat. The replacement of sensitive natural community habitat shall be planted clustered adjacent to and contiguous with the Zev Greenway, and the locations and species shall be to the satisfaction of the Department of City Planning and in conformance with the landscape and planting guidelines in the Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes. Replacement sensitive natural community habitat areas shall be planted on-site and shall be shown on the Project's landscape plan. The restored sensitive natural community shall be monitored for five years to verify that California brittlebush scrub has been successfully restored with the survival of the plants depicted in the approved landscape plan at the conclusion of the five years of monitoring.

9. Page IV.C-45, Subsection (a) Wildlife Movement and Corridors, add the sentence shown below after the 4th sentence of the 3rd paragraph as follows:

The Zev Greenway also provides long-term recreational use of this reach of the Los Angeles River, increasing human activity adjacent to the Biological Study Area. As such, most wildlife that is currently using this reach of the Los Angeles River is likely adapted to urban environments. Furthermore, the Project would implement Project Design Feature BIO-PDF-2, which includes wildlife permeable fencing to be installed along the edge of the Leased Property and the Zev Greenway that would allow small wildlife to pass through or under the fencing.

10. Page IV.C-47, Subsection (b) Migratory Species and Native Wildlife Nursery Sites, modify the last sentence on the page in the 2nd full paragraph as follows:

Project Design Feature ~~PDF-~~BIO-PDF-1, which demonstrates compliance with regulatory requirements for nesting bird protection, and Mitigation Measure BIO-MM-1 would reduce any direct impacts to nesting birds and roosting bat species to a less-than-significant level.

11. Page IV.C-48, Subsection (2) Mitigation Measures, modify the 2nd paragraph as follows:

Refer to the prior discussion of Mitigation Measure BIO-MM-1 for roosting bat species and Project Design Feature ~~PDF-~~BIO-PDF-1 for nesting birds. No additional mitigation measures are required.

12. Page IV.C-49, Subsection (3) Level of Significance After Mitigation, modify the 1st on the page as follows:

By avoiding nesting or maternity roosting season, or by conducting pre-construction surveys during nesting or maternity roosting season and avoiding direct impacts active nests or roosts, potentially significant direct and indirect impacts on nesting bird and roosting bat species would be reduced to a less-than-significant level with implementation of Mitigation Measure BIO-MM-1 and Project Design Feature ~~PDF-~~BIO-PDF-1.

13. Page IV.C-49, Subsection (a) City of Los Angeles Local Plans and Ordinances, (i) Framework Element, modify the 3rd sentence as follows:

Policy 6.1.2 requires the coordination of "City operations and development policies for the protection and conservation of open space resources, by . . . preserving habitat linkages, where feasible, to provide wildlife corridors and to protect natural animal ranges." With the implementation of Mitigation Measures BIO-MM-1 and BIO-MM-2, as well as Project Design Features ~~PDF-~~BIO-PDF-1 through BIO-PDF-4, ~~above,~~ the Project would replace impacted sensitive natural communities and reduce potentially significant impacts on native wildlife nursery sites (nesting bird and roosting bat species), as well as minimize impact to wildlife traversing through and within the Project Site. Thus, the Project would not conflict with the City's Framework Element objectives and policies.

14. Pages IV.C-49 and IV.C-50, Subsection (a) Local City of Los Angeles Plans and Ordinances, (ii) Conservation Element, modify the last partial sentence on page IV.C-49 that continues onto page IV.C-50 as follows:

With the implementation of Mitigation Measures BIO-MM-1 and BIO-MM-2, as well as Project Design Features ~~PDF-~~BIO-PDF-1 through BIO-PDF-4, ~~above,~~ the Project would replace impacted sensitive natural communities and reduce potentially significant impacts on native wildlife nursery sites (nesting bird and roosting bat species), as well as minimize impact to wildlife traversing through and within the Project Site. Thus, the Project would not conflict with the City's Conservation Element objectives and policies.

15. Page IV.C-51, Subsection (iv) Community Plan, modify the 4th sentence of the 1st paragraph of the subsection as follows:

The Project would provide 5.4 acres of landscaping and pathways for public use, including a new ~~trail~~ ramp connection to the Zev Greenway.

16. Page IV.C-52, Subsection (v) Ordinances and Other Planning Documents, modify the 1st two sentences of the 1st paragraph as follows:

In compliance with efforts to revitalize the Los Angeles River and consistent with the City's RIO District Ordinance and Los Angeles River Master Plan Landscaping Guidelines and Plant Palettes, the Project would provide 5.4 acres of publicly-accessible open space and landscaped pathways ~~trails~~ connecting to the Zev Greenway and to on-site landscaped areas~~, water features~~, and recreational facilities. The ~~water features,~~ benches, wooded areas, and natural spaces would be open and available to the public daily (in addition to the other Project Site recreational facilities), providing public access to the Biological Study Area's river frontage.

17. Page IV.C-54, Subsection (v) Ordinances and Other Planning Documents, modify the 2nd full paragraph as follows:

Additionally, a large portion of the Project Site is currently landscaped with water-intensive grass that, on average, requires the use of approximately one million gallons

of water each month. Because the existing golf course must be watered frequently, many of the fertilizers applied to the Project Site are not immediately and fully absorbed into the soil and potentially washed off-site into other portions of the Biological Study Area and the Los Angeles River, thus, contributing to downstream pollution and impacting the City's watershed. The Project includes an underground stormwater capture and reuse system in the northeastern portion of the Biological Study Area to treat water that is collected onsite~~, as well as water collected from the 39-acre residential neighborhood to the north of the Biological Study Area~~. This supports improving the health of the City's watersheds, which is a goal of the RIO District Ordinance.

18. Page IV.C-56, Subsection (2) Mitigation Measures, modify Mitigation Measure BIO-MM-3 as follows:

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

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

    A monitoring report shall be prepared by a Tree Expert (as defined in LAMC Section 17.02) and submitted to the Department of City Planning and/or City's Urban Forester within one-month following the completion of Project construction. After three years following the completion of Project construction a Tree Expert (as defined in LAMC Section 17.02) shall assess the health and overall condition of all replacement trees. If any of the on-site, off-site or public street trees die within three years as a consequence of construction, they shall be replaced.

19. Page IV.C-58, Subsection (2) Mitigation Measures, modify the 2nd paragraph as follows:

Cumulative impacts to biological resources would be less than significant with the incorporation of Project Design Features ~~PDF-~~BIO-PDF-1 through BIO-PDF-4 and Mitigation Measures BIO-MM-1 through BIO-MM-3 for the Project (i.e., avoidance of nesting and roosting seasons or preconstruction surveys for special-status species, replacing impacted California brittlebush scrub, avoidance of nesting and roosting

seasons or pre-construction surveys for native wildlife nursery sites, and replacement of "non-protected" significant and street trees). No additional mitigation measures beyond those identified for the reduction of impacts related to biological resources are required.

6. Section IV.D. Cultural Resources

1. Page IV.D-30 Subsection c) Project Design Features, modify the 2nd bullet of CUL-PDF-1 as follows:

   - Appropriate measures for protecting all identified character-defining features of the Project Site during construction activity. If necessary, a physical barrier (e.g., exclusion or cyclone fencing) will be erected to separate and protect the clubhouse, and other features as needed, during construction. Vibratory rollers will not be used on the Project Site within 40 feet of the clubhouse and low brick wall with weeping mortar. Large dozers (300 horsepower and greater) and caisson drills will not be used on the Project Site within 25 feet of the clubhouse, putting green, and low brick wall with weeping mortar; loaded trucks will not be used on the Project Site within 20 feet of the clubhouse, putting green, and low brick wall with weeping mortar; and jackhammers will not be used on the Project Site within 12 feet of the clubhouse, putting green, and low brick wall with weeping mortar.

2. Page IV.D-34 Subsection (2) Mitigation Measures, modify the 1st paragraph as follows:

As described above, the Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the HCM, Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically ~~PDF-~~CUL-PDF-1, Rehabilitation Plan, ~~PDF-~~CUL-PDF-2, Documentation, and ~~PDF-~~CUL-PDF-3, Interpretation. Accordingly, impacts on an historical resource as defined in CEQA Guidelines Section 15064.5 were determined to be less than significant. Therefore, no mitigation measures are required.

7. Section IV.E. Energy

1. Page IV.E-20 Subsection c) Project Design Features, modify the 1st paragraph as follows:

The Project would include Project Design Features designed to improve energy efficiency as discussed further below and as set forth in Sections IV.~~B~~, *Air Quality*~~,~~ and Section IV.G, *Greenhouse Gas Emissions*. In particular, as per Project Design Feature GHG-PDF-1, the Project would include solar voltaic panels on the roof of the gymnasium that would generate on-site renewable electricity of approximately ~~339,000~~ 281,000 kWh per year and reduce the amount of electricity demand from City utilities.

2. Page IV.E-22, Table IV.E-1, *Summary of Energy Use During Project Construction*, modify the table as follows:

TABLE IV.E-1
SUMMARY OF ENERGY USE DURING PROJECT CONSTRUCTION [a]

Energy Type	Total Quantity	Annual Average Quantity During Construction [b]
Electricity		
Construction Office	32,635 kWh	12,990 kWh
Electricity from Water (Dust Control)	379,497 kWh	151,054 kWh
Total Electricity	**412,132 kWh**	**164,044 kWh**
Gasoline		
On-Road Construction Equipment	~~169,155~~ 169,978 gallons	~~67,330~~ 67,658 gallons
Off-Road Construction Equipment	0 gallons	0 gallons
Total Gasoline	**~~169,155~~ 169,978 gallons**	**~~67,330~~ 67,658 gallons**
Diesel		
On-Road Construction Equipment	~~367,782~~ 321,170 gallons	~~146,391~~ 127,838 gallons
Off-Road Construction Equipment	~~751,499~~ 750,984 gallons	~~299,124~~ 298,920 gallons
Total Diesel	**~~1,119,281~~ 1,072,154 gallons**	**~~445,515~~ 426,757 gallons**

kWh = kilowatt-hours

[a] Detailed calculations are provided in Appendix ~~F~~ K of this ~~Draft~~ Final EIR.

[b] Numbers may not add up due to rounding.

SOURCE: ESA, 202~~1~~3.

3. Page IV.E-23 Subsection (c) Transportation Energy, modify the 1st paragraph as follows:

Table IV.E-1 reports the estimated amount of petroleum-based transportation energy that is expected to be consumed during Project construction. Energy calculations are provided in Appendix ~~F~~ K of ~~this Draft~~ the Final EIR. During Project construction, on- and off-road vehicles would consume an estimated annual average of approximately ~~67,330~~ 67,658 gallons of gasoline and approximately ~~445,515~~ 426,757 gallons of diesel. Project construction activities would last for approximately 30 months. For comparison purposes only, and not for the purpose of determining significance, the fuel usage during Project construction would represent approximately 0.002 percent of the 2019 annual on-road gasoline-related energy consumption of 3,559,000,000 gallons and ~~0.079~~ 0.076 percent of the 2019 annual diesel fuel-related energy consumption of 563,265,306 gallons in Los Angeles County,[48] as shown in Appendix ~~F~~ K of ~~this Draft~~ the Final EIR.

4. Page IV.E-25, Table IV.E-2, *Summary Of Annual Net New Energy Use During Project Operation – Project*, modify Table IV.E-2 as follows:

TABLE IV.E-2
SUMMARY OF ANNUAL NET NEW ENERGY USE DURING PROJECT OPERATION – PROJECT [a,c]

Energy Type	Annual Quantity [b]
Electricity	
Existing Site	(805,828 kWh)
Proposed Project	
Building Energy	2,495,770 kWh
Water Conveyance	188,839 kWh
Pole and LED Lighting	185,994 kWh
EV Charging	85,440 kWh
Solar Photovoltaic Array	(~~339,000~~ 281,000) kWh
Project Subtotal	~~2,617,043~~ 2,675,043 kWh
Total Net Electricity	**~~1,811,215~~ 1,869,215 kWh**
Natural Gas	
Existing Site	(9,682 cf)
Proposed Project	
Building Energy	1,673,041 cf
Mobile Sources	151 cf
Project Subtotal	1,673,192 cf
Total Net Natural Gas	**1,663,510 cf**
Transportation	
Existing Site	
Gasoline	(86,535 gallons)
Diesel	(8,319 gallons)
Proposed Project	
Gasoline	132,955 gallons
Diesel	14,756 gallons
Total Net Transportation – Gasoline	**46,419 gallons**
Total Net Transportation – Diesel	**6,437 gallons**

kWh = kilowatt-hours

cf = cubic feet

[a] Detailed calculations are provided in Appendix ~~F~~ K of this ~~Draft~~ Final EIR.

[b] Totals may not add up exactly due to rounding of decimals.

[c] Negative values are denoted using parentheses.

[d] Project electricity and natural gas estimates assume compliance with applicable 2019 Title 24 and CALGreen requirements and implementation of Project Design Feature GHG-PDF-1 in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR.

SOURCE: ESA, 202~~1~~3.

5. Page IV.E-26 Subsection (a) Electricity, modify the 1st sentence of the 1st paragraph as follows:

With compliance with 2019 Title 24 standards and applicable 2019 CALGreen requirements, at buildout, the Project would result in a projected net increase in the on-site annual demand for electricity totaling ~~1,811,215~~ 1,869,215 kWh for the Project, as shown in Table IV.E-2.

6. Page IV.E-26 Subsection (a) Electricity, modify the 2nd paragraph as follows:

Further, it is important to note that the total net Project energy demand in Table IV.E-2 does not reflect the fact that Project operational-related energy would likely be lower as the Project would provide sustainability features that would reduce the Project's outdoor water demand as described in Section IV.O.1, *Utilities and Service Systems –Water Supply and Infrastructure*. These measures include the ~~1 million-~~ approximately 350,000-gallon ~~-~~stormwater capture and reuse system that is expected to provide a ~~minimum of one-third~~ portion of the Project's total annual irrigation demand; stormwater collection and treatment to collect rainwater ~~and other urban runoff not only at the corner of Whitsett Avenue and Valley Spring Lane, but~~ throughout the Project Site and proposed building roofs; rainwater from parking areas to drain to the landscape areas for storage; replacing the existing uses with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass and reduction in water demand and avoid the use of pesticides; and maintaining 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused. The stormwater capture and reuse system would save electricity by collecting local water and reducing irrigation demand ~~from off-site water sources that have higher energy intensity~~. The reduction in irrigation water demand was conservatively not included in the Project's overall water demand, as evaluated in Section IV.O.1, *Water Supply*, of the Draft EIR. ~~Overall, the stormwater capture and reuse system would reduce irrigation demand from off-site sources by at least 6.7 acre-feet per year. These measures were conservatively not accounted for since a specific outdoor water reduction value could not conclusively be calculated~~.

7. Page IV.E-27 Subsection (a) Electricity, modify the 3rd paragraphs as follows:

Based on LADWP's collected data in its 2017 Power Strategic Long-Term Resource Plan, LADWP forecasts that its net energy for load in the 2025-2026 fiscal year (the Project's buildout year) will be 26,748 GWh of electricity.[54,55] As such, the Project-related net increase in annual electricity consumption of ~~1,811,215~~ 1,869,215 kWh for the Project would represent 0.007 percent of LADWP's projected sales in 2025 and would be within LADWP's projected electricity supplies.

8. Page IV.E-31 Section (ii) Operation, Subsection (a) Electricity, modify the 2nd sentence of the 1st paragraph as follows:

The Project-related net increase in annual electricity consumption of ~~1,811,215~~ 1,869,215 kWh/year would represent 0.007 percent of LADWP's projected sales for the 2025-2026 fiscal year and would be consistent with LADWP's anticipated regional demand from population or economic growth.

9. Pages IV.E-33 Section (c) The Effects of the Project on Peak and Base Period Demands for Electricity and Other Forms of Energy, modify the 5th full sentence of the 1st partial paragraph as follows:

Under peak conditions, the Project would consume a net increase of ~~1,811,215~~ 1,869,215 kWh on an annual basis which, assuming 12 hours of active electricity demand per day, would be equivalent to ~~414~~ 427 kW (peak demand assuming 4,380 hours per year of active electricity demand).

10. Pages IV.E-34 Section (d) The Effects of the Project on Energy Resources, modify the 1st full paragraph as follows:

With regard to on-site renewable energy sources, the Project would meet the applicable requirements of the Los Angeles Green Building Code and the CALGreen Code. The Project will implement Project Design Feature GHG-PDF-1, where the Project will include solar voltaic panels on roof of the gymnasium to reduce the amount of electricity drawn from City utilities by approximately ~~11.5~~ 10.2 percent.

8. Section IV.F. Geology and Soils

1. Page IV.F-29, Subsection (1) Impact Analysis, modify the 1st paragraph as follows:

Project development would disturb a majority of the Project Site (746,532 square feet) and require excavation and grading of the Project Site to a maximum depth of approximately 21 feet for construction of the below-grade parking facility, gymnasium basement, and the ~~1 million~~ approximately 350,000-gallon stormwater capture and reuse system. Unadjusted rough grading cut volumes would be approximately ~~251,836~~ 199,000 cubic yards, and the fill volume would be approximately ~~1,836~~ 2,000 cubic yards, for a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards. Ground disturbing activities associated with the Project would disturb sediments associated with the Qay1 alluvial unit and the Pleistocene-age alluvium, which have low to high and high sensitivity for paleontological resources, respectively. Accordingly, the Project would have the potential to encounter paleontological resources on-site during site excavation.

9. Section IV.G. Greenhouse Gas Emissions

1. Page IV.G-18, add the following after the 1st partial paragraph and before (e) Cap-and-Trade Program, as follows:

(iii) 2022 Scoping Plan Update

The Scoping Plan is a greenhouse gas emission (GHG) reduction roadmap developed and updated by the California Air Resources Board (CARB) at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business as usual activities.[32a] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[32b] The 2017 Scoping Plan Update,[32c] shifted focus to the newer Senate Bill (SB) 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[32d] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

[32a] *CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf.*

[32b] *CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf.*

[32c] *CARB. 2017. California's 2017 Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.*

[32d] *CARB, California's 2017 Climate Change Scoping Plan, 2017. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.*

TABLE IV.G-3A
ESTIMATED STATEWIDE GREENHOUSE GAS EMISSIONS REDUCTIONS IN THE 2022 SCOPING PLAN

Emissions Scenario	GHG Emissions ($MMTCO_2e$)
2019	
2019 State GHG Emissions	404
2030	
2030 BAU Forecast	312
2030 GHG Emissions without Carbon Removal and Capture	233
2030 GHG Emissions with Carbon Removal and Capture	226
2030 Emissions Target Set by AB 32 (i.e., 1990 level by 2030)	260
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2030	52 (16.7%)[a]
2045	
2045 BAU Forecast	266
2045 GHG Emissions without Carbon Removal and Capture	72
2045 GHG Emissions with Carbon Removal and Capture	(3)

$MMTCO_2e$ = million metric tons of carbon dioxide equivalents; parenthetical numbers represent negative values.

[a] 312 – 260 = 52. 52 / 312 = 16.7%

SOURCE: CARB, Final 2022 Climate Change Scoping Plan, November 2022.

The 2022 Scoping Plan Update reflects existing and recent direction in the Governor's Executive Orders and State Statutes, which identify policies, strategies, and regulations in support of and implementation of the Scoping Plan. Among these include Executive Order B-55-18 and AB 1279 (The California Climate Crisis Act), which identify the 2045 carbon neutrality and GHG reduction targets required for the Scoping Plan.

Table IV.G-3B provides a summary of major climate legislation and executive orders issued since the adoption of the 2017 Scoping Plan.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Assembly Bill 1279 (AB 1279) (Muratsuchi, Chapter 337, Statutes of 2022) *The California Climate Crisis Act*	AB 1279 establishes the policy of the state to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. The bill requires CARB to ensure that Scoping Plan updates identify and recommend measures to achieve carbon neutrality, and to identify and implement policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage (CCUS) technologies. This bill is reflected directly in 2022 Scoping Plan Update.
Senate Bill 905 (SB 905) (Caballero, Chapter 359, Statutes of 2022) *Carbon Capture, Removal, Utilization, and Storage Program*	SB 905 requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate CCUS and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project. The 2022 Scoping Plan Update modeling reflects both CCUS and CDR contributions to achieve carbon neutrality.
Senate Bill 846 (SB 846) (Dodd, Chapter 239, Statutes of 2022) *Diablo Canyon Powerplant: Extension of Operations*	SB 846 extends the Diablo Canyon Power Plant's sunset date by up to five additional years for each of its two units and seeks to make the nuclear power plant eligible for federal loans. The bill requires that the California Public Utilities Commission (CPUC) not include and disallow a load-serving entity from including in their adopted resource plan, the energy, capacity, or any attribute from the Diablo Canyon power plant. The 2022 Scoping Plan Update explains the emissions impact of this legislation.
Senate Bill 1020 (SB 1020) (Laird, Chapter 361, Statutes of 2022) *Clean Energy, Jobs, and Affordability Act of 2022*	SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. This bill requires the CPUC, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability. The bill also modifies the requirement for CARB to hold a portion of its Scoping Plan workshops in regions of the state with the most significant exposure to air pollutants by further specifying that this includes communities with minority populations or low-income communities in areas designated as being in extreme federal non-attainment. The 2022 Scoping Plan Update describes the implications of this legislation on emissions.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Senate Bill 1137 (SB 1137) (Gonzales, Chapter 365, Statutes of 2022) *Oil & Gas Operations: Location Restrictions: Notice of Intention: Health protection zone: Sensitive receptors*	SB 1137 prohibits the development of new oil and gas wells or infrastructure in health protection zones, as defined, except for purposes of public health and safety or other limited exceptions. The bill requires operators of existing oil and gas wells or infrastructure within health protection zones to undertake specified monitoring, public notice, and nuisance requirements. The bill requires CARB to consult and concur with the California Geologic Energy Management Division (CalGEM) on leak detection and repair plans for these facilities, adopt regulations as necessary to implement emission detection system standards, and collaborate with CalGEM on public access to emissions detection data.
Senate Bill 1075 (SB 1075) (Skinner, Chapter 363, Statutes of 2022) *Hydrogen: Green Hydrogen: Emissions of Greenhouse Gases*	SB 1075 requires CARB, by June 1, 2024, to prepare an evaluation that includes: policy recommendations regarding the use of hydrogen, and specifically the use of green hydrogen, in California; a description of strategies supporting hydrogen infrastructure, including identifying policies that promote the reduction of GHGs and short-lived climate pollutants; a description of other forms of hydrogen to achieve emission reductions; an analysis of curtailed electricity; an estimate of GHG and emission reductions that could be achieved through deployment of green hydrogen through a variety of scenarios; an analysis of the potential for opportunities to integrate hydrogen production and applications with drinking water supply treatment needs; policy recommendations for regulatory and permitting processes associated with transmitting and distributing hydrogen from production sites to end uses; an analysis of the life-cycle GHG emissions from various forms of hydrogen production; and an analysis of air pollution and other environmental impacts from hydrogen distribution and end uses. This bill would inform the production of hydrogen at the scale called for in the 2022 Scoping Plan Update.
Assembly Bill 1757 (AB 1757) (Garcia, Chapter 341, Statutes of 2022) *California Global Warming Solutions Act of 2006: Climate Goal: Natural and Working Lands*	AB 1757 requires the California Natural Resources Agency (CNRA), in collaboration with CARB, other state agencies, and an expert advisory committee, to determine a range of targets for natural carbon sequestration, and for nature-based climate solutions, that reduce GHG emissions in 2030, 2038, and 2045 by January 1, 2024. These targets must support state goals to achieve carbon neutrality and foster climate adaptation and resilience. This bill also requires CARB to develop standard methods for state agencies to consistently track GHG emissions and reductions, carbon sequestration, and additional benefits from natural and working lands over time. These methods will account for GHG emissions reductions of CO_2, methane, and nitrous oxide related to natural and working lands and the potential impacts of climate change on the ability to reduce GHG emissions and sequester carbon from natural and working lands, where feasible. This 2022 Scoping Plan Update describes the next steps and implications of this legislation for the natural and working lands sector.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Senate Bill 1206 (SB 1206) (Skinner, Chapter 884, Statutes of 2022) *Hydrofluorocarbon gases: sale or distribution*	SB 1206 mandates a stepped sales prohibition on newly produced high-global warming potential (GWP) hydrofluorocarbons (HFCs) to transition California's economy toward recycled and reclaimed HFCs for servicing existing HFC-based equipment. Additionally, SB 1206 also requires CARB to develop regulations to increase the adoption of very low-, i.e., GWP < 10, and no-GWP technologies in sectors that currently rely on higher-GWP HFCs.
Senate Bill 27 (SB 27) (Skinner, Chapter 237, Statutes of 2021) *Carbon Sequestration: State Goals: Natural and Working Lands: Registry of Projects*	SB 27 requires CNRA, in coordination with other state agencies, to establish the Natural and Working Lands Climate Smart Strategy by July 1, 2023. This bill also requires CARB to establish specified CO_2 removal targets for 2030 and beyond as part of its Scoping Plan. Under SB 27, CNRA is to establish and maintain a registry to identify projects in the state that drive climate action on natural and working lands and are seeking funding. CNRA also must track carbon removal and GHG emission reduction benefits derived from projects funded through the registry. This bill is reflected directly in 2022 Scoping Plan Update as CO_2 removal targets for 2030 and 2045 in support of carbon neutrality.
Senate Bill 596 (SB 596) (Becker, Chapter 246, Statutes of 2021) *Greenhouse Gases: Cement Sector: Net- zero Emissions Strategy*	SB 596 requires CARB, by July 1, 2023, to develop a comprehensive strategy for the state's cement sector to achieve net-zero-emissions of GHGs associated with cement used within the state as soon as possible, but no later than December 31, 2045. The bill establishes an interim target of 40 percent below the 2019 average GHG intensity of cement by December 31, 2035. Under SB 596, CARB must: • Define a metric for GHG intensity and establish a baseline from which to measure GHG intensity reductions. • Evaluate the feasibility of the 2035 interim target (40 percent reduction in GHG intensity) by July 1, 2028. • Coordinate and consult with other state agencies. • Prioritize actions that leverage state and federal incentives. • Evaluate measures to support market demand and financial incentives to encourage the production and use of cement with low GHG intensity. The 2022 Scoping Plan Update modeling is designed to achieve these outcomes.
Executive Order N-82-20	Governor Newsom signed Executive Order N-82-20 in October 2020 to combat the climate and biodiversity crises by setting a statewide goal to conserve at least 30 percent of California's land and coastal waters by 2030. The Executive Order also instructed the CNRA, in consultation with other state agencies, to develop a Natural and Working Lands Climate Smart Strategy that serves as a framework to advance the state's carbon neutrality goal and build climate resilience. In addition to setting a statewide conservation goal, the Executive Order directed CARB to update the target for natural and working lands in support of carbon neutrality as part of this Scoping Plan, and to take into consideration the NWL Climate Smart Strategy.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
	CO_2 Executive Order N-82-20 also calls on the CNRA, in consultation with other state agencies, to establish the California Biodiversity Collaborative (Collaborative). The Collaborative shall be made up of governmental partners, California Native American tribes, experts, business and community leaders, and other stakeholders from across the state. State agencies will consult the Collaborative on efforts to: • Establish a baseline assessment of California's biodiversity that builds upon existing data and can be updated over time. • Analyze and project the impact of climate change and other stressors in California's biodiversity. • Inventory current biodiversity efforts across all sectors and highlight opportunities for additional action to preserve and enhance biodiversity. CNRA also is tasked with advancing efforts to conserve biodiversity through various actions, such as streamlining the state's process to approve and facilitate projects related to environmental restoration and land management. The California Department of Food and Agriculture (CDFA) is directed to advance efforts to conserve biodiversity through measures such as reinvigorating populations of pollinator insects, which restore biodiversity and improve agricultural production. The Natural and Working Lands Climate Smart Strategy informs 2022 Scoping Plan Update.
Executive Order N-79-20	Governor Newsom signed Executive Order N-79-20 in September 2020 to establish targets for the transportation sector to support the state in its goal to achieve carbon neutrality by 2045. The targets established in this Executive Order are: • 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. • 100 percent of medium- and heavy-duty vehicles will be zero-emission by 2045 for all operations where feasible, and by 2035 for drayage trucks. • 100 percent of off-road vehicles and equipment will be zero-emission by 2035 where feasible. The Executive Order also tasked CARB to develop and propose regulations that require increasing volumes of zero- electric passenger vehicles, medium- and heavy-duty vehicles, drayage trucks, and off-road vehicles toward their corresponding targets of 100 percent zero-emission by 2035 or 2045, as listed above. The 2022 Scoping Plan Update modeling reflects achieving these targets.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Executive Order N-19-19	Governor Newsom signed Executive Order N-19-19 in September 2019 to direct state government to redouble its efforts to reduce GHG emissions and mitigate the impacts of climate change while building a sustainable, inclusive economy. This Executive Order instructs the Department of Finance to create a Climate Investment Framework that: • Includes a proactive strategy for the state's pension funds that reflects the increased risks to the economy and physical environment due to climate change. • Provides a timeline and criteria to shift investments to companies and industry sectors with greater growth potential based on their focus of reducing carbon emissions and adapting to the impacts of climate change. • Aligns with the fiduciary responsibilities of the California Public Employees' Retirement System, California State Teachers' Retirement System, and the University of California Retirement Program. Executive Order N-19-19 directs the State Transportation Agency to leverage more than $5 billion in annual state transportation spending to help reverse the trend of increased fuel consumption and reduce GHG emissions associated with the transportation sector. It also calls on the Department of General Services to leverage its management and ownership of the state's 19 million square feet in managed buildings, 51,000 vehicles, and other physical assets and goods to minimize state government's carbon footprint. Finally, it tasks CARB with accelerating progress toward California's goal of five million ZEV sales by 2030 by: • Developing new criteria for clean vehicle incentive programs to encourage manufacturers to produce clean, affordable cars. • Proposing new strategies to increase demand in the primary and secondary markets for ZEVs. • Considering strengthening existing regulations or adopting new ones to achieve the necessary GHG reductions from within the transportation sector. The 2022 Scoping Plan Update modeling reflects efforts to accelerate ZEV deployment.
Senate Bill 576 (SB 676) (Umberg, Chapter 374, Statutes of 2019) *Coastal Resources: Climate Ready Program and Coastal Climate Change Adaptation, Infrastructure and Readiness Program*	Sea level rise, combined with storm-driven waves, poses a direct risk to the state's coastal resources, including public and private real property and infrastructure. Rising marine waters threaten sensitive coastal areas, habitats, the survival of threatened and endangered species, beaches, other recreation areas, and urban waterfronts. SB 576 mandates that the Ocean Protection Council develop and implement a coastal climate adaptation, infrastructure, and readiness program to improve the climate change resiliency of California's coastal communities, infrastructure, and habitat. This bill also instructs the State Coastal Conservancy to administer the Climate Ready Program, which addresses the impacts and potential impacts of climate change on resources within the conservancy's jurisdiction.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Assembly Bill 65 (AB 65) (Petrie- Norris, Chapter 347, Statutes of 2019) *Coastal Protection: Climate Adaption: Project Prioritization: Natural Infrastructure: Local General Plans*	This bill requires the State Coastal Conservancy, when it allocates any funding appropriated pursuant to the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018, to prioritize projects that use natural infrastructure in coastal communities to help adapt to climate change. The bill requires the conservancy to provide information to the Office of Planning and Research on any projects funded pursuant to the above provision to be considered for inclusion into the clearinghouse for climate adaption information. The bill authorizes the conservancy to provide technical assistance to coastal communities to better assist them with their projects that use natural infrastructure.
Executive Order B-55-18	Governor Brown signed Executive Order B-55-18 in September 2018 to establish a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. Policies and programs undertaken to achieve this goal shall: • Seek to improve air quality and support the health and economic resiliency of urban and rural communities, particularly low-income and disadvantaged communities. • Be implemented in a manner that supports climate adaptation and biodiversity, including protection of the state's water supply, water quality, and native plants and animals. This Executive Order also calls for CARB to: • Develop a framework for implementation and accounting that tracks progress toward this goal. • Ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The 2022 Scoping Plan Update is designed to achieve carbon neutrality no later than 2045 and the modeling includes technology and fuel transitions to achieve that outcome.
Senate Bill 100 (SB 100) (De León, Chapter 312, Statutes of 2018) *California Renewables Portfolio Standard Program: emissions of greenhouse gases*	Under SB 100, the CPUC, CEC, and CARB shall use programs under existing laws to achieve 100 percent clean electricity. The statute requires these agencies to issue a joint policy report on SB 100 every four years. The first of these reports was issued in 2021. The 2022 Scoping Plan Update reflects the SB 100 Core Scenario resource mix with a few minor updates.
Assembly Bill 2127 (AB 2127) (Ting, Chapter 365, Statutes of 2018) *Electric Vehicle Charging Infrastructure: Assessment*	This bill requires the CEC, working with CARB and the CPUC, to prepare and biennially update a statewide assessment of the electric vehicle charging infrastructure needed to support the levels of electric vehicle adoption required for the state to meet its goals of putting at least 5 million zero-emission vehicles on California roads by 2030 and of reducing emissions of GHGs to 40 percent below 1990 levels by 2030. The bill requires the CEC to regularly seek data and input from stakeholders relating to electric vehicle charging infrastructure. This bill supports the deployment of ZEVs as modeled in 2022 Scoping Plan Update.

TABLE IV.G-3B
MAJOR CLIMATE LEGISLATION AND EXECUTIVE ORDERS ENACTED SINCE THE 2017 SCOPING PLAN

Bill/Executive Order	Summary
Senate Bill 30 (SB 30) (Lara, Chapter 614, Statutes of 2018) *Insurance: Climate Change*	This bill requires the Insurance Commissioner to convene a working group to identify, assess, and recommend risk transfer market mechanisms that, among other things, promote investment in natural infrastructure to reduce the risks of climate change related to catastrophic events, create incentives for investment in natural infrastructure to reduce risks to communities, and provide mitigation incentives for private investment in natural lands to lessen exposure and reduce climate risks to public safety, property, utilities, and infrastructure. The bill requires the policies recommended to address specified questions.
Assembly Bill 2061 (AB 2061) (Frazier, Chapter 580, Statutes of 2018) *Near-zero-emission and Zero-emission Vehicles*	Existing state and federal law sets specified limits on the total gross weight imposed on the highway by a vehicle with any group of two or more consecutive axles. Under existing federal law, the maximum gross vehicle weight of that vehicle may not exceed 82,000 pounds. AB 2061 authorizes a near-zero- emission vehicle or a zero-emission vehicle to exceed the weight limits on the power unit by up to 2,000 pounds. This bill supports the deployment of cleaner trucks as modeled in this 2022 Scoping Plan Update.

The 2022 Scoping Plan Scenario identifies the need to accelerate AB32's 2030 target, from 40 percent to 48 percent below 1990 levels. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology. The Scoping Plan Scenario is summarized in Table 2-1 starting on page 72 of the Scoping Plan. It includes references to relevant statutes and Executive Orders, although it is not comprehensive of all existing new authorities for directing or supporting the actions described. Table 2-1 identifies actions related to a variety of sectors such as: smart growth and reductions in Vehicle Miles Traveled (VMT); light-duty vehicles (LDV) and zero-emission vehicles (ZEV); truck ZEVs; reduce fossil energy, emissions, and GHGs for aviation ocean-going vessels, port operations, freight and passenger rail, oil and gas extraction; and petroleum refining; improvements in electricity generation; electrical appliances in new and existing residential and commercial buildings; electrification and emission reductions across industries such as the for food products, construction equipment, chemicals and allied products, pulp and paper, stone/clay/glass/cement, other industrial manufacturing, and agriculture; retiring of combined heat and power facilities; low carbon fuels for transportation, business, and industry; improvements in non-combustion methane emissions, and introduction of low GWP refrigerants.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. California's Legislature and state agencies will continue to collaborate to achieve the state's climate, clean air, equity, and broader economic and environmental protection goals. It will be necessary to maintain and strengthen this collaborative effort, and to draw upon the assistance of the federal government, regional and local governments, tribes, communities, academic institutions, and the private sector to achieve the state's near-term and longer-term emission reduction goals and a more equitable future for all Californians. The Scoping Plan acknowledges that the path forward is not dependent on one agency, one state, or even one country. However, the State can lead by engaging Californians and demonstrating how action at the state, regional, and local levels of governments, as well as action at community and individual levels, can contribute to addressing the challenge.

Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The 2022 Scoping Plan Update discusses the role of local governments in meeting the State's GHG reductions goals. Local governments have the primary authority to plan, zone, approve, and permit how and where land is developed to accommodate population growth, economic growth, and the changing needs of their jurisdictions. They also make critical decisions on how and when to deploy transportation infrastructure, and can choose to support transit, walking, bicycling, and neighborhoods that do not force people into cars. Local governments also have the option to adopt building ordinances that exceed statewide building code requirements, and play a critical role in facilitating the rollout of ZEV infrastructure. As a result, local government decisions play a critical role in supporting state-level measures to contain the growth of GHG emissions associated with the transportation system and the built environment—the two largest GHG emissions sectors over which local governments have authority. The City has taken the initiative in combating climate change by developing programs and regulations such as the City's Green New Deal and Green Building Code. Each of these is discussed further below.

2. Page IV.G-30, modify the first sentence in Subsection (d) City of Los Angeles General Plan, as follows:

The City does not have a General Plan Element specific to climate change and GHG emissions, but several goals, objectives, or policies in the Air Quality Element, and Housing Element, Plan for Healthy LA, and Mobility Plan 2035 encourage the reduction of emissions ~~and its General Plan does not have any stated goals, objectives, or policies specifically addressing climate change and GHG emissions~~.

3. Page IV.G-31, add the following after Subsection (e) Traffic Study Policies and Procedures, as follows:

(f) City of Los Angeles All-Electric Buildings

Chapter IX of the LAMC also requires that all new buildings be all-electric buildings, with some exceptions. Equipment typically powered by natural gas such as space heating, water heating, cooking appliances and clothes drying would need to be powered by electricity for new construction. Exceptions are made for commercial restaurants, laboratory, and research and development uses. The LAMC is consistent with 2022 Title 24 goals of encouraging all-electric development which requires new residential uses to be electric-ready (wiring installed for all-electric appliances). Buildings in Los Angeles account for 43 percent of greenhouse gas emissions—more than any other sector in the City. These LAMC requirements ensure that new buildings being constructed are built to leverage the increasingly clean electric grid, which is anticipated to be carbon-free by 2035, rather than relying on fossil fuels.

4. Page IV.G-31, add the following after Subsection (f) City of Los Angels All-Electric Buildings, as follows:

(g) Mobility Plan 2035

In August 2015, the City Council adopted Mobility Plan 2035 (Mobility Plan), which serves as the City's General Plan circulation element. The City Council has adopted several amendments to the Mobility Plan since its initial adoption, including the most recent amendment on September 7, 2016.[74a] The Mobility Plan incorporates "complete streets" principles and lays the policy foundation for how the City's residents interact with their streets. While the Mobility Plan 2035 mainly relates to transportation, certain components would serve to reduce VMT and mobile source GHG emissions. One component of the Mobility Plan is a GHG emission tracking program to establish compliance with SB 375, AB 32 and the region's Sustainable Community Strategy.

[74a] *Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, approved by City Planning Commission on June 23, 2016, and adopted by City Council on September 7, 2016.*

5. Page IV.G-39, Subsection (1) CEQA Guidelines Appendix G, modify the 2nd to last sentence in the 2nd full paragraph, as follows:

Thus, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions, including CARB's 2017 Scoping Plan, CARB's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, City's Green New Deal, and the Los Angeles Green Building Code.

6. Page IV.G-40, add the following after the 1st paragraph in Subsection (1) Project Consistency with Applicable Plans and Policies, as follows:

(2) 2022 Scoping Plan Update

Appendix D, Local Actions, of the 2022 Scoping Plan Update includes "recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies (commonly referred to as climate action planning) and approval of new land use development projects, including through environmental review under the California Environmental Quality Act (CEQA)." (Page 4 of Appendix D.)

The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50% of jurisdictions do not have an adopted CAP, among other reasons because they are costly, requiring technical expertise, staffing, funding. Additionally, CAPs need to be monitored and updated as State targets change and new data is available. Jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). "By prioritizing climate action in these three priority areas, local governments can address the largest sources of GHGs within their jurisdiction." (Page 9 of Appendix D.)

The State also recognizes in Appendix D, Local Actions, of the Scoping Plan that each community or local area has distinctive situations and local jurisdictions must balance the urgent need for housing while demonstrating that a Project is in alignment with the State's Climate Goals. The State calls for the climate crisis and the housing crisis to be confronted simultaneously. Jurisdictions should avoid creating targets that are impossible to meet as a basis to determine significance. Ultimately, targets that make it more difficult to achieve statewide goals by prohibiting or complicating projects that are needed to support the State's climate goals, like infill development, low-income housing or solar arrays, are not consistent with the State's goals. The State also recognizes the lead agencies' discretion to develop evidence-based approaches for determining whether a project would have a potentially significant impact on GHG emissions.

7. Page IV.G-40, modify the subheading, (2) Quantification of Greenhouse Gas Emissions, as follows:

(~~2~~3) Quantification of Greenhouse Gas Emissions

8. Page IV.G-46, Subsection b) Operational Emissions, modify the 1st sentence of the 4th paragraph as follows:

As described in Section II., *Project Description*, the Project Site would include a total of ~~32~~ 22 light poles above the conforming 30-foot height limit based on the Project Site's zoning, not including the six relocated existing golf ball-shaped light standards that would be below the 30-foot height limit.

9. Page IV.G-47, modify the footnote no. 114 on page IV.G-47 as follows:

[114] Assumed total lighting poles/fixtures have a combined load of ~~122.62~~169.91 watts based on illuminance calculations provided for Project by Musco Lighting and that each LED screen requires a load of 739.2 watts and all lighting poles/fixtures and each screen conservatively assumed to be on for 4 hours a day for 323 days a year, which includes all weekdays, Sundays and 10 Saturdays. For complete list of assumptions refer to Appendix C of this Draft EIR.

10. Page IV.G-50, Subsection c) Project Design Features, modify GHG-PDF-1 as follows:

GHG-PDF-1: Solar Voltaic System. The Project will be designed to include solar voltaic panels providing ~~339,000~~ 281,000 ~~kilo Watt~~ kilowatt-hours (kWh) per year[122] on the roof of the gymnasium that would reduce the amount of electricity demand from City utilities.

(Footnote 122: The solar voltaic panel system would supply approximately ~~11.~~5 10.2 percent of the Project's energy demand. For complete list of assumptions refer to Appendix C of this Draft EIR and as updated in Appendix K of the Final EIR.)

11. Page IV.G-51, Subsection (a) Construction Emissions, modify Table IV.G-6, *Estimated Construction Greenhouse Gas Emissions,* as follows:

TABLE IV.G-6
ESTIMATED CONSTRUCTION GHG EMISSIONS

Annual Emission Source	**CO_2e (Metric Tons) [a,b]**
Construction Year 1	~~2,817~~ 2,682
Construction Year 2	~~5,516~~ 4,747
Construction Year 3	~~4,570~~ 4,570
Total	~~12,902~~ 11,999
Amortized Over 30 Years	~~430~~ 400

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix ~~C~~ K of ~~this Draft~~ the Final EIR.

[b] CO_2e emissions are calculated using the global warming potential values from the IPCC AR4.

SOURCE: ESA, 202~~1~~3.

12. Page IV.G-51, Subsection (a) Construction Emissions, modify the 1st sentence of the 1st paragraph as follows:

It is estimated that rough grading cut volumes would be ~~251,836~~ 199,000 cubic yards (unadjusted) and the fill volume would be ~~1,836~~ 2,000 cubic yards (unadjusted), for a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted)[123] of soil that would be hauled from the Project Site during the grading and excavation phase.

13. Page IV.G-53, Subsection (a) Construction Emissions, modify Table IV.G-7, *Estimated Operational Greenhouse Gas Emissions – Project*, as follows:

TABLE IV.G-7
ESTIMATED OPERATIONAL GREENHOUSE GAS EMISSIONS – PROJECT

	CO_2e at Buildout Year (2025) (Metric Tons per Year) [a]	
Emissions Sources	**Project with implementation of GHG reduction characteristics, features, and measures**	**Project without implementation of GHG reduction characteristics, features, and measures**
Project Operational		
Mobile Sources [b] (Includes VMT associated from both the Project and Community Use)	1,420	1,865
Area	<1	<1
Electricity	~~693~~ 717	~~972~~ 981
Natural Gas	93	94
Water and Wastewater Treatment	64	73
Solid Waste	19	19
Construction (Amortized)	~~430~~ 400	~~430~~ 400
Project Subtotal	~~2,719~~ 2,713	~~3,452~~ 3,431
Existing Site (refer to Table IV.G-5)	1,186	1,186
Net Total (Project minus Existing)	**~~1,533~~ 1,527**	**~~2,266~~ 2,245**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C of the Draft EIR and Appendix K of the Final EIR.

[b] As discussed in subsection IV.G.3.b) *Methodology,* while the community use component of the Project, which is classified as a community-serving recreational facility, is exempt from VMT analysis per LADOT's *Transportation Assessment Guidelines*, the emissions associated with VMT from the community use component of the Project were accounted for in the Project's operational emissions for the purposes of this GHG analysis, including from typical weekday community use. The Project's GHG analysis also accounted for annual VMT from occasional community use events that could occur during the year, including five Community Events with approximately 500 attendees per event. Factoring in these various uses, estimated operational GHGs associated with community uses account for more than two-thirds of the Project total. Refer to VMT data in Appendix C and Appendix M of this Draft EIR.

SOURCE: ESA, 202~~1~~3.

14. Page IV.G-54, Subsection (c) Comparison of Project GHG Emissions to Project Without Implementation of GHG Reduction Characteristics, Features, and Measures, modify the 1st paragraph of the subsection as follows:

When considering only the Project's emissions, Table IV.G-7 shows that the Project's operational emissions of ~~2,719~~ 2,713 $MTCO_2e$ would be generated primarily by mobile sources and secondarily by energy (electricity and natural gas) and in 2025 would be approximately 21 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures (i.e., based on the quantitative reduction, including those associated with Project Design Feature GHG-PDF-1). On a net GHG emissions basis (i.e., subtracting the existing site GHG emissions), the Project's net operational emissions of ~~1,533~~ 1,527 $MTCO_2e$ in 2025 would be approximately 32 percent below the net emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures (i.e., based on the quantitative reduction, including those associated with Project Design Feature GHG-PDF-1). The Project without implementation of GHG reduction characteristics, features, and measures does not account for land use characteristics of the Project that reduce VMT given its location at an urban infill location with nearby access to public transportation and does not account for energy savings beyond regulatory requirements, such as the Project's solar voltaic panels supplying ~~339,000~~ 281,000 kWh/year of renewable electricity (approximately ~~11.5~~ 10.2 percent of the Project's electricity demand).

15. Page IV.G-55, Subsection (c) Comparison of Project GHG emissions to Project \Without Implementation of GHG Reduction Characteristics, Features, and Measures, Optimize Building Energy Performance and Lower the CI of electricity, modify the 1st bullet point (partial top of page) as follows:

For the Project, these features account for approximately a ~~28.7~~ 26.9 percent reduction in electricity emissions and a ~~8.1~~ 7.7 percent reduction in total GHG emissions in the first operational year of 2025. For the Project, the lower CI of electricity also accounts for a ~~12.3~~ 12.7 percent reduction in emissions associated with Project water supply, treatment, and distribution and for wastewater treatment and a 0.3 percent reduction in total GHG emissions in the first operational year of 2025. Thus, the reduction in GHG emissions from optimizing building energy performance and lowering the CI of electricity would be ~~8.4~~ 8.0 percent of the total GHG emissions (detailed emissions calculations are provided in Appendix ~~C~~ K of ~~this Draft~~ the Final EIR).

16. Page IV.G-55, Subsection (c) Comparison of Project GHG emissions to Project \Without Implementation of GHG Reduction Characteristics, Features, and Measures, Reduction in vehicle trips and VMT associated with the Project's land use characteristics, modify the 1st full bullet point as follows:

- **Reduction in vehicle trips and VMT associated with the Project's land use characteristics.** As discussed above, based on the Project's land use characteristics, VMT reductions are expected due to the Project's infill nature, location, and design. These characteristics account for a ~~23.9~~ 23.8 percent

reduction in VMT and a ~~12.9~~ 13.0 percent reduction in total GHG emissions in the first operational year of 2025.

17. Page IV.G-55, Subsection c), Comparison of Project GHG emissions to Project \Without Implementation of GHG Reduction Characteristics, Features, and Measures, modify 2nd sentence of the 1st full paragraph as follows:

As described in Section IV.O.1, *Utilities and Service Systems –Water Supply,* the Project would implement the following water-saving features: the ~~one million~~ approximately 350,000-gallon stormwater capture and reuse system that ~~is expected to~~ would provide a ~~minimum of one-third~~ portion of the Project's total annual irrigation demand, consistent with the requirements of the LID Ordinance; replacing the existing uses with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass and reduction in water demand and avoid the use of pesticides; and maintaining 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused.

18. Page IV.G-60 and IV.G-61, Subsection (i), Energy and Water, modify the last sentence on the page of the 2nd bullet point as follows:

Additionally, as described in Section IV.O.1, *Utilities and Service Systems – Water Supply,* the Project would provide sustainability features, such as the ~~one million~~ approximately 350,000 gallon stormwater capture and reuse system that is expected to provide a ~~minimum of one-third~~ portion of the Project's total annual irrigation demand; replacing the existing uses with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass, thereby reducing water demand and avoiding the use of pesticides; and maintaining 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused, that would all reduce the Project's outdoor water demand; all of which would reduce the Project's GHG emissions associated with water conveyance and wastewater treatment.

19. Page IV.G-61, Subsection (i), Energy and Water, (ii) Mobile, modify the 2nd to last sentence of the 2nd Bullet point as follows:

In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of ~~30~~40 percent of the parking spaces, with ~~10~~ 13 percent of the LAMC-required spaces further improved with electric vehicle charging stations.

20. Page IV.G-62, Subsection (i), Energy and Water, (ii) Mobile, modify the last sentence of the 2nd Bullet point as follows:

The Project would also provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of ~~30~~ 40 percent of the parking spaces (approximately 160 spaces), with ~~10~~ 13 percent of the LAMC-required spaces further improved with electric vehicle charging stations (approximately 54 spaces).

21. Page IV.G-63, in Subsection (1) Impact Analysis, (a) CARB's Climate Change Scoping Plan, add the following after the bullet point in Subsection (iii) Solid Waste:

As discussed above, jurisdictions that want to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP should also look to the three priority areas. To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (transportation electrification, VMT reduction, and building decarbonization).[135a] A detailed assessment of goals, plans, and policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included above in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario).

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- **Convert local government fleets to zero-emission vehicles (ZEV)**

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127 which requires the CEC to analyze and examine charging needs to support California's electric vehicles (EVs) in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

[135a] *Table 1 of Appendix D, 2022 Scoping Plan Update, November 2022.*

The City's Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement was required to follow a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of

transitioning to EVs. Although this measure mainly applies to City fleets, the Project would not conflict with these goals by providing EV charging stations in both the underground and at-grade parking facilities for public visitors. The Project would provide a total of 403 parking spaces; 13 percent of these spaces (approximately 54 spaces) will include EV charging stations and 40 percent of these spaces (approximately 160 spaces) will include conduit and panel capacity for future EV charging stations.

- **Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)**

The State has adopted AB 1236 and AB 970 which requires cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to designate 30 percent of new parking spaces as capable of supporting future electric vehicle supply equipment (EVSE). This would exceed the CALGreen 2022 requirements of 20 percent of new parking spaces as EV capable. The ordinance also requires new construction to install EVSE at 10 percent of total parking spaces. This requirement also exceeds the CALGreen 2022 requirements of installing EVSE for 25 percent of EV capable parking spaces which is approximately five percent of total parking spaces. The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers.

The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. In addition, the Project would comply with the Scoping Plan goals of transitioning to EVs. The Project would support this GHG reduction strategy, even as a private development project, by providing EV charging stations in both the underground and at-grade parking facilities for Project-related and public visitors. The Project would provide a total of 403 parking spaces; 13 percent of these parking spaces (approximately 54 spaces) will include EV charging stations and 40 percent of these parking spaces (approximately 160 spaces) will include conduit and panel capacity for future EV charging stations. Additionally, the Project would designate a minimum of 8 percent of on-site parking for carpool and/or alternative-fueled vehicles further supporting transportation-related GHG reduction strategies.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- **Reduce or eliminate minimum parking standards in new developments**
- **Implement parking pricing or transportation demand management pricing strategies**

The City of Los Angeles Mobility Plan 2035 (Mobility Plan) which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within a half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards in order to reduce vehicle trips.

The Project would implement a comprehensive TDM Plan, which includes the use of shuttles between the Project Site and Upper School campus to reduce vehicle trips, and communication on ridesharing, bicycling, and transit routes/options to employees and visitors (TRAF-PDF-3). The Project's southern driveway, via Valleyheart Drive, would lead to both the below-grade parking structure and to a drop-off/pick-up roundabout area at the southeast corner of the Project Site, which will provide a convenient area to facilitate shuttle operations and ridesharing services. The south driveway would only allow entry into the subterranean garage, and all exits from the garage would be via the north driveway off Whitsett Avenue. The roundabout has been designed to accommodate buses, shuttles, and automobiles. The roundabout would lead to a 17-space, short-term surface parking lot near the parking structure's southern entrance. Rideshare vehicles would use the southern driveway (with roundabout) to access the surface parking lot. Moreover, the Project would provide a pedestrian connection to the Zev Greenway, which would further broaden the multimodal network. Additionally, to improve and incentivize pedestrian accessibility, the Project proposes a primary pedestrian entry on Whitsett Avenue near the north vehicle entrance driveway for users and visitors arriving on foot, bicycle, or public transportation. An additional pedestrian entrance gate would be located along Whitsett Avenue at the southern Project Site boundary, just north of LAFD Fire Station 78. Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter. These include a pedestrian entry gate located along Valley Spring Lane near the corner of Whitsett Avenue; three additional pedestrian entry gates on Valley Spring Lane opposite Teesdale, Beeman, and Babcock Avenues, respectively; one exterior pedestrian entrance gate at Bellaire Avenue and Valleyheart Drive; and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. The Project will also include an extensively planted, three-quarter mile long pedestrian pathway to circumnavigate the perimeter of the Project Site, providing opportunities for exercise, shaded areas and bench seating for relaxation, bird watching, dog walking, and general enjoyment of the natural environment. The network of publicly-accessible pathways and landscaped areas would connect with the Zev Greenway via a new ADA-compliant ramp. By improving and retrofitting the entryways serving the Project Site and the Zev Greenway, the Project would provide safer and more pedestrian access options, thus incentivizing pedestrian usage.

The Project proposes to provide 403 parking stalls – 386 stalls in a subterranean parking garage and 17 surface parking spaces, to facilitate on-site parking rather than parking on the adjacent residential streets. While the Project would include two parking spaces in excess of the Los Angeles Municipal Code (LAMC) minimum requirements, the Project

includes features to encourage walking and bicycling. Pursuant to the LAMC, the Project is required to provide 45 short-term and 23 long-term bicycle parking spaces. The Project would exceed LAMC requirements and provide 72 short-term and 28 long-term bicycle parking spaces. While the Project's parking would exceed the LAMC minimum requirements by two parking spaces, the Project would still be consistent with the overall intent of this GHG reduction policy through the Project's comprehensive TDM Plan.

- **Implement Complete Streets policies and investments, consistent with general plan circulation element requirements**

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015 consistent with California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. However, the Project would implement complete street policies by complying with general plan circulation element requirements by including features to encourage walking and bicycling. The Project would provide a pedestrian connection to the Zev Greenway, which would further broaden the multimodal network. Additionally, to improve and incentivize pedestrian accessibility, the Project proposes a primary pedestrian entry on Whitsett Avenue near the north vehicle entrance driveway for users and visitors arriving on foot, bicycle, or public transportation. An additional pedestrian entrance gate would be located along Whitsett Avenue at the southern Project Site boundary, just north of LAFD Fire Station 78. Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter. These include a pedestrian entry gate located along Valley Spring Lane near the corner of Whitsett Avenue; three additional pedestrian entry gates on Valley Spring Lane opposite Teesdale, Beeman, and Babcock Avenues, respectively; one exterior pedestrian entrance gate at Bellaire Avenue and Valleyheart Drive; and one exterior pedestrian entrance gate to the Project Site from the Zev Greenway. The Project will also include an extensively planted, three-quarter mile long pedestrian pathway to circumnavigate the perimeter of the Project Site. The network of publicly-accessible pathways and landscaped areas would connect with the Zev Greenway via a new ADA-compliant ramp. By improving and retrofitting the entryways serving the Project Site and the Zev Greenway, the Project would provide safer and more pedestrian access options, thus incentivizing pedestrian usage. The Project complies with complete street policies

and furthers their goals. Therefore, the Project would not conflict with implementation of Complete Streets policies.

- **Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.**
- **Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking**
- **Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)**
- **Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).**

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Section IV.D., Greenhouse Gas Emissions, of the Draft EIR provided a discussion of consistency with SCAG's 2020-2045 RTP/SCS.

On a local level, the City has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project proposes to repurpose a site currently occupied by a private nine-hole, 27-par golf course and tennis facility, for use as an athletic and recreational facility for its students, employees and the general public. The Project is not a mixed-use residential/commercial development that is often associated with density. While the Project would not increase the density of development near transit, the Project would increase access to public transit by providing pedestrian and bicycle improvements, including short-and long-term bicycle parking, in the Project area as described above and generally supports this GHG reduction strategy. Further, the Project Site is located near multiple transportation options, including LADOT's DASH Van Nuys/Studio City bus with stops at Whitsett Avenue/Valley Spring Lane located adjacent to the Project Site and the

Metro Local Line 167 with stops at Whitsett Avenue/Ventura Boulevard located 0.13 mile to the south of the Project Site. Other transit services include Metro BRT Line 750 and Local Line 150/240 bus Ventura Boulevard/Coldwater Canyon Avenue, which provide connections to the Metro B (Red) Line North Hollywood Station 2.25 miles to the east of the Project Site, which also serves the Metro G (Orange) Line. Furthermore, the Project would provide new open space and recreational amenities open to the public within convenient walking distance of a residential neighborhood.

The Project is not requesting to amend the zoning or development code because the proposed uses are allowed with a conditional use permit. Refer to Draft EIR, Section IV.J, *Land Use and Planning*, for additional details regarding requested zoning actions for the Project. The Project's transportation reduction improvements would not require additional zoning actions or zoning amendments.

The Project would not convert any natural and working lands to urban uses. The Project is an infill project that would provide spectators, visitors, students, and employees with the ability to access nearby public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and vehicle trips. Additionally, the Project would provide 72 short-term and 28 long-term bicycle spaces, to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods. Furthermore, the Project would provide open space and new recreational amenities open to the public within convenient walking distance of residential neighborhoods. The Project would also provide a publicly-accessible pathway, which would circumnavigate the Project Site and cover a distance of approximately 0.75 mile, allowing dog walking, recreation, relaxation, and observation of the natural setting and biodiversity around the Project Site.

While these reduction strategies mainly apply to traffic circulation infrastructure within the City, the Project would support these reduction strategies. Therefore, the Project would be consistent with these reduction strategies.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- **Adopt all-electric new construction reach codes for residential and commercial uses**

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the

State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-elective, which will reduce GHG emissions related to natural gas combustion. Under this All-Electric ordinance, equipment typically powered by natural gas such as space heating, water heating and cooking for non-restaurant would be required to be powered by electricity. In future years, the Los Angeles Department of Water and Power (LADWP) will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

Although this GHG reduction measure is aimed primarily at jurisdictions and not individual projects, the Project would support this measure by designing the Project to utilize energy efficient systems, including meeting or exceeding the energy standards in Title 24 Building Energy Efficiency Standards, and the CALGreen Code. Additionally, the Project would also include sustainability features, such as the 350,000-gallon stormwater capture and reuse system that would provide water for a portion of the Project's irrigation demand; utilizing artificial grass as a sustainable alternative to natural turf grass, reducing pesticide and water demand; and maintaining 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused, reducing the Project's outdoor water demand; all of which would reduce the Project's GHG emissions associated with water conveyance and wastewater treatment. The Project would utilize RIO-compliant species that use significantly less water compared to existing uses on the newly landscaped areas of the Project Site. The Project would utilize shielded, LED, timer-controlled technology lights for the fields, pool, and tennis courts and install a high-efficiency HVAC system. Therefore, the Project would be consistent and not conflict with the LAMC.

- **Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)**

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and LADWP has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy

Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project would support this measure by meeting or exceeding electricity requirements in the 2022 Building Efficiency Standards which encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, and strengthens ventilation standards. The Project includes Project Design Feature GHG-PDF-1: Solar Voltaic System. GHG-PDF-1 requires the Project to include 426 rooftop solar voltaic panels providing 281,000 kilowatt-hours (kWh) per year on the roof of the gymnasium to reduce the amount of electricity demand from City utilities by 10.2 percent. The Project would rehabilitate the existing clubhouse and café, which would result in energy efficiency improvements such as lighting that meets current energy efficiency standards. The Project would prepare a Rehabilitation Plan for the clubhouse to ensure and document compliance with the Secretary of the Interior's Standards for Rehabilitation (the Standards) and the City of Los Angeles Cultural Heritage Ordinance for properties that are designated Historic-Cultural Monuments (Los Angeles Administrative Code, Section 22.171.14).

In addition to energy efficiency measures, the Project would result in carbon sequestration benefits by planting 153 net new California native trees. The planting of trees sequesters CO_2 while the trees are actively growing, which typically occurs over a 20-year period.[135b] In addition, according to the United States Environmental Protection Agency (USEPA), trees help reduce urban heat island effects by shading building and ground surfaces, deflecting radiation from the sun, and releasing moisture into the atmosphere, which results in cooling through evapotranspiration.[135c] A supplemental analysis of the Project's carbon sequestration from trees is provided within Appendix C, Carbon Sequestration and Tree Canopy Study, of this Final EIR. As summarized on PDF pages 4 through 6 of 39 in the Carbon Sequestration and Tree Canopy Study, during Year 2 of Project operation, the annual CO_2 sequestration rate of the Project's replacement trees would be approximately equivalent to existing sequestration rates. Existing carbon sequestration for the trees to be removed by the Project is 44,633 pounds as shown in Figure 1, Annual Sequestration of Existing Trees and Palms, of the Carbon Sequestration and Tree Canopy Study (see PDF page 7 of 39 of Appendix C). Year 2 carbon sequestration rates for the Project's replacement trees would be 43,160 pounds, as shown in Figure 4, Year 2 Sequestration of Project Trees, of the Carbon Sequestration and Tree Canopy Study (PDF page 9 of 39 of Appendix C). After Year 2 of Project operation, the replacement trees would sequester CO_2 at increasingly greater rates than existing trees (existing trees to be removed sequester 44,633 pounds). Specifically, during Year 5 of Project operation, the replacement trees would sequester more than 73,000 pounds of CO_2 as shown in Figure 5, Year 5 Sequestration of Project Trees (see PDF page 10 of 39 of Appendix C). Sequestration would increase to 131,000 pounds in Year 10, as shown in Figure 6, Year 10 Sequestration of Project Trees, (see PDF page 10 of 39 of Appendix C). Over the lifetime of the Project's replacement trees, approximately 8.7 million pounds of CO_2 would be sequestered. In comparison, the existing trees to be removed would sequester 2.6 million pounds over their lifetime, if left in place. Final EIR Appendix C, Figures 1 and 2 provide lists of existing

individual tree species and the sequestration capacities of the individual species. Final EIR Appendix C, Figures 3 through 7 provide lists of the replacement and retained trees and the sequestration capacities of the individual species, which show Year 1, Year 2, Year 5, Year 10, and Lifetime sequestration of Project trees respectively. As with the tree canopy, the Project's higher amount of carbon sequestration is the result of the relatively poor biological characteristics of the existing tree mix, particularly the prevalence of Mexican fan palms. Mexican fan palms are comprised of fibrous strands and lack branches and extensive leaf systems that would, otherwise, support carbon sequestration. For example, a single mature Mexican fan palm (60-80' in height) is estimated to sequester 34 pounds of CO_2 per year. By contrast, a single Engelmann Oak or Valley Oak in a 48" box size would sequester 100 pounds of CO_2 in the first year alone following planting, more than three times that of a mature Mexican fan palm. Refer to the Carbon Sequestration and Tree Canopy Study in Appendix C of this Final EIR for additional details on the methodologies, data sources, and modeling conducted to determine the Project's projected future carbon sequestration of the Project's replacement trees on the Project Site. Thus, the Project would include climate beneficial components to sequester carbon and contribute to increased local cooling through evapotranspiration. Therefore, the Project would be consistent and not conflict with policies to implement energy efficiency retrofits.

[135b] *California Air Pollution Control Association, California Emissions Estimator Model (CalEEMod), User's Guide, Appendix A – Calculation Details for CalEEMod, page 58, May 2021.*

[135c] *U.S. Environmental Protection Agency, Reduce Urban Heat Island Effect, November 2, 2020, https://www.epa.gov/green-infrastructure/reduce-urban-heat-island-effect, accessed December 1, 2020.*

22. Page IV.G-64, Subsection (iv) Post-2030 Analysis, modify the 4th and 5th sentences in the 2nd paragraph as follows:

The Project would not conflict with these strategies given it would incorporate renewable energy measures, including Project Design Feature GHG-PDF-1, where the Project would be designed to include solar voltaic panels on the roof of the gymnasium to provide ~~339,000~~ 281,000 kWh/year of renewable electricity and reduce the amount of electricity drawn from City utilities and energy efficient measures, including water demand reduction measures as described in Section IV.O.1, *Utilities and Service Systems – Water Supply*, minimizing energy use to support efforts by its utility provider, LADWP, to obtain renewable energy pursuant to State mandates. Furthermore, the Project would support the priority market transformation strategy of zero-emission light-duty vehicles by providing for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of ~~30~~ 40 percent of the parking spaces, with ~~10~~ 13 percent of the LAMC-required spaces further improved with electric vehicle charging stations. As such, the Project would not conflict with the findings relevant to the Project from the updated California PATHWAYS model report.

23. Page IV.G-69, Subsection (iv) Energy Efficiency Strategies and Policies, modify the 3rd sentence in the 1st paragraph as follows:

The Project would provide at least ~~10~~ 13 percent of the total LAMC-required parking spaces with EV charging stations and ~~30~~ 40 percent of the total LAMC-required parking spaces provided to be capable of supporting future EVSE as dictated by City requirements.

24. Page IV.G-69, Subsection (iv) Energy Efficiency Strategies and Policies, modify the last two sentences in the 2nd paragraph as follows:

Furthermore, the Project would incorporate Project Design Feature GHG-PDF-1, which includes solar voltaic panels on the roof of the gymnasium that would provide ~~339,000~~ 281,000 kWh/yr of renewable electricity and reduce the amount of electricity demand from City utilities. The solar voltaic panels would be estimated to generate electricity equivalent to approximately ~~11.5~~ 10.2 percent of the Project's energy demand.

25. Page IV.G-69 and IV.G-70, Subsection (iv) Energy Efficiency Strategies and Policies, modify the 2nd sentence in the 3rd paragraph beginning on page IV.G-69 as follows:

In addition, as described in Section IV.O.1, *Utilities and Service Systems – Water Supply,* the Project would provide sustainability features, such as the ~~one~~ approximately 350,000-gallon stormwater capture and reuse system ~~that is expected to~~ would provide a ~~minimum of one-third~~ portion of the Project's total annual irrigation demand; replacing the existing uses with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass and reduction in water demand and avoid the use of pesticides; and maintaining approximately 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused, that would all reduce the Project's outdoor water demand, thereby reducing the Project's GHG emissions associated with water conveyance and wastewater treatment.

26. Page IV.G-71, Subsection (c) City's Green New Deal, modify the 3rd and 4th sentences of the 1st full paragraph as follows:

Furthermore, the Project would also result in GHG reductions beyond those specified by the City and would minimize its GHG emissions by implementing Project Design Feature GHG-PDF-1, which includes solar voltaic panels on the roof of the gymnasium that would generate ~~339,000~~ 281,000 kWh/yr of renewable electricity and reduce the amount of electricity demand from City utilities. The solar voltaic panels would offset approximately ~~11.5~~ 10.2 percent of the Project's electricity demand.

27. Page IV.G-72, Subsection d) Los Angeles Building Code, modify the 1st full paragraph as follows:

As described in Section IV.O.1, *Utilities and Service Systems – Water Supply,* the Project would provide additional sustainability features, such as ~~the one~~ a approximately

350,000-gallon stormwater capture and reuse system ~~that is expected to~~ that would provide a ~~minimum of one-third~~ portion of the Project's total annual irrigation demand; replacing the existing uses with new athletic and recreational facilities, including athletic fields utilizing artificial grass as a sustainable alternative to turf grass and reduction in water demand and avoid the use of pesticides; and maintaining 41 percent of the Project Site as pervious areas to allow water to reach below the top surface condition and be reused, which would all reduce the Project's outdoor water demand, thereby reducing the Project's GHG emissions associated with water conveyance and wastewater treatment.

10. Section IV.H. Hazards and Hazardous Materials

1. Page IV.H-47, Subsection (a) Subsurface Soil and Soil Gas Contamination, modify the 2nd to last sentence in the1st partial paragraph as follows:

As the Project would require grading and excavation of the Project Site, including a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted), these grading activities could result in the exposure of construction works to hazardous conditions associated with contaminated soils or soil vapor.

11. Section IV.I. Hydrology and Water Quality

1. Page IV.I-18 Subsection b), Existing Conditions, (1) Surface Water Hydrology (Drainage), (c) Project Site, modify the 2nd sentence of the 1st paragraph as follows:

The existing runoff rate during an 85th percentile storm event, referred to as the [Q85] value, on the existing Project Site is ~~1.4~~ 2.21 cfs.

2. Page IV.I-18 Subsection b), Existing Conditions, (1) Surface Water Hydrology (Drainage), (c) Project Site, Table IV.I-1, modify the table as follows:

TABLE IV.I-1
EXISTING DRAINAGE CONDITIONS DURING 85TH PERCENTILE AND 50-YEAR STORM EVENTS

Drainage Area	Area (Acres)	Percent Imperviousness (%)	Q_{85} (cfs) (volumetric flow rate measured in cubic feet per second)	Q_{50} (cfs) (volumetric flow rate measured in cubic feet per second)
A1	6.26	5	0.19	2420
A2	3.00	5	0.09	11.59
A3	3.20	5	0.11	12.37
A4	3.35	95	1.22	12.95
A5	1.39	95	0.60	5.37
Total	**17.2**	**30%**	**~~1.4~~ 2.21**	**54.9**

SOURCE: KPFF Consulting Engineers, Harvard-Westlake River Park Hydrology and Water Quality Report, February 2022, page 4. Provided in Appendix I of the Draft EIR.

3. Pages IV.I-18 and IV.I-19 Subsection b), Existing Conditions, (1) Surface Water Hydrology (Drainage), (c) Project Site, delete the last paragraph on page IV.I-18 that continues onto page IV.I-19 as follows:

~~The Project also would receive and treat stormwater runoff from an off-site area directly north of the Project (Area B. Since Area B is not part of the Project Site, it is not included in the existing drainage conditions presented in Table IV.I-1. This off-site drainage area is an approximately 38.64-acre area, consisting of single- and multi-family residential uses. This off-site drainage area is bounded by Moorpark Street to the north, Whitsett Avenue to the east, Bellaire Avenue to the west, and Valley Spring Lane to the south. The existing topography of the off-site drainage area slopes from north to south collecting in the southeastern corner of the off-site drainage area at Whitsett Avenue and Valley Spring Lane. The stormwater runoff then runs south along Whitsett Avenue to the catch basin located on the west side of the street at the intersection of Whitsett Avenue and Valleyheart Drive. Under existing conditions, during rainfall events and even with dry weather flows (such as residential landscape irrigation and car washing), runoff from the off-site drainage area sheet flows untreated and polluted water to an inlet that directs water into the Los Angeles River.~~

4. Page IV.I-27, Subsection c), Project Design Features, modify the 2nd sentence of the 1st paragraph as follows:

Project Design Feature WS-PDF-2 indicates the Project would capture, treat, and store up to ~~1 million~~ approximately 350,000 gallons of stormwater ~~and other urban~~ runoff ~~at a time~~ from the developed portions of the Project Site~~, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site,~~ through a stormwater LID capture and reuse cistern system, which will then use the treated stormwater for irrigation ~~or water features~~ on the Project Site.

5. Page IV.I-30, Subsection (b), Operational Impacts, modify the three paragraphs and Table IV.I-2, *Proposed Drainage Conditions During 85th Percentile Storm Event,* as follows:

As discussed under Existing Conditions above, the Project Site currently consists of five drainage areas. However, under the proposed Project conditions and as shown in **Figure IV.I-2**, *Proposed Site Drainage,* the 17.2-acre Project Site (Area A would be graded such that runoff would drain via building roof drains, surface flows, and area drains to the proposed LID BMP system, which includes a below grade hydrodynamic separator to clean the water of particles and contaminants, such as sediment, oil and grease, ~~pesticides~~ and other toxics. Ultimately, the treated stormwater would be stored in the ~~1 million-~~ approximately 350,000-gallon underground cistern system, where the treated water would be used for on-site irrigation ~~and water features~~ (refer to Project Design Feature WS-PDF-2).

~~In addition to capturing and reusing water from the Project Site (Area A), the Project's LID BMP system would also capture and reuse stormwater from a 38.64-acre off-site drainage~~

~~area (Area B) consisting of single- and multi-family residential uses to the north of the Project Site. The Project proposes to install a new curb inlet at the southwestern corner of Whitsett Avenue and Valley Spring Lane to intercept the off-site runoff before it drains into the County storm drain system. From this new inlet, stormwater would be conveyed on-site to the below grade hydrodynamic separator for water treatment and stored in the 1-million-gallon underground cistern system for reuse as Project Site irrigation.~~

Table IV.I-2, *Proposed Drainage Conditions During 85th Percentile Storm Event,* shows the volumetric flow rates generated by an 85th percentile storm event and a summary of post-Project imperviousness conditions for the Project Site (Area A)~~.~~ ~~and the off-site drainage area (Area B)~~. ~~The Project is not required to capture and reuse stormwater from Area B, but only from the on-site area (Area A). Accordingly, as~~ As shown in Table IV.I-2, the volume required to be captured and reused by the Project is 40,708 cubic feet, which equates to 304,517 gallons. Thus, the Project's ~~1-million~~ approximately 350,000-gallon underground cistern system significantly exceeds the City LID requirements.

TABLE IV.I-2
PROPOSED DRAINAGE CONDITIONS DURING 85TH PERCENTILE STORM EVENT

Drainage Area	Area (Acres)	Percent Imperviousness (%)	MV85th [a] (volume cubic feet/gallons)
On-Site - Stormwater Treatment Required by Project			
A	17.2	59.0	40,708 cf/ 304,517 gallons
~~**Off-Site – Stormwater Treatment Not Required for Project**~~			
~~B~~	~~38.6~~	~~80.0~~	~~118,380 cf/ 885,544 gallons~~

[a] MV85th = Mitigated volume of 85th percentile storm event

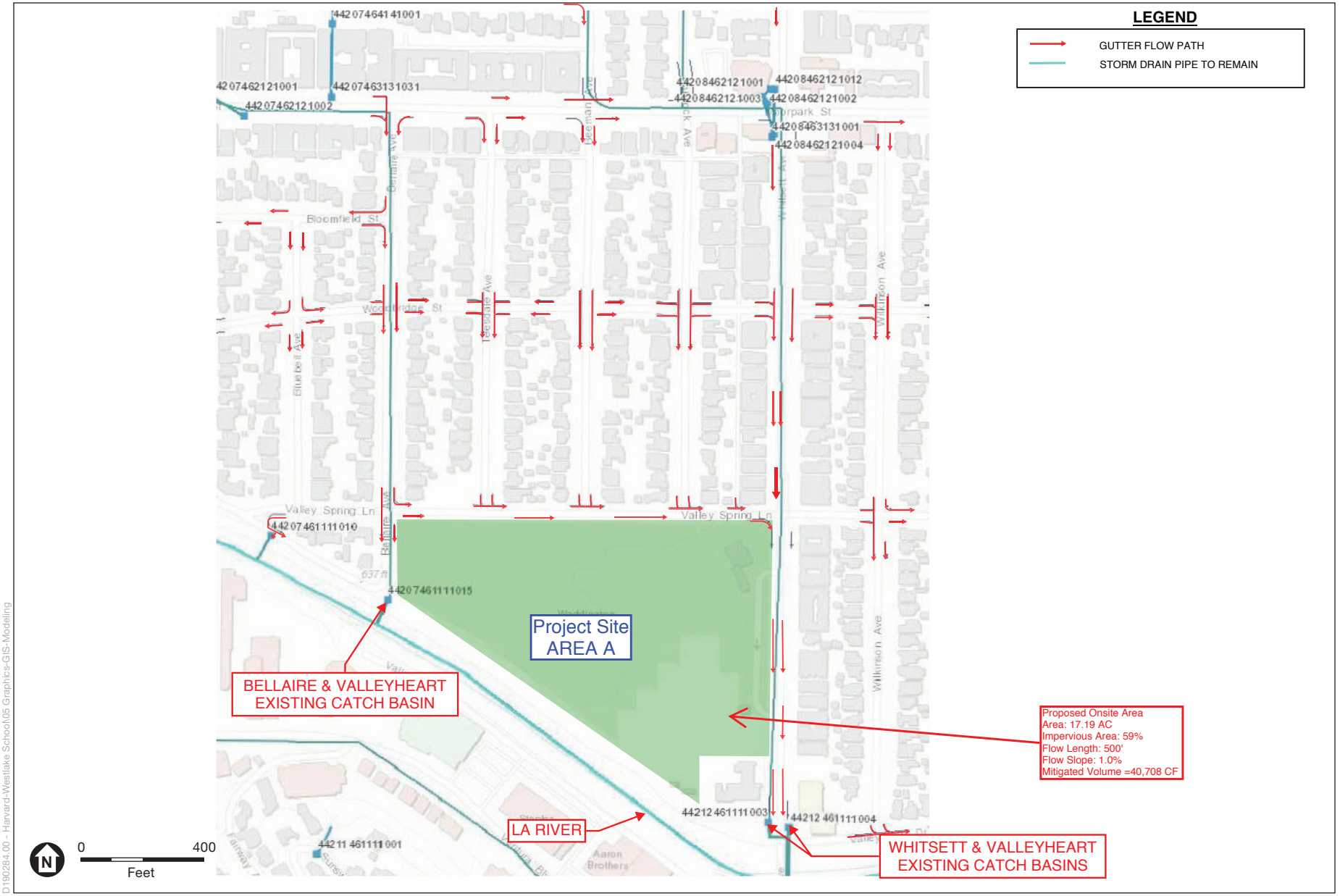
SOURCE: KPFF Consulting Engineers, Harvard-Westlake River Park Hydrology and Water Quality Report, February 2022, page 18. Provided in Appendix I of the Draft EIR.

6. Page IV.I-31, Figure IV.I-2, *Proposed Site Drainage*, is updated to remove the offsite drainage area (Area B).

   See Figure IV.I-2 on following page(s).

7. Page IV.I-32, Subsection (b), Operational Impacts, modify the 2nd paragraph as follows:

Under existing conditions, stormwater discharges from the Project Site ~~and the off-site drainage area (Area B)~~ sheet flows untreated water to an inlet(s) that directs water into the Los Angeles River. Because there is no existing system in place at the Project Site ~~or the off-site drainage area~~, upon Project buildout, fewer pollutants would be transported through the off-site stormwater conveyance systems into the Los Angeles River, which flows to the Pacific Ocean. Since there are currently no existing on-site BMPs, stormwater runoff during post-Project conditions would result in improved surface water quality.



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SOURCE: KPFF Consulting Engineers, Inc., 2023

Harvard-Westlake River Park Project

Figure IV.I-2
Proposed Site Drainage

8. Pages IV.I-34 and IV.I-35, Subsection (b), Operational Impacts, modify the 4th and 5th sentences in the 1st paragraph of this subsection on page IV.I-34 and continues onto page IV.I-35 as follows:

However, the Project would capture, treat, and store up to ~~1 million~~ approximately 350,000 gallons of stormwater at a time from the developed portions of the Project Site through the stormwater LID capture and reuse cistern system, which would then use the treated stormwater for irrigation ~~or water features~~ on the Project Site (refer to Project Design Feature WS-PDF-2). ~~Stormwater that is captured from the off-site drainage area would also be conveyed to the Project's cistern system and ultimately used for irrigation or water features~~.

9. Page IV.I-39, Subsection (iii), Exceed capacity of existing or planned stormwater drainage systems, modify the 2nd paragraph as follows:

The 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.~~ Therefore, no new off-site storm drainage infrastructure is required or proposed.

10. Page IV.I-42, Subsection (1) Impact Analysis, modify the 3rd sentence in the 2nd full paragraph as follows:

The detention would temporarily store the captured stormwater until the stored volume is entirely used for Project irrigation ~~or water features~~.

12. Section IV.J. Land Use and Planning

1. Page IV.J-19, Subsection (a), 2040-2045 RTP/SCS, modify the 2nd to last sentence in the 1st paragraph as follows:

The Project would not conflict with the strategy of the 2020-2045 RTP/SCS to focus development within an HQTA and would encourage pedestrian and bicycle access through the provision of new recreational opportunities on the Project Site that would serve the immediate neighborhood and vicinity, including 5.4 acres of landscaped ~~trails~~ pathways, bicycle parking, new ADA-friendly access to the Zev Greenway (a section of

the Los Angeles River Greenway), and installation of the off-site Coldwater Canyon Avenue Riverwalk Path Ramp accessing the Zev Greenway.

2. Page IV.J-19, Subsection (a), 2040-2045 RTP/SCS, modify the 1st sentence in the 3rd paragraph as follows:

Through improved collection of stormwater flowing to the Los Angeles River, primarily through the Project's ~~1 million~~ approximately 350,000-gallon collection system that would filter, retain, and reuse stormwater and other urban runoff, the Project would not conflict with 2020-2045 RTP/SCS strategies to support community resiliency to natural hazards, such as flooding.

3. Page IV.J-21, Subsection (b), City of Los Angeles General Plan Framework Element, modify the 4th sentence in the 2nd paragraph as follows:

The Project would contribute to the City's stormwater management system by capturing and treating surface water runoff ~~at Whitsett Avenue, upstream from the Project Site, as well as~~ throughout the approximately 17-acre Project Site. The management of currently uncontrolled surface flow from the ~~collection location on Whitsett Avenue would reduce potential flooding, as well as~~ Project Site would improve water quality flowing into the Los Angeles River~~,~~.

4. Page IV.J-22, Subsection (c), City of Los Angeles Open Space Element of the General Plan, modify the 3rd sentence of the 1st paragraph as follows:

As further described in Section IV.D, Cultural Resources, of this Draft EIR, the Project would retain all of the designated character-defining features of the Historical-Cultural Monument (HCM), Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically ~~PDF-~~CUL-PDF-1, Rehabilitation Plan, ~~PDF-~~CUL-PDF-2, Documentation, and ~~PDF-~~CUL-PDF-3, Interpretation.

5. Page IV.J-22, Subsection (c), City of Los Angeles Open Space Element of the General Plan, modify the 2nd paragraph as follows:

With respect to the goals and policies of the Open Space Element to conserve and/or preserve those open space areas containing the City's environmental resources, including air and water, the existing tennis courts and landscaped golf course within the Project Site constitute open space. With the provision of open space ~~trails~~ pathways under the Project and implementation of an extensive landscaping program, including the replacement of invasive and ornamental tree species with RIO District-compliant, native trees; a net increase of approximately 153 trees; and, substantial areas with new native and RIO District-compliant landscaping, the Project would conserve and expand the open space character and environmental resources on the Project Site. In addition, the Project's stormwater collection system would collect, filter, and store stormwater runoff from ~~Whitsett Avenue and~~ on-site sheet flow that would, otherwise, flow polluted and

untreated into the Los Angeles River (including the carrying of substantial amounts of pesticides, fertilizers, and fungicides currently required to maintain the golf course playing surfaces). As such, the Project would reduce surface water runoff and siltation during high storm events and improve the quality of water reaching the river. As such, the Project would not conflict with the goal of the Open Space Element to conserve open space areas and the City's water resources.

6. Page IV.J-25, Subsection (e), Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan, modify the 6th full sentence in 1st partial paragraph as follows:

Six additional exterior pedestrian entrance gates would be located along the Project Site perimeter. In total, there would be eight pedestrian entry gates along the perimeter of the Project Site that would provide access to the three-quarter mile path and 5.4 acres of publicly accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway and to on-site landscaped areas~~, water features,~~ and recreational facilities.

7. Pages IV.J-25 and IV.J-26, Subsection (f) Los Angeles River Revitalization Master Plan, modify the 3rd sentence in the 1st paragraph of this subsection that continues onto page IV.J-26 as follows:

The Project, which would provide 5.4 acres of publicly accessible open space and recreational uses, including landscaped ~~trails~~ pathways ~~and water features~~, seating, and use of tennis courts, pool, sports fields, and gymnasium facilities, would be consistent with broad goals for the Los Angeles River Revitalization Plan to provide recreation and open space and new ~~trails~~ pathways.

8. Page IV.J-26 and IV.J-27, Subsection (g) Los Angeles River Improvement Overlay District Ordinance, modify the last sentence on page IV.J-26 that continues onto page IV.J-27 as follows:

The Project would provide publicly accessible open space in proximity to the river, landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway, via an ADA-compliant pedestrian ramp, as well as install an ADA-compliant accessible pedestrian ramp leading to the Zev Greenway at Coldwater Canyon Avenue.

9. Page IV.J-27, Subsection (f), Los Angeles River Revitalization Master Plan, modify the 2nd sentence of 1st full paragraph as follows:

The Project would design and construct a stormwater collection and treatment system to collect rainwater and other ~~urban~~ runoff ~~at the corner of Whitsett Avenue and Valley Spring Lane, as well as~~ throughout the Project Site and proposed building roofs, including through the use of flow-through planters ~~and circulating water features~~ within the 5.4 acres of publicly accessible pathways and park areas.

10. Page IV.J-27, Subsection (f), Los Angeles River Revitalization Master Plan, modify the 4th full paragraph as follows:

By providing an ~~off-site (within the Whitsett Avenue and Valley Spring Lane intersection) and~~ on-site stormwater runoff collection system that would comply with the City's Low Impact Development (LID) Ordinance by reducing the rate of stormwater runoff and filtering improving water quality during storm events, the Project would not conflict with RIO District Ordinance policies to support the LID Ordinance and the City's Irrigation Guidelines.

11. Page IV.J-28, Subsection (h), Los Angeles Municipal Code, modify the bullet points as follows:

- Light Poles: Pursuant to LAMC Section 12.24 F, the following maximum heights for light poles ancillary to the athletic and recreational campus, in lieu of the 30-foot height limit otherwise required by LAMC Section 12.21.1 A.
  - ~~Two~~ Four ~~60~~ 55-foot-tall light poles on the ~~southe~~east and ~~south~~west sides of the pool facility.
  - ~~Three~~ Two 80-foot-tall light poles on the north side of Field B.
  - ~~One 60-foot-tall light pole on the east side of Field B.~~
  - Two ~~60-~~ 80-foot-tall light poles on the south side of Field B.
  - ~~One 70-foot-tall light pole on the south side of Field B.~~
  - ~~Three~~ Four ~~70~~ 80-foot-tall light poles on the west and east sideline~~s, and three 70-foot-tall light poles on the east sideline,~~ of Field A.
  - ~~Twelve~~ Ten 40-foot-tall light poles located on all four sides of the proposed tennis courts.

13. Section IV.K. Noise

1. Page IV.K-19, Subsection (2), Vibration Sensitive Receptors, modify the 7th sentence in the 1st paragraph as shown below. The added receptors are shown in Figure IV.K-3, *Sensitive Receptors*, and analyzed in the vibration impact analysis within Section IV.K, *Noise*, of the Draft EIR.

The structures in the vicinity of the Project Site are Category I (Los Angeles Fire Department (LAFD) Fire Station 78), Category II (Multi-family residential buildings and church use on the east side of Whitsett Avenue, east of the Project Site), and Category III (Single-family residential buildings on the north side of Valley Spring Lane, north of the Project Site, and single-family residential buildings on the west side of Bellaire Avenue, west of the Project Site).

2. Pages IIV.L-38 and V.K-39, Subsection C), Project Design Features, modify Project Design Feature NOI-PDF-1 as follows.

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

   - An 8- to 10-foot-high wall along portions of the northeastern and eastern sides of Field A.
   - An 8- to 11-foot-high wall along portions of the western and northern sides of Field B.
   - A ~~30~~ 14.5-foot solid overhead canopy above the swimming pool bleachers ~~and pool buildings~~.
   - An 8-foot-high solid wall along the northern edge of the tennis courts.

3. Page IV.K-39, Subsection C), Project Design Features, add the below listed Project Design Feature. NOI-PDF-4 is added to consistent with the events described in the Chapter II, *Project Description*, of the Draft EIR.

   NOI-PDF-4: Special Events. Harvard-Westlake will have no more than 30 school-related special events with the following limitations on attendance: No more than 27 special events per year of up to 500 people and no more than three (3) special events per year of up to 2,000 people.

4. Page IV.K-45, Subsection (ii), Athletic Activities, revise the 2nd sentence of the 1st paragraph as follows:

The swimming pool would be located along the northern portion of the Project Site in proximity to Valley Spring Lane set back from the northern Project Site boundary by approximately 95 feet and would be designed with a ~~30~~ 14.5-foot solid overhead canopy above the swimming pool bleachers ~~and pool buildings~~, which would provide acoustic shielding for noise sensitive receptors located to the north, east, and west of the Project Site.

5. Page IV.K-46, Subsection (ii), Athletic Activities, revise the 2nd full sentence through the end of the 1st partial paragraph as follows:

As presented in Table IV.K-12, the estimated noise levels from the outdoor athletic activities would range from ~~52.0 dBA~~ 52.1 dBA (Leq) at receptor location R2 to ~~64.7 dBA~~ 64.1 dBA (Leq) at receptor location R5, which would be below the significance threshold of 5-dBA (Leq) increase above the ambient noise levels. In addition to the Leq noise analysis (per the LAMC), noise impacts in terms of L_{10} impact noise metric were also evaluated representing the intermittent noise levels (e.g., cheering sound). **Table IV.K-13***, Athletic Activities Noise Levels – L_{10} Analysis*, presents the estimated outdoor athletic activities noise levels (in terms of L_{10}) at the off-site sensitive receptors. As indicated in Table IV.K-13, the estimated noise levels from the outdoor athletic activities would range from 58.1 dBA (L_{10}) at receptor location R2 to ~~68.9 dBA~~ 68.4 dBA (L_{10}) at receptor location R5, which would be below the

significance threshold of a 10-dBA increase above ambient noise levels. Noise calculations for outdoor athletic activities are provided in Appendix F of the Final EIR.

6. Page IV.K-46, Subsection (iii), Special Events, revise the 2nd sentence of the 1st paragraph as follows:

As specified in NOI-PDF-4, ~~School~~ school-related special events at Field A would include events, such as alumni reunions, parent receptions, school meetings, and parent association activities, which may reach up to 30 special events per year, 27 of which are conservatively assumed to have up to 500 people and three at 2,000 people.

7. Page IV.K-47, modify Table IV.K-12*, Athletic Activities Noise Levels – Leq Analysis*, as follows:

See Table IV.K-12 on following page

TABLE IV.K-12
ATHLETIC ACTIVITIES NOISE LEVELS – L_{EQ} ANALYSIS

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Uses, dBA (L_{eq})				Total Project Noise Levels, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold[a]	Exceedance over Significance Threshold	Significant Impact?
		Field A	Field B	Swimming Pool	Tennis Courts					
R1	50.5	40.6	51.1	~~46.6~~ 45.8	~~27.5~~ 25.1	~~52.7~~ 52.5	~~54.8~~ 54.6	55.5	0.0	No
R2	51.1	~~40.2~~ 40.6	50.1	46.7	~~27.1~~ 26.7	~~52.0~~ 52.1	54.6	56.1	0.0	No
R3	53.0	~~38.8~~ 42.9	51.4	~~48.5~~ 52.0	~~31.5~~ 30.5	~~53.4~~ 55.0	~~56.2~~ 57.1	58.0	0.0	No
R4	58.5	~~50.7~~ 50.9	~~46.4~~ 48.0	~~61.0~~ 59.0	~~42.0~~ 42.2	~~61.6~~ 60.0	~~63.3~~ 62.3	63.5	0.0	No
R5	64.6	54.3	~~41.8~~ 45.9	~~64.2~~ 63.5	~~36.8~~ 40.5	~~64.7~~ 64.1	~~67.6~~ 67.4	69.6	0.0	No
R6	64.6	55.1	~~40.7~~ 42.9	~~58.4~~ 59.9	~~32.9~~ 34.1	~~60.1~~ 61.2	~~65.9~~ 66.2	69.6	0.0	No
R7	57.1	45.5	45.2	~~49.9~~ 51.6	~~24.9~~ 25.1	~~52.2~~ 53.3	~~58.3~~ 58.6	62.1	0.0	No

NOTES:

[a] Significance thresholds are equivalent to the measured daytime or evening ambient noise levels, whichever is lower plus 5 dBA, per the City of Los Angeles Noise Regulations.

SOURCE: AES, 202~~2~~3

8. Page IV.K-48, modify Table IV.K-13, *Athletic Activities Noise Levels – L_{10}* Analysis, as follows:

TABLE IV.K-13
ATHLETIC ACTIVITIES NOISE LEVELS – L_{10} ANALYSIS

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Outdoor Uses, dBA (L_{10})				Total Project Noise Levels, dBA (L_{10})	Ambient (L_{eq})+ Project Noise Levels (L_{10}), dBA (L_{10})	Significance Threshold[a]	Exceedance over Significance Threshold	Significant Impact?
		Field A	Field B	Swimming Pool	Tennis Courts					
R1	50.5	51.4	~~56.6~~ 56.7	~~49.0~~ 47.9	~~30.5~~ 28.1	~~58.3~~ 58.2	~~59.0~~ 58.9	60.5	0.0	No
R2	51.1	~~50.9~~ 51.2	~~56.5~~ 56.4	~~49.1~~ 48.8	~~30.1~~ 29.7	58.1	58.9	61.1	0.0	No
R3	53.0	~~49.2~~ 53.4	~~57.3~~ 57.4	~~50.9~~ 54.2	~~34.5~~ 33.5	~~58.7~~ 60.1	~~59.8~~ 60.9	63.0	0.0	No
R4	58.5	~~61.2~~ 61.4	~~52.8~~ 54.3	~~63.3~~ 61.2	~~45.0~~ 45.2	~~65.7~~ 64.8	~~66.4~~ 65.7	68.5	0.0	No
R5	64.6	65.0	~~47.5~~ 50.6	~~66.5~~ 65.5	~~39.8~~ 43.5	~~68.9~~ 68.4	~~70.2~~ 69.9	74.6	0.0	No
R6	64.6	66.1	~~46.7~~ 47.9	~~60.8~~ 61.9	~~35.9~~ 37.1	~~67.3~~ 67.6	~~69.1~~ 69.3	74.6	0.0	No
R7	57.1	56.0	50.2	~~52.2~~ 53.6	~~27.9~~ 28.1	~~58.3~~ 58.6	~~60.7~~ 61.0	67.1	0.0	No

NOTES:

[a] Significance thresholds are equivalent to the measured daytime or evening ambient noise levels, whichever is lower plus 10 dBA.

SOURCE: AES, 202~~2~~3

9. Page IV.K-50, Subsection (iv) Parking Facilities, modify the 1st sentence of the paragraph as follows:

Parking for the Project would be provided on both a surface parking lot (~~29~~ 17 parking spaces) and below-grade parking structure (~~503~~ 386 parking spaces).

10. Page IV.K-56, Subsection (viii) Composite Noise Level Impacts from Project Operations, modify the 1st paragraph as follows:

Table IV.K-20, *Composite Noise Impacts*, presents the estimated noise from Project-related noise sources in terms of CNEL. As indicated in Table IV.K-20, the Project would result in ~~a maximum~~ increases of 2.2 dBA CNEL at receptor R1, 0.7 dBA CNEL at receptor R2, 1.2 dBA CNEL at receptor R3, 2.4 dBA CNEL at receptor R4, 1.7 dBA CNEL at receptor R5, 2.4 dBA CNEL at receptor R6, ~~to~~ 3.0 dBA CNEL at receptor R7,and 3.7 dBA CNEL at receptor R8. The increases in noise levels due to Project operations at off-site receptors R1 through R4, and R7 and R8 would be below the 5-dBA CNEL significance threshold, and the estimated noise levels would fall within the conditionally acceptable (60 to 70 CNEL) land use category for residential. The estimated noise level increase at off-site receptors R5 and R6 would be below the 3-dBA CNEL significance threshold, and the estimated noise levels would fall within the normally unacceptable (70 to 75 CNEL) land use category for residential and the normally unacceptable (70 to 80 CNEL) land use category for churches. Composite noise levels are provided in Appendix F of the Final EIR.

11. Page IV.K-57, Table IV.K-20, *Composite Noise Impacts*, modify the table as follows:

See Table IV.K-20 on following page

TABLE IV.K-20
COMPOSITE NOISE IMPACTS

Receptor Location	Calculated Project-Related Noise Levels, CNEL (dBA)						Project Composite Noise Levels, CNEL (dBA)	Ambient Noise Levels,[a] CNEL (dBA)	Ambient Plus Project Composite Noise Levels, CNEL (dBA)	Increase in Noise Levels Due to Project, CNEL (dBA)	Significance Threshold[b]	Significant Impact?
	Traffic	Mechanical	Athletic Activities	Parking	Special Events[c]	Coldwater Canyon Avenue Riverwalk Path Ramp						
R1	43.2	42.8	~~47.8~~ 47.5	10.3	48.0	-	~~52.1~~ 52.0	53.8	56.0	2.2	58.8	No
R2	43.6	42.7	47.2	10.9	46.4	-	51.4	59.1	59.8	0.7	64.1	No
R3	44.6	46.4	~~48.5~~ 50.3	13.0	48.9	-	~~53.5~~ 54.1	59.2	~~60.2~~ 60.4	~~1.0~~ 1.2	64.2	No
R4	48.4	43.5	~~57.3~~ 55.7	24.0	57.5	-	~~60.8~~ 60.1	61.4	~~64.1~~ 63.8	~~2.7~~ 2.4	66.4	No
R5	60.2	54.6	~~60.4~~ 59.8	22.5	60.4	-	~~65.5~~ 65.3	68.4	~~70.2~~ 70.1	~~1.8~~ 1.7	71.4	No
R6	60.2	52.9	~~55.6~~ 56.8	25.0	64.1	-	~~66.2~~ 66.3	67.7	70.1	2.4	70.7	No
R7	53.9	43.4	~~47.6~~ 48.8	24.4	55.1	-	~~58.1~~ 58.3	58.2	61.2	3.0	63.2	No
R8[d]	53.2	-	-	-	-	50.5	55.1	53.8	57.5	3.7	58.8	No

NOTES:

[a] Ambient in CNEL levels are estimated based on the short-term ambient noise measurements based on FTA procedures.

[b] Significance criteria are equivalent to the existing ambient plus 3 dBA if the estimated noise levels (ambient plus Project) fall within the "normally unacceptable" or "clearly unacceptable" land use categories or ambient plus 5 dBA if the estimated noise levels fall within the "normally acceptable" or "conditionally acceptable" land use categories, per the City of Los Angeles Noise Element. If the estimated noise levels exceed those significance criteria, a noise impact is identified.

[c] Based on estimated noise levels for the School-related special events, as conservative analysis.

[d] Coldwater Canyon Avenue Riverwalk Path Ramp noise (shown as CNEL) is evaluated independent of Project Site operational noise sources because it is further than 1,000 feet from the Project Site and would not contribute to increases in on-site operational noise from the Project Site. Traffic noise at receptor location 8 is based on the Project's incremental traffic noise level on Coldwater Canyon Avenue between Moorpark Street and Ventura Boulevard conservatively evaluated at 150 feet from the roadway centerline, which corresponds to the approximate location of the ambient noise measurement for receptor location R8.

SOURCE: AES, 202~~2~~3; ESA, 2022.

12. Page IV.K-63, Subsection (a) Structural Damage, (i) Construction, modify the 2nd paragraph as follows:

The existing clubhouse building, along with the adjacent putting green and brick wall with weeping mortar, located on the northeastern corner of the Project Site ~~is~~ are conservatively ~~considered a~~ analyzed as Category IV ~~building~~ structures (buildings extremely susceptible to vibration damage) for potential structural damage impacts. Grading, utilities and trenching, and landscaping construction activities would occur in the vicinity of the clubhouse, putting green, and brick wall with weeping mortar. Potential vibration-generating equipment are shown in Table IV.K-22. Per Project Design Feature CUL-PDF-1, ~~V~~vibratory rollers would not be used within ~~the immediate vicinity~~ 40 feet of the clubhouse, putting green, and brick wall with weeping mortar. Also, large dozers (300 horsepower and greater) and caisson drills would not be used on the Project Site within 25 feet of the clubhouse, putting green, and low brick wall with weeping mortar; loaded trucks would not be used on the Project Site within 20 feet of the clubhouse, putting green, and low brick wall with weeping mortar; and jackhammers would not be used on the Project Site within 12 feet of the clubhouse, putting green, and low brick wall with weeping mortar. ~~However, other equipment, such as dozers or loaded trucks, may be used within approximately 25 feet of the building.~~ Vibration levels at the above distances ~~25 feet for equipment that could be used in the immediate vicinity of~~ from the clubhouse, putting green, and brick wall with weeping mortar would be up to approximately ~~0.089~~ 0.11 inches per second PPV,[63b] which would not exceed the significance threshold of 0.12 inches per second PPV. Furthermore, as discussed in Chapter II, Project Description, the Project would rehabilitate the clubhouse as part of the Project to improve its usability and address deferred maintenance. The clubhouse would remain as part of the Project and function as a visitor center. Rehabilitation of the clubhouse that would occur as part of the Project would further improve the structural integrity of the building given its history of deferred maintenance. **Therefore, structural damage impacts to the clubhouse would be less than significant**.

[63b] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018. Based on the formula $PPV(D) = PPV(25\ ft) \times (25/D)^N$, PPV(25 ft) is equal to the reference vibration level at 25 feet, where D is equal to the distance, and where N is equal to the soil type classification factor (value of 1.5)

14. Section IV.L.1. Public Services – Fire Protection

1. Page IV.L.1-25, Subsection (ii), Emergency Access, modify the 2nd sentence of the 5th full paragraph as follows:

This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from ~~one of~~ the eastern LAFD driveway~~s~~ on Valleyheart Drive.

15. Section IV.L.3. Public Services – Parks and Recreation

1. Page IV.L.3-13, Subsection (a), Tennis Court Facilities, modify the 2nd paragraph of the subsection as follows:

As shown in **Table IV.L.3-3**, the current demand for the on-site tennis courts, on average, is ~~91~~ 96 one-hour sessions per weekday and ~~74~~ 78 sessions per weekend day. This indicates that the courts are not used to maximum capacity at any period throughout a typical weekday or weekend.

1. Page IV.L.3-14, Subsection (a), Tennis Court Facilities, Table IV.L.3-3, *Existing Use of On-Site Tennis Courts*, as follows:

TABLE IV.L.3-3
EXISTING USE OF ON-SITE TENNIS COURTS

Weekday Hours	**Average Number of Courts in Use**
7:00 a.m. to 8:00 a.m.	1 court, 1 session
8:00 a.m. to 11:00 a.m.	10 courts, 30 sessions
11:00 a.m. to 4:00 p.m.	5 courts, 25 sessions
4:00 p.m. to 8:00 p.m.	9 courts, 36 sessions
8:00 p.m. to 10:00 p.m.	2 courts, 4 sessions
Total Weekday Use	*96 sessions*
Weekend Hours	**Average Number of Courts in Use**
7:00 a.m. to 8:00 a.m.	4 courts, 4 sessions
8:00 a.m. to 11:00 a.m.	12 courts, 36 sessions
11:00 a.m. to 4:00 p.m.	6 courts, 30 sessions
4:00 p.m. to 8:00 p.m.	2 courts, 8 sessions
Total Weekend Use	*78 sessions*
Total Weekly Use	**~~174 sessions~~** **480 weekday sessions** **156 weekend sessions** **Total = 636 weekly sessions**

SOURCE: Harvard-Westlake School (Tennis Facilities Operator), 2021

2. Page IV.L.3-15, Subsection (b) Golf Course Facilities, add the below to end of the 1st partial paragraph:

Harvard-Westlake School is the current property owner and operator of the Project Site. The former Project Site owner/operator operated the facility for more than a decade prior to Harvard-Westlake School's ownership. Accordingly, Harvard-Westlake School is the source of all existing conditions information, such as the number and type of existing

facilities, existing floor areas, acreages for the Project Site and the leased parcels, existing operations, and other existing features.

3. Page IV.L.3-23, Subsection (b) Operation, modify the 4th full sentence in the 1st partial paragraph as follows:

As described in Chapter II, Table II-3, Public Use Days and Hours, of this Draft EIR, the clubhouse, café, and putting green, as well as the pedestrian path ~~and water features~~, would be open to the public daily from 7:00 a.m. to 9:00 p.m.

4. Page IV.L.3-23, Subsection (b) Operation, modify the 1st sentence of the 1st full paragraph as follow:

Further, the Project would include features that would reduce the demand for recreation and park facilities through the provision of walking ~~trails~~ pathways, which are the No. 1 recreational priority in the RAP 2009 Citywide Community Needs Assessment's South San Fernando Valley geographic area.

5. Page IV.L.3-23, Subsection (b) Operation, modify the 2nd full paragraph as follows:

The range of recreational uses provided by the Project, the full-time public access to walking ~~trails~~ pathways, and the improved access to the Zev Greenway under the Project would also meet the objective of the Community Plan to better utilize existing park and recreational facilities to promote a broader recreational experience for the community (Objective 4.1). In addition, the use of the Project for public trail access would fulfill the Community Plan's designation of the Project ~~Sire~~ Site as an "Opportunity Site" for future recreational use. Direct trail access through the publicly-access open space to the ~~Zen~~ Zev Greenway under the Project would improve accessibility to the Los Angeles River as recommended under Community Plan (Policy 4-1.2). Therefore, by meeting objectives that were developed based on recognized needs the Project would reduce demand on the area's parks and recreational facilities.

6. Page IV.L.3-24 and IV.L.3-25, Subsection (i), Reduction in Tennis Facilities, modify the 1st paragraph and Table IV.L.3-6, *Projected Capacity of Future, On-Site Tennis Courts*, as follows:

Table IV.L.3-6, *Projected Capacity of Future, On-Site Tennis Courts*, illustrates the average weekday and weekend use of the existing 16 tennis courts and the future capacity of the Project's eight tennis courts. As shown in Table IV.L.3-6, the existing tennis courts provide, on average, 96 sessions during a single weekday and 78 sessions during a weekend day, for a total week average of ~~174~~ 636 sessions. The future tennis courts would have the capacity to accommodate 88 sessions per weekday and ~~104~~ 112 sessions per weekend day, for a total week capacity of ~~192~~ 664 sessions. The table reflects the School's use of the tennis courts on weekdays between 3:00 p.m. and 6:00 p.m., which is a conservative assumption since the School would not use all eight courts

every weekday during the year, particularly during summer months and School breaks. In addition, outside the hours of 8:00 a.m. to 11:00 a.m. and 4:00 p.m. to 8:00 p.m., the Project's eight tennis courts would have capacity to accommodate the ~~same number of sessions as the current facility~~ existing demand for all other time blocks shown in Table IV.L.3-6. In addition, on weekends, there would be adequate capacity offered by the Project's eight courts, other than between the hours of 8:00 a.m. and 11:00 a.m. Although the weekday capacity would be 8 sessions below the existing average daily use, the weekend, during which the School would generally not conduct School-associated tennis, has a capacity of ~~26~~ 34 weekend sessions per day more than the current average use. As such, over a period of a week, the Project would have adequate capacity to accommodate the same number of tennis court sessions as the current Weddington Golf & Tennis facility.

TABLE IV.L.3-6
PROJECTED CAPACITY OF FUTURE, ON-SITE TENNIS COURTS

Weekday Hours	Average Courts in Use – Existing Conditions	Capacity of the Project's Tennis Courts
7:00 a.m. to 8:00 a.m.	1 court, 1 session	8 courts, 8 sessions
8:00 a.m. to 11:00 a.m.	10 courts, 30 sessions	8 courts, 24 sessions
11:00 a.m. to 4:00 p.m.	5 courts, 25 sessions	8 courts, 32 sessions (up to 3:00 p.m.)
4:00 p.m. to 8:00 p.m.	9 courts, 36 sessions	8 courts, 16 sessions (6:00 p.m. to 8:00 p.m.)
8:00 p.m. to 10:00 p.m.	2 courts, 4 sessions	8 courts, 8 sessions (up to 9:00 p.m.)
Total Weekday Use	*96 sessions*	*88 sessions*
Weekend Hours	**Courts in Use**	
7:00 a.m. to 8:00 a.m.	4 courts, 4 sessions	8 courts, 8 sessions
8:00 a.m. to 11:00 a.m.	12 courts, 36 sessions	8 courts, 24 sessions
11:00 a.m. to 4:00 p.m.	6 courts, 30 sessions	8 courts, 40 sessions
4:00 p.m. to ~~8:00~~ 9:00 p.m.	2 courts, 8 sessions (up to 8:00 PM)	8 courts, ~~32~~ 40 sessions
Total Weekend Use	*78 sessions*	*~~104~~ 112 sessions*
Total Weekly Sessions	**~~174 sessions~~** **480 weekday sessions** **156 weekend sessions** **Total = 636 weekly sessions**	**~~192 sessions~~** **440 weekday sessions** **224 weekend sessions** **Total = 664 weekly sessions**

SOURCE: Harvard-Westlake School (Tennis Facilities Operator), 2021

7. Page IV.L.3-27, Subsection (iii), Conclusion, modify the 1st paragraph of the subsection as follows:

As described above, the Project would provide all-day public access to 5.4 acres of landscaped walking ~~trails~~ pathways, 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.

8. Page IV.L.3-31, Subsection (e) Cumulative Impacts, modify the 6th sentence in the 2nd full paragraph as follows:

In addition, the Project would also provide approximately 5.4 acres of publicly accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway via a ramp and to on-site landscaped areas ~~and water features~~.

16. Section IV.M. Transportation

1. Page IV.M-26, Subsection C), Project Design Features, clarify in Project Design Feature TRAF-PDF-2 that only one of the driveways on Valleyheart Drive is used for egress by LAFD as follows:

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

2. Page IV.M-27, Subsection C), Project Design Features, clarify implementation of TRAF-PDF-3, with the following addition:

> **TRAF-PDF-3**: On days in which event attendance is expected to surpass 300 spectators, including parents and other spectators, students will not be permitted to drive to the Project Site and will be required to use the School's shuttle service. Shuttles will follow a prescribed driving route, travelling northbound on Coldwater Canyon Avenue, turning right at Moorpark Street, and turning right onto Whitsett Avenue. Spectators will park on the Project Site, and tickets and parking passes will be required to enter the Project Site. Spectators without a parking pass will be directed to park on the School's Upper Campus and ride the School-provided shuttles to the Project Site. Parking in the neighborhood will not be permitted and will be enforced by security personnel.
>
> A Parking and Transportation Management Plan will be employed by Harvard-Westlake School for all athletic competitions or Special Events that are expected to draw more than 300 attendees. The Parking and Transportation Management Plan will include appropriate tools to manage and control traffic and parking for competitions or events so that impacts to the surrounding areas

are minimized. Potential measures will include, but are not limited to, left-turn prohibition on Special Event days, a parking reservation system to manage attendance, off-site parking at the Harvard-Westlake Upper School campus, attendant-assisted parking, temporary increases in traffic management and parking personnel as needed, use of security personnel, signage, and other measures. This Plan will be submitted to LADOT for review and approval prior to the issuance of a Certificate of Occupancy for the Project. The Plan will be monitored for a minimum of three (3) years with annual monitoring reports submitted by the Harvard-Westlake School to LADOT for review.

3. Pages IV.M-28 and IV.M-29, Table IV.M-2, *Consistency of the Project with Applicable Policies and Programs of Mobility Plan 2035*, modify discussion of Project consistency with Policies 3.8. and 4.13 as follows:

3.8 – Bicycle Parking, Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** Pursuant to the LAMC, the Project is required to provide ~~45~~ 40 short-term and ~~23~~ 20 long-term bicycle parking spaces. The Project would provide 72 short-term and 28 long-term bicycle parking spaces to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods.
4.8 – Transportation Demand Management Strategies. Encourage greater utilization of Transportation Demand Management Strategies to reduce dependence on single-occupancy vehicles.	**No Conflict.** The Project would comply with the Citywide TDM Ordinance by providing transportation demand management and trip reduction measures as required by LAMC Section 12.26 J, Transportation Demand Management and Trip Reduction Measures. Also, the Project would provide shuttles to transport students (and, optionally, employees and spectators) between the Project Site and the Upper School Campus to reduce the vehicle trips arriving at the Project Site (see Project Design Feature ~~PDF-~~TRAF-PDF-3).
4.13 – Parking and Land Use Management. Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** Pursuant to the LAMC, the Project is required to provided ~~444~~ 401 vehicle parking stalls (one space per 5 seats of the total 2005 seats). The Project proposes to provide ~~532~~ 403 parking stalls – ~~503~~ 386 stalls in a subterranean parking garage and ~~29~~ 17 surface parking spaces, to facilitate on-site parking rather than parking on the adjacent residential streets. While the Project would include parking in excess of the LAMC minimum requirements, it would include features to encourage walking and bicycling and would provide more than the number of bicycle parking spaces required by LAMC. Moreover, the Project would provide a connection to the Zev Greenway, which would further broaden the multimodal network. Therefore, even though the Project's parking may exceed the minimum requirements, the Project would still be consistent with the overall intent of the Mobility Plan and this policy.

4. Page IV.M-30, Subsection (b), Bicycle Parking Ordinance, modify the paragraph as follows:

With regard to bicycle parking, LAMC Section 12.21 A.16 sets forth requirements for short-term and long-term bicycle parking for auditoriums based on the number of fixed seats (1 short-term bicycle space for every 50 fixed seats and 1 long-term bicycle space for every 100 fixed seats). The multipurpose gymnasium, the tennis courts, Field A, Field B, and the pool would have a combined number of ~~2,217~~ 2005 fixed seats. As such, the Project is required by the LAMC to provide ~~45~~ 40 short-term bicycle spaces and ~~23~~ 20 long-term bicycle spaces. The Project would provide 72 short-term and 28 long-term bicycle parking spaces to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods.

5. Pages IV.M-33 and IV.M-34, Table IV.M-3, *Consistency of the Project with Applicable Policies and Programs of the Community Plan*, modify discussion of Project consistency with Goals 11, 14 and15 as follows:

Goal 11: Encourage alternative modes of transportation to the use of single occupancy vehicles (SOV) in order to reduce vehicular trips. **Objective 11-1:** To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips**.** **Policy 11-1.1:** Encourage non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, walking, bicycles, etc.). **Policy 11-1.3:** Require that proposals for major new non-residential development projects include submission of a TDM Plan to the City.	**No Conflict.** The Project would comply with the Citywide TDM Ordinance by providing transportation demand management and trip reduction measures as required by LAMC Section 12.26 J, Transportation Demand Management and Trip Reduction Measures (see list of requirements under TDM Ordinance analysis, above). Also, the Project would be providing shuttles to transport students (and, optionally, employees and spectators) between the Project Site and the School's Upper Campus to reduce the vehicle trips arriving at the Project Site (see Project Design Feature ~~PDF-~~TRAF-PDF-3). In addition, the Project would be providing 72 short-term and 28 long-term bicycle spaces, exceeding LAMC requirements, to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods.
Goal 14: A system of safe, efficient, and attractive bicycle, pedestrian and equestrian facilities. **Objective 14-1:** To promote an adequate system of safe bikeways for commuter, school, and recreational use. **Policy 14-1.1**: Assure that local bicycle facilities are identified and linked with facilities of neighboring areas of the City. **Policy 14-1.2:** Encourage the provision of showers, changing rooms, and bicycle storage at new and existing non-residential developments and public places.	**No Conflict.** The Project Site frontages are across the river from the Los Angeles River Bicycle Path, which is part of the BEN. The Project proposes new pedestrian access between the Project Site and the Zev Greenway, which are linked to the Los Angeles River Bicycle Path near the intersection of the Zev Greenway and Coldwater Canyon Avenue northwest of the Project Site. The Project would provide ~~100~~ 72 short-term and 28 long-term bicycle parking spaces to promote bicycle connectivity between the Project Site, the Los Angeles River, and the surrounding neighborhoods. Showers and changing rooms would be available in the locker rooms for Harvard-Westlake students.

Goal 15: A sufficient system of well designed and convenient on-street parking and off-street parking facilities throughout the Plan Area. **Objective 15-1:** To provide parking in appropriate locations in accord with Citywide standards and community needs. **Policy 15-1.1:** Consolidate parking where appropriate, to minimize the number of ingress and egress points onto arterials. **Policy 15-1.3:** New parking lots and new parking garages shall be developed in accordance with design standards.	**No Conflict.** The Project proposes one primary parking structure to consolidate the parking. It would replace two existing driveways on Whitsett Avenue with one new driveway directly on Whitsett Avenue, which would minimize the number of ingress and egress points (curb cuts) onto Whitsett Avenue. The Project would provide a total of ~~532~~ 403 vehicle parking spaces, with ~~503~~ 386 spaces within a single-level underground parking structure and ~~29~~ 17 spaces on the surface parking area. The Project supports this policy by locating the surface parking at the rear, south side of the Project Site and the parking structure underground. The surface parking would be developed in accordance with applicable design standards.

6. Page IV.M-37, Subsection (h), Citywide Design Guidelines, modify the last sentence of the 1st partial paragraph as follows:

With its numerous pedestrian access points along the Project Site perimeter and public access to on-site ~~trails~~ pathways, the Project would not degrade the pedestrian experience (Guideline 2), and would actively engage with streets and public space and maintain human scale (Guideline 3)

7. Page IV.M-38 and IV-39, Table IV.M-4, *Consistency of the Project with Applicable Objectives of the Los Angeles River Design Guidelines,* modify discussion of Project consistency with Strategies 1-2, 1-8, 4- and 5-1 as follows:

Strategy 1-2: Activate the passageway or paseo so that they are safe and visually interesting spaces, using recycled water features, pedestrian-level lighting, artwork, benches, landscape or special paving	**No Conflict.** The Project would activate the new pedestrian connection to the Zev Greenway to be safe, accessible and interesting by providing landscaping along the path. The path would also connect to the landscaped areas on the Project Site, which would ~~have water features,~~ provide benches, wooded areas, and natural spaces open to the public. In addition, the Project would provide a pedestrian ramp to connect the Zev Greenway to Coldwater Canyon Avenue.
Strategy 1-8: Provide bicycle lockers and/or racks near river-facing building entrances.	**No Conflict.** The Project would provide ~~100~~ 72 short-term and 28 long-term bicycle parking spaces on the Project Site, including some near the new pedestrian path to the Zev Greenway.

Strategy 4-1: Place on-site parking so that it does not dominate the river corridor.	**No Conflict.** The Project would provide an underground parking structure, which would not be visible from the river corridor. ~~Twenty-nine (29)~~ Seventeen (17) parking spaces would be provided at-grade but would not be directly adjacent to or visible from the Zev Greenway and, thus, would not dominate the river corridor.
Strategy 5-1: Design cul-de-sacs, street ends, vacated streets, and remnant streets widths to provide pocket parks which can serve as gateways to the river while also assisting in the treatment and infiltration of stormwater as well as dry-weather run-off.	**No Conflict.** The Project is proposing a new roundabout at the end of Valleyheart Drive, which would be separate from the pedestrian access to the Zev Greenway. Otherwise, the Project is not designing a cul-de-sac, street end, vacated street, remnant street or pocket park that would serve a gateway to the river. Nonetheless, the Project includes an underground stormwater capture, treatment, and reuse system on the Project Site. The Project would capture and treat surface water runoff from ~~the Whitsett Avenue/Valley Spring Lane intersection and throughout~~ the Project Site. Runoff would be stored in a ~~one million~~ approximately 350,000-gallon underground tank and filtered prior to use as on-site irrigation or released into the in-street storm system (during periods of heavy rainfall when onsite stored capacity has been reached). Such storage and filtering would improve water quality and reduce the rate of runoff during storm events

8. Page IV.M-45, Subsection (b), Operation, modify the 3rd sentence of the 1st full paragraph as follows:

This warning light will be activated by a remote control button pressed by LAFD staff in the emergency vehicle when an emergency vehicle is approaching Valleyheart Drive from Whitsett Avenue or exiting from ~~one of~~ the eastern LAFD driveways on Valleyheart Drive.

17. Section IV.O.1. Utilities and Service Systems – Water Supply

1. Page IV.O.1-24, Subsection (2), Water Supply, modify the 1st sentence in the 2nd full paragraph as follows:

Implementation of Project Design Feature WS-PDF-2 will require the installation of a capture and reuse system; the water captured from this system will be reused for irrigation within the publicly accessible walking paths and wooded areas, which total 5.4 acres (235,224 square feet)~~, as well as for the Project's water features~~.

2. Page IV.O.1-24, Subsection c), Project Design Features, modify Project Design Feature WS-PDF-2 as follows:

   WS-PDF-2: Capture and Reuse System. The Project would capture, treat, and store up ~~to one million~~ approximately 350,000 gallons of stormwater ~~and other urban~~ runoff ~~at a time~~ from the developed portions of the Project Site~~, as well as from an approximate 38.64-acre off-site drainage area to the north of the Project Site,~~ through a stormwater Low Impact Development (LID) capture and reuse cistern system, which will then use the treated stormwater for irrigation ~~or water features~~ on the Project Site.

3. Page IV.O.1-28, Subsection (b), Operation, modify the 3rd paragraph as follows:

Per Project Design Feature WS-PDF-2, stormwater and other urban runoff would be captured, treated, and stored in the ~~1-~~ approximately 350,000-gallon underground cistern system, where the treated water would be used for on-site irrigation ~~and water features~~. Depending on rainfall frequency and volume, a ~~minimum of one-third~~ portion of the Project's ~~total annual~~ irrigation demand ~~is expected to~~ would be provided by the Project's ~~1 million~~ approximately 350,000-gallon stormwater capture and reuse system. Thus, with Project Design Feature WS-PDF-2, the Project's irrigation demand would be reduced. The evaluation of the Project's irrigation demand does not account for the use of water from the stormwater capture and treatment system~~., at minimum, to 6,064 gpd or 6.8 afy; and, the Project's overall water demand would be reduced to 36,885 gpd or 41.31 afy~~.

18. Section IV.O.3. Utilities and Service Systems – Solid Waste

1. Page IV.O.3-14, Subsection (a) Construction, modify the 2nd sentence of the 1st paragraph as follows:

During the excavation phase, the Project would include the export of approximately ~~250,000~~ 197,000 cubic yards (cy) of excavated soil (associated with excavation for new building foundations, subterranean parking, and stormwater capture and reuse system).

2. Page IV.O.3-15, Table IV.O.3-2*, Estimated Construction Solid Waste Generation for the Project*, modify the table data as follows:

TABLE IV.O.3-2
ESTIMATED CONSTRUCTION SOLID WASTE GENERATION FOR THE PROJECT

Debris Type	Quantity	Generation Factor	Waste Generation (tons)
Site Preparation, Grading and Excavation			
Building Demolition Material	1,000 sf	0.0463 tons/sf[a]	46
Hardscape Demolition	187,684 sf (10,368 cy)	2,400 lbs/cy[b]	12,442
Site Preparation Phase (vegetation and earthwork removal)[d]	6,532 cy	3,000 lbs/cy[c]	9,798
Excavation Phase (exported soil)[e]	~~250,000~~ 197,000 cy	3,000 lbs/cy[c]	~~375,000~~ 295,500
Site Preparation, Grading and Excavation Subtotal	--	--	~~397,286~~ 317,786
Building Construction			
Total New Building Area	94,554 sf	4.39 lbs/sf[f]	208
Total (pre-diversion)[g]			**~~397,493~~ 317,994**
Total (post-diversion)[h]			**~~99,373~~ 79,499**

sf = square feet; cy = cubic yards

[a] One square-foot represents 0.0463 tons of waste material. CalEEMod User's Guide, Appendix A, October 2017, page 13.

[b] Based on the CalRecycle Solid Waste Cleanup Program Weights and Volumes for Project Estimates - Construction Debris, Asphalt or Concrete: Loose, https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/, accessed December 11, 2020.

[c] Based on the CalRecycle Solid Waste Cleanup Program Weights and Volumes for Project Estimates – Excavated/Wet, https://www.calrecycle.ca.gov/SWFacilities/CDI/Tools/Calculations/, accessed December 11, 2020.

[d] Vegetation and earthwork material includes vegetation and soils associated with sod and vegetative growth.

[e] Exported soil during the excavation phase is associated with excavation for new building foundations, subterranean parking, and stormwater capture and reuse system.

[f] Generation factors provided by the USEPA, Estimating 2003 Building-Related Construction and Demolition Materials Amounts, Tables A-1, A-2, and A-3, 2003.

[g] Totals may not add up due to rounding.

[h] Based on the required diversion rate of 75 percent for C&D waste per the Los Angeles Green Building Code.

SOURCE: ESA, 202~~2~~3.

3. Page IV.O.3-14, Subsection (a), Construction, modify the 2nd paragraph as follows:

Table IV.O.3-2, *Estimated Construction Solid Waste Generation for the Project,* provides an estimate of the amount of construction and demolition debris that would be generated during Project construction. As shown in Table IV.O.3-2, Project construction activities would generate an estimated ~~397,493~~ 317,994 gross tons of waste prior to the diversion of 75 percent of waste required by SB 1374 and required reductions associated with

compliance with the Los Angeles Green Building Code (e.g., use of recyclables in building construction, etc.).

4. Page IV.O.3-16, Subsection (a), Construction, modify the 2nd and 3rd full paragraphs as follows:

In compliance with the requirements of SB 1374 and Waste Hauler Permit Program, Harvard-Westlake School would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Assuming the required C&D diversion rate of 75 percent per SB 1341 and Waste Hauler Permit Program, the Project is estimated to generate a total of ~~99,373~~ 79,499 tons of C&D waste. Additionally, the Project's construction contractor would deliver all C&D waste generated by the Project to a certified C&D Waste Processing Facility in accordance AB 939 Compliance Permit requirements, which is expected to further increase the diversion rate.

As indicated above, the remaining capacity of the Azusa Land Reclamation landfill is estimated at 47.07 million cubic yards (58.84 million tons) with a projected closure date of 2046.[40] The Project's construction-generated solid waste disposal after 75-percent diversion would represent ~~0.17~~ 0.14 percent[41] of the estimated remaining capacity at this particular County's landfill alone, which does not take into consideration existing capacity at other sites within the County and out-of-county that could potentially accept Project C&D waste. Other facilities, such as Hanson Aggregates West, Inc and United Rock Products Pit #2 in Irwindale, accept up to 4,006 and 3,846 tons per day, respectively, of inert solid waste materials.[42] Such facilities could also be utilized by the Project when disposing of C&D waste materials. As such, multiple facilities would be available to accommodate the C&D waste from the Project.

(Footnote 41: The Project would generate approximately ~~99,373~~ 79,499 tons of solid waste from construction post-diversion. ~~99,373~~ 79,499 tons / remaining capacity at Azusa of 58.84 million tons would result in ~~0.17~~ 0.14 percent.)

19. Chapter V. Alternatives

1. Page V-3, Subsection 2. Objectives of the Project, modify Objective 8 as follows:

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.

2. Page V-4, Subsection 3, Overview of Selected Alternatives, modify the last three sentences in the 1st partial paragraph as follows:

The Project would also provide 5.4 acres of publicly accessible open space and ~~trails~~ pathways. 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~~ 386 parking space below-grade parking structure in the eastern portion of the Project Site, and a ~~one million~~ approximately 350,000-gallon stormwater capture and reuse system.

3. Page V-5, Subsection 3, Overview of Selected Alternatives, Table V-1, *Overview of the Analyzed Alternatives*, modify the selected rows shown below as follows:

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~~ 386 spaces	No 0 spaces	No 0 spaces	No 0 spaces	Yes ~~503 spaces~~ 386 spaces
At Grade Parking	~~29 spaces~~ 17 spaces	0 spaces	~~532~~ 403 spaces	~~430~~ 433 spaces	~~29 spaces~~ 17 spaces
Soil Export (in cubic yards)	~~250,000~~ 197,000	0	123,223	90,100	~~238,100~~ 185,100
Soil Export Haul Truck Trips	~~35,714~~ 28,142	0	17,604	12,872	~~34,014~~ 26,442

4. Page V-10, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (b) Air Quality, (i) Consistency with Air Quality Management Plan, (a) Construction, modify the 5th and 6th sentences in the 1st paragraph as follows:

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.

5. Page V-16, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (c) Biological Resources, (iv) Conflict with Policies or Ordinances Protecting Biological Resources, modify the 5th sentence in the 1st paragraph as follows:

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~~.

6. Page V-19, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (e) Energy, (i) Construction, modify the 4th sentence in the 1st paragraph as follows:

The Project's export of ~~250,000~~ 197,000 cubic yards of excavated materials, one component of construction activity, would require ~~35,714~~ 28,142 haul truck trips.

7. Page V-19, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (e) Energy, (ii) Operation, modify the 4th sentence in the 1st paragraph as follows:

The Project's annual average operational electricity usage would be approximately ~~2,617,043~~ 2,675,043 kWh.

8. Page V-20, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (f) Geology and Soils, (ii) Soil Erosion and Loss of Topsoil, modify the 4th sentence in the paragraph as follows:

The Project would generate ~~251,836 cubic yards of rough cut and fill (including 250,000~~ 197,000 cubic yards of exported cut materials~~)~~.

9. Page V-22, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (g) Greenhouse Gas Emissions, (i) construction, modify the 2nd sentence in the paragraph as follows:

As evaluated in Section IV.G, *Greenhouse Gas Emissions*, of this Draft EIR, under the Project, hauling of approximately ~~250,000~~ 197,000 cubic yards of exported excavated materials, concrete pours, deliveries, worker trips, and on-site construction equipment would result in GHG emissions.

10. Page V-24, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (h) Hazards and Hazards and Hazardous Materials, (ii) Accidental Release of Hazardous Materials, modify the 5th sentence in the paragraph as follows:

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~~ 197,000 cubic yards of excavated soil.

11. Page V-27, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (i) Water Quality Standards and Groundwater Quality, (b) Operation, modify the 5th through 7th sentences in the paragraph as follows:

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.

12. Page V-28, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (ii) Changes in Groundwater Supplies and Recharge, (b) Operation, modify the 3rd sentence in the partial paragraph as follows:

However, the Project would capture, treat, and store up to ~~one million~~ approximately 350,000-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-PDF-2).

13. Page V-29, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows, (b) Operation, delete the 6th and 7th sentences in the paragraph as follows:

~~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.~~

14. Page V-34, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (b) Operation, modify the 7th sentence in the paragraph as follows:

Furthermore, the Project would provide all-day public access to 5.4 acres of landscaped walking ~~trails~~ pathways, 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.

15. Page V-37, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (m) Transportation, (iv) Emergency Access, (a) Construction, modify the 4th sentence in the paragraph as follows:

The Project would involve the export of ~~250,000~~ 197,000 cubic yards of excavated materials, which would generate ~~35,714~~ 28,142 haul truck trips.

16. Page V-41, Subsection a), Alternative 1: No Project/No Building Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (iii) Solid Waste, (a) Construction, modify the 1st full sentence in the paragraph as follows:

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~~ 317,994 tons (pre-diversion) and ~~99,373~~ 79,499 net tons (post-diversion) of construction and demolition (C&D) waste for landfill disposal.

17. Pages V-41 and V-42, Subsection b), Alternative 2: At Grade Parking Alternative, (1) Description of the Alternative, modify the 1st paragraph as follows:

Alternative 2 would eliminate the ~~503~~ 386-space subterranean garage and the ~~one-million-~~ approximately 350,000-gallon underground stormwater capture and reuse system. Under Alternative 2, the Project's 17-space surface parking lot would be retained and the one level of subterranean vehicle parking spaces would be relocated to at grade (also ~~503~~ 386 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~~ 80 feet above the elevated field, or approximately ~~85~~ 95 feet above grade. In lieu of the Project's ~~one-million~~ approximately 350,000-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.

18. Page V-42, Subsection b), Alternative 2: At Grade Parking Alternative, (1) Description of the Alternative, modify the 5th sentence in the 1st full paragraph as follows:

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~~ 17-space, short-term surface parking lot would be retained under Alternative 2.

19. Page V-42, Subsection b), Alternative 2: At Grade Parking Alternative, (1) Description of the Alternative, modify the 2nd full paragraph as follows:

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 have a~~ net cut/fill volume would be ~~of~~ approximately ~~250,000~~ 197,000 cubic yards (unadjusted). A total of ~~17,857~~ 14,071 trucks or ~~35,714~~ 28,142 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~~ approximately 350,000-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~~ 197,000 cubic yards to 123,223 cubic yards (8,802 trucks or 17,604 truck trips), which is a reduction of ~~126,777~~ 73,777 cy (~~114,877~~ 197,000 cubic yards ~~11,900~~ minus 123,223 cubic yards) or ~~9,055~~ 5,270 trucks or ~~18,110~~ 10,540 truck trips.

20. Page V-43, Subsection b), Alternative 2: At Grade Parking Alternative, (1) Description of the Alternative, modify the 2nd paragraph as follows:

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~~ 80 feet for Field A under the Project would be adjusted to ~~85~~ 95 feet to allow for lighting of the elevated field.

21. Page V-44, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (b) Air Quality, (i) Consistency with Air Quality Management Plan, (a) Construction, modify the 3rd and 4th sentences as follows:

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.

22. Page V-49, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (c) Biological Resources, (iv) Conflict with Policies or Ordinances Protecting Biological Resources, modify the paragraph as follows:

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~~ Nevertheless, Alternative 2 would comply with applicable LAMC LID requirements~~, it would only~~ and 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 similar and 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.~~

23. Page V-51, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (e) Energy, (i) Construction, modify the 2nd sentence of the paragraph as follows:

One aspect of the construction phase, the export of excavated materials, is expected to require ~~35,714~~ 28,142 truck trips to haul ~~250,00~~ 197,000 cubic yards of materials under the Project, and 17,60~~0~~4 truck trips to haul 123,223 cubic yards of materials under Alternative 2.

24. Page V-52, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (e) Energy, (ii) Operation, modify the 2nd to 4th sentences of the paragraph as follows:

Alternative 2 and the Project's annual average operational electricity usage would be similar at approximately ~~2,617,043~~ 2,675,043 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~~ 132,955 gallons of gasoline and 14,756 gallons of diesel.

25. Page V-52, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (f) Geology and Soils, (ii) Soil Erosion and Loss of Topsoil, modify the 2nd sentence of the paragraph as follows:

By eliminating the Project's subterranean parking garage and ~~one-million~~ approximately 350,000-gallon stormwater treatment system, Alternative 2 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to 123,223 cubic yards, which is a reduction of ~~126,777~~ 73,777 cubic yards.

26. Page V-54, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (g) Greenhouse Gas Emissions, (i) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

The Project would result in a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted), which would require a total of ~~17,857~~14,071 trucks or ~~35,714~~ 28,142 soil haul truck trips (to and from the Project Site). Alternative 2 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to 123,223 cubic yards~~-~~, requiring 8,802 trucks or 17,604 truck trips, which is a reduction of ~~126,777~~ 73,777 cubic yards and ~~9,055~~ 5,270 trucks or ~~18,110~~ 10,540 truck trips.

27. Page V-56, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (h) Hazards and Hazardous Materials, (ii) Accidental Release of Hazardous Materials, modify the 2nd sentence of the 2nd paragraph in the subsection as follows:

The Project would result in ~~a rough cut/fill volume of 251,836 cubic yards and~~ the export of ~~250,000~~ 197,000 cubic yards of material; whereas Alternative 2 would result in the export of 123,223 cubic yards of material.

28. Page V-58, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (i) Water Quality Standards and Groundwater Quality, (b) Operation, modify the paragraph as follows:

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~~ approximately 350,000-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 and similar. ~~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.~~

29. Page V-59, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (ii) Changes in Groundwater Supplies and Recharge, (b) Operation, modify the paragraph as follows:

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~~ approximately 350,000-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~~ approximately 350,000-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.

30. Page V-60, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows, (b) Operation, modify the two paragraphs as follows:

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 and similar. ~~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.~~

31. Page V-61, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (k) Noise and Vibration, (i) Construction, modify the last sentence in the 2nd paragraph as follows:

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 2~~3~~.

32. Page V-65, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (b) Operation, modify the 2nd sentence of the 1st paragraph as follows:

Alternative 2 and the Project would include the same athletic fields, gymnasium, swimming pool, tennis courts and ~~a~~ relatively similar publicly accessible ~~trail system~~ walking pathways.

33. Page V-65, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (b) Operation, modify the 1st sentence of the 2nd paragraph as follows:

Furthermore, the Project and Alternative 2 would provide all-day public access to 5.4 acres of landscaped walking ~~trails~~ pathways, 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.

34. Page V-67, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (m) Transportation, (iv) Emergency Access, (a) Construction, modify the 4th sentence in the paragraph as follows:

Alternative 2 would export 123,223 cubic yards of excavated materials, which would generate 17,60~~0~~4 truck trips. The Project would export ~~250,000~~ 197,000 cubic yards of excavated materials, which would generate ~~35,714~~ 28,142 haul truck trips.

35. Page V-69, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (i) Water Supply, (b) Operation, modify the 4th sentence in the paragraph as follows:

Depending on rainfall frequency and volume, a ~~minimum of one-third (approximately 3.3 AFY)~~ portion of the Project's total annual irrigation demand ~~(approximately 10 AFY) is expected to~~ would be provided by the Project's ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system.

36. Page V-70, Subsection b), Alternative 2: At Grade Parking Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (iii) Solid Waste, (a) Construction, modify the 2nd and 3rd sentences in the paragraph as follows:

With the demolition of existing uses slated for removal, the Project would generate an estimated ~~397,493~~ 317,994 (pre-diversion) and ~~99,373~~ 79,499 net tons of C&D waste. Of this total, ~~375,000~~ 295,500 tons is exported soil (~~250,000~~ 197,000 cubic yards). Since Alternative 2 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to 123,223 cubic yards, it would reduce the tonnage of exported soils from ~~375,000~~ 295,500 to 184,835, or a reduction of ~~190,165~~ 110,665 tons.

37. Page V-71, Subsection b), Alternative 2: At Grade Parking Alternative, (3), Relationship with the Project Objectives, modify the 3rd sentences in the 1st paragraph as follows:

Alternative 2 would also eliminate the Project's ~~one-million~~ approximately 350,000-gallon capture and reuse stormwater system.

38. Page V-72, Subsection b), Alternative 2: At Grade Parking Alternative, (3), Relationship with the Project Objectives, modify the 1st sentence of the 4th paragraph as follows:

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~~ 95 feet.

39. Page V-72, Subsection b), Alternative 2: At Grade Parking Alternative, (3), Relationship with the Project Objectives, modify the 6th paragraph as follows:

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~~ portion of the Project's total annual irrigation water demand. As a result, Alternative 2 would only be partially consistent with the following Project Objective:

40. Page V-73, Subsection b), Alternative 2: At Grade Parking Alternative, (3), Relationship with the Project Objectives, modify Objective 8 as follows:

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.

41. Page V-73, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (1) Description of Project Alternative, modify the 3rd sentence of the 1st paragraph in the subsection as follows:

Alternative 3 would also eliminate the Project's ~~503~~ 386-space subterranean parking garage and the ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system.

42. Page V-73, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (1) Description of Project Alternative, modify the 2nd to last sentence of the 2nd paragraph in the subsection as follows:

A total of 433 vehicle parking spaces would be provided under this layout, compared to ~~503~~ 403 spaces under the Project.

43. Page V-75, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (1) Description of Project Alternative, modify the 1st sentence of the 1st paragraph on the page as follows:

By eliminating the tennis courts, the number of light poles above the 30-foot conforming height limit would be reduced to ~~20~~ 12 (a reduction of ~~12~~ 10).

44. Page V-75, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (1) Description of Project Alternative, modify the 2nd to last sentence of the 2nd paragraph on the page as follows:

Public access to the Project Site would still be available, however, public ~~trails~~ pathways 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.

45. Page V-75, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (1) Description of Alternative, modify the 3rd paragraph as follows:

Under Alternative 3, no excavation for subterranean parking or underground stormwater capture and reuse system would be needed, as compared to ~~148,000~~ 197,000 cy of soil export (~~10,571~~ 14,071 trucks or ~~21,142~~ 28,142 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~~ 197,000 cy to 90,100 cy (6,436 trucks or 12,872 truck trips), which is a reduction of ~~159,900~~ 106,900 cy ~~(148,000 cy + 11,900 cy)~~ or ~~11,421~~ 7,635 trucks or ~~22,842~~ 15,270 truck trips. Total construction time of Alternative 3 would be approximately 19 months, or 11 months shorter than the 30 months under the Project.

46. Page V-76, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (a) Aesthetics/Visual Resources, (i) Light and Glare, (b) Operation, modify the 2nd sentence in the paragraph as follows:

By eliminating the tennis courts, the number of light poles above the 30-foot conforming height limit would be reduced to ~~20~~ 12, a reduction of ~~12~~ 10 compared to the Project.

47. Page V-76, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (b) Air Quality, (i) Consistency with Air Quality Management Plan, (a) Construction, modify the 1st sentence in the paragraph as follows:

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 offroad 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.

48. Page V-81, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (c) Biological Resources, (i) Candidate, Sensitive, or Special Status Species, modify the 3rd to last sentence on the page as follows:

Mitigation Measure BIO-MM-3 would be implemented to demonstrate compliance with regulatory requirements for nesting bird protection, and Project Design Feature ~~PDF-~~BIO-PDF-1 would be implemented to reduce any direct impacts to nesting birds and roosting bat species.

49. Page V-82, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (c) Biological Resources, (iv) Conflict with Policies or Ordinances Protecting Biological Resources, modify the paragraph as follows:

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. However, ~~A~~lternative 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~~ and 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 similar and 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.~~

50. Page V-84, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (e) Energy, (i) Construction, modify the 2nd sentence in the paragraph as follows:

One aspect of the construction phase, the export of excavated materials, is expected to require ~~35,714~~ 28,142 truck trips to haul ~~250,00~~ 197,000 cubic yards of materials under the Project, and 12,872 truck trips to haul 90,100 cubic yards of materials under Alternative 3.

51. Page V-85, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (e) Energy, (ii) Operation, modify the 2nd through 4th sentences in the paragraph as follows:

The Project's annual average operational electricity usage would be approximately ~~2,617,043~~ 2,675,043 kWh. Natural gas would be approximately 1,663,510 cubic feet. Transportation would result in an annual demand of ~~131,955~~ 132,955 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~~ 10 sports light fixtures associated with the tennis courts, as well as reduce the evening operating hours at the Project Site.

52. Page V-86, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (f) Geology and Soils, (ii) Soil Erosion and Loss of Topsoil, modify the 2nd sentence of the paragraph as follows:

By eliminating the Project's subterranean parking garage and ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system, Alternative 3 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to 90,100 cubic yards, which is a reduction of ~~159,900~~ 106,900 cubic yards.

53. Page V-87, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (g) Greenhouse Gas Emissions, (i) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

The Project would result in a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted), which would require a total of ~~17,857~~ 14,071 trucks or ~~35,714~~ 28,142 soil haul truck trips (to and from the Project Site). Alternative 3 would reduce the Project's

soil export of ~~250,000~~ 197,000 cubic yards to 90,100 cubic yards requiring 6,436 trucks or 12,872 truck trips, which is a reduction of ~~159,900~~ 106,900 cubic yards ~~(148,000 cubic yards + 11,900 cubic yards)~~ or ~~11,421~~ 7,635 trucks or ~~22,842~~ 15,270 truck trips.

54. Page V-89, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (h) Hazards and Hazardous Materials, (ii) Accidental Release of Hazardous Materials, modify the 2nd sentence of the 2nd paragraph in the subsection as follows:

The Project would result in ~~a rough cut/fill volume of 251,836 cubic yards and~~ the export of ~~250,000~~ 197,000 cubic yards of material; whereas Alternative 3 would result in the export of 90,100 cubic yards of material.

55. Pages V-91 and V-92, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (i) Water Quality Standards and Groundwater Quality, (b) Operation, modify the paragraph on pages V-91 and V-92 as follows:

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~~ approximately 350,000-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 and similar. ~~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.~~

56. Page V-92, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (ii) Changes in Groundwater Supplies or Recharge, (b) Operation, modify the paragraph as follows:

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~~ approximately 350,000-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~~ approximately 350,000-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.

57. Pages V-93 and V-94, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows, (b) Operation, modify the two paragraphs as follows:

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 and similar. ~~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.~~

58. Page V-99, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (b) Operation, modify the 1st and 2nd sentences of the 2nd paragraph as follows:

In addition, the Project and Alternative 3 would provide public access to landscaped walking ~~trails~~ pathways, 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, publicly-accessible pathways ~~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.

59. Page V-101, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (m) Transportation, (iv) Emergency Access, (a) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

Alternative 3 would export 90,100 cubic yards of excavated materials, which would generate ~~13,472~~ 12,872 truck trips. The Project would export ~~250,000~~ 197,000 cubic yards of excavated materials, which would generate ~~35,714~~ 28,142 haul truck trips.

60. Page V-104, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (i) Water Supply, (b) Operation, modify the 1st two full sentences on the page as follows:

Depending on rainfall frequency and volume, a ~~minimum of one-third (approximately 3.3 AFY)~~ portion of the Project's total annual irrigation demand (approximately 10 AFY) is expected to be provided by the Project's ~~one-million~~ approximately 350,000-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.

61. Page V-105, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (iii) Solid Waste, (a) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

With the demolition of existing uses slated for removal, the Project would generate an estimated ~~397,493~~ 317,994 tons (pre-diversion) and ~~99,373~~ 79,499 net tons of C&D waste. Of this total, ~~375,000~~ 295,500 tons is exported soil (~~250,000~~ 197,000 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~~ 295,500 to 135,100, or a reduction of ~~239,850~~ 160,400 tons.

62. Page V-107, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (3) Relationship of the Alternative with the Project Objectives, modify the 1st full sentence of the partial paragraph as follows:

Also, under Alternative 3, public ~~trails~~ pathways 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.

63. Page V-107, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (3) Relationship of the Alternative with the Project Objectives, modify the 5th full paragraph as follows:

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:

64. Page V-107, Subsection c), Alternative 3: Reduced Density and Programming Alternative, (3) Relationship of the Alternative with the Project Objectives, modify Objective 8 as follows:

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.

65. Page V-108, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (1) Description of the Alternative, modify the 1st two sentences of the 3rd paragraph as follows:

The Project's ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system would not be developed under Alternative 4. The ~~503~~ 386-space subterranean

parking garage, ~~29~~17-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.

66. Page V-109, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (1) Description of the Alternative, modify the 1st sentence of the 2nd paragraph as follows:

With elimination of the Project's ~~one-million~~ approximately 350,000-gallon underground stormwater capture and reuse system under Alternative 4, the Project's total soil export of ~~250,000~~ 197,000 cubic yards would be reduced by 11,900 cubic yards (850 or 1,700 truck trips) to ~~238,100~~ 185,100 cubic yards (~~17,007~~ 13,221 trucks or ~~34,014~~ 26,442 truck trips).

67. Page V-110, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (b) Air Quality, (i) Consistency with Air Quality Management Plan, (a) Construction, modify the 3rd and 4th sentences as follows:

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.

68. Pages V-115, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (c) Biological Resources, (iii) Movement of Wildlife or Nursery Sites , modify the 2nd to last sentence of the paragraph as follows:

Project Design Feature ~~PDF-~~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.

69. Pages V-115 and V-116, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (c) Biological Resources, (iv) Conflict with Policies or Ordinances Protecting Biological Resources, modify the 5th sentence to the end of the paragraph as follows:

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. However, 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~~ and 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 similar and 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.~~

70. Page V-117, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (d) Cultural Resources, (ii) Archaeological Resources, modify the last sentence of the paragraph as follows:

However, because Alternative 4 would reduce the extent of excavation activity due to elimination of the ~~one-million~~ approximately 350,000-gallon underground stormwater capture and reuse system, impacts to archaeological resources would be less under Alternative 4 than under the Project.

71. Page V-117, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (d) Cultural Resources, (iii) Human Remains, modify the last sentence of the paragraph as follows:

However, because Alternative 4 would reduce the extent of excavation activities compared to the Project due to the elimination of the ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system, impacts related to human remains would be less under Alternative 4 than under the Project.

72. Page V-118, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (e) Energy, (i) Construction, modify the 1st through 3rd sentences in the partial paragraph as follows:

One aspect of the construction phase, the export of excavated materials, is expected to require ~~35,714~~ 28,142 truck trips to haul ~~250,00~~ 197,000 cubic yards of materials under the Project. This would be reduced under Alternative 4 to ~~34,014~~ 26,442 truck trips to haul ~~238,100~~ 185,100 cubic yards. Because Alternative 4 would shorten construction duration and hauling activity due to elimination of the ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system, it would reduce the Project's overall demand for electricity and fuel.

73. Page V-118, Subsection d), Alternative: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (e) Energy, (ii) Operation, modify the 2nd sentence in the paragraph as follows:

The Project's annual average operational electricity usage would be approximately ~~2,617,043~~ 2,675,043 kWh. Natural gas would be approximately 1,663,510 cubic feet. Transportation would result in an annual demand of ~~131,955~~ 132,955 gallons of gasoline and 14,756 gallons of diesel.

74. Page V-119, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (f) Geology and Soils, (ii) Soil Erosion and Loss of Topsoil, modify the 2nd sentence of the paragraph as follows:

By eliminating the Project's ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system, Alternative 4 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to ~~238,100~~ 185,100 cubic yards, which is a reduction of 11,900 cubic yards.

75. Page V-120, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (f) Geology and Soils, (v) Paleontological Resources, modify the 2nd sentence of the paragraph as follows:

Alternative 4 would eliminate the Project's ~~one-million~~ approximately 350,000-gallon underground stormwater capture and reuse system.

76. Page V-120, Subsection 6(d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (g) Greenhouse Gas Emissions, (i) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

The Project would result in a net cut/fill volume of approximately ~~250,000~~ 197,000 cubic yards (unadjusted), which would require a total of ~~17,857~~ 14,071 trucks or ~~35,714~~ 28,142 soil haul truck trips (to and from the Project Site). Alternative 4 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to ~~238,100~~ 185,100 cubic yards, requiring ~~17,007~~ 13,221 trucks or ~~34,014~~ 26,442 truck trips, which is a reduction of 11,900 cubic yards (850 trucks or 1,700 truck trips).

77. Page V-122, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (h) Hazards and Hazardous Materials, (ii) Accidental Release of Hazardous Materials, modify the 2nd sentence of the 2nd paragraph in the subsection as follows:

The Project would result in ~~a rough cut/fill volume of 251,836 cubic yards and~~ the export of ~~250,000~~ 197,000 cubic yards of material; whereas Alternative 4 would result in the export of ~~238,000~~ 185,100 cubic yards of material.

78. Pages V-124 and V-125, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (i)

Water Quality Standards and Groundwater Quality, (b) Operation, modify the paragraph on pages V-124 and V-125 as follows:

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~~ approximately 350,000-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 and similar. ~~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.~~

79. Page V-125 and V-126, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (ii) Changes in Groundwater Supplies or Recharge, (b) Operation, modify the paragraph as follows:

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~~ approximately 350,000-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~~

approximately 350,000-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.

80. Pages V-126 and V-127, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (i) Hydrology and Water Quality, (iii) Alteration of Drainage Pattern Resulting in Erosion, Siltation, Exceedance of Stormwater Drainage System Capacity, or Impeded Flood Flows, (b) Operation, modify the two paragraphs as follows:

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 and similar. ~~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.~~

81. Page V-132, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (a) Construction, modify the paragraph as follows:

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 similar and 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.~~

82. Page V-133, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (l) Public Services, (iii) Parks and Recreation, (b) Operation, modify the 1st sentence of the 1st full paragraph as follows:

In addition, Alternative 4 would not provide public access to any of the Project Site's other recreational facilities or landscaped walking ~~trails~~ pathways, 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.

83. Page V-133, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (m) Transportation, (i) Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities, modify the 1st sentence of the paragraph as follows:

The Project, as evaluated in Section ~~IV.L.3, *Parks and Recreation*~~ *IV.M, Transportation*, 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.

84. Page V-135, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (m) Transportation, (iv) Emergency Access, (a) Construction, modify the 1st three sentences of the paragraph as follows:

The Project, as evaluated in Section ~~IV.L.3, *Parks and Recreation,*~~ *IV.M, Transportation*, 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~~ 185,100 cubic yards of excavated materials, which would generate ~~34,014~~ 26,442 truck trips. The Project would export ~~250,000~~ 197,000 cubic yards of excavated materials, which would generate ~~35,714~~ 28,142 haul truck trips.

85. Page V-135, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (m) Transportation, (iv) Emergency Access, (b) Operation, modify the 1st sentence of the paragraph as follows:

The Project Site, as described in Section ~~IV.L.3, Parks and Recreation~~ *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.

86. Page V-137, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (i) Water Supply, (b) Operation, modify the 7th sentence in the paragraph as follows:

Depending on rainfall frequency and volume, a ~~minimum of one-third (approximately 3.3 AFY)~~ portion of the Project's total annual irrigation demand (approximately 10 AFY) is expected to be provided by the Project's ~~one-million~~ approximately 350,000-gallon stormwater capture and reuse system.

87. Page V-138, Subsection d), Alternative 4: No Public Use/No Public Events Alternative, (2) Environmental Impacts, (o) Utilities and Service Systems – Water Supply, Wastewater, and Solid Waste, (iii) Solid Waste, (a) Construction, modify the 2nd and 3rd sentences of the paragraph as follows:

With the demolition of existing uses slated for removal, the Project would generate an estimated ~~397,493~~ 317,994 tons (pre-diversion) and ~~99,373~~ 79,499 net tons of C&D waste. Of this total, ~~375,000~~ 295,500 tons is exported soil (~~250,000~~ 197,000 cubic yards). Since Alternative 4 would reduce the Project's soil export of ~~250,000~~ 197,000 cubic yards to ~~238,100~~ 185,100 cubic yards, it would reduce the tonnage of exported soils from ~~375,000~~ 295,500 to ~~357,150~~ 277,650, or a reduction of 17,850 tons.

88. Page V-140, Subsection (3), Relationship of the Alternative with the Project Objectives, modify Objective 8 as follows:

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.

89. Page V-146, Table V-2, *Comparison of Impacts Associated with the Alternatives and the Project*, modify the rows shown below within the table:

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~~ Similar (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~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)
Water Quality Standards and Groundwater Quality					
Operation	Less than Significant	Greater (Less than Significant)	~~Greater~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)
Alteration of Drainage Patterns					
Operation	Less than Significant	Greater (Less than Significant)	~~Greater~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)	~~Greater~~ Similar (Less than Significant)
Parks and Recreation					
Construction	Less than Significant	Greater (Less than Significant)	Similar (Less than Significant)	Greater (Less than Significant)	~~Greater~~ Similar (Less than Significant)

90. Page V-154, Subsection 7, Environmentally Superior Alternative, modify the 1st paragraph as follows:

On the other hand, Alternative 2 would result in ~~six~~ three 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~~ approximately 350,000-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.

91. Page V-154, Subsection 7, Environmentally Superior Alternative, modify the 3rd paragraph as follows:

Alternative 3 would result in ~~seven~~ three 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~~ approximately 350,000-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.

92. Page V-155, Subsection 7, Environmentally Superior Alternative, modify the 1st sentence of the 1st paragraph as follows:

Alternative 4 would result in a similar scale of development as the Project, with the exception of the elimination of the ~~one-million~~ approximately 350,000-gallon underground stormwater capture and reuse system.

93. Page V-155, Subsection 7, Environmentally Superior Alternative, modify the 2nd paragraph as follows:

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~~ four 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~~ approximately 350,000-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

20. Chapter VI. Other CEQA Considerations

1. Pages VI-5 and VI-6, Subsection 2. Reasons Why the Project is Being Proposed, Notwithstanding Significant Unavoidable Impacts, modify the paragraph on pages VI-5 and VI-6 as follows:

In addition to identification of the Project's significant unavoidable construction noise [on-site construction noise (Project-level); on-site construction equipment noise (Cumulative); and off-site construction noise (Cumulative)] impacts, Section 15126.2(c) of the State *CEQA Guidelines* also requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project. As described further below, this Project is being proposed, notwithstanding its significant unavoidable impact, because: (1) the Project would convert a former private golf and tennis club to provide access to landscaped open space, ~~trails~~ pedestrian paths, and recreational opportunities to the public and the School in an area with a shortage of

neighborhood parks; (2) the Project's significant unavoidable impacts caused by construction noise would be temporary; (3) the Project would improve public access to the Zev Greenway through the Project Site; (4) the Project would support the RIO District Ordinance and help restore the Project Site with native trees and shrubs; (5) the Project would install a ~~1-million~~ approximately 350,000-gallon stormwater capture and reuse system that would help conserve the City's potable water supply and improve water quality received by the Los Angeles River from the Project Site~~ and a 39-acre, off-site drainage area consisting of single- and multi-family residential uses to the north of the Project Site~~; and (6) to help meet the School's needs in providing recreational and academic opportunities to its students.

2. Page VI-8, Subsection 3. Significant Irreversible Environmental Changes, modify the 6th sentence of the 3rd full paragraph in this subsection as follows:

The Project, even with an extensive landscaping program that would result in the net increase of 153 trees beyond existing conditions, would save water by planting drought tolerant landscaping and reusing captured on-site stormwater ~~from on-site and off-site watersheds~~.

3. Page VI-9, Subsection 4. Growth-Inducting Impacts, modify the 3rd sentence of the 2nd paragraph in this subsection as follows:

The Project would provide approximately 5.4 acres (235,224 square feet) of publicly accessible open space and landscaped ~~trails~~ pathways connecting via a ramp to the adjacent Zev Greenway and to on-site landscaped areas~~, water features,~~ and recreational facilities.

21. Appendix J. Land Use Plans and Policies: Project Consistency Tables

1. Page J-1, Table LU-1, *Consistency of the Project with Applicable Strategies of the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigate an Environmental Effect*, regarding land use patterns that facilitate multimodal access, column 2, modify the 1st sentence as follows:

The Project would promote bicycle and pedestrian activity through the provision of landscaped pedestrian ~~trails~~ pathways, bicycle parking, ~~trail~~ ramp access to the Zev Greenway (a section of the Los Angeles River Greenway), and installation of an Americans with Disabilities Act (ADA)-compliant off-site pedestrian access ramp to the Zev Greenway at Coldwater Canyon Avenue, thus, providing direct pedestrian access to the Zev Greenway where there currently is none.

2. Page J-2, Table LU-1, *Consistency of the Project with Applicable Strategies of the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigate an Environmental Effect*, regarding supporting

development of local climate adaptation and hazard mitigation plans, column 2, modify the 4th sentence as follows:

Stormwater would be collected ~~from Whitsett Avenue, upstream from the Project Site, as well as from~~ throughout the Project Site and roofs.

3. Page J-4, Table LU-1, *Consistency of the Project with Applicable Strategies of the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Intended to Avoid or Mitigate an Environmental Effect*, regarding ways to improve access to public park space, column 2, modify the 3rd sentence as follows:

It would also provide 5.4 acres of landscaped open space and ~~trails~~ pathways for public use, with gateway access at eight locations around the Project Site, and ongoing access to and use of the Project's recreational and athletic facilities when not in use by the School.

4. Page J-5, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Policy 3.2.3, column 2, modify the 2nd sentence as follows:

In addition, by providing several access gateways to publicly accessible landscaped ~~trails~~ pathways within the Project Site, the Project is designed to promote pedestrian access.

5. Page J-6, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Objective 3.2.4, column 2, modify 2nd and 3rd sentences as follows:

Uses would include 5.4 acres of landscaped open space and ~~trails~~ pathways, two athletic fields, swimming pools, tennis courts, and gymnasium. The gymnasium ~~and pool canopies~~ would not exceed 30 feet in height~~,~~ and ~~the gymnasium~~ has been specifically located on the Project Site at a point farthest away from nearby residences (approximately 400 feet to the north and 450 feet to the east). The pool canopy would not exceed 14.5 feet in height.

6. Page J-8, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Policy 6.1.2, column 2, modify the 1st and 2nd sentences as follows:

The Project would collect, filter, and store surface water runoff~~, including stormwater, from Whitsett Avenue upstream from the Project Site and~~ from t~~hroughout~~ the Project Site, including building roofs. Storage capacity would be up to ~~one million~~ approximately 350,000 gallons~~, plus several thousand additional gallons that would circulate in the Project's multiple water feature bio-habitats~~.

7. Page J-9, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Policy 6.3, column 2, modify text as follows:

Under the Project, stormwater runoff that can cause erosion or degradation of the Los Angeles River would be collected ~~from Whitsett Avenue, upstream from the Project Site and~~ from within the Project Site. Captured stormwater would be treated and reused. Reclaimed water would be stored in underground cisterns with a total capacity of ~~one million~~ approximately 350,000 gallons. The reclaimed water would be used for irrigation within the publicly accessible 5.4 acres (235,224 square feet) of walking paths and wooded areas~~, as well as for the Project's bio-habitat water features~~. If capacity in the underground cisterns were reached, stormwater flowing from ~~the residential neighborhood to the north of~~ within the Project Site would continue to be collected and treated before being discharged back onto Whitsett Avenue where it would flow into the Los Angeles River~~.~~ The implementation of this system would upgrade the volume and quality of flow to the Los Angeles River. As such, it would minimize environmental risks to the public related to ~~flooding and~~ degraded water quality. Therefore, the Project would not conflict with policies to ensure that open space is managed to minimize environmental risks to the public.

8. Page J-10, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Goal 9B, column 2, modify text as follows:

The Project would contribute to the City's stormwater management system by capturing surface water runoff ~~at Whitsett Avenue, upstream from the Project Site, as well as~~ throughout the approximately 17.2-acre Project Site. The water would be stored and filtered for reuse on-site and to provide controlled delivery to the Los Angeles River during a large storm event. The management of currently uncontrolled surface flow from the ~~collection location on Whitsett Avenue~~ Project Site would ~~reduce potential flooding, reduce vehicular safety hazards in that same area, and~~ improve water quality flowing into the Los Angeles River (please refer to Section IV.I, Hydrology and Water Quality, of this Draft EIR). Therefore, the Project would not conflict with policies regarding stormwater management that minimizes flood hazards and protects water quality by employing watershed-based approaches that balance environmental, economic and engineering considerations.

9. Page J-10, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Objective 9.5, column 2, modify text as follows:

The Project's stormwater collection system would comply with all applicable City requirements pertaining to flood control and drainage from the Project Site. As such, the Project Site and surrounding properties would not be subject to flood hazards from the Project Site~~ reduce flood hazard in the area between Valley Spring Lane and the Los Angeles River, as well as maintenance requirements related to the existing stormwater drainage system in the area~~. Therefore, the Project would not conflict with policies to

ensure that all properties are protected from flood hazards in accordance with applicable standards and that existing drainage systems are adequately maintained.

10. Page J-11, Table LU-2, *Consistency of the Project with Applicable Goals, Objectives and Policies of the General Plan Framework Element Intended to Avoid or Mitigate Environmental Effects*, regarding Objective 9.6, column 2, modify text as follows:

Under the Project, stormwater runoff that can cause erosion or degradation of the Los Angeles River would be collected ~~along Whitsett Avenue, upstream from the Project Site and~~ from within the Project Site. Captured stormwater would be treated and reused. Reclaimed water would be stored in underground cisterns with a total capacity of ~~one million~~ approximately 350,000 gallons. The reclaimed water would be used for irrigation within the publicly accessible 5.4 acres (235,224 square feet) of walking ~~trails~~ paths and wooded areas~~, as well as for the Project's bio-habitat water features~~. If capacity in the underground cisterns were reached, stormwater flowing from within the Project Site ~~residential neighborhood to the north of the Project Site~~ would continue to be collected and treated before being discharged back onto Whitsett Avenue where it would flow into the Los Angeles River. The implementation of this system would help regulate the volume of flow to the Los Angeles River, improve water quality, and minimize environmental risks to the public. Therefore, the Project would not conflict with policies to pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.

11. Page J-12. Table LU-3, *Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding the policy to conserve unique natural features, scenic areas, cultural and appropriate historical monuments for the benefit and enjoyment of the public, column 2, modify the 1st sentence as follows:

The Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the Historic-Cultural Monument, Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically ~~PDF-~~CUL-PDF-1, Rehabilitation Plan, ~~PDF-~~CUL-PDF-2, Documentation, and ~~PDF-~~CUL-PDF-3, Interpretation.

12. Page J-13. Table LU-3, *Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding the policy to conserve and/or preserve open space areas containing the City's environmental resources including air and water, column 2, modify the 1st full sentence as follows:

In addition, the Project's stormwater collection system would collect, filter and store stormwater runoff from ~~Whitsett Avenue and~~ on-site sheet flow that would, otherwise, flow into the Los Angeles River.

13. Page J-13, Table LU-3, *Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding the policy to provide access, where appropriate, to open space land, column 2, modify text as follows:

The Project would not conflict with policies to provide access, where appropriate, to open space lands. The Project's open space system would provide ~~trails~~ pathways that would tie into the Zev Greenway, a segment of the Los Angeles Greenway, and provide off-site connectivity between Coldwater Canyon Avenue and the Zev Greenway via a new ADA-compliant pedestrian ramp.

14. Page J-13, Table LU-3, *Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding the policy to identify unique natural features, scenic areas and historical sites that are desirable for preservation, column 2, modify the 3rd sentence as follows:

The Project would retain its significance as a 1950s community recreational facility, all of the identified character-defining features of the Historic-Cultural Monument, Studio City Golf and Tennis Club, and it includes Project Design Features to ensure the significance of the HCM is retained, specifically ~~PDF-~~CUL-PDF-1, Rehabilitation Plan, ~~PDF-~~CUL-PDF-2, Documentation, and ~~PDF-~~CUL-PDF-3, Interpretation.

15. Page J-14, Table LU-3, *Consistency of the Project with Applicable Goals, Objectives and Policies of the Open Space Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding the policy to provide zoning regulations and standards that emphasize natural and topographic values and constraints, column 2, modify the 2nd sentence as follows:

The Project's stormwater collection system would collect, filter, and store stormwater runoff ~~from Whitsett Avenue~~ and sheetflow from within the Project Site.

16. Page J-15, Table LU-4, *Consistency of the Project with Applicable Goals, Objectives and Policies of Conservation Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding Section 8, Erosion Objective, column 2, modify the 2nd sentence as follows:

During operation, the Project's stormwater collection system would collect, filter, and store stormwater runoff from ~~Whitsett Avenue and~~ on-site sheet flow that would, otherwise, flow untreated into the Los Angeles River.

17. Pages J-16 and J-17, Table LU-4, *Consistency of the Project with Applicable Goals, Objectives and Policies of Conservation Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding Section 12, Habitats, Policy 2, column 2, remove the last sentence on page J-16 that continues

onto page J-17, and delete the incomplete sentence at the end of the paragraph as follows:

Other landscaping plantings, numbering in the tens of thousands, would also comprise native species and improve and expand upon existing, limited foraging and wildlife habitat along the Zev Greenway. ~~The inclusion of circulating water bio habitats would provide an opportunity for animal species along the Los Angeles River Greenway, such as bird species, to find further foraging and shelter areas.~~ The increase of overall landscaping along the riverfront and native species would protect, restore, or enhance habitat areas and linkages. Therefore, the Project would not conflict with policies that continue to protect, restore and/or enhance habitat areas, linkages and corridor segments, to the greatest extent practical, within city owned or managed sites. ~~The Project would implement~~

18. Page J-17, Table LU-4, *Consistency of the Project with Applicable Goals, Objectives and Policies of Conservation Element of the General Plan Intended to Avoid or Mitigate Environmental Effects*, regarding Section 15, Land Form and Scenic Vistas, Policy, regarding the policy to encourage property owners to maintain existing land forms, column 2, modify the 3rd sentence as follows:

Because the Project would provide 5.4 acres of open space and primarily open fields, with a height-conforming two-story gymnasium building and ~~height-conforming~~ a 14.5-foot-tall pool canopy for sound attenuation, it would not affect existing views of the mountains located south of the Project Site.

19. Page J-19, Table LU-5, *Consistency of the Project with Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Mitigate Environmental Effects*, regarding lack of public funding to convert he site to a public park, column 2, modify the 1st sentence as follows:

The entire Project Site would be open to the public, with landscaped ~~trails~~ pathways (open space) and multiple forms of recreation that could be used when not otherwise occupied by the School and would relieve the demand for public funding for such open space uses on the Project Site.

20. Page J-19, Table LU-5, *Consistency of the Project with Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Mitigate Environmental Effects*, regarding Objective 4.1, column 2, modify the 2nd sentence as follows:

The provision of landscaped ~~trails~~ pathways to the public, the use of numerous recreational facilities and community room, and ~~pathway~~ access to Zev Greenway, would maintain the recreational purpose of the Project Site and promote the public's outdoor and recreational experience.

21. Page J-22, Table LU-5, *Consistency of the Project with Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Mitigate Environmental Effects*, regarding Action 8, column 2, modify the 2nd sentence as follows:

It would provide 5.4 acres of publicly-accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway and to on-site landscaped areas~~, water features,~~ and recreational facilities.

22. Page J-22, Table LU-5, *Consistency of the Project with Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Mitigate Environmental Effects*, regarding Action 9, column 2, modify the 2nd and 3rd sentences as follows:

The Project would expand the community's public park and recreational uses through its 5.4 acres of public open space, including ~~water features,~~ benches, wooded areas and natural spaces open and available to the public from 7:00 a.m. to 9:00 p.m., seven days a week. Landscaped, publicly accessible ~~trails~~ pathways, which would circumnavigate the Project Site for a distance of approximately 0.75 mile, would allow dog walking, recreation, relaxation, and observation of the natural setting and biodiversity around the Project Site.

23. Page J-23, Table LU-6, *Consistency of the Project with Policies of the Policies of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan Intended to Mitigate Environmental Effects*, regarding Public Open Space, column 2, ~~bullet~~ no. 1, modify the 2nd sentence as follows:

Eight pedestrian access gates would be included around the Project Site for all-day pedestrian access to the Project's 5.4 acres of open space and 0.75 mile of landscaped ~~trails~~ pathways.

24. Page J-24, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 1 regarding support of the goals of the River Revitalization Master Plan, column 2, modify the 1st sentence as follows:

By providing a park and open space use, pedestrian ~~trails~~ pathways, community use of recreational and athletic facilities when not in use by the School, and a ~~landscaped trail link~~ pedestrian ramp to the Zev Greenway, the Project would support the goals of the Los Angeles River Revitalization Plan (LARRMP) to develop parks and open space, and to provide pedestrian ~~trails~~ pathways.

25. Page J-24, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 2 regarding environmental and ecological health, column 2, modify the 1st and 2nd sentences as follows:

The Project would reduce the volume of surface water runoff during storm events and improve the quality of surface water runoff into the Los Angeles River through the design and construction of a storm water collection and treatment system to collect rainwater and other urban runoff ~~at the corner of Whitsett Avenue and Valley Spring Lane, as well as~~ throughout the Project Site, including the Project's building roofs. The capacity of the system would be ~~one million~~ approximately 350,000 gallons of water.

26. Page J-24, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 3 regarding a positive interface between the river and adjacent property, column 2, modify the 1st sentence as follows:

In contrast to current conditions that offer no linkage or interface with the Zev Greenway and no publicly accessible park space, the Project would provide approximately 5.4 acres of publicly accessible open space and landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway and to on-site landscaped areas~~, water features,~~ and recreational facilities in proximity to the Los Angeles River.

27. Page J-25, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 4 regarding pedestrian, bicycle and other multi-modal connection between the river and its surrounding neighborhoods, column 2, modify the 2nd sentence as follows:

In addition, the Project Site would provide pedestrian access and bicycle parking and improve pedestrian access to the Zev Greenway through the installation of an ADA-compliant off-site pedestrian ramp at Coldwater Canyon Avenue, which would further connect pedestrian pathways ~~trails~~ from the Project's open space and the Los Angeles River.

28. Page J-25, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 5 regarding native habitat, column 2, modify the 2nd sentence as follows:

Native plant species would be provided as landscaping along the pedestrian ~~trails~~ pathways, Project Site interior, and along the Zev Greenway.

29. Page J-25, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 6 regarding aesthetically pleasing environment, column 2, modify the 1st sentence as follows:

The Project would provide 5.4 acres of publicly accessible landscaped ~~trails~~ pathways connecting to the adjacent Zev Greenway. Landscaping would include shrubs, trees ~~water features~~, and seating for pedestrians within a natural setting.

30. Page J-25, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 7 regarding access to the river, column 2, modify the 1st sentence as follows:

The Project would provide over 0.75 mile of pathways connecting to the adjacent Zev Greenway, a public ~~pathway~~ trail following the north edge of the Los Angeles River.

31. Page J-26, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Policy 9 regarding the Low Impact Development Ordinance, column 2, modify the 1st three sentences as follows:

The Project would provide an ~~off-site (within the Whitsett Avenue and Valley Spring Lane intersection) and~~ on-site stormwater runoff collection system that would exceed the City's LID Ordinance by reducing the rate of stormwater runoff. The Project would capture and treat surface water runoff from ~~the Whitsett Avenue/Valley Spring Lane intersection and throughou~~t the Project Site. Runoff would be stored in a ~~one million~~ approximately 350,000-gallon underground tank and filtered prior to use as on-site irrigation or released into the in-street storm system (during periods of heavy rainfall when onsite stored capacity has been reached).

32. Page J-29, Table LU-6, *Consistency of the Project with Policies of the River Improvement Overlay District Ordinance Intended to Mitigate Environmental Effects*, Section 13.17 F.4, item (f) regarding river access, column 2, modify the text as follows:

The Project would include a landscaped pathway between its public open space ~~trails~~ and the Zev Greenway. In addition, the Project would provide for an offsite, ADA-compliant pedestrian ramp for the Zev Greenway at Coldwater Canyon Avenue for improved public access to the river. All public access to the Los Angeles River (via the Zev Greenway) would be ADA-compliant. The gates would also be accessible for bicycle entry to bicycle parking areas. However, because ~~trails~~ pathways are for pedestrian use, bicycles would not be ridden throughout the Project Site.

22. Appendix I, Hydrology and Water Quality Report

1. Page 4, Table 1, Existing Drainage Stormwater Runoff Calculations During 85th Percentile and 50-year Storm Event, contains an error in the summation of the generated discharge in fourth column of Table 1 which should read 2.21 cfs instead of 1.4 cfs for the 85th percentile storm event. The summation row of Table is revised as follows:

Total	17.2	30%	~~1.4~~ 2.21	54.9

23. Appendix M, Transportation Assessment

1. Page 24 of TA (PDF Page 42 of 217 of Appendix M), add Figure M-1 and modify the 1st full paragraph as follows:

Weddington Golf & Tennis consists of the patrons of the existing golf and tennis facility. The average trip length (5.9 miles) was estimated as a weighted average trip length based on a trip distribution by zip code and the trip length from each zip code to the Project Site. The trip distribution by zip code was developed using zip code data provided by Weddington Golf & Tennis of the number of tennis players in each zip code based on a survey conducted over the course of a week in September 2019. **Figure M-1**, *Tennis Players Zip Code Survey,* lists the origin zip codes of tennis court users during the surveyed time period.

See Figure M-1 on following page(s).

2. Page 24 of TA (PDF Page 42 of 217 of Appendix M), add Figure M-2 and the following text after the 1st full paragraph:

Ingress and egress data for the existing Weddington Golf & Tennis driveways is provided in **Figure M-2**, *Existing Driveway Data*.

See Figure M-2 on following page(s).

3. Page 60 of TA (PDF Page 78 of 217 of Appendix M), add Figure M-3 and following the first paragraph after the "Los Angeles Fire Station 78" subheading add:

Figure M-3, *Fire Truck (NCHRP Report Aerial Fire Truck) Autoturn*, illustrates that adequate space is provided in the Project's roundabout to accommodate the full radii of turning fire trucks.

See Figure M-3 on following page(s).

4. Pages 73 and 74 of TA (PDF Pages 91 and 92 of 217 in Appendix M), in the Summary and Conclusions bullet list, delete the last bullet beginning on Page 73 (PDF Page 91) and ending on Page 74 (PDF Page 92) as follows:

~~The Project is expected to generate an increase in pedestrian volumes in the vicinity, which currently lacks tactile warnings at intersection curb ramps. It is recommended that tactile warnings and marked crosswalks be installed along at the intersections of Whitsett Avenue & Valley Spring Lane, Whitsett Avenue & Valleyheart Drive, Babcock Avenue & Valley Spring Lane, Beeman Avenue & Valley Spring Lane, and Teesdale Avenue & Valley Spring Lane as part of the Project improvements.~~

Figure M-1 - Tennis Players Zip Code Survey

Weddington Golf and Tennis
Tennis Player Zip Codes
Surveyed Week of September 16-22, 2

Zip Code	# of Tennis Players
91604	78
91423	49
91607	21
91602	18
90046	15
91403	14
91601	13
90068	12
91401	11
91405	11
90210	8
91411	7
90048	6
91316	6
91104	5
91356	5
90027	4
90069	4
90077	4
91001	4
91362	4
91406	4
91436	4
90028	3
91302	3
91342	3
91352	3
90026	2
90039	2
90065	2
90212	2
91214	2
91325	2
91364	2
91367	2
91377	2
91505	2
91506	2
91602	2
91606	2
90004	1
90012	1
90014	1
90017	1
90025	1
90031	1
90036	1
90049	1
90057	1
90064	1
90232	1
90291	1
90292	1
90401	1
91003	1
91011	1
91106	1
91108	1
91201	1
91205	1
91209	1
91210	1
91307	1
91311	1
91324	1
91326	1
91335	1
91387	1
91402	1
91413	1
91603	1
91606	1
91609	1
91801	1
93063	1
93065	1

Figure M-2 - Existing Driveway Data

Prepared by NDS/ATD

IN & OUT

4141 Whitsett Ave Weddington Golf & Tennis S/O Valley Spring Ln

Day: Tuesday
Date: 2/12/2019

City: Studio City
Project #: 19-5073-001

DAILY TOTALS	IN	OUT		Total
	496	2		498

AM Period	IN		OUT		TOTAL		PM Period	IN		OUT		TOTAL	
0:00	1		0		1		**12:00**	6		0		6	
0:15	0		0		0		**12:15**	4		0		4	
0:30	0		0		0		**12:30**	3		0		3	
0:45	0	1	0		0	1	**12:45**	12	25	0		12	25
1:00	0		0		0		**13:00**	11		0		11	
1:15	0		0		0		**13:15**	2		0		2	
1:30	0		0		0		**13:30**	3		0		3	
1:45	0		0		0		**13:45**	12	28	0		12	28
2:00	1		0		1		**14:00**	5		0		5	
2:15	0		0		0		**14:15**	6		0		6	
2:30	0		0		0		**14:30**	10		0		10	
2:45	0	1	0		0	1	**14:45**	26	47	0		26	47
3:00	0		0		0		**15:00**	11		0		11	
3:15	0		0		0		**15:15**	10		0		10	
3:30	0		0		0		**15:30**	10		0		10	
3:45	0		0		0		**15:45**	22	53	0		22	53
4:00	0		0		0		**16:00**	10		0		10	
4:15	0		0		0		**16:15**	10		0		10	
4:30	0		0		0		**16:30**	4		1		5	
4:45	0		0		0		**16:45**	9	33	0	1	9	34
5:00	0		0		0		**17:00**	12		0		12	
5:15	0		0		0		**17:15**	12		0		12	
5:30	0		0		0		**17:30**	12		0		12	
5:45	0		0		0		**17:45**	16	52	0		16	52
6:00	2		0		2		**18:00**	16		0		16	
6:15	1		0		1		**18:15**	3		0		3	
6:30	0		0		0		**18:30**	13		0		13	
6:45	2	5	0		2	5	**18:45**	16	48	0		16	48
7:00	0		0		0		**19:00**	9		0		9	
7:15	1		0		1		**19:15**	5		0		5	
7:30	3		0		3		**19:30**	5		0		5	
7:45	8	12	0		8	12	**19:45**	8	27	0		8	27
8:00	5		0		5		**20:00**	5		0		5	
8:15	4		0		4		**20:15**	8		0		8	
8:30	5		0		5		**20:30**	0		0		0	
8:45	20	34	0		20	34	**20:45**	3	16	0		3	16
9:00	8		0		8		**21:00**	2		0		2	
9:15	12		0		12		**21:15**	2		0		2	
9:30	6		0		6		**21:30**	4		0		4	
9:45	12	38	0		12	38	**21:45**	1	9	0		1	9
10:00	14		0		14		**22:00**	0		0		0	
10:15	11		0		11		**22:15**	0		0		0	
10:30	10		0		10		**22:30**	0		0		0	
10:45	12	47	0		12	47	**22:45**	1	1	0		1	1
11:00	6		0		6		**23:00**	0		0		0	
11:15	5		0		5		**23:15**	0		1		1	
11:30	5		0		5		**23:30**	0		0		0	
11:45	3	19	0		3	19	**23:45**	0		0	1	0	1
TOTALS		157				**157**	**TOTALS**		339		2		**341**
SPLIT %		100.0%				**31.5%**	**SPLIT %**		99.4%		0.6%		**68.5%**

DAILY TOTALS	IN	OUT		Total
	496	2		498

AM Peak Hour	9:45				**9:45**	**PM Peak Hour**	14:30	15:45			**14:30**
AM Pk Volume	47				**47**	**PM Pk Volume**	57	1			**57**
Pk Hr Factor	0.839				**0.839**	**Pk Hr Factor**	0.548	0.250			**0.548**
7 - 9 Volume	46	0	0	0	**46**	**4 - 6 Volume**	85	1	0	0	**86**
7 - 9 Peak Hour	8:00				**8:00**	**4 - 6 Peak Hour**	17:00	16:00			**17:00**
7 - 9 Pk Volume	34	0	0	0	**34**	**4 - 6 Pk Volume**	52	1	0	0	**52**
Pk Hr Factor	0.425	0.000	0.000	0.000	**0.425**	**Pk Hr Factor**	0.813	0.250	0.000	0.000	**0.813**

Prepared by NDS/ATD

IN & OUT

4141 Whitsett Ave Weddington Golf & Tennis N/O Valleyheart Dr

Day: Tuesday
Date: 2/12/2019

City: Studio City
Project #: 19-5073-002

DAILY TOTALS	IN	OUT			Total
	15	509			524

AM Period	IN	OUT	TOTAL	PM Period	IN	OUT	TOTAL
0:00	0	1	1	12:00	0	10	10
0:15	0	0	0	12:15	0	14	14
0:30	0	0	0	12:30	0	10	10
0:45	0	0	0 1	12:45	0	3	3 37
1:00	0	0	0	13:00	0	11	11
1:15	0	0	0	13:15	0	7	7
1:30	0	0	0	13:30	0	3	3
1:45	0	0	0	13:45	0	7	7 28
2:00	0	0	0	14:00	0	9	9
2:15	0	0	0	14:15	0	5	5
2:30	0	0	0	14:30	0	6	6
2:45	0	0	0	14:45	1	1 8	9 29
3:00	1	0	1	15:00	1	14	15
3:15	0	0	0	15:15	0	8	8
3:30	0	0	0	15:30	0	11	11
3:45	2	3 1 1	3 4	15:45	1	2 15	16 50
4:00	1	1	2	16:00	0	24	24
4:15	0	1	1	16:15	0	4	4
4:30	0	0	0	16:30	0	7	7
4:45	0	1 0 2	0 3	16:45	0	6	6 41
5:00	0	0	0	17:00	0	18	18
5:15	0	0	0	17:15	0	22	22
5:30	0	2	2	17:30	1	23	24
5:45	0	0 2	0 2	17:45	1	2 8	9 73
6:00	1	0	1	18:00	0	22	22
6:15	0	0	0	18:15	0	5	5
6:30	0	0	0	18:30	0	3	3
6:45	0	1 1 1	1 2	18:45	0	9	9 39
7:00	0	0	0	19:00	0	18	18
7:15	1	0	1	19:15	0	6	6
7:30	0	2	2	19:30	0	6	6
7:45	0	1 1 3	1 4	19:45	0	6	6 36
8:00	1	1	2	20:00	0	18	18
8:15	1	3	4	20:15	0	7	7
8:30	0	1	1	20:30	0	9	9
8:45	0	2 2 7	2 9	20:45	1	1 7	8 42
9:00	0	5	5	21:00	0	6	6
9:15	0	2	2	21:15	0	3	3
9:30	0	1	1	21:30	0	7	7
9:45	0	2 10	2 10	21:45	1	1 3	4 20
10:00	0	14	14	22:00	0	2	2
10:15	0	11	11	22:15	0	2	2
10:30	0	4	4	22:30	0	0	0
10:45	0	8 37	8 37	22:45	0	3	3 7
11:00	0	29	29	23:00	0	2	2
11:15	0	8	8	23:15	0	2	2
11:30	0	4	4	23:30	0	0	0
11:45	0	5 46	5 46	23:45	0	0 4	0 4
TOTALS	8	110	**118**	**TOTALS**	7	399	**406**
SPLIT %	6.8%	93.2%	**22.5%**	**SPLIT %**	1.7%	98.3%	**77.5%**

DAILY TOTALS	IN	OUT			Total
	15	509			524

AM Peak Hour	3:00	10:15			**10:15**	**PM Peak Hour**	14:15	17:15			**17:15**
AM Pk Volume	3	52			**52**	**PM Pk Volume**	2	75			**77**
Pk Hr Factor	0.375	0.448			**0.448**	**Pk Hr Factor**	0.500	0.815			**0.802**
7 - 9 Volume	3	10	0	0	**13**	**4 - 6 Volume**	2	112	0	0	**114**
7 - 9 Peak Hour	7:15	7:30			**7:30**	**4 - 6 Peak Hour**	17:00	17:00			**17:00**
7 - 9 Pk Volume	2	7	0	0	**9**	**4 - 6 Pk Volume**	2	71	0	0	**73**
Pk Hr Factor	0.500	0.583	0.000	0.000	**0.563**	**Pk Hr Factor**	0.500	0.772	0.000	0.000	**0.760**

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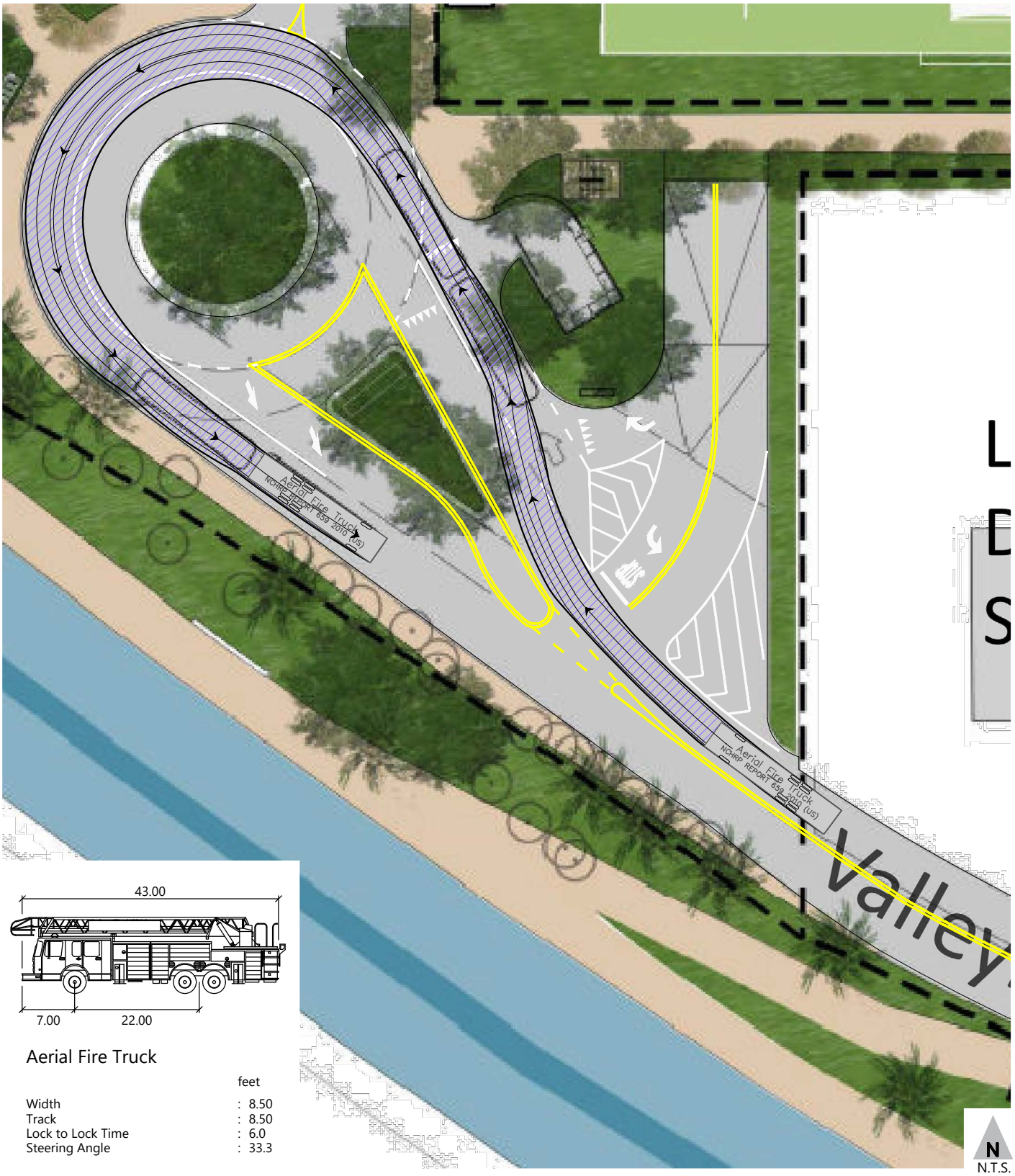

Figure M-3

Fire Truck (NCHRP Report Aerial Fire Truck) Autoturn
Harvard Westlake

CONCEPTUAL - NOT FOR CONSTRUCTION. ADDITIONAL
DETAILED ANALYSIS AND ENGINEERING DESIGN REQUIRED.

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