



The Curtis School Master Plan Project

Case Number: ENV-2017-3972-MND

Project Location: 15871 W. Mulholland Drive, Los Angeles, CA 90049

Community Plan Area: Encino–Tarzana

Council District: 5—Paul Koretz

Project Description: The Project proposes a modification to an existing educational facility, including the removal of approximately 23,010 square feet of existing buildings and the addition of approximately 82,940 square feet of new school facilities, including the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Gymnasium Building, and a new Commons Building, for a net increase of 59,930 square feet. Maximum building heights would range from 16 feet for new and expanded classrooms up to 40 feet for the proposed Commons Building and Performing Arts Building. The Gymnasium Building is proposed at a height of approximately 37 feet. Upon buildout of the Project, the Project Site would consist of 130,053 square feet of school facilities. The Project would add between 10 to 20 new classrooms, including between seven and 10 specialty learning classrooms for art, science and technology. The Project would not add any additional homeroom classrooms, and the Project would not increase Curtis School's 675 student enrollment cap. The Project would also reconfigure the parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields. A total of approximately 189 marked parking spaces would be provided in the newly relocated surface parking areas. Project buildout would be phased over time and could start as early as 2021 and end as late as 2035.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

The Curtis School Foundation

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1 INTRODUCTION

This Subsequent Mitigated Negative Declaration (Subsequent MND) evaluates the potential environmental effects that could result from proposed modifications to The Curtis School Master Plan Project (Project) that were not previously evaluated in the Original EIR and MND discussed further below. This Subsequent MND has been prepared in accordance with CEQA (Public Resources Code Section 21000 *et seq.*), the State CEQA Guidelines (Title 14, California Code of Regulations Section 15000 *et seq.*), and the City of Los Angeles CEQA Guidelines (1981, amended 2006). The City of Los Angeles (City) uses Appendix G of the State CEQA Guidelines as the thresholds of significance unless another threshold of significance is expressly identified in the document. This Subsequent MND is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PROJECT BACKGROUND

Curtis School has operated on the Project Site since 1983, pursuant to conditional use permits approved and issued in 1980 (No. 80-989; CPC-28764-CU) (1980 CUP) and 1990 (No. 89-763; CPC-1989-763-CU) (1990 CUP), collectively referred to herein as the Existing CUP.

According to information set forth in the 1980 CUP and its related environmental documents, the 1980 CUP authorized approximately 112,700 square feet of new structures and approximately 500,000 total cubic yards of grading activity. An Environmental Impact Report (EIR- 94-77-CUC) (Original EIR) was prepared in connection with the initial master plan project ultimately approved in the 1980 CUP. The Original EIR describes a development envelope of approximately 151,500 square feet of new structures and approximately 615,000 cubic yards of grading activity. The 1980 CUP, however, did not approve the full development envelope set forth in the Original EIR. Specifically, according to a Supplemental Report to the Original EIR and an additional City of Los Angeles Staff Report analyzing the adequacy of the Original EIR and Supplemental Report, reductions in the proposed development envelope resulted in an approved project comprised of approximately 112,700 square feet of new structures on the Project Site. The Project Site is currently improved with approximately 70,123 square feet of existing structures and approximately 42,577 square feet of structures authorized by the 1980 CUP currently remain undeveloped.

The Supplemental Report and additional City of Los Angeles Staff Report also establishes that approximately 500,000 cubic yards of grading were approved by the 1980 CUP. According to the Los Angeles Department of Building and Safety records, grading permits for approximately 466,826 cubic yards of grading have occurred on the Project Site over time. Approximately 464,000 cubic yards of grading occurred sometime in 1981 or 1982 (a grading permit for this amount was issued on June 9, 1981) in connection with the initial development of the Project Site. The remaining 2,826 cubic yards of grading occurred later in time. Therefore, Curtis School has not used 33,174 cubic yards of its grading authorized by the 1980 CUP.

The 1990 CUP entailed a modification of the 1980 CUP, although most of the approvals in the 1980 CUP were subsequently carried forward and not altered. The 1990 CUP did not authorize any new construction above the 112,700 square feet previously authorized by the 1980 CUP. The 1990 CUP

merely permitted a student enrollment increase of 200 students from the 475 students originally approved in the 1980 CUP, for a total permitted enrollment of up to 675 students, along with an increase of 16 teachers, faculty, and staff from the 52 originally approved in the 1980 CUP, for a resulting total of 68 teachers, faculty, and staff.

The enrollment and staffing changes ultimately approved in the 1990 CUP were analyzed in a Mitigated Negative Declaration (MND-89-488-CUC) (1989 MND). The 1989 MND concluded that there were no significant impacts that would result from these increases. Curtis School's currently approved student enrollment remains at 675 students, and the currently approved number of teachers, faculty, and staff remains at 68.

1.2 PURPOSE OF THIS SUBSEQUENT MND

The California Environmental Quality Act was enacted in 1970 with several basic purposes, including: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

Implementation of the Project would result in a maximum development envelope of approximately 130,053 square feet of total floor area within the Curtis School. This would be approximately 17,353 square feet (approximately 15 percent) more than the development envelope currently approved for the Project Site by the 1980 CUP. In addition, while the Project would concentrate the majority of the proposed structures within the same area contemplated by the 1980 CUP's master plan, a portion of the proposed Gymnasium Building would be located within 500 feet from Mulholland Drive. While the Project does not propose an increase in the currently permitted student enrollment of 675 students, the Project includes a total of 50 additional faculty and staff members which would increase the number of teachers, faculty, and staff from 68 to 118. Therefore, this Subsequent MND is being prepared to analyze whether there are any new potential significant impacts associated with the Project that were not previously evaluated in the Original EIR and MND discussed above.

1.3 ORGANIZATION OF THIS SUBSEQUENT MND

This Subsequent MND is organized into sections as follows:

1. INTRODUCTION

Describes the purpose and content of the Subsequent MND and provides an overview of the CEQA process.

2. EXECUTIVE SUMMARY

Provides Project information, identifies key areas of environmental concern, and includes a determination of whether the Project may have a significant effect on the environment.

3. PROJECT DESCRIPTION

Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.

4. EVALUATION OF ENVIRONMENTAL IMPACTS

Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.

1.4 CEQA PROCESS

State CEQA Guidelines Section 15162 states that when an Environmental Impact Report (EIR) has been certified or negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or*
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:*
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Additionally, Section 15163 of the CEQA Guidelines provides that the lead or responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

- (1) *Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and*
- (2) *Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.*

Furthermore, Public Resources Code Section 21166 states that when an EIR has been prepared for a project, no subsequent or supplemental EIR shall be required by the lead agency or by any responsible agency, unless one or more of the following events occur:

- (a) *Substantial changes are proposed in the project which will require major revisions of the environmental impact report.*
- (b) *Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.*
- (c) *New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.*

State CEQA Guidelines Section 15162(b) provides that if there are substantial changes to a project or its circumstances, or new information becomes available, after a negative declaration has been adopted for a project, the lead agency may elect to prepare a subsequent negative declaration. (*Temecula Band of Luiseno Mission Indians v. Rancho Cal. Water Dist.* (1996) 43 Cal.App.4th 425; *Benton v. Bd. of Supervisors* (1991) 226 Cal.App.3d 1467.) Furthermore, a lead agency may elect to prepare and adopt a subsequent mitigated negative declaration (MND) when a subsequent EIR would otherwise be required but the project's new significant impacts can be significantly reduced or avoided through appropriate mitigation measures. (*Friends of the College of San Mateo Gardens v. San Mateo County Community College Dist.* (2017) 11 Cal.App.5th 596, 611; *Long Beach Sav. & Loan Ass'n v. Long Beach Redev. Agency* (1986) 188 Cal.App.3d 249.)

While substantial changes to the Project are not proposed and substantial changes to the circumstances have not occurred that would require major revisions to the Original EIR and MND, the Project would increase the development envelope previously established for the Project Site. In addition, the Project proposes to increase the number of faculty and staff members. These proposed modifications could potentially result in one or more significant effects not discussed in the Original EIR or MND. As such, this Subsequent MND is being prepared to analyze whether there are any new potential significant impacts associated with the Project that were not previously evaluated in the Original EIR and MND.

Consistent with Section 15150 of the CEQA Guidelines, the following documents were used in preparation of this Subsequent MND and are incorporated herein by reference:

- Proposed Mitigated Negative Declaration, MND-89-488-CUC, June 1989.
- Final Supplemental Report, EIR No. 94-77-CUC, May 1979.
- Proposed Private Preparatory School Draft Environmental Impact Report, EIR Case No. 94-77-CUC, February 1978.

Pursuant to CEQA Guidelines, Section 15150(b), the above documents are available for review. As a result of the Mayor's "Safer at Home" Order issued on March 19, 2020, means to access project-related materials in-person may be limited. To that end, the Department of City Planning will ensure that interested parties seeking information about the Project will have access. The files are also available at the following location during the hours of 9:00 A.M. and 5:00 P.M.

Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, California 90012

Please contact the Staff Planner listed below to access the files or make an appointment to view the files.

Tim Fargo
6262 Van Nuys Boulevard, Room 430
Van Nuys, CA 91401
tim.fargo@lacity.org

2 EXECUTIVE SUMMARY

| | |
|------------------------|--|
| PROJECT TITLE | The Curtis School Master Plan |
| ENVIRONMENTAL CASE NO. | ENV-2017-3972-MND |
| RELATED CASES | CPC-1989-763-CU-PA2, CPC-1989-763-CU, CPC-28764-CU, MND-89-488-CUC |

| | |
|--------------------------|---|
| PROJECT LOCATION | 15871 W. Mulholland Drive, Los Angeles, CA 90049 |
| COMMUNITY PLAN AREA | Encino–Tarzana |
| GENERAL PLAN DESIGNATION | Very Low II Residential |
| ZONING | RE-15-1-H (Residential Estate, Height District 1) |
| COUNCIL DISTRICT | 5—Koretz |

| | |
|-------------------------|---|
| LEAD CITY AGENCY | City of Los Angeles |
| STAFF CONTACT | Tim Fargo |
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|----------------------|---|
| APPLICANT | The Curtis School Foundation |
| ADDRESS | 15871 Mulholland Drive Los Angeles, CA 90049 |
| PHONE NUMBER (AGENT) | Alexander M. DeGood Cox, Castle & Nicholson LLP 2029 Century Park East, Suite 2100 Los Angeles, CA 90067 (310) 284-2200 |

PROJECT DESCRIPTION

The Project proposes the removal of approximately 23,010 square feet of existing facilities and the addition of approximately 82,940 square feet of new school facilities including the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Gymnasium Building, and a new Commons Building, for a net increase of 59,930 square feet. Maximum building heights would range from 16 feet for new and expanded classrooms up to 40 feet for the proposed Commons Building and Performing Arts Building. The Gymnasium Building is proposed at a height of approximately 37 feet. Upon buildout of the Project, the Project Site would consist of

130,053 square feet of school facilities. The Project would add between 10 to 20 new classrooms, including between seven and 10 specialty learning classrooms for art, science and technology. The Project would not add any additional homeroom classrooms and the Project would not increase Curtis School's 675 student enrollment cap. The Project would also reconfigure the parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields. A total of approximately 189 marked parking spaces would be provided in the newly relocated surface parking areas. Project buildout would be phased over time and could start as early as 2021 and end as late as 2035.

For additional detail, see Section 3, Project Description.

ENVIRONMENTAL SETTING

The Project Site is located in the Santa Monica Mountains in an area that is developed with residential and educational uses. Land uses surrounding the Project Site include single-family residences to the north, the Milken Community Schools to the south and west across Mulholland Drive and the I-405 to the east. Additional educational facilities are also located farther to the west along Mulholland Drive. The relatively steep topography within the perimeter of the Project Site generally provides a visual and physical barrier between the Project Site and the residential and educational uses to the north and south. The San Diego Freeway (I-405) is located approximately 0.1 mile east of the Project Site.

For additional detail, see Section 3, Project Description.

OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

To be determined.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

None of the environmental factors listed below would be significantly affected by the Project, as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

EVALUATION OF ENVIRONMENTAL IMPACTS

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Curtis School Master Plan Project (the Project) consists of improvements to the existing Curtis School campus (Project Site) located in the Encino–Tarzana Community of the City of Los Angeles (City). The Project proposes the removal of some existing buildings; the reconfiguration, rehabilitation, and expansion of existing educational facilities; construction of new buildings; redefinition of the existing open space and gardens; and the reconfiguration of existing parking lots and athletic fields. The proposed improvements are intended to modernize the campus and reconfigure aging facilities to allow Curtis School to incorporate current teaching methods, techniques, and technologies by creating specialty classroom spaces (e.g., science and art) and providing separate athletic facilities (e.g., gym and athletic building).

The Project specifically proposes the removal of approximately 23,010 square feet of existing school facilities within the Curtis School campus and the addition of approximately 82,940 square feet of new school facilities, including the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Gymnasium Building, and a new Commons Building, for a net increase of 59,930 square feet. Maximum building heights would range from 16 feet for new and expanded classrooms and up to 40 feet for the proposed Commons Building and Performing Arts Building. The Gymnasium Building would be approximately 37 feet in height. Upon buildout of the Project, the Curtis School campus would consist of 130,053 square feet of school facilities.

The Project would reconfigure the surface parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields. Upon completion of the Project, a total of 189 marked parking spaces would be provided in the newly relocated surface parking areas.

The Project would add between 10 to 20 new classrooms, including between seven and 10 specialty learning classrooms for art, science and technology. The Project would not add any additional homeroom classrooms and the existing permitted enrollment cap of 675 students would remain. Project buildout would be phased over time and could start as early as 2021 and end as late as 2035.

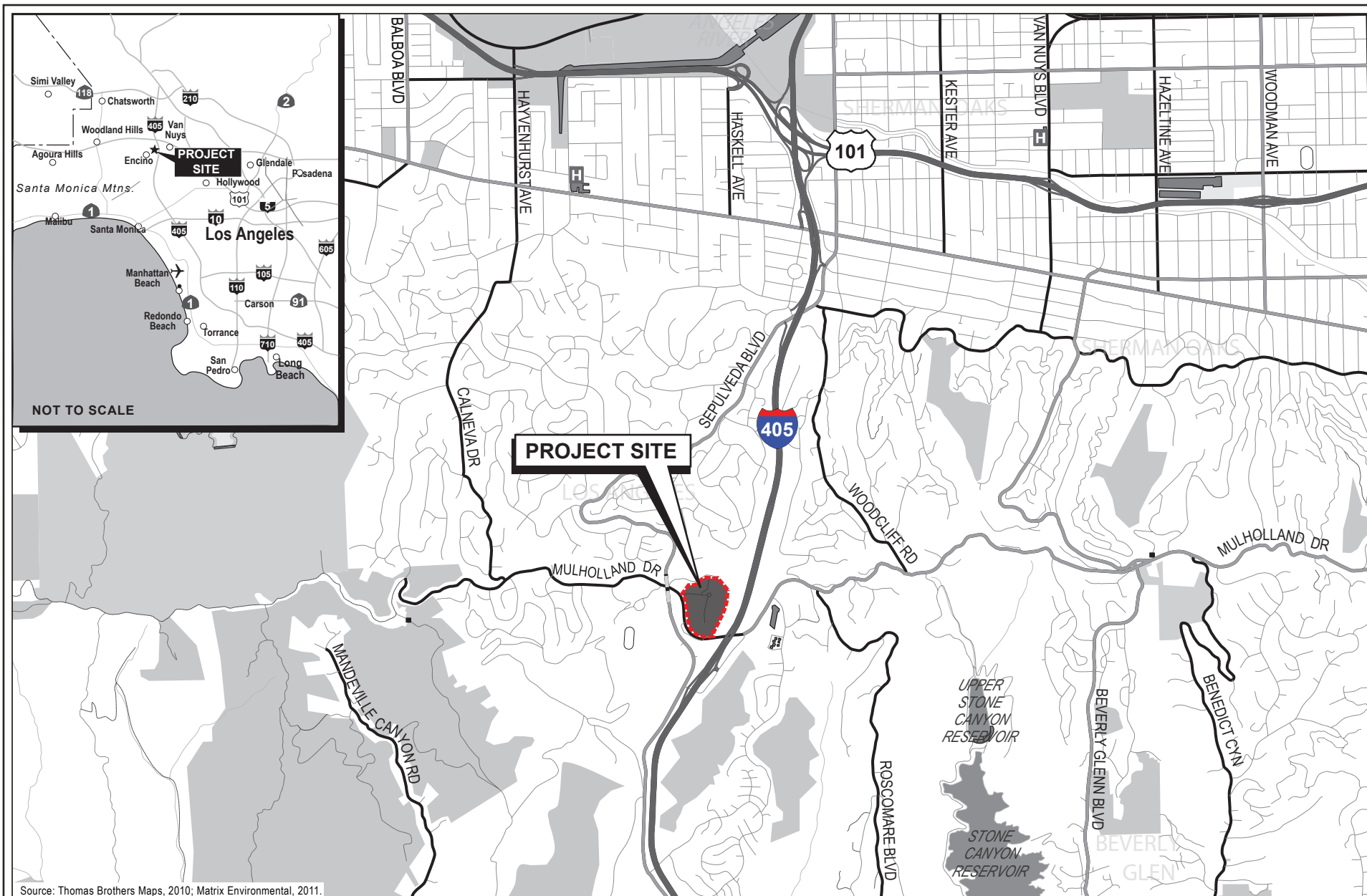
3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The 27-acre Project Site is located at 15871 W. Mulholland Drive within the Encino–Tarzana Community of the City of Los Angeles. As shown in Figure 1 on page 11, regional access to the Project Site is provided by the San Diego Freeway (I-405 Freeway), located approximately 0.1 mile east of the Project Site, and local access is provided by Mulholland Drive, located along the southern boundary of the Project Site.

3.2.2 Existing Conditions

Curtis School has operated on the Project Site since 1983, pursuant to a conditional use permit approved and issued on May 2, 1980 (No. 80-989; CPC-28764-CU) and modified on April 12, 1990 (No. 89-763;



e y e s t o n e
ENVIRONMENTAL

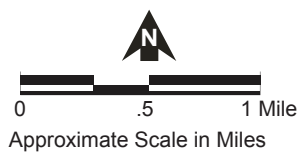


Figure 1
Project Location and Boundaries

CPC-1989-763-CU) (Existing CUP). The Existing CUP authorized the Project Site's existing improvements, discussed in more detail below. The Existing CUP authorized approximately 112,700 square feet of phased development. The Existing CUP's approved development program has not been completely utilized. Currently, the Project Site is improved with approximately 70,123 square feet of existing structures. The Project, as described further below, proposes a modification of the existing education facilities, including the demolition of some existing structures and the development of new structures. Upon buildout of the Project, the Curtis School would include an overall square footage of approximately 130,053 square feet, inclusive of existing structures to be retained and new structures proposed as part of the Project.

As shown in Figure 2 on page 13 and summarized in Table 1 on page 14, the Project Site is currently improved with approximately 70,123 square feet of existing educational facilities, including, but not limited to, several educational buildings, including the 7,000-square-foot Tuttle Building, three Classroom Buildings encompassing approximately 23,000 square feet, the 10,140-square-foot Ahmanson Building, the 11,000-square-foot Pavilion, the 6,800-square-foot Administration Building, a 2,300-square-foot Library, and a 3,900-square-foot Head of School's residence. The Project Site also includes athletic fields, a pool, play structures and ball courts comprising approximately 2,500 square feet, and approximately 3,370 square feet of ancillary facilities and a maintenance yard. Landscaped walkways are also located throughout the Project Site. Curtis School currently provides 35 classrooms and specialty classrooms. The existing campus also includes three surface parking areas east of the athletic fields. These surface parking areas provide a total of 135 parking spaces for visitor and staff parking.

3.2.2.1 Access and Circulation

All access to the Project Site is from Mulholland Drive where the Project Site's entrance at Walt Disney Drive connects with an internal circular driveway along the front of the Ahmanson Building. A second emergency entrance is provided from Mulholland Place on the north side of the campus.

The Existing CUP requires carpooling efforts for getting to and from the Curtis School, which serve to reduce the number of trips to/from the campus. Specifically, the Curtis School's Existing CUP requires 80 percent of the students and 50 percent of the staff to carpool/rideshare/bus/vanpool. The Curtis School is required to provide the Los Angeles Department of Transportation (LADOT) with annual compliance reports demonstrating compliance with this existing condition of approval. The Curtis School has continuously provided required compliance reports to LADOT since this condition was imposed.

3.2.2.2 Land Use and Zoning

The Project Site is designated for Very Low II Residential land uses by the Encino–Tarzana Community Plan. The Project Site is also located within the boundaries of the Mulholland Scenic Parkway Specific Plan (the Specific Plan). The Specific Plan designates areas along the Mulholland Drive right-of-way within the Project Site's general vicinity as being within the Institutional Use Corridor. As defined by the Specific Plan, the Project Site is located within both the Inner Corridor and the Outer Corridor. The Specific Plan expressly allows educational institutions, provided they are located within the Institutional Use Corridor, which, in regards to the Project area, is substantially the same as the Inner Corridor.

In addition to the Project Site's location in the Specific Plan, the Project Site is zoned by the Los Angeles Municipal Code (LAMC) as RE-15-1-H (Residential Estate, Height District 1). In accordance with the



Source: Ehrenkrantz Eckstut & Kuhn Architects, 2011.

Table 1
Conceptual Development Program^a

| Use | Existing Development | To Be Removed | Proposed Development | Total Development | Net New Development |
|--------------------------------|------------------------|--------------------|------------------------|-------------------|---------------------|
| Academics | 30,000 sf ^b | (7,000 sf) | 12,390 sf ^f | 35,390 sf | 5,390 sf |
| Arts | 21,253 sf ^c | (10,140 sf) | 24,300 sf ^g | 35,413 sf | 14,160 sf |
| Athletics | 2,500 sf ^d | (2,500 sf) | 23,400 sf ^h | 23,400 sf | 20,900 sf |
| Commons | 16,370 sf ^e | (3,370 sf) | 22,850 sf ⁱ | 35,850 sf | 19,480 sf |
| Total Project Site Area | 70,123 sf | (23,010 sf) | 82,940 sf | 130,053 sf | 59,930 sf |
| Total Parking Spaces | 135 sp | (135 sp) | 189 sp | 189 sp | 54 sp |

sp = spaces

^a This Conceptual Development Program represents one of the possible ways the Project may be developed. The Project is anticipated to be developed in several phases. The number of phases and amount of development within each phase would be governed by funding available to Curtis School at a certain time. Total development, however, would not exceed the maximum proposed development of 82,940 square feet of new structures, the removal of approximately 23,010 square feet of existing structures, and the reconfiguration of the existing parking lot and athletic fields and associated grading work all as described in more detail below.

^b Includes the 7,000-square-foot Tuttle Building and three Classroom Buildings comprising 23,000 square feet.

^c Includes the 10,140-square-foot Ahmanson Building and the 11,000-square-foot Pavilion.

^d Includes 2,500 square feet of play structures and courts.

^e Includes the 6,800-square-foot Administration Building, the 2,300-square-foot Library, the 3,900 square-foot Head of School's residence, and 3,370 square feet of facilities/maintenance yard.

^f Includes the addition of approximately 2,500 square feet of classroom space, the 6,140-square-foot Classroom Building, and the 3,750-square-foot Science Building.

^g Includes the approximately 18,300-square-foot Performing Arts Building and the 6,000-square-foot Pavilion Back of House.

^h Includes the approximately 14,800-square-foot Gymnasium Building and the 8,600-square-foot Athletics Building.

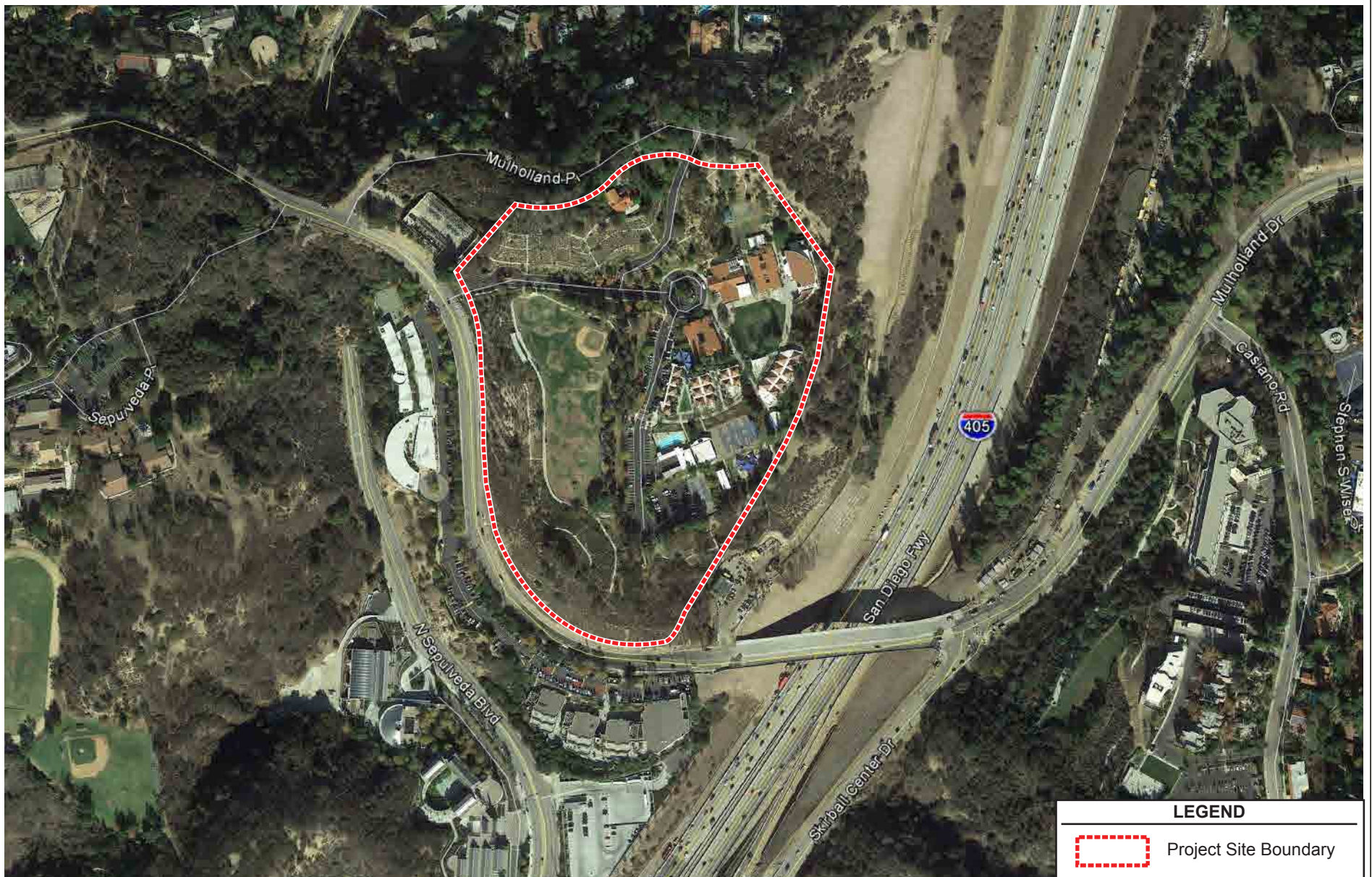
ⁱ Includes approximately 8,200 square feet of ancillary facilities, 6,200 square feet of new dining area, 6,150 square feet of new library space, and 2,300 square feet of additional administrative uses.

Source: Eyestone Environmental, 2021.

LAMC, educational uses are permitted under the RE zone with a Conditional Use Permit. Curtis School operates under the Existing CUP, which establishes specific conditions for the Project Site. Such conditions include a maximum enrollment of 675 students and prohibition of construction of educational facilities and recreation and parking areas within 500 feet and 100 feet, respectively, from Mulholland Drive. As detailed in Attachment B, the existing approvals required development of all structures in the precise area where educational uses are currently prohibited by the Specific Plan, yet structures with other uses would be permitted.

3.2.3 Surrounding Land Uses

As shown in Figure 3 on page 15, the Project Site is located in the Santa Monica Mountains in an area that is developed with residential and educational uses. As shown in Figure 3, land uses surrounding the Project Site include single-family residences to the north, the Milken Community Middle School and



Source: Google Earth Pro, 2014

Figure 3
Aerial View of Campus

High School to the south and west, respectively, and the I-405 Freeway to the east. Additional educational facilities are also located farther to the west along Mulholland Drive, including Milken Community High School, Saperstein Middle School, and Berkeley Hall School. The relatively steep topography within the perimeter of the Project Site generally provides a visual and physical barrier between the Project Site and the residential and educational uses to the north and south.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project proposes the reconfiguration, rehabilitation, and expansion of existing educational facilities, construction of new buildings, redefinition of the existing open space and gardens, and the reconfiguration of parking lots and athletic fields.

As set forth in Table 1 on page 14 and described in more detail below, the Project specifically proposes the removal of approximately 23,010 square feet of existing school facilities and the addition of approximately 82,940 square feet of new school facilities including, but not limited to, the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Commons Building, and a new Gymnasium Building. It is noted that Table 1 illustrates how development within the Project Site may occur and, along with the athletic fields/parking lot reconfiguration, Table 1 sets forth the maximum development that could be constructed in connection with the Project. Upon buildout of the Project, the Project Site would consist of approximately 130,053 square feet of school facilities.

As shown in Table 1, the Project would include the expansion of existing academic space through the addition of approximately 5,390 square feet of net new classroom space. In addition, the Project proposes the demolition of approximately 7,000 square feet of existing academic facilities and the construction of approximately 9,890 square feet of new academic classrooms, including the 6,140-square-foot Classroom Building and the approximately 3,750-square-foot Science Building. The Project also includes the construction of the approximately 18,300-square-foot Performing Arts Building. In addition, the Project proposes the demolition of approximately 10,140 square feet of existing arts facilities and 6,000 square feet of new construction for Pavilion Back of House space. Additionally, the Project proposes the removal of 3,370 square feet of common space and 22,850 square feet of new common space, including 6,200 square feet of dining, a 6,150-square-foot addition to the existing library, and a 2,300-square-foot addition to the Administration Building. The Project also proposes the demolition of 2,500 square feet of existing athletic facilities and approximately 23,400 square feet of new construction, including the approximately 14,800-square-foot Gymnasium Building and the approximately 8,600-square-foot Athletics Building.

The Project would add between 10 to 20 new classrooms, including between seven and 10 specialty learning classrooms for art, science, and technology. The Project would not add any additional homeroom classrooms. A conceptual site plan for buildout of the Project is provided in Figure 4 on page 17.

As previously noted, the Project would also reconfigure the location of the parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields. Upon buildout of the Project, a total of approximately 189 marked parking spaces would be provided in the



Source: Ehrenkrantz Eckstut & Kuhn Architects, 2013.

newly relocated surface parking areas, which would be accessed from Walt Disney Drive. The Project also includes a hierarchy of open spaces that would define “academic neighborhoods” by organizing classrooms within one area, clustering the arts around the existing Multi-use Pavilion, and locating the athletic facilities next to the athletic fields and ball courts.

Development of the Project would require grading and excavation, primarily for construction of the proposed Performing Arts Building and the reconfiguration of the existing athletic fields and parking lot. A detailed description of proposed grading activities is provided below in Subsection 4, Proposed Construction Activities and Haul Route.

As previously described, the Project is intended to modernize the campus and reconfigure aging facilities to incorporate current technologies into the classroom and to provide for separate artistic and athletic facilities. The proposed improvements would provide permanent and upgraded facilities to accommodate the educational needs of up to 675 school students (the current capacity limit authorized by the Existing CUP). In addition, in order to respond to a more demanding teacher-to-student ratio present today, a total of approximately 50 additional faculty and staff members could be employed over currently permitted faculty and staff.

Buildout of the Project is anticipated to occur in several phases, with construction commencing as early as 2021 and ending as late as 2035. The Project is designed as a Master Plan, which is intended to establish the maximum development that can occur on the Project Site, and to serve as a development guide for the foreseeable future. Accordingly, the conceptual development program provided in Table 1 on page 14 represents a reasonable scenario of how buildout of the Project Site may occur based on current market conditions and the needs identified for the Project Site. That is, the conceptual development program provided in Table 1 represents just one of the possible ways the Project Site may be developed. However, total development would not exceed 82,940 square feet of new structures that would be configured for educational uses, arts uses, and athletic uses. In any case, maximum student enrollment would not increase beyond the currently permitted enrollment of 675 students.

The number of phases and the development within each phase would be governed by future market conditions and the needs and demands of the Project Site. Specifically, under the exchange of uses, there may be increases in the square footages of certain proposed structures in exchange for corresponding decreases in the square footages of other proposed structures as long as no additional environmental impacts would occur above those addressed in this Initial Study and total development does not exceed the maximum development for the Project as described and analyzed in this Initial Study. While a structure’s precise square footage and specific programming (e.g., specialty classroom, science classroom, music classroom, dining area, library space) may change, the overall building footprint and the general location and proposed height of the structures would be as set forth in the conceptual site plan provided in Figure 4 on page 17.

3.3.2 Design and Architecture

The new and expanded buildings would be similar in scale, massing, and height to existing facilities. Heights of the new buildings would range from 16 feet for proposed new classroom buildings and expansion of existing classrooms and up to 40 feet in height for the proposed new Performing Arts Building. The applicable Specific Plan regulations permit a height of 40 feet in the Outer Corridor (more than 500 feet from Mulholland Drive). Therefore, based on the proposed heights, the Project would be

consistent with the permissible height limits within the Outer Corridor. A portion of the proposed Gymnasium/Athletic Building, however, would be located in the Inner Corridor (within 500 feet of Mulholland Drive) where the Specific Plan allows a maximum height of 30 feet. The proposed Gymnasium/Athletic Building is proposed to have a maximum height of 37 feet to accommodate indoor height requirements for volleyball and to maintain architectural consistency. Thus, as provided below, a Specific Plan height exception would be requested to permit a maximum height of 37 feet in lieu of the permitted height of 30 feet within the Inner Corridor.

The Project would also include the installation of three retaining walls with a maximum height of 12 feet. These retaining walls would be located within the campus and would not be visible from Mulholland Drive.

3.3.3 Open Space and Landscaping

As part of the Project, new landscaping, landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors. Opportunities for outdoor classroom areas and learning opportunities that are engaged with the landscape would also be provided.

3.3.4 Access, Circulation, and Parking

Primary access to the Project Site would be unchanged and would continue to be from Mulholland Drive. As part of the Project, Curtis School would continue to operate under the Existing CUP's transportation standards requiring 80 percent of the students and 50 percent of the staff to carpool, rideshare, bus, or vanpool.

Upon implementation of the Project, on-site pedestrian circulation would be improved by providing additional landscaped walkways and eliminating the pedestrian-vehicular conflicts associated with students crossing the existing surface parking lots to access the athletic fields.

As discussed above, the Project would reconfigure the parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields. Upon completion of the Project, a total of 189 marked parking spaces would be provided in the newly relocated surface parking areas, which would be accessed from Walt Disney Drive.

3.3.5 Lighting and Signage

The Project proposes additional lighting on the campus to provide clear identification of circulation, gathering spaces, and parking facilities; to provide for the security of students, faculty, staff, and visitors; and to support athletic and other extra-curricular activities. Pedestrian path lighting would be of low intensity and integrated within the architectural features. The Project would not include night sports lighting for the outdoor athletic facilities.

The Project proposes to maintain existing signage and proposes new, on-site signage. Proposed signage would consist primarily of signs to identify the School and its buildings, information signs to direct vehicular and pedestrian circulation, and outdoor athletic signs. New buildings would have wall mounted signs identifying the name of the building and donor or sponsor information. The Project would also

include new informational signs throughout the Project Site for wayfinding purposes as necessary to direct vehicular and pedestrian circulation and for other informational purposes. These signs may be mounted on walls, fences, and metal posts. Proposed signs may also be backlit or illuminated with landscape lights.

3.3.6 Site Security

Curtis School maintains a closed campus requiring all visitors, guests, and vendors to have appointments prior to being granted access. The Curtis School also maintains full-time security guards during all campus hours.

3.3.7 Sustainability Features

The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would be designed to meet the requirements for the U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver or equivalent.

3.3.8 Anticipated Construction Schedule

As discussed above, buildout of the Project is anticipated to occur as a phased development with construction commencing as early as 2021 and ending as late as 2035. Construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Grading and excavation for Project development would primarily be associated with construction of the proposed Performing Arts Building and the reconfiguration of the existing athletic fields and parking lot. It is anticipated that full Project buildout would require approximately 115,229 cubic yards of grading. While all efforts would be made to balance earthwork within the Project Site, buildout of the Project is anticipated to require approximately 75,700 cubic yards of export. Haul trucks would travel to and from the Project Site via a designated haul route. Specifically, construction haul trucks would access the Project Site via the I-405 Freeway. Haul trucks arriving and leaving the Project Site would travel via Mulholland Drive to the I-405 Freeway north to the I-5 Freeway north to the Sunshine Canyon Landfill.

3.4 REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. This Subsequent Mitigated Negative Declaration analyzes the impacts associated with the Project and provides environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, the following:

- A Plan Approval pursuant to LAMC Section 12.24.M for modifications to the Project's Existing CUP and master plan;
- A Specific Plan Exception from LAMC Section 5.A.2.b pursuant to LAMC Section 11.5.7 to permit educational uses within the Outer Corridor;

- A Specific Plan Exception from LAMC Section 5.B.1.a of the Mulholland Scenic Parkway Specific Plan pursuant to LAMC Section 11.5.7 to allow grading of a prominent ridge (nearest Mulholland Drive) in excess of 1,000 cubic yards;
- A Specific Plan Exception from Section 5.D.2.b of the Mulholland Scenic Parkway Specific Plan pursuant to LAMC Section 11.5.7 to permit a height of approximately 37 feet for the proposed gymnasium building located partly within the Inner Corridor in lieu of the maximum permitted height of 30 feet;
- Design Review Determination pursuant to LAMC Section 16.50 for compliance with Section 11 of the Mulholland Scenic Parkway Specific Plan for the proposed Master Plan layout of approximately 130,053 square feet of floor area and facilities located in both the Inner and Outer Corridors;
- Site Plan Review pursuant to LAMC Section 16.05 for development of a project that results in an increase of 50,000 gross square feet or more of non-residential floor area;
- Specific Plan Project Permit Compliance pursuant to LAMC Section 11.5.7.C;
- Zoning Administrator Determination pursuant to LAMC Section 12.24.X.26 for development to exceed the number of retaining walls permitted under the Baseline Hillside Ordinance.
- Zoning Administrator Determination pursuant to LAMC Section 12.24.X.28(a) for grading of up to 115,229 cubic yards, in excess of the by-right limit of 3,200 cubic feet permitted under the Baseline Hillside Ordinance.
- Haul Route permit;
- Grading, excavation, and building permits; and
- Any additional actions as may be deemed necessary or desirable.

In order to implement the Project, various other approvals, permits, and actions would be required by the City of Los Angeles and other responsible agencies. City departments, commissions, and councils that may use this Subsequent Mitigated Negative Declaration in their decision-making process include the Department of Building and Safety, the Planning Department, the Department of Public Works, the Planning Commission, and the City Council.

3.5 RESPONSIBLE AND TRUSTEE PUBLIC AGENCIES

A Responsible Agency under CEQA is a public agency with some discretionary authority over a project or a portion of a project, but which has not been designated the Lead Agency (State CEQA Guidelines Section 15381). No responsible agencies have been identified for the Project.

A Trustee Agency under CEQA is a public agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State. The California Department of Fish and Wildlife (CDFW) has been identified as a trustee agency.

4 ENVIRONMENTAL IMPACT ANALYSIS

The impact assessment provided below is organized into three primary components. First is an analysis of the Project's potential impacts relative to each of the impact areas. Second is a discussion of any mitigation measures that may be required for the Project. Lastly, a conclusion is provided as to whether the Project would result in new significant impacts not previously disclosed in the Original EIR and MND previously prepared.

I. AESTHETICS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Except as provided in Public Resources Code Section 21099, would the project: | | | | |
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista is a panoramic view of a valued visual resource. Based on the City's *2006 L.A. CEQA Thresholds Guide*, panoramic views or vistas provide visual access to a large geographic area, for which the field of view can be wide and extend into the distance. According to the *L.A. CEQA Thresholds Guide*, panoramic views are typically associated with vantage points looking out over a section or urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views include an urban skyline, valley mountain range, the ocean, or other water bodies.

As discussed in Section 3, Project Description, of this Subsequent MND, the Project Site is located within the Mulholland Scenic Parkway Specific Plan Area, which identifies Mulholland Drive as a scenic corridor

recognized for its scenic features and recreational value. Specific visual resources in the vicinity of the Project Site include undeveloped ridges, shrubs, trees and rock outcrops.

Due to the Project Site's location in the Santa Monica Mountains, the topography of the Project Site vicinity is diverse. The relatively steep topography within the perimeter of the Project Site in particular provides a visual and physical barrier between the residential and educational uses to the north and south. In addition, the majority of the Project Site is not visible from adjacent Mulholland Drive or from across the I-405 Freeway when looking west from Longbow Drive and Scadlock Lane.

A ridge, identified by the Mulholland Scenic Parkway Specific Plan as a prominent ridge, runs parallel from the School's entrance towards the east, along Mulholland Drive. A second prominent ridge is located to the north of the Project Site along Mulholland Place. The prominent ridge that runs parallel along a portion of Mulholland Drive is a steep slope, which rises 75 feet above Mulholland Drive and gently slopes 30 feet down towards the School on the opposite side. The ridge, as visible from Mulholland Drive, remains in its natural state, mostly barren, with a few native plants. The ridge on the Curtis School side has been graded for drainage improvements that include v-channels (both parallel and perpendicular to the ridge) to control rainwater flow. In addition to the drainage channels, the backside of the prominent ridge (on the School side) has been graded and filled to develop an athletic field. As described in Section 3, Project Description, the Project proposes to relocate the existing athletic fields and parking lots to create a safer environment for the student population. Relocation of these areas would require grading. However, the proposed grading would be designed to avoid impacts to the nearby prominent ridge as much as feasible and would not alter the nearby ridge's height or that portion visible from adjacent Mulholland Drive. In addition, all grading activity associated with the reconfiguration of the athletic fields and parking lots would occur within the School's interior and would be largely concentrated in the area currently occupied by the athletic fields. As such, development of the Project would not affect the Mulholland Drive or Mulholland Place prominent ridges.

The Mulholland Scenic Parkway Specific Plan also identifies vista points, which provide expansive views from Mulholland Drive to the surrounding terrain and valleys below Mulholland Drive, and trails. The closest vista point to the Project Site is the Grove Overlook Major Vista Point, located approximately 0.4-mile west of the Project Site. Views from the vista point are oriented toward the expansive urbanized valley lying beyond the Santa Monica Mountains. The Project Site is not visible from this major vista point due to the winding road, ridges, and intervening vegetation. Additionally, the nearest trail to the Project Site is the Mulholland core trail, which runs along the southern edge of Mulholland Drive. As described above, the relatively steep topography within the perimeter of the Project Site provides a visual and physical barrier between the surrounding uses. Therefore, Project development would generally be confined to the School's interior and would not affect the nearby Mulholland core trail. As discussed in Section 3, Project Description, of this Subsequent MND, the heights of the new and expanded buildings would range from 16 feet up to 40 feet and would be similar in scale, massing, and height relative to existing facilities. The Project's proposed maximum height of 40 feet would not create view blockages from the adjacent Mulholland Drive since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site which provides a visual and physical barrier between the residential and educational uses to the north and south. In addition, while the School proposes a Specific Plan exception to allow the proposed 37-foot-high Gymnasium Building to exceed the permissible height of 30 feet for an upslope lot within the Inner Corridor, as shown in Figure 5 on page 24, the approximately 7-foot height increase would also not create view blockages from the adjacent Mulholland Drive. Specifically, as shown in Figure 5, the proposed



Gymnasium Building would be largely obscured from view by existing mature trees and other existing landscaping along Mulholland Drive with only a small portion of the Gymnasium Building visible from adjacent Mulholland Drive. Additionally, the retaining walls associated with the reconfiguration of the athletic fields/parking lot and construction of the proposed Arts Building would be located within the campus and would not be visible from Mulholland Drive. Therefore, the existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive.

Landscaping would also be provided along the retaining walls to soften their appearance against the hillsides. In addition, natural colors and materials would be used in the construction of the retaining walls to ensure compatibility with the existing natural setting and to integrate the retaining walls with the surrounding hillside and minimize their visibility against the hillside. Therefore, all visible portions of the retaining wall would be treated with landscaping and the retaining walls would be comprised of compatible colors and materials to minimize their visibility from Mulholland Drive. In accordance with the Mulholland Scenic Parkway Specific Plan, the Project would also be reviewed by the Design Review Board to ensure that the Project's design is consistent with the design and preservation guidelines of the Mulholland Scenic Parkway Specific Plan.

As evaluated above, the Project would not have a substantial adverse effect on a scenic vista. Therefore, impacts to scenic vistas would be less than significant, and no mitigation measures are required.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant Impact. The Project Site is not located along a state scenic highway. The nearest officially designated state scenic highway is California State Route 2 (SR-2), which is located approximately 23 miles northeast of the Project Site.¹ The City's Mobility Plan 2035 identified Mulholland Drive, located adjacent to the Project Site, as a scenic highway.² According to the Mobility Plan, the "scenic feature" for the Mulholland Drive Scenic Highway is its panoramic views and "ribbon of park." The Mobility Plan also states that Mulholland Drive is located within the Mulholland Scenic Parkway Specific Plan Area, as discussed above, which imposes design and development regulations. However, even if the City's designation of Mulholland Drive as a City-designated scenic highway is assumed to be on par with a state-designated scenic highway, the Project would not result in the removal of rock outcroppings or historic buildings, and construction would generally occur in areas of the Project Site that have already been developed with similar uses. In addition, while relocation of the existing athletic fields and parking lots would require grading near a ridge that runs along Mulholland Drive, the proposed grading at this location would be designed to avoid impacts to the nearby prominent ridge as much as feasible and would not alter the nearby ridge's height or that portion visible from adjacent Mulholland Drive. In addition, all grading activity associated with the reconfiguration of the athletic fields and parking lots would occur within the School's interior and would be largely concentrated in the area currently occupied by the athletic fields. As such, development of the Project would not affect the Mulholland Drive or Mulholland

¹ California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed June 24, 2019.

² Mobility Plan 2035, Map A3—West Subarea.

Place prominent ridges. Therefore, the Project would not substantially damage scenic resources within a state scenic highway. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in an urbanized area.³ As such this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

With regard to zoning, as discussed in Section 3, Project Description, of this Subsequent MND, the Project Site is zoned by the Los Angeles Municipal Code (LAMC) as RE-15-1-H (Residential Estate, Height District 1). In accordance with the LAMC, educational uses are permitted under the RE zone with a Conditional Use Permit. Curtis School operates under the Existing CUP, which establishes specific conditions for the Project Site. As detailed in Section, 3, Project Description, the Project includes the removal of some existing buildings; the reconfiguration, rehabilitation, and expansion of existing educational facilities; construction of new buildings; redefinition of the existing open space and gardens; and the reconfiguration of existing parking lots and athletic fields. The proposed improvements are intended to modernize the campus and reconfigure aging facilities to allow Curtis School to incorporate current teaching methods, techniques, and technologies by creating specialty classroom spaces (e.g., science and art) and providing separate athletic facilities (e.g., gym and athletic building). In addition, as part of the Project, the Existing CUP would be modified by way of a Plan Approval to include the Project. The Project would also be designed to be compatible with the existing school facilities and surrounding uses. Overall, the Project Site would continue to operate as an educational use with a CUP. As such, the Project would not conflict with applicable zoning governing scenic quality.

With regard to the City's regulations governing scenic quality, a number of local land use plans applicable to the Project Site also include policies governing scenic quality, including the Citywide General Plan Framework Element, the Encino–Tarzana Community Plan, the Mulholland Scenic Parkway Specific Plan, the Citywide Urban Design Guidelines, and the City of Los Angeles Walkability Checklist. These plans and the Project's consistency with applicable goals, objectives, and policies from these plans is provided below.

Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. The following objectives and policies from the Citywide General Plan Framework Element govern scenic quality and are applicable to the Project:

³ Pursuant to Public Resources Code Section 21071, an "urbanized area" can be defined as an incorporated city that has a population of at least 100,000 persons. The Project Site is located within the City of Los Angeles, which is an incorporated city with a population well over 100,000 persons.

- **Policy 3.2.4:** Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.
- **Objective 3.5:** Ensure that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development.
- **Policy 3.5.2:** Require that new development in single-family neighborhoods maintains its predominant and distinguishing characteristics such as property setbacks and building scale.
- **Objective 4.3:** Conserve scale and character of residential neighborhoods.

As discussed in Section 3, Project Description, of this Subsequent MND, the Project Site is located in the Santa Monica Mountains in an area that is developed with residential and educational uses. Land uses surrounding the Project Site include single-family residences to the north, the Milken Community Middle School and High School to the south and west, respectively, and the I-405 Freeway to the east. Additional educational facilities are located farther to the west along Mulholland Drive, including Saperstein Middle School and Berkeley Hall School. The relatively steep topography within the perimeter of the Project Site generally provides a visual and physical barrier between the Project Site and the residential and educational uses to the north and south.

As detailed in Section 3, Project Description, the Project proposes the removal of approximately 23,010 square feet of existing school facilities within the Curtis School campus and the addition of approximately 82,940 square feet of new school facilities, including the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Gymnasium Building, and a new Commons Building. Maximum building heights would range from 16 feet for new and expanded classrooms and up to 40 feet for the proposed Commons Building and Performing Arts Building. The Gymnasium Building would be approximately 37 feet in height. The Project would also reconfigure the surface parking area and the athletic fields to eliminate the conflict between students and cars when accessing the athletic fields.

The Project modifies an existing educational facility operating at the Project Site. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site. In addition, as the Project Site's general vicinity is already developed with several educational institutions, expanding and upgrading the property's educational facilities would not be out of character with the immediate area. As previously noted above, the heights of the new and expanded buildings would range from 16 feet up to 40 feet and would be similar in scale, massing, and height relative to existing facilities. The Project's proposed maximum height of 40 feet would not create view blockages from the adjacent Mulholland Drive since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site, which provides a visual and physical barrier between the residential and educational uses to the north and south. In addition, while the School proposes a Specific Plan exception to allow the proposed 37-foot-high Gymnasium Building to exceed the permissible height of 30 feet for an upslope lot within the Inner Corridor, as shown in Figure 5 on page 24, the approximately seven-foot height increase would also not create view blockages from the adjacent Mulholland Drive. As shown in Figure 5, the proposed

Gymnasium Building would be largely obscured from view by existing mature trees and other existing landscaping along Mulholland Drive with only a small portion of the Gymnasium Building visible from adjacent Mulholland Drive. The existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive. Overall, the Project would be compatible with existing development within and surrounding the Project Site.

Encino–Tarzana Community Plan

The Encino–Tarzana Community Plan is intended to promote an arrangement of land uses, streets, and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community. The Community Plan is also intended to guide development in order to create a healthful and pleasant environment. Goals, objectives, policies and programs are created to meet the existing and future needs and desires of the community. In addition, the Community Plan contains an Urban Design Chapter that includes policies to establish the minimum level of design that shall be observed in multiple residential and commercial projects within the Community Plan area. The policies in the Urban Design Chapter also address design issues for parking and landscaping. As set forth in the Urban Design Chapter, the goal of the design policies and standards presented therein are to ensure that residential and commercial projects and public spaces and rights-of-way incorporate specific elements of good design in order to promote a stable and pleasant environment. The following objective and policies provided in the Encino–Tarzana Community Plan related to scenic quality are applicable to the Project:

- **Policy 1-1.2:** Protect existing single-family residential neighborhoods from new, out-of-scale development.
- **Policy 1-1.4:** Protect the quality of the residential environment through attention to the appearance of communities, including attention to building and site design.
- **Objective 1-3:** To preserve and enhance the varied and distinct residential character and integrity in existing single- and multi-family neighborhoods.
- **Policy 1-3.1:** Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.
- **Policy 1-3.3:** Preserve existing views in hillside areas.
- **Policy 2-1.3:** Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development.
- **Policy 2-4.2:** Preserve community character, scale and architectural diversity.

As discussed above, the new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site. In addition, as the Project Site's general vicinity is already developed with several educational institutions, expanding and upgrading the property's educational facilities would not be out of character with the immediate area. In addition, the Project's proposed maximum height of 40 feet would not create view blockages from the adjacent Mulholland Drive

since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site, which provides a visual and physical barrier between the residential and educational uses to the north and south. Specifically, as shown in Figure 5 on page 24, the proposed Gymnasium Building would be largely obscured from view by existing mature trees and other existing landscaping along Mulholland Drive with only a small portion of the Gymnasium Building visible from adjacent Mulholland Drive. The existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive. Additionally, the proposed grading required for relocation of the athletic fields and parking would be designed to avoid impacts to the nearby prominent ridge as much as feasible and would not alter the nearby ridge's height or that portion visible from adjacent Mulholland Drive. Overall, the Project would be compatible with existing development within and surrounding the Project Site and would preserve the existing community character and scale.

Mulholland Scenic Parkway Specific Plan

The Project Site is also located within the boundaries of the Mulholland Scenic Parkway Specific Plan (the Specific Plan). The Specific Plan designates areas along the Mulholland Drive right-of-way within the Project Site's general vicinity as being within the Institutional Use Corridor.⁴ As defined by the Specific Plan, the Project Site is located within both the Inner Corridor and the Outer Corridor.^{5,6} The Specific Plan expressly allows educational institutions, provided they are located within the Institutional Use Corridor, which, in regards to the Project Site, is substantially the same as the Inner Corridor.

An analysis of the Project's consistency with applicable design and preservation guidelines of the Mulholland Scenic Parkway Specific Plan is provided in Table 2 on page 30. As shown therein, the Project would be anticipated to be consistent with the design and preservation guidelines of the Mulholland Scenic Parkway Specific Plan. In addition, in accordance with City requirements, proposed Project buildings would be reviewed by the Design Review Board to ensure the Project's consistency with the design and preservation guidelines of the Mulholland Scenic Parkway Specific Plan.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As discussed below, the Project would not conflict with the relevant Citywide Design Guidelines governing scenic quality.

⁴ This area is defined as the area parallel to and 500 feet northerly and 500 feet southerly of the Mulholland Drive right-of-way beginning on the west at the intersection of Mulholland Drive and the Centerline of Corda Drive and terminating on the east at the west line of the San Diego Freeway. Also, an area parallel to and 500 feet southerly of Mulholland Drive right-of-way beginning on the west at the east line of the San Diego Freeway and terminating on the east at a line that is parallel to and 400 feet westerly of the centerline of Roscomare Road.

⁵ The Inner Corridor is defined as the Mulholland Scenic Parkway right-of-way plus the additional area which extends 500 feet outwards from the outermost boundaries of the right-of-way.

⁶ The Outer Corridor is defined as the area which lies between the Inner Corridor's outermost boundary and 0.5 mile outward from the right-of-way

Table 2
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

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| <p>Objective 1.1: Design projects to minimize the visibility of the project as seen from Mulholland Drive.</p> | <p>Consistent. The existing hillside creates a natural berm around the Project Site and renders the majority of the School buildings not visible from Mulholland Drive.</p> |
| <p>Guideline 1: Natural Topography. Minimize the amount of grading and the use of retaining walls. Design structures and grading to fit the natural topography and existing conditions of the site.</p> | <p>Consistent. The existing upper field was created by import of soil. This engineered fill is sloped at one to one, a 45-degree angle towards the central campus. The current code requirements for engineered fill are one to two, a 30-degree angle. The Project would include removal of a portion of the previously imported soil to bring the upper field area to match the level of the campus buildings. The remaining area would be terraced utilizing landscaped slopes and retaining walls, to fit into the natural topography and to create parking levels.</p> |
| <p>Guideline 2: Sloping Site Profile: Where a building is situated on a slope greater than 25 percent, the building should utilize a stepped profile.</p> | <p>Consistent. No existing or new buildings are located on slopes greater than 25 percent.</p> |
| <p>Guideline 3: Silhouetting. Structures on a slope of ridges should be designed and sited so they are not skylighted or silhouetted against the sky.</p> | <p>Consistent. The new buildings would be built in the flat area of the Project Site, with the natural hillside visible behind the building when viewed from Mulholland Drive. No existing or new structures would be skylighted or silhouetted against the sky.</p> |
| <p>Guideline 4: Site Drainage. Runoff should be dispersed on the project site or diverted to a drainage facility.</p> | <p>Consistent. The existing drainage is diverted to a drainage facility. The existing site drainage system would be retained and expanded to support proposed improvements.</p> |
| <p>Guideline 5: Site Permeability. The total non-permeable surfaces should be minimized and not exceed 50 percent.</p> | <p>Consistent. The proposed non-permeable surfaces would be less than 50 percent. Approximately 65 percent of the Project Site would remain permeable with only 35 percent as non-permeable surface. These non-permeable surfaces include existing roads and parking, buildings and pathways. The extent of non-permeable surfaces would be minimized by relocating parking closer to the roadway and by proposing new two-story buildings to reduce the overall building footprint.</p> |
| <p>Guideline 6: Site Fencing. Fences and walls should not obstruct the right of way or views from Mulholland.</p> | <p>Consistent. The existing black chain link fence around the perimeter of the Project Site would not be changed. This fence extends along the upper athletic field (parallel to Mulholland Drive), to the perimeter east, north and west sides of the Project Site. This existing perimeter fence cannot be seen from Mulholland Drive and does not obstruct the right-of-way or views from Mulholland Drive.</p> |
| <p>Guideline 7: Additional On-site Parking. Where additional on-site parking is required, it should be located within a garage or covered carport.</p> | <p>Consistent. Additional surface parking would be provided as part of the Project but would be hidden from view by the existing hillside along Mulholland Drive. The relocated parking areas are designed as open terraced surface parking with landscaped areas between parking rows and surrounding the perimeter.</p> |
| <p>Guideline 9: Site Grading. Grading and structures should be designed to fit the project to the natural topography and existing site conditions, rather than altering the site to fit the project. The plan should minimize grading and preserve the existing topographic features. Grading should not extend into the right of way of Mulholland Drive.</p> <p>Grading limits. The Specific Plan limits the</p> | <p>Consistent. The Specific Plan limits the maximum quantity of grading to one cubic yard per four square feet of site area. The Project Site area is approximately 27 acres or 1,176,000 square feet, which would permit 294,000 cubic yards of grading. Approximately 115,229 cubic yards of grading and 75,700 cubic yards of export would be required by the Project. Most of the grading material would be removed from the Project Site. The proposed grading at the upper field and surface parking lot relocation would not be seen from Mulholland Drive and would</p> |

Table 2 (Continued)
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

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| maximum quantity of grading that can be approved without a Specific Plan exception. Proposed grading projects may be disapproved if the amount of design impacts the scenic resources of Mulholland Drive is incompatible with the natural contours or is incompatible with the Parkway environment. | be compatible with the natural contours of the ridge line. In addition, grading which is required along the southeast portion of the Project Site, around the relocated baseball field, would also not be visible from Mulholland Drive and would be compatible with the natural contours of the ridge line. All proposed graded slopes would be graded in accordance with the provisions of the Department of City Planning's Landform Grading Manual. |
| Guideline 11: Landform grading. In order to create slopes that reflect as closely as possible to the surrounding natural hills, graded hillsides and should have a variety of slope ratios, should not exceed a ratio of 2:1 and should transition to the natural slope in a manner that produces a natural appearance. | Consistent. The grading proposed for the surface parking is limited to portions of the upper parking level and areas surrounding the proposed Performing Arts Building. The new slopes would not exceed a ratio of 2:1 and would transition into the natural slope. |
| Guideline 12: Trees. Oak trees and other native tree species have special protection and should be preserved. | Consistent. As discussed in the Biological Resources Assessment included in Appendix 1 of this Subsequent MND, there are 17 protected southern California black walnut trees in the Biological Study Area that would be subject to the City's Protected Tree Ordinance. These trees would not require removal during construction of the Project. As such, there would be no direct impact to these trees. In addition, potential indirect impacts to southern California black walnut trees that could occur during construction would be reduced with implementation of Mitigation Measure BIO-MM-1 provided below. |
| Guideline 13: Wildlife. Projects that are near parks and wildlife corridors should be sensitive to preserving wildlife habitats and the ecology of the Scenic Parkway. Fencing should be placed to not interfere with wildlife movement. | Consistent. The Project would not change fencing nor would it impact existing wildlife corridors. |
| Guideline 14: Natural drainage patterns. Natural drainage patterns should not be obstructed or significantly altered as a result of grading. | Consistent. The existing Project Site was previously graded with open concrete culverts. The Project would not significantly alter this drainage pattern. |
| Guideline 15: Streams. Streams should be protected. | Consistent. As discussed in the Biological Resources Assessment included in Appendix 1 of this Subsequent MND, there is one V-ditch in the Biological Study Area that has a definable bed and bank and is adjacent to a California Walnut Grove community (which is considered a stream associated riparian corridor). No work would be conducted within or adjacent to the concrete V-ditch adjacent to the California Walnut Grove. Therefore, no significant impacts to jurisdictional resources would occur. |
| Guideline 16: Parkland. Projects near parklands are to be carefully reviewed. | Consistent. The Project Site is not located adjacent to public parklands. |
| Guideline 17: Visibility Study. To determine project visibility from Mulholland Drive, all lines of sight from Mulholland Drive towards the project within a ¾ mile radius should be included in the visibility study. | Consistent. As discussed above, the majority of the Project Site is not visible from adjacent Mulholland Drive or from across the I-405 Freeway when looking west from Longbow Drive and Scadlock Lane, as shown in the photos included in Figure 5 on page 24. As specifically illustrated therein, the majority of the buildings are hidden from view behind the trees. A Visibility Study for the Project was not required as the Project is upslope. However, a Visibility Study was completed and is included as |

Table 2 (Continued)
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

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| | Appendix 2 of this Subsequent MND. |
| Guideline 18: Viewshed protection. Projects located within the Inner Corridor and visible from Mulholland Drive are not permitted to extend into the viewshed. | Consistent. The Project Site does not extend into the viewshed from Mulholland Drive. |
| Guideline 19: Viewshed analysis. A viewshed analysis should be prepared for any project, whether upslope or downslope, that is located within the inner corridor and visible from Mulholland Drive. | Consistent. The Project Site is not directly visible from Mulholland Drive, along the perimeter of the Project Site boundary. In addition, Project structures would primarily be located within the Outer Corridor and thus would be outside the Inner Corridor, as defined in the Specific Plan. |
| Objective 1.5: Limit unnecessary access to and construction within the Mulholland Drive right-of-way. Guideline 20: Right of way Construction. Placement of structures, walls, fences, light fixtures, trees, plants or other landscaping and irrigation systems in the right of way of Mulholland should be avoided. | Consistent. No structures, walls, or fences are planned within the Mulholland Drive right-of-way. |
| Guidelines 21: Core Trail. Design projects to provide for future placement and use of the Core trail along the Mulholland right-of-way. | Consistent. The Core Trail is not impacted by the Project. |
| Guideline 22: Right of way grading. Existing slopes adjoining the roadway of Mulholland Drive should not be graded. | Consistent. The existing slopes along the Mulholland Drive right-of-way are not proposed for grading. |
| Guideline 23: Right of way landscaping. Preserve and maintain existing native trees and plants. | Consistent. The existing grading and landscaping along the right-of-way are being retained. |
| Guideline 24: Entry gateways. Gateways and entryways should not penetrate the viewshed and should be compatible in design and appearance with structures in the vicinity. | Consistent. The existing entry gateway does not penetrate the viewshed. This existing entry will be retained with some minor changes proposed to the site walls. This redesign of the entry walls would be compatible with the structures in the vicinity. |
| Guideline 25: Driveways. Design driveways so that they do not enter or intersect Mulholland Drive if other options are available. | Consistent. The existing entrance to the Curtis School campus intersects Mulholland Drive at Walt Disney way. |
| Guideline 26: Obstructions. Provide adequate visibility and site distance for oncoming traffic where any driveway meets the road. | Consistent. The existing entrance includes a traffic signal. The improvements to the entrance walls would not impact visibility. |
| Guideline 27: Dirt Mulholland. It is recognized that the unpaved portion of Mulholland Drive is considered a unique feature. | Consistent. The existing dirt area alongside Mulholland Drive would not be changed. |
| <p>Source: <i>Curtis School Master Plan analysis prepared by EEK, 2010; Eyestone Environmental, 2021.</i></p> | |

Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all

As discussed in Section 3, Project Description, of this Subsequent MND, upon implementation of the Project, on-site pedestrian circulation would be improved by providing additional landscaped walkways

and eliminating the pedestrian-vehicular conflicts associated with students crossing the existing surface parking lots to access the athletic fields.

Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience

Primary vehicular access to the Project Site would be unchanged and would continue to be from Mulholland Drive. As noted above, with implementation of the Project, on-site pedestrian circulation would be improved by eliminating the pedestrian-vehicular conflicts associated with students crossing the existing surface parking lots to access the athletic fields.

Guideline 3: Design projects to actively engage with streets and public space and maintain human scale

The Project Site is not located along public streets where streetscape enhancements could be implemented. As previously discussed, the Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site.

Guideline 4: Organize and shape projects to recognize and respect surrounding context

The Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site. In addition, as the Project Site's general vicinity is already developed with several educational institutions, expanding and upgrading the property's educational facilities would not be out of character with the immediate area. The Project's proposed maximum height of 40 feet also would not create view blockages from the adjacent Mulholland Drive since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site, which provides a visual and physical barrier between the residential and educational uses to the north and south. The existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive.

Guideline 5: Express a clear and coherent architectural idea

The Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site.

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The Project Site is not located along public streets where streetscape enhancements could be implemented. As previously discussed, the Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site.

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The Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site. In addition, as the Project Site's general vicinity is already developed with several educational institutions, expanding and upgrading the property's educational facilities would not be out of character with the immediate area. The Project's proposed maximum height of 40 feet also would not create view blockages from the adjacent Mulholland Drive since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site, which provides a visual and physical barrier between the residential and educational uses to the north and south. The existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive.

Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience

As previously discussed, the Project Site is not located along public streets where streetscape enhancements could be implemented. However, with implementation of the Project, on-site pedestrian circulation would be improved by eliminating the pedestrian-vehicular conflicts associated with students crossing the existing surface parking lots to access the athletic fields. In addition, as part of the Project, new landscaping, landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors. Opportunities for outdoor classroom areas and learning opportunities that are engaged with the landscape would also be provided.

Guideline 7: Carefully arrange design elements and uses to protect site users

With implementation of the Project, on-site pedestrian circulation would be improved by eliminating the pedestrian-vehicular conflicts associated with students crossing the existing surface parking lots to access the athletic fields. In addition, as part of the Project, new landscaping, landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors.

Guideline 8: Protect the site's natural resources and features

As discussed above, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site. In addition, the Project's proposed maximum height of 40 feet would not create view blockages from the adjacent Mulholland Drive since the majority of the Project Site is currently not visible from the adjacent Mulholland Drive due to the relatively steep topography within the perimeter of the Project Site, which provides a visual and physical barrier between the residential and educational uses to the north and south. Specifically, the proposed Gymnasium Building would be largely obscured from view by existing mature trees and other existing landscaping along Mulholland Drive with only a small portion of the Gymnasium Building visible from adjacent Mulholland Drive. The existing mature trees, other existing vegetation, and topography would continue to obscure the majority of the Project Site and associated structures from the adjacent Mulholland Drive. Additionally, the proposed grading required for relocation of the athletic fields and parking would be designed to avoid impacts to the nearby prominent ridge as much as feasible and would not alter the nearby ridge's height or that portion visible from adjacent Mulholland Drive. Additionally, as discussed in the Biological Resources Assessment included in Appendix 1 of this Subsequent MND, the 17 protected southern California black walnut trees in the Biological Study Area that would be subject to the City's Protected Tree Ordinance would not require removal during construction of the Project. As such, there would be no direct impact to these trees. Potential indirect impacts to southern California black walnut trees that could occur during construction would be reduced with implementation of Mitigation Measure BIO-MM-1 provided below.

Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users

The Project would be constructed to incorporate environmentally sustainable building features and construction protocols required by the Los Angeles Green Building Code and CALGreen. These standards would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The Project would be designed to meet the requirements for the U.S. Green Building Council's (USGBC) Leadership in Energy Efficiency and Design (LEED) Silver or equivalent.

Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat

The Project has been designed to minimize the extent of non-permeable surfaces by consolidating the three parking areas currently on-site into one parking area while also locating the new parking area closer to the main entrance at Walt Disney Drive in order to reduce the need for additional roadway area (non-permeable area). Upon completion of the Project, the majority of the campus would remain

permeable with approximately 65 percent as permeable surfaces and only approximately 35 percent as impervious surfaces. Surface water runoff from the Project Site would continue to be directed into the City's storm drain system in accordance with regulatory requirements. In accordance with requirements of the City's Low Impact Development Ordinance, BMPs would be implemented throughout the operational life of the Project to capture stormwater.

City Walkability Checklist

The City of Los Angeles Walkability Checklist Guidance for Entitlement Review (Walkability Checklist) is part of a proactive implementation program for the urban design principles contained in the Urban Form and Neighborhood Design Chapter of the General Plan Framework. City Planning Department staff use the Walkability Checklist in evaluating a project's entitlement applications and in making findings of conformance with the policies and objectives of the General Plan and the local community plan. The City Planning Commission adopted the Walkability Checklist in 2007 and directed that it be applied to all projects seeking discretionary approval for new construction. The final Walkability Checklist was completed in November 2008.⁷

The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. As stated within the Walkability Checklist, while each of the implementation strategies should be considered for a project, not all will be appropriate for every project, and each project will involve a unique approach. The Walkability Checklist is tailored primarily for the new construction of residential and commercial mixed-use projects. The Walkability Checklist addresses the following topics, each of which is discussed further below, as applicable: sidewalks; crosswalks/street crossings; on-street parking; utilities; building orientation; off-street parking and driveways; on-site landscaping; building façade; and building signage and lighting.

The primary objectives defined for sidewalks address facilitating pedestrian movement and enriching the quality of the public realm by providing appropriate connections and street furnishings in the public right-of-way. The Project would be implemented within an existing school and would not include public sidewalks. However, the Project would include designated walkways for students, staff, and visitors to access the new buildings and to access the campus from the parking lot. Recommended implementation strategies that would be incorporated into the Project include creating a continuous and predominantly straight sidewalk (walkway) and creating a buffer between pedestrians and moving vehicles.

The Walkability Checklist strategies regarding crosswalks and street crossings do not apply to the Project because the Project does not include crosswalks or street crossings. In addition, the Walkability Checklist strategies regarding on-street parking do not apply to the Project because sufficient off-street parking would be provided as part of the Project.

The objective of the utilities section of the Walkability Checklist is to minimize the disruption of views and visual pollution created by utility lines and equipment. Existing utilities serving the Curtis School would be extended to serve the proposed buildings, with no new over ground utilities proposed for the Project, which would minimize the visual pollution created by new infrastructure.

⁷ City of Los Angeles Department of City Planning, Walkability Checklist Guidance for Entitlement Review, November 2008.

The objective of the building orientation section of the Walkability Checklist is to use the relationship between buildings and streets to improve neighborhood character and the pedestrian environment. The Project would not include any buildings along a street.

In terms of off-street parking and driveways, the primary objective of the Walkability Checklist is to ensure pedestrian safety. Recommended implementation strategies that would be incorporated into the Project include maintaining the continuity of the sidewalk (walkway); accommodating vehicle access to and from the Project Site with as few driveways as possible; and illuminating all parking areas and pedestrian walkways.

The Walkability Checklist also calls for the use of on-site landscaping to contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way. As part of the Project, new landscaping, landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors. Opportunities for outdoor classroom areas and learning opportunities that are engaged with the landscape would also be provided.

The Walkability Checklist objective related to building façades is to create/reinforce neighborhood identity and a richer pedestrian environment. The Project proposes the reconfiguration, rehabilitation, and expansion of existing educational facilities, construction of new buildings, redefinition of the existing open space and gardens, and the reconfiguration of parking lots and athletic fields. The Project specifically proposes the removal of approximately 23,010 square feet of existing school facilities and the addition of approximately 82,940 square feet of new school facilities including, but not limited to, the expansion of existing structures, a new Classroom Building, a new Science Building, a new Performing Arts Building, a new Commons Building, and a new Gymnasium Building. In addition, through the creation of open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors. Recommended implementation strategies that would be incorporated into the Project include the use of different textures, colors, materials, and distinctive architectural features that add visual interest as well as adding scale and interest to the building facade by articulated massing.

In addition, as intended in the Walkability Checklist, building signage and lighting would be designed to strengthen the pedestrian experience, neighborhood identity and visual coherence. Project signage and lighting would be designed to achieve the following in support of the Walkability Checklist: including signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance; providing adequate lighting levels to safely light pedestrian paths; utilizing adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage; and using fixtures that are “dark sky” compliant.

Based on the Project elements described and the analysis herein, the Project would support the applicable Walkability Checklist objectives and implement relevant strategies. As such, the Project would be consistent with relevant aspects of the Walkability Checklist governing scenic quality.

Conclusion

As evaluated above, the Project would be designed to be compatible with the setting of the Project Site and surrounding uses. Therefore, the Project would not conflict with zoning and other regulations governing scenic quality, and impacts would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The area surrounding the Project Site is developed with institutional and residential uses. In addition, the I-405 Freeway is adjacent to the Project Site to the east. Thus, sources of lighting in the vicinity of the Project Site are limited to street lighting, interior lighting, limited ground's lighting and lighting from vehicles along Mulholland Drive and the I-405. Necessary lighting installed as part of the proposed improvements would be designed to be low-level and would be shielded and directed away from off-site areas including the residential to the north. Landscape lighting would be downward facing and emit low illumination. Lighting on the existing athletic fields is currently not provided and would not be installed on the relocated athletic fields proposed as part of the Project. Also, consistent with School operations, lighting from campus buildings at nighttime would not be considerable since nighttime classes are not offered. Therefore, no major sources of lighting from the athletic fields or buildings would be emitted from the campus at nighttime. In addition, as with existing conditions, lighting from within the Project Site associated with the Project would be further shielded from off-site areas by the existing ridgelines within the Project Site and ample landscaping along the Project Site's perimeter near the I-405 Freeway. Therefore, the Project would not result in a substantial change in ambient illumination levels as a result of Project sources. Additionally, the Project would generally incorporate natural colors and non-reflecting materials and therefore would not produce substantial amounts of glare.

As evaluated above, Project lighting would be designed to be compatible with the setting of the Project Site and surrounding uses. Therefore, the Project would not create a new source of substantial light and glare that could adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Mitigation Measures

As provided above, the Project would not result in significant impacts to aesthetics. Therefore, no mitigation measures are required.

Conclusion

The Original EIR identified an unavoidable adverse effect associated with the change to the aesthetic condition from alteration of the topography for development of the School. The Original EIR also evaluated view changes from lowering of a ridge line. With regard to lighting, the Original EIR concluded a less-than-significant impact. As analyzed above, the Project would not result in new aesthetics impacts when compared to the aesthetics impacts set forth in the Original EIR and MND.

II. AGRICULTURE AND FORESTRY RESOURCES

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

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

No Impact. The Project Site is fully developed with existing educational buildings, athletic facilities, parking, headmaster's house, landscaped areas, and support facilities (i.e., guard house) within an area that is surrounded by single-family residences to the north, several other institutional uses to the south, east, and west, and the I-405 Freeway to the east. No agricultural uses or operations currently occur on the Project Site or within the Project vicinity. In addition, the Project Site and surrounding area are not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuant to the

Farmland Mapping and Monitoring Program of the California Department of Conservation. As such, the Project would not convert farmland to non-agricultural use. No impacts would occur, and no mitigation measures would be required.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project Site is zoned as RE-15-1-H (Residential Estate, Height District 1) pursuant to the Los Angeles Municipal Code (LAMC). The Project Site is not zoned for agricultural land uses and is not subject to a Williamson Act Contract. Additionally, no agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act Contract. Therefore, the Project would not conflict with agricultural zoning or a Williamson Act Contract. No impacts to agricultural zoned lands or lands subject to the Williamson Act would occur and no mitigation measures would be required.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. As described above in Checklist Question II.b, the Project Site is zoned as RE-15-1-H (Residential Estate, Height District 1). No forest land or timberland zoning is present within the Project Site or in the surrounding area. Therefore, the Project would not conflict with existing zoning for forest land or timberland. No impacts to forest land or timberland would occur and no mitigation measures would be required.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed above in Checklist Question II.c, no forest land uses exist on the Project Site or in the Project vicinity, nor is the Project Site or the Project vicinity zoned for forest use. Thus, the Project would not involve the conversion of forest land to non-forest uses. No impacts to forest land or uses would occur and no mitigation measures would be required.

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

No Impact. As discussed above in Checklist Questions II.a and II.b, no agricultural uses exist on the Project Site or in the Project vicinity, nor is the Project Site or the Project vicinity zoned for agricultural use. Thus, the Project would not involve the conversion of farmland to non-agricultural uses. No impacts to agricultural land or uses would occur no mitigation measures would be required.

Mitigation Measures

As provided above, the Project would not result in impacts to agriculture and forestry resources. Therefore, no mitigation measures are required.

Conclusion

Similar to the analysis of the Project's impacts, the Original EIR and MND concluded no impact with regard to agriculture and forestry resources. Therefore, the Project would not result in new impacts to agriculture and forestry resources when compared to the impacts set forth in the Original EIR and MND.

III. AIR QUALITY

Where available, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin). The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone, PM₁₀, and PM_{2.5}). As such, the Project would be subject to the SCAQMD's 2016 Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.⁸ With regard to future growth, SCAG has prepared the 2016–2040

⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. The 2016–2040 RTP/SCS growth projections are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP.

Because the Project is consistent with the land use designations in the General Plan of the City of Los Angeles, and more specifically, the Encino–Tarzana Community Plan, as discussed in further detail below under Checklist Section XI, Land Use and Planning, the Project is also considered consistent with the region’s AQMP. In addition, as discussed below, Project implementation would not exceed any ambient air quality standards or thresholds. Therefore, the Project would not conflict with or obstruct implementation of the SCAQMD’s AQMP. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD Handbook.⁹

Construction

Construction of the Project has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition, site preparation, and construction activities. Mobile source emissions, primarily particulate matter (PM) and nitrogen oxides (NO_x) would result from the use of construction equipment such as loaders, cranes, and haul trucks. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

As discussed in Section 3, Project Description, of this Subsequent MND, the Project is a master plan development for the Curtis School intended to establish the maximum development that can occur on the School over the next two decades. Accordingly, buildout of the Project is anticipated to occur in several phases. The number of phases and amount of development within each phase would be governed by the funding available to Curtis School at a certain time. For purposes of this analysis and to evaluate a

⁹ South Coast Air Quality Management District. Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html.

conservative and reasonable development scenario, the proposed improvements are assumed to be implemented in two main phases. No overlap is anticipated between the phases. This analysis assumes that Phase I would include the construction of the 18,300-square-foot Performing Arts Building over a 14-month construction period. Phase I construction would require approximately 10,140 square feet of demolition, 1.6 acres of grading activities, and approximately 9,800 cubic yards of export. Phase II would include the balance of the proposed improvements, including the addition of approximately 59,000 square feet of new construction and swapping the location of the existing athletic fields and the parking lot. Phase II construction is anticipated to occur over a 14-month period and require approximately 6 acres of grading activities with approximately 65,900 cubic yards of export.

For the purpose of identifying potential construction-related air quality impacts, this analysis assumed that Phase II would occur in the minimum timeframe (no sub-phasing) and the earliest construction year. This approach is conservative in that it evaluates impacts from Phase II with the maximum daily earth movement, soil disturbance, and use of heavy-duty construction equipment that could occur on a maximum construction day. If construction is delayed or occurs over a longer time period, emissions could be reduced because of: (1) a more modern and cleaner burning construction equipment fleet mix; and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Model results are provided in Appendix 3 of this Subsequent MND. The analysis assumed that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Phase I is presented in Table 3 on page 44, along with the regional significance thresholds for each air pollutant. A summary of unmitigated maximum daily regional emissions for Phase II is presented in Table 4 on page 45, along with the regional significance thresholds for each air pollutant.

As shown in Table 3 and Table 4, maximum unmitigated regional construction emissions would not exceed the thresholds for VOC, NO_x, carbon monoxide (CO), sulfur dioxide (SO_x), PM₁₀, or PM_{2.5}.

Localized Impacts

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate look-up tables and Project-specific modeling, where appropriate.¹⁰ SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

¹⁰ SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

Table 3
Regional and Localized Unmitigated Construction Emissions (Phase I)^a
(pounds per day)

| | VOC | NO _x | CO | SO _x | PM ₁₀ ^b | PM _{2.5} ^b |
|--|-------------|-----------------|----------------|-----------------|-------------------------------|--------------------------------|
| Phase I Regional Emissions | | | | | | |
| Demolition | 5 | 47 | 33 | <1 | 3 | 2 |
| Site Grading | 5 | 67 | 34 | <1 | 6 | 4 |
| Building Foundation | 5 | 41 | 32 | <1 | 3 | 2 |
| Building Erection/Finishing | 8 | 50 | 41 | <1 | 3 | 3 |
| Landscape/Paving | 2 | 19 | 20 | <1 | 1 | 1 |
| Maximum Phase I Regional Emissions | 8 | 67 | 41 | <1 | 6 | 4 |
| Regional Construction Daily Significance Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Over/(Under) | (67) | (33) | (509) | (150) | (144) | (51) |
| Exceed Threshold? | No | No | No | No | No | No |
| Phase I Localized Emissions | | | | | | |
| Demolition | 5 | 45 | 31 | <1 | 3 | 2 |
| Site Grading | 4 | 46 | 28 | <1 | 5 | 3 |
| Building Foundation | 5 | 39 | 30 | <1 | 2 | 2 |
| Building Erection/Finishing | 8 | 48 | 39 | <1 | 3 | 3 |
| Landscape/Paving | 2 | 17 | 18 | <1 | 1 | 1 |
| Maximum Localized Emissions | 8 | 48 | 39 | <1 | 5 | 3 |
| Localized Significance Thresholds ^c | — | 74 | 1,072 | — | 17 | 5 |
| Over/(Under) Threshold | — | (26) | (1,033) | — | (12) | (2) |
| Exceed Threshold? | — | No | No | — | No | No |
| <p>^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix 3 of this Subsequent MND.</p> <p>^b PM₁₀ and PM_{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.</p> <p>^c The SCAQMD Localized Significance Thresholds (LSTs) are based on Source Receptor Area No. 2 (NW Coastal LA) for a 1.7-acre site with a 50-meter receptor distance.</p> <p>Source: Eyestone Environmental, 2021.</p> | | | | | | |

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. For projects that exceed 5 acres, such as the Project during Phase II construction, the 5-acre LST look-up values can be used as a screening tool to

Table 4
Regional and Localized Unmitigated Construction Emissions (Phase II)^a
(pounds per day)

| | VOC | NO _x | CO | SO _x | PM ₁₀ ^b | PM _{2.5} ^b |
|---|-------------|-----------------|----------------|-----------------|-------------------------------|--------------------------------|
| Phase II Regional Emissions | | | | | | |
| Demolition | 7 | 50 | 37 | <1 | 3 | 3 |
| Site Grading | 6 | 97 | 44 | <1 | 8 | 4 |
| Building Foundation | 4 | 40 | 32 | <1 | 2 | 2 |
| Building Erection/Finishing | 13 | 60 | 46 | <1 | 4 | 3 |
| Landscape/Paving | 5 | 52 | 38 | <1 | 3 | 3 |
| Maximum Phase I Regional Emissions | 13 | 97 | 47 | <1 | 8 | 4 |
| Regional Construction Daily Significance Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| Over/(Under) | (62) | (3) | (503) | (150) | (142) | (51) |
| Exceed Threshold? | No | No | No | No | No | No |
| Phase II Localized Emissions | | | | | | |
| Demolition | 5 | 49 | 34 | <1 | 3 | 3 |
| Site Grading | 5 | 55 | 33 | <1 | 5 | 4 |
| Building Foundation | 4 | 37 | 29 | <1 | 2 | 2 |
| Building Erection/Finishing | 13 | 58 | 44 | <1 | 3 | 3 |
| Landscape/Paving | 5 | 50 | 35 | <1 | 2 | 2 |
| Maximum Localized Emissions | 14 | 58 | 44 | <1 | 5 | 4 |
| Localized Significance Thresholds ^c | — | 116 | 1,985 | — | 40 | 8 |
| Over/(Under) Threshold | — | (58) | (1,941) | — | (35) | (4) |
| Exceed Threshold? | — | No | No | — | No | No |
| ^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix 3 of this Subsequent MND. ^b PM ₁₀ and PM _{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression. ^c The SCAQMD Localized Significance Thresholds (LSTs) are based on Source Receptor Area No. 2 (NW Coastal LA) for a 5-acre site with a 50-meter receptor distance. Source: Eyestone Environmental, 2021. | | | | | | |

determine which pollutants require detailed analysis.¹¹ This approach is conservative as it assumes that all on-site emissions would occur within a 5-acre area and therefore over-predicts potential localized impacts (i.e., more pollutant emissions occurring within a smaller area and within closer proximity to potential sensitive receptors). If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling be performed.

¹¹ Telephone Conversation, Ian MacMillan, SCAQMD CEQA Program Supervisor, November 10, 2011.

A conservative estimate of Phase I and Phase II maximum local (on-site) daily emissions for NO_x, PM₁₀, PM_{2.5}, and CO are presented in Table 3 and Table 4 on pages 44 and 45, respectively. Localized construction emissions thresholds, based on the construction site acreage and distance to the closest off-site sensitive receptor, were obtained from the LST look-up tables and are also listed in Table 3 and Table 4. The nearest sensitive receptors to Phase I construction are residential uses located north of Mulholland Place (approximately 50 meters). The nearest sensitive receptors to Phase II construction are educational uses south of Mulholland Drive across from the Project Site (the Milken Community Schools approximately 75 meters). However, this analysis conservatively assumes a 50-meter receptor distance for both phases of construction. As presented in Table 3 and Table 4, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, localized construction emissions resulting from the project would result in a less than significant short-term impact, and no mitigation measures are required.

Operational

The SCAQMD has also established separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term Project operations. While the Project is intended to serve the Curtis School student population with no increase in currently permitted enrollment, a total of approximately 50 additional faculty and staff members could be employed over currently permitted faculty and staff. The increase in square footage of occupied buildings could also result in an increase of emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g. landscape fuel combustion, consumer products, and architectural coatings). Operational emissions related to the increase in vehicular trips and building square footage were computed using the CalEEMod emissions model.

Regional Impacts

As discussed above, the Project would result in an increase in faculty and staff and associated vehicular trips as well as an increase in building space. As such, the Project would result in an increase in emissions from vehicular exhaust and the consumption of fossil fuels for comfort heating. The results of the detailed emissions calculations are provided in Table 5 on page 47, and CalEEMod model output files are presented in Appendix 3 of this Subsequent MND.¹² As indicated therein, the Project would result in a slight increase of criteria pollutant emissions and emissions would be well below the SCAQMD daily significance thresholds for long-term regional operations. Therefore, no impacts associated with regional operational emissions would occur, and no mitigation measures are required.

Localized Impacts

The SCAQMD recommends a hot-spot evaluation of potential localized operational CO impacts when vehicle-to-capacity (V/C) ratios are increased by 2 percent or more at intersections with a level of service (LOS) of D or worse. As described above, approximately 50 additional faculty and staff members could be employed over currently permitted faculty and staff. As discussed in Checklist Section XVII, Transportation, below, the Project would not cause significant traffic impacts on the area roadways and similarly would not result in an increase in volume/capacity ratios by 2 percent or more at intersections

¹² While the buildout year has been extended to 2035, the emissions presented in the operational analysis conservatively reflect 2020. Pollutant emissions would decrease in subsequent years with lower emitting vehicles.

Table 5
Project-Related Operational Emissions^a
(pounds per day)

| Emission Source | VOC | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
|---|-------------|-----------------|--------------|-----------------|------------------|-------------------|
| Project Emissions ^a | | | | | | |
| Area | 1 | <1 | <1 | <1 | <1 | <1 |
| Energy | <1 | <1 | <1 | <1 | <1 | <1 |
| Mobile | 1 | 2 | 5 | <1 | 1 | <1 |
| Total | 2 | 2 | 6 | <1 | 1 | <1 |
| SCAQMD Significance Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| Difference | (53) | (53) | (544) | (150) | (149) | (55) |
| Significant? | No | No | No | No | No | No |
| ^a Worksheets and modeling output files are provided in Appendix 3 of this Subsequent MND. Source: Eyestone Environmental, 2021. | | | | | | |

with a level of service of D or worse. Thus, the Project would not cause any new or exacerbate any existing CO hotspots, and, as a result, no impacts related to localized mobile-source CO emissions would occur and no mitigation measures would be required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD *CEQA Air Quality Handbook*, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e. elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. The nearest sensitive receptors include residential uses north of Mulholland Place and educational uses south and west of Mulholland Drive. It is noted that the Project Site is also considered a sensitive land use.

As described in Checklist Question III.b above, construction and operation of the Project would result in a less than significant impact for both regional and localized air pollution emissions. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. In addition, Project construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust and other specified dust control measures. As such, impacts to off-site sensitive receptors would be less than significant and no mitigation measures would be required.

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The CARB has published and adopted the “*Air Quality and Land Use Handbook: A Community Health Perspective (2005)*,” which provides recommendations regarding the siting of new sensitive land uses near potential

sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). The SCAQMD adopted similar recommendations in their “*Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005)*.” Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources, and the addition of new TAC sources in proximity to existing sensitive land uses.

The Project would not include any new substantial TAC sources as defined in the guidance document. Therefore, the analysis focused on on-site sensitive land uses. Students and staff may be impacted by existing off-site sources of TACs. Based on CARB siting recommendations, sensitive receptors should not be sited within 500 feet of a freeway or similar high traffic roadway (i.e., roads within urbanized areas carrying more than 100,000 vehicles per day), within 50 feet of a typical gasoline station (less than 3.6 million gallons of throughput), or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations.

Potential sources of TACs were identified using the Facility Information Database (FIND) search, which is a resource for discovering SCAQMD permitted sources in the vicinity of the Project Site. In addition, site reconnaissance was conducted to identify potential non-permitted air toxic emitting sources (e.g., freeways). Two TAC sources were located within 0.25 mile from the Project Site. Off-site TAC sources identified include the I-405 Freeway and one diesel emergency generator.¹³ The diesel emergency generator is operated in compliance with SCAQMD Rule 1110.2 and would typically be used one hour a month for routine testing unless a power outage. Thus, the diesel emergency generator would not be considered a substantial source requiring additional analysis.

Regarding the proximity to the I-405 Freeway, all improvements, with the exception of the expansion of existing classroom space by 2,500 square feet and the new Classroom Building of approximately 6,100 square feet, would be located beyond 500 feet of the I-405 Freeway and consistent with SCAQMD’s and CARB’s recommended siting distance for freeways. The expansion of existing classroom space would result in classroom space approximately 15 feet closer to the freeway (i.e., from approximately 450 feet to approximately 435 feet from the freeway) than under the existing condition. However, it is important to note that this is an existing school and that the area of proposed construction is currently accessible to students and staff. With implementation of the proposed improvement, this area would be within an enclosed building rather than open air, resulting in reduced student and staff exposure to diesel particulate from the freeway. The new Classroom Building would result in new classroom space as close as approximately 390 feet from the freeway. However, this area is currently used by students for outdoor recreational activities (e.g., play structure and basketball courts). Thus, with implementation of the proposed improvements, the students in this area would now be within an enclosed building rather than in an outdoor play area with reduced exposure to diesel particulate from the freeway. In addition, as part of the Project, all proposed new or expanded buildings would include heating, ventilation and air conditioning (HVAC) control systems that have a minimum efficiency reporting value (MERV) of 12 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. Furthermore, to minimize exposure to diesel exhaust and the re-entrainment of paved roadway dust, all new or expanded buildings would be designed with inoperable windows facing the freeway and the Project would include landscaping along the property perimeter nearest the freeway with a dense mixture

¹³ SCAQMD Facility ID 144905, Nextel of California, Inc., 16000 Mulholland Drive, Los Angeles, CA 90049.

of shrubs and trees to maximize passive filtration of particulate air contaminants. A building with HVAC equipped with MERV 12 would reduce exposure to particles with an average size from 1.0 to 3.0 microns (range of diesel particulate) between 80 to 89.9 percent.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact. No other emissions, including objectionable odors are anticipated as a result of either construction or operation of the Project. Specifically, construction of the Project would involve the use of conventional building materials typical of construction projects of similar type and size. Any odors that may be generated during construction would be localized and temporary in nature and would not be sufficient to affect a substantial number of people.

With respect to operation of the Project, according to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses. The Project would include the development of school uses. In addition, on-site trash receptacles would be contained, located, and maintained in a manner that promotes odor control, and would not result in substantially adverse odor impacts. Construction and operation of the Project would also comply with SCAQMD Rules 401 and 403 regarding visible emissions violations¹⁴ as well as SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.¹⁵

Based on the above, the Project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people during either construction or operation of the Project, and impacts would be less than significant.

Mitigation Measures

As provided above, the Project would not result in significant impacts to air quality. Therefore, no mitigation measures are required.

Conclusion

As concluded in the Original EIR, short-term construction impacts would occur. Long-term operational impacts were determined to be less than significant in the Original EIR. As evaluated above, the Project

¹⁴ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed March 5, 2018.

¹⁵ SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed March 5, 2018.

would result in less than significant impacts. As such, the Project would not result in new impacts to air quality when compared to the impacts set forth in the Original EIR and MND.

IV. BIOLOGICAL RESOURCES

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

The following analysis is based, in part, on the Biological Resources Assessment prepared by Galvin Preservation, dated July 2021, which is included in Appendix 1 of this Subsequent MND. As provided in the Biological Resources Assessment, the Project's potential impacts to biological resources were considered within the Biological Study Area established for the Project. As shown in Figure 3 of the Biological Resources Assessment, the Biological Study Area encompasses the Curtis School campus up to the property line and an additional 50 feet along the hillside on the east and south sides of the campus.

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

Less Than Significant with Mitigation Incorporated. As detailed in the Biological Resources Assessment, the California Natural Diversity Database (CNDDDB), which is managed and updated monthly by the California Department of Fish and Wildlife (CDFW), was queried for a list of special-status species that have been recorded within or near the Biological Study Area. An official United States Fish and Wildlife Service (USFWS) list of species that are designated as threatened or endangered, received from the USFWS on September 28, 2017 and on February 17, 2021, was also reviewed. The CDFW Biogeographic Information and Observation System (BIOS) Habitat Connectivity Viewer was also reviewed to determine habitat connectivity in the BSA. The entire BSA was also visually surveyed on foot where feasible; the steeper hillside areas were surveyed using binoculars. All vegetation communities and plant and wildlife species within the BSA were inventoried to the extent feasible to verify the presence or absence of protected species.

As described in the Biological Resources Assessment, the footprint of the Curtis School campus was graded between 1979 and 1980 (except for a grove of walnut trees on the southeast slope of the campus), and fill was brought to the site to build up the campus. All trees and vegetation within the Project Site have been planted and there are no naturally occurring vegetation communities on the Project Site, except for the walnut grove that was not removed during grading.

As discussed in the Biological Resources Assessment, three vegetation communities were identified in the Biological Study Area, including Mixed Chaparral/Ornamental, Chaparral, California Walnut Grove, and Ornamental. An additional cover type classification in the Biological Study Area is "Developed."¹⁶ The Mixed Chaparral/Ornamental vegetation community is adjacent to the main developed areas of campus and extends along the hillsides and to the edge of the northern and eastern property line. The Chaparral vegetation community is at the top of the hillsides and extends to the southern and western property line. The Chaparral community provides habitat for many wildlife species, including mammals, birds, reptiles, and insects. The California Walnut Grove community is on the southeast slope of the Project Site, south/below the parking lot, and there is ornamental landscaping between the athletic field and parking lot. The California Walnut Grove community is the only naturally occurring vegetation community within the Biological Study Area.

Based on the Biological Resources Assessment, there is habitat along the undeveloped hillsides of the Curtis School campus that could support common bird, mammal, and reptile species. Because there are large trees and shrubs in the Biological Study Area, there is potential for migratory birds to nest within these areas. Trees and clay roof tiles on campus structures within the Biological Study Area could also provide roosting habitat for bats. In addition, the state candidate Southern California mountain lion may use the adjacent hillsides for local movement and foraging. Wildlife species observed during the biological reconnaissance survey include California scrub-jay, oak titmouse, red-tailed hawk, Anna's hummingbird, American crow, house finch, dark-eye junco, California towhee, Northern mockingbird,

¹⁶ Developed areas are areas where human disturbance has resulted in permanent impacts on natural communities. Developed areas include paved areas, buildings, and other structures. Developed areas within the Biological Study Area include paved parking lots, buildings, and concrete drainage-control structures.

ruby-crowned kinglet, black phoebe, western fence lizard, lesser goldfinch, and praying mantis. Other signs of wildlife observed during the survey include gopher burrows along the hillside and rabbit scat and deer scat in two locations.

According to the Biological Resources Assessment, because there is chaparral habitat onsite, there is a low potential for 20 special-status plant species to be within the Chaparral community along the tops of the hillsides. In addition, there are 17 protected southern California black walnut trees present in the Biological Study Area subject to the City's Tree Protection Ordinance. As further discussed in the Biological Resources Assessment, due to the undeveloped hillsides with mixed chaparral vegetation and mature trees in the Biological Study Area, there is a moderate to high potential for seven special-status wildlife species to be within the Biological Study Area, including the Santa Monica shieldback katydid, southern California rufous-crowned sparrow, Costa's hummingbird, rufous hummingbird, western mastiff bat, hoary bat, and the Southern California mountain lion.¹⁷ There is a low potential for 10 other special-status wildlife species to be within the Biological Study Area. The oak titmouse was heard calling in the Biological Study Area during the biological survey and is present within the Biological Study Area.

As provided in the Biological Resources Assessment, the California Walnut Grove community on the southeast slope of the Project Site, south/below the parking lot, is the only naturally occurring vegetation community within the Biological Study Area. The California Walnut Grove community has a State Rank of S3.2, which indicates that these communities are fairly threatened in California and are considered a special-status natural community by CDFW. While the California Walnut Grove community would not be removed as part of the Project and would be outside of the direct Project construction impact area, this California Walnut Grove community could be indirectly impacted from disturbance to the root zone of individual trees within the community if construction activities were conducted adjacent to individual trees. Therefore, the Project could result in a potentially significant indirect impact to a special-status vegetation community during construction. As provided further below, the Project would include implementation of Mitigation Measure BIO-MM-1 to reduce potential indirect impacts to the California Walnut Grove community on the southeast slope of the Project Site, south/below the parking lot. Mitigation Measure BIO-MM-1 would require the installation of a protection barrier around the California Walnut Grove community and would prohibit the storage of materials or supplies within the protection barrier. With implementation of Mitigation Measure BIO-MM-1 provided below, potential indirect impacts to the California Walnut Grove community found within the Biological Study area would be reduced to a less than significant level.

As evaluated in the Biological Resources Assessment, there is a potential for multiple special-status plant species to be within the Chaparral community at the top of the hillsides within the Biological Study Area. However, no construction would occur within this area, and there would be no impact on any special-status plant species that may be present in that area. Similarly, since the existing southern California black walnut trees found within the Biological Study Area would not be removed during construction of the Project, there would be no direct impact to this species. However, potential indirect impacts to southern California black walnut trees could occur during construction, including through disturbance to the root zone as a result of construction activities conducted adjacent to the trees.

¹⁷ On April 16, 2020, the California Fish and Game Commission voted to push for the Southern California and Central Coast mountain lions (*Puma concolor*) to candidacy under the California Endangered Species Act (CESA). There will be a yearlong review to determine if these species should formally be protected under CESA. However, the protections listed under CESA are in place for these populations during the review period (CDFW, 2020).

Therefore, there would be a potentially significant indirect impact to the southern California black walnut trees during construction. As provided further below, the Project would include implementation of Mitigation Measure BIO-MM-1 to reduce potential indirect impacts to the southern California black walnut trees on the southeast slope of the Project Site, south/below the parking lot. Mitigation Measure BIO-MM-1 would require the installation of a protection barrier around the southern California black walnut trees and would prohibit the storage of materials or supplies within the protection barrier. With implementation of Mitigation Measure BIO-MM-1 provided below, potential indirect impacts to the southern California black walnut trees found within the Biological Study area would be reduced to a less than significant level.

With regard to special-status wildlife species, as discussed in the Biological Resources Assessment, there is a potential for several special-status wildlife species to be within the undeveloped hillsides within the Biological Study Area. If present, special-status species would most likely be within the Chaparral community on the undeveloped hillsides where no Project construction would occur. In particular, while the undeveloped hillsides could provide habitat for the Southern California mountain lion, as no construction work would be conducted within this area, direct impacts on this species are not anticipated. However, if special-status wildlife species were in the construction area, special-status wildlife species could be directly impacted if they were to be trampled or destroyed during construction. In addition, noise, vibration, dust, and human activity could result in indirect temporary impacts on special-status wildlife species. For example, construction activities could disturb wildlife to the extent that they may abandon their burrows or avoid foraging in areas near the construction area. In addition, while mountain lions generally hunt and travel between dusk to dawn and construction activities would not be conducted during this time, increased noise, vibration, and human activity during construction hours could potentially result in indirect impacts on the Southern California mountain lion, causing disturbance and altering their movement patterns. Therefore, the Project could result in a potentially significant impact to special-status wildlife species that could be present in the Biological Study Area. As provided further below, the Project would include implementation of Mitigation Measures BIO-MM-2 to BIO-MM-4 to address potentially significant impacts to special-status wildlife species. As detailed below, Mitigation Measures BIO-MM-2 would require that pre-construction surveys be conducted by a qualified biologist no more than 48 hours prior to construction within previously undeveloped areas to determine the presence or absence of wildlife in the construction area. Mitigation Measures BIO-MM-3 would require that construction in areas with trees and vegetation that may provide nesting habitat for birds be reduced to the maximum extent feasible and that trimming and removal of trees and vegetation shall be minimized and performed outside of the bird nesting season (typically February 1 to September 15) to the extent feasible. Mitigation Measures BIO-MM-4 would require that at least 30 days prior to construction, surveys be conducted by a qualified biologist on all roosting habitat within 100 feet of the construction area, to identify the presence of bats and any active or potential bat-roosting cavities. With implementation of Mitigation Measures BIO-MM-2 to BIO-MM-4 provided below, potential impacts to special-status wildlife species would be reduced to a less-than-significant level.

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

Less Than Significant with Mitigation Incorporated. As discussed in the Biological Resources Assessment, no riparian habitats were identified on the Project Site. In addition, as evaluated above, within the Biological Study Area, there is a California Walnut Grove community on the southeast slope of the Project Site, south/below the parking lot. The California Walnut Grove community has a State Rank of

S3.2, which indicates that these communities are fairly threatened in California and are considered a special-status natural community by CDFW. While the California Walnut Grove community would not be removed as part of the Project and would be outside of the direct Project construction impact area, this California Walnut Grove community could be indirectly impacted from disturbance to the root zone of individual trees within the community if construction activities were conducted adjacent to individual trees. Therefore, the Project could result in a potentially significant indirect impact to a special-status vegetation community during construction. As provided further below, the Project would include implementation of Mitigation Measure BIO-MM-1 to reduce potential indirect impacts to the California Walnut Grove community on the southeast slope of the Project Site, south/below the parking lot. Mitigation Measure BIO-MM-1 would require the installation of a protection barrier around the California Walnut Grove community and would prohibit the storage of materials or supplies within the protection barrier. With implementation of Mitigation Measure BIO-MM-1 provided below, potential indirect impacts to the California Walnut Grove community found within the Biological Study area would be reduced to a less than significant level.

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

No Impact. As provided in the Biological Resources Assessment, during construction of the Curtis School campus between 1979 and 1980, the Biological Study Area was graded and scraped to create pads for buildings, parking lots, and other campus amenities. Concrete V-ditches were constructed to collect runoff from the hillsides to prevent erosion. The concrete ditches appear to flow underground and connect to a drainage basin south of the Biological Study Area within California Department of Transportation (Caltrans) property. According to the USFWS National Wetlands Inventory mapper, there are no mapped wetland areas within the Biological Study Area. All concrete V-ditches were dry during the biological survey and no wetland vegetation was observed. According to the Mulholland Scenic Parkway Specific Plan maps, one of the concrete V-ditches at the southern end of the campus is identified as a blue-line stream on USGS maps. A Jurisdictional Resource Evaluation of the Curtis School property was conducted by Compliance Biology in 2010 (refer to Appendix E of this MND). According to the Jurisdictional Resource Evaluation, no streams were observed on the campus; however, because the V-ditch has a definable bed and bank and is adjacent to the California Walnut Grove community (which is considered a stream associated riparian corridor), it was determined during 2010 studies, that CDFW may claim jurisdiction over this area because of the associated riparian corridor (Compliance Biology, 2010). However, construction associated with the Project would not occur within or adjacent to the concrete V-ditch adjacent to the California Walnut Grove at the southern end of the Project Site. Therefore, there would no impact on jurisdictional resources (waterways or associated riparian corridors) and regulatory permits from the CDFW would not be required for the Project.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant With Mitigation Incorporated. Based on the Biological Resources Assessment, wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. The Biological Study Area is surrounded by development, including the I-405 to the east, Miliken Community Middle School and Miliken Community High School to the south and west, respectively, and residential

development to the north. According to the California Department of Fish and Wildlife BIOS Habitat Connectivity Viewer, the Biological Study Area is not within an essential connectivity area. However, immediately adjacent to the Biological Study Area are undeveloped hillsides, and deer scat was observed along the hillsides within the Biological Study Area. In addition, a wildlife camera was observed along the eastern hillside outside of the campus fence line. Therefore, the hillsides outside of the campus boundaries are likely used as travel corridors for local wildlife movement, including potential use by Southern California mountain lions. A previous biological resource assessment conducted for the Project Site (2010 Biological Resources Assessment) identified an important wildlife crossing recognized by the National Park Service as the Skirball Center Drive bridge over the I-405, approximately 0.30 mile south of the Project Site. This area is adjacent to open space on either side of the I-405, and is likely to be used as a regional wildlife movement corridor in the area. There is development (Skirball Cultural Center, Miliken Community High School, and Mulholland Drive) between the open space area and the Biological Study Area. Therefore, the Biological Study Area is not expected to be used for regional wildlife movement, but is used for local wildlife movement in the area.

As discussed in the Biological Resources Assessment, there are mature trees within the Biological Study Area that could provide nesting sites for migratory birds. In addition, trees and buildings within the Biological Study Area could provide roosting habitat for some species of bats. Furthermore, Southern California mountain lions may use the adjacent hillsides for local movement and foraging. Tree removal or building demolition could result in direct impacts on migratory birds and bats if they were nesting or roosting in the trees and buildings to be removed. Noise, vibration, dust, and human activity associated with construction activities could also result in indirect impacts on migratory birds and bats if migratory birds were nesting within 300 feet of the construction area during construction or raptors nesting within 500 feet of the construction area. Specifically, construction activities could disturb breeding birds and could impact fledgling survivorship as well as cause roost abandonment by bats and altering the movement patterns of Southern California mountain lions, potentially resulting in significant impacts. As previously discussed above, with implementation of Mitigation Measures BIO-MM-2 to BIO-MM-4 provided below, potential impacts to migratory species would be reduced to a less than significant level. It is also noted that as part of the Project (Project Design Feature BIO-PDF-1), the existing northern perimeter chain fence would be replaced with an approximately 5-foot-tall fence composed of vertical metal slats.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact. The City of Los Angeles Protected Tree Ordinance regulates the relocation or removal of all California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least four inches in diameter at breast height. These native tree species are defined as protected by the City of Los Angeles. Native trees that have been planted as part of a tree planting program are exempt from the Los Angeles Protected Tree Ordinance and are not considered protected. The Los Angeles Protected Tree Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a two-to-one basis with trees that are of a protected variety. The City also requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of the proposed construction, and mitigation measures pursuant to the removal or replacement thereof.

As discussed above in Checklist Question IV.a, there are 17 protected southern California black walnut trees in the Biological Study Area that would be subject to the City's Protected Tree Ordinance. These trees would not require removal during construction of the Project. As such, there would be no direct impact to these trees. In addition, potential indirect impacts to southern California black walnut trees that could occur during construction would be reduced with implementation of Mitigation Measure BIO-MM-1 provided below.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project would occur on a site that has been previously developed or graded and used for educational and accessory uses for decades. The Project Site does not support any habitat or natural community.^{18,19} Furthermore, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site or immediate vicinity. Therefore, the Project would not have the potential to conflict with any such plan, and no impact would occur.

Project Design Features

The following project design feature would be implemented:

Project Design Feature BIO-PDF-1: The existing northern perimeter chain fence would be replaced with an approximately 5-foot-tall fence composed of vertical metal slats.

Mitigation Measures

The following mitigation measures would be implemented to reduce potential impacts to biological resources:

Mitigation Measure BIO-MM-1: A protection barrier shall be installed around the southern California black walnut trees to be preserved. The barrier shall be constructed of chain-link fencing and shall be placed as far from the base of the trees as possible, at least 0.75 foot per inch of trunk diameter for trees eight to 18 inches diameter breast height (DBH) and 1.25 feet per inch of trunk diameter for trees over 18 inches DBH, beyond the drip-line. The fencing shall be maintained in good repair throughout the duration of the Project and shall not be removed, relocated, or encroached upon without permission from an arborist. No storage of materials or supplies of any kind shall be permitted within the protection barriers.

Mitigation Measure BIO-MM-2: A qualified biologist shall complete pre-construction surveys no more than 48 hours prior to construction within previously undeveloped areas to determine presence or absence of wildlife in the construction area. Surveys shall be repeated if construction activities are suspended for five days or more. If

¹⁸ City of Los Angeles Department of City Planning, ZIMAS, Parcel Profile Report, <http://zimas.lacity.org/>, accessed December 26, 2017.

¹⁹ United States Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed December 26, 2017.

sensitive wildlife species are identified, a no-work buffer shall be installed around the species. The size of the buffer shall be determined by the qualified biologist and will be species-specific. Work shall be suspended until the species leaves the site on their own (i.e., Southern California mountain lion) or is relocated by a qualified biologist to an area of suitable habitat at least 100 feet outside of the construction area. Work will resume only once it has been determined that all sensitive wildlife species have left the site, as determined by the qualified biologist. Best management practices, such as silt fencing, fiber rolls, straw bales, or other measures shall be implemented during construction to minimize dust, dirt, and construction debris from leaving the construction area. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be stabilized using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover, or hydroseeded with vegetative ground cover to reduce dust emissions. Construction would be conducted during daylight hours, and no work shall be conducted at night.

Mitigation Measure BIO-MM-3: Construction in areas with trees and vegetation that may provide nesting habitat for birds shall be reduced to the maximum extent feasible. Trimming and removal of trees and vegetation shall be minimized and performed outside of the bird nesting season (typically February 1 to September 15) to the extent feasible. In the event trimming or removal of trees and vegetation must be conducted during the bird nesting season, nesting bird surveys shall be completed by a qualified biologist no more than 48 hours prior to trimming or clearing activities to determine if nesting birds are within the affected vegetation. Nesting bird surveys shall be repeated if trimming or removal activities are suspended for five days or more. In the event construction is scheduled during bird nesting season, nesting bird surveys shall be completed no more than 48 hours prior to construction to determine if nesting birds and active nests are in or within 500 feet of the construction area. Surveys shall be repeated if construction activities are suspended for five days or more. In the event nesting birds are found within 500 feet of the construction area, appropriate buffers (typically 150 feet for songbirds and 500 feet for raptors) shall be implemented, in coordination with the California Department of Fish and Wildlife, to ensure that nesting birds and active nests are not harmed. No work will be conducted within the buffer area. Buffers shall include fencing or other barriers around the nests to prevent any access to these areas and shall remain in place until birds have fledged and/or the nest is no longer active, as determined by a qualified biologist.

Mitigation Measure BIO-MM-4: At least 30 days prior to construction, surveys shall be conducted by a qualified biologist on all roosting habitat within 100 feet of the construction area, to identify the presence of bats and any active or potential bat-roosting cavities. During the non-breeding and active season (typically October), bats shall be safely evicted from these areas, if feasible, under the direction of a qualified biologist. Once it has been determined that all roosting bats have been safely evicted from roosting cavities, exclusionary devices shall be installed and maintained where appropriate to prevent bats from roosting in these cavities prior to and during construction. Pre-construction bat surveys shall be conducted by a qualified bat specialist no more than seven days prior to the removal of any roosting habitat within the Biological Study Area to determine whether exclusionary measures have been successful and there are no bats within the construction area. A biological monitor shall be onsite during tree and building removal in the event that all bats were not able to be excluded from the trees and buildings to be removed. If bats are disturbed during tree or building removal, work shall be safely suspended until all bats leave the vicinity on their own. Work

shall resume only once it has been determined that all bats have left the site, as determined by the qualified biologist. Surveys and exclusion measures are expected to prevent maternal colonies from becoming established in the Biological Study Area. In the event a maternal colony of bats is found, no work shall be conducted within 100 feet of the maternal roosting site until the maternal season (typically April to September) is over or the bats have left the site, or as otherwise determined by a qualified biologist. The site shall be designated as a sensitive area and protected as such until the bats have left the site. No clearing and grubbing shall be authorized adjacent to the roosting site. Combustion equipment, such as generators, pumps, and vehicles, shall not be parked nor operated within 100 feet of the roosting site. Fencing or other barriers shall be installed around the buffer area, and construction personnel shall not be authorized to enter areas beneath the colony, especially during the evening exodus.

Conclusion

As provided in the Original EIR and MND, no significant impacts to biological resources would occur. As discussed above, with implementation of the above mitigation measures, potential impacts to biological resources would be reduced to a less-than-significant level. As such, the Project would not result in new impacts to biological resources when compared to the impacts set forth in the Original EIR and MND.

V. CULTURAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Disturb any human remains, including those interred outside of dedicated cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in the California Register of Historical Resources; (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a

resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources.

The earliest educational facilities within the Project Site were placed on the site in 1983. Therefore, due to the lack of sufficient age and historical/architectural associations, none of the structures within the Project Site are eligible for Federal, State, or local historical designation, nor are they considered historic resources pursuant to CEQA Section 15064.5. As such, removal or demolition of any of the existing school facilities on-site would not cause a substantial adverse change in significance of a historic resource. Thus, no impacts associated with historic resources would occur, and no mitigation measures are required.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that “has yielded, or may be likely to yield, information important in prehistory or history.” Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

As described above, the Project Site is currently developed with existing educational buildings, athletic facilities, parking, headmaster’s house, landscaped areas, and support facilities (i.e., guard house). Since the Project Site has been previously disturbed and graded to a depth of approximately 31 feet below ground surface, the potential for uncovering archaeological resources during construction of the Project is limited. Based on a records search conducted by the South Central Coastal Information Center (SCCIC), while there are currently no recorded archaeological sites mapped by the SCCIC within the Project Site, buried resources could potentially be unearthed during additional construction activities. In the event any archaeological materials are unexpectedly encountered during construction, work in the area would cease, and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. As set forth in CEQA Guidelines Section 15064.5, if the City determines that the archaeological resource is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code. If an archaeological resource does not meet the criteria for historical resources, but does meet the definition of a unique archaeological resource, the resource shall be treated in accordance with the provisions of Section 21083.2. Compliance with the regulatory standards in Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5 would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading activities. Therefore, through compliance with applicable regulations governing the treatment of any uncovered archaeological resources, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts to archaeological resources would be less than significant, and no mitigation measures are required.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. As discussed above, the Project Site has been subject to previous grading and development. No known traditional burial sites have been identified on-site. In addition, if human remains were discovered during construction of the Project, work in the immediate vicinity would be

halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. With the implementation of regulatory requirements which are included below as Mitigation Measure CUL-MM-1, the Project would not disturb any human remains, and impacts related to human remains would be less than significant.

Mitigation Measures

As provided above, the Project would not result in significant impacts to cultural resources. However, Mitigation Measure CUL-MM-1 is included below to ensure any human remains that may be inadvertently discovered would be treated in accordance with regulatory requirements.

Mitigation Measure CUL-MM-1: If human remains are encountered during construction, work in the affected area and the immediate vicinity shall be halted immediately (within a 100-foot buffer of the find). The on-site lead/foreman shall then immediately notify the FTBML, the applicant/developer, and the Lead Agency. The Lead Agency and the applicant/developer shall then immediately contact the County Coroner regarding the discovery. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within 24 hours of the determination, as required by California Health and Safety Code Section 7050.5 (c). The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code Section 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how the human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, Lead Agency, and landowner agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes. The MLD shall complete their inspection and make recommendations within 48 hours of the site visit, as required by California Public Resources Code Section 5097.98.

Conclusion

As provided in the Original EIR and MND, no significant impacts to cultural resources would occur. As discussed above, potential impacts to cultural resources would be less than significant. As such, the Project would not result in new impacts to cultural resources when compared to the impacts set forth in the Original EIR and MND.

VI. ENERGY

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. In order to determine if the Project would result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during the construction or operation of the Project, an analysis of the Project's energy use has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following topics that the lead agency may consider in the discussion of energy use, where topics are applicable or relevant to a project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with the considerations above, the analysis below evaluates the potential energy impacts of the Project with an emphasis on whether the Project would result in the inefficient, wasteful, or unnecessary consumption of energy. The supporting energy calculations are included in Appendix 4 of this Subsequent MND.

Electricity transmission to the Project Site is provided and maintained by the Los Angeles Department of Water and Power (LADWP) through a network of utility poles and underground utility lines. Natural gas service in the vicinity of the Project Site is provided by the Southern California Gas Company (SoCalGas).

Construction

During construction of the Project, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction activities typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction worker travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from existing electrical poles near the Project Site. As shown in Table 6 on page 63, approximately 12,243 kWh of electricity would be consumed during Project construction. This consumption of electricity would be a small fraction of that used for operation of the school and would represent less than 0.0001 percent of LADWP's projected sales in 2020. In addition, this demand would not significantly affect the ability of LADWP to accommodate peak local and regional electrical demands. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Therefore, the use of electricity during Project construction would not be wasteful, inefficient, or unnecessary.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support construction activities for the Project and there would be no demand generated by construction.

Transportation Energy

As shown in Table 6, on- and off-road vehicles would consume an estimated 8,469 gallons of gasoline and approximately 138,972 gallons of diesel fuel throughout the Project's construction. This consumption would represent approximately 0.0001 percent of the 2020 annual on-road gasoline-related energy consumption and 0.01 percent of the 2020 annual diesel fuel-related energy consumption in Los Angeles County. The consumption of petroleum-based fuels during construction would be temporary and would cease upon the completion of construction. The consumption of petroleum-based fuels would also vary throughout construction of the Project as certain phases of construction would require greater use of petroleum-based fuels compared to other phases of construction. Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. On-road vehicles (i.e., haul trucks, worker vehicles) would also be

Table 6
Summary of Energy Use During Construction^a

| Fuel Type | Quantity |
|--|------------------------|
| Electricity | |
| Water Consumption | 2,415 kWh |
| Construction Temporary Power (Lighting, power tools) | 9,828 kWh |
| Total Electricity | 12,243 kWh |
| Gasoline | |
| On-Road Construction Equipment | 8,469 gallons |
| Off-Road Construction Equipment | 0 gallons |
| Total Gasoline | 8,469 gallons |
| Diesel | |
| On-Road Construction Equipment | 36,618 gallons |
| Off-Road Construction Equipment | 102,353 gallons |
| Total Diesel | 138,972 gallons |
| <hr/> <i>kWh = Kilowatt-hour</i> ^a Detailed calculations are provided in Appendix 4 of this Subsequent MND. Source: Eyestone Environmental, 2021. | |

subject to Federal fuel efficiency requirements. Therefore, the use of gasoline and diesel fuel during Project construction would not be wasteful, inefficient, or unnecessary.

Construction Materials

Estimating the energy usage associated with the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. However, it is expected that the materials which would be used during the Project's construction would be manufactured/produced in a facility which is in compliance with the applicable regulatory requirements such as Title 24 or CalGREEN requirements. Additionally, it is expected that the transport of the materials would be in compliance with the applicable regulatory requirements regarding energy usage such as compliance with Federal Corporate Average Fuel Economy (CAFÉ) requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Conclusion

Based on the above, construction of the Project would not have a substantial impact on local and regional energy supplies, peak demand for electricity, or energy resources. In addition, construction of the Project would comply with existing applicable energy standards and would not result in substantial transportation energy use. Thus, the Project's construction activities would not result in significant impacts associated with the wasteful, inefficient, or unnecessary use of energy resources.

Operation

During operation of the Project, energy would be consumed mainly for lighting purposes, water usage, heating, ventilation or air conditioning (HVAC), vehicular trips associated with the potential increase in 50 additional faculty and staff members, and EV charging. Annual energy use has been calculated for buildout of the Project and is shown in Table 7 on page 65.

Electricity

After the construction of the Project is complete, there would be a net increase in electricity usage on the Project Site compared to existing conditions. As shown in Table 7, with buildout of the Project, the on-site electricity demand would be approximately 584 MWh of electricity per year.²⁰ This electrical demand would represent a small fraction of the existing demand for electricity by the Curtis School and would represent approximately 0.0026 percent of LADWP's projected sales in 2020. In addition, the Project Site would result in a net increase in daily peak load of 87 kW. In comparison to the LADWP power grid base peak load of 5,845 MW in 2017, the Project Site net energy demand would represent approximately 0.001 percent of the LADWP base peak load conditions. This demand would not significantly affect the ability of LADWP to accommodate peak electrical demands.

The Project would also comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements, which were adopted to reduce energy consumption. Such measures include use of light emitting diode (LED) lighting where appropriate. Sustainable features also would include the use of native/adapted plant species and use of low VOC paints and finishes. These features would reduce energy and water usage. In addition, 30 percent of the Project's parking spaces would be constructed to be capable of supporting future EV-charging stations with at least 10 percent of the parking spaces constructed with EV-charging stations. Electrical usage from the installed EV charging-stations is also included in Table 7. As shown therein, use of the EV chargers would result in approximately 159 MWh of the annual building electricity usage with an equivalent reduction of 2,155 gallons of fossil fuels per year from vehicular travel. As set forth in Executive Order (EO) B-48-18, signed by Governor Edmund G. Brown Jr. on January 26, 2018, state entities should work to "spur the construction and installation of... 250,000 zero-emission vehicle chargers, including 10,000 direct current fast chargers, by 2025."²¹ Furthermore, the 2019 Sustainable City pLAn/L.A.'s Green New Deal established a target of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028. As such, the installation of EV ready and EV-charging stations as part of the Project would support these goals. Therefore, the use of electricity during Project operations would not be wasteful, inefficient, or unnecessary.

Natural Gas

As provided in Table 7, the buildout of the Project is projected to generate a net increase in the onsite demand for natural gas totaling approximately 593,592 cf per year, assuming compliance with Title 24 standards and applicable CALGreen Code requirements. Based on the 2018 California Gas Report, the

²⁰ Electricity demand estimate includes electricity for the restroom, LED lighting and EV charging. Calculations are provided in Appendix 4 of this Subsequent MND.

Table 7
Summary of Annual Energy Use During Operation^a

| Source | Project with Project Features |
|--|-------------------------------|
| Electricity | |
| Building ^b | 362 MWh |
| Water | 63 MWh |
| EV Chargers ^b | 159 MWh |
| Total Electricity | 584 MWh |
| Natural Gas | 593,592 cf |
| Mobile^c | |
| Gasoline | 18,360 gallons |
| Diesel | 3,195 gallons |
| <hr/> <i>MWh = megawatt-hours</i> <i>cf = cubic feet</i> ^a Detailed calculations are provided in Appendix 4 of this Subsequent MND. ^b The Project will comply with City codes requiring 10 percent of parking spaces to be equipped with EV chargers. It is conservatively assumed that 10 percent of Project VMT would be powered by electricity. ^c Although installation of EV-charging stations would reduce transportation fuel usage, the analysis conservatively did not take credit for this reduction. Source: Eyestone Environmental, 2021. | |

California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.54 billion cf/day in 2020 (the Project's buildout year).²² The Project would account for approximately 0.00006 percent of the 2020 forecasted consumption in SoCalGas' planning area. In addition, the Project would incorporate a variety of energy conservation measures to reduce energy usage. Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As summarized in Table 7, the Project's estimated petroleum-based fuel usage would result in an increase of 18,360 gallons of gasoline and 3,195 gallons of diesel per year, or a total of 21,555 gallons of petroleum-based fuels annually.

Based on the above, operation of the Project would not have a substantial impact on local and regional energy supplies, peak demand for electricity, or energy resources. In addition, operation of the Project

²¹ California Executive Order B-48-18 (Jan. 26, 2018).

²² California Gas and Electric Utilities, 2018 California Gas Report, p. 100.

would comply with existing applicable energy standards. Thus, Project operations would not result significant impacts associated with the wasteful, inefficient, or unnecessary use of energy resources.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. The energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, the Project would not conflict with applicable plans for renewable energy or energy efficiency. With regard to transportation related energy usage, the Project would comply with goals of the SCAG's 2016 RTP/SCS, which incorporates VMT targets established by SB 375. Vehicle trips generated during Project operations would comply with CAFE fuel economy standards. During construction activities, the Project would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would represent a small fraction LADWP's projected and planned sales. Similarly, petroleum-based fuels during construction would also represent a small fraction of the projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in significant impacts related to energy. Therefore, no mitigation measures are required.

Conclusion

While the Original EIR and MND did not evaluate impacts regarding energy, as provided above, the Project would not result in significant impacts associated with energy use.

VII. GEOLOGY AND SOILS

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

The following analysis is based, in part, on the Geotechnical Feasibility Report prepared for the Project by Partner Engineers, dated April 24, 2019. This report is included as Appendix 5 of this Subsequent MND.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other

substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement younger than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The California Geological Survey establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City of Los Angeles designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

As provided in the Geotechnical Feasibility Report, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone as designated by the California Geological Survey. In addition, the Project Site is not located within a City-designated Fault Rupture Study Area.²³ The nearest active fault to the Project Site is the Hollywood Fault located approximately 4 miles southeast of the Project Site. As such, no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, since there are no known faults beneath the Project Site, the Project would not exacerbate existing environmental conditions such that people or structures would be exposed to rupture of a known earthquake fault. Furthermore, even though the Project would involve excavation activities, the proposed development would not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not result in the rupture of a known earthquake fault caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Impacts regarding the rupture of a known earthquake fault would be less than significant, and no mitigation measures are required.

ii. Strong seismic ground?

Less Than Significant Impact. The Project Site is located in the seismically active Southern California region, which is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. However, as previously discussed in Checklist Question VII.a.i, above, no active faults are known to pass directly beneath the Project Site and, therefore, the Project would not exacerbate existing environmental conditions (i.e., trigger an earthquake by disrupting a known earthquake fault) such that people or structures would be exposed to strong seismic ground shaking. In addition, the Project would

²³ City of Los Angeles, Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 12, 2018.

not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions like strong seismic ground shaking. Therefore, development of the Project would not result in strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. Notwithstanding, state and local code requirements ensure that buildings are designed and constructed in a manner that, although the buildings may sustain damage during a major earthquake, would reduce the substantial risk that buildings would collapse. As with other development projects in the City of Los Angeles, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code with City amendments. The California Building Code incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to lessen the effect of losses from an earthquake and maximize earthquake safety. The Los Angeles Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code. The Project would therefore be required to comply with the plan check review and permitting requirements of the Los Angeles Department of Building and Safety, including the incorporation of the recommendations provided in a final, site-specific geotechnical report. In addition, before permits can be issued for construction, the Project must demonstrate compliance with the applicable provisions of seismic safety plans and regulations, including, but not limited to, the Seismic Safety Act and Seismic Hazards Mapping Act. As such, impacts regarding strong seismic ground shaking would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

The Project Site is not located within a state-designated Liquefaction Zone or within a City-designated liquefiable or potentially liquefiable area.^{24,25} In addition, no groundwater was encountered during previous borings to a depth of 41 feet. Thus, there is no shallow groundwater on the Project Site. Furthermore, development of new buildings within the Project Site would occur in compliance with regulatory requirements, including the California Building Code and the LAMC, as discussed above in Checklist Question VII.a.ii, which would address soil stability. Therefore, impacts with regard to liquefaction would be less than significant, and no mitigation measures are required.

iv. Landslides?

Less Than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rock on steep sloping terrain. The Project Site is located within the Santa Monica Mountains. As such, the

²⁴ State of California, Department of Conservation, California Geological Survey, Seismic Hazard Zone Map, Van Nuys Quadrangle.

²⁵ City of Los Angeles, Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed June 12, 2018.

Project Site is in close proximity to sloping hillsides. In addition, an area at the southern edge of the Project Site along Mulholland Drive and two other areas at the northern edge of the Project Site along Mulholland Place are located within an Earthquake-Induced Landslide Area as designated by the California Geological Survey.^{26,27} Furthermore, the Project Site is also located within a designated landslide area by the City of Los Angeles.²⁸ Thus, areas bounding the Project Site would potentially be susceptible to landslides. However, as discussed in the Geotechnical Feasibility Report, a portion of the Project Site is already included in the slope setback easement for the Mulholland Scenic Corridor, and the potential for seismically induced landslides affecting construction of the Project is considered negligible. Notwithstanding, to minimize seismic impacts, the Project would comply with *California Geological Survey Special Publications 117A (2008), Guidelines for evaluating and Mitigating Seismic Hazards in California*, which provides guidance for reducing seismic-related hazards such as landslides. In addition, the Project would adhere to local and state building codes including the LAMC, the Los Angeles Building Code, and the California Building Code, as well as the recommendations provided in a site-specific geotechnical report, as required by the LAMC to minimize seismic-related hazards. Therefore, the Project would not exacerbate existing conditions that would result in landslides. As such, impacts with respect to landslides would be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction of the Project would require the export of soil. As such, exposed soils from grading and stockpiling could be subject to erosion and conveyance into nearby storm drains during a stormwater event. However, Project construction would occur in compliance with local construction requirements that would implement the requirements of the National Pollutant Discharge Elimination System (NPDES) permit. In accordance with the NPDES permit, the Project would include best management practices during construction of the Project to minimize erosion, including scheduling excavation and grading activities during dry weather periods, installing erosion control and drainage devices, and securing stockpiles and excavated soils with tarps or plastic sheeting. In addition, all grading activities would require grading permits from the Los Angeles Department of Building and Safety, which would include requirements and standards designed to limit potential effects associated with erosion to acceptable levels. On-site grading and site preparation would also comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

During operation of the Project, the potential for soil erosion to occur within the areas of the Project Site to be developed is limited. The existing site was previously graded with open concrete culverts. The Project would retain this existing drainage system and would only expand the existing drainage system as necessary to support the proposed improvements. In addition, the Project would include the installation of retaining walls, where necessary, associated with the reconfiguration of the athletic fields and parking lot and the proposed Performing Arts Building, to retain soils. Further, the majority of the campus would include permeable surfaces with approximately 65 percent of the campus to remain permeable and approximately 35 percent as non-permeable surface. Also, in accordance with requirements of the

²⁶ State of California, Department of Conservation, California Geological Survey, Seismic Hazard Zone Map, Van Nuys Quadrangle, http://gmw.consrv.ca.gov/shmp/download/pdf/ozn_vn.pdf, accessed June 12, 2018.

²⁷ As defined by the CGS, Earthquake-Induced Landslide Areas are areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical, and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

²⁸ City of Los Angeles, Department of City Planning, ZIMAS, <http://zimas.lacity.org/>, accessed June 12, 2018.

NPDES permit, Standard Urban Stormwater Mitigation Plan (SUSMP) requirements would be implemented throughout the operational life of the Project to reduce erosion impacts. A SUSMP is a working plan that is systematically reviewed and revised to ensure that appropriate Best Management Practices (BMPs) are implemented to prevent erosion and stormwater runoff impacts.

Based on the above, with compliance with applicable regulatory requirements, impacts regarding soil erosion or the loss of topsoil would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Lateral spreading is a term referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement.²⁹ As discussed above in Checklist Question VII.a.iv, due to the Project Site's location within the Santa Monica Mountains, the Project Site is in close proximity to sloping hillsides. In addition, as described above, an area at the southern edge of the Project Site along Mulholland Drive and two other areas at the northern edge of the Project Site along Mulholland Place are located within an Earthquake-Induced Landslide Area as designated by the California Geological Survey. The Project Site is also located within a designated landslide area by the City of Los Angeles. Thus, areas bounding the Project Site would potentially be susceptible to landslides. However, as discussed above, to minimize seismic impacts, the Project would comply with the *California Department of Conservation Division of Mines and Geology Special Publications 117A (2008), Guidelines for evaluating and Mitigating Seismic Hazards in California*, which provides guidance for reducing seismic-related hazards. In addition, the Project would adhere to local and state building codes including the LAMC and the California Building Code, as well as the site-specific recommendations set forth in a geotechnical report. Therefore, with compliance with the aforementioned regulatory requirements, impacts with respect to landslides would be less than significant.

Subsidence occurs when subsurface fluids (e.g., petroleum, groundwater, natural gas) are withdrawn from the ground. Based on the Geotechnical Feasibility Report for the Project Site, groundwater was not encountered in exploratory borings of up to 41 feet below ground surface. Based on the maximum depth of excavation of approximately 31 feet below ground surface, no groundwater would be expected to be encountered during Project construction. In addition, no large-scale extraction of groundwater, gas, oil or geothermal energy is occurring or planned at the Project Site or in the general Project Site vicinity. Thus, impacts with respect to subsidence would be less than significant, and no mitigation measures would be required.

As discussed above in Checklist Question VII.a.iii, the Project Site is not located within a state-designated Liquefaction Zone or within a City-designated liquefiable or potentially liquefiable area. In addition, development of new buildings within the Project Site would occur in compliance with regulatory requirements, including the LAMC, which incorporates the California Building Code. Therefore, impacts with regard to liquefaction would be less than significant, and no mitigation measures would be necessary.

²⁹ U.S. Geological Survey, Earthquake Glossary, <http://earthquake.usgs.gov/learn/glossary/>, accessed June 12, 2018.

Overall, the Project would not exacerbate existing conditions such as unstable geologic units or unstable soil. As such, impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. As discussed in the Geotechnical Feasibility Report, the on-site geological soils consist of interbedded fine and very fine grained sandstone, siltstone and clayey siltstone, and engineered fill of sand silt to at least 30 to 31 feet below ground surface. The deposits identified were damp to moist and dense to very dense to a depth of 41 feet below ground surface. Soils underlying the Project Site are not considered expansive soils. Therefore, the Project would not exacerbate any existing environmental conditions that could create substantial risk to life or property due to expansive soil. As such, impacts with respect to expansive soils would be less than significant, and no mitigation measures are necessary.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located within a community served by an existing wastewater collection, conveyance, and treatment system operated by the City of Los Angeles Department of Water and Power. The Project's wastewater demand would be accommodated via connections to the existing wastewater infrastructure. As such, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures would be required.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct.

As the Project Site has been previously disturbed and graded to a depth of approximately 31 feet below ground surface, excavation activities during construction are not likely to encounter vertebrate fossil remains. Nonetheless, Mitigation Measure CUL-MM-1 is provided below to ensure that impacts with respect to paleontological resources would be less than significant.

A ridge, identified by the Mulholland Scenic Parkway Specific Plan as a prominent ridge, runs parallel from the School's entrance towards the east, along Mulholland Drive. A second prominent ridge is located to the north of the Project Site along Mulholland Place. As discussed above, these prominent ridges would not be affected by the Project. Thus, no impacts associated with destruction of a unique geologic feature would occur, and no mitigation measures are required.

Mitigation Measures

Mitigation Measure CUL-MM-1: If any paleontological materials are encountered during the course of the Project development, work in the area should be halted. The services of a qualified paleontologist shall be secured by contacting the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. In addition, a report on the paleontological findings shall be prepared by the qualified paleontologist. A copy of the paleontological report shall be submitted to the Los Angeles County Natural History Museum.

Conclusion

The Original EIR determined that impacts regarding geology and soils would be less than significant with mitigation. As evaluated above, with implementation of mitigation, the Project would not result in significant impacts associated with geology and soils. Therefore, the Project would not result in new impacts with regard to geology and soils when compared to the impacts set forth in the Original EIR and MND.

VIII. GREENHOUSE GAS EMISSIONS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as Assembly Bill 32 (AB 32), into law. AB 32 commits the state to the following:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 levels; and
- By 2050, reduce to 80 percent below 1990 levels.

To achieve these goals, AB 32 mandates that the California Air Resources Board establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide

Greenhouse Gas Emissions (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Senate Bill (SB) 1368, a companion bill to AB 32, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

The California Air Resources Board approved a *Climate Change Scoping Plan* required by AB 32 in 2008.³⁰ The *Climate Change Scoping Plan* proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”³¹ The First Update to the AB 32 Scoping Plan (Updated Scoping Plan), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.³²

In December 2017, the California Air Resources Board adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update). The 2017 Update builds upon the successful framework established by the *Climate Change Scoping Plan* and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.³³

The City of Los Angeles published the “*Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*” (*LA Green Plan*), outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the *LA Green Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

³⁰ Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

³¹ Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplan_document.htm.

³² CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

³³ CARB, 2017 Update, November 2017, p. 6.

To facilitate implementation of the Green LA Plan, the City adopted the Los Angeles Green Building Code.³⁴ In addition, LADWP will continue to implement programs to emphasize water conservation and will pursue securing alternative supplies, including recycled water and storm water capture. Furthermore, the City implemented the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) plan to meet solid waste reduction goals by expanding recycling to multifamily dwellings, commercial establishments, and restaurants. Under the RENEW LA plan, the City is also developing facilities that will convert solid waste to energy without incineration.³⁵ These measures would serve to reduce overall emissions from the City.

The analysis of GHG emissions is different from the analysis of criteria pollutants. For criteria pollutants, significance thresholds have been established by SCAQMD based on ambient air quality standards. For GHG emissions, however, no significance thresholds have been established by the state, SCAQMD or the City of Los Angeles. Thus, at this time, there is no established methodology for analyzing GHG emissions and determining the significance of those emissions in the context of this analysis.

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.³⁶ The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future." The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."

In January 2008, the California Air Pollution Control Officers Association (CAPCOA) issued a guidance document that identified a number of potential approaches for evaluating the significance of GHG emissions in CEQA documents.³⁷ CAPCOA suggested that a lead agency evaluate the significance of a project's GHGs on a case-by-case basis when no applicable thresholds have been adopted. CAPCOA identified a number of potential methods to evaluate projects on a case-by-case basis, including: establishing a threshold below which project GHG emissions would not contribute to a significant impact; evaluating a project's consistency with adopted GHG regulations, plans and policies; and demonstrating a project reduces its GHG emissions by a specified percentage.

OPR's recommended Amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009. Analysis of GHG emissions in a CEQA document presents unique challenges to lead agencies. However, such analysis must be consistent with existing CEQA principles and, therefore, the Amendments comprise relatively modest changes to various portions of the existing CEQA Guidelines. The Amendments add no additional substantive requirements; rather, the Guidelines

³⁴ On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which further amended LAMC Chapter IX by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code.

³⁵ City of Los Angeles, Recovering Energy Natural Resources and Economic Benefit from Waste for Los Angeles, June 2011.

³⁶ California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level.

³⁷ CAPCOA, "CEQA & Climate Change," January 2008.

merely assist lead agencies in complying with CEQA's existing requirements. Furthermore, modifications address those issues where analysis of GHG emissions may differ in some respects from the more traditional CEQA analyses. Other modifications clarify existing law that may apply both to an analysis of GHG emissions as well as more traditional CEQA analyses.

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, this section recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The adopted Amendments do not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence. (See Section 15064.7(c)). The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses (See Section 15130(f)).

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance,³⁸ and should make a "good-faith" effort to "describe, calculate or estimate" the amount of GHGs that will result from a project.³⁹ The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.⁴⁰ A lead agency should also "consider" the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.⁴¹

In October 2008, staff for SCAQMD released a *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold* (SCAQMD Draft GHG Guidance Document) that provided a tiered approach for considering GHG emissions from an individual project. According to the SCAQMD Draft GHG Guidance Document, a project would have a less than significant GHG impact if it falls into one of five tiers, generally defined as follows:⁴²

³⁸ GHG CEQA Guidelines § 15064.4(a).

³⁹ GHG CEQA Guidelines § 15064.4(a).

⁴⁰ GHG CEQA Guidelines § 15064.4(a)(1)-(2).

⁴¹ GHG CEQA Guidelines § 15064.4(b).

⁴² SCAQMD, "Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold," p 3-10, October 2008.

- Tier 1: A CEQA exemption applies.
- Tier 2: The Project is consistent with an approved GHG reduction plan.
- Tier 3: The Project GHG emissions are less than 3,000 MTCO_{2e}/year for commercial projects if reduction targets related to energy and water use are also met.
- Tier 4: The Project meets a performance standard of reducing emissions 30 percent below “business as usual.”
- Tier 5: Project offsets or mitigation measures achieve targets in Tiers 1 through 4.

For the Project, no applicable significance threshold for GHG emissions has been adopted by the State, SCAQMD or the City of Los Angeles. Although State, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project’s GHG emissions. Accordingly, the potential significance of the Project’s GHG emissions will be evaluated based on the SCAQMD Draft GHG Guidance Document by carefully considering the Project’s expected GHG emissions in the context of the tiered approach. This approach is consistent with the State CEQA Guidelines and CAPCOA’s guidance, discussed above.

The California Climate Action Registry (CCAR)⁴³ prepared a protocol for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁴⁴ This guidance was used to calculate the GHG emissions from the Project. To be consistent with the guidance from the SCAQMD only the GHG emissions resulting from the incremental increase in usage of on-road motor vehicles, electricity, natural gas, and water usage/wastewater generation upon implementation of the Project were considered as Project-related. In addition, since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions were also calculated for the Project’s construction activities and are presented on an annual basis.

Not all GHGs exhibit the same ability to induce climate change. As a result, GHG contributions are commonly quantified in terms of what would be, in global warming potential (GWP), an equivalent mass of CO₂, denoted as CO_{2e}. Mass emissions are calculated by converting pollutant specific emissions to CO_{2e} emissions by applying the proper global warming potential (GWP) value.⁴⁵ These GWP ratios are available from the USEPA and published in the CCAR protocol. By applying the GWP ratios, Project-related CO_{2e} emissions can be tabulated in metric tons per year. The CO₂ values were calculated for the proposed improvements in order to estimate the project-generated GHG emissions.

⁴³ CCAR was “a public/private partnership created by the State of California to encourage... government agencies and... organizations that do business in California to voluntarily measure and report their [GHG] emissions.” State of California. California Climate Action Registry. The law establishing CCAR (Health and Safety Code §§ 42820 *et seq.*) sunset as of Jan. 1, 2008, but CCAR continues as “a private non-profit organization originally formed by the State of California,” serving as “a voluntary... registry to promote and protect businesses’ early actions to manage and reduce their greenhouse gas (GHG) emissions,” www.climateactionreserve.org/about-us/california-climate-action-registry/, accessed June 29, 2018.

⁴⁴ CCAR, General Reporting Protocol Version 3.1 (January 2009).

⁴⁵ CO_{2e} was developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) 1996.

Construction

Greenhouse gas emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing, and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix 3 of this Subsequent MND).

As presented in Table 8 on page 79, construction of the Project is estimated to generate a total of 2,366 metric tons of CO₂e. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix 3 of this Subsequent MND.

Operation

The Project is associated with direct and indirect GHG emissions generated by the increase in vehicular trips associated with the potential increase in 50 additional faculty and staff members over the currently permitted faculty and staff,⁴⁶ and square footage of occupied buildings, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). As presented in Table 9 on page 80, the Project's operational emissions are relatively minor for a commercial Project. According to the SCAQMD Draft GHG Guidance Document, commercial projects emitting less than 3,000 MTCO₂e/yr are less than significant. As shown in Table 9, the Project would emit approximately 20 percent of this threshold (611 MTCO₂e/yr) and the Project's climate change impacts with regard to GHG emissions would be less than significant.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project is consistent with the approach outlined in the CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating

⁴⁶ It was conservatively assumed that the added employees would contribute a total of 54 trips during the A.M. and P.M. peak hours. A review of the general urban/suburban trip generation rates for Land Use Code 715, Single Tenant Office Building, from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, indicates this use generates 3.625 times as many trips on a daily basis as it does during the combined A.M. and P.M. peak hours of the generator [3.77 daily trips per employee / (0.53 A.M. trips per employee + 0.51 P.M. trips per employee)]. This would be considered an appropriate peak-to-daily trip ratio to apply for school employees, given that single tenant office buildings experience trips mostly by employees during the peak hours and their arrival/departure patterns are grouped. Applying this ratio of 3.625 to the 54 combined peak-hour trips for the added school employees yields a daily trip estimate of 196 trips.

Table 8
Construction Related Emissions
(Metric Tons of CO₂e)

| Year | Total | Amortized ^a |
|--|-------|------------------------|
| Phase I | 959 | 32 |
| Phase II | 1,407 | 47 |
| Total | 2,366 | 79 |
| ^a As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. Source: Eyestone Environmental, 2021. | | |

the transition to a low-carbon economy. For example, the School's Existing CUP requires 80 percent of the students and 50 percent of the staff to carpool/rideshare/bus/vanpool.

The Project Applicant proposes to continue operating within these parameters. The Project would also comply with Title 24 energy efficiency requirements. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features (e.g., waterless urinals and low-flush toilets) as a framework for achieving cross-cutting emissions reductions.

The Project is designed with a number of features that are consistent with the following City of Los Angeles goals provided in the Air Quality Element of the City of Los Angeles General Plan:

- Improving energy and water efficiency in buildings;
- Water efficient landscaping;
- Reducing per capita water use; and
- Increasing recycling rates.

The Project is also consistent with the City's Green LA Plan. The Green LA Plan emphasizes improving energy conservation, enhancing energy efficiency, increasing renewable energy generation, increasing the diversion of solid waste from landfills, and changing transportation and land use patterns to reduce auto dependence. As stated above, the Project will not increase local or regional traffic. The Project will require the use of water conservation measures (e.g., waterless urinals and low-flush toilets) energy reduction measures (compliance with Title 24 energy efficiency requirements), and green waste diversion measures.

Where applicable the Project also would comply with the City of Los Angeles Green Building Ordinance. This Program emphasizes improving energy conservation, energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's design features would advance these objectives.

Table 9
Operational Greenhouse Gas Emissions

| Emission Source | CO ₂ ee (Metric Tons) |
|---------------------------------------|----------------------------------|
| Area | <1 |
| Energy | 236 |
| Mobile | 215 |
| Waste | 39 |
| Water | 43 |
| Construction | 79 |
| Total | 611 |
| SCAQMD Significance Threshold | 3,000 |
| Difference | (2,389) |
| Significant | No |
| Source: Eyestone Environmental, 2021. | |

Given the Project's consistency with State and City of Los Angeles GHG emission reduction objectives, the contribution to global climate change would be less than significant and would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Mitigation Measures

As provided above, the Project would not result in significant impacts related to greenhouse gas emissions. Therefore, no mitigation measures are required.

Conclusion

While the Original EIR and MND did not evaluate impacts regarding greenhouse gas emissions, as provided above, the Project would not result in significant impacts associated with greenhouse gas emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project: | | | | |
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. The types and amounts of hazardous materials that would be used during construction and operation of the Project would be typical of those used for construction and operation of educational facilities, including vehicle fuels, oils, transmission fluids, paint, adhesives, surface coatings and other finishing materials, cleaning solvents, and pesticides for landscaping purposes. All potentially hazardous materials would be used and disposed of in accordance with manufacturers' specifications as well as with all applicable federal, state, and local health and safety regulations. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train employees about hazardous materials. Finally, the Project would not involve the routine transport of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Impacts would be less than significant, and no mitigation measures are required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Lead was widely used as a major ingredient in most interior and exterior oil-based paints prior to 1950, and was banned by the federal government in 1978, prior to construction of the Curtis School. Asbestos containing materials (ACM) have been widely used historically in the building industry for a variety of uses, including acoustic and thermal insulation and fireproofing. Despite its useful qualities, asbestos is associated with lung diseases caused by inhalation of airborne asbestos fibers. Asbestos becomes a hazard if the fibers separate and become airborne.

Given the date the Curtis School was constructed, lead-based paints and asbestos-containing materials would not be expected to have been used in the building materials, as the use of such materials has been regulated since before construction of the existing Curtis School in approximately 1983. In addition, as discussed above, all potentially hazardous materials used during construction and operation of the Project would be used, stored, and disposed of in accordance with manufacturers' specifications as well as applicable federal, state, and local health and safety regulations. As such, impacts associated with the release of hazardous materials would be less than significant, and no mitigation measures are required.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. Several schools are located within 0.25 mile of the Project Site, including Milken Community Middle School and High School and Berkeley Hall School. However, as discussed above in Checklist Question IX.a, limited quantities of potentially hazardous materials would be used during construction of the Project on a temporary basis. In addition, limited quantities of potentially hazardous materials would be used during operation and would be typical of those used at the School and at other schools in the area for custodial purposes and landscaping needs. Students, faculty, and staff of the Curtis School and the surrounding schools would not be at risk due to the use of these materials, as these materials would be used, stored, and disposed of in accordance with manufacturers' specifications and applicable federal, state, and local health and safety regulations. In addition, no acutely hazardous materials, substances, or waste would be handled on-site subsequent to Project implementation. As such, impacts with regard to the release of hazardous materials within 0.25 mile of a school would be less than significant, and no mitigation measures are required.

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

No Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a "list" of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a "list," many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the California Department of Toxic Substances Control, the State Water Board, and CalEPA. The Department of Toxic Substances Control maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive

investigations are planned or have occurred. The database provides a listing of Federal Superfund sites, State Response sites, Voluntary Cleanup sites, and School Cleanup sites.

Based on a review of the EnviroStor database, the Project Site is not identified on any of the above lists.⁴⁷ In addition, the Project Site is not on the State Water Board's Geotracker Database, which provides a list of leaking underground storage tank sites that are included on the Cortese List.⁴⁸ Lastly, the Project Site is not listed on CalEPA's list of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) or list of contaminated solid waste disposal sites.^{49,50} As such, the Project could not exacerbate any existing environmental conditions that could otherwise create a significant hazard to the public or the environment associated with the Project Site being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impacts would occur, and no mitigation measures are required.

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

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public airport. The closest airport to the Project Site is the Van Nuys Airport, located approximately 5 miles to the north. As such, the Project would not result in a safety hazard for people due to a public airport. No impacts would occur, and no mitigation measures would be necessary.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. Exhibit H identifies the I-405 Freeway as the designated evacuation route closest to the Project Site.⁵¹ Primary access to the Project Site is and would continue to be provided from Walt Disney Drive via Mulholland Drive.

Short-term Project construction activities and the staging of construction equipment would occur mainly within the existing Curtis School campus. Emergency access to the Project Site during construction would be maintained via Mulholland Drive and Walt Disney Drive and Mulholland Place. Project construction activities would also not impede access to other nearby uses. Furthermore, the Project

⁴⁷ Department of Toxic Substances Control, Envirostor Database, www.envirostor.dtsc.ca.gov/public/, accessed June 12, 2018.

⁴⁸ State Water Board Geotracker Database, <https://geotracker.waterboards.ca.gov/>, accessed June 12, 2018.

⁴⁹ California Environmental Protection Agency, List of "Active" CDO and CAO from Water Board, www.calepa.ca.gov/SiteCleanup/CorteseList/, accessed June 12, 2018.

⁵⁰ California Environmental Protection Agency, List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit, www.calepa.ca.gov/SiteCleanup/CorteseList/, accessed June 12, 2018.

⁵¹ Safety Element of the Los Angeles City General Plan, Exhibit H, City of Los Angeles, November 26, 1996.

would implement a Construction Staging and Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project Site vicinity. The Project would also be required to comply with all City and state building, fire and safety codes. In addition, the Project would be designed to conform to the standards of the City of Los Angeles Fire Department (LAFD) for emergency access, including fire lane (truck access) standards. The Project also would not install barriers that would impede access to the Project Site and vicinity and the Project would not result in the temporary or permanent closure of Mulholland Drive or any other streets in the vicinity of the Project Site. Therefore, construction and operation of the Project would not have the potential to interfere with access to and along a City-designated disaster route. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone, as established by the City of Los Angeles. As the Project has been identified as a Very High Fire Hazard Severity Zone, it is located within a selected wildlife fire hazard area identified by the City of Los Angeles. All projects located within a Very High Fire Hazard Severity Zone must comply with the requirements set forth for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. With implementation of these requirements, impacts associated with wildland fires would be less than significant, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in significant impacts related to hazards and hazardous materials. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that no significant impacts would occur with respect to hazards and hazardous materials. As discussed above, the Project would not result in significant impacts associated with hazards and hazardous materials. As such, the Project would not result in new impacts related to hazards and hazardous materials when compared to the impacts set forth in the Original EIR and MND.

X. HYDROLOGY AND WATER QUALITY

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

Would the project:

- a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? ☐ ☐ ☒ ☐

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: | | | | |
| i. Result in substantial erosion or siltation on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| iv. impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities*. In addition, Project construction

activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Additionally, based on the depth to groundwater (40 feet below ground surface) identified in the Geotechnical Feasibility Report, the Project's proposed excavation up to 31 feet below ground surface is not anticipated to encounter groundwater. As such, there would be no potential to affect groundwater quality.

As with existing conditions, operation of the Project would result in the potential for urban pollutants to be conveyed into nearby storm drains during stormwater events. In addition, though the increased parking capacity is not anticipated to be fully utilized on a daily basis, the provision of additional parking spaces at the Project Site would also be expected to contribute additional pollutants in stormwater runoff. However, in accordance with the City's Low Impact Development Ordinance (Ordinance No. 181899), BMPs would be implemented on-site to address City and State water quality requirements. Operational BMPs to be implemented may include screened or walled trash container areas and stenciling of on-site storm drain inlets.

Based on the above, with compliance with applicable requirements, Project construction and operation would not violate any water quality standards or waste discharge requirements. Therefore, impacts related to water quality would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed above, groundwater was not encountered in exploratory borings of up to 40 feet below ground surface. Given the maximum depth of grading of approximately 31 feet below ground surface, excavation activities would not be anticipated to encounter groundwater so as to result in the substantial depletion of groundwater supplies. In addition, with development of the Project, the majority of the campus would remain permeable with approximately 65 percent as permeable surfaces and only approximately 35 percent would include non-permeable surfaces. As such, the Project would not substantially interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. Therefore, impacts associated with groundwater supplies or groundwater recharge would be less than significant, and no mitigation measures are required.

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

i. result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Site is developed with existing educational buildings, athletic facilities, parking, headmaster's house, landscaped areas, and support facilities (i.e., guard house) and is not crossed by any water courses or rivers.

Construction activities associated with the Project, which would involve removal of some of the existing structures and grading, have the potential to temporarily alter existing drainage patterns on the Project

Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed above in Checklist Question X.a, the Project would be required to obtain coverage under the NPDES Construction General Permit. The SWPPP prepared pursuant to this permit requires BMPs and erosion control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City permit regulations, erosion control plans, LID, and inspections to reduce sedimentation and erosion.

With regard to operation, the Project has been designed to minimize the extent of non-permeable surfaces by consolidating the three parking areas currently on-site into one parking area while also locating the new parking area closer to the main entrance at Walt Disney Drive in order to reduce the need for additional roadway area (non-permeable area). The Project also proposes new two-story buildings and new landscaping and landscaped gardens, and walkways that would be located throughout the Project Site to reduce the overall building footprint. Thus, upon completion of the Project, the majority of the campus would remain permeable with approximately 65 percent as permeable surfaces and only approximately 35 percent as impervious surfaces. In addition, surface water runoff from the Project Site would continue to be directed into the City's storm drain system in accordance with regulatory requirements. Furthermore, in accordance with requirements of the City's Low Impact Development Ordinance, BMPs would be implemented throughout the operational life of the Project to reduce erosion.

Based on the above, the Project would not substantially alter the existing drainage pattern of the Project Site or surrounding area such that substantial erosion, siltation, or on-site or off-site flooding would occur. Therefore, impacts would be less than significant, and no mitigation measures are required.

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. As discussed above in Checklist Question X.c.i, the Project Site is not crossed by any water courses or rivers. In addition, the Project has been designed to minimize the extent of non-permeable surfaces by consolidating the three parking areas currently on-site into one parking area while also locating the new parking area closer to the main entrance at Walt Disney Drive in order to reduce the need for additional roadway (non-permeable area). The Project also proposes new two-story buildings and new landscaping and landscaped gardens, and walkways that would be located throughout the Project Site to reduce the overall building footprint. Thus, upon completion of the Project, the majority of the campus would remain permeable with approximately 65 percent as permeable surfaces and only approximately 35 percent as impervious surfaces. Additionally, the Project would retain the existing drainage system and would only expand the existing drainage system as necessary to support the proposed improvements to better control runoff. Therefore, drainage patterns would not be substantially altered as a result of the Project and a substantial increase in surface water runoff quantities would not occur. Impacts would be less than significant, and no mitigation measures would be necessary.

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

Less Than Significant Impact. As discussed above in Checklist Question X.c.i, the Project has been designed to minimize the extent of non-permeable surfaces by consolidating the three parking areas currently on-site into one parking area while also locating the new parking area closer to the main entrance at Walt Disney Drive in order to reduce the need for additional roadway (non-permeable area).

The Project also proposes new two-story buildings and new landscaping and landscaped gardens, and walkways that would be located throughout the campus to reduce the overall building footprint. With these features, upon completion of the Project, approximately 65 percent of the campus would remain permeable with only 35 percent as impervious surface. Therefore, drainage patterns would not be substantially altered as a result of the Project and a substantial increase in surface water runoff quantities would not occur. Additionally, the Project would retain the existing drainage system and would only expand the existing drainage system as necessary to support the proposed improvements to better control runoff. Thus, the amount of stormwater runoff would not be expected to measurably change relative to existing conditions. Furthermore, the City's Department of Public Works would have final review and approval of all Project plans to ensure that adequate drainage would be provided to accommodate Project flows. Therefore, the Project would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

With regard to polluted runoff, construction of the Project would occur in compliance with erosion control imposed via grading permit regulations. The Project would implement BMPs consistent with the NPDES permit to reduce pollution in stormwater discharge to levels that comply with applicable water quality standards. A SWPPP would also be prepared in accordance with the California General Construction Activity Stormwater permit. In addition, in accordance with requirements of the City's Low Impact Development Ordinance, BMPs would be implemented throughout the operational life of the Project to ensure that stormwater pollution is addressed. Such BMPs would include the placement of filters in catch basins to capture debris, oil, and other pollutants. As such, the Project would not result in substantial additional sources of polluted runoff. Impacts would be less than significant, and no mitigation measures are required.

iv. impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year flood plain as mapped by the Federal Emergency Management Agency (FEMA) or by the City of Los Angeles.^{52,53} Thus, the Project would not place structures that would impede or redirect flood flows. No impacts would occur, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a flood hazard zone. With regard to tsunamis, the largest body of water near the Project Site is the Pacific Ocean, located approximately 7 miles southwest of the Project Site. In addition, the Project Site is not mapped by the City of Los Angeles Safety Element of the General Plan as an area potentially impacted by tsunami.⁵⁴ Therefore, due to its distance from the Pacific Ocean and its elevation above sea level, the Project Site would not be susceptible to tsunamis.

⁵² Federal Emergency Management Agency, Flood Insurance Rate Map No. 06037C1315F, Panel 1315 of 2350, September 26, 2008, <https://msc.fema.gov/portal/>, accessed June 28, 2018.

⁵³ Safety Element of the Los Angeles City General Plan, Exhibit F, City of Los Angeles, November 26, 1996.

⁵⁴ Safety Element of the Los Angeles City General Plan, Exhibit G, City of Los Angeles, November 26, 1996.

Seiches are large waves or oscillations initiated by an earthquake in enclosed bodies of water, such as a reservoir, storage tank, harbor, or lake. A seiche wave has the potential to overflow the sides of the containing basin to inundate adjacent or downstream areas. The Encino Reservoir is located approximately 2 miles northwest of the Project Site and the Upper Stone Canyon Reservoir and the Stone Canyon Reservoir are located approximately 1.4 miles southeast of the Project Site. However, the Project Site is not located within a potential inundation area associated with the Encino Reservoir, the Upper Stone Canyon Reservoir, or the Stone Canyon Reservoir, as indicated in the Safety Element of the City of Los Angeles General Plan.

Based on the above, the Project would not result in a risk of release of pollutants due to inundation. Impacts would be less than significant, and no mitigation measures are required.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Under Section 303(d) of the Clean Water Act, states are required to identify water bodies that do not meet their water quality standards. Biennially, the Los Angeles Regional Water Quality Control Board (LARWQCB) prepares a list of impaired waterbodies in the region, referred to as the 303(d) list. The 303(d) list outlines the impaired waterbody and the specific pollutant(s) for which it is impaired. All waterbodies on the 303(d) list are subject to the development of a Total Maximum Daily Load (TMDL). The Project Site is located within Ballona Creek Watershed. According to the State Water Resources Control Board (SWRCB), constituents of concern listed for the Ballona Creek Watershed under California's Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue and sediment), copper (dissolved), cyanide, lead, PCBs, silver, toxicity, trash, viruses (enteric), and zinc.

The County of Los Angeles, the City of Los Angeles, and all other cities in the Los Angeles Watershed are responsible for the implementation of watershed improvement plans or Enhanced Watershed Management Programs (EWMP) to improve water quality and assist in meeting the Total Maximum Daily Load (TMDL) milestones. The objective of the EWMP Plan for Ballona Creek is to determine the network of control measures (often referred to as best management practices) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices.

Potential pollutants generated by the Project would be typical of commercial and office land uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. Since the existing Project Site does not have any structural or LID BMPs to treat or infiltrate stormwater, implementation of the LID features proposed as part of the Project would result in an improvement in surface water quality runoff as compared to existing conditions. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for the Ballona Creek Watershed. With compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures are required. No further evaluation of this topic in an EIR is required.

Potential pollutants generated by the Project would be typical of school facilities and may include sediment, nutrients, pesticides, pathogens, metals, trash and debris, and oil and grease. The implementation of BMPs required by the City's LID Ordinance would target these pollutants that could potentially be carried in stormwater runoff. As such, the Project would not introduce new pollutants or an increase in pollutants that could conflict with or obstruct any water quality control plans for Ballona Creek.

Through compliance with existing regulatory requirements and implementation of LID BMPs, the Project would not conflict with or obstruct implementation of a water quality control plan or a sustainable groundwater management plan. Impacts would be less than significant, and no mitigation measures would be required.

Mitigation Measures

As provided above, the Project would not result in significant impacts to hydrology and water quality. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that impacts to hydrology would be less than significant with mitigation. As evaluated above, the Project would not result in significant impacts to hydrology and water quality. Therefore, the Project would not result in new impacts to hydrology and water quality when compared to the impacts set forth in the Original EIR and MND.

XI. LAND USE AND PLANNING

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project physically divide an established community?

No Impact. The Project Site is located within the Encino–Tarzana Community Plan Area of the City of Los Angeles. The Project Site is specifically located northwest of where Mulholland Drive crosses the San Diego (I-405) Freeway. Land uses surrounding the Project Site include single-family residences to the north, the Milken Community Middle School and Milken Community High School to the south and west, respectively, and the I-405 Freeway to the east. Additional educational facilities are also located further to the west along Mulholland Drive. In addition, the relatively steep topography within the perimeter of the Project Site generally provides a physical barrier between the Project Site and the residential and educational uses to the north and south and adjacent Mulholland Drive.

The Project would provide for the reconfiguration, rehabilitation, and expansion of existing educational facilities, construction of new buildings, redefinition of the existing open space and gardens, and reconfiguration of parking lots and athletic fields. In addition, all Project activity would occur within the boundaries of the existing School. No public roadways or sidewalks would be permanently closed or relocated and no separation of uses or disruption of access between land use types would occur. Rather, implementation of the Project would result in continued use of the Project Site for educational purposes and would be consistent in terms of use and general character with the surrounding uses. Therefore, implementation of the Project would not disrupt or divide the physical arrangement of an established community. No impacts would occur, and no mitigation measures are required.

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

Less Than Significant Impact. Several land use plans and regulatory documents guide development of the Project Site. Regional plans that are applicable to the Project Site include the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS), which addresses long-term regional transportation needs throughout its jurisdiction and the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP), which addresses attainment of state and federal ambient air quality standards throughout the South Coast Air Basin. At the local level, the Project Site is subject to the policies of the Encino–Tarzana Community Plan (Community Plan), which implements the land use policy standards of the City of Los Angeles General Plan, as well as the regulations of the Los Angeles Municipal Code, which governs land use through building standards and development restrictions. The Project Site is also within the Mulholland Scenic Parkway Specific Plan, which also regulates development at the Project Site.

Regional Plans

The Project Site is located within the SCAG planning area. SCAG is a joint-powers agency made up of 14 subregions covering six counties. The Project Site is located within the City of Los Angeles subregion. SCAG's 2016–2040 RTP/SCS, presents a long-term transportation vision through the year 2035 for the SCAG region. The 2016–2040 RTP/SCS provides a basic policy and program framework for long-term investment in the regional transportation system in a coordinated, cooperative, and continuous manner. The 2016–2040 RTP/SCS emphasizes sustainability and integrated planning and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. The 2016–2040 RTP/SCS goals that relate to the Project include: (1) maximize mobility and accessibility for all people and goods in the region; (2) ensure travel safety and reliability for all people and goods in the region; (3) preserve and ensure a sustainable regional transportation system; and (4) maximize the productivity of our transportation system. The Project would be consistent with these goals by expanding existing educational facilities in an area that is already served by public infrastructure and transportation. The Project would also allow for additional stacking space within the new parking area so the current highly choreographed daily carpool system can work more efficiently. Furthermore, the existing transportation system, which consists of several streets including Mulholland Drive and the I-405, provides safe and reliable travel opportunities to people all across the region. The Project's proximity to existing routes would maximize the productivity of the existing transportation system.

Based on the above, the Project would not conflict with the applicable goals and principles set forth in the 2016–2040 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant, and no mitigation measures are required.

Encino–Tarzana Community Plan

The Encino–Tarzana Community Plan includes two policies that directly relate to the development of educational facilities. The Community Plan also includes several policies that pertain to residential and commercial development. While these policies are not directed at educational facilities, some of the policies provide general guidance as to the preferred development characteristics in the community. Table 10 on page 93 lists the applicable policies with a brief discussion that identifies the relationship of the Project features to the policies. As indicated within Table 10, the Project would not conflict with the applicable policies of the Community Plan adopted for the purpose of avoiding or mitigating an environmental effect.

The Community Plan also includes general land use designations that are further defined and implemented through the Mulholland Scenic Parkway Specific Plan and the City of Los Angeles Municipal Code. The Community Plan designates the Project Site as Very Low II Residential and the Project Site is zoned RE-15-1-H. The LAMC allows educational facilities in the RE zone with a Conditional Use Permit, as discussed further below. Additionally, the Project would be consistent with the existing educational uses already within the Project Site and present in the Project vicinity, and which are allowed on portions of the Project Site by the Specific Plan.

Mulholland Scenic Parkway Specific Plan

The Project Site is located within the boundaries of the Mulholland Scenic Parkway Specific Plan. The Specific Plan designates areas along Mulholland Drive as being within the Institutional Use Corridor.⁵⁵ As defined by the Specific Plan, the Project Site is located within the Institutional Use Corridor, Inner Corridor, and the Outer Corridor.^{56,57} The Specific Plan expressly allows educational institutions, provided they are located within the Institutional Use Corridor, which, in regards to the Project Site, is substantially the same area as the Inner Corridor. However, the Existing CUP required development of existing campus facilities primarily in the Outer Corridor, which is where the Specific Plan now prohibits development of uses only permitted in the Institutional Use Corridor (i.e., educational institutions). The Existing CUP was approved many years before the Specific Plan was adopted. Therefore, the majority of the existing facilities are located within the Outer Corridor because the CUP prohibited development of structures within that portion of the Project Site located within the Inner Corridor/Institutional Use Corridor.

⁵⁵ This area is defined as the area parallel to and 500 feet northerly and 500 feet southerly of the Mulholland Drive right-of-way beginning on the west at the intersection of Mulholland Drive and the Centerline of Corda Drive and terminating on the east at the west line of the San Diego Freeway. Also, an area parallel to and 500 feet southerly of Mulholland Drive right-of way beginning on the west at the east line of the San Diego Freeway and terminating on the east at a line that is parallel to and 400 feet westerly of the centerline of Roscomare Road.

⁵⁶ The Inner Corridor is defined as the Mulholland Scenic Parkway right-of-way plus the additional area which extends 500 feet outwards from the outermost boundaries of the right-of-way.

⁵⁷ The Outer Corridor is defined as the area which lies between the Inner Corridor's outermost boundary and 0.5 mile outward from the right-of-way

Table 10
Project Consistency with Relevant Policies of the Encino–Tarzana Community Plan

| | |
|--|--|
| Policy 6-1.1: Explore creative alternatives for providing new school sites in the city, where appropriate. | Consistent. The Project would expand educational facilities within a site already served by existing educational facilities. |
| Policy 1-3.1: Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods. Policy 1-5.4: Require that any proposed development be designed to enhance and be compatible with adjacent development. Policy 2-1.3: Require that projects be designed and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses and development. Policy 2-4.1: Preserve community character, scale and architectural diversity. Policy 5-1.1: Encourage the retention of passive and visual open space which provides a balance to the urban development of the Plan Area. | Consistent. The Project would retain the Project Site's open space characteristics, while expanding educational facilities to accommodate existing enrollment. The Project Site's general vicinity is already developed with several educational institutions. Expanding and upgrading the property's educational facilities would not be out of character with the immediate area. Further, by continuing to enhance the open areas within the Project Site and integrating new low-rise buildings with existing buildings, the Project would be compatible with existing development. The expansion of existing development would also be integrated with the topography of the Project Site. |
| Policy 1-5.1: Limit development according to the adequacy of the existing and assured street circulation system within the Plan Area and surrounding areas. | Consistent. Nearby roadways would have sufficient capacity to accommodate the Project since the Project would only expand existing development and would not increase permitted enrollment. Specifically, as evaluated in Checklist Section XVII, Transportation, below, the Project would not exceed the significance threshold at any of the analyzed intersections and traffic impacts due to the Project would be less than significant. Further, the Project would allow for additional stacking space so the existing carpool system can function more efficiently. |
| Policy 1-5.2: Ensure the availability of adequate sewers, drainage facilities, fire protection services and facilities and other public utilities to support development within hillside areas. | Consistent. Drainage facilities, wastewater facilities, fire protection and other public services and utilities are in place to accommodate the Project. |
| Policy 1-5.3: Consider the steepness of the topography and suitability of the geology in any proposal for development within the Plan Area. | Consistent. The majority of the Project improvements would be located in areas that have been previously graded and are relatively level. The Project would include appropriate engineering design features to assure the Project Site is suitable for development. |
| <hr/> <p><i>Source: Eyestone Environmental, 2021.</i></p> | |

As described in Section 3, Project Description, of this Subsequent MND, the Project involves the reconfiguration, rehabilitation, and expansion of existing educational facilities, construction of new buildings, redefinition of the existing open space and gardens, and reconfiguration of parking lots and athletic fields. The proposed improvements are intended to modernize the campus and reconfigure aging facilities to incorporate current technologies into the classroom and provide separate artistic and athletic facilities. In addition, as part of the Project, new landscaping and landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors. As such, the Project would focus development within the existing campus footprint with the majority of such development occurring within

the Outer Corridor (where the existing facilities are concentrated). As the proposed improvements would generally occur outside the Inner Corridor/Institutional Use Corridor, the Project would require an exception to the Specific Plan for development of educational facilities within the Specific Plan's Outer Corridor.

A second Specific Plan exception is also required to allow a portion of the Project's proposed gymnasium to exceed the permissible height of 30 feet for an upslope lot within the Inner Corridor. The proposed Gymnasium Building would be 37 feet in height. The Specific Plan allows a maximum height of 30 feet in an upslope lot for any building located between 100 feet and 500 feet from the Mulholland Drive right-of-way. A portion of the Gymnasium Building would be located within the first 500 feet from Mulholland Drive. If the Gymnasium Building were located entirely outside the 500 foot line, the permissible height would be 40 feet. Under current conditions, the School's Gymnasium Building is located on the opposite side of campus (within the area defined as the Outer Corridor) and is used for both athletic and artistic purposes. The School's pool is located (and would generally remain) in the area proposed for the new Gymnasium Building. Currently, students engaged in swim courses or athletics must go across campus to use the existing gymnasium's locker room and changing facilities. The requested exception would allow the development of the Gymnasium Building at a height of 37 feet in lieu of the permitted 30 feet.

A Specific Plan exception is also required to allow grading of a prominent ridge in excess of 1,000 cubic yards. As previously described, a ridge, identified by the Mulholland Scenic Parkway Specific Plan as a prominent ridge, runs parallel from the School's entrance towards the east, along Mulholland Drive. A second prominent ridge is located to the north of the Project Site along Mulholland Place. The prominent ridge that runs parallel along a portion of Mulholland Drive is a steep slope, which rises 75 feet above Mulholland Drive and gently slopes 30 feet down towards the School on the opposite side. The ridge, as visible from Mulholland Drive remains in its natural state, with a few native plants. The ridge on the Curtis School side has been graded for drainage improvements that include v-channels (both parallel and perpendicular to the ridge) to control rainwater flow. In addition to the drainage channels, the backside of the prominent ridge (on the School side) has been graded and filled to develop an athletic field. As described in Section 3, Project Description, the Project proposes to relocate the existing athletic fields and parking lots to create a safer environment for the student population.

Based on the above, with approval of the Specific Plan exceptions to permit educational facilities in the Outer Corridor, a 7-foot height exception for a portion of the proposed Gymnasium Building, and grading of a prominent ridge, the Project would not conflict with the Specific Plan.

City of Los Angeles Municipal Code

The Project Site is zoned by the LAMC as RE-15-1-H (Residential Estate, Height District 1), which is a residential zone that allows educational institutions pursuant to a CUP. Existing facilities at the Project Site were developed pursuant to the Existing CUP, which allowed the construction of educational facilities and recreation and parking areas within 500 feet and 100 feet, respectively, from Mulholland Drive. Additionally, CUP 89-0763, issued April 12, 1990, allowed a student increase to 675 students and a faculty and staff increase to 68. The Project seeks to modify the existing educational facility. The Project requires the following land use approvals: Plan Approval to modify the Existing CUP to allow for the operation of the Project's new facilities and buildings, a Specific Plan exception to permit institutional uses within the Outer Corridor, a second Specific Plan exception to allow for the Project's Gymnasium Building of 37 feet to exceed the permissible height for an upslope lot of 30 feet, a third Specific Plan

exception to allow grading of a prominent ridge in excess of 1,000 cubic yards, site plan review, a Zoning Administrator’s Determination to allow the Project to exceed the number of retaining walls permitted under the Baseline Hillside Ordinance, a second Zoning Administrator’s Determination to permit grading activities in excess of the quantity permitted by-right under the Baseline Hillside Ordinance, and design review approval by the Director of Planning acting on the recommendation of the Mulholland Scenic Parkway Design Review Board. Compliance with all requirements of the approvals set forth above would ensure that the Project would not conflict with the requirements of the LAMC.

Mitigation Measures

As provided above, the Project would not result in significant impacts to land use and planning. Therefore, no mitigation measures are required.

Conclusion

As discussed in the Original EIR, impacts to land use and planning would be less than significant. As evaluated above, the Project would not result in significant impacts to land use and planning. Therefore, the Project would not result in new impacts to land use and planning when compared to the impacts set forth in the Original EIR and MND.

XII. MINERAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No mineral extraction operations currently occur on the Project Site. In addition, the Project Site has been developed with educational uses for decades, and thus the potential for uncovering mineral resources during Project construction would be remote. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey.^{58,59} The Project Site is

⁵⁸ City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Areas Containing Significant Mineral Deposits in the City of Los Angeles (Figure GS-1).

also not located within a City-designated oil field or oil drilling area.⁶⁰ Therefore, the Project would not result in the loss of availability of a mineral resource. No impacts to mineral resources would occur, and no mitigation measures are required.

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As discussed above in Checklist Question XII.a, the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey. Therefore, the Project would not result in the loss of a locally-important mineral resource recovery site. No impacts would occur, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in significant impacts to mineral resources. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that no significant impacts would occur with respect to mineral resources. As discussed above, the Project would not result in significant impacts to mineral resources. As such, the Project would not result in new impacts to mineral resources when compared to the impacts set forth in the Original EIR and MND.

XIII. NOISE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project result in: | | | | |
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

⁵⁹ State of California Department of Conservation, California Geologic Survey, Map of California Principal Mineral-Producing Localities 1990–2000.

⁶⁰ Los Angeles General Plan Safety Element, Exhibit E, Oil Field & Oil Drilling Areas, page 55 (November 1996).

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|------------------------------------|-------------------------------------|
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The following analysis evaluates the potential noise impacts at noise-sensitive land uses resulting from construction and operation of the Project. Supporting noise model worksheets are included in Appendix 6 of this Subsequent MND.

Applicable Noise Regulations

LAMC Section XI, *Noise Regulation* (hereafter referred to as the Noise Regulation), establishes regulations regarding allowable increases in noise levels. These regulations address activities associated with operation and construction of the Project.

The Noise Regulation establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulation, a noise level increase of 5 dBA over the existing ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance (for a total of 10 dBA above the existing ambient noise level) for noise sources occurring for more than 5 but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of 15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.⁶¹ This standard applies to all noise sources, with the exception of vehicles traveling on public streets and construction noise.

Ambient noise as defined by the Noise Regulation is the measured background noise level averaged over a period of at least 15 minutes. For purposes of determining whether or not a violation of the noise regulation is occurring, the sound level measurements of an offending noise shall be averaged over a minimum 15-minute duration and compared with existing background ambient noise levels (i.e., without the additional noise source). The background ambient noise is the greater of the actual measured ambient noise level or the City's presumed ambient noise level. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the background. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) minimum ambient noise level for residentially zoned

⁶¹ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

properties is 50 dBA, while the nighttime (10:00 P.M. to 7:00 A.M.) presumed minimum ambient noise level is 40 dBA.⁶² The presumed daytime minimum ambient noise level for commercially zoned properties is 60 dBA, while the nighttime presumed minimum ambient noise level is 55 dBA.

The City's Noise Regulation further limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA, measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.⁶³ The Noise Regulation also prohibits construction noise between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. and after 6:00 P.M. on Saturday, and at anytime on Sunday or a national holiday.⁶⁴

Noise due to vehicle theft alarm systems (car alarms) is regulated under Section 114.06 of the LAMC. The noise regulation states that "it shall be unlawful for any person to install, operate or use any vehicle theft alarm system that emits or causes the emission of an audible sound, which is not, or does not become, automatically and completely silenced within 5 minutes."⁶⁵

In addition to the previously described LAMC provisions, the City has established operational noise guidelines that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.⁶⁶

Table 11 on page 99 provides an illustration of land use compatibility for community noise sources. Noise levels for specific land uses, referred to as Community Noise Equivalent Levels (CNEL), are classified into four categories: (1) "normally acceptable"; (2) "conditionally acceptable"; (3) "normally unacceptable"; and (4) "clearly unacceptable." A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, parks, schools, and playgrounds.

Under these standards, changes in noise levels of less than 3 dBA are generally not discernible to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase. Therefore, the significance threshold for mobile source noise (e.g., on-road motor vehicles) is based on human perceptibility to changes in noise levels (increases), with consideration of existing ambient noise conditions and the City's land use noise compatibility guidelines.

⁶² Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

⁶³ In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

⁶⁴ Los Angeles Municipal Code, Section 41.40.

⁶⁵ Los Angeles Municipal Code, Section 114.06.

⁶⁶ State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

Table 11
Land Use Compatibility for Community Noise Sources

| Land Use Category | | Noise Exposure (L _{dn} or CNEL, dBA) | | | | | |
|---|---|---|----|----|----|----|----|
| | | 55 | 60 | 65 | 70 | 75 | 80 |
| Residential—Single-Family, Duplex, Mobile Home | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Residential—Multiple Family | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Transient Lodging—Motel, Hotel | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| School, Library, Church, Hospital, Nursing Home | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Auditorium, Concert Hall, Amphitheater | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Sports Arena, Outdoor Spectator Sports | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Playground, Neighborhood Park | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Golf Course, Riding Stable, Water Recreation, Cemetery | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Office Building, Business Commercial and Professional | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| Industrial, Manufacturing, Utilities, Agriculture | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | NORMALLY ACCEPTABLE: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements. | | | | | | |
| | CONDITIONALLY ACCEPTABLE: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. | | | | | | |
| | NORMALLY UNACCEPTABLE: New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design. | | | | | | |
| | CLEARLY UNACCEPTABLE: New construction or development should generally not be undertaken. Construction costs to make the indoor environmental acceptable would be prohibitive and the outdoor environment would not be usable. | | | | | | |
| Source: State of California, General Plan Guidelines, Governor's Office of Planning and Research, 2003. | | | | | | | |

Based on the Noise Regulation and the City's noise guidelines, the Project would result in a significant noise impact if:

- Unless compliance with this limitation is technically infeasible, construction-related noise levels exceed 75 dBA (L_{eq}) at distance of 50 feet from where the equipment is operating when construction activities are located within 500 feet of residences;

- Construction-related on-site noise levels and construction-related off-site haul trucks increase the ambient noise at adjacent sensitive receptors by 5 dBA (L_{eq}) or more;
- Project-related on-site stationary sources (e.g., stationary mechanical equipment and vehicles other than those traveling on public streets) during project operations increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA; or
- Project-related off-site traffic generated during project operations increases ambient noise levels along roadway segments adjacent to sensitive receptors by 3 dBA (CNEL) or more resulting in a change in the community noise classification or by 5 dBA (CNEL) or more if project operations do not degrade community noise levels beyond the “conditionally acceptable” category.

Existing Noise Environment

Noise in the Project area is dominated by traffic on I-405 and to a lesser extent Mulholland Drive. Other noise sources include landscape maintenance activities, mechanical equipment from buildings, occasional aircraft flyovers and outdoor student activities at Curtis School and at the several other schools surrounding the Project Site.

Noise-sensitive receptors in the vicinity of the Project Site were identified based on the relative distance from the receptors to the Project Site (i.e., within 500 feet), in accordance with LAMC Section XI. Existing noise receptors that represent sensitive uses within 500 feet of the Project Site include residential uses north of Mulholland Place (receptor R1) and educational uses south of Mulholland Drive across from the Project Site, including; the Milken Community Schools, Saperstein Middle School Campus (receptor R2) and Upper High School Campus (receptor R3). It is noted that the Project Site is also considered a noise sensitive land use. Noise receptor locations are illustrated in Figure 6 on page 101.

The existing ambient noise levels at the nearby noise sensitive receptors and the Project Site were measured on February 27, 2020, using a Quest Technologies Model 2900 Sound Level Meter. In addition, the existing ambient noise level was also measured at the Project Site, near the future Science Building. A 15-minute ambient measurement was conducted at each of the receptor location between 9:00 A.M. and 11:00 A.M. The ambient noise measurements were taken in accordance with the City’s standards, which require ambient noise to be measured over a period of 15 minutes.⁶⁷ The measured existing ambient noise levels were 53.3 dBA (L_{eq}), 64.3 dBA (L_{eq}), and 67.5 dBA (L_{eq}) at receptors R1 (residential), R2 (Saperstein Middle School), and R3 (Upper High School), respectively. The existing ambient noise level at the future Science Building was 55.9 dBA (L_{eq}). The measured existing ambient noise levels at the nearby noise sensitive receptors currently exceed the City’s presumed daytime ambient noise standard of 50 dBA (L_{eq}) for residential zone. Therefore, consistent with the LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

⁶⁷ City of Los Angeles, LAMC Section 111.01.



Figure 6
Noise Measurement Locations

Construction Noise

As described above in Checklist Question III.b, the proposed improvements are assumed to be implemented in two main phases. No overlap is anticipated between the two main phases. For the purpose of identifying potential construction-related noise impacts, this analysis addressed construction within Phase II at the shortest distance between the closest construction activity and a sensitive land use. This approach avoids using the center of construction for a much larger area, and results in a shorter distance between noise source and receptor and is, thus, a more conservative approach. It should be noted that the construction noise level is not dependent on the year of the activity.

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, the equipment location, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Noise from the construction activities would be generated by vehicles and equipment during various stages of construction, including demolition, site grading and excavation, and building foundation and vertical construction.

Table 12 on page 103 provides noise levels associated with each stage of construction. These estimated construction noise levels are based primarily on high noise-producing pieces of equipment and represent conservative conditions in which a large amount of construction equipment would be operating during a 1-hour period. These conservative noise level estimates represent peak noise levels and would not be continuous throughout the construction period. As indicated in Table 12, due to the type of construction equipment proposed, the highest level of construction noise would be expected to occur during the excavation and grading stage, with an equivalent sound level (L_{eq}) as high as 86 dBA at 50 feet from the center of construction activity.

The hourly average (L_{eq}) noise levels associated with proposed construction were calculated for the nearest noise-sensitive receptors surrounding the Project Site (residential uses north of Mulholland Place and Milken Community Schools, Middle and High School Campuses south of Mulholland Drive across from the Project Site). The construction noise level at each of the sensitive receptor locations was calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance and also included barrier insertion loss for intervening topography, where applicable. Table 13 on page 104 provides the estimated construction noise levels at nearby noise sensitive receptors and a comparison with the noise impact criteria. As indicated in Table 13, noise sensitive land uses in close proximity to the Project Site would not be exposed to construction-related noise levels in excess of 5 dBA (L_{eq}) above the measured ambient noise levels. Therefore, noise impacts would be less than significant.

In addition to on-site construction noise, mobile noise from delivery/haul trucks and construction workers requiring access to the Project Site during the Project's construction phase would occur. Delivery and haul trucks would generally access the Project Site via Mulholland Drive, connecting to the regional freeway system (i.e., I-405 Freeway). As there are educational uses along Mulholland Drive which have direct line-of-sight to the truck route, these receptors would experience temporary, instantaneous noise levels up to 76 dBA at 50 feet from the roadway due to a single pass-by of a haul truck.⁶⁸ This noise impact would be temporary and instantaneous as trucks pass by these receptors, and the truck noise

⁶⁸ FHWA, Construction Noise Handbook, PB 20006-109102, 2006.

Table 12
Outdoor Construction Noise Levels

| Construction Phase | Noise Levels at 50 feet with Mufflers^a L_{eq} (dBA) |
|--|---|
| Demolition | 82 |
| Excavation, Grading | 86 |
| Foundations | 77 |
| Structural | 83 |
| Finishing | 85 |
| ^a Noise levels reflect EPA's referenced noise levels for construction of institutional uses. Source: EPA, <i>Noise from Construction Equipment and Operations, Building Equipment and Home Appliances</i> , PB 206717, 1971. | |

would rapidly diminish as the trucks travel away from the receptors. An average of 20 truck trips per hour could occur on a peak day of construction and would be representative of export requirements during the relocation of the existing athletic fields and the parking lot. Noise generated by construction trucks along the roadways leading to the Project Site would be approximately 62 dBA (hourly L_{eq}), which would be below the existing ambient noise level of 64.3 dBA (L_{eq}), as measured at receptor R1 along Mulholland Drive. As such, off-site construction traffic noise impacts would be less than significant, and no mitigation measures are required.

Operational Noise

Traffic Noise

As previously discussed, while the proposed improvements are intended to serve the Curtis School student population with no increase in currently permitted enrollment, a total of approximately 50 additional faculty and staff members over currently permissible faculty and staff could be employed, which could result in an additional 196 daily vehicular trips.⁶⁹ In general, roadway volumes have to double to produce an audible 3 dBA change in roadway noise. Existing traffic counts along Mulholland Drive near the Project Site are approximately 20,500 trips per day.⁷⁰ An increase of approximately 196 daily vehicular trips would represent a small increase in daily trips along Mulholland Drive and would be well below the doubling of traffic volume that could potentially exceed the 3 dBA (CNEL) significance threshold. The estimated increase in noise levels from the 50 additional faculty and staff members along

⁶⁹ It was conservatively assumed that the added employees would contribute a total of 54 trips during the A.M. and P.M. peak hours. A review of the general urban/suburban trip generation rates for Land Use Code 715, Single Tenant Office Building, from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition, indicates this use generates 3.625 times as many trips on a daily basis as it does during the combined A.M. and P.M. peak hours of the generator [3.77 daily trips per employee / (0.53 A.M. trips per employee + 0.51 P.M. trips per employee)]. This would be considered an appropriate peak-to-daily trip ratio to apply for school employees, given that single tenant office buildings experience trips mostly by employees during the peak hours and their arrival/departure patterns are grouped. Applying this ratio of 3.625 to the 54 combined peak-hour trips for the added school employees yields a daily trip estimate of 196 trips.

⁷⁰ Ibid.

Table 13
Construction Noise Impacts—New Construction

| Phase and Receptor Location | Nearest Distance to Project Construction Site (feet) | Distance Attenuation, ^a Leq (dBA) | Construction Noise Level, ^b Leq (dBA) | Measured Ambient Noise Level, Leq (dBA) | Significance Threshold, ^c Leq (dBA) | Significant Impact? |
|---|--|---|---|--|---|---------------------|
| Phase 1 | | | | | | |
| R1—Residential | 325 | -16.3 | 54.7 | 53.3 | 58.3 | No |
| R2—Milken MS | 1,400 | -28.9 | 42.1 | 64.3 | 69.3 | No |
| R3—Milken HS | 930 | -25.4 | 45.6 | 67.5 | 71.5 | No |
| Phase 2 | | | | | | |
| R1—Residential | 350 | -16.9 | 54.1 | 53.3 | 58.3 | No |
| R2—Milken MS | 450 | -19.7 | 51.9 | 64.3 | 69.3 | No |
| R3—Milken HS | 275 | -14.8 | 56.2 | 67.5 | 71.5 | No |
| <p>^a Calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance.</p> <p>^b Includes a barrier insertion loss of 15 dBA for residential uses north of Mulholland Place and sensitive uses south of Mulholland Drive to account for intervening topography between construction activities and the receptor.</p> <p>^c Significance threshold is based on the L.A. CEQA Thresholds Guide for construction activities lasting longer than 10 days in a three-month period, as not to exceed the ambient plus 5 dBA.</p> <p>Source: Eyestone Environmental, 2020; AES, 2021.</p> | | | | | | |

this roadway segment is less than 0.1 dBA (CNEL). Therefore, the Project would not exceed the significance thresholds for future roadway noise.

On-Site Noise

As discussed above, the proposed improvements within the Curtis School campus would include swapping the location of the existing athletic fields and the parking lot, reconfiguration of the swimming pool and outdoor play areas, new buildings and classroom space, and an indoor theater. Existing enrollment caps would be maintained as part of the Project and, therefore, an increase in outdoor student activities or intensity of outdoor uses is not anticipated. It should be noted that the natural topography in the vicinity of the Project Site provides a substantial noise buffer between the Project Site and nearby sensitive land uses. With respect to noise sensitive land uses south of Mulholland Drive, intervening topographical features (i.e., natural slope along the north side of Mulholland Drive and change in elevation) would be equivalent to a 30-foot (or higher) earthen berm and would provide at least 15 dBA of barrier insertion loss. With respect to residential uses north of Mulholland Place north of the Project Site, the natural slope along the north side of the Project Site and the ridge line along Mulholland Place would be equivalent to a 25-foot (or higher) earthen berm and would provide approximately 15 dBA of barrier insertion loss.

Athletic Field and Parking Lot Reconfiguration

The swapping of the athletic fields and parking lot would result in relocating the athletic fields more interior to the Project Site (i.e., further away from sensitive land uses). Given that the intensity of use of the athletic fields would not change and that the athletic fields are the predominate noise source in comparison to the parking lot, predicted noise levels at nearby sensitive land uses would not result in a significant noise impact.

Swimming Pool and Outdoor Play Area Reconfiguration

The reconfiguration of these uses would not substantially change the overall area of these uses or the intensity in which they are used. In addition, the Project would not result in new outdoor activity areas substantially closer to noise sensitive land uses. As an example, the swimming pool would be moved slightly further south away from residential uses north of Mulholland Place, but slightly closer to noise sensitive land uses across Mulholland Drive. However, the swimming pool would replace an area currently used for parking and a basketball court and substantial intervening topography would separate the noise sensitive land uses across Mulholland Drive from the Project Site. Therefore, the reconfiguration of these uses is not anticipated to change noise levels at nearby sensitive land uses and would result in a less than significant noise impact.

New Buildings and Classroom Space

The operation of mechanical equipment such as air conditioners, fans, and related equipment may generate audible noise levels. However, the Project's mechanical equipment would be shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound screen/parapet walls, to comply with the noise limitation requirements set forth in the LAMC. Therefore, the operation of mechanical equipment would not exceed the Project thresholds of significance and impacts would be less than significant. As such, no mitigation measures are required.

Based on the above, long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site.

Noise/Land Use Compatibility Impacts

The Project would include new buildings and classroom space closer to I-405, which could potentially expose students attending Curtis School to an increase in noise levels. As presented above, the measured ambient noise level at the future Science Building (located nearest to the I-405 Freeway) was 55.9 dBA (L_{eq}), which would be below the Caltrans exterior noise standards of 67 dBA (L_{eq}) for school

use.⁷¹ In addition, the new building construction would provide minimum 25 dBA exterior to interior noise reduction, which would reduce the exterior noise level to approximately 31 dBA (L_{eq}). The estimated

⁷¹ Caltrans, Traffic Noise Analysis Protocol, Table 1. Activity Categories and Noise Abatement Criteria (23CFR772), May 2011.

interior noise level at the future building would be below interior noise limit of 52 dBA (L_{eq}) and 50 dBA (L_{eq}), as specified by Caltrans and CalGreen, respectively.⁷²

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. The City does not address vibration in the Los Angeles Municipal Code or in the Noise Element of the General Plan. According to the Federal Transit Administration, ground vibrations from construction activities very rarely reach the level capable of damaging structures.⁷³ The construction activities that typically generate the most severe vibrations are blasting and impact pile driving. The Project would be constructed using standard construction techniques and no blasting or impact pile driving is anticipated. Heavy construction equipment (e.g., bulldozers, scrapers, excavators, compactors, and motor graders) would generate a limited amount of ground-borne vibration during construction activities at a short distance away from the source. Post-construction on-site activities would be limited to typical institutional uses that would not generate excessive ground-borne noise or vibration. As such, ground-borne vibration and noise levels associated with the Project would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip. The nearest airport is the Van Nuys Airport, located approximately 5 miles north of the Project Site. Therefore, the Project would not expose people to excessive noise levels from airport activities. No impact would occur, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in significant impacts associated with noise. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that potential noise impacts would be reduced to a less than significant level with implementation of design features. As discussed above, noise impacts associated with construction and operation of the Project would be less than significant. Therefore, the Project would not result in new impacts related to noise when compared to the impacts set forth in the Original EIR and MND.

⁷² California Code of Regulations, Title 24, Part 11, 2016 California Green Building Standards Code, Section 5.507, 2016.

⁷³ U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 1995

XIV. POPULATION AND HOUSING

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

Less Than Significant Impact. The Project does not involve the development of new residences. As such, implementation of the Project would not generate a direct increase in the permanent population of the area or cumulatively exceed official regional or local population projections. However, construction of the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, Project-related construction workers would not be anticipated to relocate their household's place of residence as a consequence of working on the Project and, therefore, no new permanent residents would be expected to be generated during construction of the Project. In addition, in connection with the Project, permitted enrollment for Curtis School would not be increased and would remain consistent and comply with the Existing CUP, which allows a maximum enrollment of 675 students. While a total of approximately 50 additional faculty and staff members could be employed, this increase in employment would be well within the existing employment projections for the community and region. Any housing needs associated with this increase in employment are anticipated to be accommodated by existing vacancies in the housing stock. Moreover, infrastructure would only be expanded to the extent that it is needed to serve the Project Site. Thus, any necessary expansions of infrastructure would not indirectly induce population growth in the area. As such, potential impacts associated with induced population growth would be less than significant, and no mitigation measures are required.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project Site is currently developed with educational buildings, athletic facilities, parking, headmaster's house, landscaped areas, and support facilities (i.e., guard house and maintenance). Land uses surrounding the Project Site include single-family residences to the north, Stephen S. Wise Temple Middle and High schools to the south and west across Mulholland Drive and the I-405 to the east. The Project would not remove the headmaster's house located within the Project Site or other housing in the vicinity of the Project Site. As such, the Project would not displace any existing people or housing.

Therefore, no impact with respect to housing displacement would occur, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in significant impacts related to population and housing. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that no significant impacts related to population and housing would occur. As discussed above, the Project would not result in significant impacts associated with population and housing. As such, the Project would not result in new impacts with regard to population and housing when compared to the impacts set forth in the Original EIR and MND.

XV. PUBLIC SERVICES

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

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|-----------------------------|--------------------------------------|--|-------------------------------------|--------------------------|
| a. Fire protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Police protection? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Schools? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?

Less Than Significant Impact. Fire protection and emergency medical services are provided to the Project Site by the Los Angeles Fire Department (LAFD). The Project Site is located within Battalion 10,

Division 3 of the LAFD.⁷⁴ The “first-in” LAFD fire station for the Project Site is the Encino Hills Fire Station No. 109, located at 16500 Mulholland Drive, approximately 0.8 mile west of the Project Site.

The Project Site is located within a Very High Fire Hazard Severity Zone, as defined in the City of Los Angeles Municipal Code. All projects located within a Very High Fire Hazard Severity Zone must comply with the requirements set forth for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include the use of fire resistant plants and materials, the regular clearing of brush, and greenbelt standards. With implementation of these requirements, impacts associated with wildland fires would be less than significant.

As previously described, short-term Project construction activities and the staging of construction equipment would primarily occur within the existing Curtis School campus. Emergency access to the Project Site during construction would be maintained via Mulholland Drive, Walt Disney Drive, and Mulholland Place. Project construction activities would also not impede access to other nearby uses. Furthermore, the Project would implement a Construction Staging and Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project vicinity. Therefore, construction activities would not interfere with LAFD emergency access or affect LAFD response.

While the proposed improvements are intended to serve the Curtis School student population with no increase in enrollment levels permitted by the Existing CUP, a total of approximately 50 additional faculty and staff members could be employed. In addition, it is possible that several of the additional employees may relocate their household’s place of residence as a consequence of working at the School. Therefore, the Project could increase the service population of Fire Station No. 109 and associated calls for LAFD services. However, based on the nature of school operations; the minor increase in the daytime population within the Project Site; and the potential increase in the permanent population within the service area of Fire Station No. 109, the Project would not substantially affect LAFD’s capability to provide adequate fire protection services to the Project Site and to its service area. Furthermore, access to the Project Site is and would continue to be provided from Walt Disney Drive via Mulholland Drive. Additionally, the LAFD would conduct a review of Project plans prior to approval to ensure that adequate fire safety features would be incorporated into the Project. Based on the above, existing fire service levels in the area would not be affected.

Water for fire protection would be provided from existing fire hydrants. In addition, the Project would comply with applicable provisions of the City’s Fire Code (Chapter V, Article 7 of the LAMC) and Building Code, including the installation of fire sprinklers, water line improvements, and connections in new buildings, as required, as well as the provision of sufficient emergency access and fire lane widths to ensure that fire suppression and access would be adequate to serve the Project. Additional Project specific requirements, if required, would be determined by the LAFD during the building permit plan check process.

As evaluated above, Project compliance with regulatory requirements, including approval of the Project plot plan by the Fire Department during the building permit plan check process for the Project and

⁷⁴ City of Los Angeles, Department of City Planning, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 12, 2018.

provision of adequate connections to meet the fire flow required by the LAFD, impacts with respect to fire protection would be less than significant.

b. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services?

Less Than Significant Impact. Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located in Reporting District 1099 within the jurisdiction of the LAPD's Valley Bureau and is served by the West Valley Community Police Station located at 19020 Vanowen Street in Reseda.⁷⁵ This station has a service area encompassing 33.5 square miles with a population of 196,840 people.⁷⁶

As described above, short-term Project construction activities and the staging of construction equipment would primarily occur within the existing Curtis School campus. Therefore, emergency access to the Project Site during construction would be maintained via Mulholland Drive, Walt Disney Drive, and Mulholland Place. Project construction activities would also not impede access to other nearby uses. Furthermore, the Project would implement a Construction Staging and Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project vicinity. Therefore, construction activities would not interfere with emergency police access or affect police response times.

As described above, while the Project is intended to serve the Curtis School student population with no increase in enrollment levels allowed by the Existing CUP, a total of approximately 50 additional faculty and staff members could be employed. A fraction of the approximately 50 additional faculty and staff members may relocate their household's place of residence as a consequence of working at the School. Therefore, the Project would increase the service population of the West Valley Community Police Station and associated calls for LAPD services. However, based on the minor increase in the daytime population within the Project Site and the even smaller potential permanent population, the Project would not substantially affect LAPD's capability to provide police protection services. In addition, the Project would not result in the permanent closure of any local public streets and access to the Project Site would continue to be provided from Walt Disney Drive via Mulholland Drive. Moreover, new and renovated facilities resulting from implementation of the Project would include the implementation of security features such as security lighting, which would be consistent with that currently occurring on-site. Thus, impacts with respect to police protection would be less than significant, and no mitigation measures are required.

c. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?

⁷⁵ City of Los Angeles, Department of City Planning, Parcel Profile Report, <http://zimas.lacity.org/>, accessed June 12, 2018.

⁷⁶ Los Angeles Police Department, About West Valley, www.lapdonline.org/west_valley_community_police_station/content_basic_view/1616, accessed June 12, 2018.

Less Than Significant Impact. The Project Site is located within the West Local District of the Los Angeles Unified School District (LAUSD).⁷⁷ The Project would not result in the development of residential uses and, as such, would not generate new students in the LAUSD. Rather, the Project would be expected to continue to reduce the demand for public schools through the provision of continued educational services within the community. In addition, permitted enrollment for Curtis School would not be increased and would remain consistent and comply with the Existing CUP, which permits a maximum enrollment of 675 students. Therefore, the Project would not introduce a new population of school age students that could affect school capacity levels within local LAUSD schools. Thus, the Project would not result in a direct impact to schools.

As previously described, a total of approximately 50 additional faculty and staff members could be employed. It is possible that a portion of these employees may relocate their household's place of residence as a consequence of working at the School. Therefore, the Project could indirectly generate a new population of school age students. However, some of these students may attend Curtis School or one of the many other private and public educational institutions within the vicinity of the Project Site. In addition, based on the minor increase in additional faculty and staff and the small fraction that would actually relocate their household's place of residence, it is anticipated that the Project would not substantially affect existing capacity levels within LAUSD schools in the vicinity of the Project Site or result in the need for additional school facilities. Furthermore, in accordance with Section 65995 of the Government Code, governing boards of school districts shall establish fees to offset costs associated with school facilities made necessary by new construction. Payment of these fees is required prior to issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to less than significant levels.

Based on the above, operational impacts on schools would be less than significant, and no mitigation measures are required.

d. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for park services?

Less Than Significant Impact. The Project would not result in the development of residential uses. As such, no new residential population that would increase the demand for parks and recreational facilities would be generated. Furthermore, the Project is intended to serve Curtis School students with no expansion in permitted enrollment. Thus, no new direct demand for parks and recreational facilities would be expected to occur.

As noted above, a total of approximately 50 additional faculty and staff members could be employed. While it is possible that some of these employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access

⁷⁷ Los Angeles Unified School District, About LAUSD, LAUSD Maps, Local Districts with Index, <https://achieve.lausd.net/domain/34>, accessed June 12, 2018.

off-site local parks and the availability of private on-site open space and recreational amenities. In addition, the 50 additional faculty and staff members that could be employed may be filled to some extent by employees already residing in the vicinity of the Project Site who already utilize existing nearby parks and recreational facilities and who are already accounted for in the parkland to population ratios of the Encino–Tarzana Community Plan area. In addition, as part of the Project, new landscaping and landscaped gardens, and walkways would be located throughout the Project Site. Through the creation of such open space areas, the buildings and the landscape of Curtis School would be integrated to provide for clearly defined pathways and an improved campus experience for students, staff, and visitors, thereby offsetting the demand for off-site parks and recreational facilities. It is also possible that some of these jobs could result in persons relocating to the surrounding area, thereby causing an indirect demand on local parks and recreational facilities. However, given the limited number of persons that could potentially relocate, the Project would not substantially reduce the ratios of parkland to population in the Community Plan area. Therefore, Project operation would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area. Therefore, impacts on parks would be less than significant, and no mitigation measures are required.

e. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Less Than Significant Impact. Other governmental services that could potentially be impacted include roads and libraries. The Project proposes the reconfiguration, rehabilitation, and expansion of existing educational facilities, construction of new buildings, redefinition of the existing open space and gardens, and reconfiguration of parking lots and athletic fields. The proposed improvements are intended to modernize the campus and reconfigure aging facilities to incorporate current technologies into the classroom and provide separate artistic and athletic facilities. The Project does not propose the permanent closure of any local public streets and access to the Project Site would continue to be provided from Walt Disney Drive via Mulholland Drive. In addition, any additional trips resulting from the increase in faculty and staff would be minimal and would not require the construction or extension of roads. Therefore, impacts on roads would be less than significant, and no mitigation measures are required.

Library services within the Project area are provided by the City's Public Library (LAPL). The closest public library to the Project Site is the Sherman Oaks Library located at 14245 Moorpark Street in Sherman Oaks.⁷⁸ The existing Curtis School campus currently provides a library that is available to students and staff. The existing library would be anticipated to accommodate the demand for library services subsequent to implementation of the Project, particularly since the Project would not result in an increase in the student enrollment permitted by the Conditional Use Permit. In addition, as no residential uses would be developed as part of the Project, no new residents would be generated on-site. Thus, implementation of the Project would not result in a direct increase in the number of residents who may utilize the Sherman Oaks Library. New employment at the Project Site would generate a demand for

⁷⁸ Los Angeles Public Library, Locations & Hours, www.lapl.org/branches, accessed June 28, 2018.

library services, but to a much lesser extent. As described above, it is estimated that a total of approximately 50 additional faculty and staff members could be employed. A portion of these employees may utilize library services, either stopping by on their way to or from work to utilize borrowing privileges, or stopping by the library during their lunch hour. However, this increased demand would be negligible due to the amount of time it would take for employees to access the nearby library (which is located approximately 2.5 miles from the Project Site). Consequently, employment at the Project Site would not result in a substantial degradation of library services. Furthermore, while the Project's employment opportunities would have the potential to indirectly increase the residential population of the Encino–Tarzana Community Plan area, such an increase would be minimal and the associated new demand for library facilities would be limited. Therefore, Project operation would not generate a demand for library facilities that would exceed the capacity of the local libraries to adequately serve the existing residential population. Impacts on library facilities during Project operation would be less than significant, and mitigation measures are not required.

Mitigation Measures

As provided above, the Project would not result in significant impacts to public services. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that no significant impacts to public services would occur. As discussed above, the Project would not result in significant impacts to public services. Therefore, the Project would not result in new impacts to public services when compared to the impacts set forth in the Original EIR and MND.

XVI. RECREATION

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. The Project would not result in the development of residential uses. As such, no new residential population that would increase the demand for parks and recreational facilities

would be generated. Furthermore, the Project is intended to serve the Curtis School student population with no expansion in permitted enrollment. Thus, no new direct demand for parks and recreational facilities would be expected to occur.

As part of the Project, a total of approximately 50 additional faculty and staff members could be employed. While it is possible that some of these employees may utilize local parks and recreational facilities, this increased demand would be negligible due to the amount of time it would take for employees to access off-site local parks and the availability of private on-site open space and recreational amenities. In addition, the 50 additional jobs may be filled to some extent by employees already residing in the vicinity of the Project Site who already utilize existing nearby parks and recreational facilities and who are already accounted for in the parkland to population ratios of the Encino–Tarzana Community Plan area. In addition, the existing Curtis School campus includes multi-purpose athletic fields and courts and a pool available for student recreation. Furthermore, in addition to new landscaping and landscaped gardens, and walkways that would be located throughout the Project Site, the Project proposes a new Gymnasium Building that would provide space for athletics classes, practice, and games, thereby offsetting the demand for off-site parks and recreational facilities. However, it is also possible that some of the new employees could relocate to the surrounding area, thereby causing an indirect demand on local parks and recreational facilities. Nonetheless, given the limited number of persons that could potentially relocate, the Project would not substantially reduce the ratios of parkland to population in the Community Plan area. Therefore, Project operation would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, or interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project area. Impacts on such facilities would be less than significant, and no mitigation measures are required.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant With Mitigation Incorporated. As part of the Project, the existing athletic fields within the Curtis School campus would be relocated to the location of the existing surface parking area. This construction would occur within the existing campus footprint, within an area that has already been disturbed as part of the existing campus development. As evaluated in response to the sections above and below, the physical impacts associated with the Project, including this improvement, have been evaluated in this Subsequent MND. With implementation of the mitigation measures identified throughout this Subsequent MND, impacts associated with the relocation of the athletic fields and the remaining Project improvements would be less than significant.

Mitigation Measures

As provided above, the Project would not result in impacts to recreation. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that no significant impacts to recreation would occur. As discussed above, the Project would not result in significant impacts to recreation. As such, the Project would not result in new impacts to recreation when compared to the impacts set forth in the Original EIR and MND.

XVII. TRANSPORTATION

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| Would the project: | | | | |
| a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The following analysis is based, in part, on the Trip Generation Assessment and Construction Analysis (Transportation Assessment), prepared by Crain and Associates, dated October 1, 2020, and included as Appendix 7 of this Subsequent MND. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (July 2019). The scope of analysis for this Transportation Assessment was developed in consultation with LADOT. LADOT reviewed and approved the Transportation Assessment as provided in their conformance letter also included in Appendix 7 of this Subsequent MND. The Transportation Impact Study prepared March 1, 2018, and included in Appendix 8 of this Subsequent MND is also referenced below for informational purposes only.

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. As discussed in the Transportation Assessment, in July 2019, LADOT updated the City's Transportation Assessment Guidelines to conform to the requirements of Senate Bill 743. The Transportation Assessment Guidelines replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act from level of service (LOS) to vehicle miles traveled (VMT). Table 2.1-1 in the Transportation Assessment Guidelines lists Citywide plans, policies, and programs that could apply to a project, including, but not limited to, Mobility Plan 2035, Plan for a Healthy Los Angeles, Community Plans, Vision Zero, the Walkability Checklist, Specific Plans, and the LAMC. The Project's potential to conflict with applicable programs, plans, ordinances, and policies is analyzed below. The Project's consistency with applicable policies of the Mulholland Scenic Parkway Specific Plan, Citywide Urban Design Guidelines, and City Walkability Checklist is provided above in Checklist Section I, Aesthetics.

Mobility Plan 2035

The Mobility Plan combines “complete street” principles with the following five goals that define the City’s mobility priorities:

1. Safety First
2. World Class Infrastructure
3. Access for all Angelenos
4. Collaboration, Communication, and Informed Choices
5. Clean Environments and Healthy Communities

The Project location and site access are consistent with the goals of the Mobility Plan as the Project does not require any dedications or improvements along the streets adjacent to the Project Site perimeter to serve the long-term mobility needs identified in Mobility Plan 2035. In addition, the Project does not propose repurposing existing curb space and does not propose narrowing or shifting existing sidewalk placement or paving, narrowing, shifting, or removing an existing parkway. Further, the Project does not propose modifying, removing, or otherwise affecting existing bicycle infrastructure, and the Project driveways are not proposed along a street with a bicycle facility. The Project would meet the goals of the Mobility Plan and would not interfere with any other policies of the Mobility Plan. Thus, the Project would be consistent with the Mobility Plan.

Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles lays the foundation to create healthier communities for all Angelenos. As an Element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City’s future growth and development. Applicable policies related to the Project include: promoting a healthy built environment by encouraging the design of buildings for healthy living, including promoting enhanced pedestrian-oriented circulation and healthy building materials; and supporting strategies that make schools center of health and well-being by creating economic, environmental, social, and physical conditions in and around local schools that are safe, abundant in healthy goods and services, and offer opportunities for physical activity and recreation. As discussed in Section 3, Project Description, of this Subsequent MND, the Project is intended to modernize the campus and reconfigure aging facilities to incorporate current technologies into the classroom and to provide for separate artistic and athletic facilities. Specifically, the Project includes a hierarchy of open spaces that would define “academic neighborhoods” by organizing classrooms within one area, clustering the arts around the existing Multi-use Pavilion, and locating the athletic facilities next to the athletic fields and ball courts. The proposed improvements would provide permanent and upgraded facilities to accommodate the educational needs of up to 675 school students (the current capacity limit authorized by the Existing CUP). Therefore, the Project would not conflict with any other policies recommended by the plan.

Encino–Tarzana Community Plan

The Project would not conflict with applicable policies of the Community Plan regarding the circulation system. In particular, the Project would not conflict with Policy 13-1.4, which provides that new development projects be designed to minimize disturbance to existing traffic flow with proper ingress and egress to parking. Similarly, the Project would not conflict with Policy 13-2.2, which requires driveway access points onto arterial and collector streets be limited in number and be located to insure a smooth, and safe flow of motor vehicles and bicycles. As discussed in Section 3, Project Description, of this Subsequent MND, primary access to the Project Site would be unchanged and would continue to be from Mulholland Drive. The Project also would not conflict with Objective 13-2 and associated policies regarding the intensity of development with appropriate transportation infrastructure. As discussed further below and detailed in the Transportation Study, the Project would not generate traffic such that impacts to the existing transportation system would occur. Overall, the Project would not conflict with the general intent of the Community Plan.

Los Angeles Municipal Code

LAMC Section 12.26J, the TDM Ordinance, establishes TDM requirements for projects with at least 25,000 square feet of non-residential floor area. The Project would incorporate TDM measures as part of the project design aimed at encouraging use of alternative transportation modes in line with the requirements set forth in the TDM Ordinance. Specifically, as part of the Project, Curtis School would continue to operate under the Existing CUP's transportation standards requiring 80 percent of the students and 50 percent of the staff to carpool, rideshare, bus, or vanpool.

LAMC Section 12.37 pertains to development or expansion of buildings along Highways and Collector Streets and also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Adjacent to the Project Site, Mulholland is designated a Scenic Parkway and Mulholland Place is designated a Local Street—Standard. Therefore, this LAMC section would not apply to the Project.

Vision Zero

Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. The Project Site is not located in the High Injury Network.

Other Plans and Policies

As discussed above in Checklist Section XI, Land Use and Planning, the Project also would not conflict with SCAG RTP/SCS.

Based on the above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Impacts would be less than significant, and no mitigation measures are required.

Intersection Impact Analysis

As discussed above, in July 2019, LADOT updated the City's Transportation Assessment Guidelines to conform to the requirements of Senate Bill 743. The Transportation Assessment Guidelines replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under the California Environmental Quality Act from level of service (LOS) to vehicle miles traveled (VMT). A Transportation Impact Study was previously prepared under the City's previous Transportation Impact Study Guidelines that evaluated transportation impacts based on level of service. This analysis is summarized herein for information purposes only.

The Transportation Impact Study for the Project utilized the Critical Movement Analysis (CMA) method of intersection capacity calculation to analyze signalized intersections in the City of Los Angeles. LOS is used to describe the operating condition of intersections and roadways. LOS categories range from excellent, nearly free-flow traffic at LOS A to stop-and-go conditions at LOS F. LOS D is typically recognized as a satisfactory service level in urban areas, although many urbanized areas operate at LOS E or F. The CMA methodology determines the intersection volume-to-capacity (V/C) ratio and corresponding LOS for the turning movements and intersection characteristics at signalized intersections based on the definitions described in Table 14 on page 119.

LADOT had established threshold criteria used to determine whether a significant impact would occur from a proposed project's traffic on the signalized study intersections. LADOT's previous standards indicated that a project is considered to have a significant traffic impact on a signalized intersection if the increase in the V/C ratio attributable to the project exceeds a specific standard depending on the final intersection LOS. These standards or significance thresholds are presented in Table 15 on page 120.

By applying the aforementioned analysis procedures to the study intersections, the CMA values and the corresponding LOS for future traffic conditions were calculated. These basic CMA calculations were adjusted, however, to account for traffic signal enhancements that are not considered in the CMA methodology, such as the City of Los Angeles' ATSAC and ATCS System. These computerized control systems have been found by LADOT to substantially increase system capacity and reduce motorist delay. Therefore, per LADOT policy, the CMA values calculated using the standard methodology were reduced by 0.07 at the signalized intersections where the ATSAC system has been implemented. For the signalized intersections with ATSAC upgraded to ATCS, a reduction of 0.10 was applied in order to approximate the improvement in intersection capacity resulting from the ATCS implementation. All study intersections are currently upgraded to the ATCS system, which is an upgrade from the ATSAC system.

The selection of study intersections for the Transportation Impact Study was based on their proximity to the Project Site, and their potential to be impacted by Project traffic. The five analyzed intersections include:

- Intersection 1: Walt Disney Drive (Project Driveway) & Mulholland Drive
- Intersection 2: Skirball Center Drive & Mulholland Drive
- Intersection 3: Skirball Center Drive & I-405 Freeway Northbound Ramps
- Intersection 4: Sepulveda Boulevard & Skirball Center Drive

Table 14
Level of Service as a Function of Critical Movement Analysis (CMA) and Intersection Capacity Utilization (ICU) Values

| Level of Service | Description of Operating Characteristics | Range of CMA/ICU Values |
|--|---|-------------------------|
| A | Uncongested Operations; all vehicles clear in a cycle. | 0.000–0.600 |
| B | Same as above | 0.601–0.700 |
| C | Light congestion; occasional backups on critical approaches. | 0.701–0.800 |
| D | Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed. | 0.801–0.900 |
| E | Sever congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements. | 0.901–1.000 |
| F | Forced flow with stoppages of long duration. | > 1.000 |
| <hr/> <i>Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.</i> | | |

- Intersection 5: Sepulveda Boulevard & I-405 Freeway Southbound Ramps

The Transportation Impact Study evaluated the following scenarios:

- Existing Conditions (2018)—The analysis of existing traffic conditions provides a basis for the assessment of existing and future traffic conditions with the addition of Project traffic.
- Existing Plus Project Conditions (2018)—The California Environmental Quality Act (CEQA) and LADOT require an evaluation of project traffic impacts on the existing environment as part of a traffic impact analysis. This analysis evaluates potential Project-related traffic impacts as compared to existing conditions during the analyzed peak periods.
- Future Without Project Conditions (2035)—This analysis projects the future traffic growth and intersection operating conditions during the analyzed peak periods that could be expected as a result of regional growth and related projects in the vicinity of the Project Site. The Future Without Project traffic conditions are projected by adding ambient traffic growth (compounded at one percent per year) and traffic from related projects to existing conditions. This analysis provides the baseline conditions by which Project impacts are evaluated at full buildout in 2035.
- Future Plus Project Conditions (2035)—This analysis identifies the potential incremental impacts of the Project at full buildout on projected future traffic operating conditions during the analyzed peak periods by adding the net Project-generated traffic to the Future Without Project traffic forecasts for the year 2035.

In accordance with LADOT requirements, to evaluate the potential impacts of the Project on the surrounding street system, it was necessary to develop estimates of future traffic conditions in the area both without and with the Project's traffic. Thus, estimates of traffic growth were first developed for the

Table 15
LADOT Criteria for Significant Traffic Impact

| LOS | V/C | Project-Related Increase in CMA Value |
|--|---------------|---------------------------------------|
| C | 0.700–0.800 | Equal to or greater than 0.04 |
| D | > 0.800–0.900 | Equal to or greater than 0.02 |
| E, F | > 0.900 | Equal to or greater than 0.01 |
| <hr/> <i>Source: City of Los Angeles Department of Transportation.</i> | | |

study area to forecast future conditions without the Project. As described above, these forecasts included traffic increases due to general regional ambient traffic growth and traffic from known related projects, including the potential increase from 490 students to 675 students at The Curtis School as permitted by the Existing CUP and CUP 89-0763 approved on April 12, 1990. An ambient growth factor of one percent per year was applied to the existing (2018) traffic volumes to reflect the effects of regional growth and development through 2035. As provided in the Transportation Impact Study, the forecasted trip generation from the following related projects was also incorporated into the traffic analysis:

- Bank Project at 15821 Ventura Boulevard
- Valley Beth Shalom at 15739 Ventura Boulevard
- Coffee Shop at 15315 Dickens Street
- Convenience Store at 15445 Ventura Boulevard
- Mixed-Use Project at 16206 Ventura Boulevard
- Hotel at 15485 Ventura Boulevard
- Il Villaggio Toscano Project at 4827 Sepulveda Boulevard; and
- The Curtis School Student Enrollment Increase

Additionally, the standards regarding student and teacher carpooling established under the School's Transportation Demand Management Program pursuant to CUP 89-0763, approved on April 12, 1990, would continue to be implemented and, as set forth in the following project design feature, would be expanded to the 50 additional faculty and staff members proposed as part of the Project:

Project Design Feature TRA-PDF-1: Fifty-percent participation in carpooling/ridesharing/busing/vanpooling by the 50 faculty and staff members added by the Project.

The continued implementation of the eighty percent student participation in carpooling/ridesharing/busing/vanpooling and fifty percent participation in carpooling/ridesharing/busing/vanpooling for the School's currently permitted faculty and staff populations, as required by CUP 89-0763, was also assumed. Specifically, the operational traffic impact analysis for the Project assumed the School's Transportation

Demand Management Program would continue to be implemented for all School students and faculty and staff members, and therefore the trip generation rates would not increase from the observed existing levels.

Existing intersection operations, in the form of V/C ratios and corresponding LOS, during the weekday morning peak period, the school afternoon peak period, and during the P.M. commuter peak period for each of the intersections are summarized in Table 16 on page 122. As shown therein, all intersections operate at LOS D or better during the A.M. peak period, the school afternoon peak period, and the P.M. commuter peak period, except for Intersection 4: Sepulveda Boulevard & Skirball Center Drive, and Intersection 5: Sepulveda Boulevard & I-405 Southbound Ramps, which both operate at LOS F during the A.M. peak period.

As previously described, while the Project is intended to serve the Curtis School student population with no expansion in permitted enrollment, a total of approximately 50 additional faculty and staff members over the currently permitted levels could be employed. As described in the Transportation Impact Study provided in Appendix 8 of this Subsequent MND, the Project would generate approximately 27 new trips during the A.M. peak hour, 11 new trips during the school afternoon peak period, and 27 new trips during the P.M. commuter peak period. As previously discussed, all intersections currently operate at LOS D or better during the A.M. peak hour, school afternoon peak period, and P.M. commuter peak period, with the exception of Intersection 4: Sepulveda Boulevard and Skirball Center Drive, and intersection 5: Sepulveda Boulevard and I-405 Southbound Ramps, which operate at LOS F during the A.M. peak period. As shown in Table 16, the additional trips generated by the Project would not result in a significant impact during any of the analyzed peak periods under the Existing with Project condition.

As shown in Table 16, under Future (2035) Without Project conditions, the majority of the study intersections would operate at LOS C or better during the analyzed peak periods, except for Intersections 2, 4, and 5, which would operate at LOS F during the A.M. peak period. As provided in Table 16, under Future (2035) With Project conditions, all five study intersections would continue to operate at the same LOS during all peak periods. The Project would not result in significant impacts at the study intersections during the analyzed peak periods under Future with Project conditions.

b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. As discussed in the Transportation Study, based on LADOT's Transportation Assessment Guidelines, a Transportation Assessment is required when a project is likely to add 250 or more daily vehicle trips to the local street system. As provided below, the Project would not generate 250 or more net daily vehicle trips requiring the preparation of Transportation Assessment. However, a Transportation Study was prepared for the Project to document the potential traffic impacts associated with construction and operation of the Project. These analyses are summarized below.

Construction

As evaluated in the Transportation Study, in order to assist in determining whether further analysis of construction impacts is required, LADOT's Transportation Assessment Guidelines establishes the following five screening criteria to identify development projects that may reduce the functionality of nearby roadways:

Table 16
Intersection Levels of Service Analysis

| No. | Intersection | Peak Hour | Existing (2018) Without Project | | Existing (2018) With Project | | | Future (2035) Without Project | | Future (2035) With Project | | | Significant Impact? |
|-----|--|-------------|------------------------------------|-----|---------------------------------|-----|--------|----------------------------------|-----|-------------------------------|-----|--------|------------------------|
| | | | CMA | LOS | CMA | LOS | Change | CMA | LOS | CMA | LOS | Change | |
| 1 | Walt Disney Drive & Mulholland Drive | A.M. | 0.424 | A | 0.427 | A | 0.003 | 0.591 | A | 0.595 | A | 0.004 | No |
| | | SCHOOL P.M. | 0.426 | A | 0.429 | A | 0.003 | 0.531 | A | 0.534 | A | 0.003 | No |
| | | P.M. | 0.466 | A | 0.474 | A | 0.008 | 0.579 | A | 0.588 | A | 0.009 | No |
| 2 | Skirball Center Drive & Mulholland Drive | A.M. | 0.777 | C | 0.784 | C | 0.007 | 0.979 | E | 0.986 | E | 0.007 | No |
| | | SCHOOL P.M. | 0.576 | A | 0.577 | A | 0.001 | 0.725 | C | 0.726 | C | 0.001 | No |
| | | P.M. | 0.434 | A | 0.437 | A | 0.003 | 0.548 | A | 0.551 | A | 0.003 | No |
| 3 | Skirball Center Drive & I-405 NB On/Off-Ramp | A.M. | 0.477 | A | 0.480 | A | 0.003 | 0.611 | B | 0.614 | B | 0.003 | No |
| | | SCHOOL P.M. | 0.534 | A | 0.536 | A | 0.002 | 0.667 | B | 0.669 | B | 0.002 | No |
| | | P.M. | 0.391 | A | 0.396 | A | 0.005 | 0.492 | A | 0.498 | A | 0.006 | No |
| 4 | Skirball Center Drive & Sepulveda Boulevard | A.M. | 1.085 | F | 1.085 | F | 0.000 | 1.328 | F | 1.328 | F | 0.000 | No |
| | | SCHOOL P.M. | 0.410 | A | 0.410 | A | 0.000 | 0.514 | A | 0.514 | A | 0.000 | No |
| | | P.M. | 0.420 | A | 0.421 | A | 0.001 | 0.526 | A | 0.527 | A | 0.001 | No |
| 5 | Sepulveda Boulevard & I-405 SB Ramps | A.M. | 1.224 | F | 1.224 | F | 0.000 | 1.486 | F | 1.486 | F | 0.000 | No |
| | | SCHOOL P.M. | 0.566 | A | 0.567 | A | 0.001 | 0.715 | C | 0.717 | C | 0.002 | No |
| | | P.M. | 0.828 | D | 0.831 | D | 0.003 | 1.021 | F | 1.024 | F | 0.003 | No |

Source: Crain and Associates, 2018.

1. The project requires construction activities to take place within the right-of-way of a Boulevard or Avenue (as designated in Mobility Plan 2035), which would necessitate temporary lane, alley, or street closures for more than one day (including day and evening hours, and overnight closures if a residential street).
2. The project requires construction activities to take place within the right-of-way of a Collector or Local Street, which would necessitate temporary lane, alley, or street closures for more than seven days (including day and evening hours, and overnight closures if a residential street).
3. In-street construction activities would result in the loss of regular vehicle, bicycle, or pedestrian access, including loss of existing bicycle parking, to an existing land use for more than one day, including day and evening and overnight closures if access is lost to residential uses.
4. In-street construction activities would result in the loss of regular ADA pedestrian access to an existing transit station, stop, or facility (e.g., layover zone) during revenue hours.
5. In-street construction activities would, for more than one day, result in the temporary loss of an existing bus stop or the rerouting of a bus route that serves the project site.

As discussed in the Transportation Study, all construction activities for the Project would be contained within the Project Site. No traffic lanes, alleys, or streets would require closure during construction of the Project, and there would be no off-site staging of trucks. In addition, no temporary fencing or barricades would be installed along any public roadways. Construction activities also would not interfere with transit stops and would not limit access to adjacent properties. There are no existing bicycle facilities adjacent to the Project Site that would be impacted by construction activities.

Additionally, the Project would prepare a Construction Staging and Traffic Management Plan, to be approved by the LADOT, which would detail the designated haul routes and staging areas, traffic control procedures, emergency access provisions, and construction crew parking. LADOT approval would be requested for any temporary changes in traffic control due to construction activities and, the Project would implement appropriate temporary traffic control procedures, as necessary. Haul routes for Project construction would be coordinated with the City of Los Angeles Department of Building and Safety to minimize the impact of construction traffic to congested roadways and residential streets.

Based on the above, Project construction would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Operation

The Transportation Assessment Guidelines establishes two screening criteria to evaluate the requirement of further analysis of a land use project's impact based on VMT. Both of the following criteria must be met in order to require further analysis of a land use project's VMT contribution:

1. The land use project would generate a net increase of 250 or more daily vehicle trips.
2. The project would generate a net increase in daily VMT.

Along with the updated Transportation Assessment Guidelines, LADOT developed a VMT Calculator. The VMT Calculator estimates the daily vehicle trips, daily VMT, daily household VMT per capita, and daily work VMT per employee for land use projects. The VMT Calculator was utilized to determine the net daily trip generation for the Project. Based on the VMT Calculator, the Project would generate 0 net daily vehicle trips and 0 net daily VMT since the School | Private School (K–12) land use rate used has only one independent variable available in the VMT Calculator for generating trips and VMT: number of students. As part of the Project, there would be no increase in the maximum number of permitted students. Therefore, using the tools available via the VMT Calculator, the Project would generate fewer than 250 net daily vehicle trips, and the Project would not require the preparation of a TA or further VMT analysis, per the screening thresholds in the TAG. However, as previously described, the Project would add up to 50 faculty/staff to the School's employment cap (from 68 to 118 employees). This increase in School employees is expected to generate an increase in the number of vehicle trips made to and from the Project Site. Therefore, although not required under the LADOT's Transportation Assessment Guidelines, in order to provide a conservative estimate of the Project's net daily vehicle trip generation, an alternative methodology based on the latest edition of the ITE Trip Generation Manual was utilized to forecast the Project's net daily vehicle trips. ITE Land Use Code (LUC) 110—General Light Industrial and LUC 710—General Office Building were selected as they each represent land uses for which the vast majority of trips are associated with employees. Based on the General Light Industrial use, 50 employees would generate approximately 153 daily vehicle trips. Per the General Office Building use, 50 employees would generate approximately 164 daily vehicle trips. Both of these daily totals fall well below the threshold of 250 net daily vehicle trips that requires the preparation of a Transportation Assessment. In addition, it is noted that this estimate is conservative because it assumes that the Project would immediately add 50 staff members, when the School would likely add staff gradually as the Master Plan buildout occurs over many years and may never add all 50 requested staff members.

In summary, based on the updated Transportation Assessment Guidelines, a Transportation Assessment is required when a project is likely to add 250 or more vehicle trips to the local roadway system. Given that the Project is anticipated to generate fewer net daily vehicle trips than this threshold, the Project is not expected to result in a significant transportation impact to the transportation system.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The Project's design does not include hazardous design features. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections due to design features. In addition, the development of the Project would not result in roadway improvements such that safety hazards would be introduced adjacent to the Project Site. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the LAFD. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site. Therefore, no impacts associated with hazardous design features or incompatible uses would occur, and no mitigation measures are required.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located at Mulholland Drive and Walt Disney Drive. During Project operation, primary emergency access would continue to be provided from both Mulholland

Drive and Walt Disney Drive. In addition, emergency access would continue to be provided along Mulholland Place. Additionally, site evacuation plans and procedures would be provided to the LAFD prior to issuance of building permits. As previously described, short-term Project construction activities and the staging of construction equipment would primarily occur within the existing Curtis School campus. Therefore, emergency access to the Project Site during construction would be maintained via Mulholland Drive, Walt Disney Drive, and Mulholland Place. Project construction activities would also not impede access to other nearby uses. Furthermore, the Project would implement a Construction Staging and Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project vicinity. Therefore, the Project would have a less than significant impact on emergency access, and no mitigation measures are required.

Mitigation Measures

As provided above, the Project would not result in impacts related to transportation. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that impacts with respect to transportation would be less than significant with mitigation. As discussed above, the Project would not result in significant impacts to transportation. Therefore, the Project would not result in new impacts to transportation when compared to the impacts set forth in the Original EIR and MND.

XVIII. TRIBAL CULTURAL RESOURCES

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|---|--------------------------------------|--|-------------------------------------|--------------------------|
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: | | | | |
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact (a and b). This topic of tribal cultural resources was added to Appendix G of the CEQA Guidelines in 2019. While no known tribal cultural resources have been discovered within the Project Site, in the event tribal cultural resources are found, the Project would comply with the City's standard condition of approval to address inadvertent discovery of tribal cultural resources. This condition of approval provides for temporarily halting construction activities near the encounter and notifying the City and Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the Project. If the City determines that the object or artifact appears to be a tribal cultural resource, the City would provide any affected tribe a reasonable period of time to conduct a site visit and make recommendations regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. The Project Applicant would then implement the tribe's recommendations if a qualified archaeologist reasonably concludes that the tribe's recommendations are reasonable and feasible. The recommendations would then be incorporated into a tribal cultural resource monitoring plan and once the plan is approved by the City, ground disturbance activities could resume. In accordance with the condition of approval, all activities would be conducted in accordance with regulatory requirements. Thus, in compliance with the City's regulatory requirements, impacts to tribal cultural resources would be less than significant. Additionally, based on consultation with the Fernandeano Tataviam Band of Mission Indians, the Project would incorporate Mitigation Measures TCR-MM-1 and TCR-MM-2, below.

Mitigation Measures

As provided above, the Project would comply with the City's standard condition of approval to address inadvertent discovery of tribal cultural resources, and the Project would not result in significant impacts to tribal cultural resources. Additionally, based on consultation with the Fernandeano Tataviam Band of Mission Indians, the Project would incorporate the following mitigation measures:

Mitigation Measure TCR-MM-1: The Project Applicant shall retain a professional Native American monitor procured by the Fernandeano Tataviam Band of Mission Indians to observe all ground-disturbing activities that occur within the proposed project area which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, excavation, trenching, compaction, fence/gate removal

and installation, drainage and irrigation removal and installation, hardscape installation [benches, signage, boulders, walls, seat walls, fountains, etc.], and archaeological work. If cultural resources are encountered, the Native American monitor will have the authority to request ground disturbing activities cease within 60-feet of discovery to assess and document potential finds in real time.

Mitigation Measure TCR-MM-2: The Lead Agency and/or applicant shall, in good faith, consult with the Fernandeño Tataviam Band of Mission Indians and consulting Tribes on the disposition and treatment of any Tribal Cultural Resource encountered during the Project construction.

Conclusion

While potential impacts to tribal cultural resources were not previously evaluated in the Original EIR and MND, as provided above, the Project would comply with the City's standard condition of approval to address inadvertent discovery of tribal cultural resources, and the Project would not result in significant impacts to tribal cultural resources. Additionally, based on consultation with the Fernandeño Tataviam Band of Mission Indians, the Project would incorporate Mitigation Measures TCR-MM-1 and TCR-MM-2.

XIX. UTILITIES AND SERVICE SYSTEMS

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

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Water service to the Project Site would continue to be supplied by LADWP for domestic and fire protection uses. Any necessary water connections and upgrades to connect the proposed buildings to the existing water mains would be provided as part of the Project in consultation with LADWP during the plan check process for the Project. Project-related water infrastructure would be designed and installed to meet all applicable City requirements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Water Reclamation Plant. The Hyperion Water Reclamation Plant has a capacity of 450 million gallons per day and current wastewater flow levels are at 275 million gallons per day. Accordingly, the capacity at the Hyperion Water Reclamation Plant is 175 million gallons per day. Wastewater generated by the Project was estimated using wastewater generation factors provided by the City of Los Angeles Sanitation department (LASAN) for each of the proposed uses. As shown in Table 17 on page 129, the existing campus is estimated to generate an average daily wastewater flow of approximately 14,689 gallons per day. As shown in Table 18 on page 130, with implementation of the Project and assuming the maximum permitted enrollment of 675 students, the campus is estimated to generate an average daily wastewater flow of approximately 23,554 gallons per day. When accounting for the existing total Project Site wastewater generation, the Project would result in a net increase in average daily wastewater flows of approximately 8,865 gallons per day. It is noted that, as set forth in LASAN's wastewater generation factors, the wastewater generation from the student population captures wastewater generation from use of classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouse and storage areas, and auditoriums. Therefore, the estimated average daily wastewater generation for the Project presented in Table 18 is conservative as the wastewater generation associated with the individual uses is also calculated separately.

The Hyperion Water Reclamation Plant has a current available capacity of 175 million gallons per day. Thus, the Project's net increase in average daily wastewater flows of approximately 0.0089 million gallons per day would represent approximately 0.0051 percent of the available capacity of the Hyperion Water Reclamation Plant. In addition, sewer service for the Project would be provided utilizing new or existing on-site sewer connections to the existing sewer mains in the vicinity of the Project Site. Project-related sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards.

With regard to stormwater drainage facilities, the Project would retain the existing drainage system and would only expand the existing drainage system as necessary to support the proposed improvements. In addition, the Project has been designed to minimize the extent of non-permeable surfaces by consolidating the three parking areas currently on-site into one parking area while also locating the new parking area closer to the main entrance at Walt Disney Drive in order to reduce the need for additional roadway (non-permeable area). The Project also proposes new two-story buildings and new landscaping and landscaped gardens, and walkways that would be located throughout the Project Site to reduce the overall building footprint. As a result, upon Project implementation, the majority of the campus would remain permeable with approximately 65 percent as permeable surfaces and only approximately

Table 17
Existing Project Site Wastewater Generation

| Use | Unit | Wastewater Generation Factor ^a (gpd/unit) | Average Daily Wastewater Flow (gpd) |
|--|-----------|--|-------------------------------------|
| Students | 675 stu | 9/stu ^b | 6,075 |
| Academics | 30,000 sf | 120/1,000 sf ^c | 3,600 |
| Arts | 21,253 sf | 120/1,000 sf ^c | 2,550 |
| Athletics | 2,500 sf | 200/1,000 sf ^d | 500 |
| Commons | 16,370 sf | 120/1,000 sf ^c | 1,964 |
| Project Site Total Wastewater Generation at Project Buildout | | | 14,689^e |
| <p><i>gpd = gallons per day</i> <i>sf = square feet</i> <i>stu = students</i></p> <p>^a Wastewater generation factors based on LASAN sewage generation factors.</p> <p>^b Per City of Los Angeles sewer generation factors for a School Elementary/Jr. High, this number includes: classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses, and storage areas, auditoriums and gymnasiums.</p> <p>^c The sewer generation factor for Office Building was used for the school facilities.</p> <p>^d The sewer generation factor for Gymnasium was used for the athletic facilities.</p> <p>^e Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the City's LASAN wastewater generation rates to the proposed uses. As such, this also represents the existing campus water demand.</p> <p>Source: Eyestone Environmental, 2021.</p> | | | |

35 percent as non-permeable surface. Thus, the Project would not necessitate the construction of new stormwater drainage facilities or the expansion of existing facilities.

After the construction of the Project is complete, there would be a net increase in electricity usage on the Project Site compared to existing conditions. As shown in Table 7 on page 65, with buildout of the Project, the on-site electricity demand would be approximately 584 MWh of electricity per year.⁷⁹ This electrical demand would represent a small fraction of the existing demand for electricity by the Curtis School and would represent approximately 0.0026 percent of LADWP's projected sales in 2020.

In addition, the Project Site would result in a net increase in daily peak load of 87 kW. In comparison to the LADWP power grid base peak load of 5,845 MW in 2017, the Project Site net energy demand would represent approximately 0.001 percent of the LADWP base peak load conditions. This demand would not significantly affect the ability of LADWP to accommodate peak electrical demands.

⁷⁹ Electricity demand estimate includes electricity for the restroom, LED lighting and EV charging. Calculations are provided in Appendix 4 of this Subsequent MND.

Table 18
Project Site Wastewater Generation at Project Buildout

| Use | Unit | Wastewater Generation Factor^a (gpd/unit) | Average Daily Wastewater Flow (gpd) |
|---|-------------|--|--|
| Students ^b | 675 stu | 9/stu ^c | 6,075 |
| Academics | 35,390 sf | 120/1,000 sf ^d | 4,247 |
| Arts | 35,413 sf | 120/1,000 sf ^d | 4,250 |
| Athletics | 23,400 sf | 200/1,000 sf ^e | 4,680 |
| Commons | 35,850 sf | 120/1,000 sf ^d | 4,302 |
| Project Site Total Wastewater Generation at Project Buildout | | | 23,554 |
| Existing Project Site Total Wastewater Generation | | | (14,689) |
| Net Increase in Wastewater Generation | | | 8,865 |
| <p><i>gpd = gallons per day</i> <i>sf = square feet</i> <i>stu = students</i></p> <p>^a Wastewater generation factors based on LASAN's sewage generation factors.</p> <p>^b The maximum permitted enrollment is 675 students.</p> <p>^c Per City of Los Angeles sewer generation factors for a School Elementary/Jr. High, this number includes: classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses, and storage areas, auditoriums and gymnasiums.</p> <p>^d The sewer generation factor for Office Building was used for the proposed school facilities.</p> <p>^e The sewer generation factor for Gymnasium was used for the proposed athletic facilities.</p> <p>Source: Eyestone Environmental, 2021.</p> | | | |

As provided in Table 7 on page 65, the buildout of the Project is projected to generate a net increase in the onsite demand for natural gas totaling approximately 593,592 cf per year, assuming compliance with Title 24 standards and applicable CALGreen Code requirements. Based on the 2018 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SoCalGas' planning area will be approximately 2.54 billion cf/day in 2020 (the Project's buildout year).⁸⁰ The Project would account for approximately 0.00006 percent of the 2020 forecasted consumption in SoCalGas' planning area. In addition, the Project would incorporate a variety of energy conservation measures to reduce energy usage. Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary.

With regard to telecommunications infrastructure, the Project would require construction of new on-site telecommunications infrastructure to serve the new buildings and potential upgrades and/or relocation of existing telecommunications infrastructure. Construction impacts associated with the installation of

⁸⁰ California Gas and Electric Utilities, 2018 California Gas Report, p. 100.

telecommunications infrastructure would primarily involve trenching in order to place the lines below surface. Such activities could involve temporary closure of portions of sidewalks or travel lanes. However, the Project would implement a construction management plan during construction, which would ensure safe pedestrian access, as well as emergency vehicle access and safe vehicle travel in general, to reduce any temporary pedestrian and traffic impacts occurring as a result of construction activities. In addition, when considering impacts resulting from the installation of any required telecommunications infrastructure, all impacts are of a relatively short duration (i.e., months) and would cease to occur when installation is complete. Installation of new telecommunications infrastructure would be limited to on-site telecommunications distribution with minor off-site work associated with connections to the public system. No upgrades to off-site telecommunications systems are anticipated. Any work that may affect services to the existing energy and telecommunications lines would be coordinated with service providers and the City, as applicable.

Based on the above, the Project is not anticipated to exceed the available capacity within the utility distribution infrastructure that would serve the Project Site. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Water is provided to the Project Site by the Los Angeles Department of Water and Power. Water is supplied to the City from the Los Angeles Aqueduct, local groundwater, through purchase from the Metropolitan Water District (MWD), and recycled water. LADWP's 2015 Urban Water Management Plan anticipates adequate water supplies would be available to serve its service area under normal, single-dry, and multi-dry year conditions through 2040.⁸¹ Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the City's LASAN wastewater generation rates to the proposed uses. Accordingly, as shown in Table 17 on page 129, the existing campus is estimated to have an average daily water demand of approximately 14,689 gallons per day. As provided in Table 19 on page 132, with implementation of the Project, the campus would have an estimated average daily water demand of approximately 23,554 gallons per day. When accounting for the existing total Project Site water demand, the Project would result in a net increase in average daily water demand of approximately 8,865 gallons per day. It should be noted that per the City of Los Angeles Bureau of Sanitation sewer generation factors, the water demand from the student population presented in Table 19 captures the water demand from use of classrooms, lecture halls, professors' offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouse and storage areas, and auditoriums. Therefore, the estimated average daily water demand for the Project, as shown in Table 19, is conservative as the water demand associated with the individual uses are also calculated separately. Based on LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Therefore, the Project would not be anticipated to require new or expanded water

⁸¹ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

Table 19
Project Site Water Demand at Project Buildout

| Use | Unit | Wastewater Generation Factor ^a (gpd/unit) | Average Daily Water Demand (gpd) |
|---|-----------|---|-------------------------------------|
| Students ^b | 675 stu | 9/stu ^c | 6,075 |
| Academics | 35,390 sf | 120/1,000 sf ^d | 4,247 |
| Arts | 35,413 sf | 120/1,000 sf ^d | 4,250 |
| Athletics | 23,400 sf | 200/1,000 sf ^e | 4,680 |
| Commons | 35,850 sf | 120/1,000 sf ^d | 4,302 |
| Project Site Total Water Demand at Project Buildout | | | 23,554 |
| Existing Project Site Total Water Demand | | | (14,689) |
| Net Increase in Water Demand | | | 8,865 |
| <p><i>gpd = gallons per day</i> <i>sf = square feet</i> <i>stu = students</i></p> <p>^a Wastewater generation factors based on City of Los Angeles, Bureau of Sanitation sewage generation factors.</p> <p>^b The maximum permitted enrollment is 675 students.</p> <p>^c Per City of Los Angeles sewer generation factors for a School Elementary/Jr. High, this number includes: classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses, and storage areas, auditoriums and gymnasiums.</p> <p>^d The sewer generation factor for Office Building was used for the proposed school facilities.</p> <p>^e The sewer generation factor for Gymnasium was used for the proposed athletic facilities.</p> <p>Source: Eyestone Environmental, 2021.</p> | | | |

entitlements. As such, impacts associated with the availability of local or regional water supplies would be less than significant.

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

Less Than Significant Impact. As discussed above in Checklist Question XIX.a, the Hyperion Water Reclamation Plant has a current available capacity of 175 million gallons per day. The Project's net increase in average daily wastewater flows of approximately 0.0089 million gallons per day would represent approximately 0.0051 percent of the available capacity of the Hyperion Water Reclamation Plant. Therefore, based on the amount of wastewater expected to be generated by the Project, and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, impacts on the wastewater treatment provider would be less than significant impact.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. While the Bureau of Sanitation generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential and commercial developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the County are categorized as either Class III or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.⁸² Nine Class III landfills and one inert waste landfill with solid waste facility permits are currently serving the County.⁸³ In addition, there is one solid waste transformation facilities within Los Angeles County that converts, combusts, or otherwise processes solid waste for the purpose of energy recovery.

Based on the 2018 Countywide Integrated Waste Management Plan (CoIWMP) Annual Report, the most recent report available, the total remaining permitted Class III landfill capacity in the County is estimated at 163.39 million tons. The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 57.72 million tons of remaining capacity and an average daily in-County disposal rate of 1,148 tons per day.⁸⁴ Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the CoIWMP Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity.⁸⁵

Based on the 2018 CoIWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2033 will not exceed the 2018 remaining permitted Class III landfill capacity of 163.39 million tons. The 2018 CoIWMP Annual Report evaluated six scenarios to increase capacity and determined that the County would be able to meet the disposal needs of all jurisdictions through the 15-year planning period with existing capacity under six scenarios using in-county and out-of-county landfills. Only the scenario using in-county disposal capacity only would result in a shortfall. The 2018 CoIWMP Annual Report also concluded that in order to maintain adequate disposal capacity, individual jurisdictions must continue to pursue strategies to maximize waste reduction and recycling; expand existing landfills; study, promote, and develop alternative technologies; expand transfer and processing infrastructure; and use out of county disposal, including waste by rail. The City's Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan sets a goal of

⁸² Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

⁸³ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019. The 9 Class III landfills serving the County include the Antelope Valley Landfill, the Burbank Landfill, the Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, Savage Canyon Landfill, the Scholl Canyon Landfill, and the Sunshine Canyon City and County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

⁸⁴ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

⁸⁵ County of Los Angeles, Department of Public Works. Los Angeles County Integrated Waste Management Plan 2018 Annual Report, December 2019.

becoming a “zero waste” city by 2030. To this end, the City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling.⁸⁶ The City of Los Angeles is currently diverting 76 percent of its waste from landfills.⁸⁷ The City has adopted the goal of achieving 90 percent diversion by 2025, and zero waste by 2030.

The following analysis quantifies the Project’s construction and operation solid waste generation.

Construction

As summarized in Table 20 on page 135, to provide for the proposed improvements, the Project would remove approximately 23,010 square feet of existing uses and construct 82,940 square feet of new facilities. Pursuant to the requirements of Senate Bill 1374,⁸⁸ the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and within the Class III landfills open to the City. As shown in Table 20, after accounting for mandatory recycling, the Project would result in approximately 486 tons of construction and demolition waste. Given the remaining permitted capacity the Azusa Land Reclamation facility, which is approximately 55.72 million tons, as well as the remaining 163.4 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project’s construction solid waste disposal needs.

Operation

Based on a generation rate of 0.007 pounds per square foot per day and a generation rate of one pound per student per day provided by CalRecycle for institutional uses, the Curtis School generates approximately 1,166 pounds (0.58 ton) of solid waste per day.⁸⁹ As described in Section 3, Project Description, the Project includes the development of approximately 82,940 square feet of additional School facilities and the removal of approximately 23,010 square feet of existing facilities. With implementation of the Project, the campus would comprise a total of approximately 130,053 square feet. In addition, a maximum of 675 students are permitted. Based on a generation rate of 0.007 pound per square foot per day and a generation rate of one pound per student per day, upon-Project build-out, the School would generate approximately 1,585 pounds (0.79 ton) of solid waste per day. When accounting for the existing solid waste generation of approximately 1,166 pounds, the Project would generate a net

⁸⁶ City of Los Angeles, Solid Waste Integrated Resource Plan FAQ; www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPFAQS.pdf, accessed December 6, 2019.

⁸⁷ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed December 6, 2019.

⁸⁸ Senate Bill 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

⁸⁹ CalRecycle. Public Sector and Institutions: Estimated Solid Waste Generation Rates, available at: www.calrecycle.ca.gov/wastechar/wastegenrates/Institution.htm, accessed January 3, 2018. As provided in Section 3, Project Description, the campus currently includes approximately 70,123 square feet of School building and facilities. In addition, the School’s permitted enrollment is 675 students.

Table 20
Project Demolition and Construction Waste Generation

| Building | Size | Generation Rate (lbs/sf)^{a,b} | Total (tons)^b |
|--|-------------|---|-------------------------------------|
| Construction Waste | | | |
| Academics | 12,390 sf | 3.89 | 24 |
| Arts | 24,300 sf | 3.89 | 47 |
| Athletics | 23,400 sf | 3.89 | 46 |
| Commons | 22,850 sf | 3.89 | 44 |
| <i>Total Construction Waste</i> | | | <i>161</i> |
| Demolition Waste | | | |
| Academics | 7,000 sf | 155 | 543 |
| Arts | 10,140 sf | 155 | 786 |
| Athletics | 2,500 sf | 155 | 194 |
| Commons | 3,370 sf | 155 | 261 |
| <i>Total Demolition Waste</i> | | | <i>1,784</i> |
| Total for Construction and Demolition Waste | | | 1,945 |
| Total After 75-Percent Recycling | | | 486 |
| <p><i>lb = pound</i> <i>sf = square feet</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types.</i> ^b Numbers have been rounded to the nearest whole number. Source: Eyestone Environmental, 2021.</p> | | | |

increase of approximately 419 pounds of solid waste per day (0.21 ton) of solid waste. This would represent an increase of approximately 76 tons per year.

The estimated solid waste is conservative because the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices. Likewise, the analysis does not include implementation of the City's upcoming Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.⁹⁰ The estimated annual net increase in solid waste that would be generated by the Project represents approximately 0.000047 percent of the remaining capacity for the County's

⁹⁰ The Zero Waste LA Franchise System would divide the City into 11 zones and designate a single trash hauler for each zone. Source: LA Sanitation, "Zero Waste LA—Franchise," www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlafr;jsessionid=nJABd_CcLHL4DCOKGSCJWv1buV9atyQtoUkP50TwYHe5jczy6OaK!782088041!NONE?_afLoop=17071741526736871&_afWindowMode=0&_afWindowId=null#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D17071741526736871%26_afWindowMode%3D0%26_adf.ctrl-state%3Dge1mehnju_4, accessed January 2, 2018.

Class III landfills open to the City of Los Angeles.⁹¹ The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the County's Class III landfills.

Based on the above, the landfills that serve the Project Site would have sufficient permitted capacity to accommodate the solid waste that would be generated by the construction and operation of the Project. Therefore, impacts would be less than significant, and no mitigation measures are required.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Further, Assembly Bill 341 (AB 341), which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. Additionally, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure, and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste⁹² on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area or room of specified size on the Project Site.⁹³ The Project would also promote compliance with AB 939, AB 341, AB 1826 and City waste diversion goals by providing clearly marked, source sorted receptacles

⁹¹ 76 tons per year/163.39 million tons x 100 = 0.000047%

⁹² Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

⁹³ Ordinance No. 171687 adopted by the Los Angeles City Council on August 6, 1997.

to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, no impacts would occur and no mitigation measures would be required.

Mitigation Measures

As provided above, the Project would not result in significant impacts to utilities and service systems. Therefore, no mitigation measures are required.

Conclusion

The Original EIR determined that impacts to utilities and service systems would be less than significant with implementation of mitigation. As discussed above, the Project would not result in significant impacts to utilities and service systems. Therefore, the Project would not result in new impacts to utilities and service systems when compared to the impacts set forth in the Original EIR and MND.

XX. WILDFIRE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|-------------------------------------|
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: | | | | |
| a. Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located within a Very High Fire Hazard Severity Zone, as established by the City of Los Angeles. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes

Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. Exhibit H identifies the I-405 Freeway as the designated evacuation route closest to the Project Site.⁹⁴ Primary access to the Project Site is and would continue to be provided from Walt Disney Drive via Mulholland Drive.

Short-term Project construction activities and the staging of construction equipment would occur mainly within the existing Curtis School campus. Emergency access to the Project Site during construction would be maintained via Mulholland Drive and Walt Disney Drive and Mulholland Place. Project construction activities would also not impede access to other nearby uses. Furthermore, the Project would implement a Construction Staging and Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project Site vicinity. The Project would also be required to comply with all City and state building, fire and safety codes. In addition, the Project would be designed to conform to the standards of the City of Los Angeles Fire Department (LAFD) for emergency access, including fire lane (truck access) standards. The Project also would not install barriers that would impede access to the Project Site and vicinity and the Project would not result in the temporary or permanent closure of Mulholland Drive or any other streets in the vicinity of the Project Site. Therefore, construction and operation of the Project would not have the potential to interfere with access to and along a City-designated disaster route. Accordingly, the Project would not impair an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located in the Santa Monica Mountains and is surrounded by two ridges that slope down from Mulholland Drive. Due to the Project Site's location within a Very High Fire Hazard Severity Zone, the School would continue to comply with the requirements set forth for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. In addition, the Project would involve the construction of new and upgraded buildings, which would implement the latest in fire prevention. Therefore, the Project would not exacerbate wildfire risks. Impacts associated with wildfires would be less than significant, and no mitigation measures are required.

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

No Impact. The Project would be served by existing roads and infrastructure. Therefore, the Project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that would result in impacts to the environment. No impact would occur, and no mitigation measures are required.

⁹⁴ Safety Element of the Los Angeles City General Plan, Exhibit H, City of Los Angeles, November 26, 1996.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The Project Site is located within a City-designated Very High Fire Hazard Severity Zone⁹⁵ and is located within a City-designated fire buffer zone.⁹⁶ However, the Project would not include the construction of any new habitable buildings or uses that would introduce a new permanent population on the Project Site which could be exposed to potential fire risks from the Project Site's proximity to the Santa Monica Mountains including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. In addition, the Project would be limited to the boundaries of the Project Site and would not include construction activities in the surrounding hillsides such that stability of the surrounding hillsides would be compromised. Further, upon buildout of the Project, the existing topography of the Project Site would not be substantially altered. In addition, the Project would install drought tolerant landscaping and irrigation on the Project Site, which will help reduce the risk of fire. Moreover, the Project would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. Therefore, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

⁹⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report for APN 4429037022, <http://zimas.lacity.org/>, accessed November 13, 2018. The Very High Fire Hazard Severity Zone was first established in the City of Los Angeles in 1999 and replaced the older "Mountain Fire District" and "Buffer Zone" shown on Exhibit D of the Los Angeles General Plan Safety Element.

⁹⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

| | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
|--|--------------------------------------|--|-------------------------------------|--------------------------|
| b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

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

Less Than Significant Impact. As analyzed above, the Project would not result in any significant, unmitigable environmental impacts that have the potential to degrade the quality of environment. With implementation of the prescribed mitigation measures, all Project impacts would be reduced to less than significant levels.

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

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as “two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts.”⁹⁷ This analysis of cumulative impacts need not be as in-depth as what is performed relative to the Project, but instead is to “be guided by the standards of practicality and reasonableness.”⁹⁸

Eleven (11) related projects were identified within a 2-mile radius of the Project Site. These related projects include the following:

1. A bank located at 15821 Ventura Boulevard

⁹⁷ State CEQA Guidelines, 14 California Code of Regulations, § 15355, *et seq.*

⁹⁸ *Ibid*, § 15355.

2. Valley Beth Shalom at 15739 Ventura Boulevard
3. A coffee shop located at 15315 Dickens Street
4. A convenience store at 15445 Ventura Boulevard
5. A mixed-use project at 16206 Ventura Boulevard
6. A 180-room hotel at 15485 Ventura Boulevard
7. Il Villaggio Toscano Project at 4827 Sepulveda Boulevard
8. An enrollment increase for the Curtis School from the current enrollment of 492 students to the permitted maximum enrollment cap of 675 students
9. Mission Canyon Trailhead Project at 2301 N. Sepulveda Boulevard
10. Apartment Project at 16161 Ventura Boulevard
11. Mirman School at 16180 W. Mulholland Drive

With the exception of the Curtis School related project, the nearest related project is the Mirman School at 16180 W. Mulholland Drive, which is approximately 0.4 mile west of the Project Site. As the following analysis indicates, due to the distance of most of the related projects from the Project Site and specific on-site conditions, the Project would not result in significant cumulative impacts for any of the environmental issue areas.

Aesthetics—Due to the presence of two ridgelines within the Project Site, visibility of the Project Site from off-site public areas is limited. Additionally, the Project would include perimeter landscaping to further obscure those portions of the Project that would potentially be visible from Mulholland Drive (i.e., a portion of the new Gymnasium Building). The majority of the related projects are located north of the Project Site, primarily along Ventura Boulevard. Based on the distance of the related projects from the Project Site and intervening topography, the Project and related projects would not alter the aesthetic environment. Moreover, related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding, building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Thus, the cumulative impacts associated with aesthetics would be less than significant.

Agriculture and Forestry Resources—The Project Site is developed with educational uses and no agricultural or forest lands or uses exist within the Project Site or vicinity. In addition, implementation of the Project would not convert farmland to non-agricultural use. Furthermore, the related projects do not proposed agricultural or forest uses or a change in land use within an area currently developed for agricultural or forest uses. Thus, no cumulative impacts related to agriculture and forestry resources would occur.

Air Quality—According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). For the purpose of identifying

construction-related air quality impacts, the analysis utilized a very conservative approach by evaluating impacts from Phase II with the maximum daily earth movement, soil disturbance, and use of heavy-duty construction equipment that could occur on a maximum construction day. Construction-related impacts would typically be less than those described above in Checklist Section III, Air Quality. Impacts from construction activities would be less than significant. Therefore, the Project's construction emissions would not be cumulatively considerable. Similarly, the operational emissions associated with the Project would not exceed the recommended thresholds and would not be cumulatively considerable.

Biological Resources—Due to their site-specific nature, impacts on biological resources are typically assessed on a project-by-project basis. As discussed above, no special-status wildlife species are considered to have a moderate or high potential for occurrence in the Project area. Therefore, Project implementation would not result in significant impacts to special-status plant and wildlife species. In addition, as with the Project, related projects would be required to comply with both the City of Los Angeles' Protected Tree Ordinance as well as the provisions of the Street Tree Ordinance. Furthermore, as with the Project, related projects would also comply with the Migratory Bird Treaty Act during removal of mature trees for protection of migratory birds and bird nests. Thus, as the Project would not result in significant impacts to biological resources, the Project would not cumulatively contribute to impacts related to biological resources in the vicinity of the Project area.

Cultural Resources—Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project does not include historical resources and the Project would not involve the removal of historical resources. Therefore, Project impacts to historical resources would not be cumulatively considerable. With regard to potential cumulative impacts related to archaeological resources, the Project vicinity is located within an urbanized area that has been disturbed and developed over time. In the event that archaeological resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including CEQA Guidelines Section 15064.5, Public Resources Code Section 21083.2, Health and Safety Code Section 7050.5, and Public Resources Code Section 5097.9. Therefore, Project impacts to cultural resources would be less than significant.

Energy—As with the Project, the related projects would be expected to implement energy conservation features to minimize the inefficient use of energy, in accordance with applicable regulations, including the City's Green Building Ordinance and Title 24 energy efficiency standards. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Geology and Soils—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be

established as necessary to address the potential for uncovering of paleontological resources. Thus, cumulative impacts related to geology and soils would be less than significant.

Greenhouse Gas Emissions—The analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. As analyzed above, the Project's impacts regarding greenhouse gas emissions would be less than significant. As such, cumulative impacts related to greenhouse gas emissions would be less than significant.

Hazards and Hazardous Materials—As with the Project, all related development located within the vicinity of the Project Site would be subject to local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the concurrent development of the Project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

Hydrology and Water Quality—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Project, related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would be evaluated on an individual basis by City of Los Angeles to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Thus, cumulative impacts related to hydrology/water quality would be less than significant.

Land Use and Planning—The Project would not result in any significant impacts associated with land use and planning. As with the Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

Mineral Resources—As the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey, the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project vicinity. Therefore, the Project's contribution to the loss of mineral resources would not be cumulatively considerable.

Noise—Noise impacts during construction of the Project would be less than significant. In addition, there are no related projects adjacent to the Project Site that together with the Project would generate cumulative noise impacts. Therefore, the Project's contribution to noise levels would not be considered cumulatively considerable.

Population and Housing—The Project would not construct any residential units and the potential increase in employment is not expected to cause a notable number of residents to move to the Encino–Tarzana Community Plan area. Further, the Project Site is located in an urbanized area with infrastructure that is already in place. Thus, the Project would not induce substantial population growth or

displace substantial numbers of people. In addition, while related projects could cumulatively increase population in the area, such increases are expected to be within City and SCAG growth forecasts. Thus, cumulative impacts associated with population and housing would be less than significant.

Public Services—With regard to fire protection, all project plans are reviewed by the LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. In addition, all projects are required to comply with LAFD requirements and building code requirements. Therefore, the Project would not result in impacts to LAFD fire protection services that would be cumulatively considerable.

Regarding police protection services, the Project would not introduce a direct residential population typically associated with an increased demand for such services. In addition, any indirect increase in the local residential population would be inconsequential. Moreover, the Project would include the implementation of security features such as security lighting, which would be consistent with that currently occurring on-site. Thus, the Project would not result in impacts to LAPD police protection services that would be cumulatively considerable.

As analyzed previously, the Project would not generate a direct residential population that could increase the demand for schools and libraries. In addition, any indirect increase in the local residential population would be inconsequential. Therefore, the Project would not contribute to a cumulatively considerable impact with regard to schools and libraries.

Parks and Recreation—The Project does not include residential development, which typically creates a direct demand on park services. In addition, any indirect increase in the local residential population would be inconsequential. Furthermore, the Project would increase the open spaces and recreational facilities available on-site. Thus, the Project would result in a benefit associated with parks and recreational facilities and no new demand for parks and recreational facilities would be expected to occur. In addition, while the existing athletic field would be relocated, the physical impacts associated with this improvement have been evaluated in this Subsequent MND. Moreover, related projects would be subject to discretionary review by the City, and would be required to comply with the parks and recreation requirements of the Quimby Act and the LAMC. Thus, cumulative impacts with respect to parks and recreation would be less than significant.

Transportation—As analyzed above, the Project would not result in significant transportation impacts and would therefore not contribute substantially to cumulative traffic increases. Thus, the project's contribution to traffic impacts would not be cumulatively considerable. While some related projects may result in a significant impact related to transportation, such related projects would implement appropriate mitigation to address such impacts. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to transportation. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Tribal Cultural Resources—As previously discussed, the majority of the related projects are located a substantial distance from the Project Site. In addition, the Project and the related projects are located within an urbanized area that has been disturbed and developed over time. In the event that tribal cultural resources are uncovered, each related project would be required to comply with applicable regulatory requirements, including the City's condition of approval for the inadvertent discovery of tribal cultural resources. Related projects would also be required to comply with the consultation requirements of

Assembly Bill 52 to determine and mitigate any potential impacts to tribal cultural resources. As with the Project, based on consultant with tribes on related projects, specific mitigation measures may be identified by a tribe and would be implemented by the related project. Therefore, cumulative impacts to tribal cultural resources would be less than significant.

Utilities and Service Systems—Due to shared urban infrastructure, the Project and related projects would cumulatively increase wastewater generation, stormwater discharge, and water consumption. However, utility system capacity must be demonstrated during the approval process for each related project. In addition, water conservation regulations would continue to be implemented by the City to ensure that adequate water supplies will be available. Cumulative demand for water supply and wastewater treatment would be further reduced by water conservation measures such as the mandatory indoor water reduction rates required by the City of Los Angeles Green Building Code.

Based on LA Sanitation's average flow projections for the Hyperion Service Area, it is anticipated that the average flow in 2035 will be approximately 493 mgd.⁹⁹ In addition, the Hyperion Service Area's total treatment capacity would be approximately 550 mgd in 2030, conservatively assuming that the capacity will be the same as its existing capacity.¹⁰⁰ While the Project buildout year is 2035, it is anticipated that the City would continue to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City. For example, the City is currently working on the One Water LA 2040 Plan, which identifies programs and policies that will ensure sustainable, resilient, and long-term water supplies for Los Angeles.¹⁰¹ In addition, as with the Project, new development projects occurring in the Project vicinity, including the related projects, would be required to coordinate with the City of Los Angeles Bureau of Sanitation via a sewer capacity availability request to determine adequate sewer capacity. In addition, new development projects would be subject to Los Angeles Municipal Code Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Therefore, cumulative impacts on the wastewater treatment systems would be less than significant.

Additionally, as concluded in LADWP's 2015 Urban Water Management Plan, projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2040. Further, with respect to additional growth within the LADWP service area, through LADWP's Urban Water Management Plan process, the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. Therefore, LADWP would be able to supply the demands of the Project and future growth through 2040 and beyond. As such, Project impacts on water supply would not be cumulatively considerable and cumulative impacts on water supply would be less than significant.

⁹⁹ Conservatively based on the 2035 data set forth in the 2015 Urban Water Management Plan. City of Los Angeles, Department of Public Works, Bureau of Sanitation, 2015 Urban Water Management Plan, April 2016, Exhibit 4D.

¹⁰⁰ LASAN, Wastewater System Fact Sheet, www.lacitysan.org/san/sandocview?docname=QA001435, accessed June 12, 2018.

¹⁰¹ One Water LA, About Us, www.lacitysan.org/san/faces/home/portal/s-lsh-es/s-lsh-es-owla?_afLoop=5765032943141077&_afWindowMode=0&_afWindowId=null&_adf.ctrl-state=7o4zybcth_1#!%40%40%3F_afWindowId%3Dnull%26_afLoop%3D5765032943141077%26_afWindowMode%3D0%26_adf.ctrl-state%3D7o4zybcth_5, accessed June 12, 2018.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, since unclassified landfills in the County do not generally have capacity concerns, inert landfills serving the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational waste disposal needs, the waste generated by the Project would be well within the capacity of existing landfills. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, cumulative impacts with regards to solid waste are concluded to be less than significant.

Based on the above, as the service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, cumulative impacts on utilities and service systems are concluded to be less than significant.

Wildfire—As discussed above, the Project would not include the construction of any new buildings or uses that would introduce a new permanent population on the Project Site which could be exposed to potential fire risks from the Project Site's proximity to the Santa Monica Mountains. Therefore, the Project would not contribute to an increased wildfire risk. Moreover, the Project and related projects would be developed in accordance with LAMC requirements pertaining to fire safety. Specifically, Section 57.106.5.2 of the LAMC provides that the Fire Chief shall have the authority to require drawings, plans, and sketches as necessary to identify access points, fire suppression devices and systems, utility controls, and stairwells; Section 57.118 of the LAMC establishes LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects; and Section 57.507.3.1 establishes fire water flow standards. With compliance with existing City regulations regarding wildfires, the potential for any of the related projects to result in a significant impact associated with wildfires would be addressed. Therefore, the Project and related projects would not result in significant cumulative impacts with respect to wildfire. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

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

Less Than Significant Impact. Based on the analysis presented above, implementation of the aforementioned mitigation measures would reduce environmental impacts such that no substantial adverse effects on humans would occur.