City of Los Angeles

Department of City Planning•Environmental Analysis Section

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

# INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

## PALMS-MAR VISTA-DEL REY COMMUNITY PLAN AREA

## Windward School Master Plan Project

Case Number: **2018-4476-MND**

**Project Location:** The Project Site is located at 11340-11350 Palms Boulevard, 3481-3485 Sawtelle Boulevard, and 11375 Westminster Avenue, in the City of Los Angeles, California. The Project Site is bounded by Palms Boulevard to the north and Sawtelle Boulevard to the east; portions of the Project Site extend to Westminster Avenue to the south. To the west, the Project Site is bordered by residential uses located along Butler Avenue, and the Los Angeles County Flood Control District's Sepulveda Channel.

**Council District:** 11; Mike Bonin

**Project Description:** The Windward School is seeking to update its previously approved Windward School Master Plan (Master Plan)[1] to implement a series of phased campus improvements and to request an increase in student enrollment of 35 students for a total capacity of 585 students, with an increase in ultimate maximum enrollment of up to 625 in 2022. The proposed improvements include the demolition of various existing facilities, upgrades and expansion of existing classrooms and educational facilities, and construction a new performing arts facility. Implementation of the Project would provide Windward School the ability to meet the immediate and long-term educational needs of the campus community. The Project is proposed in three phases and would be implemented over a period of 6 years, with an estimated completion date of 2025 (Project).

The proposed improvements in Phase 1 include the repurposing of the existing apartment building for temporary office and administrative uses during the construction of the new classroom and administration buildings north of the Sepulveda Channel, and the addition of temporary modular classrooms in the apartment building parking lot area. The existing pedestrian bridge that currently spans the Sepulveda Channel would be removed and replaced with a new pedestrian bridge. Phase 1 includes the partial demolition, renovation and expansion of one existing classroom, office, and theater building, including renovation of the existing black box theatre. Phase 1 would also involve the removal of the

1 City of Los Angeles, Department of City Planning, Case No. ZA-98-0893-ZV-YV (May 1999).

temporary modular classroom area once the renovation and construction of the new buildings are complete.

Phase 2 of the Project involves the removal of the existing apartment building and the construction of an approximatively 58,351-square-foot performing arts facility (also known as the Arts and Innovation Center). Phase 2 also involves the construction of a pedestrian bridge connecting the new Arts and Innovation Center to the existing gym on the Project Site.

Phase 3 of the Project includes the addition of a student gathering plaza spanning between the existing and proposed pedestrian bridges crossing the Sepulveda Channel.

Approvals required for the Windward School Master Plan Update Project include, but may not be limited to, the following:

- A Variance to allow the continuation of an existing private school use in the OS, R1V2, R3, and [Q]R3 zones and replacement and relocation of an existing pedestrian bridge associated with a private school use in the OS zone, previously authorized by Case No. ZA 98-0893-ZV-YV.
- A Variance to provide 150 parking spaces in lieu of the spaces required pursuant to Case No. ZA 98-0893-ZV-ZY and LAMC Section 12.21 A.4(e.
- Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.1, C.3, and C.5(b) for the northern portion of the Project Site.
- Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.2 and C.3 for the southern portion of the Project Site.
- Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the northern portion of the Project Site for structures in the R1V2 zone.
- Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the southern portion of the Project Site for structures in the R3 and [Q]R3 zones.
- Pursuant to Section 16.05 C.1(a) of the LAMC, Site Plan Review for a project that results in an increase of 50,000 gross square feet or more.
- In addition to the entitlements identified above, the following approvals are also required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.


| APPLICANT: | PREPARED BY: | ON BEHALF OF: |
|---|---|---|
| Windward School<br>11350 W. Palms Blvd.<br>Los Angeles, CA 90066 | Meridian Consultants LLC<br>920 Hampshire Rd., Ste. A5<br>Westlake Village, CA 91361 | City of Los Angeles<br>Department of City Planning<br>Environmental Analysis Section |


**February 2019**

# CITY OF LOS ANGELES

## CALIFORNIA ENVIRONMENTAL QUALITY ACT

**PROPOSED MITIGATED NEGATIVE DECLARATION**

| | | |
|---|---|---|
| LEAD CITY AGENCY:<br>City of Los Angeles, Department of City Planning | | COUNCIL DISTRICT:<br>CD 11 – Mike Bonin |
| **PROJECT TITLE:**<br>Windward School Master Plan Project | ENVIRONMENTAL CASE:<br>ENV-2018-4476-MND | CASE NOS:<br>2018-4475-ZV-ZAA-SPR |

**PROJECT LOCATION:** The Project is located at 11340-11350 Palms Boulevard, 3481-3485 Sawtelle Boulevard, and 11375 Westminster Avenue, in the City of Los Angeles, California 90066.

**PROJECT DESCRIPTION:** The Windward School is seeking to update its previously approved Windward School Master Plan (Master Plan) to implement a series of phased campus improvements and to request a phased increase in student enrollment of 35 students for a total capacity of 585 students with a total maximum enrollment of 625 (Project). The proposed improvements would include the demolition of various existing facilities, the upgrade and expansion of existing classrooms and educational facilities, as well as the construction a new performing arts facility. The Project is proposed in three phases, which in total would involve the total demolition of approximately 26,560 square feet of existing building area and the construction of approximately 54,260 net square feet of new building area. The Project would be implemented over a period of 6 years, with an estimated completion date of 2025.

The Applicant has requested that the City approve (1) a Variance to allow the continuation of an existing private school use of an existing private school use in the OS, R1V2, R3, and [Q]R3 zones and replacement and relocation of an existing pedestrian bridge associated with a private school use in the OS zone, previously authorized by Case No. ZA 98-0893-ZV-YV; (2) a Variance to provide 150 parking spaces in lieu of the spaces required pursuant to Case No. ZA 98-0893-ZV-ZY and LAMC Section 12.21 A.4(e); (3) Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.1, C.3, and C.5(b) for the northern portion of the Project Site; (4) Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.2 and C.3 for the southern portion of the Project Site; (5) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the northern portion of the Project Site for structures in the R1V2 zone; (6) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the southern portion of the Project Site for structures in the R3 and [Q]R3 zones; (7) Pursuant to Section 16.05 C.1(a) of the LAMC, Site Plan Review for a project that results in an increase of 50,000 gross square feet or more. In addition to the entitlements identified above, the following approvals are also required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY:

Windward School

11350 W. Palms Blvd.

Los Angeles, CA 90066

**FINDING:** The Department of City Planning of the City of Los Angeles has proposed that a Mitigated Negative Declaration be adopted for this project. The mitigation measures outlined on the attached pages will reduce any potentially significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED

| | | |
|---|---|---|
| Any written comment received during the public review period is attached together with the response of the Lead City Agency. The project decision-maker may adopt the Mitigated Negative Declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made. | | |
| THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED | | |
| NAME OF PERSON PREPARING FORM<br>Jordann Turner | TITLE<br>City Planner | TELEPHONE NUMBER<br>213 978-1365 |
| ADDRESS<br>200 N. Spring Street, 7th Floor<br>Los Angeles, CA 90012 | SIGNATURE (Official) | DATE |

# SUMMARY OF MITIGATION MEASURES

Aesthetics: No mitigation measures are required.

Agriculture and Forestry Resources: No mitigation measures are required.

Air Quality: No mitigation measures are required

Biological Resources:

**MM BIO-1:** Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

Project activities (including disturbances to native and nonnative vegetation, structures, and substrates) should take place outside of the breeding season for birds, which generally runs from March 1 to August 31 (and as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code, Section 86).

If Project activities cannot feasibly avoid the breeding season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Project Applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.

- If a protected native bird is found, the Project Applicant shall delay all clearance/ construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.

- Alternatively, the qualified biologist could continue the surveys to locate any nests. If an active nest is located, clearing and construction (within 300 feet of the nest or as determined by a qualified biological monitor) shall be postponed until the nest is vacated and juveniles have fledged, and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.

- The Project Applicant shall record the results of the recommended protective measures described previously to document compliance with applicable State and federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

Cultural Resources: No mitigation measures are required.

Geology and Soils: No mitigation measures are required.

Greenhouse Gas Emissions: No mitigation measures are required.

Hazards and Hazardous Materials: No mitigation measures are required.

Hydrology and Water Quality: No mitigation measures are required.

Land Use and Planning: No mitigation measures are required.

Mineral Resources: No mitigation measures are required.

Noise:

**MM NOI-1** Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously on the Project Site, which causes high noise levels (i.e., demolition activities would occur during summer when school is not fully operational).
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.

Population and Housing: No mitigation measures are required.

Public Services: No mitigation measures are required.

Recreation: No mitigation measures are required.

Transportation and Traffic: No mitigation measures are required.

Tribal Cultural Resources:

**MM-TCR-1** Tribal Cultural Resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

a. Upon a discovery of a potential tribal cultural resource, the project Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.

b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide the Gabrieleno Band of Mission Indians - Kizh Nation a reasonable period of time, not less than 7 days or more than 14 days, to conduct a site visit and make recommendations to the Project Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

c. The project Applicant shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

Utilities and Service Systems: No mitigation measures are required.

Mandatory Findings of Significance: Applicable mitigation measures have been stated above.

# Initial Study
# Windward School Master Plan Project
# City of Los Angeles

**Prepared for:**

City of Los Angeles
Department of City Planning

**Prepared by:**

Meridian Consultants LLC
920 Hampshire Road, Suite A5
Westlake Village, California 91361

**February 2019**

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# 1.0 INTRODUCTION

**Project Title:** Windward School Master Plan Project

**Project Location:** The Project Site is located at 11340-11350 Palms Boulevard, 3481-3485 Sawtelle Boulevard, and 11375 Westminster Avenue, in the City of Los Angeles, California 90066. The Project Site is bounded by Palms Boulevard to the north and Sawtelle Boulevard to the east; portions of the Project Site extend to Westminster Avenue to the south. To the west, the Project Site is bordered by residential uses located along Butler Avenue, and the Los Angeles County Flood Control District's Sepulveda Channel.

**Project Applicants:** Windward School
11350 W. Palms Blvd.
Los Angeles, CA 90066

**Lead Agency:** City of Los Angeles
Department of City Planning
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

## PROJECT SUMMARY

The Project would involve the implementation of a series of phased campus improvements and to request an increase in student enrollment by 35 students, from 550 to 585 students, and additional 40 student increase to a maximum of 625 students by 2022. The proposed improvements would include the upgrade and expansion of existing classrooms and educational facilities, as well as the construction a new performing arts facility. The Master Plan update is proposed in three phases and would be implemented over a period of 6 years, with an estimated completion date of 2025.

The Applicant has requested that the City approve (1) a Variance to allow the continuation of an existing private school use of an existing private school use in the OS, R1V2, R3, and [Q]R3 zones and replacement and relocation of an existing pedestrian bridge associated with a private school use in the OS zone, previously authorized by Case No. ZA 98-0893-ZV-YV; (2) a Variance to provide 150 parking spaces in lieu of the spaces required pursuant to Case No. ZA 98-0893-ZV-ZY and LAMC Section 12.21 A.4(e); (3) Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.1, C.3, and C.5(b) for the northern portion of the Project

Site; (4) Pursuant to Section 12.27 of the LAMC, a Variance to permit deviations from the required development standards established by LAMC Section 12.08 C.2 and C.3 for the southern portion of the Project Site; (5) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the northern portion of the Project Site for structures in the R1V2 zone; (6) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit various height and area modifications within the southern portion of the Project Site for structures in the R3 and [Q]R3 zones; (7) Pursuant to Section 16.05 C.1(a) of the LAMC, Site Plan Review for a project that results in an increase of 50,000 gross square feet or more. In addition to the entitlements identified above, the following approvals are also required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.

## ENVIRONMENTAL REVIEW PROCESS

This Initial Study is a preliminary analysis, prepared by and for the City of Los Angeles as the Lead Agency in compliance with the California Environmental Quality Act (CEQA), to determine whether an Environmental Impact Report (EIR), a Negative Declaration (ND), or a Mitigated Negative Declaration (MND) should be prepared for the Project. A MND is prepared when the Initial Study has identified potentially significant effects on the environment but (1) revisions in the project plans or proposals made by, or agreed to by, the Applicant before the proposed MND and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment. Consequently, the analysis contained herein concludes that a MND should be prepared for the Project.

## ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into six sections as follows:

**Section 1.0: Introduction,** provides introductory information such as the Project title, the Project Applicants, and the lead agency for the Project.

**Section 2.0: Existing Conditions***,* describes the existing conditions, surrounding land use, general plan, and existing zoning in the Project Site.

**Section 3.0: Project Description,** provides a detailed description of the Project, including the Project characteristics, related Project information, construction timeline, and environmental clearance requirements.

**Section 4.0**: **Initial Study Checklist**, includes the City of Los Angeles Initial Study Checklist showing the determination of the significance of potential environmental impacts of the Project.

**Section 5.0: Environmental Analysis,** includes discussion and analysis for each environmental topic and threshold listed in the Initial Study Checklist.

**Section 6.0: List of Preparers***,* identifies the individuals who prepared this report.

**Section 7.0: References:** identifies all printed references cited in this Initial Study.

**Appendices** include Project-specific reports and data used to support the analysis in this Initial Study.

# 2.0 EXISTING CONDITIONS

## 2.1 BACKGROUND

The Windward School is an independent, not-for-profit, college preparatory school that serves students in grades 7–12 by providing a dynamic, engaging education. The Windward School campus has a permitted enrollment of 500 students, although it exhibits an existing enrollment of 585 students.

The Windward School has operated in its current location at the southwest corner of Palms Boulevard and Sawtelle Boulevard since 1982. Over the past 35 years, the School has gradually expanded and improved its campus, including property leased from the City of Santa Monica. The Windward School campus includes northern and southern portions of campus joined by a Los Angeles County Flood Control District flood channel known as the Sepulveda Channel. Windward also owns a parcel adjoining its campus currently developed with a 2-story apartment building and surface parking lot.

In May of 1999, Windward School was granted approval of a Master Plan to improve its campus in a two-phase development project by Case No. ZA-98-0893-ZV-YV. The first phase of the approved Master Plan consisted of 55,251 square feet of new construction, including new classrooms, a library, a visual arts pavilion, administrative offices, and upgrades to existing school facilities. Upon completion of the first phase of the Master Plan development, the Windward School facilities on the northern and southern portion of campus totaled 90,147 square feet.

The second phase of the approved Master Plan included 60,608 square feet of new construction to build new auditorium and gymnasium facilities, along with the removal of an existing apartment building owned by Windward School. The apartment building has not yet been removed, and the approved improvements have not yet been built. Over the course of time since that approval was granted, the Windward School has determined that the improvements approved for the second phase of its Master Plan no are no longer compatible with its needs and its vision for the Windward School campus and accordingly commenced the planning process for this updated version of its Master Plan.

## 2.2 PROJECT LOCATION

The Project is in the Palms-Mar Vista-Del Rey Community Plan area of the City of Los Angeles, as shown in **Figure 2.0-1: Regional and Vicinity Map**. The Project Site is bounded by Palms Boulevard to the north and Sawtelle Boulevard to the east; portions of the Project Site extend to Westminster Avenue to the south. To the west, the Project Site is bordered by residential uses located along Butler Avenue, and the Los Angeles County Flood Control District's Sepulveda Channel. The Project location is shown in **Figure 2.0-2: Aerial Photograph of the Project Site**.

## 2.3 EXISTING SITE CONDITIONS

The Project Site is approximately 401,625 square feet (9.22 acres) in size and is currently developed with the Windward School campus and an existing apartment building owned by the Windward School. As shown in **Figure 2.0-3: Existing Project Site Plan**, the Project Site consists of 15 one- and two-story educational, administrative, and recreational buildings, and a two-story apartment building for a total of approximately 103,750 square feet of development. The Project Site comprises a northern and southern portion, connected by two pedestrian bridges that extend across the Sepulveda Channel.

The northern portion of the Project Site is approximately 65,160 square feet (1.50 acres) in size with frontage along Palms Boulevard. This portion of the Project Site is developed with 1- and 2-story classroom buildings, administrative offices, and other educational facilities including a small black-box theater and a surface parking lot. In total, these existing school facilities on the northern portion of the Project Site comprise approximately 22,870 square feet of development.

The southern portion of the Project Site is approximately 336,465 square feet (7.72 acres) in size with frontages along Sawtelle Boulevard, Westminster Avenue, and Butler Avenue. The majority of the southern portion of the Project Site is leased from the City of Santa Monica, as shown in **Figure 2.0-4: Project Site Ownership Status**. This portion of the Project Site is developed with 1- and 2-story classroom buildings, administrative offices, and other educational facilities including a gymnasium and athletic fields, and a surface parking lot. These existing school facilities on the southern portion of the Project Site comprise approximately 67,280 square feet of development. In addition, this portion of the Project Site also contains an existing 2-story apartment building consisting of approximately 13,600 square feet of building area. The existing apartment building contains 20 dwelling units.

The current addresses for the Project Site include 11340-11350 Palms Boulevard, 3481-3485 Sawtelle Boulevard, and 11375 Westminster Avenue. The Project Site comprises a total of 25 parcels identified by Assessor's Parcel Numbers (APN) 424-902-6027 and -28, and 424-902-6270 through -92, as shown in **Figure 2.0-5: Existing Zoning and Parcels Map.**

## 2.4 ZONING AND LAND USE DESIGNATIONS

As shown in **Figure 2.0-6: Palms-Mar Vista-Del Rey Community Plan Map**, the Project is in the Palms-Mar Vista-Del Rey Community Plan Area. The Palms-Mar Vista-Del Rey Community Plan designates the Project Site as Open Space, Residential Single Family, and Residential Multiple Family. The northern portion of the Project Site is zoned R1V2 (One-Family Zone). The southern portion of the Project Site, across from the Sepulveda Channel, is zoned OS-1XL (Open Space Zone) and [Q]R3-1 (Multiple Dwelling Zone). Pursuant to LAMC Sections 12.04.05, 12.08, and 12.10 private school uses are not permitted in the R-1,

R-3, and OS-1 zones, respectively. However, the Windward School was previously granted a zone variance to operate a private school in the R-1, R-3, and OS-1 zones, approved by the Zoning Administrator through Case No. ZA-98-0893-ZV-YV in May 1999. In addition, the Los Angeles City Council adopted Ordinance Nos. 184802 and 184814 in April 2017 to update its Baseline Mansionization Ordinance and implement new standards for properties under an R-1 zoning designation in certain Community Plan areas, including the Palms-Mar Vista Del Rey Community Plan Area. As a result, the parcel that makes up the northern portion of the Project Site owned by the Windward School was changed to a new R1V2 designation. This new R1V2 designation includes new development standards related to height, residential floor area, encroachment plane, offset/plane break, and yard setbacks. The parcel of the Project Site that is currently developed with an apartment building is zoned as R-3, with the portion of that parcel developed with a surface parking lot zoned as [Q]R-3. The [Q] Condition limits the use of that portion of the parcel to surface parking for the adjacent residential use.

## 2.5 SURROUNDING LAND USES

The Project Site is in an urbanized area of Los Angeles. Surrounding uses include a mix of open space and residential uses. To the north across Palms Boulevard is the 18.5-acre Mar Vista Recreation Center, which consists of an indoor recreational facility, baseball fields, basketball, volleyball, and tennis courts, children play areas, multipurpose sports fields, and synthetic fields. To the west and south are single- and multistory residential buildings, as well as the Sepulveda Channel which bisects the Project Site from the southwest to northeast. To the east are multistory multifamily residential buildings.

## 2.6 ACCESS

### Regional Access

Primary regional access to the Project Site is provided by Interstate 405 (I-405), which runs in a north–south direction east of the Project Site, and Interstate 10 (I-10) which runs in an east–west direction to the north of the Project Site. Additional regional access to the Project Site is provided by California State Route 1 (SR 1) which generally runs in a north–south direction to the west of the Project Site.

### Local Street Access

Local street access is provided by a grid roadway system encompassing the Project Site and surrounding area. Palms Boulevard, which borders the Project Site to the north, runs in an east–west direction along the Project Site. Palms Boulevard generally provides two travel lanes in each direction and is classified as an Avenue I, a Secondary Highway which are that typically located in parts of the City with dense active

uses, an active pedestrian environment, and a limited demand for new development.[2] Sawtelle Boulevard, east of the Project Site, runs in a north–south direction, with generally two travel lanes in each direction. It is classified as a Boulevard II, which is a Major Highway Class I.

## Public Transit

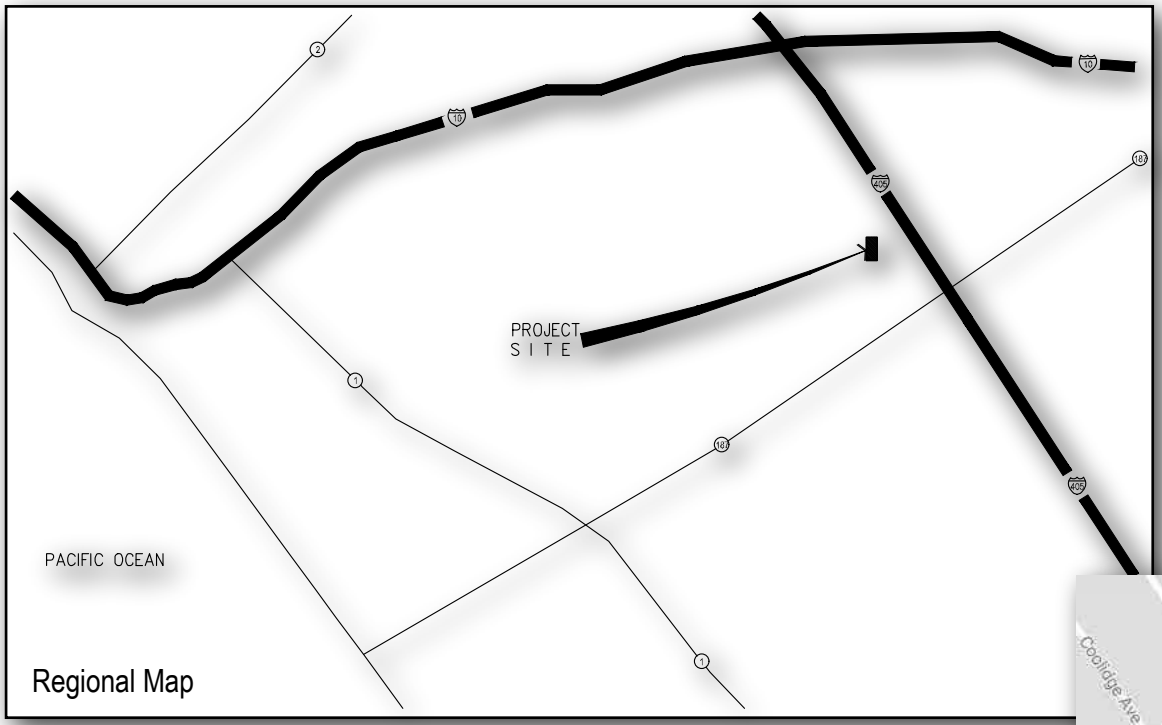
The Project Site is well served by both regional and local public transit. Specifically, the Los Angeles County Metropolitan Transportation Authority ("Metro"), the Culver City Bus, and the City of Santa Monica Big Blue Bus provide access to and from the Project area. The Metro Bus Line 33 runs along Venice Boulevard, with a stop at the intersection of Sawtelle Boulevard and Venice Boulevard.[3] The Culver City Bus Line 6 runs along Sepulveda Boulevard, with a stop at the intersection of Palms Boulevard and Sepulveda Boulevard.[4] The City of Santa Monica Big Bus Line 17 runs along Sawtelle Boulevard, with a stop at the intersection of Palms Boulevard and Sawtelle Boulevard.[5]

2 City of Los Angeles, *City of Los Angeles General Plan*, "Mobility Plan 2035" (2015), Citywide General Plan Circulation System Map A3—West Subarea.

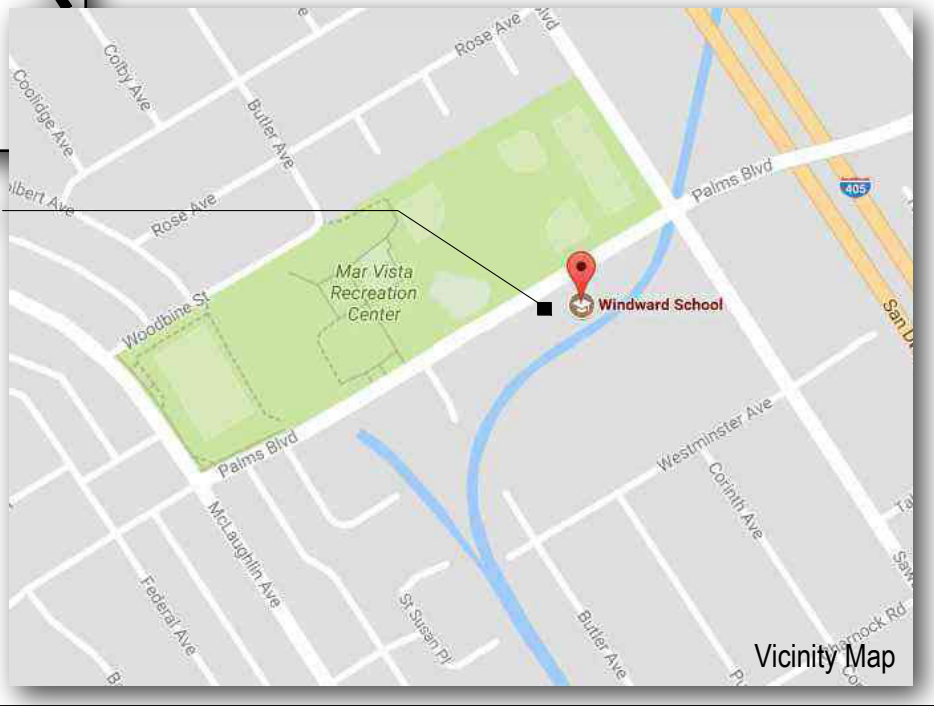
3 Metro, "Maps & Timetables," http://www.metro.net/riding/maps/, accessed August 2018.

4 City of Culver City, "Culver City Bus, Line 6–Sepulveda Blvd," https://www.culvercity.org/how-do-i/find/culver-city-bus/maps-bus-stops-schedules/line-6-sepulveda-blvd, accessed August 2018.

5 Big Blue Bus, "Route 17, UCLA-VA Medical Center-Palms," https://www.bigbluebus.com/Routes-and-Schedules/Route-17.aspx, accessed August 2018.




PROJECT SITE




**NOT TO SCALE**

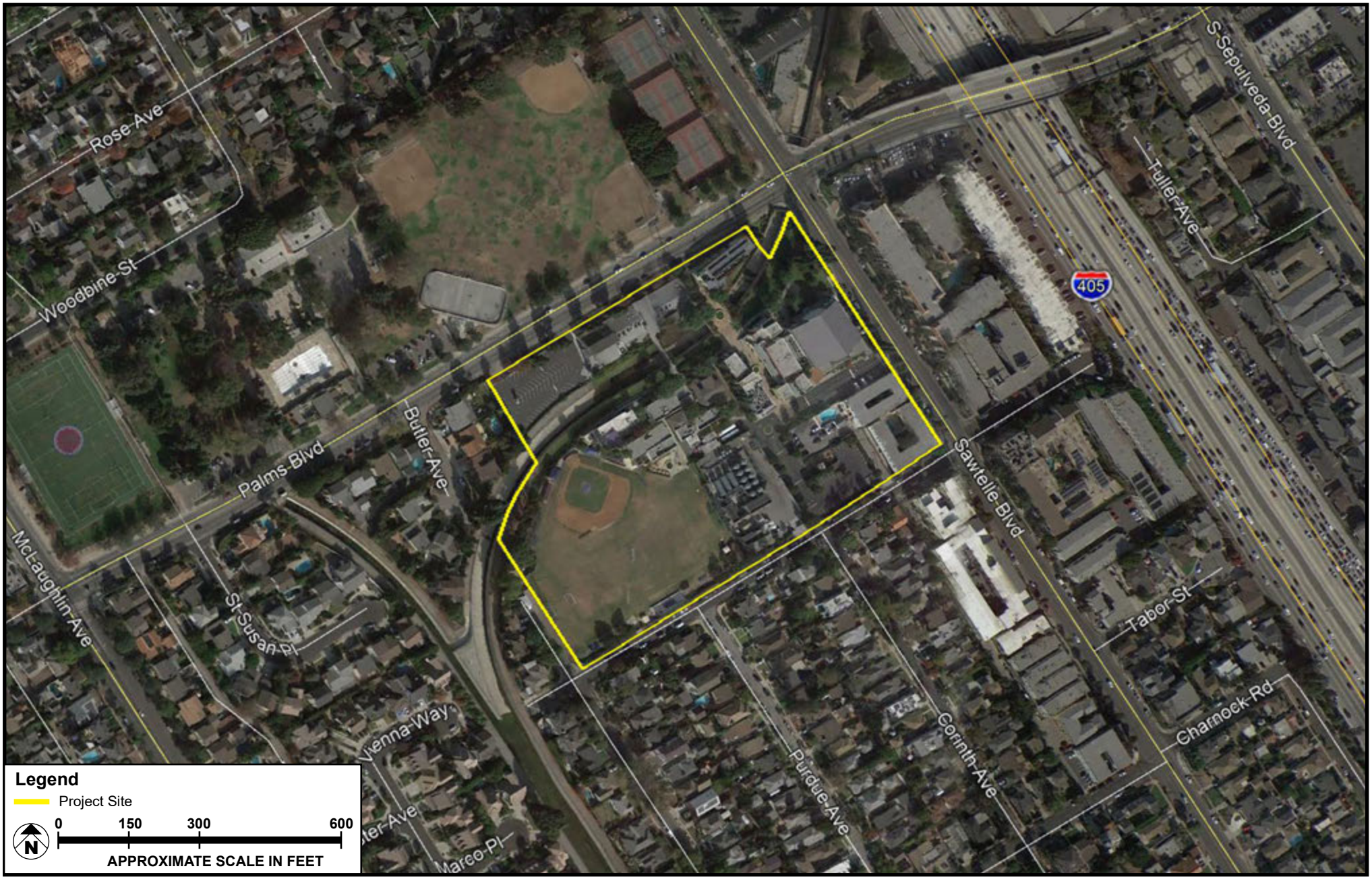
**SOURCE:** Google Earth - 2018

FIGURE **2.0-1**

Meridian Consultants

# Regional and Vicinity Map

177-001-17



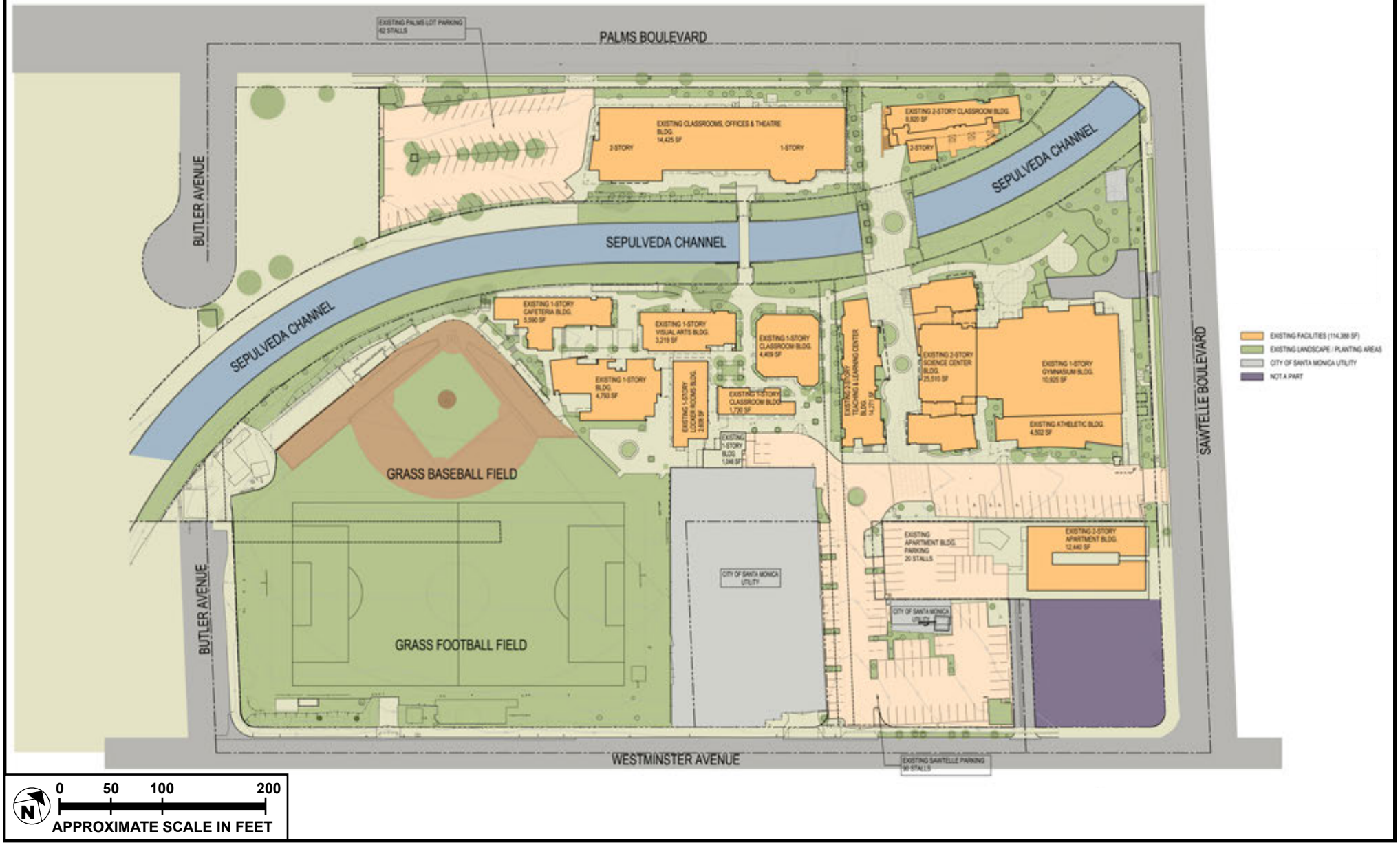

**SOURCE:** Google Earth - 2019

FIGURE **2.0-2**

Meridian Consultants

Aerial Photograph of the Project Site

177-001-17



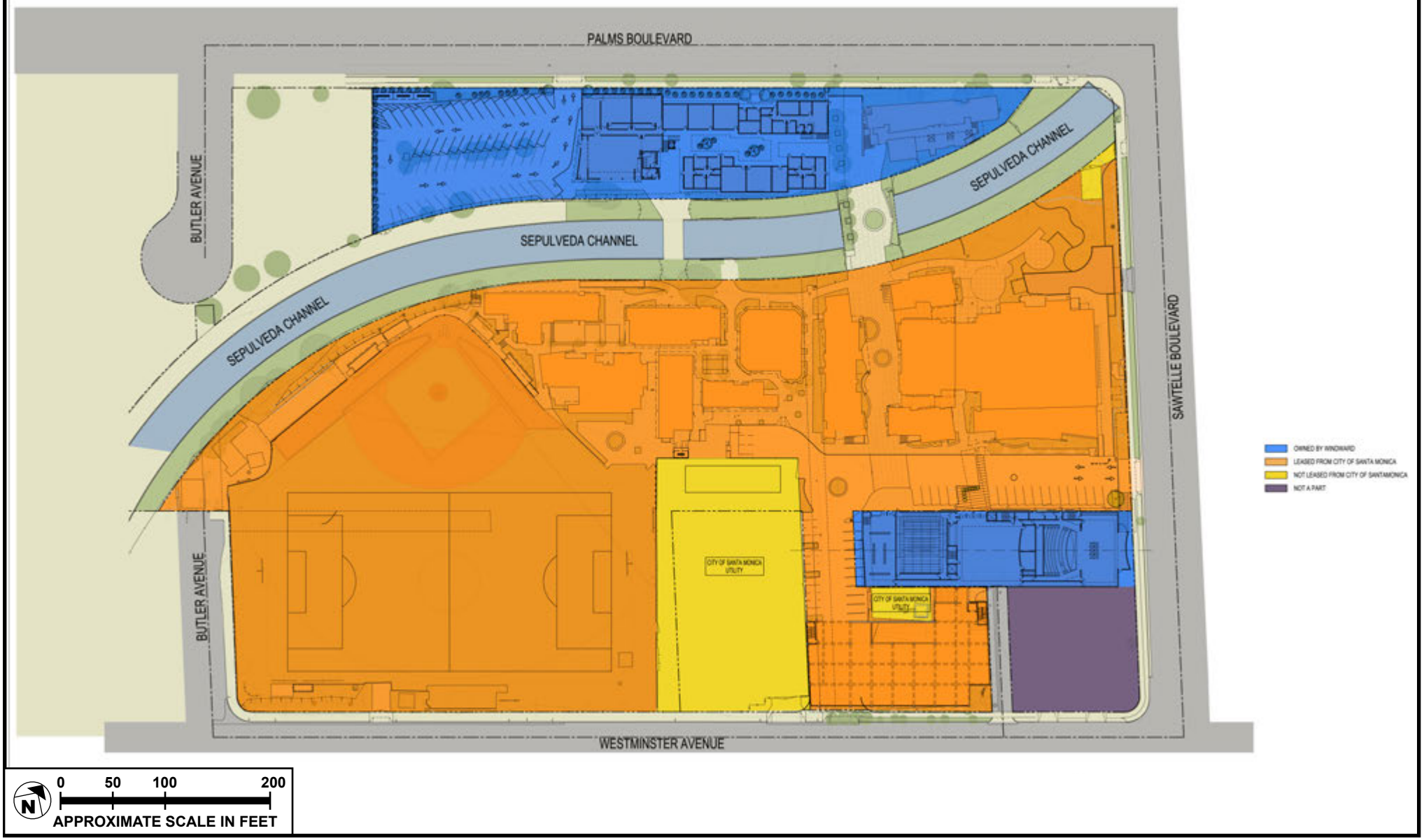

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **2.0-3**

Meridian Consultants

# Existing Project Site Plan

177-001-17



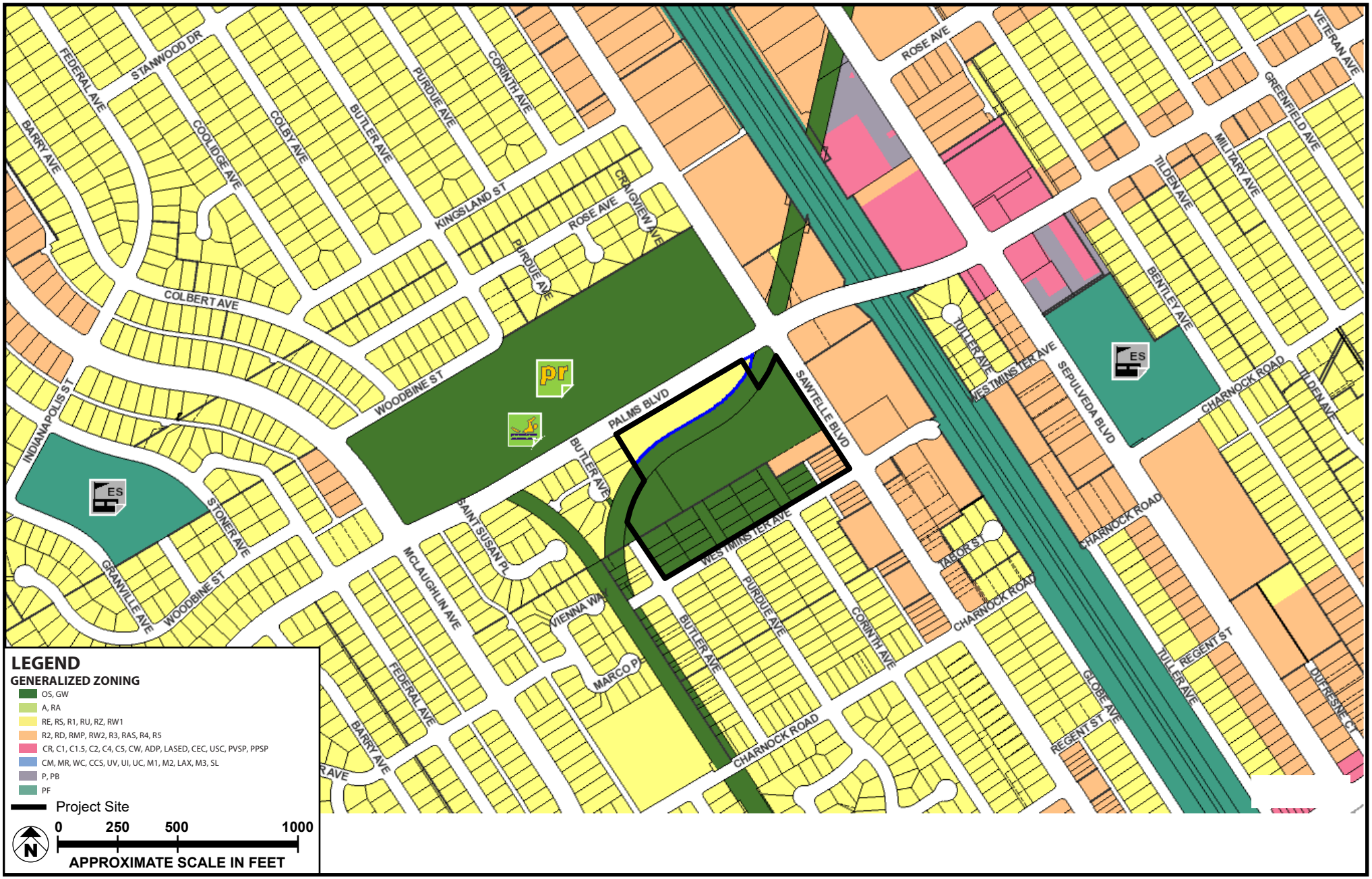

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **2.0-4**

Meridian Consultants

Project Site Ownership Status

177-001-17




**SOURCE:** ZIMAS - 2018

FIGURE **2.0-5**

Meridian Consultants

# Existing Zoning and Parcels Map

177-001-17


**SOURCE:** ZIMAS - June 2007

FIGURE **2.0-6**

Meridian Consultants

# Palms - Mar Vista - Del Rey Community Plan Map

177-001-17

# 3.0 PROJECT DESCRIPTION

## 3.1 PROJECT CHARACTERISTICS

The Project involves the implementation of a series of phased campus improvements and an increase in student enrollment by 35 students, from 550 to 585 students, and additional 40 student increase to a maximum of 625 students by 2022. The Windward School is proposing to update its previously approved Master Plan to upgrade and expand some of its existing classrooms and educational facilities, construct a new performing arts facility, and increase its enrollment to allow the school to continue to provide an excellent educational experience for its students. The proposed improvements would include the demolition of various existing facilities, the upgrade and expansion of existing classrooms and educational facilities, as well as the construction a new performing arts facility. Implementation of the Project would provide the Windward School with the ability to meet the immediate and long-term educational needs of the campus community. This Project improves upon that previously-approved development, and reflects changes made in response to valuable feedback Windward School received from its neighbors and the surrounding community regarding the second phase of the Master Plan.

The Project would in total would involve the demolition of approximately 26,560 square feet of existing building area and the construction of approximately 55,071 net square feet of new building area, as shown in **Table 3.0-1: Project Summary**.

**Table 3.0-1**
**Project Summary**

| Project Component | Use | Approximate Building Area (sq. ft.) |
|---|---|---|
| Existing Building Area | School Facilities | 90,147 |
| | Apartment Building | 13,596 |
| | **Total Existing** | **103,743** |
| Removal/Demolition | Classroom, Black Box Theater, Administration Building | (12,964) |
| | Apartment Building | (13,596) |
| | **Total Removal/Demolition** | **(26,560)** |
| New Construction | Classroom, Theater, Administration Building | 25,192 |
| | Arts and Innovation Center | 58,351 |
| | **Total New Construction** | **83,543** |
| | **Net New Construction** | **55,071** |

*Source: Windward School, 2018*

The Project is proposed in three phases, which would be implemented over a period of 6 years with an estimated completion date of 2025. A description of each of three proposed Phases is discussed below.

## *Phase 1*

As shown in **Figure 3.0-1: Phase 1 Site Plan**, the proposed improvements in Phase 1 include the repurposing of the existing apartment building for temporary office uses during the construction of the new classroom and administration buildings north of the Sepulveda Channel; and the placement of temporary modular classroom area in the apartment building parking lot area in the southern portion of the Project Site. Partial demolition of the existing classroom/administration building located to the north of the Sepulveda Channel would also occur during this Phase. The existing pedestrian bridge that currently spans across the Sepulveda Channel would be removed and replaced with a new pedestrian bridge, as shown in **Figure 3.0-2: Phase 1—Pedestrian Bridge Floor Plan**.

As shown in **Figure 3.0-1,** Phase 1 also includes the renovation and expansion of the existing classroom, office, and theater building within the norther portion of the Project Site, including renovation of the existing black box theatre. Phase 1 would then remove the temporary modular classroom area once the renovation and construction of the new buildings are complete.

Phase 1 would result in the demolition of 12,964 square feet of existing building area and the construction of approximately 25,192 square feet of new building area. In addition, the proposed classroom and administration buildings would not exceed 33 feet in height, as shown in **Figure 3.0-3a** and **Figure 3.0-3b: Building Elevations–Phase 1, Classroom and Administration Buildings**.

## *Phase 2*

As shown in **Figure 3.0-4: Phase 2 Site Plan,** Phase 2 of the Project involves the demolition of the existing apartment building and the construction of an approximatively 58,351-square-foot performing arts facility (also known as the Arts and Innovation Center). Phase 2 also involves the construction of a pedestrian bridge connecting the new Center to the existing gym on the Project Site.

The Arts and Innovation Building would consist of a performing arts facility that would include a 250-seat auditorium and a theater space with capacity for 189 seats. As shown in **Figure 3.0-5a** and **Figure 3.0-5b: Building Elevations–Phase 2, Arts and Innovation Center**, the structure would be a maximum of approximately 52 feet in height and would be connected by the proposed pedestrian footbridge to the existing gymnasium and science center educational facilities on the Project Site. Phase 2 would result in the demolition of 13,596 square feet of existing building area.

## *Phase 3*

Phase 3 of the Project includes the construction of a student gathering plaza spanning between the existing and proposed pedestrian bridges crossing the Sepulveda Channel, as shown in **Figure 3.0-6: Phase 3 Site Plan**. Comprising an area of approximately 4,065 square feet, the student gathering plaza would be characterized as a landscaped area between the existing and proposed pedestrian bridges that would connect the Project Site over the Sepulveda Channel. The plaza would provide a student gathering space convenient to facilitate outdoor learning opportunities. Two concrete paths would provide the main points of access from the south portion of the Project Site onto the plaza. Phase 3 would not involve the addition of any new building floor area on the Project Site.

## *Enrollment Increase*

The Windward School currently operates under a maximum enrollment of 550 students pursuant to a condition of the operating approval under Case No. ZA-98-0983-ZV-YV. The Windward School requests to increase the permitted enrollment to 585 students as part of the Project, which would functionally result in an average daily attendance of approximately 550 students. The Windward Schools also requests to increase an ultimate maximum enrollment of up to 625 students upon the completion of the proposed improvements in 2022, provided that the Windward Schools implements transportation demand management measures to ensure that any increase in actual enrollment above 585 students does not result in any new trip generation.

## *Access, Circulation, and Parking*

Access to the Project Site would continue to be maintained from Palms Boulevard and Sawtelle Boulevard, which is provided through ingress/egress driveways to the onsite surface parking lots. The Project Site currently contains 152 parking spaces between two surface parking lots—one accessed from Sawtelle Boulevard within the southern portion of the site and the other accessed from Palms Boulevard within the northern portion of the site. In the Spring of 2018, the Windward School anticipates the reconfiguration of the existing surface parking lot within the northern portion of the Project Site to maximize the circulation efficiency, resulting in a total number of 150 parking spaces on the site.

## *Pedestrian Circulation*

To improve the connectivity between the northern and southern portions of the Project Site, Phase 1 of the Project includes the removal and replacement of an existing pedestrian bridge across the Sepulveda Channel. The proposed replacement pedestrian bridge would be broader to allow more students, faculty, and staff to cross between the northern and southern portions of the Project Site.

### *Landscaping and Outdoor Improvements*

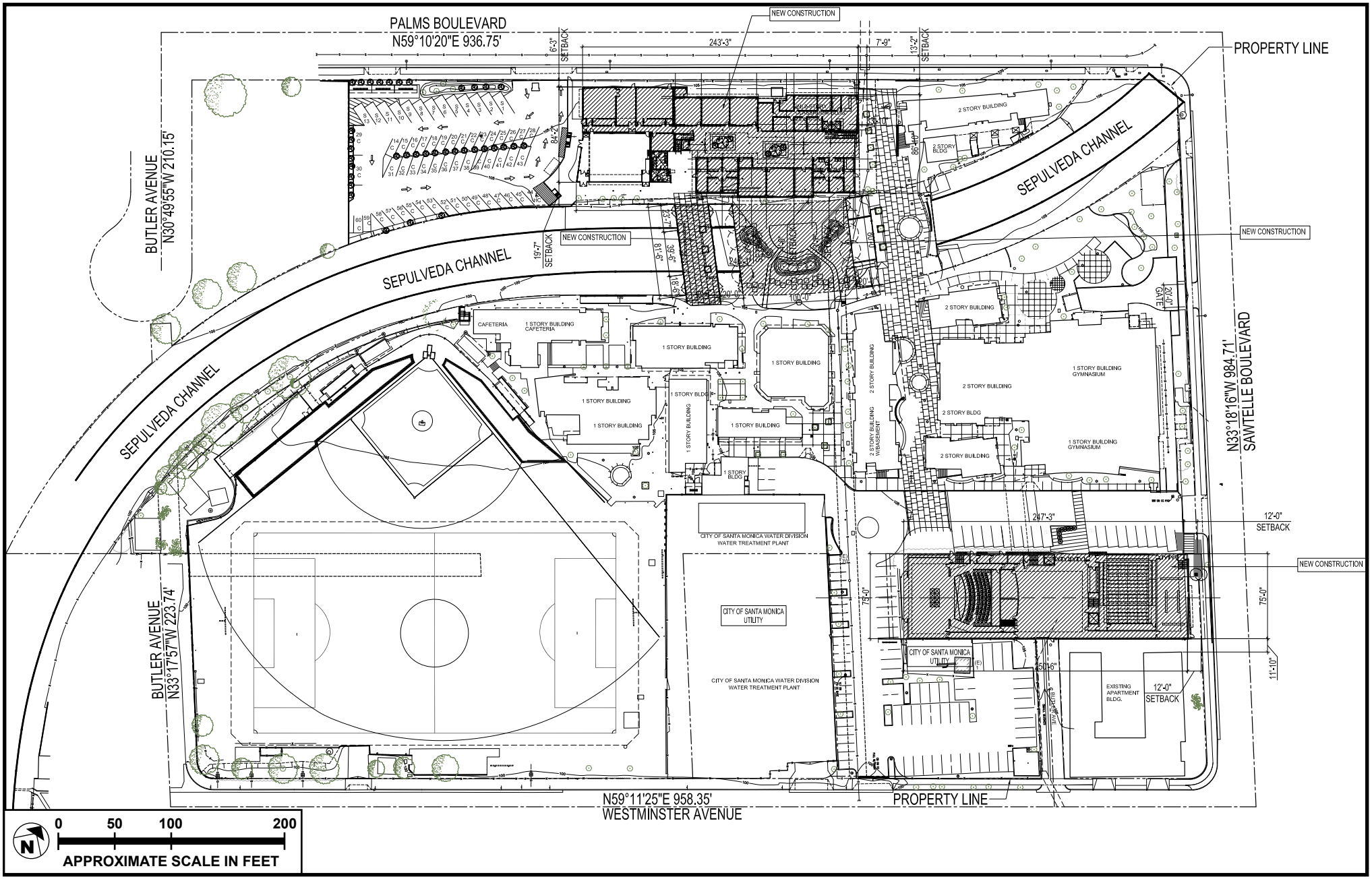
The Project would also implement various landscaping and other associated outdoor improvements, totaling approximately 41,690 square feet, to enhance the sustainability of the campus. As shown in **Figure 3.0-7: Proposed Landscaping Plan**, these proposed landscaping improvements would include the addition of drought-tolerant landscaping throughout the Project Site. **Figure 3.0-6** also illustrates the landscaping comprising the student gathering plaza proposed under Phase 3 of the Project. As previously described, the student gathering plaza would span across the Sepulveda Channel between existing and proposed pedestrian bridges. Landscaping on the Project Site would be characterized by trees, vines, shrubs and groundcover, and grasses.

## 3.2 APPROVAL ACTIONS

To implement the Project, the Applicant is requesting that the City take the following actions:

1) Pursuant to LAMC Section 12.27, a Variance to allow the continuation of an existing private school use in the OS, R1V2, R3, and [Q]R3 zones and replacement and relocation of an existing pedestrian bridge associated with a private school use in the OS zone, previously authorized by Case No. ZA 98-0893-ZV-YV;
2) Pursuant to LAMC Section 12.27, a Variance to provide 150 parking spaces in lieu of the spaces required pursuant to Case No. ZA 98-0893-ZV-ZY and LAMC Section 12.21 A.4(e);
3) Pursuant to Section 12.27 of the LAMC, a Variance to permit the following (Northern Portion of Project Site):
    - Residential Floor Area of 0.57 in lieu of the 0.45 maximum for a structure in the R1V2 zone as required by LAMC Section 12.08 C.5(b) and Table 12.08 C.5(b)
    - Front yard setback of 6 feet in lieu of the required 25% of lot depth up to 20 feet for a structure in the R1V2 zone per LAMC Section 12.08 C.1.
    - Rear yard setback of 3’8” in lieu of the required 15 feet for a structure in the R1V2 zone per LAMC Section 12.08 C.3.
4) Pursuant to Section 12.27 of the Los Angeles Municipal Code, a Variance to permit the following (Southern Portion of Project Site):

- Construction of an educational facility for private school use in lieu of parking for adjacent residential uses as required by City of Los Angeles Ordinance No. 171000.
- A side yard setback of 0 feet in lieu of the required 5 feet for a structure in the R3 and [Q]R3 zone per LAMC Section 12.10 C.2.
- A rear yard setback of 8’2” in lieu of the required 15 feet for a structure in the R3 zone and [Q]R3 per LAMC Section 12.10 C.3.



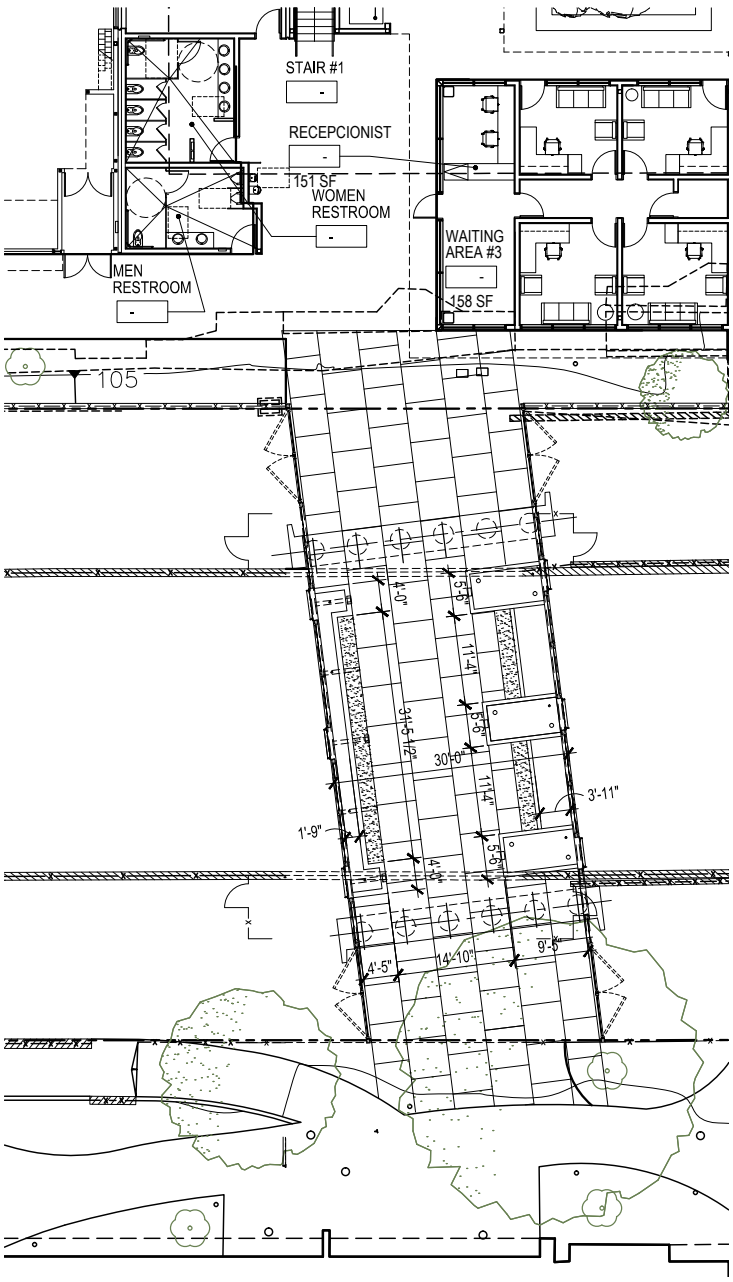

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-1**

Meridian Consultants

# Phase 1 Site Plan

177-001-17




0 10 20 40

APPROXIMATE SCALE IN FEET

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

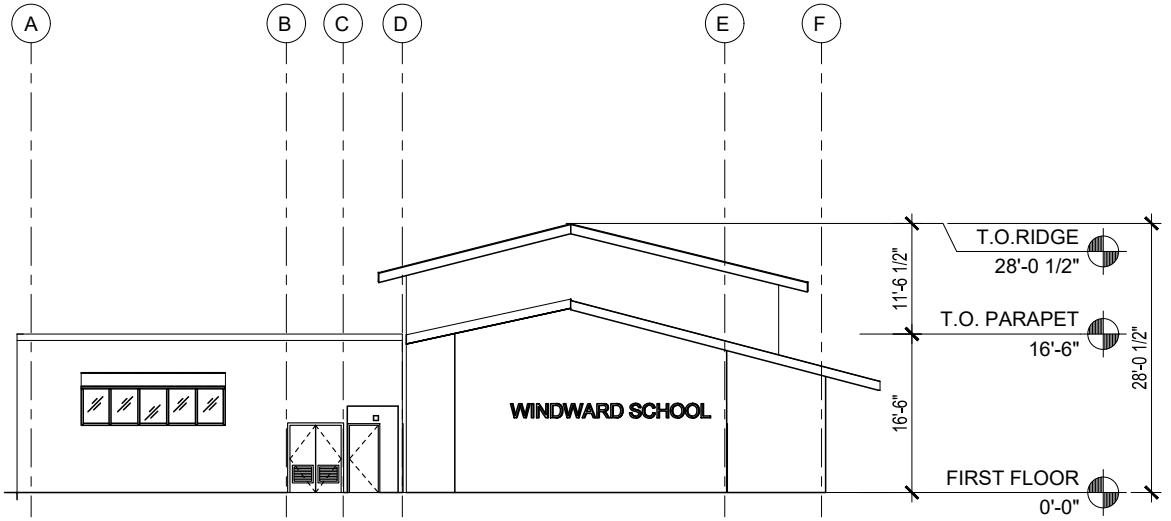
FIGURE **3.0-2**

Meridian Consultants

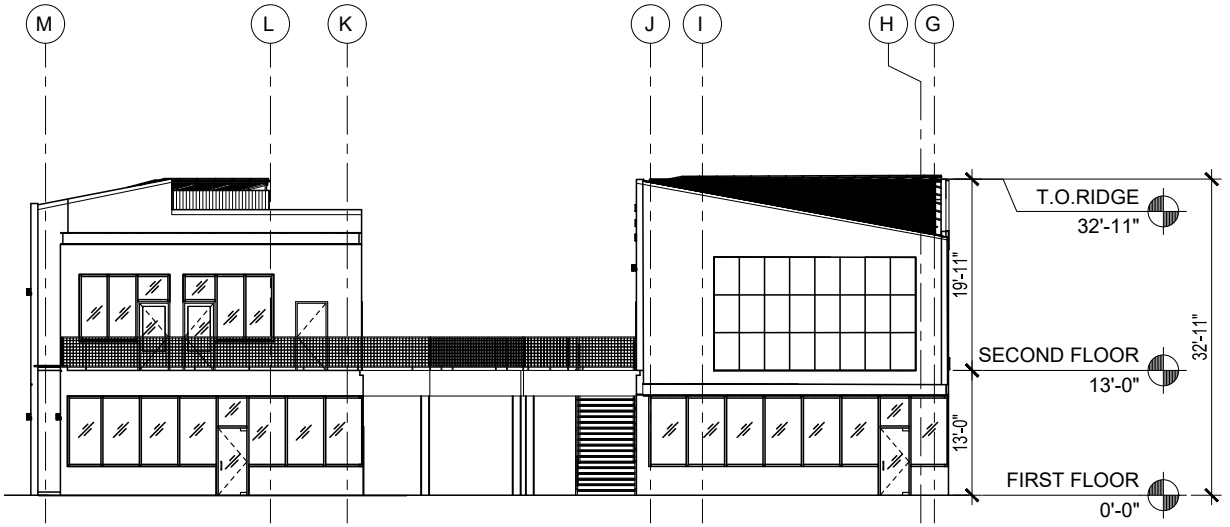
# Phase 1—Pedestrian Bridge Floor Plan

177-001-17

## CLASSROOM & ADMIN BUILDING
## WEST ELEVATION




## CLASSROOM & ADMIN BUILDING
## EAST ELEVATION



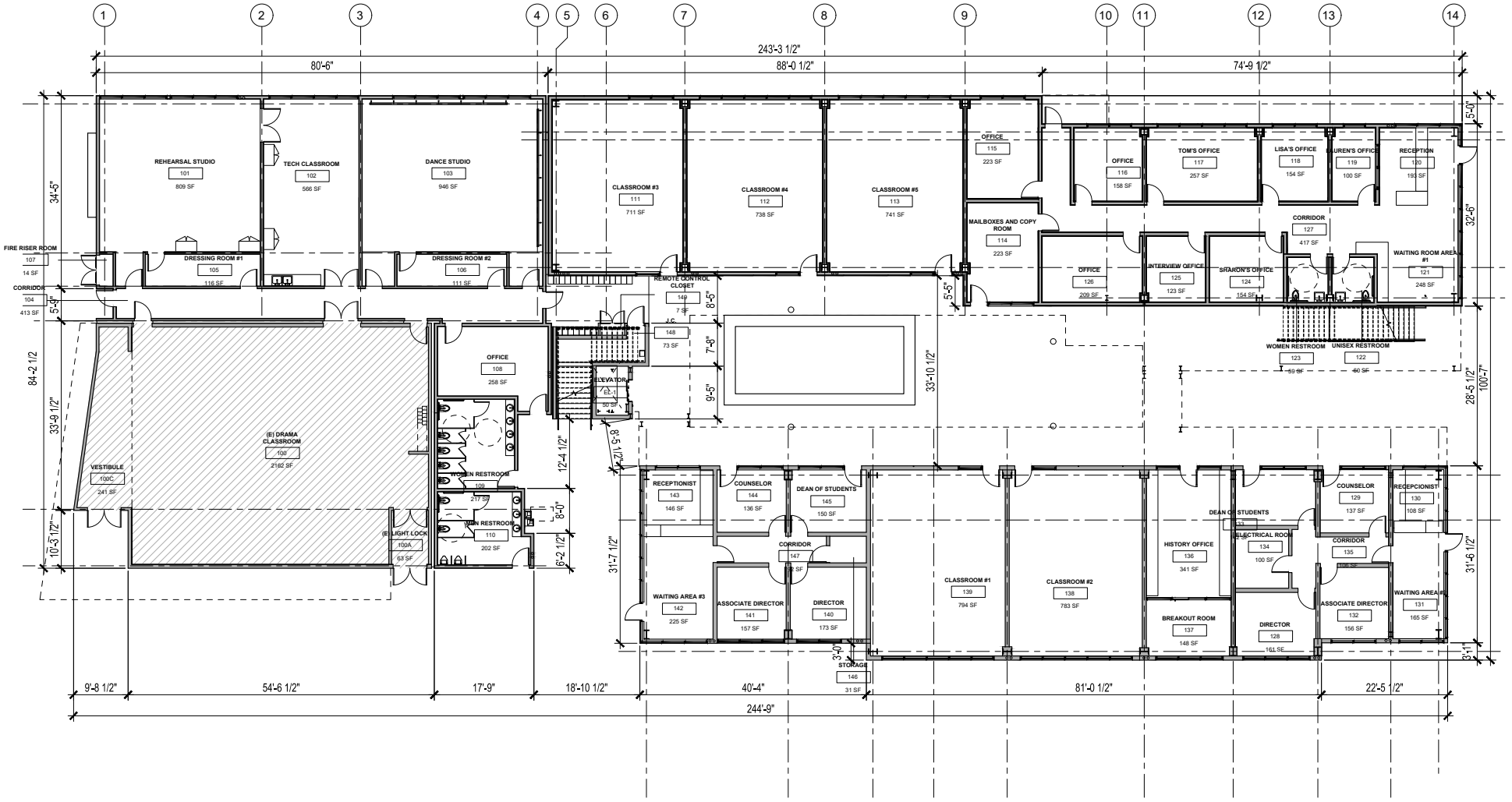

0 7.5 15 30
APPROXIMATE SCALE IN FEET

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-3a**

Meridian Consultants

Building Elevations–Phase 1, Classroom and Administration Buildings




CLASSROOM & ADMIN BUILDING
FIRST FLOOR PLAN

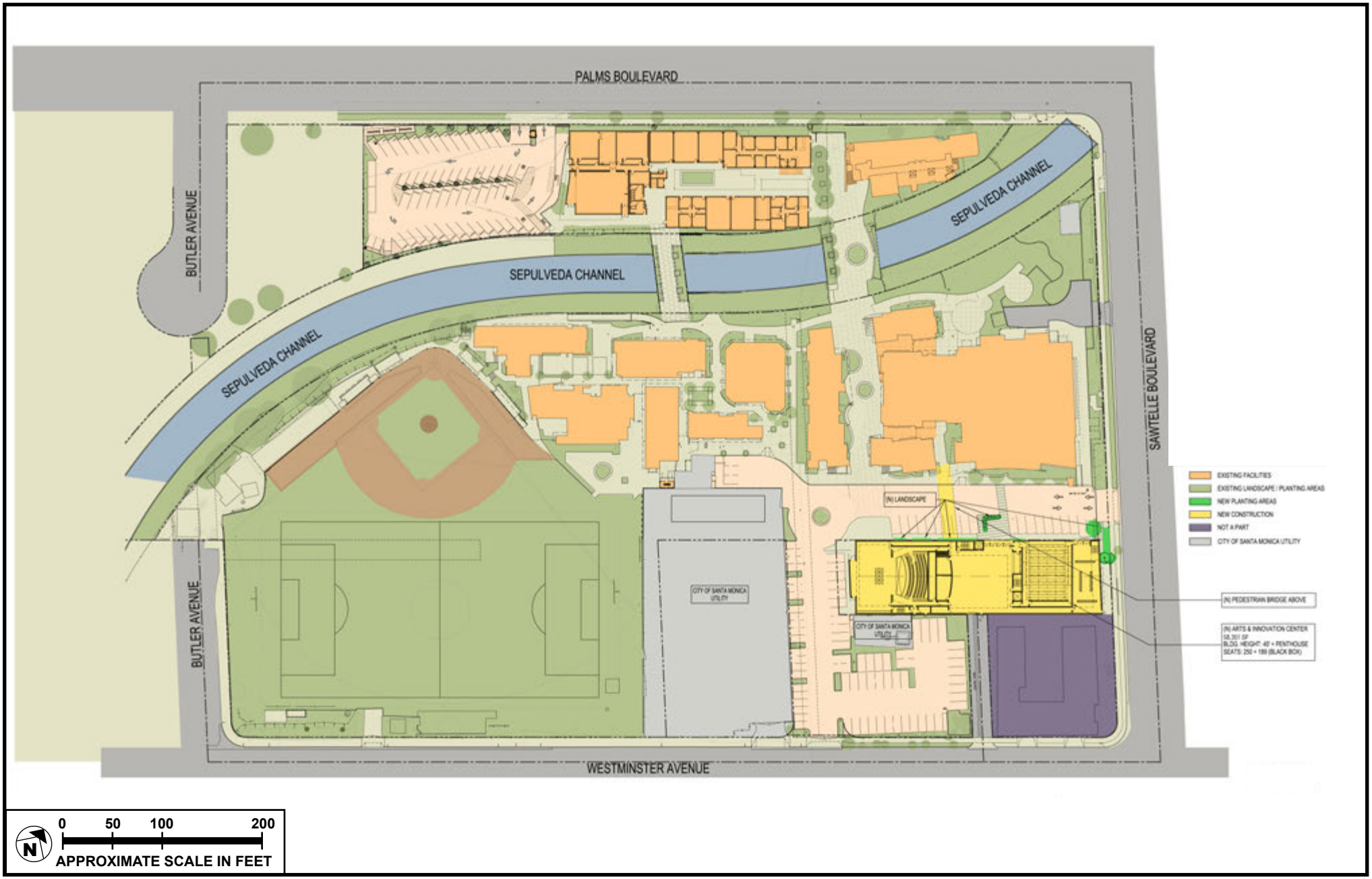
0 12.5 25 50
APPROXIMATE SCALE IN FEET

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-3b**

Meridian Consultants

# Building Elevations–Phase 1, Classroom and Administration Buildings



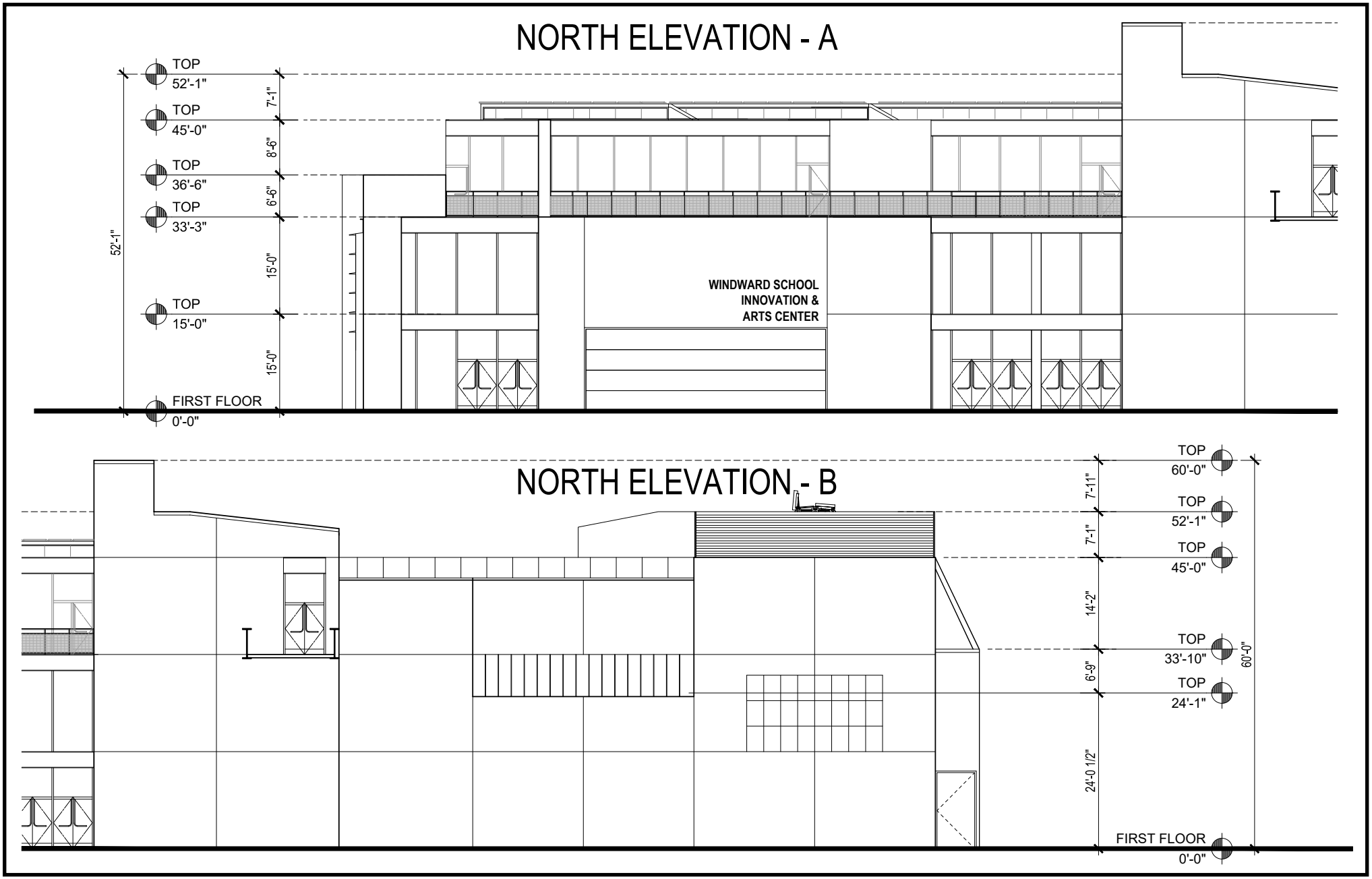

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-4**

Meridian Consultants

# Phase 2 Site Plan

177-001-17




**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-5a**

Meridian Consultants

Building Elevations–Phase 2, Arts and Innovation Center

177-001-17

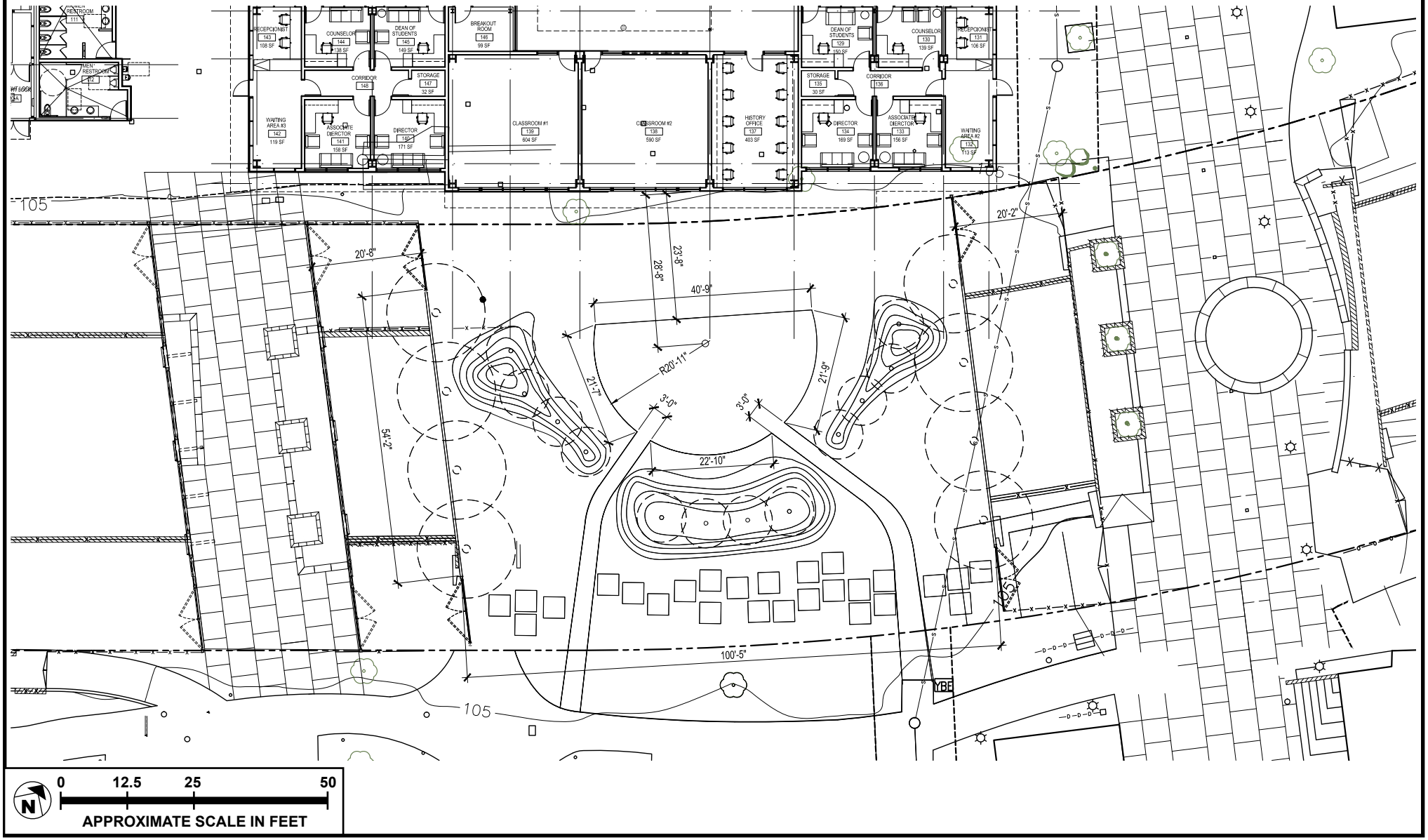

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-5b**

Meridian Consultants

Building Elevations–Phase 2, Arts and Innovation Center

177-001-17



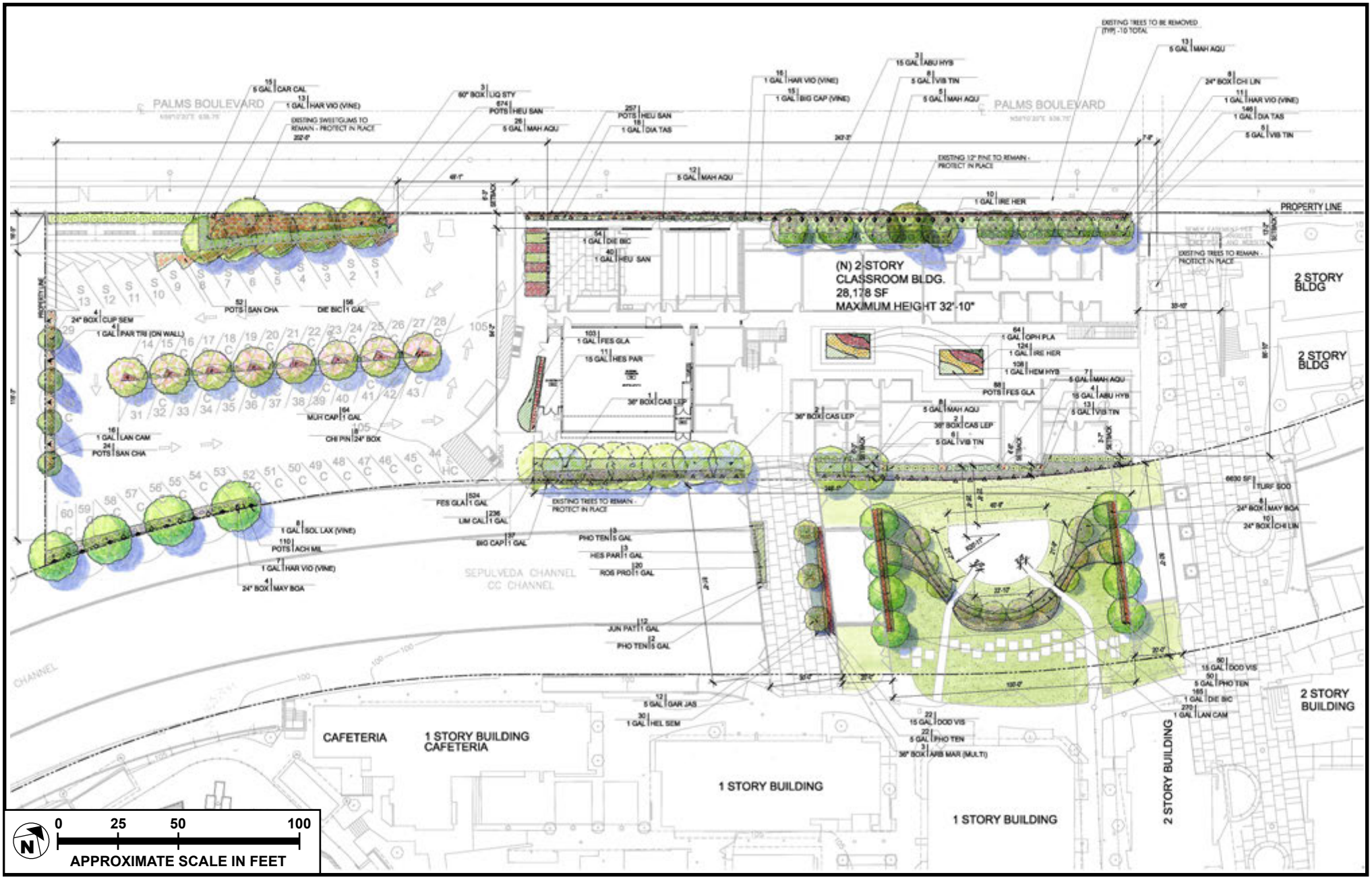

**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-6**

Meridian Consultants

# Phase 3 Site Plan

177-001-17




**SOURCE:** John Sergio Fisher & Associates Inc. - 2019

FIGURE **3.0-7**

Meridian Consultants

# Proposed Landscaping Plan

177-001-17

5) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit the following height and area modifications for a structure in the R1V2 zone (Northern Portion of Project Site):

   - Modification from LAMC Section 12.08 C.5(b) and Table 12.08 C.5(b) to permit a maximum height of 32' 10" in lieu of the 30-foot maximum.
   - Modification from LAMC Section 12.08 C.5(b) and Table 12.08 C.5(b) to permit structures within the R1V2 encroachment plane.
   - Modification from LAMC Section 12.08 C.2(a) to allow a side wall exceeding 14 feet in height and a continuous length greater than 45 feet without the required offset/plane break that is a minimum depth of 5 feet beyond the required yard and a minimum of 10 feet.

6) Pursuant to Section 12.28, a Zoning Administrator Adjustment to permit the following height and area modifications for a structure in the R3 and [Q]R3 zones (Southern Portion of Project Site):

   - Modification from LAMC Section 12.10 C.1 to allow a front yard setback of 10'6" in lieu of the 15-foot minimum.
   - Modification from LAMC Section 12.21.1 to allow for maximum height of 52'1" in lieu of the 45-foot maximum.

7) Pursuant to Section 16.05 C.1(a) of the Los Angeles Municipal Code, Site Plan Review for a project that results in an increase of 50,000 gross square feet or more.

In addition to the entitlements identified above, the following approvals are also required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Department of Building and Safety and Public Works (and other municipal agencies) for Project construction activities including, but not limited to the following: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of trees on public and/or private property.

## 3.3 CONSTRUCTION

Construction of the Project would be implemented in three main phases over the course of six years, with an estimated completion date of 2025. The exact timing and completion of the Project's components would depend on fundraising efforts and other factors. Therefore, the Windward School would require flexibility to implement the Project. The following phasing schedule is conceptual in nature.

### *Phase 1 (2019–2020)*

The Project would begin with the repurposing of the existing apartment building for temporary office uses, and the construction of the temporary modular classroom buildings on the adjacent parking lot while the new buildings are being constructed. Phase 1 would then involve the renovation of the existing classroom, theater and administration building located north of the Sepulveda Channel, including the

remodel of the existing black box theater and partial removal of existing classroom spaces to allow for the construction of new rehearsal spaces and a technology classroom. This Phase would also include the removal and replacement of an existing pedestrian bridge over the Sepulveda Channel. Upon completion of the new classroom and administration buildings, the temporary classroom modular units would be removed.

Accordingly, construction activities associated with this phase of the Project include three main steps: (1) demolition/site clearing, (2) site preparation, and (3) building construction. This Phase is anticipated to occur over a period of 14 months, from summer 2019 through summer 2020.

### *Phase 2 (2021–2023)*

Phase 2 of the Project involves the demolition of existing approximately 13,600-square-foot apartment building, and the construction of the approximately 58,351-square-foot Arts and Innovation Center and pedestrian bridge connecting the new Center to the existing gymnasium on the Project Site.

Accordingly, construction activities associated with this phase of the Project include three main steps: (1) demolition/site preparation, (2) grading, and (3) building construction. This Phase is anticipated to occur over a period of 24 months, from summer 2021 through late spring 2023.

### *Phase 3 (2025)*

Phase 3 of the Project would involve the construction a student gathering plaza that spans the Sepulveda Channel and provides outdoor educational space and gathering areas for students, faculty, and staff.

Accordingly, construction activities associated with this phase of the Project would only include two main steps: (1) demolition/site preparation, (2) grading, and (3) building construction. This Phase is anticipated to occur over a period of 6 months, during 2025.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities. As stated in Section 41.40 of the Los Angeles Municipal Code (LAMC), the permissible hours of construction involving noise-generating equipment within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

## 3.1 Street Closures

Construction activities may necessitate temporary lane closures on streets adjacent to the Project Site on an intermittent basis for utility relocations/hook-ups, delivery of materials, and other construction

activities. However, site deliveries and the staging of all equipment and materials would be organized in the most efficient manner possible on site to mitigate any temporary impacts to the neighborhood and surrounding traffic. Construction equipment would be staged on site for the duration of construction activities. Traffic lane and right-of-way closures, if required, will be properly permitted by the City agencies and will conform to City standards.

Unless stated otherwise, all construction activities would be performed in accordance with all applicable State and federal laws and City codes and policies with respect to building construction and activities. As provided in Section 41.40 of the LAMC, the permissible hours of construction within the City are 7:00 AM to 9:00 PM Monday through Friday, and between 8:00 AM and 6:00 PM on any Saturday or national holiday. No construction activities are permitted on Sundays. The Project would comply with these restrictions.

## 3.2 Haul Routes

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be removed from the Project Site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility.

It is anticipated that the excavation and soil export would involve 18-wheel bottom-dump trucks with a 14-cubic yard hauling capacity. Phase 1 would result in the import and export of 1,000 cubic yards of dirt from the Project Site; Phase 2 would result in the import and export of approximately 4,000 cubic yards of dirt; and Phase 3 would result in the import and export of 500 cubic yards of dirt.

5,500 cubic yards of dirt would be exported from the site. Approximately 10 vendor truck trips would be required during building construction. and 500 hauling truck trips would be required during grading for Phase 2, the peak construction period of the Project.

All truck staging would occur either on site or at designated off-site locations and radioed into the site to be filled. The local haul route for the Project Site would either the I-405 South via Sawtelle Boulevard or the I-405 North via Sawtelle Boulevard to Venice Boulevard to Sepulveda Boulevard. The haul route specified above may be modified in compliance with City policies, provided Department of Transportation (DOT) and/or Street Services approves any such modification.

# 4.0 INITIAL STUDY CHECKLIST

**CITY OF LOS ANGELES**

**CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**INITIAL STUDY and CHECKLIST**

**(*CEQA Guidelines* Section 15063)**

<table>
<tr><td colspan="2">LEAD CITY AGENCY:<br>City of Los Angeles, Department of City Planning</td><td colspan="2">COUNCIL DISTRICT:<br>CD 11 – Mike Bonin</td><td>DATE:</td></tr>
<tr><td colspan="5">RESPONSIBLE AGENCIES:<br>Los Angeles County Flood Control District</td></tr>
<tr><td colspan="2">PROJECT TITLE:<br>Windward School Master Plan Project</td><td colspan="2">ENVIRONMENTAL CASE:<br>ENV-2018-4476-MND</td><td>CASE NOS: 2018-4475-ZV-ZAA-SPR</td></tr>
<tr><td colspan="2">PREVIOUS ACTIONS CASE NO.<br>ZA-98-0893-ZV-YV<br><br>ZA-98-0893-ZV-YV-PA4</td><td colspan="3">☐ DOES have significant changes from previous actions.<br>☒ DOES NOT have significant changes from previous actions</td></tr>
<tr><td colspan="5">PROJECT LOCATION: The Project is located at 11340-11350 Palms Boulevard, 3481-3485 Sawtelle Boulevard, and 11375 Westminster Avenue, in the City of Los Angeles, California 90066.</td></tr>
<tr><td colspan="5">PROJECT DESCRIPTION: See Section 3.0 of this Initial Study.</td></tr>
<tr><td colspan="5">ENVIRONMENTAL SETTING: See Section 2.0 of this Initial Study.</td></tr>
<tr><td colspan="3">COMMUNITY PLAN AREA: Palms-Mar Vista-Del Rey<br>STATUS:<br>☐ Preliminary ☒ Does Conform to Plan<br>☐ Proposed ☐ Does NOT Conform to Plan<br>☒ Adopted in 2001</td><td>AREA PLANNING COMMISSION:<br>West Los Angeles</td><td>CERTIFIED NEIGHBORHOOD COUNCIL:<br>Mar Vista</td></tr>
<tr><td>EXISTING ZONING:<br>R1V2, OS-1XL, R3-1</td><td>MAX DENSITY ZONING:<br>1.5:1 commercial FAR and 3.0:1 residential FAR</td><td colspan="3">LA River Adjacent:<br>No</td></tr>
<tr><td>GENERAL PLAN LAND USE:<br>Open Space<br>Residential Single Family<br>Residential Multiple Family</td><td>MAX. DENSITY PLAN:<br>Same as zoning</td><td colspan="3">PROPOSED PROJECT DENSITY:<br>2.99:1 FAR</td></tr>
</table>

**Determination (to be completed by 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.

| Signature | Title | Date |
|---|---|---|
| [signature] | City Planner | February 8, 2019 |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **EACH DETERMINATION IN THIS INITIAL STUDY CHECKLIST IS BASED UPON SECTION 4.0: ENVIRONMENTAL ANALYSIS. PLEASE REFER TO THE APPLICABLE SECTION THEREIN FOR A DETAILED DISCUSSION OF THE CHECKLIST DETERMINATIONS.** | | | | | |
| **1.** | **AESTHETICS** | | | | |
| ***Would the project:*** | | | | | |
| a. | Have a substantial adverse effect on a scenic vista? | ☐ | ☐ | ☒ | ☐ |
| b. | Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway? | ☐ | ☐ | ☒ | ☐ |
| c. | Substantially degrade the existing visual character or quality of the site and its surroundings? | ☐ | ☐ | ☒ | ☐ |
| d. | Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | ☐ | ☐ | ☒ | ☐ |
| **2.** | **AGRICULTURE AND FOREST RESOURCES** | | | | |
| ***Would the project:*** | | | | | |
| a. | Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | ☐ | ☐ | ☐ | ☒ |
| b. | Conflict with existing zoning for agricultural use, or a Williamson Act contract? | ☐ | ☐ | ☐ | ☒ |
| 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))? | ☐ | ☐ | ☐ | ☒ |
| d. | Result in the loss of forest land or conversion of forest land to non-forest use? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| **3.** | **AIR QUALITY** | | | | |
| ***Would the project:*** | | | | | |
| a. | Conflict with or obstruct implementation of the SCAQMD or congestion management plan? | ☐ | ☐ | ☒ | ☐ |
| b. | Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| c. | Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)? | ☐ | ☐ | ☒ | ☐ |
| d. | Expose sensitive receptors to substantial pollutant concentrations? | ☐ | ☐ | ☒ | ☐ |
| e. | Create objectionable odors affecting a substantial number of people? | ☐ | ☐ | ☒ | ☐ |
| **4.** | **BIOLOGICAL RESOURCES** | | | | |
| ***Would the project:*** | | | | | |
| a. | Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by The California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☒ | ☐ | ☐ |
| b. | Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the city or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service? | ☐ | ☐ | ☒ | ☐ |
| c. | Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| e. | Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| **5.** | **CULTURAL RESOURCES** | | | | |
| ***Would the project:*** | | | | | |
| a. | Cause a substantial adverse change in significance of a historical resource as defined in State CEQA Section 15064.5? | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| b. | Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA Section 15064.5? | ☐ | ☐ | ☒ | ☐ |
| c. | Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | ☐ | ☐ | ☒ | ☐ |
| d. | Disturb any human remains, including those interred outside of formal cemeteries? | ☐ | ☐ | ☒ | ☐ |
| **6.** | **GEOLOGY AND SOILS** | | | | |
| ***Would the project:*** | | | | | |
| Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving: | | | | | |
| a. | 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. | ☐ | ☐ | ☒ | ☐ |
| b. | Strong seismic ground shaking? | ☐ | ☐ | ☒ | ☐ |
| c. | Seismic-related ground failure, including liquefaction? | ☐ | ☐ | ☒ | ☐ |
| d. | Landslides? | ☐ | ☐ | ☐ | ☒ |
| e. | Result in substantial soil erosion or the loss of topsoil? | ☐ | ☐ | ☒ | ☐ |
| f. | Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions? | ☐ | ☐ | ☒ | ☐ |
| g. | Be located on expansive soil, as defined in Table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions? | ☐ | ☐ | ☒ | ☐ |
| h. | 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? | ☐ | ☐ | ☐ | ☒ |
| **7.** | **GREENHOUSE GAS EMISSIONS** | | | | |
| ***Would the project:*** | | | | | |
| a. | Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| b. | Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | ☐ | ☐ | ☒ | ☐ |
| **8.** | **HAZARDS AND HAZARDOUS MATERIALS** | | | | |
| ***Would the project:*** | | | | | |
| a. | Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| c. | Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | ☐ | ☐ | ☒ | ☐ |
| 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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment? | ☐ | ☐ | ☒ | ☐ |
| 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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| f. | For a project within the vicinity of a private airstrip, would the project exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area? | ☐ | ☐ | ☐ | ☒ |
| g. | Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | ☐ | ☐ | ☒ | ☐ |
| h. | Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | ☐ | ☐ | ☐ | ☒ |
| **9.** | **HYDROLOGY AND WATER QUALITY** | | | | |
| ***Would the project:*** | | | | | |
| a. | Violate any water quality standards or waste discharge requirements? | ☐ | ☐ | ☒ | ☐ |
| b. | Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| | in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)? | | | | |
| c. | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite? | ☐ | ☐ | ☒ | ☐ |
| d. | Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite? | ☐ | ☐ | ☒ | ☐ |
| e. | 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? | ☐ | ☐ | ☒ | ☐ |
| f. | Otherwise substantially degrade water quality? | ☐ | ☐ | ☒ | ☐ |
| g. | Place housing within a 100-year flood plain as mapped on federal flood hazard boundary or flood insurance rate map or other flood hazard delineation map? | ☐ | ☐ | ☐ | ☒ |
| h. | Place within a 100-year flood plain structures which would impede or redirect flood flows? | ☐ | ☐ | ☐ | ☒ |
| i. | Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? | ☐ | ☐ | ☒ | |
| j. | Inundation by seiche, tsunami, or mudflow? | ☐ | ☐ | ☐ | ☒ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **10.** | **LAND USE AND PLANNING** | | | | |
| ***Would the project:*** | | | | | |
| a. | Physically divide an established community? | ☐ | ☐ | ☐ | ☒ |
| b. | Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | ☐ | ☐ | ☒ | ☐ |
| c. | Conflict with any applicable habitat conservation plan or natural community conservation plan? | ☐ | ☐ | ☐ | ☒ |
| **11.** | **MINERAL RESOURCES** | | | | |
| ***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? | ☐ | ☐ | ☐ | ☒ |
| 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? | ☐ | ☐ | ☐ | ☒ |
| **12.** | **NOISE** | | | | |
| ***Would the project:*** | | | | | |
| a. | Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | ☐ | ☒ | ☐ | ☐ |
| b. | Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels? | ☐ | ☐ | ☒ | ☐ |
| c. | A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☐ | ☒ | ☐ |
| d. | A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? | ☐ | ☒ | ☐ | ☐ |
| 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 expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☒ | ☐ |
| f. | For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? | ☐ | ☐ | ☐ | ☒ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| **13. POPULATION AND HOUSING** | | | | | |
| ***Would the project:*** | | | | | |
| a. | Induce substantial 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)? | ☐ | ☐ | ☒ | ☐ |
| b. | Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☒ | ☐ |
| c. | Displace substantial numbers of people necessitating the construction of replacement housing elsewhere? | ☐ | ☐ | ☐ | ☒ |
| **14. PUBLIC SERVICES** | | | | | |
| ***Would the project:*** | | | | | |
| a. | 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: | | | | |
| | i. Fire protection? | ☐ | ☐ | ☒ | ☐ |
| | ii. Police protection? | ☐ | ☐ | ☒ | ☐ |
| | iii. Schools? | ☐ | ☐ | ☒ | ☐ |
| | iv. Parks? | ☐ | ☐ | ☒ | ☐ |
| | v. Other public facilities? | ☐ | ☐ | ☒ | ☐ |
| **15. RECREATION** | | | | | |
| ***Would the project:*** | | | | | |
| 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? | ☐ | ☐ | ☒ | ☐ |
| 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? | ☐ | ☐ | ☒ | ☐ |
| **16. TRANSPORTATION AND TRAFFIC** | | | | | |
| ***Would the project:*** | | | | | |
| a. | Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| | but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit? | | | | |
| b. | Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | ☐ | ☐ | ☒ | ☐ |
| c. | Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? | ☐ | ☐ | ☐ | ☒ |
| d. | Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | ☐ | ☐ | ☒ | ☐ |
| e. | Result in inadequate emergency access? | ☐ | ☐ | ☒ | ☐ |
| f. | Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | ☐ | ☐ | ☒ | ☐ |
| **17. TRIBAL CULTURAL RESOURCES** | | | | | |
| ***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) | ☐ | ☐ | ☒ | ☐ |
| 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. | ☐ | ☒ | ☐ | ☐ |
| **18. UTILITIES & SERVICE SYSTEMS** | | | | | |
| ***Would the project:*** | | | | | |
| a. | Exceed wastewater treatment requirements of the applicable regional water quality control board? | ☐ | ☐ | ☒ | ☐ |
| b. | Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |

| | | Potentially Significant Impact | Less than Significant with Project Mitigation | Less than Significant Impact | No Impact |
|---|---|---|---|---|---|
| c. | Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | ☐ | ☐ | ☒ | ☐ |
| d. | Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed? | ☐ | ☐ | ☒ | ☐ |
| e. | 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? | ☐ | ☐ | ☒ | ☐ |
| f. | Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? | ☐ | ☐ | ☒ | ☐ |
| g. | Comply with federal, state, and local statutes and regulations related to solid waste? | ☐ | ☐ | ☒ | ☐ |
| **19.** | **MANDATORY FINDINGS OF SIGNIFICANCE** | | | | |
| a. | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self---sustaining levels, threaten to eliminate a plant or animal community, 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? | ☐ | ☐ | ☒ | ☐ |
| b. | Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of an individual 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). | ☐ | ☐ | ☒ | ☐ |
| c. | Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ | ☐ | ☐ |

# 5.0 ENVIRONMENTAL ANALYSIS

This section contains an assessment of impacts associated with the issues and subject areas identified in the Initial Study Checklist. The thresholds of significance are based on the L.A. *CEQA Thresholds Guide*.

## 5.1 AESTHETICS

### Impact Analysis

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

**Less than Significant Impact.** A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest).

The Project Site is located along the I-405 and Sawtelle Boulevard with surrounding views generally defined by low-rise single- and multi-family residential uses and public open space. The Palms-Mar Vista-Del Rey Community Plan does not identify any scenic vistas near the Project Site. Further, the Project Site is not located within or along a designated scenic corridor. The Project Site is currently developed with the existing Windward School campus and existing 2-story apartment complex. The Project involves the implementation of a series of phased campus improvements, including the demolition and construction of new and existing facilities. The scale and aesthetic character of the proposed improvements and new facilities would be consistent with the design of the existing campus. The Project would replace the existing 2-story classroom and administration buildings within the northern portion of the Project Site with new 2-story classroom and administration buildings that would not exceed a height of approximately 33 feet. On the southern portion of the Project Site, the Project would replace the existing 2-story apartment building with the proposed the Arts and Innovation Center, which would not exceed a height of approximately 52 feet.

The Project would not result in a substantial change in the distribution of structures as seen from public vantage points around the Project Site, nor would it result in a substantial adverse effect on a scenic vista. The Project would be visually compatible with the urban form of the surrounding neighborhood. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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**. Based on the *L.A. CEQA Thresholds Guide,* a significant impact could occur if existing structures on the Project Site have been identified as a scenic resource. The Project Site is not bordered by or within the viewshed of a designated scenic highway. No historic buildings, rock outcroppings, or unique geologic features exist on the Project site. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

**Less than Significant Impact**. Based on the *L.A. CEQA Thresholds Guide,* a significant impact could occur if the Project were to introduce incompatible visual elements on the Project Site or visual elements that would be incompatible with the character of the area surrounding the Project Site.

#### *Building Heights and Massing*

With respect to building mass and height, land uses within the Project vicinity vary in use and height. Within the Palms-Mar Vista-Del Rey Community Plan area, commercial, office, parking, and residential land uses exist ranging in various heights. Buildings close to the Project Site are considered low- to medium- rise in height, ranging from 1 to 4 stories. The new school facilities proposed on the Project Site would range between 2 and 4 stories, for a maximum proposed height of approximately 52 feet in height. The proposed buildings would be taller than buildings immediately adjacent, however, it would be consistent with the overall visual character of surrounding uses and the Palms-Mar Vista-Del Rey Community Plan area. As such, impacts would be less than significant.

#### Views

At a maximum height of approximately 52 feet above grade, the proposed the Arts and Innovation Center may be visible from private viewpoints within commercial or residential buildings in the Palms-Mar Vista-Del Rey Community Plan area. Existing views toward the West Los Angeles skyline or the Santa Monica Mountains from these vantage points may be obstructed as a result of the Project. However, it should be noted that private views are not protected by any viewshed protection ordinance, and the alteration of private views would not constitute a significant impact. The visual impact of one building blocking another building is not considered a significant impact because the general characteristics of the urban setting would not be altered. The Project would be consistent with the general visual character of Palms-Mar Vista-Del Rey when viewed from a distance. As such, impacts would be less than significant.

### Shade and Shadow

Based on the *L.A. CEQA Thresholds Guide*, a shading impact would normally be considered significant if the proposed Project's structure cast shadows on shade sensitive uses for more than 3 hours each day between the hours of 9:00 AM and 3:00 PM during winter months, or for more than 4 hours each day between the hours of 9:00 AM and 5:00 PM during the summer months. Shade sensitive uses include routinely useable outdoor spaces associated with residential, recreational, or institutional land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. Within the project vicinity are several shade-sensitive land uses, including the Mar Vista Recreation Center to the north, and the outdoor balconies, courtyards, and pool areas associated with the residential buildings to the west and east. The useable outdoor spaces associated with the residential uses to the south would not be affected by any shade and shadow cast by the Project.

The Project would cast shadows to the northeast, north, and northwest. The proposed 2-story classroom and administration buildings within the northern portion of the Project Site along Palms Boulevard would not exceed 33 feet in height; and the proposed Arts and Innovation Center within the eastern portion of the Project Site along Sawtelle Boulevard would be a maximum height of 52 feet. As none of the proposed facilities would exceed a building height of 60 feet in height, the *L.A. CEQA Thresholds Guide's* screening criteria for significant impacts from light-blocking structures, no shadow-sensitive uses would be affected that are not already subjected to shadow from existing structures which currently range in similar building heights. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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.** Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project introduces new sources of light or glare on or from the Project Site that would be incompatible with the areas surrounding the Project Site, or which pose a safety hazard to motorists using adjacent streets or freeways. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the Project results in a significant nighttime illumination impact shall be made considering the change in ambient illumination levels as a result of Project sources and the extent to which Project lighting would spill off the Project Site and affect adjacent light-sensitive areas.

## Light

The Project Site currently generates low levels of artificial light and glare sources associated with the existing Windward School campus buildings and surface parking lots. Implementation of the Project would not introduce a substantial amount of new lighting and potential sources of glare on the Project Site. New sources of lighting would include lighting to illuminate the building entrances and the student gathering plaza provide adequate night visibility for students and faculty and to provide a measure of security. In accordance with current design practices, lighting would be designed with shielding features and directed downwards to reduce light-sourced impacts surrounding the project site, particularly to the surrounding residential uses and Mar Vista Recreation center.

In general, lighting would be typical of the existing structures found on the Project Site, as well within the surrounding area. As such, impacts would be less than significant.

## Glare

Potential reflective surfaces in the Project Site vicinity include automobiles, exterior building windows, and other glass and polished metal surfaces. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. However, the proposed building materials would consist of nonreflective, textured surfaces and nonreflective glazed glass on the building exterior to not create daytime glare that could affect nearby sensitive uses. As such, the introduced sources of glare would be compatible with existing uses surrounding the Project Site. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.2 AGRICULTURE AND FORESTRY RESOURCES

## Impact Analysis

### *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 within a developed and urbanized area within the City of Los Angeles. No farmland or agricultural activity exists on or near the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance pursuance to the State Farmland Mapping and Monitoring Program.[6] As such, the Project would not convert farmland to a non-agricultural use. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

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

**No Impact.** The Project Site is within the jurisdiction of the City of Los Angeles and is subject to the applicable land use and zoning requirements of the LAMC. The Project Site is designated by the Palms-Mar Vista-Del Rey Community Plan as Open Space, Residential Single Family, and Residential Multiple Family. The northern portion of the Project Site is zoned R1V2 (One-Family Zone) and the southern portion of the Project Site, across from the Sepulveda Channel, is zoned OS-1XL (Open Space Zone) and [Q]R3-1 (Multiple Dwelling Zone). As such, the Project Site is not zoned for agricultural production, and there is no farmland at the Project Site. In addition, no Williamson Act Contracts are in effect for the Project Site.[7] No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

6 California Department of Conservation, Division of Land Resource Protection, "Los Angeles County Important Farmland 2016," map (July 2017), ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.

7 California Department of Conservation, Division of Land Resource Protection, "Los Angeles County Williamson Act FY 2015/2016" (2016), ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf.

***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.** The Project Site has mixed land use designations of Open Space, Residential Single Family, and Residential Multiple Family which are zoned for OS-1XL (Open Space Zone), R1V2 (One-Family Zone), [Q]R3-1 (Multiple Dwelling Zone) uses, respectively. As such, the Project Site is not zoned as forest land or timberland, and there is no timberland production at the Project Site. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

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

**No Impact.** The Project Site is currently developed with the existing Windward School campus and apartment building. No forested lands or natural vegetation exists on or near the Project Site. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

***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?***

**No Impact.** Neither the Project Site, nor nearby properties, are currently utilized for agricultural or forestry uses. The Project Site is not classified in any "Farmland" category designated by the State of California. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.3 AIR QUALITY

## Impact Analysis

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

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact could occur if the Project is not consistent with the applicable Air Quality Management Plan (AQMP) or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of that plan. In the case of projects proposed within the City of Los Angeles or elsewhere in the South Coast Air Basin (Basin), the applicable plan is the AQMP, which is prepared by the South Coast Air Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments, and cooperates actively with all State and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

To fulfill its commitments as a metropolitan planning organization (MPO) under the Sustainable Communities and Climate Protection Act, SCAG adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The Growth Management chapter of the RTP/SCS forms the basis of land use and transportation controls of the AQMP. Projects that are consistent with the projections of population forecasts are considered consistent with the AQMP. The Project would involve the partial demolition of an existing classroom/administration building and an apartment building. The existing pedestrian bridge that currently spans the Sepulveda Channel will be removed and replaced with a new pedestrian bridge. The Project also includes the renovation and expansion of one existing classroom, office, and theater building, including renovation of an existing black box theatre, and the construction of the Arts & Innovation Center, along with a pedestrian bridge connecting the new Center to the existing gym, and a student gathering center. The Project would not conflict with the control strategies intended to reduce emissions from construction equipment. Because the Project would not result in any significant long-term changes in population or employment growth, it would be considered consistent with the growth projections developed by SCAG. Furthermore, the Project would comply with all applicable SCAQMD rules and regulations as discussed as below. Based on the factors presented, the Project would not conflict with or obstruct implementation of the AQMP, and impacts would be less than significant.

***Mitigation Measures***: No mitigation measures are necessary.

### *b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a project could have a significant impact if project-related emissions were to exceed federal, State, or regional standards or thresholds, or if project-related emissions were to substantially contribute to an existing or projected air quality violation. The Project would contribute to regional and localized air pollutant emissions during construction and Project operation.

The United Stated Environmental Protection Agency (USEPA) is responsible for the implementation of portions of the Clean Air Act (CAA) of 1970,[8] which regulates certain stationary and mobile sources of air emissions and other requirements. Charged with handling global, international, national, and interstate air pollution issues and policies, the USEPA sets national vehicle and stationary source emission standards; oversees the approval of all State Implementation Plans;[9] provides research and guidance for air pollution programs; and sets National Ambient Air Quality Standards (NAAQS).[10] NAAQS for the seven common air pollutants, Ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), particulate matter (PM10), fine particulate matter (PM2.5), and lead (Pb), are identified in the CAA.

## *Construction Emissions*

As described in **Section 3.0: Project Description,** the proposed development on the Project Site includes the renovation and demolition of existing classroom, theater, administration, and apartment buildings to construct new expansion and updated buildings including a new Arts and Innovation Center. Construction would occur over three phases.

As described in **Table 3.0-1**, Phase 1 includes demolition of the existing classroom, black box theater and administration building (12,964 square feet) for construction of the new classroom, theater and administration building (25,192 square feet). Construction activities associated with this phase of the Project include three main steps: (1) demolition/site clearing, (2) site preparation, and (3) building construction. Construction of Phase 1 is anticipated to occur over a period of 14 months, from summer 2019 through summer 2020.

Phase 2 includes demolition of the existing apartment building (13,596 square feet) to allow for construction of the new Arts and Innovation Center (58,351 square feet), and a pedestrian bridge

8 US Environmental Protection Agency, "Clean Air Act Text," https://www.epa.gov/clean-air-act-overview/clean-air-act-text.

9 A State Implementation Plan is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain National Ambient Air Quality Standards.

10 The NAAQS were set to protect public health, including that of sensitive individuals; for this reason, the standards continue to change as more medical research becomes available regarding the health effects of the criteria pollutants. The primary NAAQS define the air quality considered necessary, with an adequate margin of safety, to protect the public health.

connecting the new Center to the existing gym. Construction activities associated with this phase of the Project include three main steps: (1) demolition/site preparation, (2) grading, and (3) building construction. Construction of Phase 2 is anticipated to occur over a period of 24 months, from summer 2021 through late spring 2023.

Phase 3 includes construction of a student gathering plaza (4,065 square feet) and would not involve the addition of any building floor area on the Project site. This Phase is anticipated to occur over a period of 6 months, during 2025. Construction activities associated with this phase of the Project would include three main steps: (1) site preparation, (2) grading, and (3) building construction.

Construction activities would create emissions of dusts, fumes, equipment exhaust, and other air contaminants. Construction activities during the demolition/grading/excavation/site preparation phases would primarily generate particle pollution. Particles less than 10 micrometers in diameter (PM10) and particles less than 2.5 micrometers in diameter (PM2.5) would be the primary sources of particle pollution. Mobile sources (such as diesel-fueled equipment on site and traveling to and from the Project Site) would primarily generate nitrogen oxide (NOx) emissions. The application of architectural coatings, such as paint, during the building construction phase would primarily result in the release of volatile organic compound (VOC) emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time.

The analysis of daily construction emissions for all three phases was prepared utilizing the California Emissions Estimator Model (CalEEMod) recommended by the SCAQMD. **Table 5.3-1: Maximum Construction Emissions**, identifies daily emissions that are estimated to occur on peak construction days for each phase of construction. As shown in **Table 5.3-1,** construction-related daily emissions associated with each phase of construction would not exceed any regional SCAQMD significant threshold for criteria pollutants.

As the Project lies within the jurisdiction of the SCAQMD, compliance with SCAQMD rules and guidelines is required. Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust), Rule 1113 (Architectural Coatings), and Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Rule 403 requires the use of stringent best available control measures to minimize PM10 emissions during grading and construction activities. Control requirements for Rule 403 include but are not limited to applying water in sufficient quantities (at least three times per day) to prevent the generation of visible dust plumes; applying soil binders to uncovered areas; reestablishing ground cover as quickly as possible; utilizing a wheel-washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site; and maintaining effective cover over exposed areas.

Rule 1113 requires reductions in the VOC content of coatings, with a substantial reduction in the VOC content limit for flat coatings. Rule 1113 provides specifications on painting practices as well as regulating the VOC content within paint. These specifications include container modifications for pouring, brushing, or other means with the addition of drums, buckets, or other applications. In addition, any container of VOC-containing materials used for thinning and cleanup must be closed when not in use.

Compliance with SCAQMD Rule 1403 requires that the owner or operator of any demolition or renovation activity to have an asbestos survey performed prior to demolition and provide notification to the SCAQMD prior to commencing demolition activities.

**Table 5.3-1**
**Maximum Construction Emissions**

| | VOC | NOx | CO | SOx | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| **Source** | **pounds/day** | | | | | |
| Phase 1 | 2 | 13 | 9 | <1 | 1 | 1 |
| SCAQMD Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 2 | 4 | 16 | 10 | <1 | 1 | 1 |
| SCAQMD Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 3 | 1 | 11 | 8 | <1 | 1 | 1 |
| SCAQMD Threshold | 75 | 100 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Note:*
*Detailed emissions calculations are provided in **Appendix A: (Summer/Winter),** Section 2.1 Overall Construction.*
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*

## *Operational Emissions*

As described in **Section 3.0: Project Description,** the proposed development on the Project Site includes the renovation and demolition of existing classroom, theater, administration, and an apartment building to construct new expansion and updated buildings including a new Arts and Innovation Center. As such, new air pollutants would be introduced due to Project operation.

As described in **Table 3.0-1**, Phase 1 includes demolition of the existing classroom, black box theater and administration building for construction of the new classroom, theater and administration building. Operational emissions associated with this phase of the Project include mobile, area, energy, waste, and water emissions based on the amount of development. This includes various energy uses from operation

of the classroom, theater, and administration building and stationary sources, such as the classrooms or HVAC units.

Phase 2 includes demolition of the existing apartment building to allow for construction of the new Arts and Innovation Center. Operational emissions associated with this phase of the Project include energy uses from the new building and vehicle trips to and from the Arts and Innovation Center.

Phase 3 includes construction of a student gathering plaza (would not involve the addition of any building floor area on the Project site). Operational emissions associated with this phase would be limited as no additional buildings are added as part of this phase of the Project.

Therefore, operation of new school facilities on the existing campus would result in the generation of vehicle trips and new localized air pollutant emissions from nonmobile sources (i.e., area sources and energy use). Overall, however, it is not anticipated that operation of the Project would generate long-term air pollutant emissions that would exceed the SCAQMD regional operation significance thresholds. As schools are typically growth accommodating land uses built to serve the local community, it is not anticipated that the reconstructed campus would generate a substantial amount of nontransportation sources of emissions. The results are presented in **Table 5.3-2: Maximum Operational Emissions** and are compared to the SCAQMD-established operational significance threshold.

**Table 5.3-2**
**Maximum Operational Emissions**

| Source | VOC | NOx | CO | SOx | PM10 | PM 2.5 |
|---|---|---|---|---|---|---|
| | pounds/day | | | | | |
| Existing | 3 | 4 | 11 | <1 | 2 | 1 |
| SCAQMD Mass Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 1[a] | 4 | 4 | 13 | <1 | 2 | 1 |
| *Existing* | *(3)* | *(4)* | *(11)* | *(<1)* | *(2)* | *(1)* |
| Phase I Net Maximum | 1 | <1 | 2 | <1 | <1 | <1 |
| SCAQMD Mass Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 2[b] | 5 | 6 | 18 | <1 | 4 | 1 |
| *Phase 1 plus Existing* | *(4)* | *(4)* | *(13)* | *(<1)* | *(2)* | *(1)* |
| Phase 2 Net Maximum | 1 | 2 | 5 | <1 | 2 | <1 |
| SCAQMD Mass Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 3[c] | 5 | 6 | 18 | <1 | 4 | 1 |

| Source | VOC | NOx | CO | SOx | PM10 | PM 2.5 |
|---|---|---|---|---|---|---|
| | pounds/day | | | | | |
| *Phase 2 plus Phase 1 plus Existing* | *(5)* | *(6)* | *(18)* | *(<1)* | *(4)* | *(1)* |
| Phase 3 Net Maximum | <1 | <1 | <1 | <1 | <1 | <1 |
| SCAQMD Mass Daily Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

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*Detailed emissions calculations are provided in **Appendix A (Summer/Winter),** Section 2.2 Overall Operation.*
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
[a] *This includes emissions from Phase 1 plus existing operation.*
[b] *This includes emissions from Phase 1 plus Phase 2 and existing operation.*
[c] *This includes emissions from Phase 1 plus Phase 2 plus Phase 3 and existing operation.*

As shown in **Table 5.3-2**, the quantity of operational emissions associated with the Project would not exceed the regional thresholds of significance set by the SCAQMD. Furthermore, the Project would also be designed to Los Angeles Department of Building and Safety (LADBS) and Leadership in Energy and Environmental Design (LEED) Gold standards, under the existing campus LEED certification. LEED incorporates new sustainable building design standards and features such as LED site lighting, building management system for HVAC units, and low-flow water fixtures to reduce energy consumption and reduce operational emissions. As such, impacts would be less than significant.

## *Overlapping Emissions*

SCAQMD recommends that for projects that have phased scenarios to sum the operational emissions of a previous scenario to the construction of the following phase. The estimated overlapping emissions are based on the development of the Project are presented in **Table 5.3-3: Maximum Overlapping Emissions** and are compared to the SCAQMD established operational significant threshold. As shown in **Table 5.3-3,** air quality impacts during operation of the Project would remain less than significant for each of the criteria pollutants. As such impacts from overlapping phased emissions would less than significant.

**Table 5.3-3**
**Maximum Overlapping Emissions**

| | Pollutant (pounds/day) | | | | | |
|---|---|---|---|---|---|---|
| **Source** | **VOC** | **NOx** | **CO** | **SOx** | **PM10** | **PM2.5** |
| Existing Operation | 3 | 4 | 11 | <1 | 2 | 1 |
| Phase 1 Construction | 2 | 13 | 9 | <1 | 1 | 1 |
| Overlapping Maximum | 5 | 17 | 20 | <1 | 3 | 2 |
| SCAQMD threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 1 Operation | 1 | <1 | 2 | <1 | <1 | <1 |
| Phase 2 Construction | 4 | 16 | 10 | <1 | 1 | 1 |
| Overlapping Maximum | 5 | 16 | 12 | <1 | 1 | 1 |
| SCAQMD threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |
| Phase 2 Operation | 1 | 2 | 5 | <1 | 2 | <1 |
| Phase 3 Construction | 1 | 11 | 8 | <1 | 1 | 1 |
| Overlapping Maximum | 2 | 13 | 13 | <1 | 3 | 1 |
| SCAQMD threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

*Source: Refer to the data sheets in **Appendix A (Summer/Winter**), Section 2.1 Overall Construction and Section 2.2 Overall Operation.*
*Abbreviations: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; VOC = volatile organic compound; SCAQMD = South Coast Air Quality Management District; SOX = sulfur oxide.*

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?*

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the project would add a considerable cumulative contribution to federal or State nonattainment pollutants. Under the federal standards, the Basin is currently designated as nonattainment for the ozone, lead, and PM2.5 thresholds. Under the State standards the Basin is currently designated as nonattainment for the ozone, PM10, and PM2.5 thresholds. As such, related projects plus the Project could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With respect to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides

methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

As shown above in **Table 5.3-1** and **Table 5.3-2**, the Project would not generate construction or operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. The Project would not generate a cumulatively considerable increase in emissions of the pollutants for which the Basin is in nonattainment. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *d. Would the project expose sensitive receptors to substantial pollutant concentrations?*

**Less than Significant Impact.** Project construction activities and operations, as described previously, may increase air emissions above current levels. Also, concentrations of pollutants may have the potential to impact nearby sensitive receptors. Sensitive receptors are defined as schools, residential homes, hospitals, resident care facilities, daycare centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The nearest sensitive receptors are the single- and multifamily residential uses along Sawtelle Boulevard and single-family residential uses along Westminster Avenue and Butler Avenue. In addition to these off-site receptors, the remaining school facilities on the Project Site would also be considered sensitive receptors.

The localized effects from the on-site portion of the missions are evaluated at nearby sensitive receptor location potentially impacted by the Project according to the SCAQMD Final Localized Significance Threshold (LST) Methodology,[11] which relies on on-site mass emission rate screening tables and project-specific dispersion modeling, where appropriate. The LST are only applicable to NOx, CO, PM10, and PM2.5. For NOx, and CO, significance thresholds are based on the ambient air quality standards. For PM10 and PM2.5, the thresholds are based on requirements in SCAQMD Rule 403 (Fugitive Dust) and Rule 1303 (New Source Review Requirements). The SCAQMD provides mass emission rate screening tables are used for projects which are five acres or less. Projects which are larger than five acres, detailed dispersion modeling is recommended to assess air quality impacts.

11 Southern California Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed September 2018.

The screening criteria provided in the Localized Significance Threshold Methodology were used to determine localized construction emissions thresholds for the Project. SCAQMD has divided its jurisdictional territory of the Basin into 38 Source Receptor Areas (SRAs). The Project site is located in the Northwest Coastal Los Angeles County SRA 2.[12] As each of the construction phases would occur on a lot of no more than one acre; therefore, the screening tables are used to evaluate localized emissions. Although the sensitive receptors for the rest of the remaining school facilities are within a 25-meter (82 feet) distance, SCAQMD states that projects within 82 feet should use LST's located at 25 meters.[13]

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The LST analysis for the Project has been prepared utilizing CalEEMod and threshold levels as recommended by the SCAQMD. The LST used in **Table 5.3-4: Maximum Construction LST Emissions** and **Table 5.3-5: Maximum Operational LST Emissions**, illustrates the net difference between the emissions from current uses at the Project Site and the peak daily emissions that would be generated within the Project Site during construction activities and operation for each phase. No other significant emissions would occur and, therefore, localized air quality impacts from construction activities and operation to the off-site sensitive receptors would be less than the less than significant impacts to the other school facilities.

**Table 5.3-4**
**Maximum Construction LST Emissions[1]**

| Source | NOx | CO | PM10 | PM2.5 |
|---|---|---|---|---|
| Phase 1 Maximum Emissions | 10 | 8 | 1 | 1 |
| Phase 2 Maximum Emissions | 10 | 8 | 1 | 1 |
| Phase 3 Maximum Emissions | 10 | 8 | 1 | 1 |
| LST threshold | 103 | 562 | 4 | 3 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |

*Detailed emissions calculations are provided in **Appendix A: (Summer/Winter),** Section 3.0 Construction Detail.*
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
*The operational emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.*
*CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.*
1 LST for a 1-acre site with sensitive receptors within 25 meters.

12 SCAQMD, Map of Monitoring Areas, accessed November 2017, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

13 Southern California Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008. http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds, accessed September 2018

**Table 5.3-5**
**Maximum Operation LST Emissions[1]**

| Source | NOx | CO | PM10 | PM2.5 |
|---|---|---|---|---|
| Existing Area/energy emissions | 1 | 2 | <1 | <1 |
| Phase 1[a] Area/energy emissions | 1 | 2 | <1 | <1 |
| Phase 1 Net Area/energy emissions | <1 | <1 | <1 | <1 |
| LST threshold | 103 | 562 | 1 | 1 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |
| Phase 2[b] Area/energy emissions | 1 | 2 | <1 | <1 |
| Phase 2 Net Area/energy emissions | <1 | <1 | <1 | <1 |
| LST threshold | 103 | 562 | 1 | 1 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |
| Phase 3[c] Area/energy emissions | 1 | 2 | <1 | <1 |
| Phase 3 Area/energy emissions | <1 | <1 | <1 | <1 |
| Total Phase change Area/energy emissions | <1 | <1 | <1 | <1 |
| LST threshold | 103 | 562 | 1 | 1 |
| ***Threshold Exceeded?*** | **No** | **No** | **No** | **No** |

*Detailed emissions calculations are provided in **Appendix A: (Summer/Winter),** Section 2.2 Overall Operation.*
*Totals in table may not appear to add exactly due to rounding in the computer model calculations.*
*The operational emissions of the Project represent the net difference between the existing operational uses that would be removed and the Project operational emissions.*
*CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.*
*[a] This includes emissions from Phase 1 plus existing operation.*
*[b] This includes emissions from Phase 1 plus Phase 2 and existing operation.*
*[c] This includes emissions from Phase 1 plus Phase 2 plus Phase 3 and existing operation.*
1 LST for a 1-acre site with sensitive receptors within 25 meters.

## Carbon Monoxide Hot Spot Analysis

It should be noted that LST methodology and associated mass rates are not designed to evaluate localized impacts from mobile sources traveling along the roadways. With regard to localized emissions from motor vehicle travel, traffic-congested roadways and intersections have the potential to generate localized high levels of carbon monoxide (CO). The SCAQMD suggests conducting a CO hot spot analysis for any intersection where a project would worsen the Level of Service (LOS) to any level below C, and for any intersection operating at LOS D or worse where the project would increase the volume-to-capacity (V/C) ratio by 2 percent or more.[14]

As shown in **Section 5.15: Transportation and Traffic**, each studied intersection would not worsen the LOS of any intersection below C, nor increase the V/C ratio by two percent of more for an intersection

14 SCAQMD, *CEQA Air Quality Handbook* (April 1993).

rated D or worse. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California 1-hour or 8-hour CO standards of 20 parts per million (ppm) or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard at any local intersection.

## Toxic Air Contaminants (TAC)

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC).

Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive receptors. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. Sensitive receptors are located adjacent to the Project Site to the south. Localized diesel particulate matter emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds as presented in **Table 5.3-5** above.

Hazardous materials can include petroleum, natural gas, synthetic gas, acutely toxic chemicals, and other toxic chemicals that are used in agriculture, commercial, and industrial uses; businesses; hospitals; and households. Therefore, the Project is not anticipated to use hazardous materials in appreciable quantities. Hazardous substances currently are regulated under the California Accidental Release Prevention (CalARP) Program. The CalARP Program satisfies the requirements of the Federal Risk Management Plan Program and contains additional State requirements. The CalARP Program applies to regulated substances in excess of specific quantity thresholds. The majority of the substances have thresholds in the range of 100 to 10,000 pounds. However, typical use of these products would not result in quantities at any one location that exceed the thresholds. Moreover, significant amounts of hazardous substances would typically be expected at industrial, manufacturing, and complex water or wastewater treatment land uses and not school uses. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance. Therefore, operational impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *e. Create objectionable odors affecting a substantial number of people?*

**Less than Significant Impact.** A significant impact could occur if objectionable odors are generated that would adversely impact sensitive receptors. Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as in sewage treatment facilities and landfills. As the Project involves no

elements related to these types of activities, no odors from these types of uses are anticipated. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. In addition, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts during the Project's long-term operations phase.

During the construction phase, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings such as paint and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable.

According to the SCAQMD *CEQA Air Quality Handbook,* land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting refineries, landfills, dairies, and fiberglass molding.[15] The proposed Project would not include any of these odor-producing uses. Odors associated with Project operation would be limited to on-site waste generation and disposal. All trash receptacles would be covered and properly maintained in accordance with City requirements to minimize odors. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

15 SCAQMD, *Air Quality Handbook*, accessed September 2018, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

# 5.4 BIOLOGICAL RESOURCES

## Impact Analysis

***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 Game or U.S. Fish and Wildlife Service?***

**Less than Significant Impact with Project Mitigation.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would result in (a) the loss of individuals, or the reduction of existing habitat of a State- or federal-listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern; (b) the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; or (c) interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise or light) to a degree that may diminish the chances for long-term survival of a sensitive species.

The Project Site is currently developed with the existing Windward School campus and apartment building. The Project Site does not contain any critical habitat or support 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 (CDFW) or US Fish and Wildlife Service (USFWS) as indicated on the California Natural Diversity Database (CNDDB).[16] However, numerous trees exist on the Project Site. Of these trees, 38 are slotted for removal. These trees are located within the northern portion of the Project Site to accommodate the proposed classroom and administration buildings, as well as the removal and replacement of the pedestrian bridge, and those adjacent to the existing apartment building, near Sawtelle Blvd. These trees may provide shelter and habitat for nesting birds. Nesting birds are protected under the federal Migratory Bird Treaty Act (MBTA)[17] and the California Department of Fish and Wildlife Code,[18] and the removal of trees could impact bird nests. As such, impacts would be potentially significant.

***Mitigation Measures:*** With the incorporation of the mitigation measure described below, impacts would be reduced to a less than significant level.

16 California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB), "Maps and Data," accessed August 2018, https://www.wildlife.ca.gov/Data/CNDDB.

17 United States Code, tit. 33, sec. 703 et seq.; see also Code of Federal Regulations, tit. 50, pt. 10.

18 California Department of Fish and Wildlife Code, sec. 3503.

**MM BIO-1:** Habitat Modification (Nesting Native Birds, Non-Hillside or Urban Areas)

Project activities (including disturbances to native and nonnative vegetation, structures, and substrates) should take place outside of the breeding season for birds, which generally runs from March 1 to August 31 (and as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code, Section 86).

If Project activities cannot feasibly avoid the breeding season, beginning 30 days prior to the disturbance of suitable nesting habitat, the Project Applicant shall:

- Arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the Project Site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis, with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
- If a protected native bird is found, the Project Applicant shall delay all clearance/ construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
- Alternatively, the qualified biologist could continue the surveys to locate any nests. If an active nest is located, clearing and construction (within 300 feet of the nest or as determined by a qualified biological monitor) shall be postponed until the nest is vacated and juveniles have fledged, and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The Project Applicant shall record the results of the recommended protective measures described previously to document compliance with applicable State and federal laws pertaining to the protection of native birds. Such record shall be submitted and received into the case file for the associated discretionary action permitting the Project.

***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 Game or U.S. Fish and Wildlife Service?***

**Less than Significant Impact.** The Project Site is within a developed and urbanized area within the City of Los Angeles. The Site is currently occupied by the existing Windward School campus and apartment building. While there are no native habitats or sensitive natural communities near the Project Site, the Los Angeles County Flood Control District Sepulveda Channel, which bisects the Project Site, is identified as a riverine.[19] However, the Sepulveda Channel is highly modified as it is lined with impervious surfaces. The Project would not encroach any existing easements associated with the Sepulveda Channel. In addition, the Project would not result in a significant increase in site runoff. Runoff from the Project Site currently is, and would continue to be, collected on the site and directed toward existing storm drains in the Project vicinity that have adequate capacity. In addition, the Project would be required to implement BMPs in compliance with all federal, State, and Local regulations governing stormwater discharge to reduce the impacts of the Project on surrounding water quality. Thus, the Project would not 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 Game or U.S. Fish and Wildlife Service. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would result in the alteration of an existing wetland habitat. The Project Site is not in proximity to nor does it contain wetland habitat or a blue-line stream that is subject to jurisdiction of the US Army Corps of Engineers or the CDFW. Implementation of the Project would not have substantial adverse effect on federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA) through direct removal, filling, hydrological interruption, or other means. As previously discussed, the Project would be required to implement BMPs in compliance with all federal, State, and Local regulations governing stormwater discharge to reduce the impacts of the

19 United States Fish and Wildlife Service (USFWS), National Wetlands Inventory V2, https://www.fws.gov/wetlands/data/mapper.HTML. Accessed September 2018.

Project on surrounding water quality, including the Sepulveda Channel. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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?*

**No Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on biological resources if it would interfere with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species. The Project Site is in a developed and urbanized area of the City of Los Angeles. Due to the urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites in the Project vicinity. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

### *e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

**Less than Significant.** Based on the criteria established in the *L.A. CEQA Thresholds Guide,* a project-related, significant adverse effect could occur if the Project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the City of Los Angeles Protected Tree Ordinance[20] or the City's adopted street tree policies. As provided in **Appendix B** of this Initial Study, numerous trees are located throughout the Project Site. Further, 68 private property trees and two City of Los Angeles rights-of-way trees were inventoried for the Project.[21] None of the private property species are considered protected by the ordinance. Further, none of the inventoried trees are California native specimens. A private property weeping fig tree has experienced extensive root loss due to construction of adjacent planters and should be removed regardless of construction. Thirty-seven other private property trees are proposed to be removed and 30 trees retained and incorporated into the project design. The two City rights of-way trees along Sawtelle Blvd will be preserved and protected during construction. The 38 private property trees proposed for removal are located along Palms Blvd, and along the perimeter of Sawtelle Channel. Seven additional trees slotted for removal are located adjacent to the existing apartment building, near Sawtelle Blvd.

The Proposed Project would comply with applicable regulatory compliance measures regarding non-protected tree removal and the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13)

20 City of Los Angeles Department of City Planning, Los Angeles Tree Ordinance (No. 177404), LAMC, sec. 12.21.

21 City of Los Angeles, Non-Protected Tree Report, Windward School, Cy Carlberg, Carlberg Associates, October 2018.

to ensure that the removal of the 38 non-protected trees on site would result in a less than significant impact.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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.** A significant impact could occur if the Project would be inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.5 CULTURAL RESOURCES

## Impact Analysis

### *a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project would disturb historic resources that presently exist within the Project Site. 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 (California Register); (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. The California Register automatically includes all properties listed in the National Register of Historic Places (National Register) and those formally determined to be eligible for listing in the National Register.

The Project Site is currently developed with the existing Windward School campus and apartment building. The existing structures are not designated for listing on the National Register of Historic Places, California Register of Historic Places, or the Los Angeles Historic Cultural Monument list. None of the existing structures have been identified as culturally significant through the SurveyLA, a comprehensive program by the City of Los Angeles Office of Historic Resources to identify significant historic resources.[22] The nearest historic resources or potentially historic resources are located at 11406 W. Victoria Avenue, located approximately 0.33 miles south of the Project Site, and the Mar Vista School, located approximately 0.36 miles west of the Project Site, which are designated as Los Angeles Historic-Cultural Monuments.[23]

Section 15064.5(b)(2) of the State CEQA Guidelines states that a Project would cause a substantial adverse change in the significance of a historic resource if it:

22 SurveyLA, Lo*s Angeles Historic Resources Survey,* https://preservation.lacity.org/survey, accessed September 2018.

23 HistoricPlacesLA, *Los Angeles Historic Resources Inventory*, http://www.historicplacesla.org/search, accessed September 2018.

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Construction and operation of the Project would not alter any of the physical characteristics of the nearby historic resources. Additionally, construction and operation of the Project would not alter the historic context of these buildings. The Project would be compatible in mass, size, and scale with the development pattern of the surrounding areas and would not adversely alter the design, character or feeling associated with any nearby historic resources. Therefore, impacts would be less than significant.

***Mitigation Measures*:** No mitigation measures are necessary.

### *b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

**Less than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if grading or excavation activities associated with the Project would disturb unique archaeological resources that could exist within the Project Site. The Project Site is located within an urbanized area that has been subject to grading and development in the past. There are no known archaeological sites or archaeological survey areas on or adjacent to the Project Site. As such, the likelihood of unearthing unique archeological resources is considered low. Per California Public Resources Code Section 21083.2(f), a lead agency may make provisions for archeological sites accidently discovered during construction. As a condition of approval, the City of Los Angeles requires that if archeological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated. With compliance, any potential archeological impacts of the Project would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

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

**Less than Significant Impact.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if grading or excavation activities associated with the Project were to disturb unique paleontological resources or geologic features that presently exist within the Project Site. The Project Site has been previously graded and is currently improved with an existing educational and residential buildings and related surface parking. The Project Site and immediate surrounding areas do not contain any known vertebrate paleontological resources. As such, the likelihood of unearthing unique paleontological resources is considered low. As a condition of approval, the City of Los Angeles requires that if paleontological artifacts are unearthed, construction activity cease while the significance of the artifacts are evaluated in compliance with California Public Resources Code Section 21083.2. With compliance, any potential paleontological impacts of the Project would be less than significant.

***Mitigation Measures*:** No mitigation measures are necessary.

### *d. Would the project disturb any human remains, including those interred outside of formal cemeteries?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant adverse effect could occur if grading or excavation activities would disturb previously interred human remains. The Project Site is located in an urbanized area and has been subject to grading and development in the past. No known burial sites are located on or adjacent to the Project Site. Furthermore, compliance with existing regulations, including State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98, would be required which specify the protocol if human remains are discovered during excavation, grading, or construction activities. If human remains are encountered State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If the County Coroner concludes that the remains are of Native American descent, the Native American Heritage Commission must be notified within 24 hours, and NAHC guidelines would be adhered to in the treatment and disposition of the remains. With regulatory compliance, any potential impacts of the Project would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.6 GEOLOGY AND SOILS

## Impact Analysis

***Would the project exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to potential substantial adverse effects, including the risk of loss, injury, or death involving:***

***a. 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.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project were located within a State-designated Alquist-Priolo Zone or other designated fault zone. According to the City's General Plan, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.[24] Additionally, the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, nor do any known active faults cross the Project Site.[25] The potential risk for surface fault rupture through the Project Site is considered low. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***b. Strong seismic ground shaking?***

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a project were to represent an increased risk to public safety or destruction of property by exposing people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with other locations in Southern California.

As previously discussed, the Project Site is not located within a seismic hazard zone for liquefaction, landsliding, or faulting. The nearest potentially active faults are the Newport-Inglewood Fault and the Santa Monica Fault, which are approximately 2.5 miles southeast and 3.0 miles north of the Project Site,

24 *City of Los Angeles General Plan,* "Safety Element" (1996), Exhibit A, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas in the City of Los Angeles.

25 Department of Conservation, "Regulatory Maps: Beverly Hills Quadrangle," http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.

respectively.[26] The Project would conform to all applicable provisions of the California Building Code seismic standards with respect to new construction, as approved by the Department of Building and Safety. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property, or infrastructure to seismically induced ground-shaking hazards that are greater than the average risk associated with locations in the Southern California region. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Seismic-related ground failure, including liquefaction?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact could occur if a Project Site were located within a liquefaction zone. As stated in the City's General Plan, Safety Element, and as noted in the City's parcel information report, the Project Site is not located within an area identified as having a potential for liquefaction.[27] However, the Project would be required to comply with the Uniform Building Code,[28] which requires the submittal of a geotechnical report prepared by a registered civil engineer or certified engineering geologist to the City's Department of Building and Safety. The review and approval of this geotechnical report must be completed prior to the issuance or grading or building permits. With adherence to this regulatory requirement to minimize hazards from liquefaction and other seismically-related ground failures, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *d. Landslides?*

**No Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant geologic hazard impact if it were to cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. A project-related, significant adverse effect could occur if the project were located in a hillside area with soil conditions that would suggest a high potential for sliding.

26 City of Los Angeles Department of City Planning, Parcel Profile Reports, *Zoning Information and Map Access System (ZIMAS),* database, http://www.zimas.lac.ity.org.

27 City of Los Angeles*, Zoning Information Map Access System (ZIMAS),* accessed September 2018, http://zimas.lacity.org/.

28 Uniform Building Code, Chapter 18, Division 1, Section 1804.5–Liquefaction Potential and Soil Strength Loss.

The Project Site is on relatively level terrain. According to the California Division of Mine and Geology Seismic Hazard Zones Map of the Beverly Hills Quadrangle[29] and the City of Los Angeles Safety Element,[30] the Project Site is not in a designated earthquake-induced landslide hazard zone. Therefore, the probability of landslides is considered to be very low. No impacts would occur.

***Mitigation Measures*:** No mitigation measures are necessary.

### *e. Result in substantial soil erosion or the loss of topsoil?*

**Less than Significant Impact**. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have significant sedimentation or erosion impacts if it would (a) constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or (b) accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition that would not be contained or controlled on site.

Although development of the Project Site has the potential to result in the erosion of soils during site preparation and construction activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City of Los Angeles through grading and building permit regulations. Minor amounts of erosion and siltation could occur during grading. The potential for soil erosion during the ongoing operation of the Project is extremely low due to the predominantly level topography of the site; furthermore, the Project Site would be almost entirely built upon, with little or no soil exposed.

All grading activities would require grading permits from the Los Angeles Department of Building and Safety (LADBS) and would be required to comply with the standards designed to limit potential erosion impacts. All on-site grading and site preparation would comply with applicable provisions of Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. The grading plan would conform to the City's Landform Grading Manual Guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division. Further, the Department of Building and Safety requires all applicants, as a condition for issuing a grading or building permit, to incorporate into the plan documents BMPs necessary to control stormwater pollution from sediments, erosion, and construction materials leaving the construction site. These requirements are further defined in the Development Best Management Practices Handbook, Part A Construction Activities. For these reasons, Project impacts would less than significant.

29 California Department of Conservation, Division of Mines and Geology, "Seismic Hazard Zone Report for the Hollywood 7.5-Minute Quadrangle, Los Angeles County, California" (1998).

30 *City of Los Angeles General Plan*, "Safety Element" (1996), Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of the existing environmental conditions?*

**Less than Significant Impact**. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure or expose people to substantial risk of injury. For this specific issue, a significant impact could occur if the Project is built in an unstable area without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

As previously discussed, the Project Site is located within an area identified as having a potential for liquefaction. However, the design and construction of the Project would be to the satisfaction of the LADBS to ensure favorable conditions for the permanent retaining structure. Additionally, construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code (Building Code) which is designed to ensure safe construction and includes building foundation requirements appropriate to site conditions. Code requirements to prevent soil erosion and liquefaction would be implemented.

For all these reasons, Project Impacts would less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *g. Be located on expansive soil, as defined in table 18-1-b of the Uniform Building Code (1994), creating substantial risks to life or property caused in whole or in part by the project exacerbating the expansive soil conditions?*

**Less than Significant Impact**. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant geologic hazard impact if it were to cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure or expose people to substantial risk of injury. For this specific issue, a significant impact could occur if a project were built on expansive soils without proper site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property. Expansive soils contain significant amounts of clay particles that swell considerably when wetted and that shrink when dried. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. Without proper mitigation measures, heaving and cracking of both building foundations and slabs-on-grade could result.

The Project Site is currently improved with the existing Windward School campus and apartment building. Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, Los Angeles Municipal Code and other applicable building codes which includes building foundation requirements appropriate to site-specific conditions. Therefore, impacts would less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *h. 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?*

**No Impact.** The Project Site is located in a developed area that is served by the wastewater collection, conveyance, and treatment system operated by the City of Los Angeles. The Project's wastewater demand would be accommodated via connections to this existing wastewater infrastructure. No septic tanks or alternative disposal systems would be utilized. Moreover, there is no construction proposed or contemplated on the remaining properties within the Project Site. For all these reasons, no impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.7 GREENHOUSE GAS EMISSIONS

## Impact Analysis

### *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.** A significant impact could occur if the Project would generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment. GHG emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature. Although scientists disagree as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that a direct link exists between increased emission of GHGs and long-term global temperature.

As detailed therein, construction and operational GHG emissions were modeled using CalEEMod for each year of construction of the Project and for a typical year of operation. The estimated emissions from existing uses on the site were subtracted from the estimated emissions resulting from the Project at the end of Phase 3 to calculate a potential net change in emissions. The California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. Although GHG emissions are quantified and shown in **Table 5.7-1: Construction GHG Emissions** and **Table 5.7-2: Annual GHG Summary**, CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project. As shown, the net increase in GHG emissions generated by the Project from existing conditions would be 746 MTCO2e per year.

**Table 5.7-1**
**Construction GHG Emissions**

| Year | CO2e Emissions (Metric Tons per Year) |
|---|---|
| Phase 1 | 176 |
| Phase 2 | 350 |
| Phase 3 | 67 |
| **Total Construction GHG Emissions** | 593 |
| **Annualized over Project's Lifetime** | 20 |

*Source: Refer to **Appendix A (Annual)**, Section 2.1: Overall Construction.*

**Table 5.7-2**
**Annual GHG Summary**

| GHG Emissions Source | Existing Emissions (MTCO2e/year) | Project Buildout Emissions (MTCO2e/year)[a] | Total Net Emissions (MTCO2e/year) |
|---|---|---|---|
| Construction (amortized) | - | 20 | +20 |
| Operational (mobile) sources* | *442* | 755 | +313 |
| Area sources | *4* | 4 | <1 |
| Energy | *409* | 721 | +312 |
| Waste | *64* | 116 | +52 |
| Water | *90* | 139 | +49 |
| **Total** | ***1,009*** | ***1,755*** | **+746** |

*Source: Refer to **Appendix A** (Annual), Section 2.2: Overall Operation.*

*[a] This includes the total emissions from Phase 1 plus Phase 2 plus Phase 3 and existing operation.*

Assessing the significance of a project's contribution to cumulative global climate change involves (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional state agency. As described below, the Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the Palms-Mar Vista-Del Rey Community Plan Area, LA Green Plan and Sustainable City pLAn. As such, impacts would be less than significant.

Furthermore, neither the SCAQMD nor the CEQA Guidelines Amendments adopted by the Natural Resources Agency on December 30, 2009, provide any adopted thresholds of significance for addressing a mixed-use project's GHG emissions. Nonetheless, Section 15064.4 of the CEQA Guidelines Amendments serves to assist lead agencies in determining the significance of the impacts of GHGs. Because the City of Los Angeles does not have an adopted quantitative threshold of significance for generation of GHG emissions, the following analysis is based on a combination of the requirements outlined in the CEQA Guidelines. As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) an estimate of the amount of GHG emissions resulting from the Project; (2) a qualitative analysis or performance-based standards; (3) a quantification of the extent to which the Project increases GHG emissions as compared to the existing environmental setting; and (4) the extent to which the Project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

In addition, as a central component of the CEQA Guidelines, substantial evidence supports that compliance with the LA Green Building Code is qualitatively consistent with Statewide goals and policies

in place for the reduction of GHG emissions. This includes Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, which requires a Statewide reduction of GHG emissions to 1990 levels by 2020 and requires the CARB to develop a Scoping Plan that describes the approach the State will take to achieve these emissions goals. The 2017 Scoping Plan,[31] approved on December 14, 2017, builds on previous programs and takes aim at the 2030 target established by the 2016 SB 32 (Pavley). The Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated Renewables Portfolio Standard (RPS) requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard and aims to reduce emissions of methane and hydrofluorocarbons by 40 percent from 2013 levels by 2030, and emissions of black carbon by 50 percent from 2013 levels. Furthermore, the City adopted the LA Green Plan to provide a Citywide plan for achieving the City's GHG emissions targets, for both the existing and future generations of GHG emissions.[32] To further implement the LA Green Plan's goal of improving energy conservation and efficiency, the Los Angeles City Council has adopted multiple ordinances and updates to establish the current Los Angeles Green Building Code as it applies to new development projects.

With respect to new development, the City has adopted the LA Green Building Code (Ordinance No. 181480) in December 2016, which incorporates applicable provisions of the CALGreen Code and, in some cases, outlines stricter GHG reduction measures available to development projects in the City. The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code and is applicable to the construction of every new building, every new building alteration with a permit valuation of more than $200,000, and every building addition unless otherwise noted. The LA Green Building Code requires projects to achieve a 20 percent reduction in potable water use and wastewater generation; to comply with the current 2016 Title 24 Standards adopted by the California Energy Commission on January 1, 2017; and to meet 75 percent diversion of solid waste consistent with AB 341.[33] The Scoping Plan encourages communities to adopt building codes that go beyond the State code. Accordingly, given that the LA Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that can demonstrate it complies with the LA Green Building Code is considered consistent with Statewide GHG reduction goals and policies, including AB 32, and does not make a cumulatively considerable contribution to global warming.

31 CARB, *California's 2017 Climate Change Scoping Plan*, November 2017, accessed August 2018, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

32 City of La, "Green LA – An Action Plan to Lead the Nation In Fighting Global Warming" (May 2007), accessed August 2018, http://environmentla.org/pdf/GreenLA_CAP_2007.pdf.

33 City of Los Angeles Department of Building and Safety, Green Building & Sustainability, https://www.ladbs.org/services/green-building-sustainability, accessed October 2018.

As described below, the Project would be consistent with the City of Los Angeles goals and actions to reduce the generation and emission of GHGs from both public and private activities pursuant to the applicable portions of the AB 32, Senate Bill (SB) 375, and the LA Green Building Code. Impacts would be less than significant.

***Mitigation Measures***: No mitigation measures are necessary.

### *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 goal of AB 32 is to reduce Statewide GHG emissions to 1990 levels by 2020. As previously noted, in 2014, the CARB updated the Scoping Plan, which details strategies to meet that goal. On September 8, 2016, Governor Brown enacted SB 32 that extends AB 32 another ten years to 2030 and increase the State's objectives. SB 32 calls on Statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In addition, AB 197 requires CARB to approve a statewide GHG emissions limit equivalent to the statewide GHG emission level in 1990 to be achieved by 2030. SB 32 requires ARB to prepare and approve a scoping plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions.

## *Green Building Standards (CALGreen) Code*

In November 2008, the California Building Standards Commission established the California Green Building Standard Code (CALGreen Code), which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. As of January 1, 2011, the CALGreen Code is mandatory for all new building construction in the State. The CALGreen Code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code, and is applicable to the construction of every new building, every new building alteration with a permit valuation of over $200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. In 2016, the Los Angeles City Council adopted the 2017 Los Angeles Green Building Code, which is in effect as of January 1, 2017. The 2017 Los Angeles Green Building Code contains mandatory measures for residential and nonresidential development related to site development; water

use; weather resistance and moisture development; construction waste reduction; disposal and recycling; building maintenance and operation; pollutant control; indoor air quality; environmental comfort; outdoor air quality; and electric vehicle charging requirements. As described previously, the Project would be required to adhere to the LA Green Building Code, which would be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. In addition, the Project would meet this design standard and exceed it by achieving LEED Gold, which support City goals to help develop a more sustainable community. Impacts would be less than significant.

## *City of Los Angeles Sustainable City pLAn*

On April 8, 2015, the City of Los Angeles released the Sustainable City pLAn (pLAn) which defines a roadmap for actions to be taken by the City over the next 20 years to create a City that is environmentally healthy, economically prosperous, and equitable in opportunity. The pLAn addresses increasing local water and solar energy resources, energy efficiency in new buildings, carbon and climate leadership and waste and landfills.

On carbon and climate leadership, the pLAn states that the City will reduce GHG emissions below the 1990 levels called for by state law by 2020. The City's objectives are to reduce GHG emissions below 1990 baseline by at least 45 percent by 2025, 60 percent by 2035 and 80 percent by 2050. By 2017, the City will develop a comprehensive climate action and adaptation plan. Strategies and policy initiative include creating a benchmarking policy for building energy use, and incentivizing or requiring LEED Silver or better for new construction.

The Project would be consistent with the planed land use and population growth within the area and would not conflict with the AQMP. SCAG's landfill capacity MM USS-6(b) states that 75 percent of the waste stream would be recycled and waste reduction goal by 50 percent that are within responsibility set forth by the City.[34] In addition, the Project would be designed to LADBS and LEED Gold standards, under the existing campus LEED Gold certification. As the Project would comply with the LA Green Building Code, the Project would also be consistent with local and Statewide goals and policies aimed at reducing the generation of GHGs. The Project's generation of GHG emissions would not make a cumulatively considerable contribution to or conflict with an applicable plan, policy, or regulation for the purposes of reducing the emissions of greenhouse gasses. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

34 SCAG, *Mitigation Monitoring and Reporting Program*, Adopted April 2016, http://scagrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf

# 5.8 HAZARDS AND HAZARDOUS MATERIALS

## Impact Analysis

### *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.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact to hazards and hazardous materials if (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. The types and amounts of hazardous materials that would be used in connection with the Project would include typical household products used by the hotel staff (e.g., cleaning solutions, solvents, pesticides for landscaping, painting supplies, and petroleum products). The routine use and disposal of normal household products is not considered to create a significant hazard to the public or the environment.

Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, transmission fluids, solvents, and other acidic and alkaline solutions that would require special handling, transport, and disposal. However, all potentially hazardous materials would be used and stored in accordance with applicable federal, State, and Local regulations. Additionally, the City of Los Angeles Fire Department (LAFD) would have the authority to perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of hazardous materials and wastes. As such, the Project would not create a significant hazard to the public or the environment. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact to hazards and hazardous materials if (a) A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or (b) A project involved the creation of any health hazard or potential health hazard. A common list of potentially hazardous materials that may be found at the Project Site could consist of, but are not limited to, the following:

### Household Products

By far the most common hazardous materials are those found or used in the home for such activities as cleaning, painting, and pest control. However, it is expected that household products would be used and stored in accordance with applicable federal, State, and local regulations. Impacts would be less than significant.

### Asbestos-Containing Materials

Asbestos is a crumbly material often found in older buildings, typically used as insulation in walls or ceilings. It was formerly popular as an insulating material because it had the desirable characteristic of being fire resistant and asbestos-containing materials were taken off the market in 1984. However, it can pose a health risk when very small particles become airborne. These dust-like particles can be inhaled, where their microscopically sharp structures can puncture the tiny air sacs in the lungs, resulting in long-term health problems. The Department of Toxic Substance Control (DTSC) classifies asbestos waste as potentially hazardous if it is greater than 1 percent and easily crumbled (friable). The existing school structures were built in 1991, therefore the potential that asbestos-containing material was used in the building is low. Based on the age of the existing apartment building, which was built in approximately 1959, the potential for asbestos-containing building materials is possible. However, any asbestos-containing materials would be properly removed and abated as required by State law, specifically Title 22 of the California Code of Regulations, the California Health and Safety Code, including the Hazardous Waste Control Law. In addition, the Applicant would be required to comply with SCAQMD's Rule 1403 regarding the handling and disposal of asbestos-containing materials on the Project Site. Impacts would be less than significant.

### Lead-Based Paint

Although lead-based paint has been taken off the market, it is estimated that 80 percent of buildings built prior to 1978 contain lead paint. Based on the age of the existing apartment building there is a potential for lead-based paint at the Project Site. As such, the Applicant would be required to meet regulatory requirements for abatement, including standard handling and disposal practices shall be implemented pursuant to the California Occupational Safety and Health Administration (CALOSHA) regulations. Impacts would be less than significant.

### Polychlorinated Biphenyls

Polychlorinated Biphenyls (PCBs) are man-made organic chemicals that were formerly manufactured for use in various industrial and commercial applications as a result of their nonflammability, chemical stability, high boiling point, and electrical insulating properties. While the manufacture of PCBs was

banned in 1979, these hazardous materials may be found in products associated with transformers, electrical equipment, motor oil, hydraulic systems, cable and thermal insulation, adhesives and tapes, oil-based paint, caulking, plastics, and floor finish.[35] Based on the age of the existing buildings comprising the Windward School campus, the potential to uncover PCBs is considered low. However, as previously mentioned the existing apartment building was built in 1959 and, therefore, has a higher likelihood of containing PCBs. The Applicant would be required to meet regulatory requirements for abatement, including applicable State and Federal rules and regulations, such as the Toxic Substances Control Act (TSCA), and Part 761 in Title 40 of the Code of Federal Regulations published by the EPA.[36] Impacts would be less than significant.

### Methane and Radon Gas

According to the City's parcel records, the Project Site is not located within a Methane Buffer Zone.[37] According to the Radon Potential Zone Map for Southern Los Angeles County, California,[38] the Project Site is not located within a radon zone. No further investigations related to these hazards would be required and impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact to hazards and hazardous materials if (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or (b) the project involved the creation of any health hazard or potential health hazard. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;

35 US Environmental Protection Agency (USEPA), "Polychlorinated Biphenyls," http://www.epa.gov/wastes/hazard/tsd/pcbs/about.htm (accessed September 2018).

36 Environmental Protection Agency, https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs (accessed September 2018).

37 City of Los Angeles Department of Planning, *Zone Information and Map Access System (ZIMAS)*, http://zimas.lacity.org/, accessed August 2018.

38 California Geologic Survey, "Radon Potential Zone Map for Southern Los Angeles County, California," map, prepared by Ron Churchill (January 2005), http://www.conservation.ca.gov/cgs/minerals/hazardous_minerals/radon/Documents/sr182map.pdf.

(d) the probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

Implementation of the Project would take place within an existing school campus. Construction of the Project may involve the use of hazardous materials. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short-term or one time in nature and would cease upon project completion. Additionally, these potentially hazardous materials would be used and stored in accordance with applicable federal, State, and local regulations to not pose a hazard to those students on the Project Site. All spills or leakages of petroleum products during construction activities would be required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations regarding the cleanup and disposal of the contaminant released. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Strict adherence to all emergency response plan requirements set forth by the City and LAFD would also be required through the duration of the project construction.

As previously discussed, the demolition of the existing apartment building may result in the potential exposure to release asbestos-containing materials and lead-based paint on the Project Site. However, the handling and disposal of any asbestos-containing materials or lead-based paint would be required to comply with applicable State and local requirements. As discussed in **Section 5.3: Air Quality**, construction of the Project would release small quantities of toxic air contaminants for a short period of time; however, the magnitude of these emissions is not sufficient to create substantial concentrations of hazardous pollutants and the emissions are below applicable SCAQMD thresholds. Furthermore, there are no existing hazards on the Project Site from past uses. Therefore, the Project would not create a significant hazard through hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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 exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?*

**Less than Significant Impact.** The Project Site is currently developed with the existing Windward School campus and apartment building. There are approximately three (3) leaking underground storage tanks

(LUSTs) within one-half mile of the Project Site, all of which have been remediated or are currently under remediation with the State Water Resources Control Board (SWRCB).[39] Based on the distance to the Project Site and the status of the cases, these properties are not considered to pose a significant hazard to the Project Site. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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 exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?*

**No Impact.** A significant impact may occur if a project were located within a public airport land use plan area or within 2 miles of a public airport and subject to a safety hazard. The closest public airport to the Project Site is the Santa Monica Municipal Airport and is within 2 miles of the Project Site to the west. However, the Project Site is not listed as being within an Airport Hazard zone,[40] nor is it located within the Airport Influence Area.[41] As such, the Project would not interfere with any adopted plan nor result in a safety hazard for students or employees in the area. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. For a project within the vicinity of a private airstrip, would the project exacerbate current environmental conditions so as to result in a safety hazard for people residing or working in the project area?*

**No Impact.** The Project Site is not located in the vicinity of a private airstrip or within an area that would expose students or employees to a safety hazard. No impacts would occur.

***Mitigation Measures*:** No mitigation measures are necessary.

### *g. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact to hazards and hazardous materials if the project involved possible

39 These lists include, but are not limited to, the Envirostor (http://www.envirostor.dtsc.ca.gov/public/) and GeoTracker (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and SWRCB, respectively

40 City of Los Angeles Department of Planning, *Zone Information and Map Access System (ZIMAS)*, http://zimas.lacity.org/, accessed August 2018

41 County of Los Angeles, Airport Land Use Commission, "Santa Monica Municipal Airport–Airport Influence Area," http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf (May 13, 2003).

interference with an emergency response plan or emergency evacuation plan. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the degree to which the project may require a new (or interfere with an existing) emergency response or evacuation plan, and the severity of the consequences.

The Project Site is located at the southwest corner of the intersection of Palms Boulevard and Sawtelle Boulevard; neither is a selected disaster route as identified by the City's General Plan.[42] While it is expected that the majority of construction activities for the Project would be confined to the Project Site, limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which may result in temporary lane closures that could have the potential to interfere with established emergency response or evacuation plans. However, any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *h. Exacerbate existing hazardous environmental conditions by bringing people or structures into areas that are susceptible to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

**No Impact.** The Project Site is in an urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not in a Very High Fire Hazard Severity Zone.[43] No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

42 *City of Los Angeles General Plan* "Safety Element" (1996), Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles.

43 City of Los Angeles Department of City Planning, *ZIMAS,* "Parcel Profile Reports," http://www.zimas.lacity.org, accessed September 2018.

# 5.9 HYDROLOGY AND WATER QUALITY

## Impact Analysis

### *a. Would the project violate any water quality standards or waste discharge requirements?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body. For this specific issue, a significant impact may occur if the Project would discharge water that does not meet the quality standards of local agencies that regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if the project does not comply with all applicable regulations with regard to surface water quality as governed by the State Water Resources Control Board (SWRCB). These regulations include the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

#### Construction Impacts

The three general sources of potential short-term, construction-related stormwater pollution associated with the Project are (1) the handling, storage, and disposal of construction materials containing pollutants; (2) the maintenance and operation of construction equipment; and (3) earthmoving activities, which, when not controlled, may generate soil erosion via storm runoff or mechanical equipment. Under the NPDES, the Project Applicant is responsible for preparing a Storm Water Pollution Prevention Plan (SWPPP) to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system.

Surface water runoff from the Project Site would continue to be collected on the Project Site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention will be required as part of the Low Impact Development (LID) and SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. As such, runoff from the Project Site currently is, and would continue to be, collected on the site and directed toward existing storm drains in the Project vicinity and would not affect local water quality, including that of the Sepulveda Channel.

Additionally, any pollutants on the Project Site would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance. The Project would be required to demonstrate compliance with

LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period, which would reduce the Project's impact to the stormwater infrastructure. The Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. With regulatory compliance, any potential water quality impacts from the Project during construction would be less than significant.

### Operation Impacts

The Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. City of Los Angeles Ordinance Nos. 172,176 and 173,494 specify Storm Water and Urban Runoff Pollution Control, which requires the application of BMPs. The Project would also comply with water quality standards and wastewater discharge requirements set forth by the SUSMP for Los Angeles County and Cities in Los Angeles County and approved by the Los Angeles Regional Water Quality Control Board (LARWQCB). Full compliance with the LID Ordinance and implementation of design-related BMPs would ensure that the operation of the Project would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?***

**Less than Significant Impact**. Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on groundwater level if it would change potable water levels sufficiently to (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

The Project Site is currently developed with an existing school campus and apartment building. The Project Site primarily consists of impervious surfaces with some landscaping characterized by grass, trees, shrubs,

and other ornamental plants. Implementation of the Project would not result in a substantial change in the amount of pervious and impervious surfaces across the Project Site. The Project is not adjacent to a well field nor part of a substantial groundwater recharge area. Most of the surface water runoff from the Project Site is directed to adjacent storm drains though some percolation occurs around the existing residential properties.

Though stormwater does percolate into the ground under existing conditions, the proposed changes would not be of a magnitude to result in demonstrable reduction in groundwater recharge. Therefore, the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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, in a manner which would result in substantial erosion or siltation on- or off-site?*

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The Project Site is in a highly urbanized area of Los Angeles, and no streams or river courses are located on or within the Project vicinity. The Sepulveda Channel bisects the Project Site, which is a Los Angeles County Flood Control District drainage facility-maintained facility. As previously discussed, stormwater runoff on the Project Site currently flows into existing City streets and drains. Implementation of the Project would not result in a substantial change in the amount of pervious and impervious surfaces across the Project Site, and thus would not result in any changes in the local drainage patterns. Implementation of a SWPPP for the Project would reduce the amount of surface water runoff after storm events because the Project would be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing three-quarters of an inch of rainfall in a 24-hour period. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***d. 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 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.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on surface water hydrology if it would result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. Implementation of the Project would not result in a significant increase in site runoff or cause any changes in the local drainage patterns that would result in flooding on or off site. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***e. Would the project 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?***

**Less than Significant Impact.** Based on the criteria established in the *L.A. CEQA Thresholds Guide*, a project could have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level that exceeds the capacity of the storm drain system serving the Project Site. A Project-related significant adverse effect would also occur if the Project would substantially increase the probability that polluted runoff would reach the storm drain system.

The Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site currently is, and would continue to be, collected on the site and directed toward existing storm drains in the Project vicinity that have adequate capacity. Pursuant to local practice and City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increased imperviousness of the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, any pollutants from the parking areas would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters of an inch of rainfall in a 24-hour period. The Project would not

create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. Would the project otherwise substantially degrade water quality?*

**Less than Significant Impact.** A significant impact could occur if the Project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Construction of the Project, such as grading and excavation activities, could potentially degrade water quality through erosion and subsequent sedimentation. However, the implementation of BMPs and compliance with all federal, State, and local regulations governing stormwater discharge would reduce the impacts of the Project on surrounding water quality. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?*

**No Impact.** A significant impact could occur if the Project were to place housing within a 100-year flood hazard area. A 100-year flood is defined as a flood that results from a severe rainstorm with a probability of occurring approximately once every 100 years. According to the Safety Element of the City's General Plan, the Project Site is not within a designated flood zone.[44] Therefore, no impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

### *h. Would the project place within a 100-year flood hazard area structures, which would impede or redirect flood flows?*

**No Impact.** A significant impact could occur if a Project were located within a 100-year flood zone and would impede or redirect flood flows. The Project Site is not in an area designated as a 100-year flood hazard area. The Project Site is in a highly-urbanized area, and no changes to the local drainage pattern would occur with implementation of the Project. Therefore, the Project would not have the potential to impede or redirect floodwater flows. No impact would occur.

44 *City of Los Angeles General Plan*, "Safety Element" (1996), Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, (1996).

***Mitigation Measures:*** No mitigation measures are necessary.

### *i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?*

**Less than Significant Impact.** A significant impact could occur if the Project were to expose people or structures to a significant risk of loss or death caused by the failure of a levee or dam. According to the Safety Element of the City General Plan, the Project Site is located within a potential inundation area.[45] Given that the Project Site is in a dense urban area surrounded by existing urban uses, the proposed Project would not introduce people or structures into an area where they would be subject to flood hazards not previously experienced. In the circumstance of a dam inundation event, there would be ample time to evacuate all individuals on the Project Site to higher ground prior to the onset of any flooding hazards. As such, the Project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *j. Would the project expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow?*

**No Impact.** A significant impact would occur if the Project Site were sufficiently close to the ocean or other water body to potentially be at risk of the effects of seismically induced tidal phenomena (e.g., seiche and tsunami), or if the Project Site were located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows. The Project Site more than 3.5 miles from the ocean, and is not in a potential seiche or tsunami zone. With respect to the potential impact from a mudflow, the Project Site is relatively flat and is surrounded by urban development. Therefore, there are no sources of mudflow within the vicinity of the Project Site. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

45 *City of Los Angeles General Plan*, "Safety Element" (1996), Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, (1996).

# 5.10 LAND USE AND PLANNING

## Impact Analysis

### *a. Would the project physically divide an established community?*

**No Impact**. A significant impact could occur if a project were to be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to *the L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case- by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed Project.

The Project Site is in the Palms-Mar Vista-Del Rey Community Plan Area of the City of Los Angeles. The neighborhood is urbanized and is primarily characterized by various open space and single- and multi-family residential uses. Implementation of the Project involves improvements to an existing school campus and an increase in student enrollment. The proposed improvements would occur within the existing Windward School campus and would not divide any established residential communities surrounding the Project Site. While the Project also involves the demolition of the existing apartment building, this building is located directly adjacent to the existing school facilities. The demolition of the apartment building would not alter any street patterns or separate uses or disrupt access between land use types. Therefore, the Project would not significantly disrupt or divide the physical arrangement of the established community. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

### *b. Would the project conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

**Less than Significant Impact.** A significant impact could occur if a project were to be inconsistent with the *General Plan* or zoning designations currently applicable to a Project Site, and would cause adverse environmental effects, which the General Plan and Zoning Ordinance are designed to avoid or mitigate.

The Project Site is within the jurisdiction of the City of Los Angeles and is therefore subject to the designations and regulations of several local and regional land use plans and the municipal zoning code.

***Regional Plans***

***SCAQMD Air Quality Management Plan.*** The Project is located within the South Coast Air Basin (Basin) and, therefore, falls under the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. As mentioned, the SCAQMD's AQMP was updated in 2016 to establish a comprehensive air pollution control program leading to the attainment of State and federal air quality standards in the Basin, which is a nonattainment area.[46] The Project conforms to the zoning and land use designations for the Project Site as identified in the General Plan, and, as such, would not add emissions to the Basin that were not already accounted for in the approved AQMP. As noted in **Section 5.3: Air Quality**, the Project would not exceed the daily emissions thresholds during the construction or operational phases. The Project would be consistent with the AQMP.

***SCAG Regional Comprehensive Plan*.** The Project Site is within the six-county region that makes up the SCAG planning area. The SCAG RCP includes growth management policies that strive to improve the standard of living, maintain the regional quality of life, and provide social, political, and cultural equity. The guiding principles of the RCP are (1) Improve mobility for all residents; (2) Foster livability in all communities; (3) Enable prosperity for all people; and (4) Promote sustainability for future generations.

The Project would be consistent with policies set forth in the RCP because it would revitalize an existing school campus to meet the immediate and long-term educational needs of the campus community within the City. Relevant land use goals of the RCP include focusing growth along transportation corridors; targeting growth within walking distance of transit; and injecting new life into under-used areas. The Project would further these strategies by implementing improvements to the existing school campus within walking distance of public transit and located within a Transit Priority Area (TPA). Impacts would be less than significant.

***SCAG 2016 RTP/SCS.*** The SCAG 2016 RTP/SCS includes the long-term vision of how the SCAG region would address regional transportation and land use challenges and opportunities. The Project would be consistent with policies set forth in the 2016 RTP/SCS, as the Project would increase the utilization of an existing school campus within a TPA. In addition, the Project would not result in a direct increase in population or employment. The Project would be consistent with SCAG's future growth projections as it serves to accommodate immediate and long-term educational needs of the campus community within the City. Impacts would be less than significant.

46 Air Quality Management District (AQMD), *Final 2012 Air Quality Management Plan,* http://www.aqmd.gov/aqmp/2012aqmp/Final/index.html.

***Local Plans***

***City of Los Angeles General Plan*.** The land use component of the City of Los Angeles General Plan is set forth in the General Plan Framework (GPF) and in Community Plans. The GPF sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. GPF land use policies are further guided at the community level through community plans and specific plans. The GPF Land Use chapter designates single- and multi-family and open space land uses, and provides policies applicable to each land use to support the vitality of the City's residential neighborhoods. The Framework Element identifies allows for infill development within single-family neighborhoods provided that it is compatible with and maintains the scale and character of existing development. The Framework Element provides that any loss of potential units in multi-family neighborhoods can be offset by the provision of new housing opportunities in mixed-use districts, centers, and boulevards. Lastly, the Framework Element identifies that open space uses encompass both publicly- and privately-owned properties that are used for the preservation of natural resources.

The Project would implement infill development to revitalize the existing school campus while maintaining a compatible scale and character with the surrounding residential neighborhoods of the Community Plan. While the Project would result in the demolition of an existing apartment building on the Project Site, the Framework Element provides that these housing units can be offset by the provision of new housing opportunities within the City. The facility improvements and the construction of a pedestrian bridge and student gathering plaza over the Sepulveda Channel would not diminish the identity of this open space area. As such, the Project is consistent with the General Plan Framework.

***Los Angeles Municipal Code***. Development of the Project Site is subject to the constraints of the Los Angeles Municipal Code (LAMC), especially Chapter I, the Planning and Zoning Code.

The Project Site is zoned R1, R3, and OS. R1 permits single-family dwellings, parks, playgrounds, and community centers. R3 permits the R1 uses, plus multiple-family dwellings and child care. OS permits a range of open space uses including parks and recreation facilities, nature reserves, and water conservation areas.

The property that is owned by Windward and currently developed with an apartment building is zoned as R-3, with the portion of that parcel that is developed with a surface parking lot zoned as [Q]R-3. The Q Condition limits the use of that portion of the parcel to surface parking for the adjacent residential uses. Furthermore, the parcel that makes up the northern portion of the campus was changed to a new R1V2

designation. This new R1V2 designation includes new development standards related to height, residential floor area, encroachment plane, offset/plane break, and yard setbacks.

The Applicant has also requested the City approve a number of discretionary actions related to the Project's conformance with the LAMC. The City may approve these requests after it has determined that the Project would support the overall planning and housing policies of the City, would enhance the neighborhood, and would not adversely affect or degrade adjacent properties, among other required findings. Impacts would be less than significant.

***Mitigation Measures****:* No mitigation measures are necessary.

### *c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

**No Impact.** A project-related significant adverse effect could occur if a Project Site were located within an area governed by a habitat conservation plan or natural community conservation plan.

No conservation plans presently exist which govern any portion of the Project Site. Further, the Project Site is within a heavily urbanized area of Los Angeles. Therefore, the Project would not conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.11 MINERAL RESOURCES

## Impact Analysis

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

**No Impact.** A significant impact could occur if a Project Site were located in an area used or available for extraction of a regionally important mineral resource, or if a project were to convert an existing or future regionally important mineral extraction use to another use, or if a project were to affect access to a site used or potentially available for regionally important mineral resource extraction. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering (a) whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone 2 (MRZ-2) Area, or other known or potential mineral resource area, and (b) whether the mineral resource is of regional or Statewide significance, or is noted in the Conservation Element as being of local importance.

The Project Site is within a developed and urbanized area within the City of Los Angeles and is not used for mineral resource extraction. The Project Site is not within a designated MRZ-2 Area, a Surface Mining District, or an Oil Field/Drilling Area.[47] No mineral resources are known to exist beneath the Project Site. Thus, implementation of the Project would not result in the loss of availability of a known mineral resource that would be of local importance or of value to the region and the residents of the State. No impact would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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 noted, the Project Site is not located within a MRZ-2 Area. The Project Site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Therefore, no impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

47 *City of Los Angeles General Plan,* "Conservation Element" (January 2001) Exhibit A–Mineral Resources.

# 5.12 NOISE

## Impact Analysis

### *a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

**Less than Significant with Project Mitigation.** A significant impact could occur if a project would generate excessive noise that would cause the ambient noise environment to exceed noise level standards set forth in the City of Los Angeles Noise Ordinance (Noise Ordinance) or the City of Los Angeles CEQA Thresholds Guide. The City's Noise Ordinance (Section 112.05 of the LAMC) prohibits construction equipment noise that produces a maximum noise level exceeding 75 dB(A) at a distance of 50 feet. However, the Noise ordinance also states that this limitation does not apply where compliance is technically infeasible. According to the City of Los Angeles CEQA Threshold Guide, a significant noise impact could occur if construction activities lasting more than one day would increase the ambient noise levels by 10 dB(A) or more at a noise-sensitive location or construction activities lasting more than 10 days in a three-month period would increase ambient noise levels by 5 dB(A) or more at a noise-sensitive location. The Threshold Guide defines sensitive uses as "residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks."[48]

The existing noise environment in the Project area is characterized by the area's general level of development which includes vehicular traffic in the surrounding area and everyday school operation at the Project Site, and that typically generated by multifamily residential uses. Areas which are not urbanized are relatively quiet, while areas which are more urbanized are noisier as a result of roadway traffic, industrial uses, and other human-related activities. To identify the existing ambient noise levels at nearby off-site sensitive receptors as well as the general vicinity of the Project Site, noise measurements were taken using monitoring equipment that conforms to industry standards and the requirement specified in Section 111.01(l) of the LAMC. **Figure 5.12-1: Noise Monitoring Locations** shows the locations of each of the noise monitoring measurements**. Table 5.12-1: Existing Noise Levels** summarizes typical ambient noise levels based on the amount of development in the Project Site area.

48 City of Los Angeles, L.A. CEQA Thresholds Guide (2006), p. I.1-3.


**SOURCE:** Google Earth - 2018

FIGURE **5.12-1**

Meridian Consultants

# Noise Monitoring Locations

177-001-17

**Table 5.12-1**
**Existing Noise Levels**

| Site | Location | Type of Use | Leq (15-minute) dBA |
|---|---|---|---|
| Site 1 | East side of Sawtelle Blvd, outside of 3450 Sawtelle Blvd lobby | Residential/School | 68.1 |
| Site 2 | South side of Westminster Ave., approx. 60 feet west of Sawtelle Blvd | Residential | 61.1 |
| Site 3 | South side of Westminster Ave., midway down the football field | Residential/School | 55.4 |
| Site 4 | 8440 Butler Avenue, approx. 50 feet south of Palms Blvd | Residential | 60.1 |
| Site 5 | East side of Sawtelle Blvd, south of Westminster Ave | Residential | 71.4 |
| Site 6 | 11500 Palms Blvd, South side of Palms Blvd | Residential | 73.6 |

*Note: Measurements were taken on Tuesday, September 26, 2017 from 7:00 AM through 9:00 AM.*
*Source: Noise Measurement Datasheets contained in **Appendix B.1** of this EIR*

## Construction

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, equipment locations, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction of the Project would involve the following phases of activity:

As described in **Table 3.0-1**, Phase 1 includes demolition of the existing classroom, black box theater and administration building (12,960 square feet) for construction of the new classroom, theater and administration building (22,630 square feet). Construction activities associated with this phase of the Project include three main steps: (1) demolition/site clearing, (2) site preparation, and (3) building construction. Construction of Phase 1 is anticipated to occur over a period of 14 months, from summer 2019 through summer 2020.

Phase 2 includes demolition of the existing apartment building (13,600 square feet) to allow for construction of the new Arts and Innovation Center (58,190 square feet). Construction activities associated with this phase of the Project include three main steps: (1) demolition/site preparation, (2) grading, and (3) building construction. Construction of Phase 2 is anticipated to occur over a period of 24 months, from summer 2021 through late spring 2023.

Phase 3 includes construction of a student gathering plaza (4,065 square feet) and would not involve the addition of any building floor area on the Project site. This Phase is anticipated to occur over a period of

6 months, during 2025. Construction activities associated with this phase of the Project would only include three main steps: (1) site preparation, (2) grading, and (3) building construction.

As would be the case for construction of most land use development projects, construction of the proposed Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level. Maximum noise levels would occur when equipment is operating under full power conditions, as shown in **Table 5.12-2: Applicable Construction Equipment Noise Levels**. The usage factors are based on the FHWA Roadway Construction Noise Models User's Guide.[49] To more accurately characterize construction-period noise levels, the average (hourly Leq) noise level associated with each construction phase is estimated based on the quantity, type, and usage factors for each type of equipment used during each construction phase and are typically attributable to multiple pieces of equipment operating simultaneously.

**Table 5.12-2**
**Applicable Construction Equipment Noise Levels**

| Type of Equipment | Estimated Usage Factor (%) | Spec 721.560 Lmax at 50 feet (dBA, slow) | Reference Noise Level at 50 feet (dBA, Lmax) |
|---|---|---|---|
| Air compressors | 40 | 80 | 78 |
| Backhoes | 40 | 80 | 78 |
| Concrete/Industrial saws | 20 | 90 | 90 |
| Dozers | 40 | 85 | 82 |
| Forklift | 10 | 85 | 75 |
| Graders | 40 | 85 | 85 |

*Source: FHWA Construction Noise Handbook, August 2006.*

During Project construction, the nearest sensitive receptors are the single- and multifamily residential uses along Sawtelle Boulevard (REC-1) 50 feet to the east, single-family residential uses along Westminster Avenue and Butler Avenue (REC-2) 25 feet to the south and west, in addition to the on-site school facilities (REC-3) approximately 25 feet from construction activities.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 PM and 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. The construction activities associated with the Project

49 FHWA, *Construction Noise Handbook*, August 2006, https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/, accessed August 2018.

would comply with these LAMC requirements. In addition, pursuant to the City Noise Ordinance (LAMC Section 112.05), construction noise levels are exempt from the 75 dB(A) noise threshold if all technically feasible noise attenuation measures are implemented. The estimated construction-related noise levels associated with the Project would exceed the numerical noise threshold of 75 dB(A) at 50 feet from the noise source as outlined in the City Noise Ordinance, and the typical construction noise levels associated with the Project would exceed the existing ambient noise levels at the identified off-site sensitive receptors by more than the 5 dB(A) threshold established by the *L.A. CEQA Thresholds Guide* during all construction phases.

Over the course of a construction day, the highest noise levels would be generated when multiple pieces of construction equipment are operated concurrently. The Project's estimated construction noise levels were calculated for a scenario in which a reasonably number of construction equipment was assumed to be operating simultaneously, given the physical size of the site and logistical limitations, and with the noisiest equipment located at the construction area nearest to the affected receptors to present a conservative impact analysis. This is considered a considered a worst-case evaluation because the Project would typically use fewer overall equipment simultaneously at any given time, and as such would likely generate lower noise levels than reported herein. The estimated noise levels at the off-site sensitive receptors were calculated using the FHWA's Roadway Construction Noise Model. **Table 5.12-3: Estimated Construction Noise Levels**, shows the estimated construction noise levels that would occur at the sensitive uses during a peak day of construction activity at the Project Site. As shown in **Table 5.12-3**, impacts for REC-1, REC-2 and REC-3 would be potentially significant. However, implementation of the following measures identified in mitigation measure **MM NOI-1** would reduce the noise levels associated with construction of the Project to the maximum extent that is technically feasible. This measure would prevent as much exposure as possible to nearby sensitive receptors by increasing distance to each receptor when feasible, less operating time of construction equipment and reduced sound by using noise barriers. Construction noise typically diminishes at a rate of 6 dBA over hard surfaces, such as asphalt, and 7.5 dBA over soft surfaces, such as vegetation, for each doubling of distance. Barriers, such as walls and berms, can also reduce sound levels up to 20 dBA.[50] As such, construction noise levels would be exempt from the 75 dB(A) noise threshold, and impacts would be less than significant with mitigation.

50 Caltrans, *Technical Noise Supplement* (September 2013), pg. 5-4, http://www.dot.ca.gov/hq/env/noise/pub/TeNS_Sept_2013B.pdf, accessed October 2018.

**Table 5.12-3**
**Estimated Construction Noise Levels**

| Sensitive Receptor Location | Location | Distance from Closest Edge of Construction Activity to Noise Receptor (feet)[a] | Spec 721.560 Lmax (dBA slow) | Actual Noise Levels (dBA Leq) | Significance Threshold[b] | Exceeds Significance Threshold? |
|---|---|---|---|---|---|---|
| REC-1 | To the east along Sawtelle Boulevard | 50 | 90 | 85 | 68.1 | Yes |
| REC-2 | To the south and west along Westminster Avenue and Butler Avenue | 25 | 96 | 91 | 55.4 | Yes |
| REC-3 | Within the Project Site | 25 | 96 | 91 | 55.4 | Yes |

*Note: Refer to **Appendix B** for construction noise worksheets.*

*[a] The distance represents the nearest construction area on the phased development to the sensitive receptor.*

*[b] The significance threshold is the daytime ambient equivalent noise levels (Leq) plus 5 dBA*

Construction of the Project would require haul and vendor truck trips to and from the site to export soil and delivery supplies to the site. Trucks traveling to and from the Project Site would be required to travel along a haul route approved by the City. Approximately one to two haul truck trips would occur per hour during a work day. Haul truck traffic would take the most direct route to the appropriate freeway ramp. Therefore, the anticipate haul route for the Project would include traveling south on Sawtelle Boulevard, then east on Venice Boulevard towards the I-405 Freeway onramp, which is approximately 0.4 miles away from the Project Site.

Noise associated with construction truck trips were estimated using the FHWA Traffic Noise Model. The peak average daily worker trips, which occurs during Phase 2, for all construction phases would be 500 trips which occurs during grading. The results of the analysis indicate that the Project truck trips during this phase would generate noise levels of approximately 52.7 dBA, measured at a distance of 50 feet along Sawtelle Boulevard. Added with the existing ambient noise level along Sawtelle Boulevard, which measured at 68.1 dBA, the total accumulated noise would be 68.2. Therefore, the increase with

construction truck trips would be below the significance threshold of an increase of 5 dBA from ambient. As such, impacts related to construction truck trips would be less than significant.

## Operation

### *Roadway Noise*

In order for a new noise source to be audible, there would need to be a 3 dB(A) or greater CNEL noise increase. The traffic volume on any given roadway segment would need to double during peak hours in order for a 3 dB(A) increase in ambient noise to occur. According to the *L.A. CEQA Thresholds Guide*, if a project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant. As shown in **Section 5.16: Transportation and Traffic**, the Project would not result in doubling the existing traffic counts on any of the analyzed intersections. As such, impacts would be less than significant.

### *Parking Noise*

Development of the Project would introduce parking lots associated with the new school facilities on the Project Site. Generally, noise associated with parking lots is not of sufficient volume to exceed community noise standards based on the time-weighted CNEL scale. Parking lots can be a source of annoyance due to automobile engine start-ups and acceleration, and the activation of car alarms. Parking lots can generate Leq noise levels of between 49 dBA Leq (tire squeals) to 74 dBA Leq (car alarms) at 50 feet. Vehicle access to the Project Site includes the entrance/exit on Palms Boulevard on the north side and an Sawtelle Boulevard from the south side of the Project Site. The Project includes two surface parking lots for these locations of the Project along with a reconfiguration of the existing surface parking lot for the north by maximizing the circulation efficiency due to a consolidated single driveway and reduce the total amount of parking spaces. As there are current use of existing parking lots, any increase in noise associated with the reconfigured parking lot would be negligible. In addition, due to the existing level of traffic noise along area roadways, noise would not likely be audible due to the additional masking of noise by traffic. As such, impacts would be considered less than significant.

### *Stationary Noise*

New stationary sources of noise—heating, air conditioning, and ventilation (HVAC) equipment—would be installed in the proposed buildings at the Project Site. The design of this equipment would be required to comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Because the noise levels generated by the HVAC equipment serving the Project would not be allowed to exceed the ambient noise level by 5 dB on the premises of

the adjacent properties, a substantial permanent increase in noise levels would not occur at the nearby sensitive receptors. Impacts would be less than significant.

***Mitigation Measures:*** The incorporation of the following mitigation measure into the Project would reduce construction noise impacts to a less than significant level.

**MM NOI-1** Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously on the Project Site, which causes high noise levels (i.e., demolition activities would occur during summer when school is not fully operational).
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, must be turned off when not in use for more than 30 minutes.
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible.
- Stationary construction equipment, such as pumps, generators, or compressors, must be placed as far from noise sensitive uses as feasible during all phases of project construction.
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources.

### *b. Would the project result in exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?*

**Less than Significant Impact.** Vibration is sound radiated through the ground. Vibration can result from a source (e.g., subway operations, vehicles, machinery equipment, etc.) causing the adjacent ground to move, thereby creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as ground-borne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is

the approximate dividing line between barely perceptible and distinctly perceptible levels for most people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

### Construction

Construction activities have the potential to generate low levels of ground-borne vibration. The operation of construction equipment generates vibrations that propagate through the ground but diminishes in intensity with distance from the source. Vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage of buildings at the highest levels.

In terms of construction-related impacts on buildings, the City of Los Angeles has not adopted policies or guidelines relative to ground-borne vibration. While the Los Angeles County Code (LACC Section 12.08.350) provides a presumed perception threshold of 0.01 inch per second RMS, this threshold applies to ground-borne vibrations from long-term operational activities, not construction. Consequently, as both the City of Los Angeles and the County of Los Angeles do not have a significant threshold to assess vibration impacts during construction, the Federal Transit Administration (FTA) and California Department of Transportation's ("Caltrans") adopted vibration standards for buildings are used to evaluate potential impacts related to project construction. Based on the FTA and Caltrans criteria, construction impacts relative to ground-borne vibration would be considered significant if the following were to occur:[51]

- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.5 inches per second (ips) at any building that is constructed with reinforced concrete, steel, or timber.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.3 ips at any engineered concrete and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.2 ips at any nonengineered timber and masonry buildings.
- Project construction activities would cause a PPV ground-borne vibration level to exceed 0.12 ips at any historical building or building that is extremely susceptible to vibration damage.

51 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment* (May 2006); and California Department of Transportation, *Transportation- and Construction-Induced Vibration Guidance Manual* (June 2004).

In addition, the City of Los Angeles has not adopted any thresholds associated with human annoyance for ground-borne vibration impacts. Therefore, this analysis uses the FTA's vibration impact thresholds for human annoyance. These thresholds include 0.2 ips at residences and buildings where people normally sleep (e.g., nearby residences).[52] No thresholds have been adopted or recommended for commercial and office uses.

As shown in **Table 5.12-4: Estimated Vibration Levels**, construction- generated vibration levels experienced at the identified sensitive receptors. In terms of human annoyance resulting from vibration generated during construction, the single- and multifamily residential uses located to the east, south, and west of the Project Site could be exposed to increased vibration levels. However, as shown in **Table 5.12-4**, operation of the construction equipment would not exceed the 0.2 ips threshold for any of the nearby sensitive receptors. As such, impacts would be less than significant.

**Table 5.12-4**
**Estimated Vibration Levels**

| | Inches per Second PPV at Adjusted Distances | | |
|---|---|---|---|
| | **REC-1** | **REC-2** | **REC-3** |
| **Equipment** | **50 feet** | **25 feet** | **25 feet** |
| Air compressors | 0.032 | 0.090 | 0.090 |
| Backhoes | 0.028 | 0.080 | 0.080 |
| Concrete/Industrial saws | 0.006 | 0.018 | 0.018 |
| Dozers | 0.025 | 0.071 | 0.071 |
| Forklift | 0.014 | 0.040 | 0.040 |
| Graders | 0.025 | 0.071 | 0.071 |

*Source: Office of Planning and Environment, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, FTA-VA-90-1003-06 (May 2006), 12-9.*

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

**Less than Significant Impact.** A significant impact could occur if the Project were to result in a substantial permanent increase in ambient noise levels above existing ambient noise levels without the Project. As defined in the *L.A. CEQA Thresholds Guide* threshold for operational noise impacts, a project would

52 Caltrans, *Transportation and Construction Vibration Guidance Manual*, September 2013, http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf

normally have a significant impact on noise levels from project operations if the project causes the ambient noise level measured at the property line of affected uses that are shown in **Table 5.12-5: Community Noise Exposure (CNEL)**, to increase by 3 dB(A) in CNEL to or within the "normally unacceptable" or "clearly unacceptable" category, or any 5 dB(A) or greater noise increase. Thus, a significant impact would occur if noise levels associated with operation of the Project would increase the ambient noise levels by 3 dB(A) CNEL at homes where the resulting noise level would be at least 70 dB(A) CNEL. In addition, any long-term increase of 5 dB(A) CNEL or more is considered to cause a significant impact.

**Table 5.12-5**
**Community Noise Exposure (CNEL)**

| Land Use | Normally Acceptable[a] | Conditionally Acceptable[b] | Normally Unacceptable[c] | Clearly Unacceptable[d] |
|---|---|---|---|---|
| Single-family, duplex, mobile homes | 50–60 | 55–70 | 70–75 | above 75 |
| Multifamily homes | 50–65 | 60–70 | 70–75 | above 75 |
| Schools, libraries, churches, hospitals, nursing homes | 50–70 | 60–70 | 70–80 | above 80 |
| Transient lodging—motels, hotels | 50–65 | 60–70 | 70–80 | above 75 |
| Auditoriums, concert halls, amphitheaters | --- | 50–70 | --- | above 70 |
| Sports arena, outdoor spectator sports | --- | 50–75 | --- | above 75 |
| Playgrounds, neighborhood parks | 50–70 | --- | 67–75 | above 75 |
| Golf courses, riding stables, water recreation, cemeteries | 50–75 | --- | 70–80 | above 80 |
| Office buildings, business, and professional Commercial | 50–70 | 67–77 | above 75 | --- |
| Industrial, manufacturing, utilities, agriculture | 50–75 | 70–80 | above 75 | --- |

*Source:* Office of Planning and Research, *State of California General Plan Guidelines* (in coordination with the California Department of Health Services) (October 2003; City of Los Angeles, *General Plan, "*Noise Element" (adopted February 1999).

[a] Normally Acceptable: Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[b] 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 are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

[c] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and necessary noise insulation features included in the design.

[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

As discussed in **Threshold 5.12-1**, operational noise would not exceed any threshold. Roadway traffic would not be doubled from existing conditions and therefore, would not result in an increase of 3 dBA. In addition, the parking lots would not pose any significant impacts compared to existing conditions. Furthermore, the design of any stationary equipment would be required to comply with Section 112.02 of the LAMC, therefore not exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

**Less than Significant with Project Mitigation.** The Project does not involve uses that are sources of substantial increases in periodic noise. Noise emitted by the Project during the daytime would include but not be limited to roadway traffic to and from school, school bells, HVAC systems, doors opening and closing in the parking lot and classrooms, and student activities. Noise generated from the Project from after school events would include but not be limited to the traffic of crowds going to and from the event, music from concerts, or by athletic events. As discussed above, substantial temporary increases in ambient noise levels are likely during construction, however Mitigation Measure **MM NOI-1**, would ensure impacts from construction-related noise would remain less than significant.

***Mitigation Measures:*** Mitigation measure **MM NOI-1**, identified above, would reduce potential construction noise impacts to a less than significant level.

### *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 expose people residing or working in the project area to excessive noise levels?*

**Less than Significant Impact.** A significant impact may occur if a project were to be located within an airport land use plan and would introduce substantial new sources of noise or substantially add to existing sources of noise within or near a Project Site. The Federal Aviation Administration (FAA) requires airports to prepare noise contour maps to assess the effects of aircraft noise to surrounding land uses. These maps can be used as an indicator of potential impacts. The closest airport to the proposed Project is the Santa Monica Municipal Airport, approximately 0.8 miles to the west. However, the Santa Monica Municipal Airport noise contours remain confined within the runway and the adjacent properties of the airport and

not within the proposed Project vicinity.[53] Therefore, the Project would not expose people to excessive noise levels associated with airport uses. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

**No Impact.** The proposed Project is not near a private airstrip. Accordingly, the proposed Project would not expose people working or residing in the Project area to excessive noise levels from a private airstrip. Therefore, no impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

53 City of Santa Monica, Calendar Year 2017 CNEL Contours Santa Monica Municipal Airport (May 2018), https://www.smgov.net/uploadedFiles/Departments/Airport/Noise_Mitigation/2017%20CNEL%20Noise%20Contours.pdf.

# 5.13 POPULATION AND HOUSING

## Impact Analysis

### *a. Would the project induce substantial 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.** A significant impact could occur if a project would locate new development, such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Implementation of the Project involves improvements to an existing school campus and an increase in student enrollment. The Project would not result in the development of new homes, businesses, roads, or other infrastructure within an undeveloped area. The small increase of 35 students would also not result in substantial increase in population beyond that anticipated by the regional forecasts or the City's adopted General Plan. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

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

**Less than Significant Impact.** The Project would involve the demolition of an existing 20-unit apartment building on the Project Site that is owned by the Windward School. This residential building is currently vacant and does not contain any residents. While the demolition of these units would displacement existing housing, the removal of these 20 vacant units is considered marginal. The Palms-Mar Vista-Del Rey Community Plan had an estimated housing stock of 52,586 dwelling units in 2014.[54] Thus, the 20 units would represent approximately 0.04 percent of the total housing units within the Community Plan area. Thus, the Project would not result in the displacement of a substantial number of existing housing units and would therefore not necessitate the construction of replacement housing. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

**No Impact.** As noted above, the Project would involve the demolition of an existing 20-unit apartment building that is owned by the Windward School. As the building is currently vacant, it is not occupied by

54 Los Angeles Department of City Planning, American Community Survey (ACS)2010-2014. (August 29, 2016).

any residents. Thus, the Project would not result in the displacement of any existing occupied housing units, or people, and would therefore not necessitate the construction of replacement housing. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.14 PUBLIC SERVICES

## Impact Analysis

***a. 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:***

***i. Fire Protection***

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between land uses and a LAFD fire station that houses an engine or truck company is 1.5 miles; for a residential land uses, the distance is 1-1.5 miles for an engine company and 2 miles for a truck company. If either of these distances is exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems.

The Project could potentially increase the demand for LAFD services. The Project Site is served by LAFD Station No. 62, located at 11970 Venice Boulevard southwest of the site, is approximately a 1.2-mile driving distance from the Project site.[55] Based on the response distance criteria specified in LAMC 57.507.3.3 and the relatively short distance from Fire Station No. 62 to the Project site, fire protection response is considered adequate. As such, no new or expanded fire stations or other facilities would need to be constructed to serve the project. Impacts would be less than significant.

The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire-flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (psi) is to remain in the water system while the required gpm is flowing. The existing fire hydrants located along Palms Boulevard and Sawtelle Boulevard, and the on-site sprinkler system, are adequate for the fire flow needs for the Project; no new public fire hydrant installations are anticipated.

55 Los Angeles Fire Department, Station 62, accessed September 2018, https://www.lafd.org/fire-stations/station-62.

However, the Applicant would be required to coordinate with the City and LAFD and provide for the design, number, and the installation of fire hydrants, as well as the provision of adequate emergency access (during construction and operation), including ingress and egress point, for emergency services. Therefore, implementation of the Project would not result in a substantial change in conditions that would increase demand for fire protection services or inhibit the ability of the LAFD to provide adequate response to the Project Site. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *ii. Police Protection*

**Less than Significant Impact.** For the purpose of this Initial Study, a significant impact could occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project without necessitating a new or physically altered station, the construction of which may cause significant environmental impacts. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the project, based on the net increase of residential units or square footage of nonresidential floor area; (b) the demand for police services anticipated at the time of completion and occupancy of the Project compared to the expected level of service available, considering, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project site is located in the Pacific Community of the LAPD's West Bureau.[56] The Pacific Community Police Station is located at 12312 Culver Boulevard, approximately a 2.3-mile driving distance from the Project site. Within the Pacific Community area, the Project is located within Reporting District (RD) 1425 and 1435.[57]

Implementation of the Project involves phased improvements to an existing school campus and an increase in student enrollment. These proposed changes would not result in a substantial change in the provision of police protection, given the Project Site is currently served by LAPD and the Project would not result in a substantial change in the existing use of the Project Site. While a majority of the Project Site is currently secured, the Project would incorporate any necessary fencing around the portions of the Project Site undergoing construction to minimize trespassing and vandalism. With regards to safety and

56 Los Angeles Police Department, *West LA Community Police Station*, accessed September 2018, http://lapdonline.org/west_la_community_police_station,

57 Los Angeles, *GeoHub*, "LAPD Reporting Districts," accessed July 2018, http://geohub.lacity.org/datasets/4398360b1a0242b78904f46b3786ae73_0.

reduction of theft during operation of the Project, other security features, such as fencing, surveillance cameras, and security lighting, would be incorporated within the proposed improvements to reduce additional demand on LAPD. Therefore, the Project would not result in a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. The overall need for police protection services would not increase substantially as a result of the project. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *iii. Schools*

**Less Than Significant Impact.** A significant impact may occur if a project were to include substantial employment or population growth, which could generate a demand for school facilities that would exceed the capacity of the Los Angeles Unified School District (LAUSD).

Since the Project does not involve the construction of any residential uses or an increase in the City's population, implementation of the Project would not require the construction of new school facilities outside the Windward School campus. The Project involves an increase in student enrollment by 35 students, from 550 to 585 students, and additional 40 student increase to a maximum of 625 students by 2022. However, this increase in students on the Windward School campus would not affect the capacities of other LAUSD facilities. As the Project would not result in an increased demand for school services, the need for new school facilities would not be required. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *iv. Parks*

**Less than Significant Impact.** Based on the *L.A. CEQA Thresholds Guide*, a significant impact could occur if the Project resulted in the construction of new recreation and park facilities that creates significant direct or indirect impacts to the environment. The Project does not involve the construction of residential uses and would therefore not result in any increase in population that would require construction of new or expanded parks or recreational facilities within the City. In addition, the Project Site is within a highly urbanized area of the Palms-Mar Vista-Del Rey Community Plan neighborhood and has access to numerous parks and public recreation facilities within a 2-mile radius. The existing athletic fields and outdoor recreation facilities on the Project Site would continue to be available for students during construction and operation of the Project. Therefore, the Project would not require alternative recreational areas for students. Demand for parks and recreational services within the City would remain the same. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *v. Other Public Facilities*

**Less than Significant Impact.** A significant impact could occur if a project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries) that would exceed the capacity available to serve the Project Site. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether the project results in a significant impact on libraries shall be made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for library services anticipated at the time of completion and occupancy of the Project compared to the expected level of service available, considering, as applicable, scheduled improvements to existing library services (renovation, expansion, addition, or relocation) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct financial support to the Los Angeles Public Library [LAPL]).

Within the City of Los Angeles, the LAPL provides library services at the Central Library, seven regional branch libraries, 56 community branches, and bookmobile units. Approximately 6.5 million books and other materials compose the LAPL collection. The LAPL branches currently serving the Project Site include the Mar Vista Branch Library, located at 12006 Venice Boulevard, approximately 0.7 miles south of the Project site. The Project does not involve the construction of residential uses and would therefore not result in any increase in population. Therefore, as implementation of the Project would not generate population or employment growth, the Project would not require the construction of new LAPL branches or facilities to serve the surrounding community with the Project. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.15 RECREATION

## Impact Analysis

### *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?*

**Less than Significant Impact.** A significant impact could occur if a project were to include substantial employment or population growth, which would 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. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on recreation and parks shall be made considering the following factors: (a) the net population increase resulting from the Project; (b) the demand for recreation and park services anticipated at the time of Project build-out compared to the expected level of service available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the Project's proportional contribution to the demand; and (c) whether the Project includes features that would reduce the demand for park services (e.g., on-site recreation facilities, land dedication, or direct financial support to the Department of Recreation and Parks).

Implementation of the Project involves phased improvements to an existing school campus and an increase in student enrollment by 35 students, from 550 to 585 students, and additional 40 student increase to a maximum of 625 students by 2022. The Project would not generate an increase in population and the students would continue to utilize the existing athletic and outdoor facilities on the Project Site. Therefore, demand for recreational services within the City would remain the same, and deterioration to recreational facilities would not occur. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *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 Impact.** A significant impact could occur if a project were to include or require the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. The Project includes various landscaping and other associated outdoor improvements, including the implementation of the student gathering plaza. These proposed improvements would occur within the Project Site. As such, the Project does not include recreational facilities or require the construction or expansion of such facilities. Impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

## 5.16 TRANSPORTATION AND TRAFFIC

The following section summarizes and incorporates by reference information from the *Traffic Impact Analysis Report, Proposed Windward School Master Plan Update,* dated May 2018 (Traffic Study) prepared by Hirsch/Green Transportation Consulting for the Applicant and the review memorandum dated October 9, 2018 by LADOT, as contained in **Appendix D of this Initial Study**.

***a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?***

**Less than Significant Impact.** A significant impact could occur if the Project were to result in substantial increases in traffic volumes in the vicinity of the Project such that the existing street capacity experiences a decrease in the existing V/C ratios or experiences increased traffic congestion exceeding the City of Los Angeles Department of Transportation 's (LADOT's) recommended level of service (LOS), which describes the quality of traffic flow.

### Operational Traffic

Five study intersections were identified, in coordination with LADOT staff, for inclusion in the traffic analysis. The analyzed locations are shown in the Traffic Study and correspond to locations where potential traffic impacts from the Project are most likely to occur. The intersections identified for analysis are as follows:

1. Sawtelle Boulevard/National Boulevard
2. McLaughlin Avenue/Palms Boulevard
3. Sawtelle Boulevard/Palms Boulevard
4. Sepulveda Boulevard/ Palms Boulevard
5. Sawtelle Boulevard/Venice Boulevard

### Estimated Trip Generation

Trip generation estimates for the Project were reviewed and approved by LADOT and were calculated using trip generation rates contained in the Institute of Transportation Engineers' *Trip Generation Manual*. **Table 5.16-1: Trip Generation Estimates,** summarizes the trip generation estimates for the daily AM peak-hour and PM peak-hour periods, respectively. In order to provide a better representation trip estimate for the Project, the Traffic Study utilized an average of the three trip rates to identify the best applicable

trip generation for estimating the School's daily traffic based on a mixed middle school, high school, and private school. Based on these assumptions and methodologies, the number of trips associated with both the prior 35-student enrollment increase and the future 40-student enrollment increase requested as part of the proposed Master Plan Update Project were estimated. As shown in **Table 5.16-1**, the Project would generate a net decrease of 130 weekday trips, 4 morning peak-hour trips and 7 afternoon peak-hour trips.

## Project Impacts

### *Existing with Project Impacts*

Project traffic was added to the surrounding existing traffic conditions, and the potential for impacts was evaluated. **Table 5.16-2: Existing with Project Conditions—Intersection Level of Service, AM/PM Peak Hours,** summarizes the level of service for the existing with Project conditions at the analyzed intersections for the AM and PM peak hours, respectively. Based on the City's guidelines, an impact could be significant if one of the following scenarios would occur: at an intersection with Level of Service C if the volume-to-capacity (V/C) ratio increased by .04 or greater; at an intersection with Level of Service D if the volume-to-capacity (V/C) ratio increased by .02 or greater; or at an intersection with Level of Service E or F if the volume-to-capacity (V/C) ratio increased by .01 or greater. The analysis summarized in **Table-5.16-2** indicates that for the AM/PM peak hour, the addition of Project traffic would not cause an increase in V/C ratios above the threshold. Therefore, it is concluded that the Project would not cause any significant traffic impacts compared to existing conditions in either the AM or PM peak hours.

### *Future with Project Impacts*

**Table 5.16-3: Future without and with Project Conditions—Intersection Level of Service, AM/PM Peak Hours,** summarizes the results of the future with Project conditions intersections analysis during the weekday morning and afternoon peak hours. The future with Project conditions were compared to the future without Project conditions to assess the impacts of the Project as compared to the future environment without of the Project. In addition, potential net increases in average daily vehicle trips and peak-hour vehicle trips from the related projects were taken into consideration. Based on the City's significance criteria, the change in traffic flow generated by the Project when compared to conditions without the Project, is not anticipated to result in a significant impact at any of the study intersections under future conditions.

**Table 5.16-1**
**Trip Generation Estimates**

| | | | | AM Peak-Hour Trips | | | PM Peak-Hour Trips | | |
|---|---|---|---|---|---|---|---|---|---|
| **Land Use (ITE Code)** | **Size** | **Units** | **Daily** | **In** | **Out** | **Total** | **In** | **Out** | **Total** |
| **Project** | | | | | | | | | |
| Master Plan | 40 | Students | 130 | 22 | 18 | 40 | 11 | 15 | 26 |
| **Existing** | | | | | | | | | |
| Existing Overage | (35) | Students | (114) | (19) | (16) | (35) | (10) | (13) | (23) |
| Apartments | (20) | Units | (146) | (2) | (7) | (9) | (6) | (4) | (10) |
| Net Change | | | (130) | 1 | (5) | (4) | (5) | (2) | (7) |

*Source: Traffic Impact Analysis Report, Proposed Windward School Master Plan Update, May 2018.*

**Table 5.16-2**
**Existing with Project Conditions—Intersection Level of Service, AM/PM Peak Hours**

| No. | Intersection | Peak Hour | Existing without Master Plan Update Project | | Existing with Master Plan Update Project | | Change in V/C | Significant Impact? |
|---|---|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS | | |
| 1 | Sawtelle Boulevard/National Boulevard | AM | 0.725 | C | 0.726 | C | 0.001 | No |
| | | PM | 0.752 | C | 0.753 | C | 0.001 | No |
| 2 | McLaughlin Avenue/Palms Boulevard | AM | 0.829 | D | 0.833 | D | 0.004 | No |
| | | PM | 0.769 | C | 0.772 | C | 0.003 | No |
| 3 | Sawtelle Boulevard/Palms Boulevard t | AM | 0.723 | C | 0.726 | C | 0.003 | No |
| | | PM | 0.666 | B | 0.669 | B | 0.003 | No |
| 4 | Sepulveda Boulevard/ Palms Boulevard | AM | 0.643 | B | 0.645 | B | 0.002 | No |
| | | PM | 0.855 | D | 0.856 | D | 0.001 | No |
| 5 | Sawtelle Boulevard/Venice Boulevard | AM | 0.873 | D | 0.876 | D | 0.003 | No |
| | | PM | 0.760 | C | 0.762 | C | 0.002 | No |

*Source: Traffic Impact Analysis Report, Proposed Windward School Master Plan Update, May 2018.*

**Table 5.16-3**
**Future without and with Project Conditions—Intersection Level of Service, AM/PM Peak Hours**

| No. | Intersection | Peak Hour | Future without Master Plan Update Project | | Future with Master Plan Update Project | | Change in V/C | Significant Impact? |
|---|---|---|---|---|---|---|---|---|
| | | | V/C | LOS | V/C | LOS | | |
| 1 | Sawtelle Boulevard/National Boulevard | AM | 0.809 | D | 0.809 | D | 0.000 | No |
| | | PM | 0.844 | D | 0.845 | D | 0.001 | No |
| 2 | McLaughlin Avenue/Palms Boulevard | AM | 0.897 | D | 0.901 | E | 0.004 | No |
| | | PM | 0.832 | D | 0.835 | D | 0.003 | No |
| 3 | Sawtelle Boulevard/Palms Boulevard t | AM | 0.789 | C | 0.793 | C | 0.004 | No |
| | | PM | 0.743 | C | 0.745 | C | 0.002 | No |
| 4 | Sepulveda Boulevard/ Palms Boulevard | AM | 0.697 | B | 0.699 | B | 0.002 | No |
| | | PM | 0.925 | E | 0.926 | E | 0.001 | No |
| 5 | Sawtelle Boulevard/Venice Boulevard | AM | 0.972 | E | 0.975 | E | 0.003 | No |
| | | PM | 0.853 | D | 0.854 | D | 0.001 | No |

*Source: Traffic Impact Analysis Report, Proposed Windward School Master Plan Update, May 2018.*

### *Congestion Management Plan Analysis*

The Los Angeles County Congestion Management Plan (CMP) requires that when a Traffic Impact Assessment (TIA) is prepared for a project, traffic and transit impact analyses be conducted for select regional facilities based on the amount of project traffic expected to use these facilities.

### *CMP Significant Traffic Impact Criteria*

The *CMP Guidelines* state that a CMP freeway analysis must be conducted if 150 or more trips attributable to the proposed Project are added to a mainline freeway-monitoring location in either direction during the morning or afternoon weekday peak hours. Similarly, a CMP arterial monitoring station analysis must be conducted if 50 or more peak-hour project trips are added to a CMP arterial monitoring station during the morning or afternoon weekday peak hours of adjacent street traffic.

A significant project-related CMP impact would be identified if the CMP facility is projected to operate at LOS F (V/C > 1.00) and if the project traffic causes an incremental change in the V/C ratio of 0.02 or greater. The proposed Project would not be considered to have a regionally significant impact, regardless of the

increase in V/C ratio, if the analyzed facility is projected to operate at LOS E or better after the addition of the project traffic.

There are two CMP intersection-monitoring locations within a two-mile radius of the Project Site:

- Venice Boulevard and Centinela Avenue.
- Venice Boulevard and Overland Avenue

Based on the trip distribution analysis in the Traffic Study, the Project would not contribute 50 or more new trips at these intersections during the morning or afternoon weekday peak hours.

In addition, the CMP requires a detailed analysis of potential project-related impacts to freeway mainline segments where a project could be anticipated to add 150 or more vehicles in either direction during either peak hour on the freeway. However, as identified in the Traffic Study, both the Master Plan Update Project and previous 35-student increase individually, as well as the combination of these two components, will result in substantially fewer than 150 net directional trips during both peak hours. Thus, no further review of the Project's potential impacts to CMP freeway-monitoring locations is required. Impacts would be less than significant.

### LADOT/Caltrans Freeway Mainline Analysis

The joint LADOT/Caltrans freeway mainline impact analysis screening procedures identify that detailed analyses of potential project-related impacts to such facilities must be prepared for any project that results in an incremental increase in peak hour freeway mainline traffic equal to or exceeding one percent of the design capacity of a subject freeway segment if it currently operates or is forecast to operate at LOS E or LOS F, or an incremental increase in freeway mainline traffic of two percent of the design capacity for freeway segments that currently or are anticipated to exhibit LOS D conditions. As shown in the Traffic Study, there are no significant (individual or cumulative) impacts to any of the subject freeway mainline or off-ramps expected. Impacts would be less than significant.

### Regional Transit Impact Analysis

An analysis of potential Project impacts on the transit system was also performed, per the CMP requirements and guidelines. The CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. This methodology assumes an average vehicle occupancy (AVO) factor of 1.4 to estimate the number of person-trips to and from the Project.

The CMP guidelines estimate that approximately 10 percent of total project person-trips may use public transit to travel to and from the site if the site is within 0.25 miles of a CMP transit center. The Project Site is currently served by a total of three bus lines within a 0.25-mile radius. The Traffic Study showed that the empirical trip generation and parking demand surveys conducted at the existing campus indicate that few students or staff currently utilize public transit as their regular mode of travel to or from the Project Site. It was conservatively assumed that up to five percent of both the future maximum of 625 students and the approximately 137 regular faculty and staff at the would choose to use public transit. Using this assumption, it is possible that up to a 31 of the 625 students and about seven of the total of 137 regular faculty and staff personnel could utilize the available public transportation services to travel to and from the Windward School campus.

As stated above, the Project location is served by numerous established transit routes. A review of the schedules of the lines serving the area (Culver City Bus Lines 6 and Rapid 6, and Santa Monica Big Blue Bus Line 17) shows a total of 24 stops during the AM peak and 21 stops during the PM peak.[58] Project-related increases in ridership on any single bus along any of the three transit lines currently serving the Windward School site are expected to be nominal, with only about one or two additional School-related riders on each bus during either peak hour. Thus, based on the calculated number of generated transit trips, impacts to the existing or future regional transit system in the vicinity of the Project Site are not anticipated to be significant.

### *Construction—Traffic*

The Project would require the use of haul trucks during grading and the use of a variety of other construction vehicles throughout the construction of the Project. The anticipate haul route for the Project would include traveling south on Sawtelle Boulevard, then east on Venice Boulevard towards the I-405 Freeway onramp, which is approximately 0.4 miles away from the Project Site. It is expected that LADOT would indicate a condition of approval, as part of the Project's haul route permit, that haul trips may only occur outside of the peak hours. As stated above in **Table 5.16-1**, the operation of the Project is not expected to generate more than 130 additional trips per day. The Project's peak construction trip traffic is estimated at approximately 500 trips per day during grading of Phase 2, the peak construction phase of the Project.[59] Therefore, it is not anticipated that the construction trips would contribute to a significant increase in the overall congestion in the Project vicinity. In addition, any truck trips would be limited to the length of time required for the Project's construction. Impacts would less than significant.

58 Hirsch/Green Transportation Consulting, Inc, *Traffic Impact Analysis Report, Proposed Windward School Master Plan Update, May 2018*.

59 Derived from construction worker and vendor trip rates contained in *California Emissions Estimator Users Guide,* Appendix E, "Technical Source Documentation," California Air Pollution Control Officers Association (October 2017).

***Mitigation Measures:*** No mitigation measures are necessary.

### *b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

**Less than Significant Impact.** As discussed previously in **Section 5.16a**, the CMP freeway-monitoring segment and intersection analysis showed no Project-related impacts to the CMP. The Project would not conflict with any travel demand measures. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

**No Impact.** This question would apply to the Project only if it involved an aviation-related use or would influence changes to existing flight paths. No aviation-related use or changes to existing flight paths, would occur. No impacts would occur.

***Mitigation Measures:*** No mitigation measures are necessary.

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

**Less than Significant Impact.** A significant impact could occur if a project were to include new roadway design or introduce a new land use or features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if access or other features were designed in such a way as to create hazardous conditions. The Project would continue to use the vehicle access and parking lots from the existing campus from Palms Boulevard and Sawtelle Boulevard for the northern and southern portion of the Project Site respectively. The northern portion of the Project Site would be reconfigured to have a better design efficiency. As such, no significant traffic-related impacts are anticipated as a result of the proposed Project. In addition, the Project's Transportation Demand Management Plan (TDM) Plan would offset any potential traffic increases resulting from the requested 40-student enrollment increase during both the AM and PM peak periods. The TDM Plan would provide sufficient on-site vehicular parking to fully accommodate its existing and anticipated future parking demands by reducing or eliminating existing staff and student-related parking along adjacent streets. Therefore, impacts would less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *e. Would the project result in inadequate emergency access?*

**Less than Significant Impact.** A significant impact could occur if the Project design were to not provide emergency access meeting the requirements of the LAFD, or in any other way were to threaten the ability of emergency vehicles to access and serve the Project Site or adjacent uses. Development of the Project Site may require temporary and/or partial street and sidewalk closures due to construction activities. Any such closures would be temporary in nature and would be coordinated with the City of Los Angeles Departments of Transportation, Building and Safety, and Public Works. Such closures would not be expected to interfere with emergency response or evacuation plans. As described previously, the Project would satisfy the emergency response requirements of the LAFD. No hazardous design features are included in the access design or site plan for the Project that could impede emergency access. Furthermore, the Project would be subject to the site plan review requirements of both the LAFD and the LAPD to ensure that all access roads, driveways, and parking areas would remain accessible to emergency service vehicles. The Project would not be expected to result in inadequate emergency access. Impacts would less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

**Less than Significant Impact.** For the purpose of this Initial Study, a significant impact could occur if a project were to conflict with adopted polices or involve modification of existing alternative transportation facilities on or off site. The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Furthermore, the Project would not interfere with any Class I or Class II bikeway systems. In addition, the Project's TDM Plan would offset any potential traffic increases resulting from the requested 40-student enrollment increase during both the AM and PM peak periods. The TDM Plan for the new campus would provide sufficient on-site vehicular parking to fully accommodate its existing and anticipated future parking demands by reducing or eliminating existing staff and student-related parking along adjacent streets. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

## 5.17 TRIBAL CULTURAL RESOURCES

***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)***

**Less than Significant Impact.** As described in section **5.5a, Cultural Resources**, above, the Project Site does not contain any features that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources; nor would the Project adversely affect any nearby resources that are listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources. Therefore, potential impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***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 with Project Mitigation.** Public Resources Code, Section 21080.3.1, establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Section 20174 of the Public Resources Code. In compliance with the Code, on January 28, 2019, the City sent notices to Native American tribes that are known to be traditionally and culturally affiliated with the Project area and have requested to be notified of projects. A response was received from the Gabrieleno Band of Mission Indians Kizh Nation and the City subsequently consulted with the Tribe regarding the potential to unearth subsurface artifacts during construction. The City has an established protocol that will be imposed as a condition of approval for handling cultural artifacts unearthed during construction. While no Tribal

Cultural Resources have been identified on the site and there is not specific evidence of subsurface resource on the site, these resources could occur onsite. As such, impacts would be potentially significant.

***Mitigation Measures:*** With the incorporation of the mitigation measure described below, impacts would be reduced to a less than significant level.

**MM-TCR-1** Tribal Cultural Resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

a. Upon a discovery of a potential tribal cultural resource, the project Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1454.

b. If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource, the City shall provide the Gabrieleno Band of Mission Indians - Kizh Nation a reasonable period of time, not less than 7 days or more than 14 days, to conduct a site visit and make recommendations to the Project Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

c. The project Applicant shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

# 5.18 UTILITIES AND SERVICE SYSTEMS

## Impact Analysis

### *a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

**Less than Significant Impact.** A significant impact would occur if a project exceeds wastewater treatment requirements of the applicable RWQCB. Section 13260 of the California Water Code states that persons discharging or proposing to discharge waste that could affect the quality of the waters of the State, other than into a community sewer system, shall file a Report of Waste Discharge (ROWD) containing information that may be required by the appropriate RWQCB. The RWQCB then authorizes an NPDES permit that ensures compliance with wastewater treatment and discharge requirements.

Currently, wastewater from the Project Site is conveyed via municipal sewage infrastructure maintained by the Los Angeles Bureau of Sanitation to the Hyperion Water Reclamation Plant, a public facility subject to the State's wastewater treatment requirements. Wastewater from the Project would continue to be conveyed through City sewage infrastructure to Hyperion Water Reclamation Plant. The Project would generate pollutant loads typical of urban wastewater already processed by the Hyperion Water Reclamation Plant. Furthermore, as discussed below, Hyperion Water Reclamation Plant has the available capacity to accommodate the additional waste associated with the Project. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**Less than Significant Impact.** A significant impact could occur if a project were to increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. Water is provided by the Los Angeles Department of Water and Power (LADWP); the Los Angeles Bureau of Sanitation provides sewer service to the proposed Project area.

LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd). The average plant flow is approximately 362 mgd averaged over calendar year 2013 and

operates at approximately 60 percent capacity. Therefore, the LAAFP has a remaining capacity of approximately 238 mgd, depending on the season.[60]

The Los Angeles Bureau of Sanitation provides sewer service to the Project area. Sewage from the Project Site is conveyed via sewer infrastructure to the Hyperion Water Reclamation Plant. The Hyperion Water Reclamation Plant treats an average daily flow of 275 mgd on a dry weather day and has the capacity to treat 450 mgd and peak wet weather flow of 800 mgd.[61] This equals a remaining capacity of 88 mgd of wastewater able to be treated at the Hyperion Water Reclamation Plant.

The Project Site is in a developed, urbanized portion of Los Angeles that is served by existing water and sewer mains. As shown in **Table 5.18-1: Estimated Water Demand,** below, it is estimated that the Project would have a net daily water reduction of 3,198 gallons or an annual demand of 3.58 acre-feet from existing conditions. Given the remaining capacity of the LAAFP, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities.

As shown in **Table 5.18-2: Estimated Sewage Generation,** below, it is estimated that the Project would generate a net reduction of 2,560 gpd of wastewater. Given the available capacity of the Hyperion Water Reclamation Plant, the Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Impacts on wastewater treatment facilities would be less than significant.

Furthermore, the Applicant shall be required to implement applicable LA Green Building Code requirements that would further reduce water flow. Impacts on water treatment facilities would be less than significant

***Mitigation Measures:*** No mitigation measures are necessary.

60 Los Angeles Department of Water and Power, Urban Water Management Plan (2015)

61 City of Los Angeles, LA Sanitation, "Hyperion Water Reclamation Plant," accessed September 2018, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=14pem1j6yo_5&_afrLoop=8528545490737215#!.

**Table 5.18-1**
**Estimated Water Demand**

| Land Use | Quantity | Demand Factor (gpd/unit)[a] | Daily Demand (gpd)[c] | Annual Demand (afy) |
|---|---|---|---|---|
| Proposed - School | 625 students | 13.8 gpd/student | 8,625 | 9.67 |
| *Existing Use -School* | *585 students* | *13.8 gpd/student* | *8,073* | *9.05* |
| *Existing Use-Apartment[b]* | *20 du* | *187.5 gpd/du* | *3,750* | *4.20* |
| **Net Total** | | | **(3,198)** | **(3.58)** |

*Note: afy = acre-feet per year; gpd = gallons per day; sq ft = square feet; du = dwelling units*
*a 125 percent sewage generation loading factor; Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.*
*b Apartment rate based on a 2-bedroom average for all of the units.*
*c () denotes where there would be a reduction from existing conditions.*

**Table 5.18-2**
**Estimated Sewage Generation**

| Land Use | Quantity | Factor (gpd/unit)[a] | Daily Demand (gpd)[c] | Annual Demand (afy) |
|---|---|---|---|---|
| School | 625 | 11 gpd/student | 6,875 | 7.71 |
| *Existing Use -School* | *585* | *11 gpd/student* | *6,435* | *7.21* |
| *Existing Use-Apartment[b]* | *20 du* | *150 gpd/du* | *3,000* | *3.36* |
| Total: | | | (2,560) | (2.87) |

*Note: gpd = gallons per day, afy= acre-feet per year, du = dwelling unit.*
*a Los Angeles Bureau of Sanitation, Sewage Generation Factors, April 2012.*
*b Apartment rate based on a 2-bedroom average for all of the units.*
*c () denotes where there would be a reduction from existing conditions.*

### *c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**Less than Significant Impact.** A significant impact could occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, resulting in the construction of new stormwater drainage facilities. As described previously, the Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site currently would be collected on the site and directed toward existing storm drains in the Project vicinity. The Project will be required to demonstrate compliance with Low Impact Development (LID) Ordinance standards and retain or treat the first ¾ inch of rainfall in a 24-hour period. Thus, the rate of post-development runoff and pollutants from the parking area would be reduced under the Project. The Project would not create or contribute water runoff that would exceed the capacity of existing or planned stormwater drainage systems. Impacts would less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new and expanded entitlements needed?*

**Less than Significant Impact.** A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the project results in a significant impact on water shall be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project completion; (c) the amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

According to the 2015 City's Urban Water Management Plan (UWMP), the City's projected demand for water, during a single dry season would be 513,540 acre-feet per year (afy) for 2015 and 611,800 afy for 2020.[62] The *UWMP* projects adequate water supplies through 2040. The net Project demand of 14,742 gpd would be approximately 2.9 percent of the City of Los Angeles' available capacity during a single dry year. As such, it is expected that LADWP has sufficient water supplies available to serve the Project.[63] Furthermore, as previously stated, the Applicant shall adhere to current standards including the Green

62 City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2015).
63 City of Los Angeles Department of Public Works, *2015 City of Los Angeles Urban Water Management Plan* (2015).

Building Code that would reduce demand on local water supplies. Impacts of the Project would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *e. 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.** Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant wastewater impact if (a) the project would cause a measurable increase in wastewater flows to a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or (b) the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the *Wastewater Facilities Plan* or *General Plan* and its elements. As stated above, the Hyperion Water Reclamation Plant is expected to have capacity to serve the Project. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

### *f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

**Less Than Significant Impact.** A significant impact could occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide*, the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the Source Reduction and Recycling Element (SRRE) or its updates, the Solid Waste Management Policy Plan (SWMPP), or the Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multifamily developments, private haulers provide waste collection services for most

multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, and transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Chiquita Canyon Landfill and the Manning Pit Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Chiquita Canyon Landfill currently has a remaining capacity of 4.9 million tons.[64] The Manning Pit Landfill has a remaining capacity of 540,000 tons.[65] Thus, the Chiquita Canyon Landfill and Manning Pit Landfill combined have a remaining permitted capacity of approximately 5.4 million tons. The Chiquita Canyon Landfill has an estimated remaining life of 4 years. An expansion of the Chiquita Canyon Landfill is currently proposed and would add a capacity of 23,872,000 tons (a 21-year life expectancy).

Construction of the Project would comply with the City's Citywide Construction and Demolition (C&D) Waste Recycling Ordinance. As such, construction waste would be removed from the Project Site by a City-permitted solid waste hauler and taken to a City-certified C&D processing facility. As shown in **Table 5.18-3: Expected Operational Solid Waste Generation,** the Project results in a net reduction during the life of the Project of 60.0 pounds per day.

This estimate is conservative because it does not factor in any recycling or waste diversion programs. The amount of solid waste generated by the Project is within the available capacities at area landfills. Furthermore, the Project Applicant shall be required to comply with the following regulatory measures regarding recycling. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

64 County of Los Angeles Department of Public Works, *Los Angeles Countywide Integrated Waste Management Plan, 2011 Annual Report* (March 2013).

65 County of Los Angeles Department of Public Works (February 2014).

**Table 5.18-3**
**Expected Operational Solid Waste Generation**

| Type of Use | Size | Waste Generation Rate (lb./unit/day) | [a]Total Solid Waste Generated (lb./day) |
|---|---|---|---|
| School | 625 students | 0.5 lb/student/day | 312.5 |
| *Existing – School* | *585 students* | *0.5 lb/student/day* | *292.5* |
| *Existing – Apartment*[b] | *20 du* | *4 lbs/du/day* | *80* |
| Total Project Waste Generation | | | (60) |

*Notes: lb. = pounds, du = dwelling unit*

*a CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

*b Apartment rate based on a 2-bedroom average for all of the units.*

*() denotes where there would be a reduction from existing conditions.*

### *g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?*

**Less than Significant Impact.** A significant impact could occur if a project were to generate solid waste that was not disposed of in accordance with applicable regulations. The Project would generate solid waste during both construction and operation that is typical of a school uses and would comply with all federal, State, and local statutes and regulations regarding proper disposal. As such, impacts would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

# 5.19 MANDATORY FINDINGS OF SIGNIFICANCE

## Impact Analysis

***a. Does the project have the potential to 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, 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.** A significant impact could occur only if the Project would have an identified potentially significant impact for any of the issues cited above: quality of the environment; habitat or populations of fish or wildlife species; plant or animal communities; rare or endangered plant or animal; or important examples of the major periods of California history or prehistory. As indicated by the analysis in this Initial Study, the Project would not substantially reduce the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. Nor would the Project potentially affect important historic or prehistoric resources. Though potentially significant impacts were identified with respect to biological resources, tribal cultural resources, and construction noise, implementation of the mitigation measures described in this Initial Study would reduce those impacts to less than significant levels. Therefore, impacts on the quality of the environment would be less than significant.

***Mitigation Measures:*** No mitigation measures are necessary.

***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.** Cumulative impacts can occur when the impacts of two or more separate projects are considerable when considered together. In the preceding topical analyses, cumulative impacts have been considered where appropriate. For example, the evaluation of air quality impacts considered the Project's cumulative contribution to federal or State nonattainment pollutants within the Basin and the evaluation of traffic impacts considered the cumulative effect of other proposed projects in the immediate vicinity. Through the analyses, no significant cumulative impacts were identified for the Project.

***Mitigation Measures:*** No mitigation measures are necessary.

### *c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?*

**Less than Significant Impact with Project Mitigation.** As discussed in the preceding sections, the Project could result in potentially significant impacts related to biological resources, tribal cultural resources, and construction noise. Mitigation Measures **MM BIO-1, MM TCR-1, and MM NOI-1** as listed in **Section 5.4, 5.17,** and **Section 5.12,** respectively, have been identified to address these impacts.

***Mitigation Measures:*** Applicable mitigation measures have been identified in the Biological Resources an Noise sections in this Initial Study. With incorporation of these measures, impacts of the Project would be less than significant.

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