

# DEPARTMENT OF CITY PLANNING

# **RECOMMENDATION REPORT**

City Pla	anning C	commission	Case No.:	CPC-2015-3720-VCU-CU- SPR-ZAD-ZAA	
Date: Time: Place:			CEQA No.: Incidental Cases: Related Cases:	ENV-2014-572-EIR SCH No. 2014061059 None	
Public H Appeal S Expiratio Multiple	Status:	October 6, 2016 Vesting Conditional Use and Conditional Use Appealable to City Council November 22, 2016 Vesting Conditional Use with Determinations for Height and Area Modifications; Conditional Use; Site Plan Review; Administrator Adjustments; Determination	Council No.: Plan Area: Specific Plan: GPLU: Zone: Applicant: Representative:	ZA-92-0372(CUZ) (PA1), (PA2), (PA3) CUZ 78-108(PAD), (PA1), (PA2) 11 – Mike Bonin Brentwood – Pacific Palisades West Los Angeles Transportation Improvement and Mitigation Plan (East Campus) Very Low II Residential East Campus: RE11-1 West Campus: RE15-1 The Brentwood School Michael Riera, Ph.D. Armbruster Goldsmith & Delvac, LLP (Dale Goldsmith)	

**PROJECT**100 S. Barrington Place (East Campus) and 12001 W. Sunset Boulevard (West Campus),**LOCATION:**Los Angeles, CA 90049.

**PROPOSED** Brentwood School, the Project Applicant, is proposing to the Brentwood School Education **PROJECT:** Master Plan. Brentwood School is an independent K-12 coed day school with 995 students and facilities on two separate campuses located approximately one-half mile apart in the Brentwood-Pacific Palisades Community of the City of Los Angeles. The East campus, located at 100 S. Barrington Place, is approximately 7.5 acres in size and contains existing facilities currently used for grades 7-12. Portions of the East Campus occupy land owned by the West Los Angeles Veterans Administration. The West Campus, located at 12001 Sunset Boulevard, is approximately 3.5 acres in size, and contains existing facilities currently used for grades K-6.

On the East Campus, the Project would include three new buildings, two replacement buildings, and renovation and expansion of two buildings. These improvements would allow

the 6<sup>th</sup> grade to be relocated from the West Campus to the East Campus in support of the expanded middle school program. Two existing buildings would be removed to accommodate new or replacement facilities. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. These improvements would result in the removal of approximately 43,660 square feet of existing floor area and construction of approximately 287,960 square feet of new building floor area, resulting in a net addition of approximately 244,300 square feet. The resulting floor area ratio (FAR) on the East Campus would be approximately 1.2 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning. In addition, vehicular circulation, parking, pedestrian circulation, and athletic and open space areas would be modified to accommodate the new buildings and improve access, circulation, parking, and athletic and open space areas. The Project would add 108 net new parking spaces on the East Campus within two ground floor garages located under new buildings.

On the West Campus, the Project would include two new buildings and one replacement building. Seven existing buildings would be removed to accommodate new or replacement facilities. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area or height. The improvements would result in the removal of approximately 28,881 square feet of building floor area and construction of approximately 61,000 square feet of new building floor area, resulting in a net addition of approximately 32,119 square feet. The resulting FAR on the West Campus would be approximately 0.48 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning. In addition, vehicular circulation, parking, pedestrian circulation, and athletic and open space areas would be modified to accommodate the new buildings and improve access, circulation, parking, and athletic and open space areas. The Project would add 28 net new parking spaces within two subterranean garages located below two of the Project's new buildings. A haul route for the East and West Campus is also requested.

- REQUESTED
   ACTION:
   Pursuant to Section 21082.1 (c)(3) of the California Public Resources Code, Certification of an Environmental Impact Report (EIR) (ENV-2014-572-EIR) for the above-referenced Project. Adoption of the proposed Mitigation Monitoring Program and the required Findings for the adoption of the EIR. Adoption of a Statement of Overriding Considerations setting forth the reasons and benefits of adopting the EIR with full knowledge that significant impacts may remain;
  - 2. Pursuant to Section 12.24 T of the Municipal Code, a **Vesting Conditional Use Permit** for both the East and West Campuses to allow a private school in the RE zone;
  - 3. Pursuant to Section 12.24 F of the Municipal Code, a **Determination** to permit the following height and area modifications:

# East Campus:

- a. Modification from LAMC Section 12.07 C to allow a front yard setback of 0 feet in lieu of the 20 percent of lot depth up to a maximum of 25 feet;
- b. Modification from LAMC Section 12.07 C to allow a side yard setback for the south side yard of 0 feet in lieu of the 7 foot minimum;
- c. Modification from LAMC Section 12.07 C to allow a rear yard setback of 0 feet in lieu of the 25 percent of the lot depth up to a maximum of 25 feet; and
- d. Modification from LAMC Section 12.21.1 height regulations to permit the maximum height of up to 80 feet in lieu of a limit of 36 feet as would otherwise be required.

West Campus:

- e. Modification from LAMC Section 12.21.C.10, to allow a maximum height of up to 54 feet in lieu of a limit of 36 feet as would otherwise be required.
- 4. Pursuant to Section 12.24 X.28 of the Municipal Code, a **Determination** to:
  - Exceed the limitations of the Baseline Hillside Ordinance pursuant to Section 12.21 C.10(f)(2)(iii) and 12.21 C.10(f)(3)(i), to permit 5,000 cubic yards of grading and export in connection with the construction of two buildings on the West Campus;
- 5. Pursuant to Section 12.28 of the Municipal Code, an Administrator Adjustment to:
  - a. Provide relief from LAMC Section 12.22 C.20(f) and permit protective sports netting along the perimeter of the East Campus along Sunset Boulevard at a permanent height of 20 feet and up to a height of 50 feet during football season, in lieu of the eight feet otherwise permitted.
- 6. Pursuant to Section 12.24 W.51 of the Municipal Code, a **Conditional Use Permit** for a childcare facility;
- 7. Pursuant to Section 16.05 of the Municipal Code, **Site Plan Review** to permit an increase of 50,000 square feet for construction of non-residential uses for the East Campus;

# **RECOMMENDED ACTIONS:**

1. **Find** the City Planning Commission has reviewed and considered the information contained in the Environmental Impact Report prepared for this project, which includes the Draft and Final Environmental Impact Report and its Errata No.1, comprising ENV-2014-572-EIR, (State Clearinghouse No. 2014061059), as well as the whole of the administrative record.

**Certify** the following:

- a. The above referenced EIR has been completed in compliance with the California Environmental Quality Act (CEQA);
- b. The above referenced EIR was presented to the City Planning Commission] as a decision-making body of the lead agency; and
- c. The above referenced EIR reflects the independent judgment and analysis of the lead agency.

Adopt all of the following:

- a. The related and prepared Environmental Findings for the above referenced EIR];
- b. The Statement of Overriding Considerations included in this report;
- c. The Mitigation Monitoring Program prepared for the above referenced EIR included in this report.
- 2. **Approve** a **Vesting Conditional Use** to permit the continued use, operation and maintenance of an educational institution in the RE11-1 and RE15-1 zones to permit the implementation of the Brentwood School Education Master Plan, subject to the attached conditions of approval;

Pursuant to LAMC Section 12.24 F (Conditional Use Conditions of Approval), the height and area regulations required by other provisions of the LAMC governing these zones shall not apply to this Conditional Use approval, and this grant shall permit the Project as proposed subject to the attached conditions of approval;

This grant shall supersede and replace the previous Conditional Use Permit and Plan Approvals for the Brentwood School: ZA-92-0372(CUZ), ZA-92-0372(CUZ)(PA), ZA-92-0372(CUZ)(PA2), and ZA-92-0372(CUZ)(PA3) for the East Campus; and CUZ-78-108, CUZ-78-108(PAD)(CU)(PA1), CUZ-78-108(PA1), CUZ-78-108(PA2), CPC-1273-ZA, and ZA-93-1060(ZAI) for the West Campus.

- 3. **Approve a Determination** pursuant to LAMC Section 12.24 X.28, to allow approximately 5,000 cubic yards of grading and export in the Hillside Area;
- 4. **Approve an Adjustment** pursuant to LAMC Section 12.28, to allow sports netting with a permanent height of 20 feet and a height of 50 feet during football season along the East Campus perimeter along Sunset Boulevard in lieu of the eight feet otherwise permitted in the front yard;
- Approve a Conditional Use to permit the continued use, operation and maintenance of a childcare facility in the RE15-1 zone to permit childcare for employees of the Brentwood School, in conjunction with the implementation of the Brentwood School Education Master Plan, subject to the attached conditions of approval;
- 6. **Approve Site Plan Review** for a project which results in an increase of 50,000 gross square feet or more of non-residential area, subject to the attached conditions of approval;
- 7. Adopt the attached Findings;
- 8. Advise the Applicant that, pursuant to California State Public Resources Code Section 21081.6, the City shall monitor or require evidence that mitigation conditions are implemented and maintained throughout the life of the project and the City may require any necessary fees to cover the cost of such monitoring; and
- Advise the applicant that pursuant to State Fish and Game Code Section 711.4, a Fish and Game Fee is now required to be submitted to the County Clerk prior to or concurrent with the Environmental Notice of Determination (NOD) filing.

VINCENT P. BERTONI, AICP Director of Planning

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Charles J. Rausch, Jr., Associate Zoning Administrator

Elva Nuño-O'Donnell, Hearing Officer City Planner

Luciralia Ibarra, Senior City Planner

mnill

Adam Villani, City Planner Telephone: (818) 374-5067

## CPC-2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

**ADVICE TO PUBLIC:** \*The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the *Commission Secretariat, 200 North Spring Street, Los Angeles, CA 90012* (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to this programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than 7 days prior to the meeting by calling the Commission Executive Assistant (213) 978-1300 or by email at CPC@lacity.org.

Project Analysis A-1
Project Summary Background Issues and Staff Recommendations Conclusion
Conditions of Approval C-1
FindingsF-1
General Plan/Charter Findings Entitlement Findings CEQA Findings/Statement of Overriding Considerations
Public Hearing and CommunicationsP-1
Exhibits: 1 – Special Events, East Campus 2 – Special Events, West Campus A – Site Plans, 10 sets of each of the following, one for each campus construction phase: A1 – Summary Sheet A2 – Demolition Site Plan A3 – Site Plan – Parking A4 – Landscape Plan–Illustrative A5 – Exterior Elevations A6 – Renderings
B – Maps B1 – Vicinity Map B2 – Radius Map

**TABLE OF CONTENTS** 

# C – Environmental Impact Report - ENV-2014-572-EIR <u>http://planning.lacity.org/eir/brentwoodschool/brentwoodSchoolCoverPg.html</u> D – Department of Transportation Traffic Assessment Letter

# PROJECT ANALYSIS

# **Project Location and Existing Uses**

The Brentwood School ("the School") is an independent private college preparatory school located on two sites approximately one-half mile west (the East Campus) and one mile west (the West Campus) of the Interstate 405 Freeway along Sunset Boulevard, within the community of Brentwood. The school provides education to coed students in grades K–6 (West Campus) and 7–12 (East Campus).

The East Campus is located at 100 S. Barrington Place, and was originally developed around 1930 as the Brentwood Military Academy, and has operated as a school ever since. The Brentwood School opened on the site in 1972 after the Brentwood Military Academy closed, and three buildings from the Brentwood Military Academy remain on the site today, integrated into the East Campus: the North Quad, South Quad, and Temple Hall. These older buildings are on the north side of the East Campus, near the Layton Drive entrance, which was formerly the main entrance to the East Campus but now sees limited use, as Layton Drive is otherwise a lightly-used residential street. The central part of the East Campus features an arroyo running from the western boundary of the East Campus, at Sunset Boulevard, to the eastern boundary of the East Campus, at Sunset Boulevard, to the eastern boundary of the East Campus, at the Veterans Administration (VA) property. The floor of the arroyo is as much as 40 feet lower in elevation than the higher slopes of the East Campus on the northern side near Layton Drive and the southern side near Barrington Place and the Brentwood Village commercial district.

Several newer buildings on campus take advantage of the site's varied topography, notably the Science/Library/Theater Building, which rises four stories from the arroyo floor but matches the roofline of the adjoining two-story South Quad building, which is built on higher ground. Other buildings on the East Campus include the Gymnasium/Classroom building and the smaller Academic Village building, featuring four classrooms. The Middle School Athletic Field occupies the western portion of the arroyo floor. Vehicle circulation generally leads downhill from the "Sunset Gate" or "Main Gate" entrance at 100 S. Barrington Place, then eastward across the arroyo and out of the East Campus through the VA Property, thence back up to Barrington Place at what is known as the "Village Gate," across from Chayote Street. Surface parking is located near the Middle School Athletic Field, uphill near the northeastern boundary of the East Campus, and on the arroyo floor contiguous with parking used by the School but located on the VA Property. The School also uses several athletic facilities on the VA Property.

The West Campus is located at 12001 Sunset Boulevard, and was originally developed in 1947 as the Marymount Junior School. It has also operated continuously as a school since, as the Brentwood School purchased the property in 1995 to open as their new elementary school. This site has a moderate slope from its southwest to northeast corners, and is developed with several existing buildings. The Main Classroom Building is the largest, dating back to the Marymount Junior School and occupying a substantial portion of the western edge of the West Campus. To its north lies the Arts and Athletics Building, which houses a gymnasium and activity rooms, and can also be used for assemblies. In the eastern part of the West Campus are several small buildings: the Admissions Building. Vehicular access for student drop-offs and pickups is on the west side of the West Campus via a driveway off of Bundy Drive that leads to a multi-lane drop-off/pickup area as well as an underground parking garage beneath the Arts and Athletics Building further north onto Bundy Drive. Secondary

vehicular access is on the east side of the West Campus, where a driveway off of Saltair Avenue leads to a surface parking lot for some staff members and access to the employee childcare center.

## Project Summary

The proposed Brentwood School Master Plan (the Project), to be implemented in four phases, consists of the replacement and enhancement of academic facilities, parking, and circulation, enabling the School to move the 6<sup>th</sup> grade to the East Campus as part of its Middle School. A new Vesting Conditional Use Permit (CUP) would govern the use of the site, replacing the existing CUPs that have been in effect on the East Campus since 1992 and the West Campus since 1978. The four project construction phases are planned as follows: Phase I, 2016 to 2020; Phase II, 2024 to 2027; Phase III, 2030 to 2034; and Phase IV, 2038 to 2040. The East Campus has construction activity in all four phases, while the West Campus sees activity in Phase I and Phase III.

On the East Campus, the Education Master Plan includes three new buildings, two replacement buildings, and two renovated/expanded buildings over the approximately 30-year Education Master Plan. Two buildings would be removed to accommodate new or replacement facilities. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. The phasing of the East Campus, including the floor areas to remain, be removed, or be built is detailed in Table 1, East Campus Project Components. At full buildout, the floor area ratio (FAR) on the East Campus would be approximately 1.2 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning. The Project would increase the number of students allowed to be enrolled at the East Campus from 695 to 960, enabling the School to move its 6<sup>th</sup>-grade program from the West Campus to the East Campus in an expanded middle school program. In addition, the Education Master Plan would add 157 net new parking spaces on the East Campus.

A design alternative to build the East Campus athletic field to California Interscholastic Federation (CIF) regulations is also being proposed and is detailed in the attached site plans, Exhibit A, dated September 14, 2015. The CIF-regulation design alternative would build a larger Athletic Field further to the north by 12 feet and to the east by approximately 32 feet, and also include a reconfiguration and reduction of the square footage of the new Middle School Gym and the Upper School Arts Building.

On the West Campus, the Education Master Plan would largely improve existing facilities, open green areas and play spaces, and would create a separate area for kindergartners. It would include the construction of two new buildings and one replacement building over the lifetime of the Education Master Plan. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. Seven buildings would be removed to accommodate new or replacement facilities. In addition, the Education Master Plan would add 28 net new parking spaces. The existing building floor space to be removed and the proposed new floor space for each building on the West Campus are detailed in Table 2, West Campus Project Components. At full buildout, the FAR on the West Campus would be approximately 0.6 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning. Enrollment would remain at 300 students, despite the 6<sup>th</sup> grade being moved from the West Campus to the East Campus.

		Existing (sq. ft. or	Net Change (sq. ft. or	Total (sq. ft. or
Building	Phase	spaces)	spaces)	spaces)
Existing Buildings to Remain				
North Quad		11,547	_	11,547
South Quad		18,893	_	18,893
New Buildings				
Middle School Classroom Building	I	_	85,000	85,000
Northeast Classroom Building	П	_	12,000	12,000
Upper School Gymnasium Building	Ш	_	75,000	75,000
Replacement Buildings				
Middle School Gymnasium (replaces Academic Village)	II	—	35,000	35,000
Upper School Arts Building (replaces Existing Gymnasium/Classroom Building)	IV	—	60,000	60,000
Renovated/Expanded Buildings				
Science/Library/Theater Building	IV	41,631	20,000	61,631
Temple Hall	I	4,698	960	5,658
Buildings to Be Removed				
Gymnasium/Classroom Building	IV	41,100	(41,100)	—
Academic Village Building	П	2,560	(2,560)	—
New Parking				
Middle School Classroom Building Garage	I	_	223 <sup>b</sup>	223
Upper School Arts Building Garage	IV	_	82	82
Parking to Be Removed				
North Parking Lot	II and III	71	(71)	_
South Parking Lot	Ι	55	(55)	_
Pool and Lower Reserved Lot	Ш	9	(9)	_
Total Square Feet		120,429	244,300	364,729
Total Parking Spaces		135	170	305

Table 1 East Campus Project Components<sup>a</sup>

<sup>a</sup> All units expressed in square feet of floor area as defined in Los Angeles Municipal Code, Section 12.03, except for parking figures. <sup>b</sup> Thirteen spaces will be added in Phase II.

Ruilding	Phase	Existing (sq. ft. or	Net Change (sq. ft. or	Total (sq. ft. or
Building Existing Building to Remain	FlidSe	spaces)	spaces)	spaces)
Arts and Athletics Building		12,422	—	12,422
New Buildings				
Saltair Annex	I	_	28,500	28,500
Admissions Building	III		8,000	8,000
New Classroom Building	III		24,500	24,500
Buildings to Be Removed				
Admissions Building	I	3,200	(3,200)	—
Child Care Building	I	1,047	(1,047)	—
Science Building	I	1,107	(1,107)	—
Art Building	I	1,436	(1,436)	—
Music Building	I	1,176	(1,176)	—
Community Room Building	I	449	(449)	—
Main Classroom Building	III	20,466	(20,466)	—
Existing Parking to Remain				
Arts and Athletics Building Garage		65	_	—
New Parking				
Saltair Annex Parking Garage and Saltair Drop-off	I	_	21	21
New Classroom Building Parking Garage		—	30	30
Parking to Be Removed				
Saltair Annex Surface Parking	I	27	(27)	—
Total Square Feet		41,303	32,119	73,422
Total Parking Spaces <sup>b</sup>		92	24	116

# Table 2 West Campus Project Components<sup>a</sup>

<sup>a</sup> All units expressed in square feet of "floor area," as defined in Los Angeles Municipal Code, Section 12.03,

except parking figures. <sup>b</sup> The existing number of spaces, including the Saltair Lot and the Arts and Athletic Building, is 92. The total spaces on Campus after implementation of the Education Master Plan would be 120.

# **Background**

The East Campus, located at 100 S. Barrington Place, is a large, irregularly shaped, hillside parcel of land containing approximately 7.4 acres generally bound by Sunset Boulevard on the west, Barrington Place and commercial properties on the south, Veterans Administration property on the southeast, and residential properties on the north and northeast fronting Sunset Boulevard, Layton Drive, and Woodburn Drive.

The East Campus was originally developed in 1930 as the Brentwood Military Academy. In 1972 the Brentwood School was founded and took control of the East Campus property, later renovating and expanding the facilities, now enrolling 695 co-educational students in grades 7 through 12.

The Brentwood-Pacific Palisades Community Plan designates the East Campus as "Very Low II Residential" with a corresponding zone of RE11-1 (Residential Estate). The East Campus is located within the boundaries of the West Los Angeles Transportation Improvement and Mitigation Plan, adopted in 1997 as part of the City's General Plan and currently under revision. The TIMP includes a mechanism to fund specific transportation improvements by assessing an impact fee from new development. Pursuant to Section 5 of the TIMP, however, the East Campus is not subject to the various requirements of the TIMP because it is not defined as a "project" under the TIMP, which is defined to only include developments in the R3 zone or a less restrictive zone. The Project's zoning, RE11 and RE15, is more restrictive than R3.

The residential properties to the north, northeast, and across Sunset Boulevard to the west of the East Campus are designated by the Brentwood-Pacific Palisades Community Plan as "Very Low II Residential" with a corresponding zone of RE11-1. The adjacent Veterans Administration property is outside the City of Los Angeles jurisdiction. Properties to the south in the vicinity of Barrington Place and Sunset Boulevard are designated "General Commercial" and "Neighborhood Commercial," are zoned C2-1XLD and R3-1L, and are developed as multi-family residences and commercial uses with associated parking.

The West Campus, located at 12001 Sunset Boulevard, is a sloping, irregular-shaped, through, corner parcel of land, consisting of approximately 3.4 acres, having a frontage of approximately 390 feet on the north side of Sunset Boulevard and an approximate depth varying from 245 to 510 feet. The West Campus features a moderate upslope from Sunset Boulevard to the school buildings and lawn.

The West Campus was originally developed in 1947 as the Marymount Junior School campus. The Brentwood School became a K-12 educational institution in 1994 when it purchased this property and converted it into their Lower School, currently enrolling 300 students in grades K through 6.

The Brentwood-Pacific Palisades Community Plan designates the West Campus as "Very Low II Residential" with a corresponding zone of RE15-1 (Residential Estate). The West Campus is not located within any Specific Plan area but is designated as a Hillside Area subject to the Baseline Hillside Ordinance.

The residential properties to the north of the West Campus along Saltair Avenue are designated by the Brentwood-Pacific Palisades Community Plan as "Very Low II Residential" with a corresponding zone of RE15-1, and are developed with single-family homes. Other adjacent properties are designated "Low Residential" with a corresponding zone of R1-1, and are also developed with single-family homes, with the exception of the adjoining property to the east across Saltair Avenue, which is developed with St. Martin of Tours Catholic Church and School. Properties to the west across Bundy Drive are zoned R1-1 and are developed with one-and two-story single-family dwellings.

As noted in the Environmental Impact Report, neither campus has any buildings or districts designated as historic resources.

# Existing Entitlements

On the East Campus, the original Conditional Use (ZA 92-0372) was granted by the Zoning Administrator on September 11, 1992. There have been three plan approvals, as further described in the following sections, requested and approved by the Zoning Administrator; the last one on August 1, 2011. The East Campus is permitted by the original CUP to operate as a private school, grades 6 through 12, with a maximum enrollment of 695 students, although the site is currently only used for grades 7 through 12. A maximum of approximately 100,000 square feet of buildings were permitted on the site, with 190 on-site parking spaces and the use of 122 spaces on the adjacent Veterans Administration property. At this time the address and main entrance of the East Campus was relocated from Layton Drive to Barrington Place. Subsequent plan approvals have authorized the alteration, demolition, or construction of several buildings. Operational conditions included traffic reduction measures such as a ride-sharing program and a trip cap of 375 student, faculty, or staff vehicles entering the school grounds weekday morning peak hours. A Zoning Administrator communication on April 20, 2000 indicated that enrollment figures were not received and that there was evidence that students were parking in a nearby public parking lot.

On the West Campus, the original Conditional Use (CPC-1273) was granted by the City Planning Commission on March 7, 1947, authorizing an elementary school (Marymount School) on the site. A subsequent Conditional Use (CUZ-78-108) was granted by the Zoning Administrator on June 16, 1978, relocating the main pickup/dropoff area from the Saltair Avenue frontage to a new one-way driveway along the Bundy Drive frontage. A Zoning Administrator's Interpretation (ZA-93-1060(ZAI)) was issued on December 10, 1993 finding that the Brentwood School purchasing the West Campus from Marymount School and using it as their Lower School represented a continuation of the use allowed by the earlier Conditional Uses. Three further plan approvals under CUZ-78-108 were issued for additional construction on the West Campus, including the construction of the Arts and Athletics Building and parking garage.

# **Street Designations**

<u>Sunset Boulevard</u> is an Avenue I with a 100-foot right-of-way in the vicinity of the subject property, although across its length it generally runs east-west, in the Project vicinity it runs roughly north-south along the western boundary of the East Campus and northeast-southwest along the southeastern boundary of the West Campus. In the Project vicinity, Sunset Boulevard provides two through lanes in each direction and left-turn channelization at most signalized intersections. Parking is prohibited along Sunset Boulevard in the area through signage or red curbs. The portion of Sunset Boulevard adjacent to the West Campus has a red-painted curb to prohibit parking, and a retaining wall leaving no space for a sidewalk or other pedestrian traffic, although the south side across from the West Campus is improved with a sidewalk.

<u>Barrington Place</u> is a Local Street with a 60-foot right-of-way with an east-west-trending segment bordering a portion of the East Campus to the south, and then turning south with a 70-foot right-of-way so that commercial properties along Barrington Place continue the East Campus's southern boundary. Barrington Place generally provides one lane of travel in each direction, with a painted median, although at the signalized intersection with Sunset Boulevard, Barrington Place is striped to allow for one eastbound lane of travel, one left-turn lane from westbound Barrington Place to southbound Sunset Boulevard, and two right-turn lanes from westbound Barrington Place to northbound Sunset Boulevard. Metered parking is available along a portion of the north side of the street, adjacent to the School's property.

<u>Layton Drive</u> is a local street with a 40-foot right-of-way bordering the East Campus and several of its adjacent residences to the north. Layton Drive provides one through lane in each direction, with parking generally allowed on both sides of the street but restricted in the immediate vicinity of the Brentwood School gate. Layton Drive is improved with curbs and gutters but no sidewalks or parkways.

<u>Barrington Avenue</u> is an Avenue II with an 83-foot right-of-way south of Sunset Boulevard in the Project vicinity and a Local Street north of Sunset Boulevard. In the Project vicinity, Barrington Avenue provides one through lane in each direction, with left-turn channelization at Sunset Boulevard, and parking is generally provided on both sides of the street.

<u>Bundy Drive</u> is a Local Street with a 60-foot right-of-way running roughly north-south adjacent to the western boundary of the West Campus. Bundy Drive generally provides one lane of travel in each direction, although the signalized intersection with Sunset Boulevard is striped to allow one northbound lane of travel, one left-turn lane from southbound Bundy Drive to eastbound Sunset Boulevard, and one right-turn/through lane allowing southbound travel on Bundy Drive to continue or turn westbound onto Sunset Boulevard. Parking is prohibited at all times on the east side of the street, adjacent to the West Campus, which is improved with a curb but no sidewalk or other space for pedestrian traffic. The west side of the street across from the West Campus is improved with a curb, parkway, and sidewalk. Parking is permitted on the west side of the street but is restricted at certain times.

<u>Saltair Avenue</u> is a Local Street with a 60-foot right-of-way running roughly north-south adjacent to the eastern boundary of the West Campus. Saltair Avenue generally provides one lane of travel in each direction and has a signalized intersection with Sunset. The west side of the street, adjacent to the West Campus, has a curb and parkway, but no sidewalk. The east side of the street across from the West Campus is improved with a curb, parkway, and sidewalk. Parking is generally allowed on the west side of the street, although not alongside the portion of the West Campus closest to the intersection with Sunset Boulevard. Parking is prohibited on the east side of Bundy Drive in the immediate vicinity of the West Campus but is allowed further north.

# **Related On-Site Cases**

# East Campus

Case No. ZA 92-0372(CUZ)(PA3) – On August 1, 2011, pursuant to the Los Angeles Municipal Code Section 12.24-M, the Zoning Administrator found that the applicant had operated "without incident for several years," and approved the demolition of an existing pool building and the installation of two modular buildings housing a total of seven classrooms.

Case No. ZA 92-0372(CUZ)(PA2) – On August 21, 2003, pursuant to the Los Angeles Municipal Code Section 12.24-M and Condition No. 1 of Case No. ZA 92-0372(CUZ), the Zoning Administrator found that the applicant had operated in harmony with its surroundings and had the support of its neighborhood, approving new swimming pool facilities to replace existing pool facilities and a second-floor addition to an existing two-story administration building.

Case No. ZA 92-0372(CUZ)(PA) – On September 5, 2002, pursuant to the Los Angeles Municipal Code Section 12.24-M and Condition No. 1 of Case No. ZA 92-0372(CUZ), the Zoning Administrator cited the unobtrusive nature of the request and the support of its neighborhood in approving alterations and additions to three existing buildings.

Case No. ZA 92-0372(CUZ) – On September 11, 1992, pursuant to the Los Angeles Municipal Code Section 12.24-C, the Zoning Administrator approved the continued maintenance and operation of a private junior/senior high school, increasing the student enrollment cap from 480 to 695 and imposing a broad array of conditions, including restrictions on use, noise, access, parking, and traffic.

Case No. ZV 81-028 – On March 20, 1981, the Zoning Administrator granted variance authority for the construction of the Gymnasium/Classroom building with fewer than the Code-required number of parking spaces, as the athletic fields could be used for occasional overflow parking.

A series of Board of Zoning Appeals cases were granted as Case Nos. BZA-2700, 2765, and 2831 on October 16, 1979, July 10, 1980, and February 2, 1981, respectively, authorizing the construction or renovation of several buildings, parking, and access roads on the East Campus to convert the former Brentwood Military Academy into the Brentwood School, as well as establishing an enrollment cap of 480 students. A plan approval was granted on November 20, 1987, to construct the Science/Library/Theater building.

Case No. CPC-1161 – This was approved by the City Planning Commission on November 26, 1946 approving the construction of the Brentwood Military Academy on the East Campus, first establishing a school on the site and constructing the buildings on the East Campus that are today the North Quad, South Quad, and Temple Hall.

# West Campus

Case No. CUZ 78-108(PA2) – On March 17, 2006, pursuant to the Los Angeles Municipal Code Section 12.24-M and Condition No. 47 of Case No. CUZ 78-108(PA1), the Zoning Administrator determined that compliance with the conditions of the prior action on the site had been attained, and thus authorized the construction of the Arts and Athletics Building and parking garage while imposing a broad array of conditions restricting use, noise, parking, and traffic on the site.

Case No. CUZ 78-108(PA1) – On August 12, 2003, the Chief Zoning Administrator approved plans to permit a modular classroom unit to be added to the existing West Campus.

Case No. CUZ 78-108(PAD)(CU)(PA1) – On May 13, 1997, the Zoning Administrator approved plans to permit the construction, use, and maintenance of a multipurpose building and parking garage for the existing elementary school. This was not built until after the approval of Case No. CUZ 78-108(PA2) in 2006.

Case No. ZA 93-1060(ZAI) – On December 10, 1993, the Chief Zoning Administrator confirmed that the use by the Brentwood School as an elementary school with a maximum enrollment of 300 students constituted a continuation of the previously permitted use of the West Campus by

Marymount School as an elementary school. On May 31, 1995, the Chief Zoning Administrator confirmed the conditional use status of the subject property.

Case No. CUZ 78-108 – On June 16, 1978, the Zoning Administrator approved a conditional use to permit the modification of Case No. CPC-1273, which previously authorized a private elementary school on the subject site, to now permit a one-way, looping driveway system for the pick-up and delivery of school children along the Bundy Drive frontage, rather than from Saltair Avenue. Plan approvals were granted by the Zoning Administrator on December 14, 1979 and March 11, 1983 for the construction of various improvements on the West Campus, including a masonry-iron fence, parking, basketball court, small garage, and workshop/storage building.

Case No. CPC 16829-E – On November 15, 1965, an ordinance was published changing the zone of the West Campus, among other properties, from R1-1 to RE15-1.

Case No. CPC 1273 – On March 6, 1947, the City Planning Commission granted a conditional use for the West Campus site as an elementary school, originally for Marymount School.

# Correspondence Received From Other City Departments

<u>Bureau of Sanitation:</u> In letters dated December 29, 2015 and September 13, 2016, the Bureau of Sanitation, Wastewater Engineering Services Division conducted two preliminary evaluations of the potential impacts to the wastewater and stormwater systems for the Proposed Project. Both letters reached the same conclusion, that the sewer system might be able to accommodate the total flow for the Project, and that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. Ultimately, the sewage flow would be conveyed to the Hyperion Water Reclamation Plant, which has sufficient capacity for the project. The letters also contained notifications of stormwater Low Impact Development requirements and information on groundwater dewatering reuse options.

<u>Department of Transportation</u>: The Department of Transportation (DOT) submitted an assessment letter dated March 25, 2015, and attached herein as Exhibit D, concurring with the traffic analysis in the Environmental Impact Report and requiring a detailed Traffic Management Plan to implement the plan for a zero net trip increase under the Plan. An addendum was sent by DOT on April 24, 2015 superseding the previous letter and correcting the notes on the requirement to remove metered parking spaces and place additional parking restrictions on Barrington Place adjacent to the relocated Sunset Gate driveway entrance to the East Campus.

<u>Department of Water and Power:</u> The Water Resources Section of the Department of Water and Power (DWP) sent a comment letter on February 3, 2016 containing notes about the Sustainable Groundwater Management Act and beneficial reuse of dewatering discharge, as well as general edits to the Environmental Impact Report's analysis of groundwater, hydrology, and water supply impacts. The letter also notes that if a project is accounted for in the 2010 Urban Water Management Plan, then no cumulative water supply impact is anticipated.

# Urban Design Studio-PVP

On September 20, 2016, staff met with the Urban Design Studio's Professional Volunteer Program (PVP), which provided favorable and constructive comments. The PVP supported the proposed design and provided the following suggestions: 1) Thought should be given to softening the edge conditions of the Project along Sunset Boulevard, although considering the volume and speed of traffic along Sunset Boulevard, as well as its lack of adequate bike lanes or sidewalks, it may not be desirable or safe for children to travel along Sunset Boulevard; and 2) Thought should be given to improving access to Brentwood Village from the East Campus.

Although the recommendations by the PVP were considered, the topography of the two campuses and the unsafe nature of Sunset Boulevard made infeasible any plans to encourage engagement between the students and Sunset Boulevard. Phase I of the Brentwood School Master Plan, however, does include the establishment of a new forecourt at the relocated Sunset Gate for pedestrian access between the newly constructed Middle School Classroom Building and the point where Barrington Place turns from east-west to north-south. This should provide pedestrian access and engagement between the East Campus students and the Brentwood Village shopping district.

# **Environmental Process**

The Draft EIR for the Brentwood School Master Plan was published on December 3, 2015, and circulated for public review until February 3, 2016, including an extension to 63 days. In response to public comment, the Proposed Project was refined to further clarify the Transportation Demand Management (TDM) Program and the Final EIR was released on August 30, 2016.

In accordance with Section 15126.6 of the CEQA Guidelines, "a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant impacts of the project" were evaluated based on their comparative merit. Six such alternatives were developed and analyzed in the EIR:

**Alternative 1**—No Project: This alternative considers what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. Operation of the East and West Campuses would continue under the existing CUP.

**Alternative 2**—Reduced Student Enrollment Increase: Instead of an increase of 265 students under the Project, the increase would be limited to 212 students (a reduction of 53 students, or 20 percent, as compared to the Project).

**Alternative 3**—Alternative Site Plans, East Campus: The placement of the three-story Middle School Classroom Building was considered at four possible alternative locations (Subalternatives) on the East Campus.

**Alternative 4**—Reduced Square Footage of Development, East Campus: The Upper School Gymnasium would be eliminated from the Project and total development on the East Campus would be reduced by 75,000 square feet.

**Alternative 5**—Reduced Square Footage of Development, West Campus: The Admissions building would not be constructed on the West Campus.

**Alternative 6**—Reduced Square Footage of Development, East and West Campuses Combined: The Upper School Gymnasium on the East Campus and the Admissions building on the West Campus would not be constructed.

Section 15126.6(e)(2) of the CEQA Guidelines require that the Lead Agency identify an Environmentally Superior Alternative, besides the No Project Alternatives, that reduces the most significant impacts while still meeting as many Project objectives as possible. The EIR identified Alternative 6: Reduced Square Footage of Development, East and West Campuses Combined as the Environmentally Superior Alternative because it achieves the Project's objectives to the greatest degree among the alternatives while reducing significant Project impacts.

The analysis in the EIR concluded that with the incorporation of Mitigation Measures several significant and unavoidable impacts remain from the Project, all within the Noise impact category, which also includes vibration. The Project is projected to have a temporary significant vibration impact with regard to human annoyance from on-site construction activities. Project-related vibration impacts along the haul routes from off-site construction trucks would have a less than significant impact with respect to building damage, but are projected to have a temporary and intermittent but significant and unavoidable impact with regard to human annoyance. Cumulative noise impacts from construction traffic would also be considerable if construction of the Project overlaps with the Archer Forward project and construction traffic from the two projects use the same routes. As noted in the EIR, however, the Project will seek to utilize the VA property for East Campus construction traffic and one of two alternative routes to and from the West Campus to avoid potential cumulative impacts.

# lssues

The public hearing was held on October 6, 2016 at the University Synagogue within the Brentwood community. Based on public testimony, emails and written communications received, as well as multiple staff site visits, the most relevant issues are responded to by staff as follows:

# <u>Traffic</u>

The Brentwood School is located on two campuses adjacent to Sunset Boulevard, about onehalf mile and one mile west of the I-405 freeway. The heavy, congested traffic conditions along this stretch of Sunset Boulevard were mentioned by many members of the public and are substantiated by the Traffic Study. The Traffic Study measured the Level of Service (LOS) as Level F (the worst possible rating) during every afternoon study period for three of the four study intersections along Sunset Boulevard between the two campuses, from Bundy Drive adjacent to the West Campus to Barrington Avenue between the two campuses, with the Sunset Boulevard/Barrington Place intersection, adjacent to the East Campus, measured at LOS E (the next-worst rating). As one of the few through east-west routes through Brentwood, this stretch of Sunset Boulevard collects traffic from the various educational and religious institutions, as well as the largely single and multi-family residential areas both north and south of this major scenic highway, including a substantial amount of territory in the Santa Monica Mountains, Pacific Palisades, Malibu, and portions of the City of Santa Monica, a significant employment destination. The confluence of mostly single occupancy vehicles along Sunset Boulevard results in significant delays inciting motorists to venture into residential streets in search of less congested routes. The approval of the Archer School for Girls expansion plan in 2015 required Archer to initiate the Sunset Educational Corridor Association (SECA) to coordinate transportation, construction, and event information among the institutional uses along Sunset Boulevard in Brentwood; Condition No. 32 of the Brentwood School Master Plan requires the Brentwood School to join, participate, and serve as an alternate chair of SECA.

The Brentwood School, like all institutions in Brentwood, is a contributor to this traffic, but has taken steps to reduce its contribution to this traffic. Under the existing Conditional Use Permit (Case No. ZA 92-0372(CUZ)) governing the use of the East Campus, several conditions limit the amount of traffic generated by school operations. The school is required to adopt a ride sharing program but does not specify numerical carpooling requirements; in Fall 2016 this program was modified to require that parent-driven carpools carry three students and that student-driven carpools contain four students. Carpools not meeting these minimums have to arrive before 7:30 A.M. to avoid contributing to peak-hour traffic. Daily driveway monitoring, enforcement incentives, and communications to facilitate the formation of carpools are also required. An absolute maximum of 375 vehicles carrying students, faculty, or staff entering the school grounds between the hours of 7:30 A.M. and 9:00 A.M. on weekdays is also established. Additional existing conditions limit on-campus meetings, require the posting of traffic monitors, require semi-annual third-party traffic counts, discourage pickups and drop-offs in the nearby vicinity, and establishes a voluntary busing program.

The Brentwood School Master Plan expands these programs by requiring an amended Transportation Demand Management Plan (TDM Plan) designed to ensure that there is zero net increase in vehicle trips generated by the East Campus, despite the increase in student enrollment. This TDM Plan establishes a performance-based standard of zero net increase in trips from a baseline Trip Cap, but allows the School a certain amount of flexibility in methods to achieve this requirement. These methods include increasing busing, instituting a vanpool program, increasing bicycling and walking to school (though not along Sunset Boulevard), increasing carpools by faculty and staff, the use of public transit, scheduling special events or athletic competitions to off-peak hours, etc. The baseline, established by measuring existing trip counts on the East Campus, is set at 4,563 trips over a three-day period (1,521 per day) to cover the hours from 7:30 A.M. to 8:30 A.M. and 3:00 P.M. to 6:00 P.M. In response to public comments, the hour from 6:00 P.M. to 7:00 P.M. was added to the period covered by the Trip Cap; the baseline for this hour will be established through supplemental traffic counts to be taken in a method satisfying Mitigation Measure MM-TR-1 and approved by LADOT.

While busing is currently voluntary, approximately 23 percent of East Campus students commute to school by bus. In response to public comment, and to ensure that busing remains a substantial component of the TDM Plan, Condition No. 13 of the Brentwood School Master Plan establishes that a minimum of 20% of the students on the East Campus arrive by bus or vanpool. Vanpools are not currently used by the School, but could offer a commuter option for potential bus routes that may not have the students to fill a school bus or may be routed on hillside streets where a school bus would be difficult to maneuver. The remainder of the students would commute by some combination of busing beyond 20 percent, carpooling, vanpooling, walking, etc. specified in a plan to be reviewed and approved by the Los Angeles Department of Transportation (LADOT) that ensures that no vehicle trips in excess of the Trip Cap occur, even with the increase in student enrollment.

An Average Vehicle Ridership (AVR) of 3.0 East Campus students is also required. This figure is calculated by dividing the total number of students in attendance by the number of vehicles

used to bring them to the East Campus. While the Trip Cap ensures that student, staff, and faculty trips do not increase during peak hours under the Brentwood School Master Plan, the AVR requirement and the busing requirement both ensure that overall student traffic is limited, even outside of peak hours.

The key to achieving the performance-based standard in the TDM Plan is enforcement. In 2000, a Zoning Administrator communication regarding the existing Conditional Use Permit indicated that enrollment figures had not been received and that there was evidence that students were parking in a nearby public parking lot. As such, extensive monitoring and reporting to LADOT is required to hold the Applicant responsible for maintaining the conditions of the Brentwood Master Plan. The TDM Plan is enforced through monitoring established through the year 2041, conducted at the Applicant's expense and in a manner, method, and frequency to be reviewed and approved by LADOT. An independent monitoring firm will conduct the monitoring and ensure that personnel monitor both the Sunset (Main) Gate and the Village Gate, as well as the Brentwood Village area to account for any offsite student pickups drop-offs within ¼ mile of the Sunset (Main) Gate, including the local public parking lots. Monitoring will include the use of video cameras. While the EIR allowed for a 5% increase in measured trips beyond the Trip Cap to account for fluctuations, in response to public comment, Condition No. 13 establishes that no such margin of error will be used and that the established Trip Cap will be a "hard" figure to establish violations if repeated.

A violation of the TDM Plan is defined by any of the following occurring: exceeding the Trip Cap or failing to meet the AVR requirement in more than two consecutive monitoring periods, or more than twice in a 12-month period; or by exceeding the Trip Cap by more than 10% or falling below an AVR of 2.7 in a single monitoring event. In the event of such a violation, LADOT would require that the Applicant submit an amended TDM Plan for approval that would ensure compliance with the Trip Cap and AVR requirement. In the event of a further violation after the TDM Plan has already been amended once, the Department of City Planning would initiate a Plan Approval process to reconsider the allowed uses and conditions on the East Campus, including enrollment, busing, or any other necessary steps to ensure compliance with the established Trip Cap and AVR requirement. Changes in the required plans are preferred to monetary penalties because if a violator is willing to pay, monetary penalties do not, by themselves, establish a nexus to actually decreasing vehicle trips. The larger school's potential for greater traffic is thus offset by the restriction to not increase vehicle trips.

Letters and comments from the public detailed a stringent proposal for limiting traffic and events at the Brentwood School, asking for conditions similar to those required of the nearby Archer School for Girls in the CUP for its expansion plan approved by the City Council in 2015. Among the conditions requested are an average vehicle ridership (AVR) on the East Campus of 3.0 riders per vehicle, a minimum bus ridership of 50 percent of enrolled students, three students plus driver in each carpool, separate trip caps for morning and afternoon/evening traffic, stringent monitoring, a parking reservation system, a school transportation coordinator, and limits on athletic competitions and special events. The TDM Plan proposed for the East Campus is also compared with the existing conditions imposed on the West Campus, which while not identical to Archer's, are structured in a similar traffic management plan, and which the letter notes the Brentwood School has successfully complied.

The suggestions from these letters were carefully considered by Staff. Some of the suggestions were incorporated into the conditions for the Brentwood Master Plan, such as the AVR requirement of 3.0, and some of the compliance details including a parking reservation system and a school transportation coordinator. Carpool minimums of three students plus driver are

#### CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

already being implemented on the East Campus and are required as a condition of the Brentwood School Master Plan. It must be understood, however, that despite the proximity of the two schools, the situations that inform the traffic management requirements of the Brentwood School and the Archer School for Girls are unique. Archer's expansion plan, in particular, involved no increase in enrollment, but a substantial increase in the athletic and performing arts facilities on campus. Furthermore, Archer's campus, particularly the portions of the campus in which athletic competitions and special events are to take place, is more closely integrated with the surrounding residential neighborhood, and thus the purpose of the conditions was to control both traffic and noise. The Brentwood School's expansion, on the other hand, is concentrated away from the residential neighbors on the Layton Drive side of the campus, and is focused instead primarily on restricting traffic while maintaining the noise restrictions and a noise environment near its residential neighbors similar to existing conditions.

The structure of the Brentwood School plan differs from Archer's in that it primarily uses a performance-based standard rather than specifying minimum levels of AVR and bus ridership. Performance-based standards are accepted practice under CEQA provided that the standard can be feasibly achieved and enforced. The TDM Plan required under the Brentwood School Master Plan is not intended to restrict the School to a particular set of numerical thresholds for different types of transportation, but instead provide a level of flexibility between several possible sets of methods in achieving its net zero-trip standard. When the School develops the specifics of its TDM Plan, they will take into consideration the locations of student's houses, the logistics of bus or vanpool routing, and possible secondary effects that the busing, vanpool, and carpool systems may have on each other. Thus, it is important for the Brentwood School to have flexibility in designing its TDM Plan, and ultimately the most important part of the TDM Plan is the result, zero net new trips, despite an enrollment increase from 695 to 960 students, rather than the precise combination of methods used to achieve this result.

It should be noted that while Archer's required busing level was increased from 50 percent to 76 percent with the approval of its expansion plan, this was below the level of busing Archer was already achieving, between 80 and 85 percent, demonstrating the feasibility of the requirement. Similarly, the busing levels required of the Brentwood School are also already being achieved by the school, demonstrating their feasibility while establishing a base from which further progress can be made. Achieving a net zero trip standard on the East Campus also means that holding the number of peak hour trips equal while raising the number of students from 695 to 960 results in a trip rate per student 28 percent lower than today<sup>1</sup>. Therefore, Staff recommends approval of the traffic management conditions of the East Campus as conditioned.

Pursuant to Footnote 10 in the Brentwood–Pacific Palisades Community Plan, Sunset Boulevard cannot be widened in this area to increase capacity. Integral to the design of Phase I, however, is a relocation of the primary entry gate to the East Campus (the Sunset Gate) on Barrington Place to a new location approximately 120 feet east of its current location, farther from Sunset Boulevard and still along Barrington Place. This allows for more queueing along Barrington Place, a lightly traveled local commercial street, rather than backing up onto heavily traveled Sunset Boulevard. This should ease congestion along Sunset Boulevard even while the number of vehicle trips is kept the same, and Staff recommends approval of this design feature.

<sup>&</sup>lt;sup>1</sup> Including all vehicle trips to and from the campus, not just those involving student commuters, results in a future scenario with 1,521 trips for 960 students, or 1.58 trips per student, which is 28 percent lower than the existing rate of 1,521 trips for 695 students, or 2.19 trips per student.

#### CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

One member of the public commented that the timing of the traffic signals at the interchange between Sunset Boulevard and I-405 be adjusted to minimize congestion along Sunset Boulevard near the School. The City of Los Angeles does not have the authority to adjust those traffic signals; those are under the jurisdiction of the California Department of Transportation (Caltrans), but in light of the change in queuing planned at the East Campus entrance, Condition 33 has been added for the Applicant to inform Caltrans of the change in street configuration and suggest that it may investigate adjustment of the traffic signals there.

The West Campus is keeping its enrollment at 300 students, and is therefore not expected to increase vehicle trips with the maintenance of traffic management measures and conditions equivalent to the existing ones. The existing traffic management conditions on the West Campus include a requirement for an Average Vehicle Ridership (AVR) of 2.5 West Campus students per vehicle arriving in the morning, achieved through a combination of busing and carpooling. Monitoring is conducted once per semester by an independent traffic counting company that reports results to LADOT. The latest Plan Approval for the West Campus, in 2006, indicates that the School had surpassed the 2.5 AVR requirement and had achieved an AVR of 3.0, with busing of approximately 54% of West Campus students, despite the lack of any minimum busing in the existing CUP. As such, the Brentwood School Master Plan maintains these conditions with enrollment figures remaining the same, and requires a minimum AVR of 3.0 and minimum busing figure of 40 percent of the enrolled students. Conditions for the West Campus also reduce the impact of traffic on the surrounding residential neighborhood by staggering student dropoff times and prohibiting vehicles exiting the premises from turning north into the residential neighborhood unless the families or staff members so turning are residents of the neighborhood north of the West Campus. Staff thus recommends approval of the traffic management conditions for the West Campus.

# Special Events

The number, type, and attendance of special events is required to not increase under the Proposed Project, even with the increase in anticipated attendance. Events at both the East and West Campuses are fixed at what events were held during the 2015-2016 school year, as attached in Exhibits 1 and 2, a total of 141 annually on the East Campus and 76 annually on the West Campus. This uses the same principle as the TDM Plan described above in establishing a net zero increase standard, but for events, rather than vehicle trips. The schedule detailing days, times, types, and attendance levels of events is conditioned to not be changed except through a Plan Approval process. Noise and traffic impacts from events should thus be similar to what is existing, with the larger school's potential for greater events being offset by the restriction to not increase those events. Furthermore, enforcement methods such as a parking reservation system will be used to ensure that traffic from events remains at current levels or is improved. Staff thus recommends approval of the limitations on Special Events found in the conditions of the Brentwood School Master Plan project.

# Private Covenants

The Brentwood School currently maintains a private covenant with the Brentwood Homeowners Association (BHA) limiting its operations and traffic generated. Many members of the public commented on this covenant, some praising the engagement with the community and success of the covenant in achieving its goals. Other public commenters noted that the covenant is only between the School and a single homeowners association, when residents from multiple homeowners association areas are potentially affected by the School's operations and its associated traffic. The Transportation Demand Management Plan proposed by the School was inspired by similar transportation management elements of the covenant with the BHA.

The City of Los Angeles, however, is not party to this agreement or any covenant between private entities such as a private school and private homeowners associations. Therefore the City takes no position on the merit of any existing or future covenant the Brentwood School makes with any private local organizations, including the BHA. Furthermore, while the structure of the TDM Plan may have been inspired by the BHA covenant, enforcement mechanisms for the TDM Plan required under the proposed Brentwood School Master Plan project cannot rely on the covenant, the BHA, or on monetary penalties managed by the BHA. Enforcement mechanisms of the TDM Plan therefore rely on agencies within the jurisdictional authority of the City of Los Angeles, specifically, the Department of City Planning and the Department of Transportation.

# <u>Noise</u>

All significant and unavoidable impacts identified in the EIR fall within the Noise (including vibration) impact category, and all are associated with construction of the Project. As indicated in the EIR, the Project is considered to have a temporary significant vibration impact with regard to human annoyance from on-site construction activities. Project-related vibration impacts along the haul routes from off-site construction trucks would have a less than significant impact with respect to building damage, but are considered to have a temporary and intermittent but significant and unavoidable impact with regard to human annoyance. Cumulative noise impacts from construction traffic would also be significant if construction of the Project overlaps with the Archer Forward project and construction traffic from the two projects use the same routes. As noted in the EIR, however, the Project will seek to utilize the VA property for East Campus construction traffic and one of two alternative routes to and from the West Campus to avoid potential cumulative impacts.

As noted in the EIR, noise- and vibration-related impacts are significant and unavoidable. Nevertheless, all feasible project design features to attenuate construction noise were incorporated into the Project. Project Design Features include PDF N-1, which limits construction activity to between the hours of 8:00 A.M. and 4:00 P.M., Monday through Saturday, except for infrequent activities such as concrete pours that must be completed within a single workday. Truck hauling and heavy equipment and materials deliveries are limited to between the hours of 9:00 A.M. and 2:30 P.M. No construction activity will occur on Sundays or holidays.

Project Design Feature PDF N-2 requires a Construction Noise Management Plan to be implemented throughout any construction activity, which shall include a number of practices designed to reduce the amount or impact of construction noise, including notification of neighbors, a prohibition on the use of pile drivers and vibratory rollers, rules regarding the location and use of various types of noise-generating equipment, and requirements for the use of sound-attenuating noise curtains along the boundaries of the School property and several sensitive neighboring properties, including residences and the St. Martin of Tours Catholic Church grounds. These features apply to both the East and West Campuses. Nevertheless, the significant and unavoidable impacts related to noise and vibration will require a Statement of Overriding Considerations for any Project approval.

# Site Plan Review and Vesting CUP Determinations

#### CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

Site Plan Review is required for the development of non-residential floor area of 50,000 square feet or more. Its purpose is to promote orderly development, evaluate and mitigate significant environmental impacts, and to ensure that projects are properly related to their sites, surrounding properties, traffic circulation, and their environmental settings. The Project is also seeking a Determination pursuant to Section 12.24 F of the LAMC to permit height and setback modifications in conjunction with the Vesting Conditional Use Permit.

Improvements on the East Campus will retain the existing general layout and circulation of the School, with vehicular travel generally moving down from the Sunset Gate to the arroyo floor and then exiting the property to the southeast, into the VA property, but with two critical differences. First, the relocation of the Sunset Gate will allow for queuing to take place on local commercial street Barrington Place rather than along congested Sunset Boulevard. Second is that instead of traveling on the surface, vehicles will be directed into a single-level covered parking structure generally in the western half of the site, on top of which will be a podium level with the Middle School Athletic Field and the Middle School Classroom Building. This will reduce pedestrian/vehicle conflicts on this portion of the campus. Vehicles will then travel through an open-air plaza, mixing with student pedestrians as they do now, before exiting the school grounds into the VA property. This will occur in Phase I. Existing surface parking lots on the eastern edge of the East Campus will be replaced with buildings in Phase II (Northeast Classroom Building) and Phase III (Upper School Gym). With the ground floor of the Upper School Arts Building (Phase IV) also being devoted to covered parking, all surface parking lots will be removed from the East Campus and replaced with covered structures partially built into the natural slope. Thus, vehicle circulation under the Brentwood School Master Plan will be improved under the Brentwood School Master Plan and Staff recommends approval of the Site Plan.

In evaluating the site design and height modifications, it should be noted that heights of buildings as measured by the Municipal Code do not necessarily reflect how those buildings would appear from nearby public streets or neighboring residences. Neither campus has flat topography. The East Campus has a lower-elevation arroyo running generally from Sunset Boulevard to the Veterans Administration property, with the edges of the East Campus bordering residential uses to the north and commercial uses to the south being at higher elevations. The West Campus has a simpler slope, rising gradually from the southwest corner of the property to the northeast corner. Thus the Middle School Classroom Building on the East Campus, being built partially into the natural slope, will be 77 feet in height, four stories over a parking garage when measured from the center of the East Campus, but appear to be three stories tall from its frontage along Barrington Place, and the Upper School Arts Building will be 78 feet, 5 inches in height when measured from the center of campus, but will appear approximately 20 feet shorter from the adjoining properties, all of which are the rear sides of commercial properties. The proposed Upper School Gym is 68 feet in height but, due to the topography of the site, has the same parapet elevation as the adjacent Northeast Classroom Building, 28 feet in height but with a base on a higher hill. Thus, the topography of the site allows the taller buildings in the northern portion of the East Campus to nevertheless have rooflines consistent with two-story homes on neighboring residential properties. On the West Campus, the New Classroom Building will, similarly, be 54 feet in height and three stories when measured from the west, and using the natural slope will appear as two stories when viewed from the east. The Saltair Annex, with a Municipal Code height of 38 feet, reaches that height at its central stairwell, otherwise having a 34-foot parapet; this too would be further decreased by a natural slope when viewed from the adjoining residential property line to approximately 24 feet in height, well below the 36-foot limit and consistent with the height of a two-story residential structure. Therefore the height modifications requested for the Vesting Conditional Use Permit would not create any adverse impacts on the Brentwood School's neighbors, and Staff recommends approval.

Residences to the northeast of the East Campus, at 165 S. Layton Drive and 235 S. Woodburn Drive, will have a 45-foot landscaped buffer between their property lines and two new buildings, the Northeast Classroom Building and the Upper School Gym. The Upper School Gym and the Upper School Arts Building will both have zero-foot yards against the VA property; this property adjoins the school grounds and is used by the school for athletic facilities and vehicle circulation, so the lack of a setback is appropriate for an area whose use is integrated into the East Campus's use. The Upper School Arts Building also has a zero-foot yard against the rear of several commercial properties along Barrington Place, which would match the commercial zero-rear-yard setbacks. A zero-foot yard is also requested along Sunset Boulevard to allow the covered parking structure and athletic field to be built, but due to the higher elevation of Sunset Boulevard, the parking would not be visible from the roadway, and viewers from the public rightof-way would still have a largely unobstructed view across the Middle School Athletic Field beyond the landscaping and mesh-like sports netting. The remaining property boundary to the north would have a ten-foot setback to the residential properties there and would not be the site of any new buildings constructed under the Plan except for the rebuilt Middle School Athletic Field at podium level. Thus the proposed modifications from the standard setback conditions will not conflict with the East Campus's neighbors and Staff recommends approval of the Site Plan.

A design alternative to build the East Campus athletic field to California Interscholastic Federation regulations is being considered and has been fully evaluated in the EIR as a contingency in the event that the Veterans Administration no longer allows the Brentwood School the use of the athletic facilities on its property, which is under the jurisdiction of the federal government and not under the control of the City of Los Angeles. The design alternative would have virtually the same effect on site design and impacts as the non-regulation Middle School Athletic Field described in the main proposal. The Regulation Athletic Field would extend somewhat further to the north, necessitating more grading and export, and also extend further to the east, necessitating a reconfiguration and reduction in square footage for the new Middle School Gym and Upper School Arts Building, which would not alter any conclusions regarding impacts of the construction or operation of the East Campus.

The West Campus would also see its general layout preserved, with Phase I consolidating the functions of several smaller buildings on the site, which would be demolished, into one new building, the Saltair Annex. The Saltair Annex, along with its underground parking structure, would maintain the 29-foot, 3-inch setback from the northern property line that the existing Arts and Athletics Building has, which will remain under the Plan. The new parking structure underneath the Saltair Annex will expand the available parking on site but will be accessed through the existing underground parking structure underneath the Arts and Athletics Building. Thus it will not alter any traffic pattern. In Phase III, the New Classroom Building and its attached Admissions Building will replace the existing Main Classroom Building in generally the same location, which will in turn maintain the layout of the central courtyard of the West Campus, which will have grassy athletic fields and play areas. Thus while many of the West Campus's buildings would be demolished and replaced under the Brentwood Master Plan, the layout of the West Campus and the relationships of the buildings to each other and the adjacent properties would remain consistent with the existing conditions, and Staff recommends approval of the Site Plan.

# **Determination**

#### CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

The Applicant is requesting a determination pursuant to Section 12.24 X.28 of the LAMC to exceed the limitations of the Baseline Hillside Ordinance (BHO) pursuant to Sections 12.21 C.10(f)(2)(iii) and 12.21 C.10(f)(3)(i), to permit 5,000 cubic yards of grading and export in connection with the construction of the New Classroom Building and Admissions Building on the West Campus. The West Campus is located within the Hillside Area subject to the BHO, although areas immediately adjacent to the West Campus's southern boundary are not within the Hillside Area and the West Campus site has a moderate natural slope. Although the 5,000 cubic yards of grading requested exceeds the BHO limit of 1,400 cubic yards of grading, under the authority of Section 12.24 X.28, the Zoning Administrator may issue a determination to allow grading to exceed the BHO limits to allow grading quantities up to a numerical value in cubic yards of five percent of the site's lot area in square feet, plus 500 cubic yards. For the West Campus, this calculation results in a maximum determination of approximately 7,900 cubic yards. Therefore, the 5,000 cubic yards of grading and export being requested do not exceed the maximum threshold of the Zoning Administrator's authority to permit.

The grading limitations of the BHO were intended primarily to address out-of-scale single-family homes, although the limits do also apply to a private school such as the Brentwood School. Nevertheless, the excavations being requested are for the construction of buildings that would replace existing buildings in generally the same locations, and therefore the requested grading would not lead to a significant alteration of the existing natural terrain. Furthermore, the Proposed Project includes Mitigation Measure TR-7 forbidding hauling from taking place during the morning or afternoon peak traffic hours, and Mitigation Measure TR-2 requiring a Construction Mitigation Plan. Haul trucks will be routed onto streets within the Hillside Area for a limited time, given that the project fronts onto Sunset Boulevard, outside the Hillside Area. The requested 5,000 cubic yards of grading and export would thus have a minimal impact on the Hillside Area, would not greatly alter the existing natural terrain, and is allowable under the authority of the Zoning Administrator, therefore Staff determines that it is appropriate for the determination to be made to allow 5,000 cubic yards of grading/export on the West Campus.

# <u>Adjustment</u>

The adjustment requested pursuant to Section 12.28 of the LAMC consists of relief from LAMC Section 12.22 C.20(f) prohibiting fences in the front yard exceeding eight feet in height to allow the erection of protective sports netting along the portion of the Sunset Boulevard perimeter of the East Campus adjacent to the Middle School Athletic Field. This netting is proposed to be permanently erected to 20 feet in height, with temporary netting 50 feet in height during football season. This is essential to maintain the safety of pedestrians, bicyclists, and persons traveling in automobiles on Sunset Boulevard, as the use of the adjacent Athletic Field for sports activities would create a situation in which balls are likely to occasionally leave the school grounds and intrude on the public right-of-way. A ball entering a busy roadway could easily create an unsafe situation that leads to a traffic collision or an injury to bicyclists or pedestrians. The restriction of fences, gates, and walls to eight feet remains appropriate in most circumstances, but in this case would create a potentially dangerous situation. Therefore, the adjustment to allow the over-height sports netting would be appropriate to maintain public safety and Staff recommends its approval.

# Conditional Use for a Childcare Facility

Pursuant to Section 12.24 W.51 of the Municipal Code, a Conditional Use Permit is being sought by the Project to permit the continued use of a child care facility on the West Campus for use by the employees of the School. The Brentwood School has operated an employee

childcare facility on the West Campus since 2010, which would be relocated to within the new Saltair Annex building. The total capacity of the childcare facility is conditioned to 15 children of employees, operating daily Monday through Friday from 7:15 A.M. to 4:30 P.M. and will operate according to the State licensing regulations for childcare facilities. Access will be through a circular driveway accessed from Saltair Avenue used as a child pickup and drop-off area, with four parking spaces provided to prevent queuing from spilling over into the public right of way. No complaints have been received regarding the existing childcare facility, and as an extension of an existing use, this would not be expected to create any new impacts or conflicts, and would provide an essential service for School employees, reducing vehicle trips that would otherwise be made by employees using off-site childcare facilities. Therefore, Staff recommends approval of the conditional use for an employee childcare facility for 15 children on the West Campus.

# **Conclusion**

Based on the analysis of the Brentwood School Master Plan's EIR, mitigation measures, and in conjunction with conditions of approval included herein, significant unavoidable impacts would remain in Noise (construction vibration–human annoyance); and Noise (construction haul routes vibration–human annoyance); with cumulatively considerable impacts in Noise (construction traffic).

However, based on the analysis, findings, and Statement of Overriding Considerations presented in this report, staff recommends that the City Planning Commission conditionally approve the requested entitlements, including use, operational, environmental and administrative conditions, and that the continued use of the Brentwood School is appropriate for both of its respective locations. Improving the School's functionality will result in benefits to the surrounding neighborhood as more queueing would be available on Barrington Place, easing congestion on Sunset Boulevard. Furthermore, vehicle trips would remain the same despite the increase in student enrollment on the East Campus, representing a 28 percent decrease in trips per student, and new compliance conditions would provide stronger tools for the enforcement of traffic management conditions.

Further, the issue of traffic congestion is endemic to the West Los Angeles area, particularly along Sunset Boulevard. Consequently, while the Brentwood School is one of many contributors to the existing congestion in the area, the Brentwood School Master Plan ensures that the school may grow without increasing the traffic it generates. The Proposed Project will implement a stringent transportation demand management plan (TDM Plan) which will ensure that there is no net increase in vehicle trips from the Project and enforce this condition. Therefore, the Department of City Planning recommends that the City Planning Commission approve the requested entitlements to allow more students to attend the Brentwood School with a broader range of class offerings in modernized classrooms with updated technology.

# CONDITIONS OF APPROVAL: EAST CAMPUS

# A. <u>Vesting Conditional Use Conditions</u>, Sec. 12.24 U, LAMC.

Notwithstanding any other provisions of the LAMC to the contrary, the School shall be permitted subject to the following conditions of approval:

- 1. **Site Plan**. The use and development of the subject property shall be in substantial conformance with the site plans and elevations labeled Exhibit A, stamped, signed and dated September 14, 2015, attached to the subject case file. Minor deviations may be allowed in order to comply with provisions of the Municipal Code and the conditions of approval.
- 2. Floor Area. The total building floor area on the subject property shall be calculated pursuant to the Floor area definition contained in Section 12.03 of the LAMC, and shall be limited to 364,459 square feet, including limitations on the following newly constructed buildings:
  - a. Middle School Classroom Building: 85,000 square feet.
  - b. Northeast Classroom Building: 12,000 square feet.
  - c. Upper School Gymnasium Building: 75,000 square feet.
  - d. Middle School Gymnasium: 35,000 square feet.
  - e. Upper School Arts Building: 60,000 square feet.
- 3. **Use and Enrollment.** The use of the subject property shall be limited to grades 6 to 12. The authorized use shall be conducted at all times with due regard for the residential character of the surrounding area and the right is reserved to the City Planning Commission to impose additional corrective conditions if, in its opinion, such conditions are necessary for protection of persons using the school or residents of the area. The maximum enrollment on the East Campus shall be phased in as follows:
  - a. Prior to completion of Phase I: 695 students;
  - b. Within 1 year of completion of Phase I: 826 students;
  - c. Within 2 years of completion of Phase I: 885 students;
  - d. Within 3 years of completion of Phase I: 927 students;
  - e. More than 3 years after completion of Phase I: 960 students.
- 4. Phased Development. Construction shall occur in the following phases:
  - a. Phase I: Removal of a portion of the South Parking Lot; Construction of the Middle School Classroom Building and Middle School Classroom Building Parking Garage; Expansion of Temple Hall; Replacement of Middle School Athletic Field; Renovation of existing Gymnasium/Classroom Building;
  - b. Phase II: Removal of the Academic Village Building, the remainder of the South Parking Lot, and a portion of the North Parking Lot; Construction of the Northeast Classroom Building and Middle School Gymnasium;
  - c. Phase III: Removal of the Pool, Lower Reserved Lot, and remainder of the North Parking Lot; Construction of the Upper School Gymnasium Building; and

- d. Phase IV: Removal of the Gymnasium/Classroom Building; Construction of the Upper School Arts Building and Upper School Arts Building Parking Garage; Expansion of the Science/Library/Theater Building.
- 5. Access. There shall be no vehicular ingress or egress to Sunset Boulevard. Primary vehicular, bicycle, and pedestrian ingress and egress shall be limited to the "Sunset Gate" or "Main Gate" at 100 S. Barrington Place and the "Village Gate" off of Barrington Place opposite Chayote Street. The location of the Sunset Gate shall be relocated in accordance with the approved site plans attached as Exhibit A and dated September 14, 2015. The gate at Layton Drive may see limited use; see Condition 25 for Layton Gate access conditions. Access through the remainder of the Veterans Administration property is at the discretion of the Veterans Administration.
- 6. **Height**. The height of all proposed new school buildings and structures on the subject property shall not exceed the following maximum heights as conditioned herein and defined by Section 12.03 the Los Angeles Municipal Code:
  - a. Middle School: 77 feet;
  - b. Middle School Gym: 60 feet;
  - c. Northeast Classroom Building: 28 feet;
  - d. Upper School Gym: 68 feet; and
  - e. Upper School Arts Building: 78 feet, 5 inches.
- 7. Setbacks. The following minimum setbacks shall be observed:
  - a. Front yard from Sunset Boulevard: 0 feet;
  - b. Side yard from Barrington Place and adjacent properties on Barrington Place: 0 feet;
  - c. Side yard from Layton Drive and adjacent residential properties on Layton Drive and Woodburn Drive: 10 feet, overlapping with a 45-foot landscape buffer facing the properties at 165 S. Layton Drive and 235 S. Woodburn Drive; and
  - d. Rear yard from the Veterans Administration property: 0 feet.
- 8. **Mechanical Equipment**. All mechanical equipment on the roof of new buildings, such as air conditioning units and other related equipment, shall be fully screened from view of adjoining lots, or public right-of-way.

# 9. Use Restrictions.

- a. <u>Renting/Leasing</u>. None of the private school facilities shall be rented, leased, or otherwise permitted to be used for any purpose other than as a private co-educational school for students in the 6<sup>th</sup> through 12<sup>th</sup> grades of the school itself, or joint use by other schools involving school-related activities or events.
- b. Gymnasium as Auditorium. No gymnasium shall be used as an auditorium. In view of the large capacity of the science lecture hall (320 seats), in no event shall any gymnasium's movable seating area and the science lecture hall be used simultaneously for a combined capacity exceeding three persons for each fully improved off-street parking space being maintained on the school site and the Veterans Administration property.
- 10. Hours of Operation. The Applicant shall comply with the following hours of operation:

- a. Instruction shall be permitted between 8:00 A.M. and 3:00 P.M., Monday through Friday.
- b. Regular afterschool activities such as sports practices, performing arts rehearsals, club meetings, etc. shall be permitted from 3:00 P.M. to 8:30 P.M., Monday through Friday.
- c. Normal hours for the administration buildings shall be from 8:00 A.M. to 5:00 P.M.
- d. Administration, maintenance, and security personnel may be on the campus at any time.
- e. Special Events: Other activities and events, including performing arts performances, back to school nights, sports competitions, etc., and preparation and cleanup for these activities, shall be permitted within the following times:
  - i. Monday through Thursday: 7:30 A.M. to 11:30 P.M.
  - ii. Friday: 7:30 A.M. to 12:30 A.M.
  - iii. Saturday: 7:00 A.M. to 12:30 A.M.
  - iv. Sunday: 8:00 A.M. to 9:00 P.M.
- f. Other than sports competitions, special events shall be restricted to the day, start and end times, attendance, and general type of event shown in the "BWS East Campus Events List 2015-2016 by Category with Estimated Attendance" table attached as Exhibit 1. This list may only be amended through the Plan Approval process detailed in Condition 29.
- g. Except for emergencies, the School shall not permit any meetings on campus of more than 20 people who are not students, faculty, or staff before 9:30 A.M. on any weekday.
- h. Each semester, the School shall post its schedule, including any sports competitions or special events, on its website calendar. Any rescheduling, including emergency situations, sports competitions not anticipated at the beginning of a semester, etc. shall be posted on the website calendar at least 30 days prior to the event, unless the change is made within that time period, in which case posting shall be made as soon as possible.
- 11. **Parking (vehicles)**. As shown on the Site Plan labeled Exhibit A and dated September 14, 2015, the minimum number of parking spaces upon the completion of each phase shall be as follows:
  - a. Phase I: 210 spaces in the Middle School Parking Garage, 11 of which shall be electric car ready, and 31 other spaces shall be wired for future electric use.
  - b. Phase II: 223 spaces in the Middle School Parking Garage, 12 of which shall be electric car ready, and 33 other spaces shall be wired for future electric use.
  - c. Phase IV: 223 spaces in the Middle School Parking Garage, 82 Spaces in the Upper School Arts Building Garage. Of the 305 total garaged spaces, 16 shall be electric car ready and 45 shall be wired for future electric use.
- 12. **Parking (bicycle)**. In accordance with Section 12.21.A.16 of the LAMC, the minimum number of bicycle parking spaces to be provided in prominent, accessible locations shall be 4 short-term spaces per classroom and 1 long-term storage space per 10 classrooms (with a minimum of 2) upon the completion of each construction phase.
- 13. **Transportation Demand Management Plan**. The Applicant shall prepare an East Campus TDM program (TDM Plan) to achieve a zero net increase in School-related vehicle trips during the peak hours. This expanded TDM Plan shall be submitted to LADOT for review and approval. The components shall include:

- a. An Average Vehicle Ridership (AVR) of 3.0 East Campus students per vehicle on the East Campus shall be maintained. Monitoring shall take place at the Applicant's expense, once per semester over periods of three consecutive days, on dates determined by LADOT and using LADOT-approved methods. Compliance shall be demonstrated in the Transportation Management Compliance Report set forth in Condition 18(a).
- b. Vans/buses shall be used to transport at least 20 percent of the student enrollment in the morning and afternoon on a daily basis. Vans/buses shall be defined as any vehicle capable of safely carrying 9 or more students in addition to the driver. Compliance shall be demonstrated in the Transportation Management Compliance Report set forth in Condition 18(a). The School shall contract with a licensed transportation provider and offer routes designed to maintain bus usage at 20 percent of the enrollment. To the extent feasible, the transit provider shall utilize transit routes to and from the campus which minimize congestion on major and secondary routes, to the satisfaction of the Department of Transportation. The licensed transportation provider shall be informed by the School in a letter regarding the rules regulating School transportation and parking.
- c. Carpool Program.
  - (1) Distribute information to parents explaining the carpool program, including family names and phone numbers so that parents can identify potential carpool opportunities.
  - (2) Require parents and students participating in the carpool program to sign a contract for carpool program participation.
  - (3) Require parent driven carpools to consist of a minimum of 3 students in each vehicle.
  - (4) Restrict student driven carpools to 4 or more students in each vehicle. Student drivers are limited to only 11th and 12 graders, who comply with §12814.6 of the California Vehicle Code restrictions on a provisional license.
  - (5) Provide preferred parking locations for carpool vehicles.
- d. The School shall post two traffic monitors, one at each Barrington Place driveway, between 7:30 A.M. and 9:00 A.M., Monday through Friday, when classes are held. The monitors shall observe compliance with the Transportation Management Program and report any violations to the School administration. The monitors shall also observe and report to the School administration any unauthorized off-campus drop-offs that are within the range of visibility.
- e. The School shall adopt rules to discourage drivers from dropping off or picking up students off campus in the environs of the school for school purposes.
- f. Flexibility: In addition to the requirements listed in Conditions 13(a) through (e), the School has the flexibility to use a variety of methods to achieve a zero net increase in School-related vehicle trips during the peak hours, as outlined in the TDM Plan submitted to LADOT for review and approval.

The TDM Plan, as approved by LADOT, shall ensure zero net increase in trips over the Final Trip Cap, using one or more of the following methods:

- i. Increasing the percentage of students on school buses;
- ii. Increasing the number of students per carpool;
- iii. Implementing a student vanpool program, with remote pickup and drop-off locations;
- iv. Increasing bicycling and walking to school by students and employees;
- v. Increasing staff and faculty carpooling;
- vi. Instituting an employee vanpool program;
- vii. Requiring employees to arrive and/or depart outside the peak traffic hours;
- viii. Increasing the use of public transit, including buses and the Expo Line, including instituting a shuttle service to and from the Expo Line;
- ix. Requiring carpooling or busing to on-campus special events or athletic competitions;
- x. Scheduling certain on-campus special events or athletic competitions to start after 7:30 p.m. or moving them to weekends to avoid peak hour traffic.
- xi. Providing incentives to faculty, employees, visitors, vendors, parents, and students for the use of carpools, vanpools, buses, and other non-personal vehicle arrival;
- xii. Requiring Brentwood School to enter into an agreement with parents and students to comply with relevant TDM measures.

# g. Final Trip Cap Calculation

i. Initial Trip Cap

The initial trip cap on all vehicle trips to and from the East Campus between the hours of 7:30 A.M. and 8:30 A.M. and 3:00 P.M. and 6:00 P.M. shall be 4,563 total trips (the Initial Trip Cap) as counted over a period of three consecutive weekdays (Tuesday, Wednesday, and Thursday) (i.e., a daily average of 1,521 trips). This is based on semiannual traffic counts taken in accordance with the monitoring procedures set forth below in Condition 13(h) over three consecutive semesters, reviewed and approved by LADOT.

ii. Supplemental Trip Cap Count

The Applicant shall retain a qualified, independent traffic data collection firm (traffic consultant) at its expense, subject to LADOT approval, to conduct additional traffic surveys in accordance with the monitoring procedures set forth below in Condition 13(h). The traffic consultant shall conduct three consecutive semiannual traffic surveys over three consecutive semesters that count all inbound and outbound pedestrian and vehicles at the East Campus driveways between 6:00 P.M. and 7:00 P.M. over three consecutive weekdays on Tuesday through Thursday (Supplemental Traffic Counts), as these three days generally have the most consistent school attendance.

iii. Final Trip Cap

The Final Trip Cap shall be the sum of the Initial Trip Cap and the average of the Supplemental Traffic Counts.

Both the Initial and Final Trip Caps shall cover all trips to and from the East Campus, including students, faculty, staff, vendors, and visitors, during the covered periods. Students who are dropped off in the vicinity of the East Campus or who park in any off campus location and walk into school shall count as two trips (one inbound and one outbound).

# h. Future Monitoring

Subsequent monitoring shall be conducted at the Applicant's expense, in a manner, method, and frequency approved by LADOT to demonstrate that the total trips to and from the East Campus from 7:30 A.M. to 8:30 A.M. and from 3:00 P.M. to 7:00 P.M. do not exceed the established Final Trip Cap. The monitoring shall continue through 2041 and be consistent with the methodology in Condition 13(h).

All monitoring reports and back up video files shall be made available to LADOT for review.

# i. <u>Trip Count Methodology</u>

The Applicant shall implement a trip count methodology for all future monitoring, in a format that is acceptable to LADOT, that includes the following:

- (1) The Applicant shall retain an independent monitoring firm to conduct the monitoring and shall ensure that there are a sufficient number of personnel to monitor the Sunset (Main) Gate and the Village Gate, as well as the Brentwood Village commercial area to account for any offsite student dropoffs or pick-ups within ¼ mile of the Sunset (Main) Gate. The monitoring locations shall be established and mapped for consistency from count to count, and written instructions and responsibilities shall be provided to each assigned personnel;
- (2) Count line locations shall be established and mapped for consistency at both the Sunset (Main) Gate and the Village Gate.
- (3) Monitoring shall also include the use of video cameras, and the locations and angles of which shall be established and mapped for consistency from count to count. At each monitoring location, two video cameras shall be installed and used to ensure that full video files are available in the event that technical difficulties affect one of the cameras. The monitoring firm shall review the video files to verify the accuracy of human counts.
- (4) Counts shall be noted and reported in 15-minute intervals during the count period.
- j. <u>Trip Cap or AVR Violations</u>

A violation of the TDM Plan shall occur if, in more than two consecutive monitoring periods, or more than two times in a 12-month period, either the monitored trip count to and from the East Campus exceeds the Final Trip Cap or the AVR requirement of 3.0 is not met; or if in a single monitoring event the monitored trip count exceeds the Final Trip Cap by more than 10% or the AVR is measured at 2.7 or below. In the event of a violation, LADOT shall require the applicant to submit an amended TDM Plan ensuring that the Final Trip Cap shall not be exceeded. If the Final Trip Cap is exceeded or the AVR requirement of 3.0 is not met after the TDM Plan has been amended once, LADOT shall inform the Department of City Planning. The Department of City Planning shall then initiate a Plan Approval process to reconsider the allowed uses and conditions on site, including student enrollment, required student busing, or any other necessary conditions to ensure compliance. The Department of City Planning shall also prepare subsequent environmental review as may be required under, and consistent with, CEQA.

# 14. Transportation and Parking Management Requirements for Athletic Competitions and Special Events.

- a. The School shall develop and implement an Event Parking and Transportation Management Plan that shall include a parking reservation system. The Plan shall include additional measures such as: attendant-assisted parking, off-site parking, busing for visiting schools, and temporary increases in traffic management and parking personnel as needed and other measures. The School shall submit the Plan to the Department of Transportation prior to the issuance of the first Certificate of Occupancy. The Plan may be modified to incorporate new technologies or techniques in parking and transportation management.
- b. The approved Plan shall be provided to the Department of City Planning, the Council Office, Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, the Residential Neighbors of the Brentwood School, and all residents immediately abutting and adjacent to the School. A copy of the Plan shall be provided on a designated page or link within the School's website for community information purposes. In the event of approval of any modifications to the Plan as described in Condition 29, the Plan as modified shall be provided to the groups listed above and updated on the School's website.
- c. The Plan shall include a parking reservation system designed to implement the attendee limits in Condition 10(f) for special events and a limit on athletic competition attendance consistent with existing attendance levels. While the details of the parking reservation system shall be set forth in the Plan, it will provide a parking reservation system for those special events that are subject to the limits in Condition 10(f). Guests seeking to attend special events without a parking reservation shall be denied access to the campus. The Department of Transportation may audit the parking reservation system at any time.
- d. While the details of the parking reservation system shall be set forth in the Plan, it is expected to be a mobile application or another technology or technique that shall provide information regarding the rules regulating School transportation and parking. The system shall provide off-site parking information and shuttle information as applicable to that athletic competition or special event. The system shall include a reporting capability so that logs can be generated regarding the issued parking reservations.
- e. Prior to the beginning of each Academic Year, the School shall inform other schools that will be participating in athletic competitions of the rules regulating School transportation and parking, including the parking reservation system. A copy of the rules regulating School transportation and parking shall be provided on a designated page or link within the School's website for community informational purposes. Prior to the first Certificate of Occupancy under the Brentwood School Master Plan, the School shall inform representatives from the other schools that will be participating in athletic competitions at the School about the rules regulating School transportation and parking.

- f. The Plan shall provide that off-site parking for vehicles in excess of the East Campus capacity are prohibited from parking at the Barrington Village Public Parking Lot and on residential streets within 500 feet of the School. To enforce this prohibition, only students, faculty, staff, and guests with a pre-issued Walking Pass, Bicycle Pass, or Transit Pass, as discussed in Condition 17, may be permitted to walk onto the campus.
- g. The Plan shall provide that where an athletic competition or special event at the East Campus is expected to attract more than the permitted number of cars per Exhibit 1, that off-site parking for vehicles in excess of those limitations shall be provided at offsite parking locations which the School may secure, but not at the Brentwood Village Public Parking Lot. Those persons attending the athletic competition or special event shall be instructed to park in such off-site parking locations, and a shuttle service shall be provided to transport visitors to the East Campus. The off-site locations shall not include the any parking on residential streets within 500 feet of the School but may include the West Campus.

# 15. Notification to Parents, Students, and Staff of Transportation and Parking Management.

- a. To ensure implementation of the transportation and parking management programs, the School shall inform parents, students, faculty, and staff in writing on an annual basis of all rules regulating School transportation and parking. The School shall require parents, students, faculty, and staff to acknowledge acceptance of the rules. These rules and regulations shall be included in the annually updated, "Student/Parent Handbook."
- b. The School shall inform parents, students, faculty and staff in writing on an annual basis of the School's disciplinary policy for violation of the rules and shall require parents, students, faculty, and staff to acknowledge acceptance of the policy. The School shall maintain a progressive disciplinary system of enforcement in which the first violation shall result in suspending driving privileges to and from campus for one week (both parent and students). The second violation shall result in suspending driving privileges to and from campus for one year (both parent and student). A violation requires that the student ride the bus. The School administration shall maintain a list of license plate numbers of all families whose children are enrolled as well as the license plate numbers for each employee who parks on the Property.

# 16. Additional Provisions for Transportation and Parking.

a. Traffic Monitors shall be stationed at each driveway on Barrington Place on school days from 7:30 A.M. to 8:15 A.M. and 3:00 P.M. to 4:00 P.M. to prevent school-related traffic queues or student drop-offs/pickups on the street.

- b. All vehicles transporting children to and from the East Campus shall load and unload students on-site. All vehicles carrying students, parents, faculty, staff, guests or other persons having business with the School shall be prohibited from parking or queuing on surrounding residential streets at any time. The School shall inform parents, students, faculty, and staff of all rules regulating school traffic and parking, and the school shall discipline students, parents, faculty, and staff who violate them.
- c. The school may use the Athletic Field for additional parking without any additional improvements.
- d. Access along Layton Drive shall be maintained for emergency vehicle access. Service and delivery vehicles shall enter and exit the Property primarily from Barrington Place. The School shall instruct companies who deliver to do so between Monday through Friday 9:00 a.m. and 5:00 p.m.
- e. All parking entrances and exits on the school property, including parking areas, shall be closed and secured by locked gates or other appropriate devices at all times when the East Campus is not in operation.
- f. The School shall employ a full-time Transportation and Parking Coordinator to manage the transportation and parking of the East Campus. This person shall also coordinate the transportation and parking of the West Campus.
- g. All commercial deliveries to the East Campus shall be outside of the hours of 7:30 A.M. to 8:30 A.M. and 2:30 P.M. to 4:00 P.M. on days when school is in session.

# 17. Transportation Passes.

- a. Walking Pass. Students, faculty and staff who live within one mile of the Property and who sign a contract with the School to walk to and from the Property may be issued a "Walking Pass" by the School.
- b. Bicycle Pass. Students, faculty and staff, and guests who sign a contract with the School to ride a bicycle to and from the Property may be issued a "Bicycle Pass" by the School.
- c. Transit Pass. Students, faculty and staff, and guests who sign a contract with the School to ride public transportation to and from the Property may be issued a "Transit Pass" from the School.

# 18. Reporting of Transportation Management Programs.

#### CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA 100 S. Barrington Place/12001 W. Sunset Boulevard

- a. Transportation Management Compliance Report. Beginning at the conclusion of the first Academic Year after the issuance of the first Certificate of Occupancy, the School shall submit yearly Transportation Management Compliance Reports to the City Planning Department, the Department of Transportation, and the Council Office that: (1) demonstrate compliance with the busing and carpooling requirements as required by Condition 13; and (2) demonstrates compliance with the applicable Trip Caps set forth in Conditions 13. A copy of the Transportation Management Compliance Report shall also be provided to the Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, and all residents immediately abutting and adjacent to the School and shall be provided on a designated page or link within the School's website for community informational purposes.
- b. Following implementation of the Event Parking and Transportation Management Plan set forth in Condition 14(a) the School shall provide annual reports regarding the issued parking reservations on a designated page or link within the School's website for community informational purposes. At the conclusion of the third Academic Year after implementation of the Event Parking and Transportation Management Plan the School shall be released from this reporting requirement.
- c. The School shall secure, at its own expense, an independent third party compliance monitor approved by the Department of City Planning who shall prepare the first annual Transportation Management Compliance Report as required in Conditions 18(a) and (b). A copy of the report shall be provided to the parties identified in Condition No. 18(a).
- 19. **Signs**. All exterior signs shall be of an identification or directional type and shall be indicated on plans submitted to and approved by the City Planning Department prior to the issuance of permits. Signs within the interior of the Property may be of any type allowed by the Municipal Code, but shall not be visible from public rights of way.
- 20. **Emergency Procedures Plan**. An Emergency Procedures Plan shall be established identifying guidelines and procedures to be utilized in the event of fire, medical urgency, earthquake or other emergencies to the satisfaction of the Police Department and Fire Department prior to the issuance of a certificate of occupancy.
- 21. Security Plan. A Security Plan shall be developed in consultation with the Police Department, outlining security features to be provided in conjunction with the operation of the School, prior to the issuance of a certificate of occupancy. In addition, the School shall provide to the West Los Angeles Area Commanding Officer a diagram of the site indicating access routes and any additional information that might facilitate police response. The School shall submit evidence of compliance to the Department of City Planning as part of the Plan Approval process discussed in Condition 29.
- 22. **Lighting.** All lighting shall be directed onto the Property. Floodlighting shall be designed and installed to preclude glare to adjoining and adjacent properties. Outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen

from adjacent properties, nor seen from above. No outdoor lighting shall be installed or used for any sporting events.

- 23. Landscaping. Open areas not used for buildings, driveways, parking areas, recreational facilities or walkways shall be attractively landscaped and maintained in accordance with the Landscape Plan included in Exhibit A, dated September 14, 2015. All trees to be removed that are 8 inches in diameter at breast height and above shall be replaced on a one-to-one basis with 24-inch box trees or larger. All open areas shall be kept free of weeds, litter, or waste matter of any type so that the entire premises will be maintained in an attractive and safe condition at all times.
- 24. **Wall.** The School shall maintain a 6-foot-high masonry block wall along the property line adjacent to the residential properties at 165 S. Layton Drive and 235 S. Woodburn Drive.

#### 25. Layton Fence and Gate.

- a. The school shall maintain a decorative metal fence with a minimum height of 5 feet and a setback of 8 feet from the curb to keep unauthorized parties from using Layton Drive to access the school. The fence shall enclose all doorways, gateways, driveways, and other means of access from or to Layton Drive that are not locked at all times.
- b. Any of the locked Layton gates or doors other than the parking lot driveway may be equipped with access via card key or other device. The card keys may be made available only to students regularly travelling from home to school on foot, by public transportation, or by bicycle. There shall be no limit on the number of card keys to these doors and gates. There is no restriction upon issuance of card keys to faculty and staff members provided they do not park their vehicles or are not dropped off in the residential areas of Layton Drive, Gunston Drive, Woodburn Drive, Ayreshire Road, or Acari Drive.
- c. All locked gates, doors, and driveways to Layton Drive may be opened at any time for emergency.
- d. No materials or equipment shall be loaded or off-loaded on Layton Drive except items which are too large for access through the Barrington Place driveways or too large for the elevator, or are necessarily carried by vehicles too large for the Barrington Place driveway. Access from Layton Drive is permitted for service vehicles that are needed for repair or maintenance of the buildings adjacent to Layton Drive.
- e. The School shall give written notice to all students, parents, faculty, staff, regular visitors, and regular suppliers and delivery drivers of the card key access restrictions concerning Layton Drive.
- f. The School shall give written notice to all students, parents, faculty, and staff that they shall not park on local streets adjacent to residential areas to the east of the school, including Layton Drive, Gunston Drive, Woodburn Drive, Ayreshire Road, or Acari Drive.

#### 26. Noise.

- a. Students shall not use the lawns near Layton Drive for eating, gathering, loitering, or playing. No student classes or other student activities shall be conducted on the Layton lawns. The students, if authorized, may cross the lawns into the school if they have card keys as described in Condition 25. Subject to the foregoing permission, Layton Drive lawns shall not be used in any way that violates any City ordinance for the use of residential property. The Layton Drive lawns may be used for any use allowable in a residential area.
- b. No loud amplified sound or loudspeakers shall be used in the North Quad or outdoors anywhere within 100 feet of any residential lot not owned by the school if such use will cause noise in excess of the ambient sound in the residential area. This provision does not prohibit amplified sound where speakers are more than 100 feet from residential properties, such as during sporting events, dinner gatherings on the Athletic Field, graduation, or the candle lighting ceremony.
- 27. **Solar Readiness.** Any newly constructed buildings shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, for solar readiness.
- 28. **Community Relations.** A phone number and email address to a designated Community Relations representative shall be provided to the Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, and all residents within 500 feet of the East Campus, to whom neighbors can report concerns or complaints, which are to be filed and maintained for the record for the Plan Approval process. A complaint log shall be kept and include the complainant's name, date and time of complaint, phone number or email address, the nature of the complaint, the date and time of the response of the complaint, and a description of how the issue was responded to or resolved. Record of all complaints must be maintained on the premise. A copy of the complaint log shall be made available to the Department of City Planning in conjunction with the Plan Approval required under Condition 29.
- 29. **Plan Approval.** One year from any certificate of occupancy for a building to complete any construction phase, the School shall file a Plan Approval application and associated fees, together with mailing labels for all property owners and tenants within 500 feet of the Property, as well as the Brentwood Community Council, the Brentwood Village Chamber of Commerce, and the Brentwood Homeowner's Association. The matter shall be set for public hearing with appropriate notice. The purpose of the Plan Approval shall be to review the effectiveness of, and the level of compliance with, the terms, and Conditions of this grant. Upon review of the effectiveness of and compliance with these Conditions, the Department of City Planning shall issue a determination. Such determination may modify the existing terms and conditions, add new terms and conditions, or delete one or more conditions, as deemed appropriate. The Department of City Planning may require one or more subsequent Plan Approval applications, as necessary. The application shall include, but not be limited to the following information:
  - a. The total number of students enrolled.
  - b. Physical modifications involving expansion or change of use or location.
  - c. Operational changes to the School such as hours of operation or parking policy.
  - d. Copy of the Transportation Management Compliance Reports set forth in Condition 18(a).
  - e. Copy of the Complaint Log detailed in Condition 28.

#### 30. Trash Storage and Removal.

- a. Trash shall be contained within an enclosed area and located at least 25 feet from any property line and not within view of adjoining properties or the public street. Trash pickup shall be made only within the property, during the hours of 9:00 A.M. and 5:00 P.M., Monday through Friday. There shall be no trash pickup on Saturday or Sunday.
- b. The trash hauling company shall be informed by the School in a letter that all activity associated with the removal of trash shall be conducted in a manner so as not to interrupt traffic on adjoining streets or cause excessive noise, disturbance or parking problems. The letter shall indicate that no service shall be permitted during the hours of student drop off and pickup. The applicable hours shall be stated in the letter. Upon mailing said letter to the trash hauling company, the School shall transmit a copy to the Department of City Planning for inclusion in the case file.
- 31. **Sports Netting**. Protective sports netting 20 feet in height shall be installed along the Sunset Boulevard perimeter, adjacent to the Middle School Athletic Field. During football season. This netting may be increased to 50 feet in height.
- 32. Sunset Educational Corridor Association (SECA). Within 180 days of issuance of this Conditional Use grant, and at least annually thereafter, the School shall join and participate in the Sunset Educational Corridor Association (SECA), a collaborative established by the Archer School for Girls and designed to encourage other independent schools along the Sunset Boulevard corridor to implement transportation management programs. The Brentwood School shall also serve as an alternate chair of SECA or be in a regular rotation as chair of SECA.
- 33. **Timing of Traffic Signals Under Caltrans Jurisdiction.** Upon the completion of Phase I, the Applicant shall inform the California Department of Transportation that the queuing situation on Sunset Boulevard may have changed due to the relocation of the Sunset Gate entrance, and that as a result, Caltrans may want to consider adjusting the timing of the traffic signals at the interchange between Sunset Boulevard and the I-405 Freeway.
- 34. Dedication(s) and Improvement(s). Prior to the issuance of any building permits, public improvements and dedications for streets and other rights of way adjoining the subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional and federal government agencies, as may be necessary), the following:
  - a. Responsibilities/Guarantees.
    - i. As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.
    - ii. Prior to issuance of sign offs for final site plan approval and/or project permits by the Planning Department, the applicant/developer shall provide written verification to the Planning Department from the responsible agency acknowledging the agency's consultation with the applicant/developer. The required dedications and improvements may necessitate redesign of the project. Any changes to project design required by a public agency shall be documented

in writing and submitted for review by the Planning Department.

- b. Construction of necessary sewer facilities to the satisfaction of the Bureau of Engineering. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.
- c. Construction of necessary drainage facilities to the satisfaction of the Bureau of Engineering.
- d. Construction of tree wells and planting of street trees and parkway landscaping to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance.
- e. Installation of the street lights shall be to the satisfaction of the Bureau of Street Lighting.
- f. Preparation of a parking area and driveway plan to the satisfaction of the appropriate District Office of the Bureau of Engineering and the Department of Transportation. A parking area and driveway plan shall be prepared for approval by the appropriate district office of the Bureau of Engineering and the Department of Transportation. The driveway, parking and loading area(s) shall be developed substantially in conformance with the Site Plan, labeled Exhibit A, dated September 14, 2015, as modified by this grant, as to their location and access, but may be modified in order to comply with provisions and conditions of the subject Department of Transportation authorization. Emergency vehicular access shall be subject to the approval of the Fire Department and other responsible agencies
- 35. Future Expansion. The School shall not acquire any interest in any additional residentially zoned land abutting the East Campus, beyond that already owned by the School for use by the Head of School as a residence. The acquisition of commercially zoned property shall not be prohibited, but it shall be subject to all conditions of this grant. The residential property owned by the School for the Head of School shall be used only for normal residential uses and shall not be used for ingress or egress to the East Campus.

#### B. <u>Vesting Conditional Use Modification Conditions</u>, Sec. 12.24.F, LAMC.

- 1. **Use.** The use and development of the subject property may be permitted the following variations of the Municipal Code regulations, and shall be in substantial conformance with Exhibit A, dated September 14, 2015:
  - a. Pursuant to LAMC Sec. 12.24.F, setbacks of 0 feet from Sunset Boulevard; 0 feet from Barrington Place and adjacent properties on Barrington Place; 10 feet from Layton Drive and adjacent residential properties on Layton Drive and Woodburn Drive, overlapping with a 45-foot landscape buffer facing the properties at 165 S. Layton Drive and 235 S. Woodburn Drive; and 0 feet from the Veterans Administration property shall be allowed, in lieu of the minimum front yard setbacks of 25 feet and side yard setbacks of 11 feet otherwise permitted by Sec. 12.21.1 of the LAMC.

#### C. Site Plan Review Conditions, Section 16.05, LAMC.

- 1. **Use.** The use and development of the subject property shall be in substantial conformance with the Site Plan labeled Exhibit A, dated September 14, 2015 which provides the following details:
  - a. Location of trash and recycling storage areas.

b. Location of loading and unloading areas.

#### D. Adjustment Conditions, Sec. 12.28, LAMC.

- 1. **Use.** The use and development of the subject property may be permitted the following variations of the Municipal Code regulations, and shall be in substantial conformance with Exhibit A, dated September 14, 2015:
  - a. Pursuant to LAMC Sec. 12.28, to allow sports netting with a permanent height of 20 feet and a height of 50 feet during football season along the East Campus perimeter along Sunset Boulevard in lieu of the three and a half feet otherwise permitted in the front yard.

## CONDITIONS OF APPROVAL: WEST CAMPUS

#### E. <u>Vesting Conditional Use Conditions</u>, Sec. 12.24 U, LAMC.

Notwithstanding any other provisions of the LAMC to the contrary, the School shall be permitted subject to the following conditions of approval:

- 1. **Site Plan**. The use and development of the subject property shall be in substantial conformance with the site plans and elevations labeled Exhibit A, stamped, signed and dated September 14, 2015, attached to the subject case file. Minor deviations may be allowed in order to comply with provisions of the Municipal Code and the conditions of approval.
- 2. Floor Area. The total building floor area on the subject property shall be calculated pursuant to the Floor area definition contained in Section 12.03 of the LAMC, and shall be limited to 73,422 square feet, including limitations on the following newly constructed buildings:
  - a. Saltair Annex: 28,500 square feet.
  - b. Admissions Building: 8,000 square feet.
  - c. New Classroom Building: 24,500 square feet.
- 3. **Use and Enrollment.** The use of the subject property shall be limited to grades Kindergarten through 6, with a maximum enrollment of 300 students. Five years after the completion of Phase I of construction, the use shall be limited to grades Kindergarten through 5. The authorized use shall be conducted at all times with due regard for the residential character of the surrounding area and the right is reserved to the City Planning Commission to impose additional corrective conditions if, in its opinion, such conditions are necessary for protection of persons using the school or residents of the area.
- 4. **Phased Development.** Construction shall occur in the following phases:

Phase I: Removal of the Admissions, Science, Music, Art, Community Room, and Child Care Buildings and the Saltair Parking Lot; Construction of the Saltair Annex and Parking Garage;

Phase II: No demolition or construction on the West Campus;

Phase III: Removal of the existing Main Classroom Building; Construction of the Admissions Building and the New Classroom Building; and

Phase IV: No demolition or construction on the West Campus.

- 5. **Access**. Primary ingress and egress for vehicles, bicycles, and pedestrians shall be limited to the driveways and entrances on Bundy Drive and Saltair Avenue.
- 6. **Height**. The height of all proposed new school buildings and structures on the subject property shall not exceed the following maximum heights as conditioned herein and defined by Section 12.03 the Los Angeles Municipal Code:
  - a. Saltair Annex: 38 feet;

- b. Admissions Building: 54 feet; and
- c. New Classroom Building: 54 feet.
- 7. **Setbacks**. The following area setbacks shall be observed:
  - a. Front yard along Bundy Drive: 25 feet.
  - b. Side yard along Sunset Boulevard: 10 feet.
  - c. Side yard facing the adjacent property to the north: 10 feet.
  - d. Front yard along Saltair Avenue: 25 feet.
- 8. **Mechanical Equipment**. All mechanical equipment on the roof of new buildings, such as air conditioning units and other related equipment, shall be fully screened from view of adjoining lots, or public right-of-way.

#### 9. Use Restrictions.

- a. <u>Renting/Leasing</u>. None of the private school facilities shall be rented, leased, or otherwise permitted to be used for any purpose other than as a private co-educational school for students in the grades of the school itself specified in Condition 3, or joint use by other schools involving related intramural activities or events.
- 10. Hours of Operation. The Applicant shall comply with the following hours of operation:
  - a. Instruction shall be permitted between 8:00 A.M. and 3:10 P.M., Monday through Friday.
  - b. Regular afterschool activities such as sports practices, Homework Club, performing arts rehearsals, etc. shall be permitted from 3:00 P.M. to 6:00 P.M., Monday through Friday.
  - c. Normal hours for the administration buildings shall be from 8:00 A.M. to 5:00 P.M.
  - d. Administration, maintenance, and security personnel may be on the campus at any time.
  - e. Other activities and events, including back to school night, parent/student activities, etc., and preparation and cleanup for these activities, shall be permitted within the following times:
    - i. Monday through Friday: 7:30 A.M. to 9:00 P.M.
    - ii. Saturday: 8:00 A.M. to 10:00 P.M.
    - iii. Sunday: Not permitted.
  - f. Other than athletic competitions, special events shall be restricted to the day, start and end times, attendance, and general type of event shown in the "Brentwood School West Campus Events List 2015-16 by Category" table attached as Exhibit 2. This list may only be amended through the Plan Approval process detailed in Condition 27.
  - g. Each semester, the School shall post its schedule, including any athletic competitions or special events, on its website calendar. Any rescheduling, including emergency situations, athletic competitions not anticipated at the beginning of a semester, etc. shall be promptly posted on the website calendar.
- 11. **Parking (vehicles)**. As shown on the Site Plan labeled Exhibit A and dated September 14, 2015, the minimum number of parking spaces that shall be provided upon the completion of the phases given is as follows:

- a. Phase I: 86 spaces, 5 of which shall be electric car ready, and 13 other spaces shall be wired for future electric use.
- b. Phase III: 116 spaces, 6 of which shall be electric car ready, and 18 other spaces shall be wired for future electric use.
- 12. **Parking (bicycle)**. In accordance with Section 12.21.A.16 of the LAMC, the minimum number of bicycle parking spaces to be provided in prominent, accessible locations shall be 4 short-term spaces per classroom and 1 long-term storage space per 10 classrooms (with a minimum of 2) upon the completion of each construction phase.
- 13. **Transportation Management Program**. The School shall develop and implement a Transportation Management Program. The details of the Transportation Management Plan shall be submitted to the Department of Transportation for its approval prior to the issuance of the first Certificate of Occupancy. The components shall include:
  - a. Carpool Program. The Applicant shall continue its carpool and busing program as part of the School's Traffic Management Program, achieving an average vehicle ridership (AVR) of 3.0 West Campus students per vehicle. Monitoring shall take place at the Applicant's expense, once per semester over periods of three consecutive days, on dates determined by LADOT and using LADOT-approved methods. Compliance shall be demonstrated in the Transportation Management Compliance Report set forth in Condition 18(a).
  - b. Vans or buses shall be used to transport 40 percent of the student enrollment on a daily basis. Vans/buses shall be defined as any vehicle capable of safely carrying 9 or more students in addition to the driver. Compliance shall be demonstrated in the Transportation Management Compliance Report set forth in Condition 18(a). The School shall contract with a licensed transportation provider and offer routes designed to maintain bus usage at 20 percent of the enrollment. To the extent feasible, the transit provider shall utilize transit routes to and from the campus which minimize congestion on major and secondary routes, to the satisfaction of the Department of Transportation. The licensed transportation provider shall be informed by the School in a letter regarding the rules regulating School transportation and parking.
  - c. AVR Count Violations:

If the monitored AVR to and from the West Campus falls below 3.0 in more than two consecutive monitoring periods, or more than two times in a 12month period, or falls to or below 2.7 in a single monitoring event, a violation has occurred and LADOT shall require the applicant to submit an amended Transportation Management Plan ensuring that the AVR shall not fall below 3.0. If the AVR again fails to meet the AVR goal after the Transportation Management Plan has been amended once, LADOT shall inform the Department of City Planning. The Department of City Planning shall then initiate a Plan Approval process to reconsider the allowed uses and conditions on site, including student enrollment, required student busing, or any other necessary conditions to ensure compliance. The Department of City Planning shall also prepare subsequent environmental review as may be required under, and consistent with, CEQA.

#### 14. Transportation and Parking Management Requirements for Special Events.

- a. The School shall develop and implement an Event Parking and Transportation Management Plan that shall include a parking reservation system. The Plan shall include additional measures such as: attendant-assisted parking, off-site parking, and temporary increases in traffic management and parking personnel as needed and other measures. The School shall submit the Plan to the Department of Transportation prior to the issuance of the first Certificate of Occupancy. The Plan may be modified to incorporate new technologies or techniques in parking and transportation management.
- b. The approved Plan shall be provided to the Department of City Planning, the Council Office, Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, the Residential Neighbors of the Brentwood School, and all residents immediately abutting and adjacent to the School. A copy of the Plan shall be provided on a designated page or link within the School's website for community information purposes. In the event of approval of any modifications to the Plan as described in Condition 27, the Plan as modified shall be provided to the group above and updated on the School's website.
- c. The Plan shall include a parking reservation system designed to implement the attendee limits in Condition 10(f) for special events. While the details of the parking reservation system shall be set forth in the Plan, it will provide a parking reservation system for those special events that are subject to the limits in Condition 10(f). Guests seeking to attend special event without a parking reservation would be denied access to the campus. The Department of Transportation may audit the parking reservation system at any time.
- d. While the details of the parking reservation system shall be set forth in the Plan, it is expected to be a mobile application or another technology or technique that shall provide information regarding the rules regulating School transportation and parking. The system shall provide off-site parking information and shuttle information as applicable to that or special event. The system shall include a reporting capability so that logs can be generated regarding the issued parking reservations.
- e. The Plan shall provide that off-site parking for vehicles in excess of West Campus capacity are prohibited from parking at the Barrington Village Public Parking Lot and on residential streets within 500 feet of the School. To enforce this prohibition, only students, faculty, staff, and guests with a pre-issued Walking Pass, Bicycle Pass, or Transit Pass, as discussed in Condition 17, may be permitted to walk onto the campus.
- f. The Plan shall provide that if an event at the School is expected to attract more vehicles than can be accommodated on the West Campus, off-site parking shall be provided at the East Campus and/or other appropriate locations, and those persons attending the event shall be instructed to park in such off-site locations. A shuttle system shall be used between the off-site parking areas and the West Campus. Shuttles shall use the Bundy Drive access driveway to drop off riders on-site. Shuttle vehicles shall be of a capacity which would facilitate the transportation of persons to and from the school so that time waiting for such vehicles is minimized and so that the use of the shuttles is maximized. Parents, students, and visitors shall be

instructed to park within these designated off-site areas and to use the shuttle system.

# 15. Notification to Parents, Students, and Staff of Transportation and Parking Management.

- a. To ensure implementation of the transportation and parking management programs, the School shall inform parents, students, faculty, and staff in writing on an annual basis of all rules regulating School transportation and parking. The School shall require parents, students, faculty, and staff to acknowledge acceptance of the rules. These rules and regulations shall be included in the annually updated, "Student/Parent Handbook."
- b. The School shall inform parents, students, faculty and staff in writing on an annual basis of the School's disciplinary policy for violation of the rules and shall require parents, students, faculty, and staff to acknowledge acceptance of the policy. The School shall maintain a progressive disciplinary system of enforcement in which the first violation shall result in suspending parent driving privileges to and from campus for one week. The second violation shall result in suspending parent driving privileges to and from campus for two weeks. The third violation shall result in suspending parent driving privileges to and from campus for one year. A violation requires that the student ride the bus. The School administration shall maintain a list of license plate numbers of all families whose children are enrolled as well as the license plate numbers for each employee who parks on the Property.

#### 16. Additional Provisions for Transportation and Parking.

- a. With the exception of those students, parents, and employees residing in the neighborhood immediately north of the West Campus, no vehicles exiting the Bundy Drive driveway shall be permitted to make a northbound right turn on Bundy Drive. In addition, with the exception of those students, parents, and employees residing in the neighborhood immediately north of the West Campus, no vehicles exiting the Saltair Avenue driveway shall be permitted to make a northbound left turn on Saltair Avenue. The foregoing restrictions shall be placed on signs that are readily visible to drivers exiting the Bundy Drive and Saltair Avenue Driveways. Saltair access may be used by vehicles which have ten or more seats and which are exclusively used to transport West Campus students.
- b. Traffic Monitors shall be stationed at each driveway on Bundy Drive on school days from 7:30 A.M. to 8:15 A.M. and 3:00 P.M. to 4:00 P.M. to prevent any school-related traffic queues or student drop-offs/pickups on the street, and to enforce turning restrictions from the exiting driveway.
- c. All vehicles transporting children to and from the West Campus shall load and unload children on-site. All vehicles carrying students, parents, faculty, staff, guests or other persons having business with the School shall be prohibited from parking or queuing on surrounding residential streets at any time. The School shall inform parents, students, faculty, and staff of all rules regulating school traffic and parking, and the school shall discipline students, parents, faculty, and staff who violate them.
- d. Student pickups in the afternoon shall be staggered over the 3:10 P.M. to 4:00 P.M. time period. Student drop-offs in the morning shall be similarly staggered over the 7:30 A.M. to 8:15 A.M. time period. The Applicant shall evaluate, on an annual or more frequent basis, the routes established for pickup and drop-off of students and

modify such routes when deemed most effective in order to minimize traffic queuing on local streets.

- e. Parking facilities on the West Campus property shall not be used by third party organizations unless those parties are visiting the West Campus for School-related purposes.
- f. All commercial deliveries to the West Campus shall be outside of the hours of student drop-off and pick-up specified in Condition 16(d).

#### 17. Transportation Passes.

- a. Walking Pass. Students, faculty and staff who live within one mile of the Property and who sign a contract with the School to walk to and from the Property may be issued a "Walking Pass" by the School.
- b. Bicycle Pass. Students, faculty and staff, and guests who sign a contract with the School to ride a bicycle to and from the Property may be issued a "Bicycle Pass" by the School.
- c. Transit Pass. Students, faculty and staff, and guests who sign a contract with the School to ride public transportation to and from the Property may be issued a "Transit Pass" from the School.

#### 18. Reporting of Transportation Management Programs.

- a. Transportation Management Compliance Report. Beginning at the conclusion of the first Academic Year after the issuance of the first Certificate of Occupancy, the School shall submit yearly Transportation Management Compliance Reports to the City Planning Department, the Department of Transportation, and the Council Office that demonstrate compliance with the average vehicle ridership and busing requirements as required by Condition 13. A copy of the Transportation Management Compliance Report shall also be provided to the Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, and all residents immediately abutting and adjacent to the School and shall be provided on a designated page or link within the School's website for community informational purposes.
- b. The School shall secure, at its own expense, an independent third party compliance monitor approved by the Department of City Planning who shall prepare the first annual Transportation Management Compliance Report as required in Conditions 18(a). A copy of the report shall be provided to the parties identified in Condition 18(a).
- 19. **Signs**. All exterior signs shall be of an identification or directional type and shall be indicated on plans submitted to and approved by the City Planning Department prior to the issuance of permits. Signs within the interior of the Property may be of any type allowed by the Municipal Code, but shall not be visible from public rights of way.
- 20. **Emergency Procedures Plan**. An Emergency Procedures Plan shall be established identifying guidelines and procedures to be utilized in the event of fire, medical urgency, earthquake or other emergencies to the satisfaction of the Police Department and Fire Department prior to the issuance of a certificate of occupancy.

- 21. Security Plan. A Security Plan shall be developed in consultation with the Police Department, outlining security features to be provided in conjunction with the operation of the School, prior to the issuance of a certificate of occupancy. In addition, the School shall provide to the West Los Angeles Area Commanding Officer a diagram of the site indicating access routes and any additional information that might facilitate police response. The School shall submit evidence of compliance to the Department of City Planning as part of the Plan Approval process discussed in Condition 17.
- 22. Lighting. All lighting shall be directed onto the Property. Floodlighting shall be designed and installed to preclude glare to adjoining and adjacent properties. Outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen from adjacent properties, nor seen from above. No outdoor lights shall be installed or used for any events, except for lighting for security, safety, and low illumination purposes (such as at dining tables).
- 23. Landscaping. Open areas not used for buildings, driveways, parking areas, recreational facilities or walkways shall be attractively landscaped and maintained in accordance with the Landscape Plan included in Exhibit A, dated September 14, 2015. All trees to be removed that are 8 inches in diameter at breast height and above shall be replaced on a one-to-one basis with 24-inch box trees or larger.
- 24. **Noise.** There shall be no use of exterior school bells or other amplified sound during the School's normal daily operations. Exterior amplified sound may be used in connection with: a) up to 8 daytime and 6 evening events per 12-month period; and, b) musical instruments used by members of the school's band or orchestra. All exterior amplified sound shall be oriented away from adjacent residential areas and shall not begin before 10:00 A.M. or continue beyond 5:00 P.M., except in connection with such 6 evening events at which such sound shall not continue beyond 9:30 P.M. The permissible cumulative duration of such exterior amplified sound shall be as follows:
  - a. For the 8 daytime events:
    - i. 3 events with duration of up to 30 minutes
    - ii. 4 events with duration of up to 60 minutes
    - iii. 1 event with a duration of up to 90 minutes
  - b. For the 6 evening events:
    - i. 5 events with a duration of up to 30 minutes
    - ii. 1 event with a duration of up to 60 minutes
- 25. **Solar Readiness.** Any newly constructed buildings shall comply with the Los Angeles Municipal Green Building Code, Section 99.05.211, for solar readiness.
- 26. **Community Relations.** A phone number and email address to a designated Community Relations representative shall be provided to the Brentwood Community Council, Brentwood Village Chamber of Commerce, Brentwood Homeowners Association, and all residents within 500 feet of the West Campus, to whom neighbors can report concerns or complaints, which are to be filed and maintained for the record for the Plan Approval process. A complaint log shall be kept and include the complainant's name, date and time of complaint, phone number or email address, the nature of the complaint, the date and time of the response of the complaint, and a description of how the issue was responded to or resolved. Record of all complaints

must be maintained on the premise. A copy of the complaint log shall be made available to the Department of City Planning in conjunction with the Plan Approval required under Condition 27

- 27. Plan Approval. One year from any certificate of occupancy for a building to complete any construction phase, the School shall file a Plan Approval application and associated fees, together with mailing labels for all property owners and tenants within 500 feet of the Property, as well as the Brentwood Community Council, the Brentwood Village Chamber of Commerce, and the Brentwood Homeowner's Association. The matter shall be set for public hearing with appropriate notice. The purpose of the Plan Approval shall be to review the effectiveness of, and the level of compliance with, the terms, and Conditions of this grant. Upon review of the effectiveness of and compliance with these Conditions, the Department of City Planning shall issue a determination. Such determination may modify the existing terms and conditions, add new terms and conditions, or delete one or more conditions, as deemed appropriate. The Department of City Planning may require one or more subsequent Plan Approval applications, as necessary. The application shall include, but not be limited to the following information:
  - a. The total number of students enrolled.
  - b. Physical modifications involving expansion or change of use or location.
  - c. Operational changes to the School such as hours of operation or parking policy.
  - d. Copy of the Transportation Management Compliance Reports set forth in Condition 18(a).
  - e. Copy of the Complaint Log detailed in Condition 26.

#### 28. Trash Storage and Removal.

- a. Trash shall be contained within an enclosed area and located at least 25 feet from any property line and not within view of adjoining properties or the public street. Trash pickup shall be made only within the property, during the hours of 9:00 A.M. and 5:00 P.M., Monday through Friday. There shall be no trash pickup on Saturday or Sunday.
- b. The trash hauling company shall be informed by the School in a letter that all activity associated with the removal of trash shall be conducted in a manner so as not to interrupt traffic on adjoining streets or cause excessive noise, disturbance or parking problems. The letter shall indicate that no service shall be permitted during the hours of student drop off and pickup. The applicable hours shall be stated in the letter. Upon mailing said letter to the trash hauling company, the School shall transmit a copy to the Department of City Planning for inclusion in the case file.
- 29. Sunset Educational Corridor Association (SECA). Within 180 days of issuance of this Conditional Use grant, and at least annually thereafter, the School shall join and participate in the Sunset Educational Corridor Association (SECA), a collaborative established by the Archer School for Girls and designed to encourage other independent schools along the Sunset Boulevard corridor to implement transportation management programs. The Brentwood School shall also serve as an alternate chair of SECA or be in a regular rotation as chair of SECA.
- 30. Dedication(s) and Improvement(s). Prior to the issuance of any building permits, public improvements and dedications for streets and other rights of way adjoining the

subject property shall be guaranteed to the satisfaction of the Bureau of Engineering, Department of Transportation, Fire Department (and other responsible City, regional and federal government agencies, as may be necessary), the following:

- a. Responsibilities/Guarantees.
  - i. As part of early consultation, plan review, and/or project permit review, the applicant/developer shall contact the responsible agencies to ensure that any necessary dedications and improvements are specifically acknowledged by the applicant/developer.
  - ii. Prior to issuance of sign offs for final site plan approval and/or project permits by the Planning Department, the applicant/developer shall provide written verification to the Planning Department from the responsible agency acknowledging the agency's consultation with the applicant/developer. The required dedications and improvements may necessitate redesign of the project. Any changes to project design required by a public agency shall be documented in writing and submitted for review by the Planning Department.
- b. Construction of necessary sewer facilities to the satisfaction of the Bureau of Engineering. All Sewerage Facilities Charges and Bonded Sewer Fees are to be paid prior to obtaining a building permit.
- c. Construction of necessary drainage facilities to the satisfaction of the Bureau of Engineering.
- d. Construction of tree wells and planting of street trees and parkway landscaping to the satisfaction of the Street Tree Division of the Bureau of Street Maintenance.
- e. Installation of the street lights shall be to the satisfaction of the Bureau of Street Lighting.
- f. Preparation of a parking area and driveway plan to the satisfaction of the appropriate District Office of the Bureau of Engineering and the Department of Transportation. A parking area and driveway plan shall be prepared for approval by the appropriate district office of the Bureau of Engineering and the Department of Transportation. The driveway, parking and loading area(s) shall be developed substantially in conformance with the Site Plan, labeled Exhibit A, dated September 14, 2015, as modified by this grant, as to their location and access, but may be modified in order to comply with provisions and conditions of the subject Department of Transportation authorization. Emergency vehicular access shall be subject to the approval of the Fire Department and other responsible agencies.
- 31. **Future Expansion.** The School shall not acquire any interest in any additional residentially zoned land abutting the West Campus.

#### F. <u>Vesting Conditional Use Modification Conditions</u>, Sec. 12.24.F, LAMC.

- 1. **Use.** The use and development of the subject property may be permitted the following variations of the Municipal Code regulations, and shall be in substantial conformance with Exhibit A, dated September 14, 2015:
  - a. Pursuant to LAMC Sec. 12.24.F, Heights of 38 feet for the Saltair Annex building and 54 feet for the New Classroom Building and the Admissions Building on the West Campus, in lieu of the height limit of 36 feet otherwise permitted by Sec. 12.21 C.10 of the LAMC.

#### G. Site Plan Review Conditions, Section 16.05, LAMC.

- 1. **Use.** The use and development of the subject property shall be in substantial conformance with the Site Plan labeled Exhibit A, dated September 14, 2015 which provides the following details:
  - a. Location of trash and recycling storage areas.
  - b. Location of loading and unloading areas.

#### H. <u>Determination Conditions</u>, Sec. 12.24 X.28, LAMC.

- 1. **Use.** The use and development of the subject property may be permitted the following variation of the Municipal Code regulations, and shall be in substantial conformance with Exhibit A, dated September 14, 2015:
  - a. Pursuant to LAMC Section 12.24 X.28, to allow approximately 5,000 cubic yards of grading and export in the Hillside Area.

#### I. <u>Conditions for an Employee Childcare Facility</u>, Section 12.24-W.51, LAMC.

- 1. **Use.** The use and development of the subject property shall be in substantial conformance with the Site Plan labeled Exhibit A, dated September 14, 2015.
- 2. Licensing. All childcare staff members shall be fully licensed by the State of California to perform childcare duties, and staffing shall ensure that state-mandated ratios of adults to children are maintained.
- 3. **Maximum enrollment.** Notwithstanding the State licensing requirements, no more than 15 children shall be enrolled in the on-site employee childcare program.
- 4. **Employee Use.** Childcare shall be provided only for the children of employees of the Brentwood School.
- 5. **Hours of Operation**. Employee Childcare hours shall be from 7:15 A.M. to 4:30 P.M., Monday through Friday.
- 6. Pickup and drop-off. The driveway accessed from Saltair Avenue shall be used for child pickup and drop-off. Four pickup/drop-off parking spaces shall be maintained so as to not interrupt flow in the driveway and avoid queuing on the public right-of-way. Additional pickup/drop-off and staff parking shall be provided in the proposed underground parking garage accessed from Bundy Drive.
- 7. **Events.** No special events or other use outside of childcare use shall be permitted in the childcare facility.
- 8. **Lighting.** Exterior light sources shall consist of low-level lighting for security, wayfinding, architectural, and landscaping purposes.
- 9. Noise. No public address system shall be used in the childcare facility.

## CONDITIONS OF APPROVAL APPLICABLE TO BOTH CAMPUSES

#### J. Environmental Conditions (ENV-2014-572-EIR)

- Aesthetics and Visual Resources: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of City Planning. (PDF AES-1)
- Aesthetics and Visual Resources: Massing of the buildings shall take advantage of the arroyo setting, as appropriate, and the arrangement of the existing core of the East Campus, with no new building roofs along the Layton Drive side of the Campus exceeding a height of 520 feet above mean sea level. (PDF AES-2)
- 3. Aesthetics and Visual Resources: At least one year prior to commencing construction of the Northeast Classroom Building, nine evergreen trees shall be planted along the common boundary with the property located at 165 S. Layton Drive. These trees shall be of a sufficient size and height and have a sufficient growth rate under normal growing conditions to provide full screening of the Northeast Classroom Building, as seen from the backyard of the property located at 165 S. Layton Drive, within three years of completion of this building. (PDF AES-3)
- 4. Aesthetics and Visual Resources: Should the School construct the regulation-size football field option, the School shall plant evergreen trees and shrub or vine landscape screening to cover the front of the retaining wall along the north boundary of the regulation-size football field to soften the appearance. The tree trunks shall be spaced at no greater than 15 feet on center and be placed along the wall where the wall height is taller than 5 feet high, and shrubs or vines shall be placed along the entire length of the wall. (PDF AES-4)
- 5. **Aesthetics and Visual Resources:** The central lawn shall be preserved and enhanced by siting new buildings at the perimeter of the West Campus. (PDF AES-5)
- 6. Aesthetics and Visual Resources: All new buildings shall not exceed 36 feet in height as measured from the center of the West Campus, to be consistent with the existing visual character of the West Campus. (PDF AES-4)
- 7. Light, Glare, and Shading: All exterior night lighting installed on the East and West Campuses shall be of low-intensity, low-glare design and hooded to direct light directly downward onto the area being lighted to prevent spillover onto adjacent parcels. Exterior lighting fixtures must be kept to the minimum number and intensity needed to ensure public safety. These lights shall be dimmed after 10:00 P.M. to the maximum extent practical without compromising safety. Upward-directed exterior lighting is prohibited. All exterior lighting fixtures shall be appropriate for the architectural style of the Campuses. (PDF LT-1)
- 8. Light, Glare, and Shading: Outdoor commercial filming shall be subject to the following restrictions: (a) no such filming shall occur within 50 feet of any off-site residential lot, except within buildings or courtyards; (b) explosions and other disruptive special effects

shall be prohibited; (c) all such filming shall cease by 9:00 P.M.; (d) all temporary lights used in connection with such filming shall be directed away from adjacent residential properties and shall not create more than 0.5 foot-candles of additional light at ground level at the property line of adjacent off-site residential lots not owned by the Brentwood School; and (e) such filming shall obtain all necessary FilmL.A. permits and comply with all applicable FilmL.A. requirements. (PDF LT-2)

- 9. Light, Glare, and Shading: Glass used in building façades shall be anti-reflective or treated with an anti-reflective coating to minimize glare. (PDF LT-3)
- 10. **Air Quality:** The Applicant shall include a construction schedule that would not have two or more construction phases on either Campus occurring simultaneously. This would minimize maximum daily construction emissions. (PDF AQ-1)
- 11. Air Quality: The Applicant shall incorporate a combination of energy conservation measures to exceed the requirements of the 2013 Building Energy Efficiency Standards, comprising Title 24, Parts 1 and 6, of the California Code of Regulations, and City of Los Angeles codes in effect at the time of circulation of this Draft EIR, including one or more of the following:
  - a. High-performance façade to reduce solar heat gain;
  - b. Exterior shading devices;
  - c. Daylight illumination of occupied spaces;
  - d. Centrally monitored electricity-metering network; and
  - e. Other energy conservation measures available at the time that building permits for the Project are submitted to the City of Los Angeles Department of Building and Safety, which may incorporate newly developed technology that has been proven to conserve energy.

In the event that Title 24 is amended such that the energy conservation requirements exceed the 2008 Title 24 requirements, the Applicant shall comply with the amended Title 24. Plans submitted for building permits shall include written notes or calculations demonstrating exceedance of energy standards, which shall be reviewed and approved by the City of Los Angeles Department of Building and Safety, or designee, prior to the issuance of building permits. (PDF AQ-2

- 12. **Geology:** Development under the Education Master Plan shall be designed in accordance with the Los Angeles Building Code (LABC) and the California Building Code (CBC) to minimize the potential for damage due to geologic hazards. (PDF GEO-1)
- 13. **Geology:** Development under the Education Master Plan shall include landscaped and paved open space areas as well as new buildings and non-erosive drainage structures that shall be designed to prevent accelerating instability that would constitute a hazard to other properties. (PDF GEO-2)
- 14. **Geology:** Where sufficient space is not available for sloped embankments, cantilevered shoring shall be used. Shoring may consist of steel soldier piles placed in drilled holes, filled with concrete, and braced, if required. (PDF GEO-3)
- 15. Geology: Subterranean and semi-subterranean structures and basins shall include design features to prevent water damage and allow for sufficient percolation or

conveyance of stormwater. Such design measures may include pile foundations, waterproofing, gravel base material, subdrains, or sump pumps to remove water from beneath the parking garages or subterranean and semi-subterranean structures, as required. (PDF GEO-4)

- 16. Geology: As part of the design development for each individual component for each Phase of the Education Master Plan Project, a detailed, final design-level geotechnical and soils report shall be prepared by a certified civil engineer or registered engineering geologist for review and approval by the City of Los Angeles, Department of Building and Safety. The report shall include recommendations for siting, slope stability, compaction, fills, and foundations, and other issues deemed appropriate by the civil engineer or engineering geologist. All geotechnical design recommendations shall be included in construction drawings and specifications prior to approval of final Project plans and issuance of grading and building permits. (MM GEO-1)
- 17. **Geology:** All grading and earthwork recommendations from the Project geotechnical and soils reports, including any updates, shall be incorporated into the final Project design, including the final grading, drainage, and erosion control plans, or other plans deemed necessary by the City of Los Angeles Department of Building and Safety, or designee, and must ensure they meet the City's Building Code requirements. All grading activities shall be supervised by a registered civil engineer or certified engineering geologist. Final grading, drainage, and erosion control plans shall be reviewed and approved by the City Department of Building and Safety before the City issues a grading permit. (MM GEO-2)
- 18. Geology: During construction, non-engineered fills shall be excavated and replaced as compacted fill properly bunched into suitable materials, in accordance with City of Los Angeles requirements, or removed. The suitability of the excavated material for reuse in the compacted fills shall be confirmed during the final design-level, site-specific geotechnical investigation. (MM GEO-3)
- 19. **Geology:** Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), diversion dikes shall be constructed to channel runoff around the Project site. Channels shall be lined with grass or roughened pavement to reduce runoff velocity. Stockpiled and excavated soil shall be covered with secured tarps or plastic sheeting. (MM GEO-4)
- 20. Hydrology and Water Quality: The Applicant shall file a Notice of Intent with the State Water Resources Control Board for coverage under the General Construction Permit, and a Storm Water Pollution Prevention Plan (SWPPP) shall be provided to the City of Los Angeles Department of Public Works. The SWPPP shall include a series of Best Management Practices (BMPs) to meet the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology standards. These BMPs shall be implemented as required based on the phase of construction and the weather conditions to effectively control erosion, sediment, and other construction-related pollutants. The BMPs shall also identify procedures for cleanup in the event of contamination from construction-related substances, such as fuel, oil, grease, lubricants, paint, and construction debris. The BMPs to be implemented during construction include, but are not limited to the following:
  - a. Temporary berms and sedimentation traps (such as silt fencing, straw bales, and sand bags); these shall be placed at the base of all cut/fill slopes and soil stockpile

areas where potential erosion may occur, and must be maintained to ensure effectiveness. The sedimentation basins and traps must be cleaned periodically, and the silt must be removed and disposed of in a location approved by the City.

- b. Unpaved areas must be revegetated or restored (i.e., geotextile binding fabrics) immediately after grading and installation of utilities to minimize erosion and to reestablish soil structure and fertility; revegetation must include noninvasive, drought-resistant, and fast-growing vegetation that would quickly stabilize exposed ground surfaces; alternative materials rather than reseeding (e.g., gravel) may be used.
- c. Runoff must not be directed across exposed slopes and must be conveyed in accordance with the approved drainage plans.
- d. Energy dissipaters or similar devices must be installed at the end of drainpipe outlets to minimize erosion during storm events.
- e. Grading must occur during the dry season (April 15-November 1) unless the Cityapproved erosion control plan is in place and all erosion control measures are in effect; erosion control measures must be identified on an erosion control plan and must prevent runoff, erosion, and siltation; all exposed graded surfaces shall be reseeded with ground cover vegetation to minimize erosion; graded surfaces must be reseeded within 4 weeks of grading completion, with the exception of surfaces graded for the placement of structures; these surfaces shall be reseeded if construction of structures does not commence within 4 weeks of grading completion.
- f. Site grading must be completed to ensure that permanent drainage away from foundations and slabs is provided and so that water does not pond near proposed structures or pavements.
- g. The final SWPPP shall be submitted to the City of Los Angeles Department of Public Works, Engineering, for review and approval before the City issues a grading permit. BMPs shall be implemented prior to initiation of grading as appropriate and throughout the construction period. (PDF WR-1)
- 21. Hydrology and Water Quality: For any construction that would disturb less than 1 acre at a time, all applicable BMPs meeting the minimum requirements contained in the Municipal Separate Storm Sewer System Permit (National Pollutant Discharge Elimination System Permit No. CAS00400) shall be in place prior to commencing grading or construction. These BMPs would include but are not limited to the following:
  - a. Retaining sediments generated on the Project site using adequate Treatment Control or Structural BMPs;
  - b. Retaining construction-related materials, wastes, spills, or residues at the Project site;
  - c. Containing non-stormwater runoff from equipment and vehicle washing and any other activity at the Project site; and
  - d. Controlling erosion from slopes and channels by implementing an effective combination of BMPs. (PDF WR-2)
- 22. Hydrology and Water Quality: A Standard Urban Stormwater Mitigation Plan (SUSMP), which would incorporate Low Impact Development Standards (LIDs), shall be submitted to the City of Los Angeles to manage long-term stormwater quantity and quality during operations. The SUSMP shall include drawings and specifications of the permanent stormwater quality BMPs, including continuous deflection separator units and media filters, vegetated swales, filter strips, or bioretention facilities that would be integrated in the landscape areas, green roofs, and porous concrete such that the

effective impervious areas would decrease (or BMPs of similar technology with equivalent treatment or pollutant removal performance), as applicable. (PDF WR-3)

- 23. **Hydrology and Water Quality:** The Applicant shall prepare final stormwater runoff control measures based on related geotechnical and hydrologic engineering reports, including methods of analysis, that have been prepared and approved as demonstrating compliance, and incorporate measures including but not be limited to the following:
  - a. Stormwater control measures for the post-development peak flows that ensure discharge off site would be less than the pre-development peak flows for the entire Project site.
  - b. Stormwater runoff reduction measures demonstrating post-development volume quantities retained on the Project site are greater than pre-development volume quantities for a 1-inch storm event.

The Project shall include one detention tank at the East Campus and two detention tanks at the West Campus, for a total of three detention tanks, to reduce the runoff rates in accordance with County requirements.

- c. Proof that the detention tanks would function appropriately, including schematic drawings of each basin showing the high water level (HWL) at capacity, floor elevations, inlet/outlet elevations and design flow, and effects, if any, on subterranean parking garages.
- d. Provide drainage area flow rates, basic outlet inlet/outlet configuration (e.g., pipe, open channel, weir), total available volume, etc.
- e. Provide data on the detention portion of volume utilized at design flow rates and associated detention volume.
- f. Submit drainage plans prepared by a registered civil engineer to the City of Los Angeles Department of Public Works prior to the approval of any grading permit. City of Los Angeles Department of Public Works staff shall verify compliance with this condition. (PDF WR-4)
- 24. **Hydrology and Water Quality:** For each phase of development under the Education Master Plan, final hydrology reports and Standard Urban Stormwater Mitigation Plans (SUSMPs) shall be prepared by a licensed civil engineer to reduce the potential for pollutant discharges into water bodies during Project operations. A preliminary set of design components includes but is not limited to the following:
  - a. Calculations on pre- and post-development stormwater runoff volumes, required storage capacity, specifics on all elements of the drainage control system, and demonstration of compliance with the City's Low Impact Design Strategies for a Tier 3 project over 20,000 square feet.
  - b. Catch basin filter inserts capable of capturing sediment, trash, debris, and petroleum products from low-flow (first-flush) stormwater runoff must be installed in each stormwater inlet/catch basin to be connected to the storm drain system serving the Project site. Catch basin filter inserts must be specified for installation in all Project stormwater inlets/catch basins shown on the final grading/drainage plan.
  - c. Regular maintenance and cleaning of catch basins and detention basins.
  - d. Routine cleaning of streets, parking lots, and storm drains.
  - e. Stenciling of all storm drain inlets to discourage dumping by informing the public that water flows to the ocean.
  - f. Development of an integrated pest management program for landscaped areas of the Project emphasizing the use of biological, physical, and cultural controls rather than chemical controls.

- g. Provision of trash storage/material storage areas that are covered by a roof and protected from surface runoff.
- h. Drainage improvements associated with the Project shall route as much roof, parking areas, and surface drainage as possible through the proposed on-site landscape areas and bioswales before it enters any catch basin drop inlets.
- i. The final SUSMP must be submitted to City of Los Angeles Department of Public Works Engineering Division or Department of Building and Safety staff, as applicable, for review and approval prior to issuance of a building permit for each phase. All BMPs must be implemented as identified on the Plan and grading and drainage plans prior to occupancy. (PDF WR-5)
- 25. Noise: Construction shall be limited to between the hours of 8:00 A.M. and 4:00 P.M., Monday through Saturday, except for infrequent activities such as concrete pours that must be completed within a single workday. However, concrete pouring shall not occur after 9:00 P.M. Truck hauling and heavy equipment and materials deliveries shall be limited to between the hours of 9:00 A.M. and 2:30 P.M. No construction activity shall occur on Sundays or holidays. (PDF N-1)
- 26. **Noise:** A Construction Noise Management Plan shall be followed throughout any construction activity, and shall include the following practices:
  - a. Two weeks prior to the commencement of construction for any phase, notification shall be provided to surrounding land uses within 1,000 feet of the Project site disclosing the construction schedule, including various types of activities that would be occurring throughout the duration of each construction phase.
  - b. Construction equipment shall be properly muffled according to industry standards and shall be in good working condition.
  - c. Pile drivers and vibratory rollers shall not be used in the construction of the Project. Large bulldozers and hoe rams shall not be used within 15 feet of any existing offsite structure.
  - d. Noise-generating equipment and staging areas shall be located away from residences where feasible.
  - e. Electric air compressors and similar power tools rather than diesel equipment shall be used where feasible.
  - f. Vehicles in loading and unloading queues shall have their engines turned off after 5 minutes when not in use.
  - g. Construction equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes, unless otherwise more restrictive idling times are specified in Project Design Features or Mitigation Measures provided in Section IV.C, Air Quality.
  - h. Construction vehicles and equipment outfitted with backup alarms shall utilize smart backup alarms that will generate sound no more than 5 dB louder than the surrounding noise instead of fixed-decibel backup alarms.
  - i. At the East Campus, during construction of the Northeast Classroom and Upper School Gymnasium Buildings (other than interior construction) on the upper level parking lot, the Applicant shall maintain a noise curtain along the common boundary with the property located at 165 S. Layton Drive and the two adjacent properties located at 227 and 235 S. Woodburn Drive, unless the owner of such property agrees in writing that no noise curtain is necessary.
  - j. At the West Campus, during construction of the Saltair Annex, the Applicant shall maintain a noise curtain along the north and east boundaries to shield residences to the north and the St. Martin of Tours Catholic Church and School to the east. During

construction of the New Classroom Building and Admissions Building, the Applicant shall maintain a noise curtain along the west boundary to shield residences to the south along Bundy Drive.

- k. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding residents to contact the job superintendent. If the superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action to the responsible party. (PDF N-2)
- 27. **Noise:** Loudspeakers and other sound amplification equipment on Campus property may be used outdoors, provided that the speakers shall not be oriented directly toward any off-site residence; and when within 100 feet of a residence, the noise levels shall not exceed 5 dB(A) greater than ambient measurements. (PDF N-3)
- 28. **Transportation and Traffic:** As part of the Project, the Applicant shall expand its Transportation Demand Management (TDM) program on the East Campus to include additional busing and carpooling programs to mitigate the potential increase in vehicle trips to and from the Campus associated with the increase in student enrollment.

Any remote parking lots used in conjunction with buses or other shuttles to and from the East Campus shall not include use of remote lots on the adjacent Veterans Administration property or within the vicinity of the Project site. (PDF TR-1)

- 29. **Transportation and Traffic:** The Project shall improve internal driveways, parking facilities, and pedestrian circulation accommodations on both Campuses to improve access and pickup and drop-off operations. These features on the East Campus include:
  - a. A new driveway on Barrington Place shall be installed farther from Sunset Boulevard than the existing driveway along Barrington Place. The existing curb cut will remain, but it will only be used for emergency access or occasional oversized vehicle uses.
  - b. The new driveway shall lead directly to the Project's new parking garage under the new Middle School Classroom Building.
  - c. A single-level parking garage shall be constructed beneath the Upper School Arts Building at the same level as, and contiguous with, the Phase I parking garage.
  - d. Subject to VA approval, the site of the existing senior parking lot shall be reconfigured with pavement and mature landscaping to create a second drop-off and pickup forecourt to accommodate vehicles from the existing secondary access driveway at the intersection of Chayote Street and Barrington Place. (PDF TR-2)
- 30. **Transportation and Traffic:** At full build-out, parking on the East Campus shall be consolidated into two parking garages, and surface parking on the School-owned property shall be eliminated. There shall be sufficient parking on site to eliminate reliance on parking spaces currently located on the VA property. (PDF TR-3)
- 31. Transportation and Traffic: Barrington Place adjacent to the East Campus shall be restriped to improve circulation on the north end near Sunset Boulevard. A conceptual striping plan was prepared (provided in Figure IV.J-4. Barrington Place Conceptual Striping Plan) to show the potential for increasing capacity by extending the left-turn pocket at Sunset Boulevard and limiting metered parking during the evening peak hour. The recommended striping concept with installment of the new driveway on Barrington Place will allow more stacking for inbound school traffic and provide better circulation for

westbound traffic in the evening peak hour. The existing curb cut will remain, but it will only be used for emergency access or occasional oversized vehicle use.

This striping concept requires the removal of two metered parking spaces and placement of peak-hour (3:00 P.M. to 6:00 P.M.) parking restrictions for approximately seven parking spaces on the north side of Barrington Place and the removal of two metered parking spaces on the south side of Barrington Place opposite the proposed new driveway. (PDF TR-4)

- 32. **Transportation and Traffic:** The primary construction traffic route (for equipment and soil hauling and construction workers) for the East Campus shall be through the VA property to and from Wilshire Boulevard or Sepulveda Boulevard, provided that the VA continues to permit such access. If a route through the VA property is not available, then construction traffic shall access the East Campus using Sunset Boulevard to and from the I-405. All staging and parking shall occur on site. (PDF TR-5)
- 33. Transportation and Traffic: Construction workers for the West Campus shall park in designated areas on the East Campus or another off-site location and shall be driven by shuttle bus to the West Campus to avoid any parking by construction workers in the residential neighborhood or the VA lot. All contracts with construction contractors shall expressly prohibit construction worker parking on the residential streets in the Project vicinity and the VA lot. West Campus construction workers shall arrive at the East Campus or other off-street location no later than 6:45 A.M. and be shuttled to the West Campus before 7:00 A.M. to avoid the A.M. peak-hour traffic period. (PDF TR-6)
- 34. Transportation and Traffic: All heavy truck hauling of construction equipment, construction materials deliveries, and excess soil export shall be limited to the hours between 9:00 A.M. and 2:30 P.M. to avoid both the A.M. and P.M. peak-hour commuter traffic periods. This restriction shall not apply to concrete trucks if there is a concrete pour that cannot feasibly be finished prior to 2:30 P.M. No on-street staging or idling of haul trucks on public roadways will be allowed. (PDF TR-7)
- 35. **Transportation and Traffic:** The Applicant has proposed to make its athletic facilities located on the VA Property available for use by veterans from the WLA VA Facility. All such veterans shall access these athletic facilities directly from the VA Campus and shall not drive onto the East Campus via public streets. (PDF TR-8)
- 36. **Transportation and Traffic:** School buses or shuttles transporting Brentwood School students shall be prohibited from using Chaparal Street. (PDF TR-9)
- 37. **Transportation and Traffic:** There shall be no net increase in the number of athletic or special events at either Campus that start before 7:30 P.M. (PDF TR-10)

#### 38. Transportation and Traffic:

a. Amended TDM Program:

The Applicant shall amend the existing East Campus TDM program (TDM Plan) to achieve a zero net increase in School-related vehicle trips during the peak hours. This expanded TDM Plan shall be submitted to LADOT for review and approval. The amended TDM Plan, as approved by LADOT, shall ensure zero net increase in trips over the Final Trip Cap, using one or more of the following methods:

i. Increasing the percentage of students on school buses;

- ii. Increasing the number of students per carpool;
- iii. Implementing a student vanpool program, with remote pickup and drop-off locations;
- iv. Increasing bicycling and walking to school by students and employees;
- v. Increasing staff and faculty carpooling;
- vi. Instituting an employee vanpool program;
- vii. Requiring employees to arrive and/or depart outside the peak traffic hours;
- viii. Increasing the use of public transit, including buses and the Expo Line, including instituting a shuttle service to and from the Expo Line;
- ix. Requiring carpooling or busing to on-campus special events or athletic competitions;
- x. Scheduling certain on-campus special events or athletic competitions to start after 7:30 p.m. or moving them to weekends to avoid peak hour traffic.
- xi. Providing incentives to faculty, employees, visitors, vendors, parents, and students for the use of carpools, vanpools, buses, and other non-personal vehicle arrival;
- xii. Requiring Brentwood School to enter into an agreement with parents and students to comply with relevant TDM measures.
- b. Final Trip Cap Calculation
  - i. Initial Trip Cap

The initial trip cap on all vehicle trips to and from the East Campus between the hours of 7:30 A.M. and 8:30 A.M. and 3:00 P.M. and 6:00 P.M. shall be 4,563 total trips (the Initial Trip Cap) as counted over a period of three consecutive weekdays (Tuesday, Wednesday, and Thursday) (i.e., a daily average of 1,521 trips). This is based on semiannual traffic counts taken in accordance with the monitoring procedures set forth below in MM TR-1(d) over three consecutive semesters, reviewed and approved by LADOT.

ii. Supplemental Trip Cap Count

Because the collected traffic counts did not include the extended hours of 6:00 to 7:00 PM, the Applicant shall retain a qualified, independent traffic data collection firm (traffic consultant) at its expense, subject to LADOT approval, to conduct additional traffic surveys in accordance with the monitoring procedures set forth below in MM TR-1(d). The traffic consultant shall conduct three consecutive semiannual traffic surveys over three consecutive semesters that count all inbound and outbound pedestrian and vehicles at the East Campus driveways between 6:00 P.M. and 7:00 P.M. over three consecutive weekdays on Tuesday through Thursday (Supplemental Traffic Counts), as these three days generally have the most consistent school attendance.

iii. Final Trip Cap

The Final Trip Cap shall be the sum of the Initial Trip Cap and the average of the Supplemental Traffic Counts, all multiplied by 105 percent (to account for periodic fluctuations in traffic that are outside of the School's reasonable control).

Both the Initial and Final Trip Caps shall cover all trips to and from the East Campus, including students, faculty, staff, vendors, and visitors, during the covered periods. Students who are dropped off in the vicinity of the East Campus or who park in any off campus location and walk into school shall count as two trips (one inbound and one outbound).

c. Future Monitoring

Subsequent monitoring shall be conducted at the Applicant's expense, in a manner, method, and frequency approved by LADOT to demonstrate that the

total trips to and from the East Campus from 7:30 A.M. to 8:30 A.M. and from 3:00 P.M. to 7:00 P.M. do not exceed the established Final Trip Cap. The monitoring shall continue through 2041 and be consistent with the methodology in MM TR-1(d).

All monitoring reports and back up video files shall be made available to LADOT for review.

d. <u>Trip Count Methodology</u>

The Applicant shall implement a trip count methodology for all future monitoring, in a format that is acceptable to LADOT, that includes the following:

- (1) The Applicant shall retain an independent monitoring firm to conduct the monitoring and shall endure that there are a sufficient number of personnel to monitor the Sunset (Main) Gate and the Village Gate, as well as the Brentwood Village commercial area to account for any offsite student dropoffs or pick-ups within ¼ mile of the Sunset (Main) Gate. The monitoring locations shall be established and mapped for consistency from count to count, and written instructions and responsibilities shall be provided to each assigned personnel;
- (2) Count line locations shall be established and mapped for consistency at both the Sunset (Main) Gate and the Village Gate.
- (3) Monitoring shall also include the use of video cameras, and the locations and angles of which shall be established and mapped for consistency from count to count. At each monitoring location, two video cameras shall be installed and used to ensure that full video files are available in the event that technical difficulties affect one of the cameras. The monitoring firm shall review the video files to verify the accuracy of human counts.
- (4) Counts shall be noted and reported in 15-minute intervals during the count period.
- e. Trip Cap Exceedances

If the monitored trip count to and from the East Campus exceeds the Final Trip Cap in more than two consecutive monitoring periods, or more than two times in a 12-month period, or exceeds the Final Trip Cap by more than 10% in a single monitoring event, LADOT shall require the applicant to submit an amended TDM Plan ensuring that the Final Trip Cap shall not be exceeded. If the Final Trip Cap is exceeded after the TDM Plan has been amended once, LADOT shall inform the Department of City Planning. The Department of City Planning shall then initiate a Plan Approval process to reconsider the allowed uses and conditions on site, including student enrollment, required student busing, or any other necessary conditions to ensure compliance with this Mitigation Measure. The Department of City Planning shall also prepare subsequent environmental review as may be required under, and consistent with, CEQA. (MM TR-1)

- 39. **Transportation and Traffic:** The Project Applicant and Construction Contractor shall prepare a Construction Management Plan to minimize traffic flow interference from construction activities. The Final Construction Management Plan shall be submitted for review and approval to LADOT and shall include plans to accomplish the following:
  - a. Maintain existing access for land uses in the proximity of the Project site during Project construction.
  - b. Schedule deliveries and pickups of construction materials for non-peak travel periods.

100 S. Barrington Place/12001 W. Sunset Boulevard

- c. Coordinate haul trucks, deliveries, and pickups to reduce the potential for trucks waiting to load or unload for protracted periods of time.
- d. Minimize obstruction of through-traffic lanes on Barrington Place during construction at the East Campus, and on Bundy Drive during construction at the West Campus.
- e. Control construction equipment traffic from the contractors by flagmen to minimize circulation conflicts and obstruction of through-traffic lanes, specifically along Barrington Place during construction at the East Campus and on Bundy Drive during construction at the West Campus.
- f. Designate transportation routes for heavy trucks and haul trucks to be used over the duration of the Project construction.
- g. Schedule vehicle movements to ensure that there are no vehicles waiting off site and impeding public traffic flow on the surrounding streets.
- h. Establish requirements for loading/unloading and the storage of materials on the Project site, where parking spaces can be encumbered, length of time traffic travel lanes can be encumbered, and sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses.
- i. Coordinate with adjacent businesses, land uses, and emergency service providers to ensure adequate access exists to the Project site and neighboring land uses.
- j. Submit for review, and obtain LADOT's approval of the Final Construction Management Plan no later than 30 days prior to commencement of construction. (MM TR-2)
- 40. **Utilities—Water:** The Project shall incorporate efficient landscaping irrigation systems. Landscape design features shall include the following:
  - a. Expanded use of high efficiency-irrigation systems, including weather-based irrigation controllers with rain shutoff technology or smart irrigation controllers for any area that is either landscaped or designated for future landscaping;
  - b. Use of water-efficient landscaping, such as proper hydrozoning, turf minimization, and use of native/drought-tolerant plant materials that would comply with the City's landscaping design regulations, as applicable; and
  - c. Metering and monitoring of all new and existing landscape irrigation systems.
  - d. Use of artificial turf on the Middle School Athletic Field. (PDF W-1)
- 41. **Utilities—Water:** The Project shall incorporate efficient water systems and fixtures in its new buildings and buildings to be renovated. Project Design Features shall include the following:
  - a. All new buildings shall include high-efficiency plumbing fixtures, including low-flow lavatory faucets with a flow rate of 0.2 gallons per cycle; kitchen faucets with a flow rate of 1.8 gallons per minute; and high-efficiency toilets (1.28 gallons per flush) and urinals (0.125 gallons per flush).
  - b. The domestic and fire water supply lines shall be rerouted and a fire water loop system on both the East and West Campuses shall be developed. The quantity of water (gallons per minute) necessary for fire protection would be based on City-established fire flow requirements established with the Fire Department upon building permit review, but at a minimum shall be designed to provide a residual water pressure of 20 pounds per square inch in the water system while the required gallons per minute is flowing.
  - c. The existing 6-inch domestic water main, which has a current point of connection to the City meter on street, shall be protected in place and shall be used for the expanded Campus development. The currently available water pressure of 195 pounds per square inch, the 6-inch-line size, and the proximity of the newly

developed facilities make it adequate to serve the Campus through the currently planned phases.

- d. Pressure regulators and discrete water meter monitoring stations shall be provided to record the monthly water consumption of each building. These meter stations shall be integrated into the Campus-wide energy management and control system to facilitate periodic reporting and auditing of individual and overall Campus water use.
- e. The Project shall meet all then-current applicable minimum standards for on- and offsite domestic and fire flow requirements as determined by the City through the building process and shall upgrade on- and off-site facilities as needed to meet such requirements. (PDF W-2)
- 42. **Utilities—Solid Waste:** The following Project Design Features shall be implemented as part of the Project to reduce the solid waste generation during Project construction:
  - a. During demolition, renovation, and new construction of Phase I, a minimum of 65 percent of the nonhazardous demolition and construction debris by weight from construction of new Project buildings shall be recycled and/or salvaged for reuse.
  - b. In keeping with City standards, during demolition, renovation, and new construction after 2020, a minimum of 75 percent of the nonhazardous demolition and construction debris by weight from construction of new Project buildings shall be recycled and/or salvaged for reuse.
  - c. During grading and construction, the Applicant shall provide separate bins for recycling of construction materials and brush on site. The Applicant shall contract with a City-approved hauler to facilitate the recycling of all construction recoverable/recyclable material.
  - d. The Applicant shall implement a program to purchase materials that have recycled content for Project construction and/or operation (i.e., plastic, lumber, office supplies). The program may include requesting suppliers to show recycled materials content. To verify compliance, the Applicant shall develop an integrated Solid Waste Management Program (SWMP), including recommended source reduction, recycling, composting programs, and/or a combination of such programs. (PDF SW-1)
- 43. **Utilities—Solid Waste:** Prior to any increase in students on the East Campus, the Applicant shall develop and implement an operational SWMP. The program shall identify the projected amount of waste generated on site during the operational phase of the Project. The program shall include but is not limited to the following measures:
  - a. All habitable structures shall be designed and equipped with clearly marked, durable, source-sorted recycling bins to facilitate the separation and deposit of recyclable materials.
  - b. Primary collection bins shall be designed to facilitate mechanized collection of such recyclable wastes for transport to on- or off-site recycling facilities.
  - c. The Applicant shall continuously maintain in good order clearly marked, durable, and separate recycling bins to facilitate the deposit of recyclable or commingled waste paper, metal, cardboard, glass, and plastic therein; maintain accessibility to such bins at all times for the collection of such wastes for transport to on- or off-site recycling plants; and require waste haulers to utilize local or regional material recovery facilities.
  - d. Solid waste generation during Project construction as well as during long-term Project operations shall be conducted in a manner consistent with current recycling practices required by the Bureau of Sanitation, including the sorting of recyclables by any third-party vendors.

- e. A green waste source reduction program shall be implemented, focusing on recycling of all green waste generated on site. (PDF SW-2)
- 44. Utilities—Wastewater: Prior to the development of a new building, the capacity of the on-site sanitary sewers serving the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards, and new sanitary sewer lines and connections shall be installed on site as necessary to accommodate proposed flows. (PDF WW-1)
- 45. Utilities—Wastewater: Necessary Project sanitary sewer lines and connections shall be designed and constructed to conform to the applicable Bureau of Sanitation and California Plumbing Code standards. (PDF WW-2)
- 46. **Greenhouse Gas Emissions:** The Applicant shall implement the following practices to reduce vehicle trips and related emissions:
  - a. Incentives for faculty and staff to carpool, with awards and information on display on bulletin boards within the offices.
  - b. Preferential and accessible carpool, vanpool, and bus drop-off and pickup areas.
  - c. Bicycle parking facilities, including safe bicycle access from the street to these facilities.
  - d. Carpool/vanpool loading areas.

These practices are included in the TDM discussed in greater detail in Section IV.J, Transportation and Circulation, and overall would result in a mobile source greenhouse gas emissions reduction of 30 percent. (PDF GHG-1)

- 47. **Greenhouse Gas Emissions:** Environmentally sustainable design features shall be incorporated into new buildings on both Campuses, sufficient to achieve the Leadership Environmental Engineering and Design program (LEED) Silver level. Some features that could be used to assist in meeting LEED certification include but are not limited to the following:
  - a. LED site lighting.
  - b. Building management system to control heating, ventilation, and air conditioning (HVAC) and lighting.
  - c. Skylights where possible to use natural light for illumination.
  - d. Tree planting in landscaped areas and street setbacks throughout the site. The landscaping shall include shade trees (such as evergreens) along the property boundaries. There shall also be shade and screening trees interior to the Project site.
  - e. Provisions for future access, off-grid prewiring, and space for electrical solar systems with a goal of at least 20 percent renewable energy supply for the Project and existing Campus.
  - f. Smart grid energy management system and smart grid-compatible technologies to reduce the energy demand and promote energy storage to reduce peak energy demand.
  - g. Low-flow water faucets and showers for gymnasium locker rooms.
  - h. Low-flow toilets.
  - i. Water-efficient irrigation and drought-tolerant landscaping. (PDF GHG-2)
- 48. Public Services—Fire Protection and Emergency Medical Services: The Applicant shall incorporate fire protection and emergency response design features. Prior to the

issuance of a building permit, a plot plan and other design specifications shall be submitted to LAFD for approval including:

- a. An alarm system.
- b. Fire access lanes driveways and turnarounds throughout the Campuses.
- c. Fire hydrant locations.
- d. Sprinkler system specifications.
- e. Separate meters and backflow prevention devices for fire and domestic services.
- f. The domestic and fire water supply lines shall be rerouted to occur, and a fire water loop system on both the East and West Campuses will be developed.
- g. On the East Campus, a new 8-inch fire water line north of the Project's Middle School Classroom Building shall connect with the existing 6-inch water line at Layton Drive. A second, internal fire water loop system shall surround the existing South Quad and the Project's Northeast Classroom Building and shall provide fire flow service to all buildings and on-site fire hydrants.
- h. On the West Campus, a new 6-inch fire water line shall create a loop by connecting to the existing LADWP 8-inch water lines (LADWP) in both Saltair Avenue and Bundy Drive. Fire water service can be provided to all buildings and on-site fire hydrants from this new system. An additional fire hydrant or fire department connections may be required at the northeast portion of the site, which will be based on future design coordination with the LAFD.
- i. The quantity of water (gallons per minute) necessary for fire protection shall be based on City-established fire flow requirements established with the Fire Department upon building permit review, but at a minimum shall be designed to provide a residual water pressure of 20 pounds per square inch in the water system while the required gallons per minute is flowing.
- j. The Project shall meet all then-current applicable minimum standards for on-and offsite domestic and fire flow requirements as determined by the City through the building process and shall upgrade on- and off-site facilities as needed to meet such requirements. (PDF FP-1)
- 49. **Public Services—Police Protection:** During construction, the Applicant shall provide private security measures including security fencing, lighting, and locked entries around the construction zones, and shall provide regular security patrols on both Campuses to inspect the construction access areas. (PDF PS-1)
- 50. **Public Services—Police Protection:** The Applicant shall submit site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design standards that enhance police protection and meet the Design Out Crime guidelines, including but not limited to adequate public lighting, landscaping, walkways, and buffering that provides visual access and safety. (PDF PS-2)
- 51. **Public Services—Police Protection:** Upon completion of the Project, the Applicant shall provide the LAPD West Bureau with diagrams of each of the Campuses that show the Campus layout, access points, locations of security stations, and the keys to any locked access gates. (PDF PS-3)
- 52. **Public Services—Police Protection:** The Applicant shall increase safety by eliminating the existing pedestrian conflicts with vehicles associated with students crossing the existing South and North Surface Parking Lots of the East Campus. (PDF PS-4)

- 53. **Public Services—Police Protection:** The Applicant shall install new security fences, as appropriate, and an emergency alarm system. (PDF PS-5)
- 54. **Public Services—Police Protection:** On the East Campus, the Applicant shall install a gated opening along Sunset Boulevard, which would be used only for Emergency Access through the Middle School Athletic Field. (PDF PS-6)
- 55. **Public Services—Police Protection:** The Applicant shall provide a gated entrance at the opening of the new driveway along Barrington Place, which would be used to access the parking garages to be located under the Project's Middle School Classroom Building and the Upper School Arts Building. (PDF PS-7)
- 56. **Public Services—Police Protection:** The Applicant shall continue to maintain a closed Campus requiring all visitors, guests, and vendors to have appointments prior to being granted access. Full-time security guards shall continue to be provided during all Campus hours of operation. (PDF PS-8)

#### K. Administrative Conditions:

- 1. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review or approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning for placement in the subject file.
- 2. **Code Compliance.** Area, height and use regulations of the zone classification of the subject property shall be complied with, except as modified by conditions of this grant.
- 3. Covenant and Agreement. Prior to the issuance of any permits relative to this matter, a Covenant and Agreement concerning all the information contained in these conditions, including the Exhibits, shall be recorded in the County Recorder's Office. The Covenant and Agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Planning Department for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Planning Department for attachment to the file.
- 4. **Definition.** Any agencies, public officials or legislation referenced in these conditions shall mean those agencies, public officials, legislation or their successors, designees or amendment to any legislation.
- 5. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning and any designated agency, or the agency's successor and in accordance with any stated laws or regulations, or any amendments thereto.
- 6. **Building Plans.** The grant pages and all the conditions of approval of the approved entitlements shall be printed on the building plans submitted to the Department of City Planning Department and the Department of Building and Safety.
- 7. **Indemnification and Reimbursement of Litigation Costs.** Applicant shall do all of the following:

- a. Defend and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify of annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.
- b. Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgment or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.
- c. Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than \$25,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- d. Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (b).
- e. If the City determines it necessary to protect the City's interests, execute the indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify, or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event that Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

- 8. Project Plan Modifications. Any corrections and/or modifications to the project plans made subsequent to this grant that are deemed necessary by the Department of Building and Safety or other Agency for Code compliance, and which involve a change in site plan, floor area, parking, building height, yards or setbacks, building separations, or lot coverage, shall require a referral of the revised plans back to the Department of City Planning for additional review and final sign-off prior to the issuance of any building permit in connection with said plans. This process may require additional review and/or action by the appropriate decision making authority including the Director of Planning City Planning Commission, Area Planning Commission, or Board.
- 9. Mitigation Monitoring. The Applicant shall identify mitigation monitors who shall provide periodic status reports on the implementation of the Environmental Conditions specified herein, and in accordance with the Mitigation Monitoring Program, as to the area of responsibility, phase of intervention (pre-construction, construction, post-construction/maintenance) to ensure continued implementation of the Environmental Conditions.
- 10. **Utilization of Approval**. The privileges of this approval shall be considered utilized upon the earlier of (1) the School's implementation of the operational conditions of this Vesting Conditional Use grant following recordation of the City Covenant acknowledging and agreeing to comply with the terms of this Vesting Conditional Use grant; (2) placement and maintenance of a sign as set forth in LAMC Section 12.25.A.3.a for independent schools; or 3) issuance of a building permit or other permit from the Department of Building and Safety for development of new facilities authorized by this Vesting Conditional Use grant.

### FINDINGS

#### A. General Plan/Charter Findings

- <u>General Plan Land Use Designation</u>. The subject property is located within the area covered by the Brentwood–Pacific Palisades Community Plan, updated and adopted by the City Council on June 17, 1998. The Plan designates the subject property as Very Low II Residential with corresponding zones of RE15 and RE11 for the East and West campuses, respectively. The existing zoning is consistent with the land use designation of the General Plan, as reflected in the adopted community plan.
- 2. <u>General Plan Text</u>. The Brentwood–Pacific Palisades Community Plan text includes the following relevant land use goals, objectives, policies and programs:

## Goal 6 APPROPRIATE LOCATIONS AND ADEQUATE FACILITIES FOR SCHOOLS TO SERVE THE NEEDS OF EXISTIING AND FUTURE POPULATION.

**Objective 6-1** To site schools in locations complementary to existing land uses and community character.

**Policy 6.1.1** Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character.

**Program:** A decision maker involved in a discretionary review for a proposed school should adopt a finding which supports the application of this policy.

The Project has and will continue to meet the above goal, objective, and policy of the Community Plan by providing for improving existing school sites as needed in order to serve the existing community. The Brentwood School Education Master Plan will provide upgraded and regionally competitive campuses for K through 12<sup>th</sup> graders. The existing independent school and new development on the subject properties to accommodate the Brentwood School will provide an alternative to public schools in the area and enhance the attractiveness of an institution that has operated in a compatible manner with the existing community for many years.

The Project includes an upgrade to its educational, athletic, and arts facilities, as well as moving parking and vehicular circulation within covered structures on the East Campus to improve the safety and walkability of the Campus and buffer impacts with adjoining residential and commercial uses. Both campuses serve as a base of students that will benefit from the Brentwood School Education Master Plan. The design and layout reflect a consideration of the School's relationship to adjacent residential uses. All new buildings have been properly sited with placement of the vehicular access, drop-off areas, and parking in such a manner that potential noise and view impacts on nearby residences are minimized. Moreover, the architectural design of the buildings maintains an appropriate scale with the neighborhood and focuses activity away from the periphery of the campuses. As such, Staff finds that approval of the Brentwood School Master Plan would encourage compatibility in school locations, site layout, and architectural design with adjacent land uses and community character.

- <u>Charter Findings</u>: Pursuant to Section 556 of the City Charter, the subject Vesting Conditional Use Permit is in substantial conformance with the purposes, intent, and provisions of the General Plan. The Los Angeles Municipal Code (the "LAMC") permits the filing, review, and determination of a Conditional Use Permit ("CUP") as outlined in Section 12.24. The required findings of fact are made herein.
- B. Vesting Conditional Use Permit Findings for Implementation of the Education Master Plan with Relief from Maximum Height, Yard Setback Requirements and Conditional Use Permit Findings for the Child Care Facility on the West Campus:
  - 1. The project will enhance the built environment in the surrounding neighborhood or will perform a function or provide a service that is essential or beneficial to the community, city, or region.
    - a. Education Master Plan

The East Campus and West Campus have been used for educational uses since the 1930 and 1947, respectively, and the residential neighborhoods have grown around the campuses over time. With implementation of the Project, Brentwood School will continue to attract students from the greater Los Angeles area and provide enhanced educational resources for the community. The campuses are located in an urbanized portion of the City. Surrounding uses include single- and multi-family residential uses, religious institutions and schools, and neighborhood-serving commercial uses in Brentwood Village near the East Campus. As part of the Project, the new and replacement buildings will be designed to complement the existing campuses' layouts and with respect to the residential scale and character of the surrounding uses by topography, distance between buildings, and landscaping.

The Project will enhance the functionality of the campuses and allow for the modernization of the existing buildings, the replacement of existing buildings that will become obsolete over time, and the construction of new buildings needed to enable the school to maintain its academic endeavors. It will also allow the relocation of the 6th grade to a new, self-contained Middle School building on the East Campus, where adolescents can experience core academics, a range of arts and other elective classes, and a competitive athletics program.

The Campuses will be improved to enhance their visual appeal, as well as to create compatibility with the existing scale and character of the surrounding community. Construction will take place within the present boundaries of the campuses in consideration of the existing neighborhoods. In addition, the Project has been designed to limit views of the new facilities from the surroundings, maintain openness with the athletic field near Sunset Boulevard, and orient Campus activity toward the center of the existing Campuses' cores, which will shield neighbors from noise generated on the campuses.

The proposed enhancement to existing and addition of new classroom space and facilities will support the school's academic mission. Enrollment will not be increased at the West Campus, and the increase in enrollment at the East Campus will not increase peak hour trips through implementation of a stricter Transportation Demand Management ("TDM") Program. Parking

and traffic impacts have been mitigated consistent with requests from involved homeowners' organizations.

The Project will further enhance the built environment by relocating the main vehicular access to the East Campus approximately 120 feet farther from the intersection of Barrington Place/Sunset Boulevard and restriping Barrington Place. This will improve circulation, queuing, and traffic flow, and provide refuge for left-turning vehicles entering the Campus, relieving the congestion experienced at this intersection. The location of the existing and proposed driveways will allow Campus traffic to avoid residential neighborhoods. In addition, the Middle School Classroom Building parking structure on the Middle School Athletic Field will include areas for pick-up and drop-off within the structure. This pick-up and drop-off will be accomplished fully on site and will not adversely affect circulation on City arterials. More area will be available for off-street queuing in the forecourt of the new Middle School Classroom Building.

Access to the West Campus will continue to be provided at the Bundy Drive driveway with ingress near the intersection of Bundy Drive and Sunset Boulevard and egress near the northwest corner of the Campus, opposite the T-intersection of Bundy Drive and Bonny Lane. This driveway will provide access into and out of the parking garage below the Arts and Athletics Building. West Campus traffic will enter and exit the Campus through this driveway, and all drop-off/pickup activity will take place within the Campus, avoiding any queuing on public streets. Alternate access for some staff and visitors is currently provided from Saltair Avenue, but implementation of the Brentwood Master School Plan will limit this access to drop-offs and pickups for the employee childcare center.

The Project will also enhance the built environment in the surrounding neighborhood by providing visually unified campuses with buildings that respect the scale and character of the surrounding area, enhanced landscaping, and greening of the streetscape, and covered or underground parking to reduce noise, shield cars from view, and improve circulation on and around the Project Site. The Project will be consistent with the scale and character of the surrounding residential neighborhood. Additionally, the Project will replace existing surface parking lots with facilities scaled to the residential character of the surrounding neighborhood and will accommodate nearly all on-campus parking within new parking structures. Also, the open space on the campuses will be maximized to provide landscaping and buffers from the adjacent neighbors, and buildings will be oriented to shield neighboring properties from School activities on each of the two campuses.

The single-family uses adjacent to the campuses are located on relatively large lots with large side and rear yard setbacks. In addition to the yard setbacks on the adjacent properties, on the East Campus a 45-foot buffer will be provided at the property line adjacent to the single-family homes to the northeast on Layton Drive and Woodburn Drive, and on the West Campus, the School buildings are setback approximately 29 feet from the single-family homes to the north.

The buildings and the open space areas are designed to complement the core of the campuses while maintaining depth of setbacks, articulation, and landscape that respects the residential scale and character of the surrounding area. Massing of the buildings will take advantage of the arroyo setting and the arrangement of the existing core of the East Campus. Specifically, the Middle School Building on the East Campus will be located on the bottom of the arroyo and built into the adjoining slope so that it will appear as a three-story building from Barrington Place

similar to the existing nearby residential and commercial uses across Barrington Place. The Northeast Classroom Building's two-story height will be consistent with the height of single family homes to the north. Further, the building will be set back 45 feet from the property line, and the School will plant trees well in advance of commencing construction so that the building will be screened from abutting residential uses with mature evergreen trees. Other than the new Middle School Classroom Building, all buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography.

On the West Campus, the three additional two-story buildings will be generally within the footprints of existing buildings and will be designed to complement the existing Campus and surrounding area. The proposed building heights and massing, along with the architecture, site planning, setbacks, and landscaping will be compatible with the overall character of the area as differences in terrain, and existing and proposed landscaping, will reduce the visibility of the new buildings. The setbacks and landscaping will also provide a visual buffer for the surrounding area.

The Project will use existing and new on-site landscaping to contribute to the environment, increase pedestrian comfort, add visual relief to the street views, and provide natural barriers around the perimeter of each campus. New landscaping and landscaped gardens, courtyards, plazas, seating areas, and walkways will be located throughout the campuses; these features will contribute to the sense of openness. In addition, the School will continue to maintain a closed Campus requiring all visitors, guests, and vendors to have appointments prior to being granted access.

Finally, with approval of the CUP for both campuses, the School will continue to be subject to numerous restrictions on operations, which will ensure that the School's operations and its facilities remain compatible with the surrounding neighborhoods.

Accordingly, for the reasons discussed above, the Project will enhance the built environment in the surrounding neighborhood and will perform a function and provide a service that is essential and beneficial to the community, City, and region.

b. West Campus Employee Childcare Facility

Pursuant to LAMC Section 12.21-W.51, Brentwood School requests approval of a CUP to permit the continued use of an existing childcare facility in the RE15-1 zone. The childcare facility would continue to take place on the West Campus and will ultimately be located in the new Saltair Annex building. As part of the Brentwood School Education Master Plan, exterior improvements to the Project Site will include upgraded open space areas to improve the safety and quality of the childcare facility play areas. Upon completion of the Phase I of the Project, the childcare facility will include approximately 660 square feet of floor area.

The childcare facility will be located in a new two-story building called the Saltair Annex that will be generally located within the footprint of an existing building and the existing surface parking lot on Saltair Avenue, and will be designed to complement the existing Campus and surrounding area. The proposed building height and massing, along with the architecture, site planning, setbacks, and landscaping will be compatible with the overall character of the area as differences in terrain and existing and proposed landscaping will reduce the visibility of the new

buildings. The setbacks and landscaping will also provide a visual buffer for the surrounding area.

The childcare facility will perform a function and provide a service that is essential and beneficial to the community by providing a childcare facility on-site for faculty and staff in need of childcare services. Increasingly, working parents desire childcare options near their place of employment and, moreover, numerous studies have shown that providing childcare near work is linked to higher job performance, greater worker productivity, employee retention and reduction in turnover, and greater overall job satisfaction. Further, providing childcare services on site will assist in reducing vehicle trips along the congested Sunset Boulevard corridor.

Finally, with approval of the CUP for a childcare facility on the West Campus, the School will continue to be subject to numerous restrictions on operations, which will ensure that the childcare operations and facilities remain compatible with the surrounding neighborhoods.

Accordingly, for the reasons discussed above, the Project will enhance the built environment in the surrounding neighborhood and will perform a function and provide a service that is essential and beneficial to the community, City, and region.

- 2. That the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.
  - a. Education Master Plan

Schools are permitted to, and frequently do, use residentially-zoned properties for school purposes. Many private schools throughout the City are located in single-family residential neighborhoods. Recognizing that schools are in residential neighborhoods, close to children, the LAMC allows private schools to use residential properties for school purposes through a CUP. Accordingly, private school uses are permitted on both campuses by CUP in the RE11 and RE15 zones, pursuant to LAMC Sections 12.24-T.3(b) and 12.24-U.24(b). Approval of a CUP for the Education Master Plan will not adversely affect the neighborhoods or public health, safety, and welfare, as it will facilitate the continued use of the campuses as an independent school.

In connection with approval of the existing CUPs for the campuses, the City has already determined that the Project's location, size, height, operation, and other significant features will be compatible with, and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The Project will not adversely affect or degrade adjacent properties. The Project will enhance the existing School function and appearance within the two campuses. Each campus will be enhanced within the existing boundaries to include new buildings of similar character and scale as the existing buildings with a network of on-site circulation designed to promote pedestrian activity and safety. Building roofs will generally be flat, with some parapets. The buildings and the open space areas are designed to complement the core of the campuses while maintaining depth of setbacks, articulation, and landscape that respects the residential scale and character of the surrounding area. At full buildout, all surface parking lots on the East Campus, on land owned by the School, will be replaced with garages situated below the Middle School Classroom Building, Middle School Athletic Field, and Upper School Arts Building. This will enhance the residential character by further buffering residential uses from potential noise and visual effects of parking areas.

The existing zoning and height district will allow a maximum floor area ratio (FAR) of 3 to 1 on each campus. The Education Master Plan will bring the FAR to approximately 1.2 to 1 on the East Campus and approximately 0.48 to 1 on the West Campus.

The East Campus is zoned RE15-1. LAMC Section 12.07.01-C.5, adopted as part of the Baseline Mansionization Ordinance, limits the Residential Floor Area in the RE15 zone to 35 or 40 percent of the lot area. As the Project would not result in the introduction of residential uses or construction of residential floor area on the East Campus, the limitations of LAMC Section 12.07.01 do not apply. Rather, the standard FAR of 3 to 1 would apply. As described further below, the Project's design will ensure that its size and appearance is compatible with the surrounding scale and character of the neighborhood.

LAMC Section 12.24-F allows the City decision-maker, in this case the City Planning Commission, to specify project-specific height and area regulations as part of the CUP approval. The Applicant is seeking project-specific height and yard setback requirements that differ from those under the RE11 zoning on the East Campus. Additional height is required due to the nature of the uses (e.g., gymnasiums and performing arts venues with tall ceilings) and the sloping topography of the site. However, massing of the buildings will take advantage of the arroyo setting and the arrangement of the existing core of the East Campus. Specifically, the Middle School Classroom Building on the East Campus will be located on the bottom of the arroyo and built into the adjoining slope so that it will appear as a three-story building from Barrington Place and complement existing adjoining residential and commercial uses. The Northeast Classroom Building's two-story height will be consistent with the height of singlefamily homes to the north. Further, the building will be set back 45 feet from the property line, and, as required by Project Design feature PDF-AES-3, the School will plant trees one year in advance of commencing construction so that the building will be screened from abutting residential uses with mature evergreen trees. Other than the new Middle School Classroom Building, all buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography.

The Applicant is also seeking to have project-specific yard setback requirements in lieu of the standard requirements for the RE11 zoning, which were designed for single-family estate homes. The single-family uses adjacent to the Campus are located on relatively large lots with large side and rear yard setbacks. In addition to the setbacks on the adjacent properties, on the East Campus a 45-foot landscaped buffer will be provided at the property line adjacent to the single-family home to the north on Layton Drive. The Applicant is seeking a 0-foot yard setback (on the Barrington Place side of Campus), and a zero-foot yard setback adjacent to the VA property. The zero-foot yard setback request along Sunset Boulevard is to accommodate the Middle School Classroom Building and Middle School Athletic Field. The general purpose of yard requirements is to maintain uniformity of appearance and to buffer adjacent sensitive uses. In this case, most of the frontage along the east side of Sunset Boulevard on the block south of the Project Site consists of apartments that are built very close to the street. Similarly, the single-family homes on the east side of Sunset north of the Project Site have minimum yards ranging

from 0 feet to 7 feet. In contrast, the Middle School Classroom Building will occupy a portion the Project's Sunset Boulevard frontage, with the rest devoted to the athletic field. Moreover, the single-family homes to the west are buffered by Sunset Boulevard, which is approximately 70 feet wide. In addition, two of the three homes on Sunset Boulevard closest to the Middle School Classroom Building face Barrington Avenue and are further buffered by their own large rear yards.

The partial zero-foot yard setback request along the southern property line is to accommodate the Upper School Arts Building, which is designed as a "U-shaped" building opening onto the Campus, so that it is fully integrated with the rest of the Campus facilities. The properties adjacent to that portion of the southern property line where the zero -foot yard setback is requested are commercial properties for which yard setbacks are not required, so a zero -foot yard setback would be consistent with the requirements of the adjacent zoning. Moreover, these commercial parcels are improved with businesses that front on Barrington Place and would not view onto the Campus. The zero -foot yard setback adjacent to the VA property is requested to accommodate the existing condition wherein the School uses the VA property as an integrated part of the overall Campus. This portion of the VA property is currently improved with several of the School's athletic uses and parking. As this portion of the VA property is integrated into the Campus, a zero -foot yard setback is appropriate.

The West Campus is located in a designated Hillside Area. In 2011, the City Council adopted the Baseline Hillside Ordinance (Ordinance No. 181,624) ("BHO"), which is codified in LAMC Section 12.21-C.10. The BHO was adopted to regulate the scale and massing of single-family homes in single-family zones in Hillside Areas. The BHO regulates yard setbacks, Residential Floor Area, height, lot coverage, grading, off-street parking, fire protection, street access, and sewer connections. Several of the BHO's requirements expressly apply to residential uses or single-family home (i.e., Residential Floor Area, off-street parking, fire protection, street access, and sewer connections). Although the BHO was intended primarily to address out-of-scale single-family homes, the Planning Department has determined that the requirements of the BHO that are not expressly limited to single-family homes or residential uses apply to private schools and other non-residential uses in the Hillside Area. Therefore, the West Campus is subject to the setback, height, lot coverage, and grading regulations of the BHO.

LAMC Section 12.07.01-C.5 allows for a maximum residential floor FAR of 0.35 to 1 for sites located in the RE15 zone and in a Hillside Area. As is evident from the name, this more restrictive FAR only applies to residential uses. While the West Campus is located in the RE15 zone and a Hillside Area, it would not result in the introduction of residential uses or construction of residential floor area. Therefore, the FAR limitation on Residential Floor Area under LAMC Section 12.07.01-C.5 would not apply to the West Campus. Rather, the standard FAR of 3 to 1 would apply. As described further below, the Project's design will ensure that its size and appearance is compatible with the surrounding scale and character of the neighborhood.

The Applicant is also seeking project-specific height for the West Campus pursuant to LAMC Section 12.24-F. The Applicant is seeking project-specific height requirements that are less restrictive than those under the RE15 zoning on the West Campus. The additional height is required due to the varying topography of the site. However, massing of the buildings will take advantage of the sloping topography and the arrangement of the existing core of the West Campus. The new buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography.

Implementation of the Project at the West Campus includes new structures that will replace existing structures and will be situated generally along the perimeter of the Campus, shielding the neighborhood from noise and activity from within the Campus central open area. With the landscaped slope along the perimeter at the south and west sides and the setback of the Saltair Annex from Sunset Boulevard, views of the West Campus buildings will be limited from vantage points along Sunset Boulevard. The building scale will be consistent with the existing buildings on the Campus, as well as with the two-story residential units in the area, and St. Martin of Tours Church and School directly across the street on Saltair Avenue. The new buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography.

Fences, walls, and landscaping along the perimeters of both campuses are proposed to provide additional buffering and shielding for the benefit of nearby properties.

In addition to the education the School provides, the existing TDM program provides strategies to reduce the traffic impacts of operating a school. The School's existing Conditional Use Permits (ZA-1992-372-CUZ and ZA-1978-108-CU-PAD) impose strict transportation conditions. The existing TDM plans for both campuses currently requires multi-modal travel (i.e., buses, carpools, bicycles, walking, etc.) and provides incentives for use of non-personal vehicle arrival. The School's TDM program for the East Campus encourages transportation options for getting to the School and serves to reduce the number of trips to and from the Campus. As part of TDM program, Brentwood School will include an expanded use of busing operations to transport students to and from School to eliminate any increase in A.M. or P.M. peak hour trips even with the additional enrollment. Students who do not ride the buses, walk, or travel by bicycle during the peak hours must be dropped off or picked up via either a parent-driven carpool or a studentdriven carpool. Parking for student drivers is permitted on Campus. In addition, each student and employee is required to choose and register for a mode of transportation annually. The TDM program includes a detailed written and signed agreement between parents/students and Brentwood School to define personal arrival types. All students also pay a yearly School fee to support the School's busing program. The School informs parents, students, faculty, and staff in writing on an annual basis of all rules regulating School traffic and parking in accordance with the TDM program.

The School currently implements a transportation management program for the West Campus to promote carpooling and achieve a minimum average vehicle ridership ("AVR") of 2.5. These measures will be further developed for the future program to achieve a minimum AVR of 3.0 including, but not limited to, increased bus ridership, additional buses, added carpool ridership, and increased incentives. In addition, the School requires any school-operated van or bus and all other vehicles transporting students to park, load, and unload within the campuses. Furthermore, van, bus, and parent drop-off is prohibited on neighboring residential streets.

As part of the Education Master Plan, the EIR identified Mitigation Measure MM-TR-1 to require the School to achieve a "zero net increase" in School-related traffic during the peak hours. As conditioned, the East Campus will be subject to a trip cap based on currently existing traffic levels. Trip counts will be conducted on the East Campus twice annually, and the School will be subject to penalties and revisions of their plans if the Trip Cap is exceeded.

The Project will implement a number of measures to reduce potential impacts during construction, including installing noise curtains at the property line with sensitive receptors and

generally limiting construction vehicle traffic to the hours of 9:00 A.M. to 2:30 P.M. to avoid peak hour impacts, as required in the EIR by Project Design Feature PDF TR-7. In addition construction workers will be prohibited from parking on public streets, and all construction vehicle traffic will use the Veterans Administration ("VA") property to access the East Campus, as long as the VA continues to allow such access. If not, alternate haul routes would expose sensitive receptors along City streets to a significant and unavoidable impact due to annoyance from the vibrations caused by the haul trucks; this is identified as such in the EIR.

The Project, as proposed, will improve the functionality of the School, but consideration should be given to the adjacent residents and surrounding community in terms of the future expectations of the School. Therefore, a multi-phase master plan with staggered implementation is appropriate for this location and its operation.

For the reasons stated above and throughout these findings, the Project's location, size, height, operation, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

#### b. West Campus Childcare Facility

Childcare facilities are permitted to, and frequently do, use residentially-zoned properties to provide for the care of children who are primarily children of employees or businesses in the vicinity. Recognizing that childcare facilities are in residential neighborhoods, close to children, the LAMC allows childcare facilities to use residential properties through a CUP. Accordingly, childcare facility uses are permitted on the West Campus CUP in the RE15 zone pursuant to LAMC Sections 12.24-W.51. Approval of a CUP for a childcare facility associated with the Education Master Plan will not adversely affect the neighborhoods or public health, safety, and welfare, as it will facilitate the continued use of the Campus as an independent school with a childcare facility for employees.

The childcare facility will continue to take place on the West Campus and will ultimately be located in the new Saltair Annex building. As part of the Brentwood School Education Master Plan, exterior improvements to the Project Site would include upgraded open space areas to improve the safety and quality of the childcare facility play areas. Upon completion of the Phase I of the Project, the childcare facility will include approximately 660 square feet of floor area.

The existing zoning and height district would allow a maximum FAR of 3 to1 on each campus. The Education Master Plan will develop approximately 20 percent of the West Campus. LAMC Section 12.07.01-C.5 allows for a maximum residential floor FAR of 0.35 to 1 for sites located in the RE15 zone and in a Hillside Area. As is evident from the name, this more restrictive FAR only applies to residential uses. While the West Campus is located in the RE15 zone and a Hillside Area, it proposes only school and childcare uses and no residential uses. Therefore, the 0.35 to 1 limitation on residential floor area would not apply to the West Campus. Rather, the standard FAR of 3 to 1 would apply. As described further below, the Project's design will ensure that its size and appearance is compatible with the surrounding scale and character of the neighborhood.

The proposed building heights and mass, along with the architecture, site planning, setbacks, and landscaping are assessed in the following paragraphs in relation to the existing visual

character of existing development to the north, east, west, and south. The Project will take advantage of the topography of the site to minimize visual impacts. The new buildings complement the surrounding residential uses and will be of similar two-story height.

The State licensing requirements of 35 square feet of building space per child indoors and 75 square feet of outdoor space per child will be met. The childcare facility will operate during the work week and would be closed nights and weekends. In addition, the childcare facility would be limited to the children of employees of the School.

A circular driveway will provide an area for pick-up and drop-off along with four short-term parking spaces. Access to the parking below the Saltair Annex, which is the building intended to house the childcare facility, will be provided from Bundy Drive.

Exterior light sources associated with the childcare facility will consist of low-level lighting for security, wayfinding, architectural, and landscaping purposes. Lighting for the outdoor play area will be limited in the evening hours and only utilized when necessary. Lighting will be directed onto the areas to be lit and shielded to minimize light spillover effects. Lighting will meet all applicable LAMC lighting standards.

Finally, with approval of the CUP for a childcare facility on the West Campus, the School will be subject to numerous restrictions on operations, which will ensure that the childcare operations and facilities remain compatible with the surrounding neighborhoods.

For the reasons stated above and throughout these findings, the Project's location, size, height, operation, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

# 3. That the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The Brentwood-Pacific Palisades Community Plan designates the properties for Very Low II Residential land uses with corresponding zoning of RE15 and RE11, Height District No. 1. The subject properties are planned and zoned for single-family residential uses; however, private schools are conditionally permitted and the Community Plan recognizes the sites as occupied by the existing independent school.

The East and West Campuses have been used for educational uses since the 1930s and 1947, respectively, and the residential neighborhoods have grown around the campuses over time. They are located in an urbanized portion of the City. The Project does not involve a material change from the previously authorized conditional use. The proposed addition of classroom space and facilities will allow the continued school use. Enrollment will not be increased at the West Campus, and the increase in enrollment at the East Campus will not increase peak hour trips through implementation of a strict TDM pursuant to Mitigation Measure MM TR-1.

(i) General Plan Framework

Both campuses are currently designated for Very Low II Density Residential uses under the Community Plan and are largely surrounded by land designated for Low or Very Low II Density

Residential uses. According to the Framework Element, the primary goal for Low and Very Low Density residential areas is to preserve the City's stable single-family neighborhoods. As schools generally occur within residential neighborhoods and are allowed as a conditionally permitted use within the residential zoning designation, the Project is consistent with the land use and zoning designations. The Framework Element's Land Use Chapter includes the following objectives for maintaining the residential character of the area: (1) ensuring that the character and scale of stable single-family residential neighborhoods is maintained, allowing for infill development provided that it is compatible with and maintains the scale and character of existing development, and (2) allowing for the intensification of selected single-family areas that directly about high-density development as "transitions" between these uses. The Project's compatibility with specific goals, policies, and objectives of the Framework Element is provided in more detail in Table IV.H-1, Framework Element Compatibility of the Draft Environmental Impact Report (DEIR).

Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.

As noted previously, the East Campus land use designation is Very Low II Density Residential and is zoned as RE11-1. The West Campus is designated for Very Low II Density Residential land uses and is zoned as RE15-1. As set forth in Table 3-1 in the General Plan Framework, typical development characteristics of the Single-Family Residential category, which includes uses designated for Very Low II Residential, include the development of single-family dwelling units, as well as supporting uses such as parks, schools, and community centers. The Project involves the enhancement of existing facilities, construction of replacement buildings and construction of new buildings for the School within the existing East and West Campus boundaries. The Project will be consistent with the Single-Family Residential category from the Framework Element, as this category allows for the development of schools. Overall, the Project will be generally consistent with the General Plan Framework's guidelines.

Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.

The School's TDM program guides transportation options for arrivals to the School and serves to reduce the number of trips to and from the Campus. As part of the TDM program, Brentwood School will include an expanded use of busing operations to transport students to and from School to offset any trip increase during peak hours. Students, who do not ride the buses, walk, or travel by bicycle during the peak hours, must be dropped off or picked up via either a parent-driven carpool or a student-driven carpool. Parking for student drivers is permitted on the East Campus, provided that there are at least three students per vehicle. In addition, each student and employee is required to choose and register for a mode of transportation annually. The School informs parents, students, faculty, and staff in writing on an annual basis of all rules regulating School traffic and parking in accordance with the TDM program.

The School implements the transportation management program for the West Campus to promote carpooling and achieve a current AVR of 3.0, in excess of the required minimum AVR of 2.5.

Policy 3.5.2: Require that new development in single-family neighborhoods maintains the predominant and distinguishing characteristics, such as property setbacks and building scale.

The Education Master Plan will provide for improvement of the existing East and West Campuses, while maintaining the overall spatial relationships with the surrounding environment.

At the East Campus, the building will be situated around a central core of buildings and uses, with ample setbacks along the portions of the perimeter facing sensitive uses. New buildings will be setback at least 45 feet from the northeastern property line and will be shielded from neighboring properties by landscape screening. The new buildings will appear no taller than the existing predominant two-story single-family homes in the Layton Drive neighborhood. The Middle School Classroom Building will provide the most distinguishing characteristics because it will be located near the existing main entrance near the corner of Sunset Boulevard and Barrington Place. As this building will be located on the floor of the arroyo, it will appear as a three-story building from Barrington Place and adjacent offsite commercial and residential uses. The replacement of the Middle School Athletic Field with a new field on the roof of the parking garage will ensure that the predominantly open character currently seen along Sunset Boulevard will be largely maintained.

At the West Campus, the new and replacement structures will also maintain a scale and setbacks that are consistent with the character of the residential surroundings. New buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography.

Therefore, overall, the design of the Project will maintain the predominant and distinguishing characteristics regarding property setbacks and building scale of the adjacent residential properties.

(ii) Community Plan (Land Use Element)

The Project will also meet the applicable goals and objectives of the Community Plan, including the following:

- **Goal 4:** A Community with sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources.
  - **Objective 4-1:** To protect the resources of the Plan area for the benefit of the residents and of the region by preserving existing open space and, where possible, acquiring new open space.
  - **Policy4-1.1** Natural resources should be conserved on privately-owned land of open space quality and preserved on state parkland. City parks should be further developed as appropriate.
  - **Policy 4-1.4** Open Space land in the plan area should be utilized to provide camping and picnicking, hiking, bicycling and equestrian trails; and golf courses, sport fields

and other active recreational uses for residents of the Los Angeles region.

Goal 6:Appropriate locations and adequate facilities for schools to serve the<br/>needs of existing and future population<br/>Objective 6-1:Objective 6-1:To site schools in locations complementary to

existing land uses and community character

The Project will also further the following goals and objectives of the Community Plan:

- **Goal 11:** Encourage alternative modes of transportation to the use of single occupancy vehicles in order to reduce vehicle trips
  - Objective 11-1:To pursue transportation management strategies<br/>that can maximize vehicle occupancy, minimize<br/>average trip length, and reduce the number of<br/>vehicle trips.Policy 11-1.1Encourage public schools, private schools, and<br/>non-residential development to provide employee
    - non-residential development to provide employee incentives for utilizing alternatives to the automobile (i.e., carpools, vanpools, buses, flex time, telecommuting, bicycles, and walking, etc.).
- **Policy 13-1.2:** New development projects shall be designed to minimize disturbance to existing traffic flow with proper ingress and egress to parking.
- **Program:** Require that new development projects incorporate adequate driveway access to prevent auto queuing.
  - a. Education Master Plan

The East Campus and West Campus have been used for educational uses since 1930 and 1947, respectively, and the residential neighborhoods have grown around the campuses over time. The School will continue to be sited in a location that serves the needs of existing and future populations and will be designed to be compatible with the adjacent land uses and the scale and character of the community. Consistent with many schools throughout the City, the School will be located in a predominantly residential neighborhood. Upon completion of the Project, the proposed improvements would provide permanent and upgraded facilities to accommodate the educational needs of its students. Construction will take place within the present boundaries of the campuses to maintain the existing neighborhoods. In addition, the Project has been designed to limit views of the new facilities from the surroundings, will maintain openness with the athletic field near Sunset Boulevard, and will orient Campus activity toward the center of the existing campus cores, which will shield neighbors from noise generated on the campuses.

The Project's landscaped open space will further the goal of preserving open space to balance development. The Project will upgrade the campuses' recreational and physical health components to serve the students. Therefore, the Project will not increase demand for, or otherwise cause, constraints to existing community recreational, environmental, and health and safety facilities. Also, the design of the campuses to cluster buildings within previously

disturbed areas ensures that open spaces within the campuses (albeit privately owned) are largely maintained. With the use of the existing campus grounds to accommodate the School's student educational needs, the Project achieves this intent of open space goals and objectives because it avoids development pressure on the surrounding natural open space or fringe areas in the community that may be worthy of preserving for the open space benefit of the community residents.

As stated above, the Project includes a comprehensive TDM program that promotes ridesharing to reduce single-occupancy trips and the number of vehicle trips. As set forth in the Draft EIR, the School is required to establish both morning and afternoon trip caps, so that there will be no increase in traffic to and from the East Campus over existing measured levels during these time periods. Condition No. 9(b) is included to limit the East Campus use of gymnasiums and the Science Lecture Hall as a continuation of existing conditions on the site, so as to not increase traffic compared to existing conditions. The School will face enforcement mechanisms if the monitored vehicle counts exceed the applicable trip cap, including a mandated revision of its plans. To achieve compliance with the trip caps, the School will expand its TDM program to include a minimum busing/vanpooling requirement on the East Campus. In addition, students will be prohibited from parking in the VA lot adjacent to the East Campus. Notifications will be provided to all students and parents annually as to the proper access routes, carpooling rules, and hours assigned for drop off and pick up. These aspects of the Project's TDM program will achieve the transportation demand management goals and policies of the Community Plan.

On both campuses, pick-up and drop-off will take place wholly on-site. On the East Campus, a paved and landscaped forecourt facing onto Barrington Place would be created to provide a new front entrance to the School. This forecourt would accommodate part of the on-site queuing of vehicles, as well as providing a pedestrian entry from Barrington Place. In addition, the existing "Sunset Gate" on Barrington Place will be relocated approximately 120 feet farther away from the intersection of Barrington Place and Sunset Boulevard. From this relocated driveway, entering vehicles would proceed toward a new vehicular ramp that would lead cars to the new Middle School Classroom Building parking structure, where daily drop-offs in the mornings and pickups in the afternoons would take place. Access to the West Campus will continue to be provided from driveways on Bundy Drive and Saltair Avenue. The primary pick-up and drop-off location will be the driveway on Bundy Drive, which can accommodate over 20 vehicles. The Saltair Avenue driveway will be used for pick up and drop off for the childcare facility; it will have no access to the garage.

For the reasons stated above and as further discussed in Section IV.H, Land Use, of the DEIR, the Project substantially conforms to the purposes, intent, and provisions of the General Plan, the applicable Community Plan, and any applicable specific plan.

#### b. West Campus Childcare Facility

The childcare facility substantially conforms with the purpose, intent, and provisions of the General Plan, the applicable Community Plan, and any applicable specific plan. The School is located within the Brentwood–Pacific Palisades Community Plan area which designates the Site as Very Low II Residential with a corresponding zoning of RE15. Childcare facilities are conditionally permitted in the RE zone. The Site is not located within the area of any specific plans. The Community Plan does not specifically address childcare facilities; however, the LAMC authorizes the Zoning Administrator to grant the requested CUP in zones corresponding

to the Community Plan land use designation. The General Plan promotes the provision of services and facilities throughout the City in locations that are convenient to the public yet do not impact nearby properties.

The Community Plan identifies the need to provide useable open space for outdoor activities, especially for children. The Project will include playground improvements, which will include updating portions of the current layout to increase outdoor space, while minimizing hazards, and clearly identifying age-appropriate areas for each stage of development. Therefore, the childcare facility substantially conforms with the purpose, intent, and provisions of the General Plan.

4. Pursuant to Section 12.24.T.3(c)(1) of the LAMC, the conditioning of the vesting conditional use permit is necessary in order to enhance the built environment in the surrounding neighborhood and perform a function or provide a service that is essential or beneficial to the community, city, or region; ensure compatibility with adjacent properties, the surrounding neighborhood, and the public health, welfare, and safety; and ensure that the project substantially conforms with the purpose, intent and provisions of the General Plan, the applicable community plan, and any applicable specific plan.

The campuses have been used for educational uses for a significant period of time. The East Campus was originally the location of the Brentwood Military Academy which opened in 1930 and operated until 1972, when the School opened. The West Campus was previously Marymount Junior School until the School purchased it in 1995. The historic use of the School on both campuses has not been detrimental to the character of development in the immediate neighborhood. The School's compliance with its current CUPs, demonstrates its compatibility with its residential neighbors. Notwithstanding the foregoing, conditioning the vesting conditional use is necessary to ensure the appropriate continued operation of the School and the integration of the Project's proposed improvements.

As described in the findings above, the proposed conditions will ensure compatibility with the surrounding community. The proposed CUP will continue to define clear limitations on school operations. All student drop-off and pick-up will continue to occur on the campuses via Barrington Place on the East Campus and Bundy Drive on the West Campus. Furthermore, the Project's design will improve traffic and parking conditions around the campuses by increasing parking capacity on-site and internal queuing capacity and although an enrollment increase is included for the East Campus, the School is committed to zero net new trips during the peak hours.

As further described in the findings above, the proposed architectural design of the buildings will be built in a manner that respects and preserves the neighborhood's residential character and minimizes views of the School facilities from surrounding properties. The Brentwood School Education Master Plan includes fences, walls, and significant new landscape buffers to provide privacy and reduce noise to nearby properties. The new buildings will be similar in character and massing to the existing buildings and will maintain a scale and setbacks that are consistent with the character of the residential surroundings. New buildings will be screened from view from most adjacent properties and streets by existing and proposed landscaping, existing buildings, and topography. The floor area ratios will be 1.2 to 1 and 0.5 to 1 on the East Campus and the West Campus, respectively, below the permitted 3 to1 floor area ratio.

The proposed conditions of approval will protect the best interest of the surrounding properties and neighborhood and lessen or prevent any detrimental effect on the area, and reduce the potential adverse environmental impacts of the conditions use while also allowing the School to modernize its facilities, thereby securing appropriate development consistent with the objectives of the General Plan and the City's established policy of approving conditional uses for a schools within residential areas.

- C. Site Plan Review Findings in accordance with Sec. 16.05 of the LAMC (East Campus only, as new development on the West Campus will be below the Site Plan Review thresholds):
  - 1. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

Pursuant to LAMC Section 12.36-D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the finding found earlier in this document as Finding No. 3 in the Conditional Use Permit Findings in accordance with Section 12.24 T of the LAMC and is hereby incorporated by reference.

2. The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements, that is or will be compatible with existing and future development on adjacent properties and neighboring properties.

The Project will enhance the existing School function and appearance of the East Campus. The Campus will be enhanced within the existing boundaries to include new buildings of similar character and scale as the existing buildings and a network of on-site circulation designed to promote pedestrian activity and safety. Building roofs will generally be flat, with some parapets. The buildings and the open space areas are designed to complement the core of the Campus while maintaining depth of setbacks adjacent to residential uses, articulation, and landscape that respects the residential scale and character of the surrounding area. Massing of the buildings will take advantage of the arroyo setting and the arrangement of the existing core buildings of the East Campus. Taller buildings will be located on the bottom of the former arroyo with terraced building pads built into the slopes with lower profile buildings closest to the single-family homes along Layton Drive. The new buildings will also be proportioned to modulate height and maintain the residential street scale and character when viewed from the surrounding public areas.

In addition, at full buildout the surface parking lots on the School property will be replaced with garages situated below and adjacent to the Middle School Classroom Building and Upper School Arts Building. This will enhance the residential character by eliminating the visual effects of surface parking lots.

The Project will develop approximately 244,300 square feet of net new building area on the East Campus. At full buildout the East Campus will have an FAR of approximately 1.2 to 1, which is well below the total maximum permitted floor area of 3 to 1, as set forth in LAMC Section 12.21-1 A.1. The Project's design will ensure that the East Campus will remain compatible with existing or future development on adjacent and neighboring properties.

The Applicant is seeking project-specific height requirements that are less restrictive than those otherwise required for both campuses pursuant to LAMC Section 12.24 F; however, the buildings would visually appear to be in scale and character of the surrounding single-family, multi-family, institutional, and commercial uses from most vantage points. As noted above, massing of the buildings will take advantage of the arroyo setting and the arrangement of the existing core buildings of the East Campus. Taller buildings will be located on the bottom of the former arroyo with terraced building pads built into the slopes with lower profile buildings closest to the single-family homes along Layton Drive and Woodburn Drive. The requested modification to the yard setbacks will not occur adjacent to any single-family homes.

In connection with the development of new buildings, the Project will provide additional security and building lighting within the East Campus to provide clear identification of pedestrian pathways, gathering spaces, and parking facilities. This lighting will also provide for the safety and security of students, faculty, staff, and visitors. Like the existing outdoor lighting, such new lighting will be low-level and hooded or shielded and directed away from all nearby offsite lightsensitive uses.

Consistent with the design guidelines outlined in the Community Plan, the Project will enclose all trash receptacles from view on the Campus. Service and delivery vehicles will continue to access the East Campus from Barrington Place. The School will continue to require that all companies that deliver to the East Campus do so outside of the hours of student drop-off and pick-up.

The Project includes an upgrade to its educational, athletic, and arts facilities, as well as moving parking and vehicular circulation underground on the East Campus to improve the experience for its users and carefully buffer impacts with its neighbors. The School buildings have been properly sited with placement of the vehicular access, drop-off areas, and parking in such a manner that it obscures noise and views of the Campus from nearby residences with appropriate siting and architectural design of the buildings to maintain an appropriate scale with the neighborhood and focus activity away from the periphery of the Campus.

The Project will use on-site landscaping to contribute to the environment, increase pedestrian comfort, add visual relief to the street views, and provide natural barriers around the perimeter of the East Campus. New landscaping and landscaped courtyards, plazas, seating areas, and walkways will be located throughout the Campus; these features will contribute to the sense of openness and facilitate personal safety. Existing and proposed landscaping will be used as appropriate to provide buffering and to screen new buildings from view of off-site single family homes not owned by the School. Specifically, new trees will be planted along a portion of the School's northern boundary in advance of construction of the Northeast Classroom Building to screen that building from view from the abutting and adjacent single family residences. In addition, the School will continue to maintain a closed Campus requiring all visitors, guests, and vendors to have appointments prior to being granted access.

Therefore, the Project consists of an arrangement of building and structures (including height, bulk, and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.

# 3. Any residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties

The Brentwood School Education Master Plan is a proposal for improvements and increased enrollment for a private school; therefore, it is not a residential project and does not contain any residential uses.

# D. Zoning Administrator Adjustment Findings in accordance with Sec. 12.28 of the LAMC (Applicable only to the East Campus):

# 1. While site characteristics or existing improvements make strict adherence to the zoning regulations impractical or infeasible, the project nonetheless conforms with the intent of those regulations.

The School is proposing new fences, gates, and walls that are consistent with the existing campuses and that are essential for student safety and security. The School is requesting a Zoning Administrator's Adjustment pursuant to LAMC Section 12.28 to permit permanent sports netting up to 20 feet in height, and up to 50 feet in height during football season, on the East Campus along Sunset Boulevard in lieu of the more restrictive fence heights otherwise permitted by LAMC 12.21-C.1.g. The Middle School Athletic Field will be constructed atop the new parking garage, and the sports netting is necessary to prevent any errant balls from traveling into the adjacent sidewalk or street.

The Project Site characteristics and existing improvements make strict adherence to the fence and wall regulations impractical because the athletic field is adjacent to Sunset Boulevard, a heavily-travelled Avenue I. The Project Site is characterized by sloping terrain along the Barrington Place and Layton Drive sides of the Campus. The only large flat area on the Schoolowned property that is suitable for an athletic field is adjacent to Sunset Boulevard. The sports netting will consist of light material that will not block vision. The granting of the Zoning Administrator's Adjustment will conform to the intent of the Zoning Code and will be consistent with the existing Campus and many residences and schools throughout the City. The proposed sports netting is consistent with LAMC Section 12.22-C.20.f.9 which provides that "[a]n open mesh type fence to enclose an elementary or high school may be located and maintained in any required yard." This provision of the LAMC reflects the City's interest in ensuring schools have adequate fencing to protect adjacent uses and provide security for the schools. The sports netting will not block views and will ensure the safety of both students on Campus and of motorists driving on Sunset Boulevard who might otherwise get distracted by errant balls travelling into the roadway.

Therefore, while the Project Site characteristics and existing improvements make strict adherence to the fence and wall regulations impractical, the Project nevertheless conforms with the intent of the regulations.

2. In light of the project as a whole, including any mitigation measures imposed, the project's location, size, height, operations and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

Schools are permitted to, and frequently do, use residentially-zoned properties for school purposes. Many private schools throughout the City are located in single-family residential neighborhoods. Recognizing that schools are in residential neighborhoods, close to children, the LAMC allows private schools to use residential properties for school purposes through a CUP. Accordingly, private school uses are permitted on the East Campus by a CUP in the RE11 zone pursuant to LAMC Sections 12.24-T.3(b) and 12.24-U.24(b). Approval of a CUP for the Education Master Plan will not adversely affect the neighborhoods or public health, safety, and welfare, as it will facilitate the continued use of the campuses as an independent school.

In connection with approval of the existing CUPs for the campuses, the City has already determined that the Project's location, size, height, operation, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

The proposed sports netting is consistent with LAMC Section 12.22-C.20.f.9 which provides that "[a]n open mesh type fence to enclose an elementary or high school may be located and maintained in any required yard." This provision of the LAMC reflects the City's interest in ensuring schools have adequate fencing.

As stated above, the sports netting will consist of light material that will be see-through. The sports netting will not have any impacts on visual character and will not block any views. Furthermore, the sports netting will be beneficial because it will ensure the safety of students on Campus and of motorists driving on Sunset Boulevard who might otherwise get distracted by errant balls travelling into the roadway. Therefore, the Project's location, size, height, operations, and other significant features will be compatible with and will not adversely affect or further degrade adjacent properties, the surrounding neighborhood, or the public health, welfare, and safety.

# 3. The project is in substantial conformance with the purpose, intent and provisions of the General Plan, the applicable community plan and any applicable specific plan.

Pursuant to LAMC Section 12.36-D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the finding found earlier in this document as Finding No. 3 in the Conditional Use Permit Findings in accordance with Section 12.24-T of the LAMC and is hereby incorporated by reference.

# E. Zoning Administrator Determination Findings in accordance with Sec. 12.24-X.28 of the Municipal Code – Grading (Applicable only to the West Campus)

 Grading in excess of the absolute maximum Grading quantities listed in Subparagraph (1) of Paragraph (f) of Subdivision 10 of Subsection C of Section 12.21 of this Code is done in accordance with the Department of City Planning – Planning Guidelines Landform Grading Manual (adopted by the City Council on June 1983), and is used to reflect original landform and result in minimum disturbance to natural terrain. Notching into hillsides is encouraged so that projects are built in natural terrain as much as possible.

The West Campus is located in a designated Hillside Area. In 2011, the City Council adopted the Baseline Hillside Ordinance (Ordinance No. 181,624) ("BHO"), which is codified in LAMC Section 12.21-C.10. The BHO was adopted to regulate the scale and massing of single-family homes in single-family zones in Hillside Areas. The BHO regulates grading and although the BHO was intended primarily to address out-of-scale single-family homes, the Planning Department has determined that the requirements of the BHO that are not expressly limited to single-family homes or residential uses apply to private schools and other non-residential uses in the Hillside Area. Therefore, the West Campus is subject to the grading and export regulations of the BHO.

The Project improvements on the West Campus would require grading and export for all three additional buildings; however grading quantities for the subterranean structure under the Saltair Annex are exempt from inclusion in the grading quantities permitted by the BHO. The subterranean structure under the New Main Classroom Building and the basement under the new Administration Building will require approximately 5,000 cubic yards of grading. Grading for this subterranean parking structure would typically be exempt from the grading limitations of the BHO; however, due to the topography of the site and in order to provide access, the garage is not entirely subterranean. Also, a portion of the basement of the new Administration Building extends outside the building footprint. Therefore, this grading is not considered to be exempt and the grading associated with these two buildings will be in excess of the maximum "by right" grading quantities permitted under the BHO.

The BHO limits grading quantities to five percent of the site area plus 500 cubic yards, not to exceed the maximum "by right" grading quantity set forth for the zone. The BHO permits a maximum of 1,400 cubic yards for the RE11 zone. As noted, construction of the New Main Classroom Building requires approximately 5,000 cubic yards of grading. Under the authority of Section 12.24-X.28, the Zoning Administrator may issue a determination to allow grading to exceed the limitations in the BHO to allow grading quantities up to five percent of the site area plus 500 cubic yards. For the West Campus, this calculation would allow up to approximately 7,900 cubic yards of grading.

The West Campus is relatively flat with modest sloping at the southwest corner of the property near the intersection of Sunset Boulevard and Bundy Drive and is already improved with several buildings. The area where the subterranean garage will be located is currently improved with the Main Classroom Building, which will be replaced with the New Main Classroom Building and New Admissions Building. As such, there will be minimal disturbance of the natural terrain and the original landform. In addition, the Landform Grading Manual includes Specific Techniques for varying slope ratios, drainage devices, streets and sidewalks, and Hillside maintenance plans. The Project will comply with the guidelines contained in the Landform Grading Manual as appropriate.

2. That the increase in the maximum quantity of earth import or export will not lead to the significant alteration of the existing natural terrain, that the hauling of earth is being done in a manner that does not significantly affect the existing conditions of the Street improvements and traffic of the Streets along the haul route, and that potentially significant impacts to the public health, safety, and welfare of the surrounding community are being mitigated to the fullest extent feasible.

As noted above, the BHO was intended primarily to address out-of-scale single-family homes. As the grading limitations were geared toward single-family development, they are not appropriate for a multi-acre existing school site with multiple proposed buildings, such as the West Campus. These proposed buildings will replace the existing buildings in generally the same locations; therefore, the increase in the maximum quantity of earth import or export will not lead to significant alteration of the existing natural terrain.

Grading and hauling for the New Main Classroom Building and the New Administration Building is expected to last approximately 10 work days. As required by Project Design Feature TR-7 in the EIR, hauling will not take place during the A.M. or P.M. peak hours. In addition, Mitigation Measure TR-2 includes the following limitations:

- Coordinate haul trucks, deliveries, and pick-ups to reduce the potential for trucks waiting to load or unload for protracted periods of time.
- Minimize obstruction of through-traffic lanes on Barrington Place during construction at the East Campus, and on Bundy Drive during construction at the West Campus.
- Control construction equipment traffic from the contractors by flagmen in order to minimize circulation conflicts and obstruction of through-traffic lanes specifically along Barrington Place during construction at the East Campus and Bundy Drive during construction at the West Campus.
- Designate transportation routes for heavy trucks and haul trucks to be used over the duration of the Project construction.
- Schedule vehicle movements to ensure that there are no vehicles waiting off site and impeding public traffic flow on the surrounding streets.

Excavated material from West Campus development would be hauled by trucks off the Project Site to fill sites or to a landfill for use as daily cover. There are two alternative haul routes proposed. Under the first, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed east on Sunset Boulevard to I-405 and then proceed north or south, depending on where the soil will be deposited. Under the second, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed west on Sunset Boulevard and proceed south on Kenter Avenue to Bundy Drive to San Vicente Boulevard to Wilshire Boulevard to the I-405 and then proceed north or south, depending on where the soil will be deposited. This second haul route would be used as needed to avoid potential conflicts with the Archer School for Girls expansion project or other construction-related activity on Sunset Boulevard.

Construction haul truck trips will occur along major roadways and outside of the peak hours. Therefore, the proposed hauling would not significantly affect the existing conditions of the street improvements and traffic of the streets along the haul route, and the potentially significant impacts to the public health, safety, and welfare of the surrounding community will be mitigated. Impacts from truck hauling activities will be less than significant.

3. That approval of any use in this Subsection is in conformity with the public necessity, convenience, general welfare and good zoning practice and that the action will be in substantial conformance with the various elements and objectives of the General Plan, and that approval is consistent with applicable findings regarding setbacks, additions to structures existing prior to August 1, 2010, height, lot coverage, grading, off-street parking, and street access.

Pursuant to LAMC Section 12.36-D, when acting on multiple applications for a project, when appropriate, findings may be made by reference to findings made for another application involving the same project. This finding is substantially identical to the findings found earlier in this document as Finding No. 3 and Finding No. 2 in the Conditional Use Permit Findings in accordance with Section 12.24-T of the LAMC, which are hereby incorporated by reference.

#### F. Conditional Use Permit Utilization Findings Sec. 12.25 of the LAMC:

In accordance with LAMC Section 12.25-A, the privileges of the Brentwood School's CUP shall be considered utilized upon the earlier of: (1) the School's implementation of the operational conditions for the CUP following recordation of the City covenant acknowledging and agreeing to comply with the terms of the CUP; (2) placement and maintenance of a sign as set forth in LAMC Section 12.25-A.3.a for private schools; or (3) issuance of a building permit or other permit from the Department of Building and Safety for development of new facilities authorized by the School's CUP.

Where a lot or lots have been approved for use as a governmental enterprise, religious use, hospital, educational institution, or private school, including elementary and high schools, no time limit to utilize the privileges shall apply provided that all of the following conditions are met:

- (1) The property involved is acquired or legal proceedings for its acquisition are commenced within one year of the effective date of the decision approving the conditional use.
- (2) A sign is immediately placed on the property indicating its ownership and the purpose to which it is to be developed, as soon as legally possible after the effective date of the decision approving the conditional use. This sign shall have a surface area of at least 20 square feet.
- (3) The sign is maintained on the property and in good condition until the conditional use privileges are utilized.

The School satisfies the requirement of LAMC Section 12.25-A.3.a(1) because the School's existing ownership of the Project Site fulfills the requirement that the property be acquired within one year of the effective date of the CUP decision. The School will satisfy the requirements of LAMC Sections 12.25-A.3.a(2) and 12.25-A.3.a(3) because after the effective dates of the decision approving the CUP, the School will place a sign on the Project Site indicating the School's ownership of the East and West Campuses and the purpose to which the Project Site is to be developed. The sign will have a surface area of at least 20 square feet. The School will maintain the sign in good condition until the School implements the operational conditions for the CUP or the issuance of a building permit or other permit from the Department of Building and Safety for development of new facilities authorized by the School's CUP.

# **CEQA FINDINGS OF FACT**

#### I. INTRODUCTION

The Environmental Impact Report ("EIR"), consisting of the Draft EIR and the Final EIR, is intended to serve as an informational document for public agency decision-makers and the general public regarding the proposed adoption and implementation of the Brentwood School Education Master Plan ("Education Master Plan" or "Project"). The Education Master Plan includes physical improvements on both the East Campus (100 S. Barrington Place) and West Campus (12001 W. Sunset Boulevard) and a phased increase in enrollment on the East Campus (the "Project").

#### II. ENVIRONMENTAL DOCUMENTATION BACKGROUND

The project was reviewed by the Los Angeles Department of City Planning, Environmental Analysis Section (serving as Lead Agency) in accordance with the requirements of CEQA. The City prepared an Initial Study in accordance with Section 15063(a) of the State CEQA Guidelines. Pursuant to the provisions of Section 15082 of the State CEQA Guidelines, the City then circulated a Notice of Preparation ("NOP") to State, regional and local agencies, and members of the public for a 30-day period commencing on June 13, 2014. The purpose of the NOP was to formally inform the public that the City was preparing a Draft EIR for the project, and to solicit input regarding the scope and content of the environmental information to be included in the Draft EIR.

Written comment letters responding to the NOP were submitted to the City by public agencies and interested organizations. Comment letters were received from various public agencies. Also, written comments were provided by interested organizations and/or individuals via mail, e-mail or submittal at the NOP scoping meeting. The NOP, Initial Study, and NOP comment letters are included in Appendix 1.0 of the Draft EIR.

The Draft EIR evaluated in detail the potential effects of the Project. It also analyzed the effects of a reasonable range of six alternatives to the Project, including a "No Project" alternative. The Draft EIR for the project (State Clearinghouse No. 2014061059), incorporated herein by reference in full, was prepared pursuant to CEQA and State, Agency, and City CEQA Guidelines (Pub. Resources Code § 21000, et seq.; 14 Cal. Code Regs. §15000, et seq.; City of Los Angeles Environmental Quality Act Guidelines). The Draft EIR was circulated for a 63-day public comment period beginning on December 3, 2015, and ending on February 3, 2016. Copies of the written comments received are provided in the Final EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as Lead Agency, reviewed all comments received during the review period for the Draft EIR and responded to each comment in Section 3.0 of the Final EIR.

The City published a Final EIR for the project on August 30, 2016, which is hereby incorporated by reference in full. The Final EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding objectives and components of the project. The Final EIR addresses the environmental effects associated with implementation of the project, identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts, and includes written responses to all comments received on the Draft EIR during the public review period. Responses were sent to all public agencies that made comments on the Draft EIR at least 10 days prior to certification of the Final EIR pursuant to CEQA Guidelines Section 15088(b). In addition, all individuals that commented on the Draft EIR also received a copy of the Final EIR. The Final EIR was also made available for review on the City Department of Planning. Notices regarding availability of the Final EIR were sent to those within a 500-foot radius of the project site, as well as individuals who commented on the Draft EIR, attended the NOP scoping meeting, or provided comments during the NOP comment period.

A duly noticed public hearing for the Project was held by the Hearing Officer on behalf of the City Planning Commission on October 6, 2016. A duly noticed public hearing for the project was held by the City Planning Commission on November 17, 2016.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the Department of City Planning, Major Projects Section, 6262 Van Nuys Boulevard, Room 351, Van Nuys, California 91401. This information is provided in compliance with CEQA Section 21081.6(a)(2).

#### III. FINDINGS REQUIRED TO BE MADE BY LEAD AGENCY UNDER CEQA

Section 21081 of the California Public Resources Code and Section 15091 of the State CEQA Guidelines (the "Guidelines") require a public agency, prior to approving a project, to identify significant impacts and make one or more of three possible findings for each of the significant impacts.

- A. The first possible finding is that "[c]hanges or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR." (Guidelines Section 15091 (a)(1)); and
- B. The second possible finding is that "[s]uch changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency." (Guidelines Section 15091(a)(2)); and
- C. The third possible finding is that "[s]pecific economic, legal, social, technological, or other considerations, including provision of employment opportunities for

highly trained workers, make infeasible, the mitigation measures or Project alternatives identified in the final EIR." (Guidelines, Section 15091(a)(3)).

The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the Final EIR for the project as fully set forth therein. Section 15091 of the CEQA Guidelines requires findings to address environmental impacts that an EIR identifies as "significant." For each of the significant impacts associated with the project, either before or after mitigation, the following sections are provided:

- <u>Description of Significant Effects</u> A specific description of the environmental effects identified in the EIR, including a judgment regarding the significance of the impact;
- <u>Project Design Features</u> Reference to the identified Project Design Features that are a part of the project (numbering of the features corresponds to the numbering in the Draft EIR);
- <u>Mitigation Measures</u> Reference to the identified mitigation measures or actions that are required as part of the project (numbering of the mitigation measures correspond to the Mitigation Monitoring Program, which is included as Section V of the Final EIR);
- 4. <u>Finding</u> One or more of the three specific findings in direct response to CEQA Section 21081 and CEQA Guidelines Section 15091;
- 5. <u>Rationale for Finding</u> A summary of the reasons for the finding(s);
- 6. <u>Reference</u> A notation on the specific section in the Draft EIR that includes the evidence and discussion of the identified impact.

#### IV. DESCRIPTION OF THE PROJECT

The Applicant, the Brentwood School ("School"), is proposing to adopt and implement its Education Master Plan. The Brentwood School is an existing independent K–12 coed day school with two Campuses located four blocks apart in the Brentwood community. The two existing Campuses are referred to as the East Campus and the West Campus, respectively. The Brentwood School is seeking a new Vesting Conditional Use Permit ("CUP") and associated approvals to implement an Education Master Plan that includes physical improvements on both the East and West Campuses and a phased increase in enrollment on the East Campus.

The Education Master Plan was initiated by the School in 2007 to chart a 30-year vision for the School and includes all of the School's long-term plans for enhanced facilities. These plans will be carried out in four phases between the years 2016 and 2040, with multiyear gaps between each phase. The Education Master Plan will move the sixth-grade students from the West Campus to a new Middle School Classroom Building on the East Campus. This new building is

intended to be used for sixth- through eighth-grade students of the Brentwood School. The Education Master Plan also provides for the increase in students at the East Campus, which will include relocating 44 sixth graders from the West Campus and adding 221 new students. This increase will be phased in over four years from 2017 to 2020.

The East Campus currently includes outdoor athletic facilities, including the football and baseball fields, tennis courts, most of the aquatic facility, and parking on West Los Angeles Veterans Administration (VA) property, which is contiguous to the east and southeast boundaries of the Brentwood School property. Because the VA property is owned and operated by the federal government, it is not subject to City zoning or other regulations, and the City has no purview over the portions of the East Campus on VA property. Recently the federal government adopted regulations allowing the Brentwood School to enter into an Enhanced Sharing Agreement ("ESA") allowing for continued use of the VA property. The School is currently in advanced negotiations with the VA and expects the parties to execute the ESA soon.

On the East Campus, the Education Master Plan provides for three new buildings, two replacement buildings, and two renovated/expanded buildings. Two buildings would be removed to accommodate new or replacement facilities. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. These improvements would result in the removal of 43,660 square feet of existing building space and the addition of 287,960 square feet of new building space, for a net increase of 244,300 square feet. At full build-out, the floor area ratio ("FAR") on the East Campus would be approximately 1.2 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning. In addition, the Education Master Plan would add 170 net new parking spaces on the East Campus (a total of 305) spaces. In addition, the School would continue to have access to parking on the VA property under the new ESA.

On the West Campus, which currently houses grades K through 6, the Education Master Plan would largely improve existing facilities, open green areas, and play spaces, and would create a separate area for kindergartners. It would include the construction of two new buildings and one replacement building over the course of the approximately 30-year Education Master Plan. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. Seven buildings would be removed to accommodate new or replacement facilities. In addition, the Education Master Plan would add 24 net new parking spaces (a total of 116 spaces). These improvements would result in the removal of a total 28,881 square feet of building space and the addition of 61,000 square feet of new building space, for a net increase of 32,119 square feet. At full build out, the FAR on the West Campus would be approximately 0.6 to 1, which is below the 3.0 to 1 FAR permitted under the current zoning.

V. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT OR LESS THAN SIGNIFICANT BY THE INITIAL STUDY

The City Planning Department prepared an Initial Study dated June 13, 2014. The Initial Study is located in Appendix A of the Draft EIR. The Initial Study found the following environmental impacts not to be significant or less than significant:

# A. Agricultural and Forest Resources

- 1. Farmland
- 2. Existing Zoning for Agricultural Use or Williamson Act Contract
- 3. Forest Land or Timberland Zoning
- 4. Loss or Conversion of Forest Land
- 5. Cumulative Impacts

# B. Biological Resources

- 1. Sensitive Biological Species
- 2. Riparian Habitat and Wetlands
- 3. Movement of any Resident or Migratory Species
- 4. Habitat Conservation Plans

# C. Cultural Resources

- 1. Archeological Resources
- 2. Paleontological Resources

## D. Geology and Soils

1. Soils Inadequately Supporting Septic Tanks

## E. Hazardous Materials and Hazardous Materials

- 1. Hazardous Materials
- 2. Airport Land Use Plans and Private Airstrips
- 3. Wildland Fires

## F. Hydrology and Water Quality

- 1. 100-Year Flood Hazard Areas, 100-year Flood and Flooding
- 2. Seiche, Tsunami or Mudflow

# G. Land Use and Planning

- 1. Divide an Established Community
- 2. Habitat or Natural Community Conservation Plans

## H. Mineral Resources

- 1. Loss of Availability of Known Mineral Resources
- 2. Loss of Mineral Resources Recovery Site
- 3. Cumulative Impacts

## I. Noise

- 1. Airport Land Use Plans
- 2. Private Airstrips

Page F-28

## J. Population and Housing

- 1. Displacement of Existing Housing
- 2. Displacement of Existing Residents

# K. Public Services

1. Schools

# L. Transportation/Circulation

- 1. Air Traffic Patterns
- VI. ENVIRONMENTAL IMPACTS FOUND NOT TO BE SIGNIFICANT PRIOR TO MITIGATION

The following impact areas were determined to be less than significant, and based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that the following environmental impact categories will not result in any significant impacts and that no mitigation measures are needed:

#### A. Aesthetics

1. Visual Character/Quality and Views

#### **Temporary Construction Impacts:**

Construction activities within the Campuses could potentially be visible from vantage points that currently have views of the Campuses. Construction activities typically result in a disturbance in both existing natural and developed features, but only on a temporary basis. Views during construction at both Campuses may include buildings at various stages of construction and a wide range of construction equipment and materials. While buildings are under construction, framing, scaffolding, and cranes may be visible from off-site during construction of the upper stories. Also from time to time during construction, mechanical equipment, material stockpiles, staging areas, and trash bins could temporarily degrade the visual quality of the Campuses at the ground level. Construction of the proposed new buildings will occur over time, as described in Section II, Project Description of the Draft EIR, and, as a result, not all areas of the Campuses will be under construction at the same time since the Project will be constructed in phases. The extent to which the construction of the Project's buildings would affect the field of view and result in changes in visual character would be temporary and would be comparable to, but would not exceed, those previously identified, once framing is complete. For these reasons, construction of the Project will not result in any significant visual character impacts.

In terms of views, construction activities would temporarily introduce a variety of new unfinished structures, equipment, and materials. This activity would not block views to a degree that would exceed view blockage of buildings once completed, which, as discussed previously, will not substantially block views of existing prominent visual resources. As such, construction impacts on views will be less than significant.

#### **Operational Impacts:**

East Campus Visual Character Impacts:

As described in Draft EIR Section IV.C, Existing Conditions, the site predominantly consists of graded and engineered surfaces that are lacking in natural visual qualities. The East Campus itself does not contain significant scenic features or visual resources. From some vantage points, the existing Middle School Athletic Field may contribute to a sense of visual open space within the immediate area surrounding the Campus. The Project will temporarily remove the Middle School Athletic Field while the Middle School Classroom Building Parking Garage is under construction. However, the field will be replaced atop the structure, which will allow the open character of the field area to remain.

The regulation-size football field would be approximately 76,626 square feet (198 feet wide and 387 feet in length) and require the construction of a retaining wall to hold back the slope along the northern boundary. The wall would be approximately 6½ feet high in the northwest corner of the field and approximately 18 feet high in the northeast corner. The wall would be largely blocked from view from Sunset by the fence that is covered

with ivy and by the trees along the Sunset Boulevard right-of-way, as the line of sight would continue on an upward trajectory angle over the fence. The highest point of the retaining wall would be near the interior of the Campus and over 300 feet away from the Sunset Boulevard right-of-way.

The field would continue to provide a sense of open space from public viewing locations along Sunset Boulevard and would not extend above the heights of the existing structures within the Campus. In addition, the visual appearance of the wall would be softened by the deep landscaping, including evergreen trees and shrub or vine landscape screening planted pursuant to PDF AES-4.

The design approach for the new buildings will be a flexible contemporary style that will be compatible and relate in form, massing, and scale with the existing structures and their prevalent Mediterranean inspired design. The scale, materials, and colors of the new construction will be selected to create a compatible blend of new and existing While the East Campus buildings represent an attractive feature buildings. architecturally, they are generally not visible from and are blocked from view from the surrounding areas, and do not qualify as visual resources. The new buildings will be placed in a manner that allows the predominant cluster of buildings to remain significantly removed from immediate view of most surrounding viewpoints (with the exception of the Middle School Classroom Building), or would be compatible e with the character and architectural style of the existing Campus. No natural vegetation or unaltered features exist, as the Campus has been previously altered to develop the existing facilities. The Project will maintain much of the existing landscaping that is located along the edges of the Campus and between buildings, and will continue to include turf grass athletic fields. Moreover, the Project will not result in the widening or other alteration of Sunset Boulevard, a scenic highway. In addition, all new development would conform to the Urban Design Policies set forth in Chapter V of the Community Plan.

Therefore, the new development on the East Campus will not have a substantial adverse effect on a scenic vista or substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

<u>Visual Character Impacts from the Residential Neighborhood to the North</u>: Public areas to the north are generally limited to the public streets, with Layton Drive being located closest to the Campus. The Project will develop new buildings and facilities that are located south of and below the elevation of existing homes along Layton Drive. For the areas near Layton Drive, the Project will add approximately 960 square feet to the Temple Hall Building, increasing its size from 4,700 square feet to 5,660 square feet. The Project will also remove the North Parking Lot and replace it with a 45-foot landscape buffer that will increase separation from the adjacent residential units to the north.

The Project will include construction of the Northeast Classroom Building near the Layton Drive side of the Campus. The building will be located at the same elevation as the South Quad building, with the first floor at an elevation that sits below the prevailing elevation of Layton Drive, presenting a height of two stories at the corner closest to Layton Drive. The building includes a courtyard on the south side of the building that will

focus outdoor circulation and congregation away and out of view from the residential single-family homes to the north. At its tallest point, the roofline of the Northeast Classroom Building would be at the same height as the existing SLT Building and would reach a height of approximately 508 feet above mean sea level ("amsl") (28 feet under the LAMC). Therefore, the Northeast Classroom Building will present a height typical of a two-story home at this location and will be shielded from view from Layton Drive by the existing South Quad building and landscaping.

The rooflines of the Upper School Gymnasium will be constructed at approximately the same elevation as the rooflines of the existing buildings of the core of the Campus along Layton Drive (North Quad, South Quad, and Temple Hall). Renovations to the South Quad building will not increase its scale, massing, or square footage as the changes will be primarily to the interior of this building. The architectural styling will be compatible with the existing structures, and the heights of the East Campus structures will not appear taller than a typical two-story home as viewed from the north. New structures and renovations will not encroach into the existing setbacks of the North Quad, South Quad, and Temple Hall from Layton Drive.

There will be minor changes to the visual character of the East Campus as viewed from the residential neighborhood to the north. Views of the East Campus from homes with rear yards along Layton Drive are largely blocked by existing buildings and landscaping. Therefore, views of the East Campus and visual connectivity with the Campus and these homes are limited to two clusters of homes located on the same side of Layton Drive as the East Campus. These homes are located on either side the Campus buildings, with rear yards facing toward the Campus. A group of five to six homes to the northwest that front either Sunset Boulevard or Layton Drive have only intermittent and limited views from their rear yards toward the south across the Campus over the Middle School Athletic Field and of the Middle School Classroom Building.

There are two single-family residential homes northeast of the East Campus buildings on the Campus-side of Layton Drive with rear yards adjacent to the East Campus that would have views of the new development. These residences could experience a change in the visual character of the East Campus with the Project. In particular, the Northeast Classroom Building would be closest to these homes and would be built at a height that would be visible from these homes.

Photo simulations demonstrating the changes in view from within the rear yards of residences north of the Campus are provided in Draft EIR Figures IV.A-15a and 15b, Photos S1 and S2—Simulations of Views from Residences North of East Campus. The Project will include a 45-foot landscaped buffer along the property boundary to the Northeast Classroom Building. The landscape screen trees planted pursuant to PDF AES-3 will provide visual depth and will break up the massing appearance, as well as screen the homes from view of the Northeast Classroom Building. In addition, window placement within the Northeast Classroom Building will direct views skyward as opposed to downward toward the homes.

For the foregoing reasons, the Project would not result in significant visual character impacts as viewed from vantage points from the residential area to the north.

<u>Visual Character Impacts from Brentwood Village to the South</u>: The Project would include development of the Middle School Classroom Building and Parking Garage, and improvement of the main Campus entrance along the Barrington Place side of the Middle School Athletic Field. The Middle School Classroom Building will be aligned with the south boundary of the Campus and will replace the existing eucalyptus trees and other landscaping in this location. The building will be four stories above the roof of the Parking Garage, as viewed from within the Campus; however, because Barrington Place is at a higher elevation than the arroyo floor, only three stories will be visible from Barrington Place. The building will be set back at varying distances along its frontage on Barrington Place, varying from a minimum of 30 feet at the midpoint of its frontage to a maximum of approximately 90 feet toward the adjacent commercial properties that face onto Barrington Place closest to Chayote Street and Brentwood Village.

At the corner of Barrington Place and Sunset Boulevard, the building will be set back from the property line near the Barrington Place right-of-way approximately 75 feet, and will be at the property line (with no setback) near the Sunset Boulevard right-of-way.

A driveway will provide vehicle access from Barrington Place to the Parking Garage below the Middle School Classroom Building and Athletics Field and the Parking Garage that will be below the Upper School Arts Building. The Middle School Athletic Field would be elevated approximately 16 feet above the existing arroyo floor. However, as a flat surface on top of the Middle School Classroom Building Parking Garage, the Athletics Field itself would not add any structural height. The Middle School Classroom Building along Barrington Place will be approximately 47.5 feet as measured from the existing grade on Sunset Boulevard to the highest point of the roof.

Along the Barrington Place frontage, the main driveway entrance will be relocated further east and will be accented with entry design features. The driveway will loop toward the west to the Middle School Classroom Building Parking Garage entrance near the southwest corner of the structure. Landscape features and open space setback areas will be provided along the driveway and Campus frontage to create a sense of depth and to reduce the perception of building mass and scale.

The Middle School Classroom Building will have its lobby and entrance facing the Barrington Place forecourt and Brentwood Village. A visual simulation of the Middle School Classroom Building frontage along Barrington Place is provided in Draft EIR Figure IV.A-16, Photo S3—Visual Simulation from Barrington Place. This simulation provides a conceptual depiction of how the new Middle School Classroom Building would appear in terms of height and massing from Barrington Place looking northwest. The Middle School Classroom Building will have a scale and massing similar to the office and apartment buildings located directly opposite the Campus on the south side of Barrington Place. For this reason, the Project would not result in significant visual character impacts as viewed from vantage points within Brentwood Village.

The top of the Upper School Arts Building would be approximately 48.5 feet above the elevation of Barrington Place. However, views of this building would be mostly obscured from view from motorists and pedestrians by the existing commercial buildings and street trees along Barrington Place.

For the foregoing reasons, the Project would not result in significant visual character impacts as viewed from vantage points from Brentwood Village to the south.

<u>Visual Character Impacts from the Veterans Administration Property to the East</u>: Existing views from the VA property and other nearby uses to the southeast, such as the Barrington Dog Park, include portions of some of the existing buildings on the Campus. The portion of the VA property containing the football and track field, ball fields, and golf course has an open space visual character and separates the Campus from the residential neighborhood of Brentwood Glen further to the east and northeast. The Project will generally not be visible from Brentwood Glen due to the lower elevation of the Campus in relation to this neighborhood, as well as intervening buildings and landscaping. The Project will increase the number of buildings within the East Campus visible from the VA property, the dog park, and other public spaces. New Project buildings closest to the VA property and other areas to the east will include the Upper School Gymnasium, the Northeast Classroom Building, and the Upper School Arts Building and Parking Garage. However, all VA property abutting the Project site consists of open space.

The Upper School Gymnasium will be the most prominent new building from vantage points to the east. However, this building will be located in front of other existing buildings, which are currently visible, including the SLT Building. Portions of the SLT Building will remain visible behind the new Upper School Gymnasium. The Upper School Arts Building will replace the existing Middle School Classroom and Gymnasium Buildings and will not add a significant change in building mass as viewed from the east.

The roof of the new Middle School Classroom Building to be constructed south of the Middle School Athletic Field may be visible at distance above the rooflines of the other buildings from some vantage points, but will not add an atypical element to the urban skyline in that direction of view. In addition, landscaping and architectural articulation will soften the massing and scale of the new buildings. Therefore, the Project would not result in significant visual character impacts as viewed from vantage points to the east of the East Campus.

<u>Visual Character Impacts from Sunset Boulevard to the West</u>: The Middle School Athletic Field and landscape slopes on the west side of the East Campus provide a substantial buffer between Sunset Boulevard and the Campus buildings. The Project will increase the number of buildings and building mass predominantly within the existing developed portions of the Campus. As such, the Upper School Gymnasium, the Northeast Classroom Building, and the Upper School Arts Building will be situated behind the existing structures and either not be visible from, or will not appear as atypical elements on the skyline in views from the west. Also, the Middle School Gymnasium Building will be constructed in the current location of Academic Village on the floor of the arroyo, so views will be limited and any increase in building mass will not be significant.

In addition, the existing ivy-covered fence and landscaping along the edge of the Campus will continue to block most views of the existing and proposed new Campus buildings from the sidewalk along the Campus frontage. Southbound vehicles would have temporary views of the upper portions of the buildings, as the vehicles are in

motion and landscaping obstructs portions of the direct line of sight to the buildings. A visual simulation provided in Draft EIR Figure IV.A 17, Photo S4—Visual Simulation from Sunset Boulevard, shows the change in visual character of the Campus as viewed from Sunset Boulevard. A conceptual depiction of height and massing of the Middle School Classroom Building and an indication as to the approximate heights of the Middle School Gymnasium Building and Upper School Arts Building located toward the central portion of the Campus are shown.

Protective sports netting would be installed along the perimeter of the School property along Sunset Boulevard at a permanent height of 20 feet, and up to a height of 50 feet during football season to prevent any errant balls from travelling into the sidewalk or street. However, this netting would consist of light materials that would blend into the Campus and surrounding uses. In addition, the permanent 20-foot-tall netting would not exceed the height of a typical single-family residence, and the football season netting would be temporary and not create a sense of building mass. Therefore, the athletic field netting would not degrade the existing visual character or visual resources in the area. Impacts would be less than significant.

The Project will add the Middle School Classroom Building and Parking Garage, and will raise the elevation of the Middle School Athletic Field so that it would be approximately 16 feet in height above the arroyo. While the Middle School Athletic field will be below the ivy-covered perimeter fence and landscape trees, it will continue to provide a significant buffer between Sunset Boulevard and the massing of the majority of Campus buildings further east. This will continue to provide a sense of visual openness from the immediate area along Sunset Boulevard, albeit somewhat reduced by the new Middle School Classroom Building. The new Middle School Classroom Building will be built into the Barrington Place slope of the Campus and will be three stories in height above Barrington Place.

This structure would add a new feature to the Campus that will be visible from various vantage points along Sunset Boulevard and will change the existing, relatively open character of the southwesterly portion of the Campus. Draft EIR Figure IV.A-18, Photo S5—Visual Simulation from Sunset Boulevard and Barrington Place, provides a conceptual depiction of how the Campus new Middle School Classroom Building would appear in terms of height and massing from just south of the intersection of Sunset Boulevard and Barrington Place. This simulation represents a typical view from a northbound vehicle approaching the intersection. The building's location at the base of the slope will minimize the building mass from Sunset Boulevard and the architectural styling, articulation, and landscape features will ensure the building creates an attractive visual feature.

As such, it will be consistent with the overall urban character of the area. Therefore, the Project would not result in significant visual character impacts as viewed from vantage points along Sunset Boulevard.

The regulation-size football field would require the construction of a retaining wall to hold back the slope along the north boundary. The wall would be largely blocked from view from Sunset by the ivy-covered fence, along with trees, along the Sunset Boulevard right-of-way, as the line of sight would continue on an upward trajectory angle over the fence. The highest point of the retaining wall would be near the interior of the Campus and over 300 feet away from the Sunset Boulevard right-of-way. The field would continue to provide a sense of open space from public viewing locations along Sunset Boulevard and would not extend above the heights of the existing structures within the Campus. In addition, the visual appearance of the wall would be softened by the deep landscaping, including evergreen trees and shrub or vine landscape screening, planted pursuant to PDF AES-4.

Sunset Boulevard was designated as a scenic highway because it offers natural scenic quality in undeveloped or sparsely developed areas or traverses urban areas of cultural, historical, or aesthetic value, which merit protection and enhancement. The Project is located within an urbanized area and would not result in the development of undeveloped or sparsely developed areas. Moreover, the portion of Sunset Boulevard near the Project site is not considered to be an urban area of cultural, historical, or aesthetic value. In addition, the Project will not result in an inappropriate widening of Sunset Boulevard that is inconsistent with the policies of the Community Plan. Therefore, the Project's impacts to Sunset Boulevard, as a Scenic Major Highway, would be less than significant.

#### East Campus View Impacts:

Project impacts to views from vantage points in the vicinity of the East Campus are considered in the following paragraphs. As the East Campus is not considered to be a valued visual resource, the following analysis focuses on views throughout the Project site.

<u>View Impacts from Residences to the North</u>: Views of the Project site from the residential area to the north of the East Campus are generally constrained or blocked by existing structures and mature trees and other landscaping.

Construction of the Middle School Classroom Building could result in a change in views from a limited number of homes in this area. However, these homes are currently not afforded significant views of valued visual resources in the general direction of the Campus since the area is urbanized in character. Moreover, impacts to private views are not considered to be significant under the L.A. CEQA Thresholds Guide. Therefore, the Project would not result in significant view impacts as viewed from vantage points in the residential area to the north.

<u>View Impacts from Brentwood Village to the South</u>: Existing views of or across the Campus from most vantage points in Brentwood Village are constrained or blocked by commercial buildings along Barrington Place immediately south of the Campus, street lighting and power poles, fences, and landscaping. This condition would not change with implementation of the Project.

The Project will include development of the Middle School Classroom Building atop a parking garage on the Barrington Place side of the Campus immediately south of the Middle School Athletic Field. The structure will be three stories above the street elevation and will span the length of the Athletic Field. This new building will change the middle distance views across the Middle School Athletic Field of landscaped Campus

slopes and perimeter trees, and the skyline of trees from more distant landscaped neighborhoods. However, these viewsheds do not contain any valued visual resources; therefore, impacts will be less than significant.

If the School elects to construct a regulation-size football field for the Middle School Athletic Field, a retaining wall would be constructed to hold back the slope along the north boundary. However, as this wall would be built into the base of the existing slope, it would not block views of any valued visual resources.

Existing views from most vantage points in Brentwood Village, predominantly along Barrington Place, and its adjoining sidewalks, the Santa Monica Mountains and the Getty Center, are generally obscured by the existing buildings, fences, and landscaping. Existing views from portions of the sidewalks and roadway of the Santa Monica Mountains and the Getty Center may be intermittently blocked by the new Middle School Classroom Building from moving cars and pedestrians traveling on a short stretch of Barrington Place near the School's main driveway, which would incrementally reduce the visibility of these visual resources. However, while this view may be blocked from a single vantage point, it would not be blocked from other nearby vantage points. Specifically, views of the Santa Monica Mountains and the Getty would remain visible from next to the Wells Fargo building on Chayote Street facing northwest. Additionally, views would remain visible from the intersection of Barrington Place and Chayote Avenue facing north, because from this vantage point the East Campus is not visible due to the curvature of the road and Campus topography. Finally, the Santa Monica Mountains and the Getty will remain visible from the intersection of Sunset Boulevard and Barrington Avenue facing northwest. The Campus is not visible from this location due to intervening buildings to the north. The significance of view blockage is based on whether the view blockage would occur along a substantial length of a public view area, as opposed to a single, fixed vantage point. Therefore, Project impacts associated with public views of the Santa Monica Mountains and the Getty Center from public streets and sidewalks in Brentwood Village would be less than significant.

The Middle School Classroom Building will also partially obstruct existing long-range views of the Santa Monica Mountains and the Getty Center from the north-facing windows of four apartment units located at 115 Barrington Place and north and northwesterly facing windows of the small office building located at 125 Barrington Place. Under CEQA, the determination of a significant impact depends on whether the impact would affect public viewsheds, not whether it would affect particular persons' views. As a result, impacts to private views are not generally considered to be significant under the L.A. CEQA Thresholds Guide. Therefore, impacts to this limited number of existing private views along Barrington Place would be less than significant.

<u>View Impacts from the Veterans Administration Property to the East</u>: View impacts to the existing midrange views from the VA property and other adjacent uses, such as the dog park, to the southeast include portions of some of the existing buildings on the Campus. Longer-range views from some vantage points to the west and southwest include portions of the Santa Monica Mountains. The Project will add new buildings along its eastern boundary, including the Upper School Gymnasium, the Northeast Classroom Building, and the Upper School Arts Building and Parking Garage. From the VA property, the full height of the Upper School Arts Building (six stories) and the Upper

School Gymnasium Building (five stories) will be visible. The Upper School Gymnasium will be the most prominent new building from vantage points to the east and will add more building mass closer to the eastern edge of the Campus. The Project will not add a highly discernible change in building mass from the distant views from the east. The panoramic views across the athletic fields located on the VA property from public areas directly adjacent to the East Campus (near the parking lot along Barrington Place) will be largely maintained since development will be limited to the existing developed portions of the Campus, mostly located on the bottom of the arroyo and substantially blocked from view by existing development. Based on proposed maximum heights, the rooflines of the new buildings will not be tall enough to intrude into the skyline and block distant views beyond the buildings, including existing views of the Santa Monica Mountains. Therefore, the Project's impacts to view vantage points located east and southeast of the Campus will be less than significant.

<u>View Impacts from Sunset Boulevard and the Residences to the West</u>: Views from cars and pedestrians travelling across Sunset Boulevard and across the East Campus are limited by the existing fence and landscaping along the perimeter of the Campus. There are no valued visual resources within this viewshed. Moreover, as most of the new Project buildings will be built at lower elevations relative to Sunset Boulevard, they will not obstruct existing distant views of the sky to the east. Protective sports netting would be installed along the perimeter of the School property along Sunset Boulevard up to a height of 50 feet to prevent any errant balls from travelling into the sidewalk or street. However, this netting would consist of light material that would not block any valued views.

West of Sunset Boulevard is a single-family residential neighborhood. This neighborhood is located at higher elevations as compared to the Campus, with the terrain increasing in elevation west of Sunset Boulevard. Given the higher elevations, some of the homes in this neighborhood may have skyline views over the Sunset Boulevard landscaping, with partial distant views of portions of some of the existing buildings on the Campus. However, the front, rear, and side yards are extensively vegetated with trees, and there are limited windows oriented toward views over the Campus to the east and southeast. The proposed development of new buildings within the core of the Campus will not significantly affect available views from this neighborhood, as views of new buildings will either replace views of existing buildings or be situated behind existing structures and landscape. Moreover, the Project will not obstruct existing distant views of the sky to the east from the majority of these homes. Therefore, view impacts to the residences to the west of Sunset Boulevard will be less than significant.

#### West Campus Visual Character Impacts:

As described in the Existing Conditions discussion of Draft EIR Section IV.C, Air Quality, the West Campus consists predominantly of graded and engineered surfaces that are lacking in natural visual qualities. The West Campus itself does not contain significant scenic features or visual resources. Views of the West Campus are largely blocked as a result of the differences in terrain and built environment. Nearby areas to the south and west are either situated at lower elevations and do not have views of the existing Campus, or such views are blocked by the existing fence and landscaping. Landscape

shrubs and trees with mature foliage line all four boundaries of the Campus, with exceptions where driveway access is provided.

While the West Campus buildings represent an attractive feature architecturally, they are generally not visible from the surrounding areas, and do not qualify as visual resources. The new buildings will be placed in a manner that allows them to remain significantly out of immediate view from most surrounding viewpoints, or would look very similar in character and architectural style of the existing Campus. No natural vegetation or features exist, as the Campus has been previously altered to develop the existing facilities. The Project will maintain much of the existing landscaping that is located along the edges of the Campus between buildings and the Central Lawn. Moreover, the Project will not result in the widening or other alteration of Sunset Boulevard, a scenic highway. In addition, all new development would conform to the Urban Design Policies set forth in Chapter V of the Community Plan. Therefore, the new development on the West Campus as part of the Project will not have a substantially adverse effect on a scenic vista or substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway.

<u>Visual Character Impacts from the Residential Neighborhood to the North along Saltair</u> <u>Drive and towards St. Martin of Tours to the East</u>: Single-family residential neighborhoods accessed from local roadways and collector streets are located north of the Campus. St. Martin of Tours is located to the east across Saltair Avenue from the Campus. From Saltair Avenue, the eastern portion of the Campus is visible when looking southwest from the residences and west from St. Martin of Tours. The two-story Saltair Annex will replace the existing surface parking lot in the northeast corner of the West Campus, an area that is visible from Draft EIR Figures IV.A 19a through 19c.

The Saltair Annex will be set back from Saltair Avenue by a minimum of approximately 23 feet, and approximately 29 feet from the adjacent residential property to the north. The roofline of the building will peak at approximately 35 feet above Saltair Avenue. A subsurface parking garage will be constructed under this new building. An on-site circular driveway will be added adjacent to Saltair Place to allow for drop-offs and pickups from the on-site daycare facility. The building would be set back approximately 50 feet from the nearest residence to the north of the Campus on Saltair Avenue. The Saltair Annex will be mostly shielded by the existing relatively tall trees that line the north boundary of the Campus. A diagram showing the approximate limits of the Saltair Annex relative to the existing landscaping is provided in Draft EIR Figure IV.A-20, Photo S6—Visual Simulation from Saltair Avenue.

The Saltair Annex roofline will be slightly lower in height than the sanctuary of St. Martin of Tours directly across the street and will be set back approximately 29 feet from the north property line and 23 feet from east property line. Because the Saltair Annex will be similar in scale to the church, it would not introduce a visually inconsistent element that will be incompatible with development to the north and east. Further, its visual mass and scale will be minimized by architectural articulation and additional trees. A conceptual visual simulation of the height and massing of the Saltair Annex from the intersection of Sunset Boulevard and Saltair Avenue is provided in Draft EIR Figure IV.A-21, Photo S7—Visual Simulation from Sunset Boulevard. Changes to the aesthetic quality of the West Campus will be minimal and consistent with the existing visual character of the

area. Therefore, the Project would not result in significant visual character impacts as viewed from vantage points within the single-family residential neighborhoods to north of the West Campus, or from St. Martin of Tours.

Visual Character Impacts from Sunset Boulevard, University Synagogue, and the Residential Neighborhoods to the South: Sunset Boulevard, a winding road running generally in an east-west alignment, defines the southern boundary of the Campus. Sunset Boulevard is a divided four-lane major arterial approximately 50 feet in width (from curb to curb) with a wide landscaped setback along the Campus. As the prevailing grade of Sunset Boulevard declines relatively rapidly toward the southwest, the retaining wall along the Campus frontage increases in height toward the southwest as the grade differential between the roadway and the Campus becomes greater. The lower elevation of Sunset Boulevard, landscaped slope buffer area, and retaining wall separate the Campus from Sunset Boulevard. Views of the Campus are limited to upper portions of buildings due to visual obstructions from landscaping and road curvature directing views away from the Campus.

Sunset Boulevard is designated a Scenic Major Highway because it offers natural scenic quality in undeveloped or sparsely developed areas or traverses urban areas of cultural, historical, or aesthetic value, which merit protection and enhancement. The Project is located within an urbanized area and would not result in the development of undeveloped or sparsely developed areas. Moreover, the portion of Sunset Boulevard near the West Campus is not considered to be an urban area of cultural, historical, or aesthetic value, nor would the Project result in the widening of Sunset Boulevard, which would be inconsistent with the policies of the Community Plan. Therefore, the impacts of the new West Campus development to Sunset Boulevard's status as a Scenic Major Highway would be less than significant.

South of Sunset Boulevard is University Synagogue and preschool, Brentwood Sunshine Preschool, and a single-family residential neighborhood. The residential homes face away from the West Campus and are at a lower elevation than the West Campus. Only partial views of the Campus buildings are available in the northeast direction from this neighborhood due to walls, landscaping, and intervening structures. There is little visual connectivity between the West Campus and the residential neighborhood south of Sunset Boulevard due to the width of the street, differences in elevation, and landscaping.

Therefore, while the Project will add buildings to the West Campus, these buildings will not be highly visible from the south, and the Project's visual character impacts as viewed from the south would not be significant.

<u>Visual Character Impacts from the Residences to the North and West along Bundy</u> <u>Drive</u>: The New Classroom Building and Parking Garage will be closest to the existing homes to the west and north of the Campus along Bundy Drive. It will be located in approximately the same location as the existing Main Classroom Building, with the New Classroom Parking Garage at approximately the same elevation as the ground floor of the existing building. This new structure will be built into the higher terrain on the west side of the Campus.

At the southwest corner of the Campus, the new Admissions Building will be visible from the corner of Bundy Drive and Sunset Boulevard. The Admissions Building will be the closest structure to Sunset Boulevard and will have a setback of approximately 30 feet from the street. The upper portion of this building will increase massing and will be visible from Sunset Boulevard, but the effect of massing and the scale of the building will be limited by the slope and landscaped buffer and by differences in elevations. A conceptual visual simulation of the height and massing of the New Classroom Building and Admission Building of the Campus as viewed from northbound Sunset Boulevard is provided in Draft EIR Figure IV.A-22, Photo S8-Visual Simulation from Sunset Boulevard and Bundy Drive. The landscaped slope will remain in place, as will the retaining wall and row of screen trees along the southern boundary of the Campus, which will continue to limit overall visibility of the Campus improvements. Facing northwest directly across Sunset Boulevard at the intersection with Bundy Drive, the frontage of the Admission Building would generally be obscured by the existing row of trees and the retaining wall, and by the topography sloping up from south to north at this point.

The height of the New Classroom Building and Admissions Building will be similar to the height of the existing Main Classroom Building and the Arts and Athletics Building. The New Classroom Building and Admissions Building will be set back from Bundy Drive approximately 55 feet on average, ranging from 50 feet to 60 feet. A diagram showing the approximate height of the New Classroom Building relative to the existing landscaping is provided in Draft EIR Figure IV.A-23, Photo S9—Visual Simulation from Bundy Drive. The dominant visual feature from vantage points to the north and west of the West Campus is the row of trees along the western boundary of the Campus, which will be maintained and preserved. Therefore, the construction of the New Classroom and Admissions Buildings will not introduce visual elements to the Campus or the surrounding urban environment that would be out of character with the existing visual character of the area, and visual character impacts would not be significant as viewed from vantage points to the north and west along Bundy Drive.

#### West Campus View Impacts:

Project impacts to views from vantage points in the vicinity of the West Campus are considered in the following paragraphs. As the West Campus is not considered to be a valued visual resource, the following analysis focuses on views of the Campus available from surrounding areas.

<u>View Impacts from the Residences to the North along Saltair Avenue and the St. Martin of Tours Catholic Church and Elementary School to the East</u>: The single-family homes to the north of the Campus are located on relatively large lots with large side and rear yard setbacks.

The single-family home directly to the north of the Campus is separated from the Campus with rear yard setbacks, as well as the setbacks of the Campus buildings of approximately 29 feet from the rear property line. A row of mature trees on Campus property also line this boundary, providing physical separation from the single-family homes. The topography increases slightly to the north of the Campus; however, the differences in gradient are not readily discernible on the ground, and views through the

Campus from the north are largely blocked by existing landscaping and structures. Moreover, these homes are currently not afforded significant views of visual resources in the general direction of the West Campus since the area is urbanized in character. In addition, impacts to private views are not considered to be significant under the L.A. CEQA Thresholds Guide. Therefore, the Project would not result in significant view impacts as viewed from vantage points in the residential area to the north along Saltair Avenue.

St. Martin of Tours is directly east of the West Campus and Saltair Avenue and occupies the corner of the Sunset Boulevard and Saltair Avenue. Scenic views are not available through the West Campus from St. Martin of Tours. As such, the new buildings on the West Campus will not block any available views of scenic natural features or scenic open spaces, or existing structures having scenic value. Therefore, the Project would not result in significant view impacts as viewed from St. Martin of Tours.

<u>View Impacts from Sunset Boulevard and the Residences and University Synagogue to</u> <u>the South</u>: The terrain gradually slopes downward to the south and southwest. As the elevation decreases to the south, the field of view of the Campus is limited for residents looking north and for University Synagogue looking northwest. The proposed West Campus improvements will be of a height and massing similar to the existing buildings on the Campus. Views of the Santa Monica Mountains are presently blocked by intervening topography, structures, and landscaping. Moreover, neither the homes, University Synagogue, nor Brentwood Sunshine Preschool are currently afforded significant views of visual resources in the general direction of the West Campus since the area is urbanized in character. Therefore, impacts to views from the south and southeast will be less than significant.

Views from cars and pedestrians travelling across Sunset Boulevard and across the West Campus are limited by the existing retaining wall, slope, and landscaping along the perimeter of the Campus. There are no valued visual resources within view. Therefore, the Project's view impacts from Sunset Boulevard would be less than significant.

<u>View Impacts from the Residences to the North and West along Bundy Drive</u>: A residential neighborhood consisting of one- and two-story single-family homes is located west of Bundy Drive with a row of homes along Bundy Drive facing the Campus. As the elevation decreases from east to west, the field of view across the Campus is limited. Distant views are generally not available due to the relatively flat terrain and existing buildings and landscaping. Scenic views are not currently available through the West Campus from these homes. Therefore, impacts to views from these residences will be less than significant.

### **Cumulative Impacts:**

As discussed in Draft EIR Section III, Environmental Setting and Related Projects, there are related development projects proposed for sites in the vicinity of the two Brentwood School Campuses. The Project, in combination with these related projects, would increase development in the Project area. The Archer Forward project is in closest proximity to the East and West Campuses. This development is located between the two Campuses on Sunset Boulevard, approximately 0.15 mile southwest of the East

Campus and 0.30 mile northeast of the West Campus. The majority of the related projects are located predominantly to the south of the Brentwood School's East and West Campuses at distances between approximately 0.62 and 2.0 miles.

The Archer Forward project includes improvements on an existing 7.3-acre campus to improve the educational facilities of the school. The Archer Forward project proposes the renovation and demolition of classroom and office space; the establishment of a Temporary Classroom Village and the development of new athletic, performing arts, and visual arts facilities. The existing outdoor athletic fields would be improved and would include a regulation-size soccer and softball field. These new improvements would be mostly screened from public view by existing structures.

The Brentwood School's East and West Campuses and the Archer School for Girls Campus are generally not collectively viewable from any one viewpoint. The campuses are separated by existing development and landscaping, and views of each are predominantly limited to viewpoints in close proximity to each. These projects, when considered cumulatively, would result in similar aesthetic impacts by adding new school buildings and related grounds and athletic facility improvements. Since the Brentwood School Project and the Archer Forward project will both occur within the boundaries of their existing campuses, and would include buildings and improvements matched in scale and visual character to the existing campuses, the cumulative change to the visual character of the area will not be significant. In addition, like the Project, the Archer Forward project will be subject to the Community Plan urban design standards, which will ensure a consistent character for the Brentwood Community and the Sunset Boulevard corridor. As such, cumulative visual character and view impacts from these two projects would be less than significant.

The other related projects listed in Draft EIR Section III, Environmental Setting and Related Projects, involve mainly mixed uses with commercial, retail, office, and highdensity housing within low- and mid-rise buildings in highly urbanized retail commercial areas to the south. The potential incremental effect on the visual character and views in this area would not be cumulatively considerable, as they do not occur within a shared view corridor, and views in the direction of the East and West Campuses near these other locations are completely blocked by existing urban uses.

Overall, the potential incremental impact of the Project would not significantly affect the character of the area or visual resources when considered in combination with the related projects. Therefore, impacts of the Project are not considered cumulatively considerable. Cumulative aesthetic and visual resource impacts are less than significant.

**Project Design Features:** The City finds that the Project Design Features AES-1 to AES-6, incorporated into the Project, reduce the potential visual impacts of the Project. The Project Design Features were taken into account in the analysis of potential impacts.

2. Light and Glare

A. Light

#### East Campus:

Most additions or reconfigurations of lighting within the interior of the East Campus would be too distant from the Campus perimeter to result in any light spillover off the site, or would be blocked by interior buildings and landscaping. Light from the windows of the Upper School Gymnasium, Upper School Arts Building, and existing buildings that would be renovated would not generate light spillover, given their location downslope of sensitive residential areas to the north and the dense perimeter landscaping that blocks much of the views of the buildings. The parking lots and rear of the commercial buildings within Brentwood Village to the south are not sensitive to lighting from within the Campus.

The Northeast Classroom Building and the Middle School Classroom Building and Parking Garage would be located near the north (Layton Drive side, or east side as commonly referred to in the community) and southwest (Barrington Place side, or west as commonly referred to in the community) perimeter of the East Campus, respectively, and lighting from these buildings could be visible from locations off site. As discussed in Draft EIR Section IV.A, Aesthetics and Visual Resources, the Northeast Classroom Building would include windows on its upper floors, which may be visible to residences located immediately north of the Campus. However, this building would be set back approximately 40 feet from the property boundary. In addition, as set forth in Project Design Feature PDF AES-3, the School would plant evergreen trees to block views of this building from adjacent residences. These trees would also block light that may be emitted from this building. Furthermore, the Northeast Classroom Building would not be used during evening hours, except for occasional special occasions such as open house.

The Middle School Classroom Building and Parking Garage, which would be located in the southwest corner of the Campus, would introduce new lighting on the East Campus that may be visible from the Sunset Boulevard transportation corridor, the single-family homes to the west of the Campus, and the apartment buildings in Brentwood Village located across Barrington Place. The parking structure would be fully enclosed, and no light would be visible from its exterior. The Middle School Classroom Building would be set back from the single-family homes and the frontage along Barrington Place with small areas available for landscaping that could help to shield lights. Moreover, this building would be constructed into the existing hillside, so that the lower portions would be blocked from view from the apartment buildings across Barrington Place. In addition, this building would generally not be in use during the evening hours. The lighting associated with this building would be low intensity and would be generally shielded. The lighting associated with this building would not be out of character with the area, and any potential impacts would be less than significant.

The East Campus development would also include the installation of outdoor night lighting to illuminate the football field and track located on the VA property. As noted in Section II, Project Description, of the Draft EIR, the VA property is owned and operated

by the federal government. Therefore, development on the VA property is not subject to City zoning or other regulations, and the City has no purview over the portions of the East Campus on VA property. The proposed lighting will require approval by the VA pursuant to a separate process. This Draft EIR includes information on the proposed field lighting for informational purposes only. As provided in a conceptual lighting plan for the East Campus football and track field, these lights would only be used during evening football games or other evening special events and would be turned off when the field is not in use. However, events are generally scheduled to conclude by 10:00 P.M., although on rare occasions (e.g., overtime games due to a tie score) some events could conclude after 10:00 P.M.

The football and track and field lighting would include a control and monitoring system for flexible control and management of lighting to allow athletic practices and events to occur into the post-dusk evening hours. The lights would be hooded and directed downward to the field such that they shall not create more than 0.5 foot-candles of spillover light at ground level at the property line of any adjacent off-site residential uses. This level of spillover lighting is well below the 2 foot-candle significance threshold. The conceptual lighting plan and resulting illumination in horizontal foot-candles are shown in Draft EIR Figure IV.B-1, Football and Track Field Lighting. There would be four light poles, each containing 12 light fixtures with 1,500-watt metal halide with covers to control sky glow.

The lighting would be shielded and inward facing around the perimeter of the field, which is substantially set back from adjacent uses. The locations of the light poles along the north side of the football and track field (south-facing light fixtures) would be set back approximately 400 feet from the nearest residential property on the Layton Drive side of the Campus and approximately 400 feet from the parking lot property boundary on the Barrington Place side of the Campus. The locations of light poles along the Barrington Place side of the field (i.e., north-facing light fixtures) are approximately 125–150 feet from the property boundary on the Barrington Place side of the Campus. The light poles would be 70 feet high, placed at approximately 49 feet below grade of Barrington Place and the nearest residential property to the north, which would place the light fixture at 21 feet above grade of Barrington Place and the property boundary on the Layton Drive side of the Campus. The net height of the poles would be 21 feet above the top of the adjacent slopes that align the boundaries of the arroyo. The relative positioning of the lights at lower elevations on the Campus, setbacks from off-site properties, and lighting features that direct the illuminants downward with shielding would reduce the potential for the light to be dispersed by atmospheric conditions causing skyglow. With the urbanized surrounding environment and limited nighttime dark skies, any residual skyglow effects of the field lighting would be less than significant.

In addition, the nearest off-site uses on the Barrington Place side of the Campus adjacent to the football field are a parking lot and a golf course, neither of which is sensitive to light spillover. As such, based on the position and extension of lighting, poles would not significantly intrude into the skyline or cause significant light spillover

onto adjacent land uses. Impacts from the football and track field would be less than significant.

The School may allow occasional commercial filming on the East Campus, subject to obtaining all necessary FilmL.A. permits and complying with all applicable FilmL.A. requirements. Such filming would be subject to the restrictions set forth in Project Design Feature PDF LT-2, which would reduce potential impacts from lighting used in connection with such occasional filming to less than significant.

# West Campus:

Lighting on the West Campus would not change significantly from the current conditions. The addition or reconfiguration of lighting would generally occur within the interior of the Campus and to the rear and side of on-site buildings around the Campus perimeter. These lights would be too distant from the Campus perimeter and would generally be blocked by Campus buildings and landscaping to result in light spillover over off the site. The most sensitive surrounding uses include the homes located directly north of the West Campus. Use of the Saltair Annex, a new two-story structure proposed to replace the current surface parking lot, could generate light from the windows of the upper story of the building that would be visible from homes to the north, as well as from St. Martin of Tours Church to the east across Saltair Avenue. However, existing trees along the northern boundary of the Project site would block light spillover when the building is used occasionally in the evening hours. St. Martin of Tours Church would not be significantly affected by light from classroom windows or by internal walkway and security lighting because of the distance across the street, intervening landscaping, the juxtaposition of the buildings, and the operational hours of both the School and St. Martin of Tours Church, which are generally limited to daytime hours and occur within lighted indoor areas. Similarly, outdoor lighting associated with the New Main Classroom Building would not generate light spillover due to its location upslope of the nearest home to the south and the existing landscape buffer along the southern and western edges of the Campus. The Admissions Building toward the front of the Campus would also include exterior security lighting. However, this building would be located upslope of the nearest homes to the south and west, and would be generally blocked by the differences in gradient and the landscaped perimeter buffer. In addition, no outdoor athletic events, such as after-school soccer or flag football, are held during evening hours on the West Buildings are not typically occupied during evening hours except for Campus. occasional special events, such as an open house or special performances in the Arts and Athletic Center.

Thus, nighttime lighting would generally consist of low-intensity, low-glare security lighting, hooded to direct light straight downward and prevent spillover. Therefore, impacts would be less than significant.

# B. Glare

#### East Campus:

<u>Nighttime Glare</u>: The Project will add or reconfigure interior and exterior lighting on the East Campus in connection with the new and renovated buildings, which has the potential to create nighttime glare visible to off-site uses. However, most of this new or reconfigured lighting within the interior of the East Campus would be too distant from the Campus perimeter, or blocked by buildings and landscaping, to result in glare impacts to off-site residences. The Middle School Classroom Building would be set back from the single-family homes and partly shielded by landscaping. Both the setback of the Middle School Classroom Building and the landscaping would minimize glare impacts. Moreover, Project Design Feature PDF LT-2 would ensure that nighttime glare impacts are less the than significant. Additionally, the parking garages would be no glare impacts from vehicle headlights of interior lighting within the structures. Vehicles currently use the internal roadways to access parking and will continue to do so under the Project.

The East Campus development would also include the installation of lighting to illuminate the football field and track located on the VA property. These lights would only be used during evening football games or other evening special events and would be turned off when the field is not in use. Project Design Feature PDF LT-1 would ensure that the lights used for the East Campus Upper School Athletic Field would be hooded and directed downward to the field such that the luminaires would not be directly visible from any off-site residential use. Travelers along Barrington Place would be able to see the lighting for a short duration while passing near the intersection of Chayote Street and Barrington Place. However, the road alignment along this stretch runs parallel to the football and track field, and drivers would not be looking directly toward the lights because the roadway is mainly surrounded by buildings and the intersection channels views toward a northeast direction away from the fields. The hooding design features and pole positions relative to the surroundings would reduce any potential glare impacts from the field lighting to less than significant.

<u>Daytime Glare</u>: New building windows would have the potential to create daytime glare. Daytime glare is affected by the sun's position relative to the Campus buildings at various times of the day. Given the latitude of the Project site, the sun is positioned slightly to the south and would have greatest potential to cause glare on south-facing building facades. Any reflection off the north side of the buildings would be minimal due to the position of the sun. While the Project's buildings would range from two to five stories in height, with the Upper School Arts Building the tallest structure at five stories, any glare from the buildings' windows would be mostly shielded from off-site properties by other buildings and landscaping. As set forth in Project Design Feature PDF AES-3, the School would plant evergreen trees to block views of the Northeast Classroom Building from adjacent residences. In addition, the taller buildings would be placed on the floor of or set into the slope of the arroyo, causing the majority of the façade to be blocked by the topography and surrounding buildings. Moreover, under Project Design Feature PDF LT-3, all glass used in building façades shall be anti-reflective or treated with an anti-reflective coating to minimize glare. As such, daytime glare impacts would be less than significant.

## West Campus:

<u>Nighttime Glare</u>: Lighting in the West Campus would not undergo significant changes with regard to lighting from the current condition. New lighting would generally occur within the interior of the Campus and to the rear and side of buildings around the perimeter. These lights would be too distant from the Campus perimeter and/or generally blocked by Campus buildings to be visible from most sensitive surrounding uses, including the homes located directly north of the West Campus. The West Campus would not hold any outdoor athletic events during the evening hours, and the buildings are not typically occupied during evening hours, except for occasional special events, such as an open house or special performances in the Arts and Athletic Center. Additionally, the new parking garages would be fully enclosed, and no lighting would be visible from the exterior, so there would be no glare impacts from vehicle headlights of interior lighting within the structures. Moreover, Project Design Features PDF LT-2 would ensure that nighttime glare impacts are less than significant.

<u>Daytime Glare</u>: New building windows that could reflect sunlight and cause off-site glare impact would be primarily located within the interior of the Campus and to the rear and side of buildings around the perimeter. They would be generally blocked from view of off-site residences and rights-of-way by other buildings and landscaping. Moreover, under Project Design Feature PDF LT-3, glass used in building façades shall be anti-reflective or treated with an anti-reflective coating in order to minimize glare. As such, daytime glare impacts would be less than significant.

**Cumulative Impacts**: Development of the Project, as well as the related projects in the area, would introduce new or expanded sources of artificial light in the portions of Brentwood in which the Campuses are located. However, the majority of related projects are located predominantly to the south of the Campuses at distances of between approximately 0.62 and 2 miles. As such, these related projects would not affect the same sensitive receptors or uses as the Project, and would not result in cumulative artificial light impacts. Moreover, like the Project, the related projects would be required to comply with the Los Angeles Municipal Code ("LAMC") regulations that reduce impacts from artificial light.

The Project and the related projects would introduce new sources of artificial light in the area. However, the area is urbanized with high levels of ambient lighting due to street lighting, vehicles, security lighting, and commercial area lights, along with a general nighttime glow because of the urbanized nature of the area. Therefore, the additional artificial light sources introduced by the Project and the related projects would not significantly alter the existing lighting environment or cause increased skyglow effects. Additionally, given the urbanized nature of the area with mid- and high-rise structures

and streetlights creating an already high level of ambient light, and the blocking effects of street trees and mature landscape trees on the Campuses, cumulative lighting of related projects would not be expected to interfere with the performance of off-site activities or intrude into sensitive areas, such as residences, hospitals, care facilities, etc. The Project does not introduce development and associated lighting to presently undeveloped land, so it would not materially increase ambient nighttime light levels or intensity of off-site shading. Additionally, the Project would incorporate design features and would not use reflective building materials in order to minimize any contribution to ambient or cumulative increases in daytime glare conditions. As a result, the Project, with related projects, would not result in cumulatively significant nighttime light and glare or shading impacts; therefore, the Project's contribution to cumulative artificial light impacts would be less than significant.

**Project Design Features:** The City finds that the Project Design Features LT-1 to LT-3, incorporated into the Project, reduce the potential light and glare impacts of the Project. The Project Design Features were taken into account in the analysis of potential impacts.

3. Shading Impacts

# East Campus:

<u>Winter Solstice</u>: Within the northern hemisphere, shadow impacts are typically greatest during the winter months due to the sun's low position in the sky. This results in longer shadows stretching roughly from the west to the east during daytime hours. As shown in Draft EIR Figure IV.B-2, East Campus Winter Solstice Shadows, shadows would extend in a northerly direction, moving across the surrounding landscape from the northwest to the northeast. While most of the shadows would be within the Campus boundaries, these shadows would also extend into the surrounding properties during some portions of the day.

As shown in Draft EIR Figure IV.B-2, shadows from the Middle School Classroom Building and Parking Garage, which would be implemented during Phase I of the Education Master Plan, would extend partially onto a single residential property along Sunset Boulevard during the 9:00 A.M. hour, but retreats by 12:00 P.M. as the sun moves higher in the sky. Shadows from the Northeast Classroom Building and Upper School Gymnasium, which would be implemented during Phase II and Phase III of the Education Master Plan, respectively, would not extend onto the adjacent residential properties north of the East Campus until between the hours of 12:00 P.M. and 3:00 P.M., as depicted in Draft EIR Figure IV.B-2. While the shadow diagrams show that the North Quad, Temple Hall, and South Quad Buildings cast shadows onto the residential properties north of the Campus at 9:00 A.M. and 3:00 P.M., these buildings currently exist, and shadows would not be exacerbated upon full implementation of the Project. Shadows from the Project's Middle School Gymnasium and Upper School Arts Building would remain within the Campus boundaries. The City considers a project to have a significant shading impact if shade-sensitive uses would be shaded by a proposed development for more than three hours between 9:00 A.M. and 3:00 P.M. during the winter. Because full implementation of the Project on the East Campus would not result in shadows casted on shade-sensitive uses for more than three hours during the winter, impacts during the winter months are considered less than significant.

Draft EIR Figure IV.B-3, East Campus Spring/Fall Equinox Spring/Fall Equinox: Shadows, illustrates shadows on the East Campus during the spring and fall equinoxes. Shadows would also move from west to east, but to a lesser extent than during the winter solstice. Shadows would generally be contained within the Campus boundaries until around the 5:00 P.M. hour. As shown in Draft EIR Figure IV.B-3, the existing North Quad Building partially shades residences to the northwest. Shadows from the new Middle School Classroom Building and Parking Garage, which would be implemented during Phase I of the Education Master Plan, would extend partially across Sunset Boulevard, but would not reach any single-family residences on the far side of the street. During the 1:00 P.M. hour, all shadows would be contained within the Campus Shadows from the Northeast Classroom Building, Upper School boundaries. Gymnasium, and Upper School Arts Building, which would be implemented during Phases II, III, and IV, respectively, would extend across the Campus and onto residential uses to the east at 5:00 P.M. However, because shadows would not be cast for more than 4 hours between 9:00 A.M. and 5:00 P.M., impacts during the spring and fall equinoxes would be less than significant.

<u>Summer Solstice</u>: Within the northern hemisphere, shadows tend to be the shortest of the year due to the higher position of the sun and would move from west to east, as shown in Draft EIR Figure IV.B-4, East Campus Summer Solstice Shadows. As a result of these short shadows, the majority of the shadows extended from the various East Campus Buildings during the summer months remain within the boundaries of the Campus. However, as shown in Draft EIR Figure IV.B-4, shadows from the Upper School Arts Building, which would be implemented during Phase IV, would extend onto the rear portions of the commercial buildings to the southwest between 9:00 A.M. and 12:00 P.M. The City considers a project to have a significant shading impact if shadesensitive uses would be shaded by a proposed development for more than four hours between 9:00 A.M. and 5:00 P.M. during the summer. As these uses are not considered shade-sensitive, impacts during the summer months would be less than significant.

### West Campus:

<u>Winter Solstice</u>: As shown in Draft EIR Figure IV.B-5, West Campus Winter Solstice Shadows, shadows move from west to east across the West Campus and surrounding landscape. During the morning hours of 9:00 A.M. and 12:00 P.M., the existing Main Classroom Building and Arts and Athletic Center would result in extended shadows onto the residential properties to the north and northwest of the Campus. The Saltair Annex, which would be implemented during Phase I of the Education Master Plan, would not extend shadows onto the property of the St. Martin of Tours until 3:00 P.M. Shadows

from the New Classroom Building and Admissions Building would not reach any residential properties or St. Martin of Tours Church or classrooms. Therefore, as the West Campus would not cast shadows onto shade-sensitive uses for three or more hours during the winter, impacts would be less than significant.

<u>Spring/Fall Equinox</u>: As shown in Draft EIR Figure IV.B-6, West Campus Spring/Fall Equinox Shadows, shadows also move from the west to the east during the spring and fall equinox. During the morning hours at 9:00 A.M., shadows from the existing Arts and Athletic Center Building and the New Classroom Building and Admissions Building would extend slightly past Campus boundaries, but would not extend across Bundy Drive to the residences to the west. Throughout the middle of the day, shadows would be completely contained within Campus boundaries. Finally, at 5:00 P.M., shadows from the New Classroom Building and Admission Building would extend across Sunset Boulevard to the east to the residential properties bordering Sunset Boulevard. However, because new buildings on the West Campus would not cast shadows onto shade-sensitive uses for four or more hours during the spring or fall, impacts would be less than significant.

<u>Summer Solstice</u>: Shadowing from buildings on the West Campus would be the shortest during the summer months and would move in the direction of west to east, as shown in Draft EIR Figure IV.B-7, West Campus Summer Solstice Shadows.

Between the hours of 9:00 A.M. and 1:00 P.M. shadows would remain within the boundaries of the Campus and would start to extend to the surrounding areas between the hours of 1:00 P.M. and 5:00 P.M. Shadows from the New Classroom Building and Admissions Building, which would be implemented during Phase III of the Education Master Plan, would not extend to the residential properties south of the West Campus or shadows from the Saltair Annex onto the St. Martin of Tours Church until around 5:00 P.M. The City considers a project to have a significant shading impact if shade-sensitive uses would be shaded by a proposed development for four or more hours between 9:00 A.M. and 5:00 P.M. during the summer. Therefore, as the new buildings on the West Campus would not cast shadows for more than four hours between 9:00 A.M. and 5:00 P.M. during the summer, impacts would be less than significant.

**Cumulative Impacts:** Cumulative shading impacts can occur when related projects are located sufficiently close to the Project site so as to create shadows that overlap with those of the Project and impact the same shade-sensitive uses. None of the related projects are located sufficiently near the Project site to have the potential to cast shadows that may affect some of the same shade-sensitive uses as the Project. Therefore, cumulative shading impacts would be less than significant

# B. Air Quality

1. Violation of Air Quality Standards or Substantial Contribution to Air Quality Violations

## **Construction**

Development of the Project would involve four phases between the years 2016 and 2040. Construction activities during each phase would include demolition, grading, building construction, asphalt paving, and architectural coating. Pursuant to Project Design Feature PDF AQ-1, none of the five construction activities would occur simultaneously, and no overlap of phases is anticipated. During periods of construction activity, on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, exporting of soils or demolished materials, and energy use would generate emissions. In addition, fugitive dust would be generated by grading and construction activities. However, construction impacts would be short term for each phase of the Project.

## Regional Analysis

## Phase I (2016-2020)

East Campus: Phase I consists of the construction of the 85,000-square-foot Middle School Classroom Building, the 110.000-square-foot Middle School Classroom Building Parking Garage, and a 960-square-foot building addition to Temple Hall. Site preparation will involve the removal of approximately 42,000 square feet of paved driveway area as the entrance would be reconfigured and surface parking would be replaced with the Middle School Classroom Building Parking Garage. The 65,000-square-foot Middle School Athletic Field will also be replaced. Grading will require the cut of approximately 19,650 cubic yards ("cy") of earthen material, which will generally be exported off site as excess soil. Should the School construct the regulation-size Middle School Athletic Field option, there would be additional grading into the slope along the north side of the field area, requiring a retaining wall and the excavation and removal of an additional 5,500 cy (total of 25,150 cy) of earthen material. Overall, the additional construction needed to make the Middle School Athletic Field regulation size would result in a negligible change in construction emissions, given that the California Emissions Estimator Model ("CalEEMod") modeling results (included in Draft EIR Appendix IV.C, Air Quality Modeling Data) in essentially the same total net emissions. Phase I is expected to begin construction in 2016 and be complete by 2018. A summary of the maximum daily regional construction emission for Phase I of the East Campus is provided in Draft EIR Table IV.C-5, East Campus Phase I Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-5, construction of the East Campus would result in emissions that do not exceed the significance thresholds. Therefore, construction at the East Campus during Phase I would result in a less than significant impact on regional air quality.

<u>West Campus</u>: Phase I would include the construction of the Saltair Annex and associated below-ground Saltair Annex Parking Garage and Saltair Drop-off, and the removal of obsolete facilities. The Saltair Annex would be approximately 28,500 square feet. The Saltair Annex Parking Garage and Saltair Drop-off would be approximately

14,500 square feet and would require the export of approximately 12,500 cy of excess soil. The approximately 1,800-square-foot existing playground area and 8,500 square feet of existing structures would be removed, for a total of 10,300 square feet of demolition. Phase I would be constructed between years 2018 and 2020. A summary of the maximum daily regional construction emission for Phase I of the West Campus is provided in Draft EIR Table IV.C-6, West Campus Phase I Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-6, construction of the West Campus would result in emissions that do not exceed the significance thresholds. Therefore, construction at the West Campus during Phase I would result in a less than significant impact on regional air quality.

# Phase II (2024–2027)

<u>East Campus</u>: Phase II includes a combination of new construction, demolition, and excavation for site preparation. New construction would consist of the 12,000-square-foot Northeast Classroom Building and the 35,000-square-foot Middle School Gymnasium Building. The Northeast Classroom Building would be constructed first. The existing 2,560-square-foot Academic Village Building, which is a modular structure on a foundation, would be removed. Site preparation would include the removal of approximately 3,330 cy of excess soil, which includes approximately 210 cubic yards from the Northeast Classroom Building area and 3,120 cy from the Middle School Gymnasium area. Emissions for the years 2024 to 2027 were modeled and a summary of the maximum daily regional construction emission for Phase II of the East Campus is provided in Draft EIR Table IV.C-7, East Campus Phase II Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-7, construction of the East Campus during Phase II would result in emissions that do not exceed the significance thresholds. Therefore, construction at the East Campus during Phase II would result in a less than significant impact on regional air quality.

<u>West Campus</u>: No new improvements are planned for the West Campus during Phase II.

# Phase III (2030-2034)

<u>East Campus</u>: Phase III construction would include the construction of the 75,000square-foot Upper School Gymnasium Building, which is expected to begin in 2030 and be completed by 2032. Grading would include the cut of approximately 11,400 cy of excess soil, all of which would be exported. A summary of the maximum daily regional construction emission for Phase III of the East Campus is provided in Draft EIR Table IV.C-8, East Campus Phase III Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-8, construction of the East Campus during this phase would result in emissions that do not exceed the significance thresholds. Therefore, construction at the East Campus during Phase III would result in a less than significant impact on regional air quality.

West Campus: Phase III would include construction of a new 8,000-square-foot Admissions Building and the removal of obsolete facilities. Site preparation would include the excavation of approximately 3,800 cy of excess soil that would be exported. In addition, Phase III would include the construction of the New Classroom Building and improvements to Campus grounds and parking. The existing 20,466-square-foot Main Classroom Building would be demolished and removed. The New Classroom Building would be 24,500 square feet, and an approximately 14,500-square-foot New Classroom Building Parking Garage would be constructed below the building. This construction would include the excavation of approximately 4,950 cy of excess soil, which would be exported. It is anticipated that construction would occur between years 2032 and 2034. A summary of the maximum daily regional construction emission for Phase III of the West Campus is provided in Draft EIR Table IV.C-9, West Campus Phase III Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-9, construction of the West Campus would result in emissions that do not exceed the significance thresholds. Therefore, construction at the West Campus during Phase III would result in a less than significant impact on regional air quality.

# Phase IV (2038-2040)

<u>East Campus</u>: Phase IV construction would include the construction of the 60,000square-foot Upper School Arts Building and a 20,000-square-foot addition to the Science/Library/Theater Building. In addition, during this phase, the 41,100-square-foot Upper and Middle School Gymnasium/Classroom Buildings would be demolished. Grading for the Upper School Arts Building would include the cut of approximately 8,900 cy of soil, all of which would be exported. A summary of the maximum daily regional construction emission for Phase IV of the East Campus is provided in Draft EIR Table IV.C-10, East Campus Phase IV Estimated Maximum Daily Regional Construction Emissions. Based on the results in Draft EIR Table IV.C-10, construction of the East Campus during this phase would result in emissions that do not exceed the significance thresholds. Therefore, construction at the East Campus during Phase IV would result in a less than significant impact on regional air quality.

<u>West Campus</u>: No new improvements are planned for the West Campus during Phase IV.

# Localized Significance Thresholds Analysis

# Phase I (2016-2020)

<u>East Campus</u>: The results of the Local Significance Threshold ("LST") analysis for Phase I of the East Campus (Middle School construction) are provided in Draft EIR Table IV.C-11, East Campus Phase I Construction LST Threshold and Maximum Project

Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day during the grading phase, for purposes of applying the South Coast Air Quality Management District ("SCAQMD") mass rate emission threshold. As shown in Draft EIR Table IV.C-11, the construction during Phase I of the East Campus would not exceed the localized significance thresholds for CO,  $NO_X$ ,  $PM_{10}$ , and  $PM_{2.5}$  and impacts would be less than significant. These modeled emissions take into consideration Project Design Features and Regulatory Compliance Measures that would ensure emissions are below these LST criteria for causing a significant impact.

<u>West Campus</u>: The results of the Local Significance Threshold analysis for Phase I of the West Campus are provided in Draft EIR Table IV.C-12, West Campus Phase I Construction LST Threshold and Maximum Project Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day, for purposes of applying the SCAQMD mass rate emission threshold. As shown in Draft EIR Table IV.C-12, the construction during Phase I of the West Campus would not exceed the localized significance thresholds for CO, NO<sub>X</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and impacts would be less than significant. These emissions take into account Project Design Features which are incorporated into the Project.

# Phase II (2024-2027)

<u>East Campus</u>: The results of the Local Significance Threshold analysis for Phase II of the East Campus are provided in Draft EIR Table IV.C-13, East Campus Phase II Construction LST Threshold and Maximum Project Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day, for purposes of applying the SCAQMD mass rate emission threshold. As shown in Draft EIR Table IV.C-13, the construction during Phase II of the East Campus would not exceed the localized significance thresholds for CO, NO<sub>X</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and impacts would be less than significant. These emissions take into account the Project Design Features incorporated into the Project.

# Phase III (2030-2034)

<u>East Campus</u>: The results of the Local Significance Threshold analysis for Phase III of the East Campus are provided in Draft EIR Table IV.C-14, East Campus Phase III Construction LST Threshold and Maximum Project Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day, for purposes of applying the SCAQMD mass rate emission threshold. As shown in Draft EIR Table IV.C-14, construction during Phase III of the East Campus would not exceed the localized significance thresholds for CO, NO<sub>X</sub>,  $PM_{10}$ , and  $PM_{2.5}$  and impacts would be less than significant.

<u>West Campus</u>: The results of the Local Significance Threshold analysis for Phase III of the West Campus are provided in Draft EIR Table IV.C-15, West Campus Phase III

Construction LST Threshold and Maximum Project Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day, for purposes of applying the SCAQMD mass rate emission threshold. As shown in Draft EIR Table IV.C-15, construction during Phase III of the West Campus would not exceed the localized significance thresholds for CO, NO<sub>X</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and impacts would be less than significant. These emissions take into account the Project Design Features incorporated into the Project.

### Phase IV (2038-2040)

<u>East Campus</u>: The results of the Local Significance Threshold analysis for Phase IV of the East Campus are provided in Draft EIR Table IV.C-16, East Campus Phase IV Construction LST Threshold and Maximum Project Emissions. The estimated area of disturbance is approximately one acre, the maximum area that would be disturbed during construction on any given day, for purposes of applying the SCAQMD mass rate emission threshold. As shown in Draft EIR Table IV.C-16, construction during Phase IV of the East Campus would not exceed the localized significance thresholds for CO, NO<sub>X</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> and impacts would be less than significant. These emissions take into account implementation of the Project Design Features incorporated into the Project.

## **Toxic Air Contaminants—Construction**

<u>East Campus</u>: The four phases of construction activities on the East Campus will span a total of approximately 7.56 years, with multi-year gaps between phases. Cancer risk during each of the four construction phases on the East Campus was calculated for the 30 off-site receptors and summed for all phases to determine the total cumulative exposure over the 7.56 years of construction. Cancer risks were calculated using the California Air Pollution Control Officer's Association ("CAPCOA") guidance document Health Risk Assessments for Proposed Land Use Projects.

Off-site residential exposures at the 30 receptor locations surrounding the East Campus were calculated for the four phases of construction and then summed to estimate total cumulative cancer risk during the 7.56-year construction period. Draft EIR Table IV.C-18, East Campus Off-Site Residential Exposure, presents the cancer risk calculated for the Maximum Exposed Individual Receptor ("MEIR") during the East Campus construction period. Input data assumed an adult receptor with a breathing rate of 302 L/kg-day being exposed 350 days per year, which is conservative since there will be no construction on Sundays and national holidays.

The MEIR for the East Campus off-site residential exposure scenario will be exposed to a cancer risk of approximately 4.96 in one million during Project construction. The cancer risk is below the SCAQMD incremental significance threshold of 10 excess cancers per million for implementation of an individual project. Construction activities on the East Campus will not expose off-site residents to substantial pollutant concentrations. Air quality impacts to off-site residents during East Campus construction will be less than significant.

On-site exposures at the East Campus were evaluated for adults (teachers and staff and on-site workers) and children (students), separately. The adult exposures were evaluated cumulatively over the four construction phases, and child exposures on the East Campus were considered individually for the four phases since it is unlikely that a student would remain on the East Campus for longer than one phase of construction. However, it is possible that a student would be present on Campus during multiple phases of construction if they were to attend the Brentwood School at both the West Campus and the East Campus for all grades K through 12. The analysis under the West Campus exposures addresses the maximum potential cumulative exposure to a student who could attend school throughout multiple construction phases.

Diesel Particulate Matter ("DPM") concentrations at a total of 440 on-site receptors were analyzed to determine the maximum potential on-site exposure during East Campus construction. The configuration of construction areas varies within each Phase of the Project, resulting in variations in on-site receptor locations for each phase. As a precursory screening tool, sensitive receptors were also placed within the construction areas to determine maximum potential on-site exposures. These estimates would be higher than any exposure to a teacher, staff member, or student outside the construction zones.

The maximum cumulative exposure to an adult on-site receptor during the 7.56 years of construction was 2.64 in one million. The maximum single-phase exposure to an on-site child receptor during East Campus construction was calculated to be 3.54 in one million. The construction phases on the East Campus are scheduled to be separated by enough time that a student would only be exposed to a single phase of construction DPM emissions on the East Campus. A hypothetical maximum exposure scenario combining exposures on the West Campus and the East Campus is presented in the following discussion. Both the adult and child on-site cancer risks are below the applicable SCAQMD incremental cancer risk significance threshold of 10 in one million. Construction of the Project on the East Campus will not generate significant air quality impacts to on-site receptors.

<u>West Campus</u>: Off-site exposures near the West Campus were quantified using the same methodology as the East Campus analysis. The total duration of construction activities on the West Campus for the two phases combined is approximately 4.27 years. Draft EIR Table IV.C-19, West Campus Off-Site Residential Exposure, presents the results of the HRA calculations for the off-site MEIR near the West Campus.

Project construction activities on the West Campus will result in an off-site MEIR cancer risk of approximately 1.73 in one million from exposure to DPM. This value is below the SCAQMD significance threshold for an individual project's incremental cancer risk of 10 in one million. Construction of the Project on the West Campus will not expose off-site

sensitive receptors to substantial concentrations of DPM. Air quality impacts to off-site sensitive receptors resulting from construction of the Project on the West Campus will be less than significant.

On-site exposures to sensitive receptors from Project construction on the West Campus were estimated based on a receptor grid containing 300 receptor locations. The precursory screening method was used to determine maximum possible exposures, including within the construction zones. The maximum cumulative adult exposure at an on-site location was calculated to be 3.44 in one million. The maximum single-phase child exposure during West Campus construction was calculated to be 6.12 in one million during Phase III, which is anticipated to occur from 2032-2034.

In the event that a student enrolls in the West Campus near the start of Phase I construction, it is possible that additional exposure could occur on the East Campus assuming that student continues at the Brentwood School through grade 12. The maximum exposure would occur between West Campus Phase III construction from 2032 to 2034 and East Campus Phase IV construction from 2038 to 2040. Due to the multiyear gaps between phases, no student would be enrolled for three full phases of construction. While there could be partial exposure overlap occurring over three phases, exposure to two full phases of construction was analyzed since two full phases result in a maximum potential exposure.

The maximum possible on-site student exposure during West Campus Phase III construction would be 6.12 in 1 million. The maximum possible on-site student exposure during East Campus Phase IV construction was calculated to be 2.58 in 1 million. The maximum cumulative exposure from Phase III on the West Campus and Phase IV on the East Campus would be approximately 8.70 in 1 million, which remains below the SCAQMD incremental threshold of 10 in 1 million. This exposure value was calculated assuming that the student receptor would remain stationary at the location of highest concentration over the entire duration of the construction phases. In actuality, students would move about the Campus during the day and would spend most of the day inside classrooms. Therefore, the calculated exposure represents a conservative estimate of the maximum possible exposure to a student on Campus.

Both the adult and child exposures are below the applicable SCAQMD significance threshold of 10 in one million for incremental cancer risk increase. As such, construction of the Project on the West Campus will not expose sensitive receptors to substantial pollutant concentrations. Air quality impacts resulting from construction activities on the West Campus will be less than significant.

### **Chronic Hazard Index Screening**

As shown in Draft EIR Section IV.C, there is no reasonable circumstance under which the Project would release DPM in substantial quantities to produce significant air quality impacts associated with emissions of TACs. The incremental cancer risk increase and chronic hazard index remain below applicable regulatory thresholds of significance. Construction of the Project will not expose sensitive receptors to substantial TAC concentrations; impacts will be less than significant during Project construction.

**Project Design Features and Regulatory Compliance Measures:** The City finds that the Project Design Features AQ-1 and AQ-2, and Regulatory Compliance Measures AQ-1 and AQ-2, incorporated into the Project, reduce the potential construction air quality emission impacts of the Project. The Project Design Features and Regulatory Compliance Measures were taken into account in the analysis of potential impacts.

# **Operations**

<u>East Campus Operations</u>: In 2020, Phase I of the East Campus would be completed and all of the 265-student enrollment increase would be in effect. The Project would result in an increase in building space of approximately 85,960 square feet (the 85,000square-foot Middle School Classroom Building plus the 960-square-foot expansion of Temple Hall). The increase in enrollment and faculty and staff would increase the vehicle trips and related mobile source air emissions. No net peak-hour vehicle trips increases would occur based on the implementation of Mitigation Measure MM TR-1 as described in Draft EIR Section IV.J, Transportation and Circulation. A summary of the emissions of criteria air pollutants from increased building area operations emissions is provided in Draft EIR Table IV.C-21, East Campus Regional Operational Emissions Year 2020 Full Enrollment. Based on the results shown in Draft EIR Table IV.C-21, operations of the East Campus following completion of Phase I and phased-in increases in student enrollment by 2020 would result in emissions that do not exceed the significance thresholds.

With additional building space constructed in Phases II and III, the Project would generate increased stationary source regional emissions over time. As such, full buildout of the Project in 2040 was modeled to account for increases in air emissions resulting from Phases I, II, III, and IV, collectively. As the School will reach maximum enrollment in 2020, no increase in students, staff, or faculty is anticipated thereafter. A summary of the emissions of regional criteria air pollutants from increased building area operations and mobile emissions is provided in Draft EIR Table IV.C-22, East Campus Regional Operational Emissions Year 2040 Full Build-Out and Enrollment. Based on the results shown in Draft EIR Table IV.C-22, operations of the East Campus following complete build-out of Phases I, II, III, and IV and increases in student enrollment would result in emissions that do not exceed the significance thresholds. Therefore, operations at the East Campus following completion of the Project would result in a less than significant impact on regional air quality.

<u>West Campus Operations</u>: In year 2020, Phase I of the West Campus would be completed, and the Campus would include operations of the 28,500-square-foot Saltair Annex. Enrollment would remain capped at 300 students, therefore, no increase in mobile source emissions would occur. A summary of criteria pollutant air emissions is

provided in Draft EIR Table IV.C-23, West Campus Regional Operational Emissions Year 2020. Based on the results shown in Table IV.C-23, operations of the West Campus following completion of Phase I would result in emissions that do not exceed the significance thresholds. Therefore, operations at the West Campus following completion of Phase I would result in a less than significant impact on regional air quality.

Operational emissions at the West Campus would continue to increase incrementally with future increases in building space. Upon complete build-out in 2034, there would be a total of approximately 32,120 square feet of net new building space, which accounts for the net difference from new construction and demolition of existing structures. These include the combined construction of the Saltair Annex (28,500 square feet), Admissions Building (8,000 square feet), and New Classroom Building (24,500 square feet); and the reduction in area from demolition of the existing Main Classroom Building (20,466 square feet), and the Admissions Building, Child Care Building, Science Building, Art Building, Music Building, and Community Room Building (8,415 square feet collectively). A summary of the air emissions from the added building area upon total build-out of the Campus is provided in Draft EIR Table IV.C-24, West Campus Regional Operational Emissions Year 2034—Full Build-Out.

<u>Combined Regional Operations</u>: In considering the total emissions from operations at both Campuses, the modeled emissions data summarized previously were combined and compared to the SCAQMD thresholds. To conservatively estimate the total emissions for both Campuses, two sets of emissions were calculated. First, the operational year of Phase I of the West Campus was combined with the operational year for Phase I of the East Campus for year 2020 operational emissions. Second, the emissions for the operational year of completed build-out of the West Campus was combined with the emissions from the complete build-out of the East Campus in 2040. The combined maximum daily operational emissions for both the East and West Campuses are provided in Draft EIR Table IV.C-25, Combined Regional Operational Emissions Years 2020 and 2040. Based on the results provided in Draft EIR Table IV.C-25, air emissions would not exceed the SCAQMD thresholds for operations. Therefore, the Project operations upon full build-out would not result in a less than significant impact on regional air quality.

<u>Microscale CO Hotspot Impact Analysis</u>: CO is produced in greatest quantities from vehicle combustion, and is usually concentrated at or near ground level because it does not readily disperse into the atmosphere. As a result, potential air quality impacts to sensitive receptors are assessed through an analysis of localized CO concentrations. Areas of vehicle congestion have the potential to create "pockets" of CO called "hotspots." These pockets have the potential to exceed the State ambient air quality 1-hour standard of 20 ppm or the 8-hour standard of 9 ppm. Note that the federal levels are based on 1- and 8-hour standards of 35 and 9 ppm, respectively. Thus, an exceedance condition would occur based on the State ambient air quality 1-hour standard. As such, exceeding the State ambient air quality 1-hour standard

of 20 ppm or the 8-hour standard of 9 ppm would constitute a significant air quality impact from the creation of substantial concentrations of CO.

The SCAQMD suggests that localized CO impacts be evaluated at intersections due to increases in project-related off-site mobile sources. The SCAQMD recommends performing a localized CO impact analysis for intersections that change from level of service (LOS) C to D as a result of the project and for all intersections rated D or worse where the project increases the volume-to-capacity ratio by two percent or more. As discussed in Draft EIR Section IV.J, Transportation and Circulation, no Project intersection falls under the SCAQMD's criteria requiring a more detailed localized CO impact analysis since the proposed Project will result in no new net peak-hour vehicle trips. As a result, no significant Project-related impacts would occur relative to future CO concentrations.

<u>Toxic Air Contaminants—Operations</u>: During operations, the on-site use of hazardous materials could potentially generate TAC emissions. However, the small quantities of hazardous materials to be used and stored on the East and West Campuses during operations are limited to those typically associated with general maintenance of the School grounds and for educational purposes, such as science applications. The Brentwood School has a protocol and safety procedures for storing hazardous substances. In addition, the City Fire Department Unified Program requires an inventory of the chemicals and amounts, and the storage is routinely inspected by the City Fire Department. Any increases in chemicals will be inventoried as part of the Unified Program and would be subject to the regulatory existing programs, policies, and procedures related to hazards and materials safety. The Project would not be a source of toxic air contaminants to sensitive receptors, nor increase the likelihood of potential exposure. Potential impacts related to TACs during operations would be less than significant.

2. Odors

<u>Construction</u>: During the Project's construction phase, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings and other interior and exterior finishes, and roofing may produce discernible odors typical of most construction sites. SCAQMD Rule 1113 limits the amount of volatile organic compounds ("VOCs") from architectural coatings and solvents to further reduce the potential for odiferous emissions. Although these odors could be a source of nuisance to adjacent uses, they are temporary and intermittent in nature. In addition, as construction-related emissions dissipate away from the construction area, the odors associated with these emissions would also decrease and be quickly diluted. Therefore, impacts associated with objectionable odors during Project construction would be less than significant.

<u>Operations</u>: According to the SCAQMD's CEQA Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food

processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project does not include any uses identified by the SCAQMD as being associated with odors. However, the School would continue to operate a cafeteria on both Campuses that has the potential to emit odors through cooking and charbroilers. Use of the cafeteria could increase due to the proposed increase in students. The Project would minimize the potential incremental increase in the release of odors from the cafeterias with odor-reducing equipment as necessary. Garbage collection areas for the Project would be covered and situated away from the property line and sensitive uses. Good housekeeping practices would be sufficient to prevent nuisance odors. Therefore, potential odor impacts during Project operation would be less than significant.

# 3. Consistency With SCAQMD Air Quality Management Plan ("AQMP")

As set forth in Section IV.C of the Draft EIR, the Project would result in less than significant impacts with regard to localized concentrations of  $NO_X$ , CO,  $PM_{10}$ ,  $PM_{2.5}$ , and  $SO_2$  during construction and operation. Consequently, the Project would not have a long-term impact on the region's ability to meet State and federal air quality standards and would be consistent with the AQMP.

In addition, Project development would not increase the frequency of existing air quality violations, cause, or contribute to new violations, or otherwise delay the attainment of the air quality standards or interim emissions reductions specified in the AQMP. Moreover, the Project would not exceed the assumptions utilized in preparing the AQMP. Therefore, the Project would be consistent with and not conflict with or obstruct implementation of SCAQMD's AQMP.

# 4. Cumulative Impacts

Development of the Project in conjunction with the related projects in the Project site vicinity would result in an increase in construction and operational emissions in an already urbanized area of the City of Los Angeles. However, cumulative air quality impacts from construction, based on SCAQMD guidelines, are not analyzed in a manner similar to project-specific air quality impacts. 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. According to the SCAQMD, individual development projects that generate construction or operational emissions that exceed the SCAQMD recommended daily regional or localized thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Therefore, because the construction-related and operational daily emissions associated with the proposed Project would not be cumulatively considerable.

The Project's impacts from TAC emissions during construction would be less than significant. As such, cumulative toxic emission impacts during construction would be less than significant.

Cumulative TAC emissions during long-term operations would be less than significant. In addition, the Project would not result in any substantial sources of TACs and therefore would not contribute to a cumulative impact.

Potential odor impacts from the related projects are anticipated to be less than significant individually and the cumulative impacts of the Project and the related projects would also be less than significant.

The Project would not jeopardize the attainment of air quality standards in the 2012 AQMP for the South Coast Air Basin and the Los Angeles County portion of the South Coast Air Basin. As such, the proposed Project would not have a cumulatively considerable contribution to a potential conflict with or obstruction of the implementation of all applicable air quality plans.

# C. Greenhouse Gas Emissions ("GHG")

1. Construction and Operational Impacts: As part of the Statewide requirement to reduce GHGs, California Air Resources Board's ("CARB") Climate Change Scoping Plan instructs local governments to establish sustainable community strategies to reduce GHG emissions associated with energy, transportation, and water as required under Senate Bill ("SB") 375. The Climate Change Scoping Plan recommends energyefficiency measures in buildings such as maximizing the use of energy-efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes. The Climate Change Scoping Plan also encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and to reduce fossil fuelbased energy. In addition, planning efforts that lead to reduced vehicle trips while preserving personal mobility along with programs and designs that enhance and complement land use and transit strategies are effective means for a project to achieve consistency with plans, policies, and regulations. Accordingly, the City has adopted several plans and ordinances that achieve compliance with the State laws and that establish a local framework for the Project to comply with GHG reduction requirements.

The Project will be required to comply with the City of Los Angeles GHG reduction policies, ClimateLA, and the Green Building Code, which are all designed to reduce GHG emissions for the City to meet the reduction requirements of Assembly Bill ("AB") 32. In complying with the City of Los Angeles Green Building Ordinance, the Project design and future planning emphasizes improving energy conservation, energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence for the Campus as a whole. Specifically, in compliance with the City's Green Building Code, the Project would incorporate

environmentally sustainable design features that would be equivalent to the Silver level under Leadership in Energy and Environmental Design "LEED.". The Project also includes sustainable design features that will reduce GHG emissions. These features include using energy-conserving products for the lighting system, an HVAC system, the installation of shade trees, and vehicle trip reductions through a transportation demand program ("TDM") program.

Therefore, as shown in Draft EIR Section IV.L, the Project is consistent with all local and State plans, policies, and regulations. Impacts of the Project would be less than significant.

2. <u>Cumulative Impacts</u>: The Project's GHG emissions would not be considered to be substantial when compared to Statewide GHG emissions. In addition, the effects of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants, as discussed in Draft EIR Section IV.C, Air Quality. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known, but that quantity is enormous, and no single project would be expected to measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or microclimates.

In order to achieve Statewide goals, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. However, currently, there are no applicable significance thresholds, specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative level. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions.

Draft EIR Table IV.L-6 illustrates that the Project Design Features and State mandates would contribute to GHG reductions. These reductions represent a break from Business As Usual ("BAU") and support State goals for emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's Climate Change Scoping Plan for the implementation of AB 32 through 2020. The Project's features and GHG reduction measures make the Project consistent with the goals of AB 32.

The Project is consistent with the approach outlined in the CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. The location and design of the Project reflect and support these core objectives. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use green building features as a framework for achieving cross-cutting emissions reductions. The Project also would comply with the City of Los Angeles Green Building Ordinance, which emphasizes improving energy conservation, energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project Design Features would advance these objectives.

Consistent with State CEQA Guidelines, Sections 15064(h)(3), there is a presumption of less-than-significant impacts with respect to climate change for a project that complies with a previously approved plan for the reduction of GHG emissions that includes specific requirements that will reduce or avoid the cumulative impact for the geographic area in which the project is located. This is achieved through compliance with all plans, policies, and regulations, as discussed previously.

In addition, the Project's total combined annual GHG emissions would be below the SCAQMD's draft threshold of 3,000 MTs per year for commercial/residential projects. While the SCAQMD has not formally adopted this threshold, it provides further substantial evidence that the Project will have a less than significant impact with respect to GHG emissions.

In the absence of applicable adopted standards and established significance thresholds, and given the Project's consistency with State and City GHG emission reduction goals and objectives, the Project's contribution to the cumulative impact of global climate change would be less than significant.

3. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GHG-1 and GHG-2, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential greenhouse gas emissions of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

# D. Geology

# 1. Geologic Hazards

<u>Fault Rupture</u>: No known active faults traverse the East or West Campuses, nor do the Campuses lie within the boundaries of an "Earthquake Fault Zone" as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act. The potential for ground rupture due to an earthquake beneath each Campus is considered remote. Project construction would be required to comply with the City of Los Angeles Building Code. Therefore, impacts associated with seismic rupture at the East and West Campuses would be a less than significant.

<u>Flooding, Inundation, and Tsunami</u>: According to the Los Angeles Flood Hazard Map, a "100 Year Flood Zone (Contained in a Channel)" is mapped within the East Campus within the Middle School Athletic Field. At present, all stormwater is collected through

catch basins and concrete swales and is then conveyed to the main storm drain system. This system consists of 66-inch and 57-inch reinforced concrete pipes ("RCP") that run across the center of the Campus from west to east. For the post-development storm drain system, additional catch basins, parkway drains, concrete swales, sump pumps, and detention tanks would be installed to reduce the runoff rates. The West Campus is not located in a County or City of Los Angeles flood or inundation hazard zone. Neither the East nor West Campus is mapped on flood rate insurance maps. Therefore, there would be no impact.

According to the Tsunami Inundation Map for Emergency Planning as prepared by the California Emergency Management Agency, the East and West Campuses are not located within a tsunami inundation area.

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no water storage facilities or bodies of water on or near the Campuses, so the Campuses are not subject to a seiche. A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Campuses would not be susceptible to tsunamis due to their distance from the ocean and their elevation above sea level. Therefore, Project impacts related to flooding, inundation, tsunami, and seiche would be less than significant.

<u>Subsidence</u>: Neither Campus is located within an area known subsidence associated with oil or groundwater withdrawal, peat oxidation, or hydro-compaction. The potential for subsidence to affect the Project is considered to be low. Therefore, impacts related to subsidence would be less than significant.

### 2. Landform Alteration

Grading at the East and West Campus will consist of cut and fill operations to create level building sites and associated Campus amenities. On the East Campus, grading activities would consist of an estimated 43,250 total cy of earthen material to be excavated, which would be exported. However, the development will occur generally within the same footprint of existing Campus facilities, within areas that have been previously graded and contain construction improvements. On the West Campus, the grading would include the cut and export of approximately 17,450 cy of soil, all of which would be exported. The Project will not expand Campus boundaries into new or previously undisturbed areas. The East Campus is built on the banks and within an arroyo, and has relatively steep slopes on the north, east, and west property lines, with a maximum grade differential of 30 feet. Most of the buildings and East Campus improvements will be placed on the floor of the arroyo generally below the prevailing elevations surrounding the immediate area. These buildings will also be anchored into the sides of the slopes rather than removing the slopes fully, allowing the East Campus to take shape around and within the existing geologic landforms. Therefore, impacts due to landform alteration at the East Campus will be less than significant.

Grading at the West Campus would consist of excavation and grading operations to create level building sites and associated Campus amenities, including a vehicle turnaround at the southwest corner of the Campus. A small area in the southwest portion of the West Campus slopes with a maximum 20-foot grade differential, but no new construction is planned this area. The remainder of Campus is relatively flat, has previously been graded to support existing Campus buildings and operations, and lacks any discernible landforms. The topographical features on the West Campus are neither distinct nor prominent given the surrounding topography. Therefore, impacts due to landform alteration at the West Campus will be less than significant.

# 3. Cumulative Impacts

Because the entire region is seismically active, the Project will be subject to similar seismic risks as the related projects listed in Section III, Environmental Setting and Related Projects and other projects located throughout the City of Los Angeles. Potential geologic hazards, including a fault rupture, strong seismic ground shaking, liquefaction, landslide, seismic-induced settlement, expansive soils, and corrosion potential are generally site specific, rather than cumulative in nature, because each development site has unique geologic considerations. Like the Project, each related project would be subject to uniform site development and construction standards that would reduce potential impacts related to geology to less than significant levels. In addition, the Project and the related projects would comply with the most stringent safety standards, consistent with all applicable local, State, and federal regulations, such as the Uniform Building Code ("UBC") and the Los Angeles Building Code ("LABC"). As a result, cumulative impacts with respect to geology will be less than significant.

4. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – seismic ground shaking and landform alteration. These project design features were taken into account in the analysis of Project impacts.

## E. Hazards and Hazardous Materials

1. Construction and Operational Impacts of Hazardous Materials, Proximity to a School, and Emergency Response Plan

## Exposure to Hazardous Materials during Construction and Demolition

<u>General Construction and Demolition</u>: During building construction, hazardous materials such as fuels, paints, solvents, and concrete additives could be used. These hazardous materials require proper management and disposal. Improper management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into soils and surface water runoff. Spills and leaks associated with construction-related substances such as coatings, soils, lubricants, paints, cleaning agents, and other fluids on the Campus sites would increase the potential for contamination and are general sources of potential short-term construction-related storm water pollution associated with Project implementation. The potential for construction materials to cause contamination will be reduced through the implementation of a stormwater pollution prevention plan ("SWPPP"), as provided in Draft EIR Section IV.G, Hydrology and Water Quality. Workplace safety is the prime responsibility of Cal/OSHA, whether protecting workers who may handle hazardous material at an industrial site or protecting certified personnel responsible for remediation of hazardous substances.

The demolition and construction activity would result in disturbances to underlying soils. In most cases, the soil disturbance will be minimal in preparing building pads and replacing existing concrete or asphalt surfaces. In some instances, there may be more extensive soils excavation, such as the subsurface Saltair parking lot on the West Campus or other soils that must be excavated and recompacted to meet geotechnical requirements on either Campus. Although no records of soil contamination are on file and no contamination has been observed during Phase I ESA investigations, it is possible that hazardous materials (not previously known) could be uncovered during soil movement or subsurface excavations. Uncovering hazards materials could result in them becoming airborne or exposing construction workers, or other people during the Campus long-term operations. In the event hazardous materials are discovered, earthwork would need to be suspended to assess the hazardous materials and to conduct any needed remediation efforts. Regulatory Compliance Measures, as described previously and required for the Project, would minimize the potential for

exposure during earthwork. Therefore, the potential to uncover unknown hazardous materials is less than significant.

<u>Asbestos-Containing Materials ("ACMs")</u>: Demolition of existing structures and remodels that require partial demolition could result in the release of ACMs. On the East Campus, the Project will include renovations to Temple Hall, the SLT Building, the North Quad and South Quad, the cafeteria, and the Student Life Center, and the demolition of the Middle School Gymnasium Building. On the West Campus, the Project will include demolition of the Main Classroom Building and the Admissions Building. Given the ages of the some of the structures, dating back to the 1920s, 1940s, and 1950s, these buildings could contain asbestos. Demolition may expose ACMs that may have been used in its construction including, but not limited to, drywall wall systems, vinyl flooring materials, flooring mastics, thermal insulation and acoustic materials, acoustic ceiling materials, stucco, window putty, piping, pipe fittings, and roofing materials. Federal and State regulations govern the renovation and demolition of structures where ACMs are present. All demolition that could result in the release of ACMs must be conducted according to federal and State standards.

The National Emission Standards for Hazardous Air Pollutants ("NESHAP") mandates that building owners conduct an asbestos survey to determine the presence of ACMs prior to the commencement of any remedial work, including demolition. Regardless of the date of the building construction and because of potential unknown renovations, SCAQMD Rule 1403 (d)(1)(A) requires an asbestos survey report prior to demolition to determine and verify the absence or presence of asbestos. If ACMs are found, the abatement of asbestos would be required prior to any demolition activities. Given that these structures are surveyed for ACMs and their removal or stabilization is provided for pursuant to applicable regulations, demolition of these structures would result in a less than significant impact associated with the potential release and/or improper disposal of ACMs.

Lead Exposure: Similar to the potential for ACMs, older building materials commonly included lead-based paints or other coating substances. Since several buildings will undergo renovations and demolition, there is the potential for demolition workers or handlers of the resultant debris to be exposed to lead that may be within any lead-based building materials. Building components and fixtures with a potential for lead-containing coatings include, but are not limited to, walls, windows, doors, window/door jambs, railings, poles, parking lot striping, and HVAC equipment. If surfaces with these lead-based paints are improperly disturbed, removed, or disposed of, construction workers could be exposed to lead in unsafe concentrations. OSHA regulations are in place to ensure that these materials are safely removed prior to or during demolition and renovation activities. Since these structures must be surveyed for lead-based paints and their removal or stabilization is provided for pursuant to applicable regulations, the demolition of these structures would result in a less than significant impact associated with potential release and/or improperly disposal of building components coated with lead-based substances.

<u>Polychlorinated Biphenyls ("PCBs")</u>: Removal of any equipment containing PCBs could result in potential release into the environment and exposure of construction workers and nearby building occupants to this substance. Since there are elevators on-site constructed before 1984, there is a small possibility that hydraulic fluids for elevators may contain PCBs, if the fluids have not been completely flushed since approximately 1984, although unlikely. Ongoing, elevator maintenance would test for PCBs and ensure the fluids meet current standards that prohibit PCBs. Also, there may be subsurface electrical circuits that could pose an electrocution hazard to construction workers. Removal, if required, would comply with local, State and federal regulations. In addition, no new electrical systems installed as part of the Project would contain PCBs. Therefore, the Project would not expose people to substantial risk resulting from the release or explosion of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards associated with PCBs. Therefore, no significant human exposure to PCBs is anticipated from operation of the Project.

# Exposure to Hazardous Materials Generated in the Project Vicinity

<u>Facilities with Hazardous Materials</u>: The East and West Campuses are located near properties that have been identified as hazardous materials sites. A Phase I Environmental Site Assessment ("ESA") was conducted for each Campus. The reports determined that neighboring properties within a one-eighth-mile radius identified hazardous materials sites that do not represent an environmental concern to the Project site. The determination is based on the reported operations at the facilities, the regulatory status of hazardous materials incidents at the facility (e.g., closed case), the distance between the facility and the site, or the hydrogeologically cross-gradient location. In addition, site reconnaissance revealed neither the presence of improperly stored hazardous chemicals nor any evidence of spills. Therefore, on-site impacts related to nearby hazardous materials sites are considered less than significant.

<u>Methane Gas</u>: According to the Methane and Methane Buffer Zones map prepared by the City of Los Angeles Bureau of Engineering, the Project site is not located within a City-designated methane buffer zone. Based on the City's mapping, potential impacts relative to methane gas during construction or operation of the Project are not expected, and methane mitigation measures to prevent the seepage of methane into the structures are not necessary. Should methane gas be discovered, the Project would be required to comply with Cal/OSHA requirements, the City's methane seepage regulations, and the specifications of the Los Angeles Department of Building and Safety ("LADBS"). Impacts from methane gas would be less than significant.

# New Uses Involving the Use, Storage, or Disposal of Hazardous Materials

Implementation of the Project could expose people to the risk of upset involving the use, storage, or disposal of hazardous materials. A number of existing operations on both Campuses regularly transport, use, and/or dispose of small amounts of hazardous materials used for education and cleaning purposes. Hazardous materials to be used

and stored on the East and West Campuses are limited to those typically associated with general maintenance of the School grounds and for educational purposes, such as science applications. These chemicals are considered hazardous if spilled into the environment or ingested. The Brentwood School Operations oversees the transport, use, and/or disposal of the existing hazardous materials used and generated on Campus, and all waste is transported by certified hazardous waste haulers. Implementation of the Project would not introduce new hazardous materials onto either the East or West Campus, but quantities of existing hazardous materials on the East Campus could incrementally increase as the Campus population increases with additional academic, administrative, and athletic facilities. The Brentwood School Operations maintains Unified Program forms, which include an inventory of chemicals, the amounts, and storage. These forms are routinely inspected by the Los Angeles Fire Department ("LAFD"). Any increases in chemicals will be inventoried as part of the Unified Program and would be subject to the regulatory existing programs, policies, and procedures related to hazards and materials safety. In the event of a real or potential release, the emergency procedure for hazardous materials spills and releases would be employed. This procedure requires notification to the LAFD and California Environmental Protection Agency ("CalEPA"). Given that any increases in transport, use, storage, and disposal of hazardous materials would be minimal and would be regulated under health and safety plans, potential impacts would be less than significant.

## **Emergency Response and Evacuation**

The Brentwood School maintains a Hazardous Materials Business Plan ("HMBP") in accordance with the City of Los Angeles Health Hazardous Materials Division ("HHMD"). These documents provide procedures addressing any releases of hazardous materials or hazardous waste. The HMBP identifies the staff responsible for notifying the LAFD in the event of an accidental release, the staff responsible for release response, and emergency medical facilities and describes alarm systems, evacuation procedures, and preventative measures. Should a hazardous waste incident occur on site, on-site personnel would respond pursuant to the HMBP and, depending on the type and location of the spill, the City or County Fire departments would respond.

In the event of a spill, fire, or other emergency, emergency vehicle access to the East and West Campuses would continue to be provided as it occurs now. For the East Campus, emergency access and evacuation routes include the two entrances along Barrington Place. The Campus provides both primary and secondary access to allow for incoming emergency response vehicles to enter at the same time that occupants of the School can exit. In addition, should emergency response be necessary immediately near the portion of the Campus near Layton Drive, emergency vehicles can park along Layton Drive, and pedestrian access or exits can be directed through the gated entry near Temple Hall. A new emergency access only gate would be added adjacent to the Middle School Athletic Field to provide emergency access to the field and adjoining areas. Furthermore, as discussed in detail in Draft EIR Section IV.J, Transportation and Circulation, impacts on access points to the East Campus site would be less than significant. At the West Campus, emergency vehicles and response personnel would be able to access the grounds and buildings from Saltair Avenue and Bundy Drive.

Within each of the Campuses, emergency access would be provided by setbacks between buildings and wide landscaped pedestrian plazas and athletic fields. At the time of building permit application, the LAFD would review the site plans to ensure that emergency response access and evacuation is adequate and meets both Fire Code and Building Code standards. Thus, the Project would result in less than significant impacts on emergency response and evacuation.

# 2. Cumulative Impacts

A cumulative hazards impact would occur if any related projects identified in Draft EIR Section III, Environmental Setting and Related Projects that would be located near the Project would contribute to a cumulative risk of release of a hazardous substance into the environment or a cumulative increase in the transport, use, or disposal of hazardous materials. As shown in Draft EIR Figure III-1, Related Projects Map, in Section III, Environmental Setting and Related Projects, the majority of related projects propose residential, retail, office, or civic (e.g., school, fire station) uses. No related projects would require the routine transport, use, or disposal of hazardous materials in quantities that could pose a significant safety risk. Furthermore, all related projects must comply with federal, State, and local procedures for the safe removal and remediation of any hazardous substances. Additionally, because all related projects are located within existing emergency response service areas with adequate roadway access, no related projects would require a new emergency response or evacuation plan, or would interfere with an existing emergency response or evacuation plan. Because the Project is also located within the area currently served by emergency response services and, thus, access is available to the Project, and because environmental safety impacts of the Project would be unique to the site and less than significant, the Project would not contribute to a cumulative impact in conjunction with related projects. As a result, the Project's cumulative hazards impact would be less than significant.

# 3. Project Design Features and Regulatory Compliance Measures

The City finds that Regulatory Compliance Measures HAZ-1 to HAZ-7, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential hazards and hazardous materials impacts of the Project. These Regulatory Compliance Measures were taken into account in the analysis of potential impacts.

# F. Hydrology and Water Quality

1. <u>Hydrology and Drainage Impacts</u>

# Construction - East Campus and West Campus

Construction of the Project would be conducted in four phases, which include both the East and West Campuses. It would involve the removal of approximately 43,660 square feet of existing building floor area on the East Campus and 28,881 square feet of existing building area on the West Campus. Other improved and landscaped areas would be graded and soil surfaces would be disturbed and exposed during the initial site preparation activities for each phase of construction. With the removal of existing structures and vegetation and an increase in bare soil within the grading areas, each Campus could temporarily generate a greater volume of surface runoff during Project Construction activities could also temporarily alter existing drainage construction. patterns. Construction of new drainage facilities would be required in a manner and sequence that would preclude flooding during Project construction. In addition, Project Design Features PDF WR-1 and PDF WR-2 would be implemented during construction to provide for temporary stormwater management. These plans would also minimize and/or control construction stormwater flows. Therefore, with implementation of these Project Design Features, construction of the Education Master Plan would result in a less than significant impact to surface water hydrology.

# **Operations**

<u>East Campus Operations</u>: Development under the Master Plan would include the construction of new buildings, renovations, and modifications to the Campus grounds, circulation, and parking structures, including relocation of the Barrington Place Sunset Gate vehicular entry and removal of the north parking lot.

The Hydrology and Drainage Report in Appendix IV.G of the Draft EIR defines the preand post-development hydrology conditions, locations for new drainage facilities, and existing locations of drainage structures. The post-development, impervious (paved) area would be approximately 6.66 acres compared to the existing condition of approximately 6.29 acres, and the pervious (unpaved) area would be approximately 2.99 acres compared to existing condition of approximately 3.35 acres of pervious areas. The Campus would be divided into 16 separate drainage areas, including two off-site tributary areas, as shown in Draft EIR Figure IV.G-5, Post-development East Campus Drainage Areas. The general drainage flow direction of pre-development conditions would remain similar to the post-development conditions, but runoff would be redirected to the improved storm drain system.

A 50-year frequency was adopted to calculate run-off flow rates for the Project. The post-development runoff flow rate for the East Campus would increase by 0.27 cfs, from 67.21 cfs to 67.47 cfs. Although the post-development runoff quantity would be slightly higher than the existing condition runoff, this increase is generated within the Project site; and would therefore be treated on-site with the use of best management practices ("BMPs"). Based on the Low Impact Development ("LID") Ordinance and Standard Urban Stormwater Mitigation Plan ("SUSMP") requirements in the City of Los Angeles, the Project would have to filter and treat the first 0.75 inches of rainfall and retain the runoff on the Project site. The detention tank proposed in Project Design Feature PDF

WR-4 would serve this purpose. The proposed detention tank would be designed to hold approximately 25 percent of the total runoff generated; therefore, what would be discharged off-site would actually be less than in the pre-development conditions.

The existing drainage volumes that correspond to the areas shown in Draft EIR Figure IV.G-5 are summarized in Draft EIR Table IV.G-3, East Campus Post-development Runoff Volumes. For the post-development storm drain system, additional catch basins, parkway drains, a concrete swale, a sump pump, and a detention tank would be installed to reduce the runoff rates, as well as to reclaim the water for other purposes such as irrigation. Approximately 6.98 acres of the East Campus and tributaries (72 percent) would generate approximately 49 cfs of runoff that would be conveyed to the newly implemented BMPs and then into the detention tank. Overflow from the detention tank would be carried to the existing storm drainpipes and detained water would be discharged under nonstorm event conditions. Approximately 1.89 acres (20 percent) of the Campus would generate approximately 13.21 cfs post-development runoff that would be conveyed through newly implemented BMPs consistent with LID standards, then to the existing 66- and 57-inch reinforced concrete storm drainpipes. Approximately 0.77 acres (8 percent of the Campus) would generate approximately 5.40 cfs that would be discharged directly to the parkway drains on the adjacent streets.

<u>West Campus Operations</u>: Development under the Master Plan on the West Campus would primarily include the construction of three new buildings and modifications to the Campus grounds, including adding retaining walls and removing existing facilities. The resulting impervious area would be approximately 2.23 acres (an increase of approximately 0.18 acres), while the pervious area would be reduced to 1.15 acres. The Campus would be divided into eight separate drainage areas as shown in Draft EIR Figure IV.G-6, Post-development West Campus Drainage Areas. The post-development impervious area would be approximately 65 percent of the total Campus area (and increase of approximately 4.3 percent). The runoff volume would increase by approximately 0.13 cfs to a total of 23.22 cfs.

The existing drainage volumes that correspond to the areas shown in Draft EIR Figure IV.G-6 are summarized in Draft EIR Table IV.G-4, West Campus Post-development Runoff Volumes. For the post-development storm drain system, additional catch basins, a concrete swale, BMPs to be determined in the SUSMP process, and two detention tanks are proposed to reduce the runoff rates, as well as to reclaim the water for other purposes such as irrigation. The on-site storm drainage system will meet the City's LID and SUSMP standards. This will involve filtering and treating, at a minimum, the first 0.75 inches of rainfall on-site to meet LID standards. Approximately 2.79 cfs (12 percent) of the post-runoff would be discharged to the parkway drain on Bundy Drive. Appropriate filters would be inserted to each catch basin that directly discharges the water to the streets to filter out pollutants before discharging to the City's storm drain system. The remaining 20.43 cfs (88 percent) would be treated on-site through the BMPs and then into the detention tanks for use in irrigation. Overflow from the tanks would be conveyed to the existing storm drain system on Sunset Boulevard. These

features would offset the peak flow rate increases on-site, as a result of increased impervious surfaces. Therefore, the peak runoff volume that would be discharged would remain unchanged at a Qpeak equal to 1.01 cfs, and stormwater discharge for the design storm up to and including the 50-year storm would be maintained or reduced. Thus, the Project would not exacerbate the existing conditions on-site during the projected 50-year developed storm event that would have the potential to harm people or damage property or sensitive biological resources. Additionally, the Project would not substantially reduce or increase the amount of surface water in a water body or create adverse changes to the movement of surface water or change the direction of flow. Most of the drainage patterns have already been established with the existing stormwater system that conveys all the stormwater to the south. Each new building would direct flows similar to existing conditions and would drain to the pipes that currently serve the Project area. Therefore, impacts on surface water hydrology would be less than significant.

# 2. <u>Water Quality Impacts</u>

## **Construction East Campus and West Campus:**

Construction would involve temporary vegetation removal, building removal, and parking lot removal, which would expose soil to erosion and the potential for sedimentation of Also, during on-site grading and building construction, hazardous watercourses. materials such as fuels, paints, solvents, and concrete additives could be used. These hazardous materials require proper management and disposal. Improper management of any resultant hazardous wastes could increase the opportunity for hazardous material releases into soils and surface water runoff. The temporary removal of soil-stabilizing features such as vegetation during Education Master Plan construction activities could accelerate wind- and water-driven erosion of soils that would increase sedimentation during storm events. Additionally, runoff typically picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. Spills and leaks associated with construction-related substances such as oils, lubricants, paints, cleaning agents, and other fluids on the Campus sites would increase the potential for contamination and are general sources of potential short-term construction-related stormwater pollution associated with Education Master Plan implementation. Excess sediments and contaminants could affect the water quality of the Santa Monica Bay. Therefore, construction-related erosion and contamination could result in a potentially significant impact to surface water quality. The impacts would be reduced through the implementation of the SWPPP. The SWPPP would include Campus maps, the identification of construction/contractor activities that could facilitate pollutants into stormwater, and a description of measures and/or practices to control these pollutants.

Compliance with National Pollutant Discharge Elimination System ("NPDES") permit requirements and preparation of a SWPPP would reduce construction-related erosion, sedimentation, and site-contamination driven water quality impacts to less than significant levels during construction. Project Design Feature PDF WR-1 is provided to ensure compliance with these requirements.

### **Operations East Campus and West Campus:**

Runoff from the East and West Campuses during Project operations has the potential to contribute pollutants to the receiving water body of the Santa Monica Bay, which could result in potentially significant water quality impacts. Runoff generated from the East and West Campuses would be subject to Section 402(p) of the CWA under the NPDES program. Development projects have responsibilities, under the NPDES Municipal Permit No. CAS004001, to ensure that pollutant loads do not exceed Total Maximum Daily Loads ("TMDLs") for downstream receiving waters. Development projects are required to submit and implement a SUSMP containing design features and BMPs appropriate and applicable to the project. The purpose of the SUSMP is to reduce operational (post-construction) pollutants in stormwater discharges. Prior to issuance of any grading or building permits, the City must approve the SUSMP.

Surface runoff would generally be directed into existing concentration points and storm drains within and outside the Project site that would then convey the water to storm drain systems ultimately draining to the Santa Monica Bay. A portion of the runoff from driveways, rooftops, courtyards, parking lots, and other hardscape areas would initially flow to biofiltration areas, bioswales, or commercial filters on inlets and catch basins to provide a cleanse of the water before it would enter the storm drain system. Surface water quality impacts could occur as a result of Project implementation under both dry weather and wet weather conditions.

Surface water quality pollutant sources would include the potential deposition of pollutants generated by motor vehicles, trash and debris, chemical spills, and the maintenance of landscaped areas. Parking lot/garage-generated pollutants typically contain atmospheric pollution, tire-wear residues, petroleum products, and oil and grease. Runoff from developed areas on the site is likely to include contaminants such as trash, bacteria, metals, organic pollutants, etc., which can escape primary treatment and enter natural watercourses. Runoff from landscaped areas can contribute biochemical oxygen demand ("BOD"), pesticide/herbicides/fungicides, and nitrates to surface and subsurface water bodies.

Upon implementation of the Project, storm drain systems would be installed with catch basins, concrete or vegetated swales, and detention tanks to reduce the runoff rates, as well as to reclaim the water for purposes such as irrigation. Additionally, a filter would be inserted into each catch basin that directly discharges runoff to the streets to filter out pollutants before discharging to the City's storm drain system. While the primary purpose of the detention basins would be to temporarily capture the increase in runoff as a result of new impervious surfaces for release under nonstorm event conditions, the detention would also allow for the surface runoff to be treated before being discharged into the City and County of Los Angeles' stormwater systems. With the implementation of Project

Design Features PDF WR-1 through PDF WR-5, impacts to water quality would remain at less than significant levels during Project operations.

# 3. <u>Groundwater Hydrology</u>

## **Construction**

Construction of the Project includes earthwork involving preparation of the surface to support structures. As described in the geotechnical engineering reports prepared for the Project, included as Appendix IV.E of the Draft EIR, groundwater was encountered from 15 to 22 feet below ground level near fill/terrace deposits. At the East Campus, earthwork on the top of the slopes near Layton Drive to support the Northeast Classroom Building and related improvements is not likely to encounter groundwater due to their elevation. However, earthwork within the floor of the basin portion of the Campus to support the Middle School Classroom Building and parking garage, Middle School Gymnasium, and Upper School Arts Building and parking garage, may encounter groundwater as shallow as 15 feet below the surface. If caissons and over-excavation of the subsurface are required to support a suitable foundation for the structures, groundwater may be encountered requiring temporary construction dewatering. construction dewatering is required, local groundwater flow direction and depth may be temporarily affected within the area of construction. However, if dewatering occurs, the water would be discharged in the open fields to southeast of the construction area. Therefore, it would not draw water across basin boundaries, thereby allowing the water to percolate through the ground surface and re-enter the groundwater table within the flow direction that occurs naturally. Therefore, it is expected that there would be no losses of groundwater into the storm drain system as a result of temporary construction dewatering.

Given that no water supply wells would be affected and construction dewatering is not anticipated to adversely impact the rate or direction of flow of groundwater, the project will not significantly affect the groundwater flow and groundwater hydrology impacts would be less than significant.

# **Operations**

Upon completion of the Project, there would be a net conversion of existing pervious surfaces to impervious surfaces, which would have the potential to reduce groundwater recharge. At the East Campus, the post-development, impervious (paved) area would be approximately 6.66 acres compared to the existing condition of approximately 6.29 acres, and the pervious (unpaved) area would be approximately 2.99 acres compared to existing conditions of approximately 3.35 acres of pervious areas. At the West Campus, the resulting impervious area will would be approximately 2.23 acres (an increase of approximately 0.18 acres over the existing condition of 2.05 acres), while the pervious area would be reduced to 1.15 acres, a reduction of approximately 0.18 acres over the existing conditions of approximately 0.18 acres over the existing condition of approximately 0.18 acres over the existing conditions of 1.33 acres.

groundwater recharge due to the overall increase in impervious area, the potential loss in groundwater recharge is not considered substantial from a regional hydrologic perspective.

At the East Campus, there would not be any below grade structures other than support caissons and footings. The parking garages below the Middle School Classroom Building and the Upper School Arts Building would be placed above the existing ground surface. As such, no long-term dewatering would be necessary with the operation of the Project. At the West Campus, groundwater is expected to be well below 100 feet deep. While construction of the subterranean parking at the Saltair Annex and the New Classroom Building will be below grade, the structures would be single-story and would not be within groundwater. Therefore, no permanent dewatering at the West Campus would occur.

# 4. <u>Groundwater Quality</u>

## **Construction**

As described in Draft EIR Section IV.F, Hazards and Hazardous Materials, construction would include the use of chemicals that could contaminate groundwater. Improper management of any resultant hazardous wastes could increase the opportunity for pollutants to spill into soils and percolate to groundwater. The potential for construction materials to cause contamination will be reduced through the implementation of a SWPPP. The Project would include excavations to construct buildings. Discharges of ground water from construction and dewatering may include water from temporary construction dewatering operations. Discharges of groundwater from construction and project dewatering is regulated by NPDES Permit No. CAG994004. Compliance with all applicable federal, State and local requirements concerning the handling, storage and disposal of hazardous waste would effectively reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area of an existing contamination, increase the level of groundwater contamination or cause the violation of regulatory water quality standards at an existing production well as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Compliance with NPDES permit requirements and preparation of a SWPPP would reduce construction-related erosion, sedimentation, and site-contamination driven water quality impacts to less than significant levels during construction. Impacts to groundwater quality as a result of construction of the Project would be less than significant.

# **Operations**

Operational activities that could affect groundwater quality include surface spills from the handling of hazardous materials. As described in Draft EIR Section IV.F, Hazards, this would involve small quantities that, if spilled, would likely occur on impervious surfaces where they are used, are cleaned up in a timely manner. It is highly unlikely that spills of chemicals used in operations of the Campuses would infiltrate the soil and enter groundwater. No underground fuel storage tanks would be installed as part of the operations at either the East or West Campus. In addition, while the development of new school facilities would increase the use of existing on-site hazardous materials, compliance with all applicable existing regulations would prevent the Project from expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15 and the Safe Drinking Water Act.

Furthermore, as described above, operation of the Project would not require extraction from the groundwater supply based on the depth of excavation for the proposed uses

and the depth of groundwater below the Project site. Additionally, the Project would include the installation of infiltration systems as a means of treatment and disposal of the first flush or first 0.75 inch of rainfall for any storm event, which would allow for treatment of the on-site stormwater prior to infiltrating to the groundwater below. Operation of the Project would result in a less-than-significant impact on groundwater quality.

# 5. <u>Cumulative Impacts</u>

**Hydrology and Drainage**: Implementation of the proposed Project in combination with the list of related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, would not significantly impact surface water hydrology in the Santa Monica Bay watershed. The Project would be developed in an urbanized area and runoff from the Project site and the surrounding area would be served by existing storm drain systems. Runoff from the Project site and surrounding urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the related projects would also drain to the surrounding street system.

Additionally, given the location of the Brentwood School and the related projects, it is not expected that cumulative development would substantially alter the existing drainage pattern of the area, including the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation, flooding, or the exceedance of existing or planned stormwater drainage systems. With the exception of the Santa Monica Mountains, the Santa Monica Bay watershed within the limits of the City of Los Angeles is composed mainly of urban uses. As a result, most of the drainage system in the watershed consists of developed, engineered storm channels. Given that development patterns in the area have been established, it is unlikely that there would be a substantial alteration of drainage systems and watercourses in those areas because the alignment of such facilities have been established and capacities have been determined based on the uses located in the watershed. This indicates that the amount of runoff would not substantially increase, thereby avoiding substantial increases in erosion, siltation, and flooding and by preventing the exceedance of the stormwater drainage system. In accordance with City requirements, related projects and other future development projects would be required to implement BMPs such that post-development peak stormwater runoff discharge rates would not exceed the estimated predevelopment rates. Furthermore, the City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Consequently, there would not be a cumulatively significant impact with implementation of the Education Master Plan and, therefore, the Project and related projects would result in less than significant cumulative surface water hydrology impacts.

<u>Surface Water Quality</u>: Implementation of the proposed Project in combination with the list of related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, could result in the violation of water quality and/or waste discharge

requirements during construction and operation. However, each of the related projects would be subject to the same requirements as the proposed Project and, thus, would be required to prepare a LID Plan and, if applicable, a SWPPP for construction activities. SWPPPs are required if more than one acre is disturbed. As with the Project, the LID Plan and/or SWPPPs prepared for projects would incorporate BMPs by requiring controls of pollutant discharges that utilize best available technology ("BAT") to reduce pollutants. Related projects within the City of Los Angeles are required to submit and implement a SWPPP and a SUSMP containing design features and BMPs to reduce post-construction pollutants in stormwater discharges. Increases in regional controls associated with other elements of the MS4 Permit also would improve regional water quality over time. Potential water quality impacts of the related projects in combination with the Project would be less than significant with preparation and implementation of the SWPPP and SUSMP; compliance with the City's LID Ordinance; and the enforcement of these requirements by the City or County.

**Groundwater Hydrology**: Cumulative groundwater hydrology impacts could result from the overall use of groundwater basins located in proximity to the Project site and the related projects. In addition, interruptions to existing injection or supply wells, or designated spreading grounds would have the potential to affect groundwater levels. Any calculation of the extent to which the related projects would extract or otherwise directly use groundwater would be speculative. Nonetheless, the cumulative loss of groundwater in the region, as a result of either water extraction under the related project sites or extraction from local basins by the local water supply agency to accommodate the related projects, could adversely affect local and regional groundwater hydrology, including groundwater levels. However, as described above, no water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project site. In addition, Project development would not involve the temporary or permanent extraction of groundwater from the Project site or otherwise use the groundwater.

Furthermore, while implementation of the Project would result in an increase in impervious surface area, the Project would include the installation of infiltration systems, which would infiltrate the first flush or first 0.75 inch of rainfall for any storm event and offset the potential reduction in percolation resulting from Project development. However, development of the related projects could result in changes in impervious surface area within their respective project sites that would decrease the potential for groundwater recharge. Given that the related projects are located in an urbanized area, any reduction in groundwater recharge resulting from the overall net change in impervious area within the related project sites would be minimal in the context of the regional groundwater basin. Additionally, as infiltration systems are designed to infiltrate only small storm events or the first 0.75 inch of rainfall for any storm event, the infiltration of stormwater as a means of stormwater treatment and management within the Project site and related project sites would not result in a significant cumulative effect to groundwater hydrology.

The Project's contribution to cumulative groundwater hydrology would be less than significant.

**Groundwater Quality**: The Project and all related projects are required to comply with all applicable existing regulations that prevent contamination and must meet regulatory water quality standards. The Project is not expected to contribute to any cumulative effect on existing water production wells such that California Code of Regulations, Title 22, Division 4, Chapter 15, and the Safe Drinking Water Act would be violated. As with the Project, the related projects would be unlikely to cause or increase groundwater contamination. The Project contribution to groundwater quality would not be cumulatively considerable, and cumulative impacts would be less than significant.

## 6. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features WR-1 to WR-6, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential hydrology, groundwater and water quality impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

# G. Land Use and Planning

1. Community Division, Compatibility and Consistency with Land Use Plans and Policies

The Project would not divide the established community because the Project would occur within existing Campuses around which the community has been developed. Further, the Project would not significantly impact neighboring properties with regard to aesthetics, long-term noise, or air pollution, as discussed in each respective section of the impact analysis. Specific features of the Project and the compatibility with the surroundings are discussed in detail below.

## East Campus:

On the East Campus, the Project would renovate existing buildings, replace approximately 43,660 square feet of existing buildings with new or expanded facilities, and construct a totally new building area of approximately 287,960 square feet, resulting in a net addition of approximately 244,300 square feet.

Layton Drive Residential Neighborhood: The Project would include improvements to the buildings and grounds in the area of the Campus closest to the Layton Drive neighborhood. As described in Draft EIR Section II, Project Description, improvements would include interior renovations to the North Quad, the South Quad, and Temple Hall. There would also be a 960-square-foot addition to Temple Hall. The renovations and expansion of Temple Hall would not reduce the existing minimum setbacks from the Layton Drive boundary. Temple Hall's existing two-story height would be maintained, and Temple Hall, as expanded, would continue to be separated by landscaping, which is consistent with the residential character of neighborhood. Also along this side of the Campus, the Project would construct the Northeast Classroom Building and remove an existing parking lot along the northeast boundary. To enhance the buffer between the Campus and the residents, the Northeast Classroom Building would be set back more than 45 feet from the property line, and a landscaped buffer area with screening trees would be installed in place of the current parking lot. The Northeast Classroom Building would be two stories and approximately 28 feet in height, would maintain existing architectural styling, and would continue the current pattern of uses and building heights established by existing Campus facilities.

In addition, the Project would not result in traffic, aesthetic, light and glare, long-term noise, or air quality impacts that would significantly affect the residential neighborhood along Layton Drive. Therefore, the Project would continue the same land use pattern within the existing East Campus property and would not disrupt, divide, isolate, or otherwise significantly change the compatibility with the neighborhood along Layton Drive. Therefore, these impacts would be less than significant.

<u>Brentwood Village</u>: The Project would construct the Middle School Classroom Building and Upper School Arts Building nearest the Barrington Place and Brentwood Village areas. The Middle School Classroom Building would be 77 feet in height as measured from the floor of the former arroyo, and would generally be three stories above Barrington Place. It would face Barrington Place across from the apartment buildings and commercial space. Open space would be developed through the creation of a paved and landscaped forecourt adjacent to Barrington Place that would provide a setback along the full length of the Barrington Place frontage. This forecourt would accommodate part of the on-site queuing of vehicles, as well as a pedestrian entry. The frontage would appear similar in mass and scale to the existing commercial and apartment uses within Brentwood Village that align Barrington Place.

Primary access to the East Campus would continue to be from Barrington Place at the Sunset Gate. However, the entrance would be relocated to approximately 300 feet from the intersection of Barrington Place and Sunset Boulevard. Parking would be removed from the surface parking lots and placed below future buildings within parking garages.

The five-story Upper School Arts Building would be constructed near the rear of the cluster of four commercial buildings on the north side of Barrington Place, near the intersection of Chayote Street. The existing Middle School Classroom and Gymnasium Building that currently exists in roughly the same location would be demolished. At 78 feet 6 inches as measured under the LAMC, the Upper School Arts Building would be taller than the cluster of commercial buildings along Barrington Place which are approximately 25 feet in height. However, the ground level of the Upper School Arts building is approximately 30 feet below the adjacent commercial buildings, so the height difference from the top of roof to the top of roof would be approximately 23 feet 6 inches. Moreover, this new Campus building would not be conspicuous in the context of the commercial buildings in Brentwood Village because of its location behind these commercial buildings, which make up the more prominent foreground frontage along Barrington Place. The Project would make improvements to the East Campus entirely within the existing Campus property, in scale with the surrounding buildings, and would allow for continuation of the Campus's existing uses. In addition, the Project would not result in traffic, aesthetic, light and glare, long-term noise, or air quality impacts that would significantly affect Brentwood Village. Therefore, the Project would not disrupt, divide, isolate, or otherwise significantly change the compatibility with Brentwood Village, and impacts would be less than significant.

<u>Veterans Administration</u>: The Project would develop the Upper School Gymnasium Building and Upper School Arts Building on the East Campus near the VA property. The Project would result in the elimination of surface parking, a net increase in landscaped area, and nighttime lighting on the football and athletic field located on the VA property. Given the separation between these Project improvements and the VA housing and health-care facilities approximately 0.25 miles to the southeast, there would be no significant effect to the VA. The buildings and enrollment on the Campus would increase, but would not divide the VA from any community land use connections. Furthermore, the Project would not result in new traffic, aesthetic, light and glare, longterm noise, or air quality impacts that would significantly affect the VA uses. Therefore, the Project would not divide, disrupt, or isolate any VA uses, and impacts would be less than significant.

<u>Sunset Boulevard Corridor</u>: With the exception of the Middle School Classroom Building, the Project's new structures would be developed predominantly near the existing Campus buildings. The Middle School Classroom Building would be set back approximately 13 feet 6 inches from the Sunset Boulevard right-of-way. The Middle School Classroom Building would increase building mass near the corner of Sunset Boulevard and Barrington Place, which is currently vacant with the exception of the perimeter wall and landscaping. The scale of the structure would vary and reach a building height of approximately 57 feet above Sunset Boulevard where Sunset Boulevard intersects Barrington Place. The Middle School Classroom Building would be similar in land use type to other religious and educational institutional buildings that occur along the Sunset Boulevard Corridor in the Community Plan area and, thus, would reflect existing on- and off-site development patterns.

The Middle School Athletic Field would be replaced, but it would be centered slightly more north from its current location and would sit above the 223-space parking garage. However, the Field would remain below the bottom of the fence and ivy along the Campus' Sunset Boulevard boundary. Increased student athletic and physical education on the Field would not introduce a new land use that would conflict with or divide any uses along Sunset Boulevard.

The Sunset Boulevard Corridor would continue to separate the East Campus from the residential neighborhoods or other land uses further west. The Project would not result in new traffic, aesthetic, light and glare, long-term noise, or air quality impacts that would significantly affect the neighborhoods located across Sunset Boulevard. Therefore, the Project would not divide, disrupt, or isolate any existing uses to the west across Sunset Boulevard, and impacts would be less than significant.

<u>Summary of Impacts from Land Use Compatibility East Campus</u>: The Project would develop new school facilities within the existing Campus boundaries. Massing of the buildings would take advantage of the arroyo setting and the arrangement of the existing historic core, with no new building roofs exceeding in height those of the North Quad and South Quad along the Layton Drive side of Campus. Roofs would be generally flat, with decorative parapets. Buildings would be built into the slopes of the arroyo to minimize their presence at the perimeter of the Campus. The more active community-oriented program elements (i.e., the Middle School Classroom Building and Parking Garage, and the Upper School Arts Building with theater space) are located on the side of the arroyo closest to Barrington Place and Brentwood Village.

The surrounding land uses are in distinctive neighborhoods that are not directly connected physically the areas within which the Project would construct new buildings.

Therefore, the Project would not create a physical separation or barrier between existing neighborhoods or community. In addition, as discussed in each of the individual impact analysis sections of the Draft EIR, the Project would not cause significant impacts to the surrounding neighborhoods as a result of incompatibilities in aesthetic appearance, light and glare, air quality, long-term noise, or traffic. As such, the Project's impacts on land use compatibility with the neighborhood and the potential for dividing the established community are less than significant.

## West Campus:

<u>Residential Neighborhoods North and West</u>: The Project would increase building mass within the West Campus along its north and west boundaries. The Saltair Annex would be built near the north property line, adjacent to the single-family home to the north. However, this building would maintain the similar land use pattern of the Campus and general building heights. There is no connectivity between the residences to the north and other areas that would be impacted by the Project. Although massing of the West Campus would increase near the residential area along Bundy Drive, development of the New Classroom Building and Administration Building within the westerly portion of the Project site would be a continuation of existing on-site uses with similar building scale. The Project would not divide, disrupt, or isolate any existing uses, and impacts would be less than significant.

Sunset Boulevard, University Synagogue, and Residential Areas to the South: The Project would construct West Campus improvements within the existing Campus footprint as a continuation of its existing uses and with a similar scale of buildings. The surrounding land uses are not physically connected to the area within which the Project would construct new buildings on the West Campus. Residential neighborhoods to the south are separated from the West Campus by Sunset Boulevard. University Synagogue and residential areas to the south are separated from the Campus by roadways. Therefore, the Education Master Plan would not create a physical separation or barrier between preexisting connected uses. In addition, as discussed in each of the respective impact analysis sections of the Draft EIR, the Project would not cause significant impacts to the surrounding neighborhoods as a result of incompatibilities in aesthetic appearance, light and glare, air quality, long-term noise, or traffic. The Project would not cause a divide between, disrupt, or isolate any existing land uses in the surrounding community to the south. Impacts would be less than significant.

<u>St. Martin of Tours</u>: The two-story Saltair Annex would replace the existing surface parking lot in the northeast corner of the West Campus, and a subsurface parking garage would be constructed under this new building. Also, the admissions and office building near the southeast corner would be demolished, and an open play area would be installed. The roofline of the Saltair Annex would peak at approximately 38 feet as measured in accordance with the LAMC. A layby would be added to allow for drop-offs for the on-site daycare facility. The Saltair Annex roofline would be slightly lower in height than the sanctuary of St. Martin of Tours directly across the street. The Saltair

Annex, as well as other West Campus improvements, would be an extension of the existing uses and would follow a land use pattern similar to that which occurs near St. Martin of Tours. Therefore, the Project would not divide, disrupt, or isolate St. Martin of Tours from any connections with the community. Impacts would be less than significant.

<u>Summary of Impacts from Land Use Compatibility West Campus</u>: The Project would develop new school facilities within the existing West Campus boundaries. Massing of the buildings would be placed along the perimeter at the north and west sides and predominantly away from Sunset Boulevard, which would serve to minimize their appearance from Sunset Boulevard. The surrounding land uses are in distinctive neighborhoods that are not directly connected socially or physically through the areas within which the Project would construct new buildings. Therefore, the Project would not construct a physical separation or barrier between existing neighborhoods or the community. In addition, as discussed in each of the individual impact analysis sections of the Draft EIR, the Project would not cause significant impacts to the surrounding neighborhoods as a result of incompatibilities in aesthetic appearance, light and glare, air quality, long-term noise, or traffic. As such, the Project impacts on land use compatibility with the neighborhood and the potential for dividing the established community are less than significant.

2. Consistency with the General Plan or Adopted Environmental Goals or Policies Contained in Other Applicable Plans

# Consistency with the Brentwood–Pacific Palisades Community Plan Land Use Designations

East Campus: The Brentwood–Pacific Palisades Community Plan designates the East Campus of the Brentwood School as Very Low II Density Residential, which corresponds to the single-family residential zoning designations RE15 and RE11. Private schools are conditionally permitted in these zones. Development on the East Campus is currently regulated by a CUP issued in 1992 that permits the existing Brentwood School uses. This CUP limits enrollment to 695 students and also limits new construction. As part of the Project, the maximum enrollment on the East Campus would be increased from 695 This student increase would be phased in over to 960 (265 new students). approximately four years, beginning around year 2017. This increase would include the relocation of 64 grade 6 students from the West Campus to a new Middle School facility to be developed on the East Campus, plus 201 new students (265 total). The School will seek a vesting CUP, including project-specific height and area (yard) requirements under LAMC Section 12.24-F, Zoning Administrator's Adjustment for an over-in-height fence, and Site Plan Review approval to implement the Education Master Plan on the East Campus. With these discretionary requests, if approved, the East Campus under the Project would be consistent with the adopted Community Plan land use designation, and impacts would be less than significant.

<u>West Campus</u>: The Brentwood–Pacific Palisades Community Plan designates the West Campus of the Brentwood School as Very Low II Density Residential, which corresponds to the single-family residential zoning designations RE15 and RE11. Private schools are conditionally permitted in these zones. The West Campus is currently regulated by a CUP, which limits enrollment to 300 students and also limits new construction. Maximum enrollment on the West Campus would remain unchanged. The School will seek a vesting CUP, including project-specific height requirements under LAMC Section 12.24-F, to allow for the new construction, a conditional use approval for employee childcare, and Zoning Administrator's Determination to allow grading to exceed the limitations of the Baseline Hillside Ordinance to allow a total of approximately 5,000 cy of grading and export in connection with construction of two buildings on the West Campus. If approved by the decision-makers, the West Campus under the Project would be consistent with the adopted Community Plan land use designation, and impacts would be less than significant.

The consistency of the Project with specific goals and objectives of the Brentwood– Pacific Palisades City of Los Angeles General Plan—Framework Element Community Plan is set forth in Draft EIR Table IV.H-2.

# Consistency With City of Los Angeles General Plan—Framework Element

Implementation of the Project is consistent with the goals and related objectives included within the Framework Element. The Project's improvements to the East and West Campuses would not alter the existing single-family residential areas surrounding each Campus. The Project includes renovating existing buildings and constructing new buildings; providing parking garages under new buildings to reduce surface parking; and adding athletic and open space Campus improvements without expanding the existing Campus boundaries. The Project's scale of development, the size and configuration of the buildings, and the overall density of the Campus buildings is consistent with existing conditions and would retain the existing character of the area. It is also consistent with the Framework Element's objectives to allow for intensification of uses in densely developed areas already served by community infrastructure and services and to reduce development pressure on natural resources and areas that could be preserved. As such, implementation of the Project would be consistent with the Framework Element's goals and objectives for low-density residential areas.

The East Campus and the adjacent Brentwood Village are designated within a Neighborhood District by the Framework Element. The primary goal for Neighborhood Districts is to create pedestrian-oriented space that provides local identity and commercial activity, and that support neighborhoods. To achieve this goal, the Framework Element suggests projects should reinforce existing neighborhoods and establish new neighborhood districts that accommodate a broad range of uses that serve the needs of adjacent residents, promote neighborhood activity, are compatible with adjacent neighborhoods, and are developed as desirable places to work and visit. Although the East Campus is located within a Neighborhood District, no commercial

uses currently occupy the Project site, and none are proposed as part of the Project. However, the Project would not conflict with or prevent improvements associated with a Neighborhood District for the adjacent Brentwood Village. Furthermore, the Project would enhance the visual interface with Brentwood Village with construction of a forecourt for the Middle School Classroom Building, which would form a readily identifiable entrance to the East Campus facing Brentwood Village.

The Project's compatibility with specific goals, policies, and objectives of the Framework Element is provided in more detail in Draft EIR Table IV.H-1, Framework Element Compatibility.

## City of Los Angeles Municipal Code

<u>East Campus</u>: The East Campus of the Brentwood School is zoned RE11-1 by the Zoning Code, and the West Campus is zoned RE15-1. Private school uses are permitted on RE zones with the approval of a CUP. At full build-out, the FAR on the East Campus would be approximately 1.2 to 1, which is well below the 3.0 to 1 FAR permitted under the current zoning.

A comment letter to the Draft EIR asserted that the Project Site's FAR is limited by the provisions of the Baseline Mansionization Ordinance ("BMO"), which limits "residential floor area" to 35 percent of the lot area. As the Project does not include any residential floor area or residential uses, the BMO does not apply. The City Council's findings adopting technical and clarifying changes to the BMO clearly demonstrate that the BMO is not intended to apply to schools. Therefore, the current zoning permits an FAR of up to 3 to 1.

The heights of new buildings on the East Campus would range from 28 to 78.5 feet under the LAMC's method of calculating building height. The maximum height for buildings within Height District No. 1 and zoned RE11 is 36 feet. However, LAMC Section 12.24-F allows the decision-maker to designate project-specific height and area requirements different from those otherwise applicable under the zoning. In addition, the Applicant will be seeking a Zoning Administrator's Adjustment for an over-in-height fence to allow sports netting adjacent to the new Middle School Athletic Field. With these approvals, the heights of all buildings and fences would be consistent with LAMC requirements.

Upon completion of the Project, there will be a net increase of 170 parking spaces on the East Campus, for a total of 305 spaces. The total parking supply on School-owned property will exceed LAMC requirements by 12 spaces.

The RE11 zone generally requires 25-foot minimum front yard setbacks and 11-foot side yard setbacks. However, as noted above, the decision-maker may allow project-specific yards as part of the CUP approval. Under the Project, the minimum setbacks of new East Campus buildings would be 0 feet from Barrington Place, 0 feet from Sunset

Boulevard, 45 feet from residential properties adjacent to Layton Drive, and 0 feet from the VA property. Upon approval of the new CUP, the East Campus would be in compliance with LAMC setback requirements.

Impacts would be less than significant with regard to consistency with the LAMC on the East Campus.

<u>West Campus</u>: The West Campus of the Brentwood School is zoned RE15-1. RE zones permit private school and employee childcare uses with approval of a CUP. At full build-out, the FAR on the West Campus would be approximately 0.6 to 1, which is well below the 3.0 to 1 FAR permitted under the current zoning.

The Department of City Planning has determined that the West Campus is subject to the height, yard, and lot coverage regulations of the Baseline Hillside Ordinance (Ordinance No. 181,624) ("BHO"). The Department also determined that because the West Campus does not currently include, nor under the Project will include, residential uses, the BHO's provisions pertaining to residential uses, including residential floor area, do not apply.

The BHO limits building height in the RE15-1 zone to 36 feet. The heights of new buildings on the West Campus would range from 38 to 54 feet under the BHO's method of calculating building height. However, as mentioned above, conditional use approval allows for modification to the otherwise applicable height, yard, and area regulations. Upon approval of the new CUP, the heights of all West Campus buildings would be consistent with BHO requirements.

The Project will result in a net increase of 24 parking spaces, for a total of 116 spaces. The total parking supply on the West Campus will exceed LAMC requirements by 92 spaces.

The BHO would require 25-foot minimum front yard setbacks and 11-foot side yard setbacks. Under the Project, the minimum setbacks of the new buildings would be 50 feet 4 inches from Bundy Drive, 19 feet 11 inches from Sunset Boulevard, 23 feet from Saltair Avenue, and 29 feet 3 inches from adjacent properties to the north. Therefore, the new buildings on the West Campus would be in compliance with the BHO's setback requirements.

The BHO limits the lot coverage of buildings and structures extending more than six feet above natural ground level to 40 percent of the lot area. At full buildout, the lot coverage for the West Campus would be approximately 27 percent. Thus, the West Campus would be in compliance with the BHO's lot coverage requirements.

"By-right" grading and soil export for properties located in the RE15 zone and within an area subject to the BHO is limited to 500 cy plus the numeric value equal to five percent of the total lot size, not to exceed 1,600 cy. In order to construct the subterranean parking and due to the sloped topography of the Campus, it is necessary to grade and

export a total of approximately 5,000 cy for the New Classroom Building and the Admissions Building. However, the BHO allows for grading in excess of the maximum "by-right" grading and export quantities provided that the grading and export quantities shall not exceed a total in cy equal to the sum of 500 cy plus the numeric value equal to five percent of the total lot size. Upon approval of the increased grading and export, the West Campus would be in compliance with the BHO's grading requirements.

Therefore, upon approval of the conditional use approvals and adjustments sought by the School, the Project would be consistent with the LAMC, and would not result in any significant impacts.

# City of Los Angeles Walkability Checklist

The Walkability Checklist addresses the City's goals and policies for achieving walkable neighborhoods. It includes provisions for sidewalks, crosswalks/street crossings, onstreet parking, utilities, building orientation, off-street parking and driveways, on-site landscaping, building facades, and building signage and lighting. A series of objectives, policies, and implementation strategies accompanies the Walkability Checklist. The Project has incorporated these walkability goals into the Project design. The City's Walkability Checklist is tailored to promote pedestrian activity within residential, commercial, and mixed-use use developments. Many institutional uses, such as elementary, middle and high schools, do not typically offer extensive pedestrian activity with their surroundings because of the schools' needs to monitor their students' activity and ensure the safety of the students. As such, the Brentwood School, like many schools, maintains continuous walls and fences along its perimeters. However, as described below, the Project would incorporate, where applicable, the implementation strategies presented in the Walkability Checklist. In addition, the Project would implement a number of relevant design elements within each of the Campuses and provide for the safety of pedestrians in the immediately surrounding areas. The Project compatibility with the Walkability Checklist is provided in Draft EIR Table IV.H-3. Walkability Checklist Compatibility. Based on the Project elements described and the analysis contained in the Draft EIR, the Project would generally support the applicable Walkability Checklist objectives and implement relevant strategies. As such, the Project would be consistent with relevant aspects of the Walkability Checklist.

# West Los Angeles Transportation Improvements and Mitigation Specific Plan ("WLA TIMP")

The WLA TIMP, adopted on March 8, 1997, contains provisions for the establishment of funds for specific transportation improvements resulting from transportation impacts generated by new development within the WLA TIMP area. The WLA TIMP requires that new development mitigate significant transportation impacts caused by development in the R3 and less-restrictive zones. In addition, the WLA TIMP regulates the phased development of land uses to the extent that the transportation infrastructure can accommodate such uses. Although the RE11 Zoning of the East Campus renders the

WLA TIMP not applicable to the Project, consistency with the WLA TIMP for informational purposes is discussed below.

Section 4.C of the WLA TIMP provides that Los Angeles Department of Transportation ("LADOT") shall calculate the number of projected peak-hour vehicle trips for all projects in the WLA TIMP area. A traffic assessment is required for projects that would generate 43 or more trips. As set forth in Draft EIR Table IV.J-3, the East Campus would generate 224 trips prior to mitigation. Consistent with the WLA TIMP, therefore, a traffic assessment was prepared for the Education Master Plan.

Section 4.E of the WLA TIMP provides that LADOT shall require that mitigation measures be undertaken to reduce any significant transportation impacts of a project to less than significant. If no feasible physical mitigation measures are available, LADOT may require reasonable measures to mitigate the adverse effects of such impacts. These mitigation measures may include TDM program measures. Consistent with the WLA TIMP, the Brentwood School currently implements a TDM program to reduce vehicle trips to and from the East Campus and West Campus and associated traffic congestion, as discussed in Draft EIR Section IV.J, Transportation and Circulation.

As part of the existing TDM program, the School limits the amount of inbound Schoolrelated vehicle trips to the East Campus during the AM peak period by implementing a carpooling and busing program. In addition, the School assigns parking permits to qualifying students (as space permits) to regulate the parking demand to the number of available student parking spaces. To qualify, student drivers must have passed their driving test and have their license in hand. Provisional drivers must have at least one East Campus sibling to be considered eligible; provisional drivers who do not have a sibling on the East Campus will not be able to apply for a permit until the one-year mark. Student drivers must drive at least two carpool passengers. Permission letters from carpool passengers are required, along with copies of the student driver's license, car insurance, and car registration.

As part of the Education Master Plan, the School would expand its existing busing and carpooling programs on the East Campus so that there would be no increase in traffic to and from the East Campus as a result of the increase of 265 students. The TDM program establishes proper access routes, carpooling rules, and hours assigned for drop-off and pickup. As such, the Education Master Plan would not cause LOS at any intersections within the Plan area to deteriorate to an LOS F, nor would it cause any intersections already operating at LOS F to further deteriorate. In compliance with the WLA TIMP, the Applicant has prepared a traffic study to analyze traffic impacts and has proposed mitigation to reduce these impacts. In addition, with the TDM program and provisions for additional parking space on the Campuses, the Education Master Plan would prevent the intrusion of vehicles into the surrounding residential neighborhoods.

The School also implements a traffic management program on the West Campus to promote carpooling and meet a minimum average vehicle ridership ("AVR") requirement

of 2.5. This AVR exceeds the highest-minimum AVR of 1.5 in the WLA TIMP. The School will continue to implement this program, including the minimum AVR target, under the Project.

Based on the foregoing, the Education Master Plan would be consistent with the WLA TIMP.

# Southern California Association of Governments' ("SCAG's") Regional Comprehensive Plan ("RCP")

SCAG's RCP addresses issues related to growth and land use with policies that support mobility and air quality goals, maintain the region's quality of life, and improve the standard of living. The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and reflect local plans and policies, are used by SCAG in all phases of implementation review. The Project would not exceed the growth parameters of the RCP. The Project does not propose the development of residential units. Therefore, the Project would not directly induce population growth in the area. Temporary construction jobs are highly specialized, and construction workers remain at a job site only for a particular phase of the construction process. Thus, the Project does not anticipate that construction workers would relocate their households' places of residence as a consequence of working on the Project.

Implementation of the Project would not result in an increase in the regional population. The Project would not result in the expansion of Campus boundaries. While the Project would result in a 265-student increase in overall enrollment, these additional students are expected to be drawn from the existing student population across the greater Los Angeles area. This increase consists of 26 new Brentwood School students to the Middle School (grades 6 through 8) on the East Campus and 175 new students to the Upper School (grades 9 through 12), also on the East Campus. The increase also includes an additional 64 students in grades K through 5 to replace the 6th grade students who would be relocated from the West Campus to the East Campus. The Project would include minor improvements to improve circulation near the School and would not indirectly induce population growth in the area. In addition to the improved facilities and the 265-student increase on the East Campus, there would be an increase in employment consisting of approximately 55 faculty and staff members and seven contract or part-time employees.

Should the Project result in families moving to the Los Angeles area for purposes of attending the Brentwood School, the maximum number of new households is conservatively estimated to be approximately 265, based on a rate of one student per household. (It is expected that the enrollment increase would mostly consist of existing students who already live in the area, given that the School currently draws from the greater Los Angeles area.) Also, conservatively assuming that the new employment opportunities would result in new households moving to the Los Angeles area, the result would be a demand for 62 residences at a rate of one per new employee. Any housing

needs associated with this increase in student enrollment and employment at the Brentwood School would be accommodated by existing vacancies in the housing stock and would not represent an increase in SCAG's 3,852,000 households forecast for year 2035 for the County of Los Angeles Subregion. Although marginal, the new employment opportunities could counteract any projected regional imbalance between population and employment opportunities.

Therefore, the Project is consistent with the SCAG's RCP, and impacts would be less than significant.

# SCAG's Regional Transportation Plan ("RTP")

SCAG's RTP is a long-term vision document that outlines transportation goals, objectives, and policies for the SCAG region, including Los Angeles County. The latest SCAG RTP, adopted in April 2012, includes an assessment of overall growth and economic trends in the region and provides strategic direction for transportation capital investments to support more efficient and sustainable modes of transportation from 2012 through 2035. Future planning would promote the use of bus and light rail transit, passenger high-speed rail, and other TDM strategies.

The RTP transportation goals are directed toward regional transportation planning. It is beyond the scope of individual projects to address the regional transportation issues raised in these policies. However, the Project is consistent with the overall objectives to minimize vehicle traffic. The Project site is located in an urbanized area served by existing public services and infrastructure. Both the East and West Campuses are adjacent to Sunset Boulevard, which is designated as a major highway within the Brentwood–Pacific Palisades Community Plan area. Two transit lines presently serve the Brentwood School. The Project would improve transit services and student busing to accommodate the increase in student enrollment, as well as to provide more options for students, faculty, and staff.

The Brentwood School currently implements a TDM program to reduce vehicle trips to and from the East Campus and associated traffic effects. Through the TDM program, the School limits the amount of School-related vehicle trips to the East Campus during the AM peak period by implementing a carpooling and busing program. In addition, the School assigns parking permits to qualifying students (as space permits) to regulate the parking demand, which also reduces the number of trips to the number of available student parking spaces. The TDM program would expand with the Education Master Plan to provide expanded busing and carpooling programs on the East Campus so that there would be no increase in traffic locally or regionally as a result of the increase in student enrollment.

The School also implements a traffic management program to promote carpooling and meet a minimum AVR of 2.5. The School will continue to implement this program, including the minimum AVR target under the Project.

Given that the Project would not increase growth beyond regional growth forecasts and long-range planning; would implement traffic reduction strategies, such as busing through its TDM program; would exceed sustainable design requirements; and would increase local employment opportunities for the existing population, the Project is consistent with SCAG's RTP. Impacts would be less than significant.

#### 3. Cumulative Impacts

Implementation of the Project, on its own, would not result in land use policy inconsistencies or incompatibilities; thus, no significant land use impacts are anticipated. Moreover, the Project would serve to implement the applicable policies contained in the land use planning documents governing development on the Campuses and in the Project area, including the Brentwood–Pacific Palisades Community Plan. The Project would increase the existing enrollment at the Brentwood School on the East Campus, but would not expand either of the Campuses beyond their present boundaries. Rather, the Project would implement the replacement of facilities that may become functionally obsolete or substandard to meet future academic, administrative, physical education and health, and student support needs.

As discussed in Draft EIR Section III, Environmental Setting and Related Projects, there are related development projects proposed for sites in the vicinity of the two Brentwood School Campuses. The Project, in combination with these related projects, would increase development in the Pacific Palisades–Brentwood Community Plan area. The Archer School for Girls Project is the related project closest to the East and West Campuses.

The Education Master Plan Project, when considered cumulatively with the Archer School for Girls Project, would result in the continuation of similar land uses surrounded by residential neighborhoods and commercial development, which would not significantly change the land use character of the area. In addition, the Archer School for Girls Project would be regulated under the Brentwood–Pacific Palisades Community Plan, which, as discussed under Draft EIR Section IV.H.D, Regulatory Setting, provides land use policies that would ensure a consistent character for the Brentwood community and the Sunset Boulevard corridor. Combined, the Project and the Archer School for Girls Project would not divide, disrupt, or isolate any other land uses in the Plan area. The other related projects (listed in Draft EIR Section III, Environmental Setting and Related Projects) involve mainly mixed uses with commercial, retail, office, and high-density housing within low- and mid-rise buildings in highly urbanized retail commercial areas to the south.

The potential incremental effect on land use and plan consistency would not be cumulatively considerable because each related project would be required to comply with the General Plan, respective community plans, and regional plans. Collectively, the related projects would not be inconsistent with long-term regional growth projections and regional transportation planning. For these reasons, implementation of the Project is not anticipated to result in a cumulatively considerable contribution to land use impacts.

#### H. Noise

## 1. Construction

## East Campus:

The maximum construction noise levels would occur during the most intense construction activities occurring nearest to the edges of the Campus. The maximum worst-case construction noise levels would represent the loudest construction noise but would occur for a relatively short duration (about one to two weeks) and only intermittently during the workday. Noise levels under the worst-case construction conditions were estimated based on the construction activities that would be located closest to the nearest residences and that would involve the use of the noisiest equipment. Because all construction equipment would not be operating at the exact same location at any given time, the distance to the nearby residences assumes an approximate average distance of several pieces of equipment operating simultaneously over a construction area. Furthermore, the reported one-hour Leq includes the attenuation of standard exhaust mufflers for all equipment and attenuation by a sound curtain in accordance with Project Design Feature PDF N-2 or through a break in line of sight due to intervening structures or landscaping.

#### Phase I

Phase I includes the construction of the Middle School Classroom and Parking Garage, the renovation of and addition to Temple Hall, and modifications to the Campus grounds. The Project includes two potential options for the Middle School Athletic Field. Either the Middle School Athletic Field would be replaced with a new athletic field of the same size above the new Parking Garage, or a larger regulation-size athletic field would be placed above the Parking Garage. The accommodation of a regulation-size athletic field would require the field to extend farther north and require construction of a retaining wall of up to 18 feet high at the slope along the northeast boundary of the field and a 6.5-foot-high retaining wall near the northwest boundary. These walls would be located downslope from the adjoining single-family homes along Layton Drive and would not be visible to these homes. The construction activities for the parking garage and retaining wall along the length of the Middle School Athletic Field would likely generate noise levels that off-Campus residences would experience. Construction would occur Monday through Saturday. For purposes of this analysis, the loudest noise-generating equipment from each construction phase was used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor.

The closest residence (Residence 1) is located immediately north of the Middle School Athletic Field (Layton Drive side of Campus) of this construction at a distance of approximately 65 feet from construction activity limits. All equipment would be mobile and would operate throughout the construction area at varying distances from the residence and at varying levels of operation. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple pieces of equipment could overlap to a residence.

The noise levels at the various distances from the construction activity are shown in Draft EIR Table IV.I-7, East Campus Phase I Middle School Classroom and Parking Garage Construction Noise Estimates. Construction equipment operates at its noisiest levels for certain percentages of time during operation. The excavator, grader, and loader would operate at different time percentages over the course of an hour. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 decibels A-weighting ("dB(A)").

As shown in Draft EIR Table IV.I-7, the nearest house (Residence 1) along the north side of the Middle School Athletic Field (Layton Drive side of Campus) would experience construction noise levels of 62.8 dB(A); which would represent a 2.6 dB(A) increase over the measured ambient weekday noise level of 60.2 dB(A). Other residences north of the Middle School Athletic Field along the Layton Drive side of Campus (Residence 2) would not experience an increase in noise. Residence 3 would experience a construction noise increase of 2.8 dB(A) over ambient weekday noise levels. Residence 4 northeast of the Middle School Athletic Field (Woodburn Drive side of Campus) would experience an increase in noise levels of 4.6 dB(A) and 1.6 dB(A) over ambient weekday and weekend levels, respectively. Residences across Sunset Boulevard (Residences 5 and 6) would not be expected to experience increases in noise that would exceed the ambient conditions predominantly influenced by the traffic on Sunset Boulevard. The exterior of Apartment No. 1 located across Barrington Place would not be expected to experience noise levels above ambient levels during construction. Apartment No. 2 would experience increases of 2.9 dB(A) and 3.1 dB(A) over ambient weekday and weekend levels, respectively. Construction noise would not exceed the thresholds of a 10 dB(A) increase over existing levels lasting more than one day or a 5 dB(A) increase over existing levels lasting more than 10 days in a three-month period at a noise-sensitive use. Therefore, construction noise impacts as a result of the construction of the Middle School Classroom and Parking Garage would be less than significant.

#### Phase II

Phase II includes the removal of the Academic Village, construction of the 12,000square-foot Northeast Classroom Building and the 35,000-square-foot Middle School Gymnasium, and interior renovations as needed on the East Campus. Construction would occur Monday through Saturday. For purposes of this analysis, the loudest noisegenerating equipment from each construction phase was used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor.

<u>Northeast Classroom Building</u>: The closest residence (Residence 7) is located north of the proposed Northeast Classroom Building at distance of approximately 50 feet from construction activity limits, and approximately 100 feet of the center of the Northeast Classroom construction area. Other nearby residences are located along the Layton Drive and Woodburn Drive side of Campus (Residences 8, 9, and 10) to the northeast. All equipment would operate throughout the construction area at varying distances from residences and at varying levels of operation.

As provided previously in Project Design Feature PDF N-2, construction of the Northeast Classroom Building would include the use of a sound curtain (which would result in a minimum 15 dB(A reduction). According to the data specification sheets obtained from the vendor, Environmental Noise Control, the sound curtains have a sound transmission classification ("STC") rating of 25. The STC-25 rated sound curtain can reduce noise levels from 15 to 22 dB(A) on the sides of the equipment where the wall is installed; noise barrier wall typically range from 16 to 32 feet in height. The analysis provided herein uses the conservative estimate of 15 dB(A). The estimated noise levels that would be experienced during construction of the Northeast Classroom Building at the closest residences are provided in Draft EIR Table IV.I-8, East Campus Phase II Northeast Classroom Building Construction Noise Estimates. The noise estimates take into account the attenuation from use of a sound curtain, intervening masonry buildings walls (such as Residence 7 shielding Residence 8), and landscaping along property boundaries. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Draft EIR Table IV.I-8, Residence 7 north of the Northeast Classroom Building (Layton Drive side of Campus) would experience a construction noise increase of approximately 1.9 dB(A) and 4.0 dB(A) over weekday and weekend ambient levels, respectively, during construction of the Northeast Classroom Building. Construction noise levels at other nearby residences along the Layton Drive and Woodburn Drive side of Campus (Residences 8, 9, and 10) would range between 41.1 dB(A) to 45.3 dB(A), which are below the weekday ambient level of 52.6 dB(A) and weekend ambient level of 50.5 dB(A).

Thus, construction noise would not exceed the thresholds of a 10 dB(A) increase over existing levels lasting more than one day or a 5 dB(A) increase over existing levels lasting more than 10 days in a three-month period at a noise-sensitive use. Therefore, temporary construction noise impacts to residences north of the Northeast Classroom Building (Layton Drive side of Campus) during construction of the Northeast Classroom Building would be less than significant.

<u>Middle School Gymnasium</u>: The new Middle School Gymnasium would include 35,000 square feet of physical education facilities, classrooms, and offices, and would

accommodate the School's maintenance and operations functions and central receiving. The existing 2,560-square-foot Academic Village will be removed to allow for the development of the new Middle School Gymnasium.

Middle School Gymnasium construction would occur after the Middle School Classroom Building and Parking Garage have been completed. These Phase 1 structures would obstruct much of the direct line of sight to the apartments located across the Barrington Place side of Campus. These intervening structures, along with elevation differences in the surrounding terrain, would provide noise attenuation of approximately 10 dB(A). However, for purposes of the analysis, construction of the Middle School Gymnasium is assumed to occur concurrently with the construction of the Northeast Classroom Building to represent worst-case conditions.

The closest residence (Residence 4) is located to the north of the Middle School Gymnasium construction at a distance of approximately 200 feet from demolition and construction activities. All equipment would be mobile and would operate throughout the construction area at varying distances from the residence and at varying levels of operation. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple pieces of equipment could overlap to a residence.

Noise levels at the various distances from demolition and construction activities are shown in Draft EIR Table IV.I-9, East Campus Phase II Middle School Gymnasium Construction Noise Estimates. The noise estimates take into account attenuation from a sound curtain and landscaping along the property boundaries. Construction equipment would operate at its noisiest levels for certain percentages of time during operation. All equipment would operate at different time percentages over the course of an hour. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Draft EIR Table IV.I-9, construction noise levels at nearby residences (Residences 1 through 4 and Apartments Nos. 1 and 2) would range between 45.3 dB(A) to 53.5 dB(A), below the weekday ambient levels of 60.2 dB(A) or 65.0 dB(A) and weekend ambient levels of 63.2 dB(A) or 64.8 dB(A).

Thus, construction noise would not exceed the thresholds of a 10 dB(A) increase over existing levels lasting more than one day or a 5 dB(A) increase over existing levels lasting more than 10 days in a three-month period at a noise-sensitive use. Therefore, construction noise impacts during construction of the Middle School Gymnasium would be less than significant.

#### Phase III

Phase III would include the construction of the 75,000-square-foot Upper School Gymnasium and additional modifications to the Campus grounds. Construction would occur Monday through Saturday. For purposes of the analysis, the loudest noise-generating equipment from each construction phase was used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor.

The closest residence (Residence 7) is located north of the proposed Upper School Gymnasium at distance of approximately 157 feet from construction activity limits. Other nearby residences include single-family homes along the Layton Drive and Woodburn Drive side of Campus (Residences 8, 9, and 10) to the northeast. All equipment would operate throughout the construction area at varying distances from the residence and at varying levels of operation. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple pieces of equipment could overlap to the residences.

Construction of the Upper School Gymnasium would occur after construction of the Northeast Classroom Building, which would provide a partial blocking of noise that could otherwise reach Residences 7 and 8. Also, Residence 7 would serve as an intervening structure to Residence 8, resulting in attenuation of noise by an average of 10 dB(A). In addition, a sound curtain would be installed along the common boundary between the construction and Residence 7 to provide a noise attenuation of at least 15 dB(A) at Residences 7, 8, and 9 along the Layton Drive and Woodburn Drive side of Campus.

The estimated noise levels that would be experienced at the nearest residences along the Layton Drive and Woodburn Drive side of Campus (Residences 7 through 10) during construction of the Upper School Gymnasium are provided in Draft EIR Table VI-10, East Campus Phase III Upper School Gymnasium Construction Noise Estimates. Construction equipment operates at its noisiest levels for certain percentages of time during operation. All equipment would operate at different timeframes over the course of any given hour. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Draft EIR Table IV.I-10, the residences along the Layton Drive side of Campus (the closest line of sight) could be subject to construction noise from the Upper School Gymnasium construction. Construction noise levels at the closest residence (Residence 7) would experience a construction noise increase of 1.2 dB(A) over ambient weekend levels. Other nearby residences (Residence 8) would not experience an increase in noise above ambient conditions. Residence 9 would experience construction noise increases of 0.8 dB(A) over ambient weekday levels and 2.9 dB(A) over ambient weekend levels. Residence 10 would experience construction noise increases of 2.3 dB(A) over ambient weekend levels. The

residences across the Barrington Place side of Campus (Apartment Nos. 1 and 2) would not be subjected to an increase in noise above ambient conditions.

Thus, construction noise would not exceed the thresholds of a 10 dB(A) increase over existing levels lasting more than one day or a 5 dB(A) increase over existing levels more than 10 days in a three-month period at a noise-sensitive use. Therefore, temporary construction noise impacts to residential units along the Layton Drive side of Campus during construction of the Upper School Gymnasium would be less than significant.

#### Phase IV

Phase IV at the East Campus includes demolition of the existing Middle School Gymnasium/Classroom Building, construction of the Upper School Arts Building, interior and exterior renovations of the Science/Library/Theater (SLT) Building, and related grounds improvements. Construction would occur Monday through Saturday.

Middle School Gymnasium Demolition: Phase IV includes the demolition of the 41,000square-foot Middle School Classroom and Gymnasium Building. The commercial buildings located along Barrington Place are the nearest land use that would experience construction noise from demolition of the Middle School Gymnasium. However, these commercial buildings are not considered sensitive to construction noise increases based on the L.A. CEQA Thresholds Guide. The nearest sensitive land use are the apartment buildings located across Barrington Place. Due to the substantial topographic differences in elevations between the Middle School Gymnasium (placed on the floor of the arroyo) and the apartment buildings (Apartment Nos. 1 and 2) and distance, as well as the noise-blocking effects of the Middle School Building and commercial buildings. Apartment Nos. 1 and 2 would not experience an appreciable increase in noise from construction. Noise levels at residences along the Layton Drive side and Sunset Boulevard side of Campus from demolition of the Middle School Gymnasium would not increase due to the distance from the construction noise source, as well as the noiseblocking effects of the Middle School Building and Parking Garage, the new Middle School Gymnasium, Northeast Classroom Building, Upper School Gymnasium, and currently existing buildings. Therefore, temporary construction noise impacts from demolition of the Middle School Gymnasium would be less than significant.

<u>Upper School Arts Building and SLT Building Renovations</u>: The Upper School Arts Building would be constructed on the area where the existing Middle School Gymnasium and Classroom Building currently sits, at the south corner of the Campus, on the side adjacent to the Barrington Place commercial area. The building would be a six-story, 60,000-square-foot building with a lower-level parking garage. In addition, the existing SLT Building would undergo interior and exterior renovations. Construction of the Upper School Arts Building and the SLT addition would occur after completion of the Northeast Classroom Building, Upper School Gymnasium, Middle School Gymnasium, and Middle School Classroom Building and parking garage, all of which would provide sound attenuation for residents along the Layton Drive and Sunset Boulevard sides of the Campus. The differences in terrain, i.e., the construction would occur at the floor of the arroyo shielded by the slopes on either side, would provide additional sound attenuation.

For purposes of the analysis, the loudest noise-generating equipment from each construction phase was used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor. The closest residences (Apartment Nos. 1 and 2) are located to the south of the Middle School Gymnasium and Classroom Building (across Barrington Place side of Campus) at a distance of approximately 295 feet and 225 feet, respectively. All equipment would operate throughout the construction area at varying distances from the residences and at varying levels of operation. Therefore, the noise levels at nearby residences were estimated from the Campus property line and accounted for noise from multiple pieces of equipment operating simultaneously.

The estimated noise levels that would be experienced at the adjacent sensitive receptors during construction of the Upper School Arts Building and SLT Addition are provided in Draft EIR Table IV.I-11, East Campus Phase IV Upper School Arts Building and SLT Renovations Construction Noise Estimates. For purposes of the analysis, construction of the Upper School Arts Building is assumed to occur concurrently with the SLT renovations to provide a more conservative analysis.

Construction equipment operates at its noisiest levels for certain percentages of time during operation. All equipment would operate at different time percentages over the course of an hour. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A). As shown in Table IV.I-11, the exterior of the apartment buildings (Apartment Nos. 1 and 2) located across Barrington Place would experience construction noise levels ranging from 19.0 dB(A) to 19.4 dB(A) below the ambient weekday noise levels and from 18.8 dB(A) to 19.2 dB(A) below ambient weekend noise levels. Similarly, residences along the Layton Drive side of Campus (Residences 1 through 4) and across Sunset Boulevard (Residences 5 and 6) would not experience an increase in noise that would exceed the ambient conditions predominantly influenced by the traffic on Sunset Boulevard.

# West Campus

Phase I

Phase I would include the construction of the Saltair Annex and the associated belowground parking garage. The Admissions Building; Science, Music, Art, and Community Room Buildings; the Child Care Building; and the Saltair Parking Lot would all be removed to accommodate the development of the Saltair Annex and Parking Garage. Construction would occur Monday through Saturday. For purposes of this analysis, the loudest noise-generating equipment from each construction phase was

used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor.

The closest sensitive uses (Church/School No. 1a and 1b) are located immediately to the east of the proposed Saltair Annex at a distance of approximately 110 feet and 115 feet, respectively. All equipment would be mobile and operate throughout the construction area at varying distances from the residences and at varying levels of operation. Therefore, to conservatively estimate the highest noise levels at nearby residences, the noise levels were estimated from the Campus property line and included noise from multiple pieces of equipment because equipment operations could overlap.

All heavy equipment would be equipped with mufflers, which provide a 2 dB(A) reduction in noise emission. In addition, a noise curtain that would provide at least 10 dB(A) attenuation would be installed between the construction and the residences to the north (Residences 1, 2, and 3) and the St. Martin of Tours Catholic Church and School to the east (Church/School 1a and Church/School 1b). The estimated noise levels that would be experienced at the adjacent sensitive receptors during construction of the Admissions Building are provided in Draft EIR Table IV.I-12, West Campus Phase I Saltair Annex and Parking Garage Construction Noise Estimates.

These noise estimates take into account attenuation from a sound curtain and landscaping buffers along property boundaries. Construction equipment operates at its noisiest levels for certain percentages of time during operation. The excavator, front-end loader, and grader, would operate at different timeframes over the course of any given hour, which is accounted for in the SoundPLAN model. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Draft EIR Table IV.I-12, construction noise levels at the nearby sensitive uses (Church/School 1a) to the east along Saltair Avenue would experience increase in construction noise of 1.7 dB(A) and 4.5 dB(A) over ambient weekday and weekend levels, respectively. Other sensitive uses along Saltair Avenue (Church/School 1b) would not experience an increase in noise. The nearest house (Residence 1) to the north along Bundy Drive would experience increase in construction noise of 2.3 dB(A) and 4.8 dB(A) over ambient weekday and weekend levels, respectively. Other nearby residences (Residences 2 and 3) along Bundy Drive would range from 47.7 dB(A) to 54.5 dB(A), below the weekday ambient noise levels of 58.1 dB(A) and the weekend ambient noise levels of 55.6. Noise from construction activities would be below ambient conditions due to the distance of construction activities to the residences and from attenuation by the noise curtain between the residences to the north (Residence 2 and 3) and the St. Martin of Tours Catholic Church and School to the east (Church/School 1b).

Sensitive receptors in the residential neighborhood to the west of the Campus, across Bundy Drive (Residences 4 through 10), the University Synagogue, located west of the Campus on Sunset Boulevard, and residential units south of Sunset Boulevard (Residences 11 through 16) would not experience appreciable construction noise. Noise would be buffered by distance and by the intervening existing Campus structures that will block noise toward the south.

Construction noise at neighboring properties would not reach a 10 dB(A) increase over existing levels lasting more than one day or more than a 5 dB(A) increase over existing levels lasting more than 10 days in a three-month period. Therefore, noise impacts due to construction of the Saltair Annex and parking garage would be less than significant.

#### Phase II

No new improvements are planned for the West Campus during Phase II.

## Phase III

Phase III includes construction of the 8,000-square-foot Admissions Building and a 24,500-square-foot New Classroom Building, with a 14,500-square-foot parking garage below the New Classroom Building, removal of obsolete buildings and facilities, and improvements to the Campus grounds, circulation, and parking. Construction would occur Monday through Saturday. For purposes of this analysis, the loudest noise-generating equipment from each construction phase was used to represent worst-case conditions. The equipment includes a concrete/industrial saw, an excavator, a crane, a roller, and an air compressor.

<u>Admissions Building</u>: The closest residences (Residences 5 through 9) are located west of the proposed Admissions Building along Bundy Drive at a distance of approximately 130 feet from construction activity limits. Other nearby residences include Residence 4 along Bundy Drive at distance approximately 150 feet, and across Sunset Boulevard with direct line of sight to the Admission Building (Residences 4 through 10). All equipment would operate throughout the construction area at varying distances from the residence and at varying levels of operation. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple pieces of equipment could overlap to a residence.

As provided in Project Design Feature PDF N-2, construction of the Admissions Building would include the use of a sound curtain (which would result in a minimum 15 dB[A] reduction). The estimated noise levels that would be experienced at the adjacent residences across Bundy Drive (Residences 4 through 10) and across Sunset Boulevard (Residences 11 through 16) are provided in Draft EIR Table IV.I-13, West Campus Phase III Admissions Building Construction Noise Estimates. Construction equipment operates at its noisiest levels for certain percentages of time during operation. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Draft EIR Table IV.I-13, construction noise levels at residences west of the West Campus along Bundy Drive (Residences 4 through 9) would range from 44.4 dB(A) to 60.2 dB(A), below the weekday ambient noise levels of 62.2 dB(A) and weekend ambient noise levels of 60.6 dB(A). Other residences along Bundy Drive (Residence 10) would experience construction noise increase of 2.4 dB(A) over ambient weekend levels and 0.8 above weekday levels. Construction noise levels at residences across Sunset Boulevard with direct lines of sight to the Admission Building construction (Residences 11 through 16) would range from 63.6 dB(A) to 72.0 dB(A), below the weekday ambient noise levels of 74.7 dB(A) and weekend ambient noise levels of 74.2 dB(A). Thus, residences would not experience an appreciable increase in noise from construction activities above ambient conditions.

Residences north of the Admissions Building would not experience any appreciable increase in construction noise due to greater distances, noise-blocking effects by the first row of residential structures, vegetation, and the existing Arts and Athletic Building.

The St. Martin of Tours Catholic Church and School (Church/School 1/a and 1/b), located approximately 400 feet to the west across Saltair Avenue, would also not experience increases in ambient conditions from construction activities due to the distance, elevation differences, and attenuation from the intervening Saltair Annex.

Construction noise would not exceed the threshold of a 10 dB(A) increase over existing levels lasting more than one day or a 5 dB(A) increase over existing levels lasting more than 10 days in a three-month period at a noise-sensitive use. Therefore, construction noise impacts during construction of the Admissions Building would be less than significant.

<u>New Classroom Building</u>: The closest residence (Residence 7) is located immediately west of the proposed Classroom Building (Bundy Drive side of Campus) at a distance of approximately 110 feet. All equipment would be mobile and operate throughout the construction area at varying distances from the residence and at varying levels of operation. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple pieces of equipment could overlap to a residence.

As provided previously in Project Design Feature PDF N-2, construction of the New Classroom Building would include the use of a sound curtain (which would result in a minimum 15 dB[A] reduction). The estimated noise levels that would be experienced at the adjacent sensitive receptors during construction of the New Classroom Building are provided in Draft EIR Table IV.I-14, West Campus Phase III New Classroom Building Construction Noise Estimates. Construction equipment operates at its nosiest levels for certain percentages of time during operation. All equipment would operate at different time percentages over the course of an hour. Standard exhaust mufflers for all equipment and the break in line of sight to a house or apartment would reduce construction noise levels approximately 7 dB(A).

As shown in Table IV.I-14, construction noise levels at residences west of the West Campus along Bundy Drive (Residences 4 through 10) would range from 57.2 dB(A) to 60.5 dB(A), below the weekday ambient noise levels of 62.2 dB(A) and weekend ambient noise levels of 60.6 dB(A).

Construction noise would not exceed the thresholds of a 10 dB(A) increase over existing levels lasting more than 1 day or a 5 dB(A) increase over existing levels lasting more than 10 days in a 3-month period at a noise-sensitive use. Therefore, temporary construction noise impacts from the New Classroom Building would be less than significant.

#### Phase IV

No new improvements are planned for the West Campus during Phase IV.

2. Construction Traffic

Construction traffic would generate noise along access routes to each Campus. The major pieces of heavy equipment would be moved onto each Campus once during the respective construction phase and for each specialized construction activity (i.e., demolition, grading, etc.). All staging would occur on-site at each Campus, and, thus, there would be no queuing of construction traffic on public streets.

Workers for the West Campus construction would be transported via shuttle bus from the East Campus. Overall, the daily transportation of construction workers via a shuttle bus and the hauling of materials both on and off the Project site are expected to cause increases in noise levels along study area roadways.

The proposed haul route for the East Campus and construction worker routes for both Campuses would include Bonsall Avenue through the adjacent VA property, which would be accessed via Sepulveda Boulevard or Wilshire Boulevard to the east of the Campus. If for some reason this route is not available, outbound vehicles would exit the Project site onto Barrington Place, proceed east on Sunset Boulevard to the I-405. In each case, inbound vehicles would use the reverse route.

Along Bonsall Avenue, through the VA hospital area, the lowest ambient hourly Leq, which would occur on weekends, would be 57 dB(A). The estimated noise level due to construction worker trips and East Campus construction haul trucks along Bonsall would be 56 dB(A), which is less than ambient conditions. In the event access from Bonsall is not available, construction trucks would access the East Campus using Sunset Boulevard traveling to and from the I-405. The lowest hourly ambient Leq would occur on the weekend and would exceed 68 dB(A) due to existing traffic and proximity to the I-405. As such, haul trucks would not exceed the ambient noise conditions along Sunset Boulevard.

There are two alternative haul routes proposed for the West Campus. Under the first, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed east on Sunset Boulevard to the I-405. Under the second, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed west on Sunset Boulevard and proceed south on Kenter Avenue to Bundy Drive to San Vicente Boulevard to Wilshire Boulevard to the I-405. In each case, inbound trucks would use the reverse route. This alternative haul route would be used as needed to avoid potential conflicts with the Archer Forward project (Related Project No.11) or other construction-related activity on Sunset Boulevard. The lowest hourly Leq would occur on the weekend and would be 68 dB(A) along Sunset Boulevard due to the existing traffic, residential uses, and its proximity to the I-405. The estimated noise level due to the shuttle bus trips and construction hauling along these routes would be 56 dB(A), which is less than the ambient conditions.

With regard to the second route, the estimated hourly ambient noise level, based on measurements, along Kenter Avenue and Bundy Drive would be 70.0 dB(A). The estimated hourly Leq, based on measurements, along San Vicente Boulevard would be 70.9 dB(A). The estimated noise created by construction worker shuttle bus trips and haul truck trips that use this route would be approximately 56 dB(A), which would be well below the measured ambient conditions. Therefore, potential construction worker and haul route traffic noise impacts would be less than significant.

3. Operational Noise

# East Campus

School Activity Noise: Sources of noise emanate from the Campus within the open gathering and walkway areas during breaks between classes and during lunchtime, during outdoor assemblies and athletic or performance events, and from the surface parking areas. These activities would continue in the same manner in future operating years. Outdoor athletic events are also scheduled on weekdays and weekends and occur during the daylight hours. Indoor athletic events, such as basketball or volleyball within the gymnasium, are periodically scheduled for evening hours and may occur on both weekdays and weekends. While there would be a phased increase of 265 students, these students would participate in the same general activities that occur under existing conditions at relatively the same frequency and attendance. Off-site sound levels that would potentially affect the residences would be regulated. Limits include the use of amplified speakers outdoors provided that the speakers are not oriented directly toward a residence; and when within 100 feet of a residence, the noise levels may not exceed 5 dB(A) greater than ambient measurements. Other limits include ending times for special events, such as no later than 10:00 P.M. Sunday through Thursday and 12:30 A.M. (30 minutes after midnight) Friday and Saturday.

The Project includes the development of an athletic field on the East Campus above the Middle School Classroom Building and Parking Garage. While the increase in students

on the East Campus is not anticipated to increase the frequency of events that have the potential to produce noise (e.g., athletic events), it is possible that the number of students and other spectators at such events could increase incrementally. Noise typically associated with recreational activities on athletic fields includes the voices of adults and children, and group recreation activities such as soccer and football. During periods when students and spectators are using exterior areas, noise levels can exceed 60 to 65 dB(A) Leq at 100 feet for non-amplified sound. Noise sources commonly associated with these events include use of loudspeakers and elevated voices from crowds and cheering. These noise levels are included within the SoundPLAN modeling and are reflected in the Project noise impacts. Noise level typically associated with recreational events from spectators and players can reach an occasional peak of approximately 75 dB(A) at 100 feet. Athletic field noise levels are usually highly random in distribution and frequency. Athletic activities currently occur on the Middle School field, although they are not well-attended. Therefore, noise due to these types of activities is already occurring within this area.

Under the regulation-size field option, the field could accommodate an Upper School event, which may be better attended. The existing hourly Leqs in the area of the proposed new Middle School Athletic Field nearest receptor (R1) are between 61 and 67 dB(A). While peak noise levels would be noticeable, the overall estimated Leq of 60 dB(A) would not be greater than 5 dB(A) over the ambient noise level as measured at receptor areas (R1). Overall, athletic event noise levels would be substantially masked by existing high traffic noise levels along Sunset Boulevard. In the existing VA athletic field areas, it would take a doubling in the number of spectators at events to increase noise levels by 3 dB(A), which is the threshold of human perception. As the crowd size increases, the average sound power level would increase logarithmically. This relationship generally holds for the guasi-steady or constant murmur component of crowd noise and also for events that occur in unison, such as cheering at a football game. The Project would increase enrollment on the East Campus by 265 students to a maximum of 960 students or an increase of 38 percent. Assuming a proportionate increase in spectators at sporting events, the increase in enrollment would not result in a doubling of spectators and, thus, would result in a less than 5 dB(A) increase over ambient Leq noise levels. Therefore, the increase in attendance at such events would result in only a marginal increase in noise. Impacts would be less than significant.

The Project would replace all surface parking with parking garages in more centralized locations of the Campus under the Middle School Athletic Field and the Upper School Arts Building. Potential sources of noise within parking garage would include cars accelerating and braking, doors closing, car alarms, car stereos, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Typically, noise associated with below-grade parking garages (e.g., car movements, horns, and alarms) is contained within the structure, and, thus, noise levels from below-grade parking structures are effectively shielded. The new parking structures would be enclosed on all sides with concrete walls that would block noise. With these design characteristics, noise generated within the new parking structures

would not be significant, and likely not audible, at the existing homes located north of the school or by other noise-sensitive uses in the area.

<u>Mechanical Equipment Noise</u>: A stationary source of noise would include mechanical equipment, such as heating ventilation and air conditioning ("HVAC") equipment. The Project would include rooftop HVAC units and exhaust fans that would be installed on the new buildings and in parking areas. HVAC units typically generate noise levels of 60 dB(A) equivalent sound level ("Leq") at 50 feet when unshielded.

Pursuant to Section 112.02 of the LAMC, mechanical equipment would be shielded and located behind parapets on roof tops such that the ambient noise level on the surrounding residences does not exceed ambient noise level by more than 5 dB(A). Thus, the on-site HVAC equipment would not experience noise increases above ambient conditions. As such, noise impacts to off-site residential uses from the operation of mechanical equipment on the Project site would be less than significant.

Vehicle Noise: Based on the distribution of traffic volumes, noise modeling was conducted for the roadways analyzed in the Draft EIR Appendix IV.J, Transportation Studv. The increase in traffic resulting from implementation of the Project would increase the ambient noise levels at sensitive off-site locations in the Project vicinity. Roadway noise levels were forecasted to determine if the Project's vehicular traffic would result in a significant impact at off-site noise-sensitive receptor locations. As discussed in the Transportation Study, a ride-sharing program would be developed to offset any potential increased peak-hour vehicle trips to the East Campus. The ridesharing program would result in no new peak-hour East Campus trips. However, the Project would increase non-peak-hour vehicle trips by approximately 195 trips as a result of the increased enrollment of 265 students and related staffing. This increase in vehicle trips includes increased bus trips resulting from the Project. The roadway noise was estimated using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), which calculates the community noise equivalent level ("CNEL") noise level for a particular reference set of input conditions based on site-specific traffic volumes, distances, speeds, and noise barriers. The results of the modeled weekday roadway noise levels at 75 feet from the roadway centerline are provided in Draft EIR Table IV.I-16, East Campus Existing with and without Project Roadway Noise Levels. As shown in the table, noise levels would remain similar along Sunset Boulevard north of Barrington Place, increase by 0.1 dB(A) along Sunset Boulevard south of Barrington Place, and increase by 0.7 dB(A)along Barrington Place. Therefore, Project traffic volumes during non-peak hours would increase noise levels less than 3 dB(A) above existing roadway noise levels.

The entrance and exit driveways to the parking garage would be located along Barrington Place, on the opposite side of the Middle School Athletic Field from the single-family homes to the north. Therefore, noise levels generated by vehicles entering and exiting the garage would be shielded from the homes to the north by the new Middle School Classroom Building. Apartments along Barrington Place include balconies that may potentially be affected by traffic entering and exiting the Campus. However, the entrance and exit driveways would be located further from the apartments than the existing locations. Moreover, the additional non-peak-hour trips would not result in a 3 dB(A) increase or greater in roadway noise. Therefore, noise levels from entrance and exit driveways would be lower than existing noise levels.

Off-site locations in the Project vicinity would experience a marginal increase in noise resulting from the additional traffic generated by the Project. These levels would not exceed the 3 dB(A) and 5 dB(A) CNEL thresholds established under the L.A. CEQA Thresholds Guide. As discussed previously, an increase in CNEL of 3 dB(A) represents the point at which individuals notice a change in noise levels. In addition, the other roadway segments that are located even farther away from the Project site would experience less traffic increases due to the Project. Therefore, operational impacts from traffic noise would be less than significant.

## Composite Noise:

#### Phase I

Phase I would include the occupancy and use of the four-story, 85,000-square-foot Middle School Classroom Building, which would include an approximately 375-seat auditorium (including scene/costume shop, dressing rooms, and storage); a library (including support spaces); a dining hall and associated kitchen (including storage space); classrooms; science labs; visual art studios; administration and faculty offices; and open/recreational spaces. As described in Draft EIR Section III, Environmental Setting and Related Projects, the School holds evening events under the existing conditions. Most of the evening events that attract visitors (e.g., start after 7:00 P.M.); and, as such, do not generate peak hour traffic in the local area. Under the Project, the number of events will not increase and the total number of guests at any one event would increase only incrementally, if at all. Any incremental increase in attendees or students participating in the events would be nominal and would not cause an appreciable change to the noise levels currently experienced during these times. With regard to or related to any traffic noise increase, the traffic noise analysis described above includes portions of traffic for events occurring outside peak traffic hours. In addition, under the Project, parking would be accommodated within an enclosed garage, and spectators would access the auditorium via an enclosed pedestrian connection. This minimizes the chances for outdoor congregating that could create noise. Furthermore, the auditorium will be fully enclosed, so sound from the auditorium would not be audible from any residences in the vicinity.

A paved and landscaped forecourt facing onto Barrington Place would be created to provide a new front entrance to the Project site that would accommodate part of the onsite queuing vehicles, as well as provide a pedestrian entry from Barrington Place. A new 210-space, single-level parking garage would be constructed beneath the existing grade. Noise associated with parking facilities include car movements, activation of car alarms, sounding of car horns, slamming of car doors, tire squeals, etc. Typical noise associated with below-grade parking garages is contained within the structure; thus, noise levels from below-grade parking structure are effectively shielded.

A portion of the roof deck of the new Parking Garage would be covered in turf to replace the existing Middle School Athletic Field. Potential noise impacts associated with the Middle School Athletic Field include outdoor athletic activities with spectators, along with outdoor school functions. There would be no bleachers installed, the number of spectators would not materially increase as a result of the Project, and spectators would continue to be predominantly limited the areas immediately surrounding the sidelines of the field. As provided previously in Project Design Feature PDF N-3, loudspeakers and other sound amplification would not be oriented toward any off-site residences.

The closest residence (Residence 1) is located approximately 65 feet north of the Middle School Athletic Field (Layton Drive side of Campus).

The estimated noise levels that would be experienced during operation of the Middle School Classroom Building and Parking Garage, Middle School Athletic Field, and forecourt at the closest residences are provided in Draft EIR Table IV.I-17, East Campus Phase I Middle School Classroom and Parking Garage Operational Noise Estimates.

As shown in Draft EIR Table IV.I-17, operational noise levels at nearby residences (Residences 1 through 6) would range between 53.7 dB(A) to 68.9 dB(A), which is below the estimated ambient levels of between 60.2 dB(A) and 72.1 dB(A) for weekdays, and below the estimated ambient noise levels of between 63.2 dB(A) and 74.2 dB(A) during the weekend. Estimated operational noise levels would reach 66 dB(A), 1 dB(A) above ambient conditions, near the exterior of Apartment Building No. 1 located on the south side Barrington Place, directly opposite the School. This operational noise is attributed predominantly to operations of the Middle School Classroom Building and Parking Garage because they are closest to the apartment building location. However, the apartment building structure itself would likely attenuate any increase in noise level experienced in the interior of the building, and there are no outdoor living spaces (such as balconies or yards) at these apartments facing the School's operations along Barrington Place. Furthermore, operational noise increases would not be greater than 5 dB(A) over the existing noise levels. At the exterior of Apartment Building No. 2, located adjacent to Apartment Building No. 1 along Barrington Place, estimated operational noise would be below the ambient weekday and weekend noise levels of 65.0 dB(A) and 64.8 dB(A), respectively. As such, there would be no appreciable increase in noise experienced at Apartment Building No. 2. Therefore, operational noise impacts from use of the Middle School Classroom and Parking Garage would be less than significant.

Phase II

<u>Northeast Classroom Building</u>: Phase II would include the occupancy and use of the 12,000-square-foot Northeast Classroom Building consisting of classrooms and faculty offices and a 3,600-square-foot landscaped quad area. The loudest noise source to the closest residence (Residence 7) on any given day during this phase includes the baseball field located on the VA property to the south of the residences and from the Northeast Classroom Building (e.g. noise from students and staff during passing periods between classes, school bells, public service announcements). Other noise sources include circulation, parking, pedestrian circulation, and athletic and open spaces uses that would not change from what would be completed under Phase I. The estimated noise levels that would be experienced during operation of the Northeast Classroom Building at the closest residences are provided in Draft EIR Table IV.I-18, East Campus Phase II Northeast Classroom Building Operation Noise Estimates.

As shown in Draft EIR Table IV.I-18, operational noise levels from the Project at residences along the Layton Drive and Woodburn Drive side of the East Campus (Residences 7 through 10) would range between 44.5 dB(A) and 50.1 dB(A), which is below the weekday ambient level of 52.6 dB(A) and the weekend ambient level of 50.5 dB(A). Therefore, noise impacts from use of the Northeast Classroom Building would be less than significant.

<u>Middle School Gymnasium</u>: Phase II would include the occupancy and use of the 35,000-square-foot Middle School Gymnasium, which would accommodate physical and education facilities, classrooms, and offices. Other noise sources include circulation, parking, pedestrian circulation, and athletic and open spaces uses that would not change from what would be completed under Phase I and operation of the Northeast Classroom Building. The estimated noise levels that would be experienced during operation of the Middle School Gymnasium at the closest residences are provided in Draft EIR Table IV.I-19, East Campus Phase II Middle School Gymnasium Operation Noise Estimates.

As indicated in Draft EIR Table IV.I-19, Project operational noise levels at nearby residences (Residences 1 through 4, and 7) are estimated to range between 54.6 dB(A) and 59.4 dB(A), which is below the weekday ambient levels, which are estimated to range between 52.6 dB(A) and 60.2 dB(A). The operational noise is also below the estimated weekend ambient noise levels, which range between 50.5 dB(A) and 63.2 dB(A). Noise at the exterior of the apartment buildings (Apartment No. 1 and No. 2) located across Barrington Place is estimated to increase between 1.0 dB(A) and 2.1 dB(A) above ambient weekday levels and between 1.2 dB(A) and 2.3 dB(A) above ambient weekend levels. However, operational noise levels at the off-site residences would not increase by more than 5 dB(A) over existing levels. Therefore, noise impacts from use of the Middle School Gymnasium would be less than significant.

Phase III

Phase III would include the occupancy and use of the 75,000-square-foot Upper School Gymnasium, which would accommodate classrooms; a gymnasium; boys' and girls' locker rooms; fitness, exercise, and weight-rooms; a wrestling/fencing studio; team rooms; and faculty offices. The site of the existing Senior Parking Lot would be reconfigured with pavement and mature landscaping to create a second drop-off pickup forecourt that would accommodate vehicles from the existing Chayote Street/Barrington Place "Village" Gate. Vehicle circulation, parking, pedestrian circulation, and athletic and open space uses would not change from what would be completed under Phase I and II.

The loudest noise source to the closest residences along the Layton Drive and Woodburn Drive side of Campus (Residences 7 through 10) to the northeast on any given day during this phase includes the baseball field located on the VA property to the south of the residences. The estimated noise levels that would be experienced at the nearest residences along the Layton Drive and Woodburn Drive side of Campus (Residences 7 through 10) and apartment buildings along Barrington Place (Apartment Nos. 1 and 2) during operation of the Upper School Gymnasium are provided in Draft EIR Table IV.I-20, East Campus Phase III Upper School Gymnasium Operation Noise Estimates.

As shown in Draft EIR Table IV.I-20, Residence 10 along Woodburn Drive side of Campus would experience a noise level increase of 2.0 dB(A) and 4.1 dB(A) over ambient weekday and weekend levels, respectively. Residence 10 would experience a noise-level increase lower than 5 dB(A) over existing levels. Noise levels at Residences 7 through 9 would range from 43.9 dB(A) to 49.8 dB(A), below the ambient weekday levels of 52.6 dB(A) and the ambient weekend levels of 50.5 dB(A). Noise at the exterior of the apartment buildings (Apartment Nos. 1 and 2) located across Barrington Place would increase above the ambient weekday noise and weekend noise levels. The increases would range between 2.0 dB(A) and 2.2 dB(A) for weekdays and weekends, respectively, at Apartment Building No. 1; and between 0.8 dB(A) and 1.0 dB(A) for weekdays and weekends, respectively, at Apartment Building No. 2. However, since these operational noise increases would not exceed 5 dB(A) over existing levels, operational noise impacts from use of the Upper School Gymnasium would be less than significant.

#### Phase IV

Phase IV would include the occupancy and use of the 60,000-square-foot Upper School Arts Building, which would accommodate an approximately 350-seat theater, a black box theater, rehearsal space, music classrooms, practice and rehearsal rooms, a dance studio, and a visual arts studio. The Upper School Arts Building would sit over a new, single-level parking garage that would accommodate 82 parking spaces and connect to the 223-space parking garage beneath and adjacent to the Middle School Classroom Building. The Upper School Arts Building would be accessed via the secondary entrance at Chayote Street and Barrington Place.

Noise associated with below-grade parking garages would be contained within the structure, and, thus, noise levels, from below-grade parking structures would be shielded and result in negligible increases in ambient noise levels. Other noise sources, including activities generated from the Upper School Arts Building, such as vehicular circulation, outdoor parking, pedestrian circulation, and use of athletic and open space uses, would not materially change from what would occur under Phases I through III. Under the Project, the number of activities and events will not increase and the total number of quests at any one event would increase only incrementally, if at all. Any incremental nominal increase in attendees or students participating in the events would be nominal and would not cause an appreciable change to the noise levels currently experienced during these times. Pedestrians, such as students and visitors to the Campus, currently use the School's pedestrian pathways and access routes prior to and after interscholastic athletic activities or school functions, similar to those that will occur within the Upper School Arts Building. Moreover, there will be convenient parking located beneath the Upper School Arts Building, so that spectators can directly access the theater without needing to go outside. This minimizes the chances for outdoor congregating that could create noise. Furthermore, the theater will be fully enclosed, so sound from the auditorium would not be audible from any residences in the vicinity.

Most of the evening activities and events that attract visitors, e.g., start after 7:00 P.M.; and, as such, do not generate peak hour traffic in the local area. The traffic noise analysis described above includes portions of traffic for events occurring outside peak traffic hours, and concludes that impacts due to roadway noise would be less than significant.

Pedestrian noise from the increase in students would be limited to the on-site walkways and would be limited to talking and footsteps. As the walkways run between buildings, the buildings provide buffering and noise would be consistent with existing conditions. There would not be an appreciable increase in noise levels as experienced from off-site receptors, and would conclusively not result in noise levels that exceed the 5 dB(A) Leq significance threshold at any of the off-site sensitive receptors. The estimated noise levels that would be experienced at the adjacent sensitive receptors upon completion of the Upper School Arts Building and SLT addition are provided in Draft EIR Table IV.I-21, East Campus Phase IV Upper School Arts Building and SLT Renovations Operation Noise Estimates.

As shown in Draft EIR Table IV.I-21, residences along the Layton Drive side of Campus (Residences 1 through 4) and across Sunset Boulevard (Residences 5 and 6) would not experience an increase in noise that would exceed the ambient weekday and weekend levels. The exterior of the apartment buildings (Apartment Nos. 1 and 2) located across Barrington Place would have an operational noise increase of 2.4 dB[A] and 0.7 dB[A], respectively, above the lowest ambient weekday noise levels. The exterior of Apartment Nos. 1 and 2 would also have an increase of 2.6 dB[A] an 0.9 dB[A], respectively, above the lowest ambient weekend noise levels.

increase would not be greater than 5 dB(A) over existing levels. Therefore, noise impacts from use of the Upper School Arts Building would be less than significant.

#### West Campus

<u>School Activity Noise</u>: Sources of noise emanate from the Campus within outdoor gathering and assembly areas and playgrounds during recess and lunch. These activities occur under existing conditions, and the Project would not increase the amount or intensity of these outdoor student activities and they would continue to be centrally located within the Campus grounds with surrounding buildings providing noise attenuation for off-site sensitive receptors.

The Project would replace the surface parking in the eastern portion of the Campus with a subsurface parking garage under the Saltair Annex, which would be connected to the subsurface parking garage under the Arts and Athletic Building. Subsurface parking would also be provided under the New Main Classroom Building. Potential sources of noise within the parking garage would include cars accelerating and braking, doors closing, car alarms, car stereos, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. The new parking structures would be enclosed on all sides. Typically, noise associated with enclosed parking garages (e.g., car movements, horns, and alarms) is contained within the structure; thus, noise from the subsurface parking garage would be effectively shielded. By replacing surface parking with enclosed parking, overall noise would marginally decrease. Therefore, with these characteristics, the parking lot noise would not increase, and impacts would be less than significant.

<u>Vehicle Noise</u>: The Project would remove on-campus surface parking near Saltair Avenue, and vehicle traffic that currently accesses the Campus from Saltair Avenue would be redirected to enter the subsurface parking garage from Bundy Drive. The Bundy Drive driveway is the main entrance where most Campus traffic currently accesses the Campus. The increase in vehicle traffic entering from Bundy Drive due to the removal of parking would not result in an increase in noise that would be perceptible to residences in the neighborhood south of the Campus. The results of the modeled weekday roadway noise levels at 75 feet from the roadway centerline are provided in Draft EIR Table IV.I-22, West Campus Existing with and without Project Roadway Noise Levels.

Because enrollment on the West Campus will remain unchanged, the Project would not increase operational traffic volumes on the surrounding roadways; therefore, there would be no increase in noise, and impacts would be less than significant.

<u>Mechanical Equipment Noise</u>: The Project would include rooftop HVAC units and exhaust fans that would be installed on the new buildings and in parking areas. The mechanical equipment would comply with the regulations under 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. Thus, the on-site equipment would be designed to contain noise shielding and would be located behind parapets on rooftops to reduce noise levels that would affect nearby noise-sensitive uses. Therefore, the single-family residences to the north, west, and south and the St. Martin of Tours Catholic Church and School across from Saltair Avenue to the north would not experience noise increases in appreciable levels above ambient conditions, nor increased noise to unacceptable levels of 70 dB(A) at adjacent residential and church uses. As such, noise impacts to off-site sensitive uses from the operation of mechanical equipment would be less than significant.

<u>Phase I</u>: Phase I would include the occupancy and use of the 28,500-square-foot Saltair Annex, which would accommodate an indoor activity room; classrooms and support spaces for kindergarten science, music, and art; and a new employee childcare center. The building would sit over a single-level 21-space parking garage that would connect to the existing parking garage located under the Art and Athletics Center. Typical noise associated with the below-ground parking garage would be contained within the structure; thus, noise levels from below-grade parking structures would be minimal. Pedestrian circulation on the West Campus would remain essentially unchanged, with only minor reconfigurations of walkways and congregation areas surrounding the Central Lawn Area.

The closest sensitive uses (Church/School Nos. 1a and 1b) are located immediately to the east of the West Campus. The noise levels were estimated from the Campus property line from where the noise of multiple operational uses could overlap at the sensitive use. The estimated noise levels that would be experienced at the sensitive receptors during operation of the Saltair Annex and Parking Garage are provided in Draft EIR Table IV.I-23, West Campus Phase I Saltair Annex and Parking Operation Noise Estimates.

As shown in Draft EIR Table IV.I-23, the estimated operational noise levels at nearby residences to the north along Bundy Drive (Residences 1 through 3) would range between 52.1 dB(A) and 55.3 dB(A), which is below the weekday ambient levels of 58.1 dB(A) and weekend ambient levels of 55.6 dB(A). Estimated noise levels at the Church/School No. 1a location near the St. Martin Tours Catholic Church and School would not increase above estimated ambient conditions for weekdays or weekends. Estimated noise levels at the Church/School No. 1b location near the St. Martin Tours Catholic Church and School would not increase during weekdays, but would increase by 2.0 dB(A) above ambient weekend noise levels. However, the operations would not increase noise levels by greater than 5 dB(A) above ambient conditions. Therefore, potential operational noise impacts from the Saltair Annex and parking garage would be less than significant.

Phase II: No new improvements are planned for the West Campus during Phase II.

Phase III: Phase III would include the occupancy and use of the 8,000-square-foot Admissions Building and the 24,500-square-foot New Classroom Building. The Admissions Building would accommodate the Admissions and Service Learning administrative office and support spaces, a common room, and a small employee kitchen. The Admissions Building would include new retaining walls along the Sunset Boulevard and Bundy Drive property lines to provide a level surface for the Admissions Building and main lawn. The New Classroom Building would accommodate classrooms, a library, faculty and administrative offices, and support spaces. A 30-space, singlelevel below-ground parking garage would be constructed beneath the New Classroom Building. As provided previously in Project Design Feature PDF N-3, the use of loudspeakers and other sound amplification equipment on Campus property would not be oriented directly toward any off-site residence not owned by the School. Pedestrian circulation would remain unchanged, with only minor reconfigurations of walkways and congregation areas surrounding the Central Lawn area. Phase III would represent full project build-out for the West Campus.

The closest residences (Residences 5 through 9) are located west of the Admissions Building along Bundy Drive. The loudest operational use considered on any given day during this phase includes school-related activity from the Admissions Building and the main lawn area. Therefore, the noise levels were estimated from the Campus property line from where the noise of multiple operational uses could overlap to the residences. The estimated noise levels that would be experienced at the adjacent residences across Bundy Drive (Residences 4 through 10) and across Sunset Boulevard (Residences 11 through 16) are provided in Table IV.I 24, West Campus Phase III Admissions and New Classroom Building Operation Noise Estimates.

The closest residence (Residence 7) is located immediately west of the New Classroom Building (Bundy Drive side of Campus). The loudest operational use considered on any given day during this phase includes school related activity from the New Classroom Building, Admissions Building, and the main lawn area. Noise generated within the new parking structure below the New Classroom Building would not be significant because the parking structure would be enclosed and a negligible noise increase would occur. The estimated noise levels that would be experienced at the adjacent sensitive receptors during operation of the New Classroom Building are provided in Draft EIR Table IV.I-24.

As shown in Draft EIR Table IV.I-24, Residence 4 would experience the highest weekend noise-level increase of 0.3 dB(A). Operational noise levels at other nearby residences located west of the West Campus along Bundy Drive (Residences 5 through 10) would range between 50.0 dB(A) and 58.7 dB(A), below the ambient weekday levels of 62.2 dB(A) and the ambient weekend levels of 60.6 dB(A). Operational noise levels at residences along Sunset Boulevard (Residences 11 through 16) would range between 61.2 dB(A) and 64.7 dB(A), below the ambient weekday levels of 74.7 dB(A) and the ambient weekend levels of 74.2 dB(A). As indicated in Draft EIR Table IV.I-24, none of the nearby residences would experience operational noise impacts of more than a 5

dB(A) increase over existing levels. Therefore, noise impacts from use of the Admission and New Classroom Buildings would be less than significant.

### 4. Cumulative

### **Operational Noise**

<u>Stationary Sources:</u> Due to LAMC provisions that limit stationary-source noise from items such as rooftop mechanical equipment and emergency generators, stationary source noise levels would be less than significant at the property line for each related project. Moreover, due to distance, it is unlikely that noise from any related project would interact with operational noise from the Project to create a significant combined noise impact. As such, it is not anticipated that a significant cumulative increase in permanent ambient noise levels would occur; thus, the impact would be less than significant. Therefore, the Project's contribution to cumulative noise impacts would not be cumulatively considerable.

<u>Vehicle Noise</u>: The cumulative future noise conditions for the East Campus within 75 feet of the Sunset Boulevard and Barrington Place roadway segments are provided in Draft EIR Table IV.I-25, East Campus Future with and without Project Noise Levels (dB[A] CNEL) at 75 Feet from Roadway Centerline. The Future without Project scenario includes increases in traffic from the Archer School for Girls.

The Project would result in 195 new East Campus–related trips during the non-peak hours. However, as provided in Draft EIR Table IV.I-25, the Project would not contribute to a future increase in noise levels greater than 3 dB(A) along the affected roadway segments. Therefore, potential cumulative impacts from Project-generated increases in traffic will be less than significant.

The cumulative future noise conditions for the West Campus within 75 feet from the roadway centerline are provided in Draft EIR Table IV-26, West Campus Future with and without Project Noise Levels (dB[A] CNEL) at 75 feet from Roadway Centerline. The Future without Project scenario includes increases in traffic from the Archer School for Girls.

As provided in Draft EIR Table IV.I-26, the Project would not contribute to future increase in noise levels greater than 3 dB(A) along the affected roadway segments at the West Campus. Therefore, potential cumulative impacts from Project increases in traffic are considered less than significant.

5. Project Design Features:

The City finds that Project Design Features N-1 to N-3, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential noise impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

### I. Public Utilities

A. Water

#### 1. <u>Project Water Demand and Plan Consistency</u>:

Construction: Construction will require the use of water. The Project would involve the removal of approximately 72,541 square feet of existing facilities (43,660 square feet from the East Campus and 28,881 square feet from the West Campus). Temporary soil surface disturbance would occur in each respective construction phase to prepare the soil for building foundations and other surface improvements. This would expose soil to wind erosion and would require dust control. Throughout Project construction in each phase through 2040, water would be used during grading and earthwork primarily to reduce fugitive dust and to aid in earth compaction. Water consumption rates for construction-related activities are estimated to be approximately 0.89 af per acre. Collectively, the grading activity would occur on approximately five acres or less in total on the East Campus and two acres or less in total on the West Campus. Based on a rate of 0.89 acre feet ("af") of water per acre, construction watering would require a total of approximately 6.23 af of water over the course of the four construction phases. This represents a marginal amount of the estimated 725,000 af of water supply expected under worst case conditions in 2035 as provided in Draft EIR Table IV.K.1-1, Summary of Existing and Planned Water Supplies (in Acre-Feet). Assuming a worst case two-acre area of construction (Phase I on the East Campus), the maximum annual water use would be 1.78 af of water, which could occur in year 2016 when there would be an estimated 647,100 af of supplies. Furthermore, over the 25-year implementation timeframe of the Education Master Plan, the average annual construction water use would be 0.42 afy, which would not be significant, given the annual water supply projections that range between 627,000 afy at the low end and 725,000 afy on the high end. As discussed in Draft EIR Section IV.H, Land Use and Planning, SCAG's RCP addresses issues related to growth and land use with policies. The Urban Waste Management Plans ("UWMPs") prepared by the water purveyors, in this case LADWP, are updated approximately every five years and are designed for planning to meet water demands based on SCAG's projected growth. As provided in Draft EIR Section IV.H, Land Use and Planning, the Project is within the growth projections for the service area. The temporary water use for Project construction, will not exceed the projected future water demand for the area. Given that LADWP updates its UWMP every five years, as required by state law, to ensure it has adequate supply to accommodate the anticipated growth and water demand during construction, the impact of the demolition, site preparation, and construction phase of the Project on water services would be less than significant. In addition, water used for dust suppression is typically sprayed from water trucks, which can be filled with recycled water before being transported to the Campuses, thus further reducing the Project's demand for water during construction.

Construction of water pipelines to serve operations of the Project, as described in the Project Design Features, would be laterals and mains within both the East and West

Campuses. The construction would be limited to trenching and is included in the grading expected as a part of the Project.

### **Operations**:

### East Campus

On the East Campus, the Project includes three new buildings, two replacement buildings, and two renovated/expanded buildings over the course of the Education Master Plan. Two buildings would be removed to accommodate new or replacement facilities. There would be a net addition of approximately 244,300 square feet of school building space. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area.

As shown in Draft EIR Table IV.K.1-6, East Campus Operational Water Demand, operation of the East Campus would require approximately 5,586 gpd or 6.25 afy of water.

As provided in Draft EIR Section IV.A, Aesthetics and Visual Resources, the School would install landscape screening trees along the parking lot in the north boundary of the Campus near Layton Drive, along the slope north of the Middle School Athletic Field, and along the retaining wall for the regulation-size football field (should this option be constructed). While these trees would require some irrigation in the initial planting and establishment period, the trees would ultimately become sustainable without irrigation (within two years). The short-term demand for irrigation water to establish these trees would be marginal and would be off-set by the reduction in irrigation demands due to the reduction of natural turf grass upon replacement of the existing Middle School Athletic Field.

### West Campus

On the West Campus, the Project would largely improve existing facilities and play spaces and would create a separate area for kindergartners. It would include the construction of two new buildings and one replacement building over the course of the Education Master Plan. There would be a net addition of approximately 32,119 square feet of School building space. In addition, existing buildings would be renovated from time to time as needed, without any increase in floor area. Seven buildings would be removed to accommodate new or replacement facilities.

As shown in Draft EIR Table IV.K.1-7, West Campus Operational Water Demand, operation of the West Campus would require approximately 1,057 gpd or 1.19 afy of water.

Draft EIR Table IV.K.1-3 shows that with active and passive conservation, the City is expected to lower the total projected water demand compared to the total supply projection shown in Draft EIR Table IV.K.1-1. Furthermore, the supply assumes a worst-

case, multiple dry-year period, as opposed to average rainfall conditions. In addition, all water fixtures would comply with mandated efficiency standards, thereby minimizing potential demand. Based on these factors, implementation of the Project would not have the potential to result in significant impacts to water supplies.

The combined net total operational water demand of 6,643 gpd (7.44 afy) for both Campuses under the Education Master Plan would represent a negligible percentage (less than 0.024 percent) of the 32,712 afy that LADWP is planning to meet between the years 2015 and 2025. For longer-term planning, this represents a negligible percent of the projected water demand increase of 42,059 afy that LADWP projects and is planning to meet between 2015 and 2035. Although the Project would increase water demand with the increase of 265 students and the increase in admission office space and parking garages, this increase would be partially off-set by the reduction in water demand for areas that will no longer require irrigation water.

The Project is not one of the specified types of development requiring a Water Supply Assessment under Section 10912 of the Water Code, nor would it generate a water demand that would be equivalent or equal to a 500-dwelling-unit development. Water consumption for a 500-unit residential development project would be approximately 143,750 gpd, based upon the average consumption of 287.5 gpd of water per single-family unit for a typical three-bedroom home. Based on water use assumptions of 500 one-bedroom apartments, the demand would be 60,000 gpd (120 gpd per unit). Therefore, a Water Supply Assessment is not required.

# 2. <u>Consistency with Plans' Growth Forecasts</u>

As discussed in Draft EIR Section IV.H, Land Use and Planning, long-term operations of the Project would not result in a substantial increase in the regional population. While the Project would result in a 265-student increase in overall enrollment, these additional students would be drawn from the existing student population across the greater Los Angeles area. In addition to the improved facilities and the 265-student increase on the East Campus, there would be an increase in employment consisting of approximately 55 faculty and staff members and seven contract or part-time employees.

As the School draws from a wide area, it is not anticipated that families will move to the LADWP service area for purposes of their children attending the Brentwood School. However, should the Project result in any families moving to the LADWP service area for such purpose or because family members start working at the Brentwood School, the new households would be accommodated by existing vacancies in the housing stock. The Education Master Plan is also consistent with the growth forecasts for the City of Los Angeles Subregion (i.e., one of SCAG's subregions). To the extent families move into the LADWP service area as a result of the Project, such population increase would be included in forecasted population growth for 2035 in the City of Los Angeles

Subregion. The Project is, therefore, consistent with 2012 SCAG's forecast for the City of Los Angeles Subregion. The 2010 UWMP was developed based on demographic data by 2008 SCAG RTP, which is higher than the more recent 2012 RTP demographic projection. Therefore, the Project was accounted for in the estimated growth and related water demand projected in the 2010 UWMP. Since LADWP expects to have a reliable supply of water for the City in the next 25 years, implementation of the Project would not result in a significant impact to water supplies.

## 3. <u>Infrastructure Improvements</u>

The Project site is located in an urban area where adequate water infrastructure exists. The LADWP has determined that adequate infrastructure currently exists to serve the Brentwood School following Education Master Plan implementation.

Each phase of the Project would be required to meet the currently applicable minimum standards for on- and off-site domestic and fire-flow demands, as provided for in Project Design Feature PDF W-2. In addition, specific demand data and requirements would be determined prior to the issuance of certificates of occupancy through consultation with the Los Angeles Fire Department ("LAFD") and based on the applicable building code requirements in effect at the time of review of the final East Campus and West Campus development plans. Once the fire-flow demands for the relevant Project phase have been determined, the Applicant would request a Service Advisory Request ("SAR") from the LADWP. This SAR would determine whether the water pressure in the area is sufficient to meet the demand needed for fire suppression. If it is not, then the Applicant would be required, as part of the normal building permit process, to implement upgrades to the facilities or implement alternative measures that would meet the required pressure standards.

East Campus Infrastructure: As shown in Draft EIR Figure IV.K.1-1, East Campus Water Supply Plan, the proposed looping water system for domestic water and fire flow to accommodate the new buildings, as described in the Project Design Features, would occur within the existing East Campus property. No improvements to off-site water mains would be necessary for the East Campus under the Project, as daily water demand would not significantly increase. As provided in the Project Design Features, metered and automatic operation water devices would be implemented for all new and remodeled facilities on the Campus. All fixtures and equipment to remain would be retrofitted with water conserving control devices, fixtures, and trim. Existing Campus water use components not remodeled would be separately metered to integrate these uses in the overall monitoring and reporting mechanism. All new and existing landscape irrigation systems would be metered and monitored as well. These features would allow the School to minimize water demand.

Domestic water heating may utilize tankless water heaters with an energy management system interface to monitor their operation. Systems in close proximity to mechanical

cooling systems with heat recovery capability would be utilized to preheat domestic water for consumption at water fixtures.

<u>West Campus Infrastructure</u>: Although the West Campus would add net new administrative and parking space, no improvements to off-site water mains would be necessary for the West Campus under the Project, as daily water demand would not significantly increase. The School can reuse the existing water meters located on Bundy Drive and Saltair Avenue. The Bundy Drive meter can feed domestic water to the existing buildings along Bundy Drive and the new Admissions and New Classroom Buildings. The Saltair Avenue meter can service existing buildings along Saltair Avenue and the Saltair Annex.

The water pipeline improvements for the West Campus are shown in Draft EIR Figure IV.K.1-2, West Campus Water Supply Plan. As described within Project Design Feature PDF W-2, a new six-inch fire water line can create a loop by connecting to the existing eight-inch water lines (LADWP) in both Saltair Avenue and Bundy Drive. Fire water service can be provided to all buildings and on-site fire hydrants from this new system. An additional fire hydrant or fire department connections may be required at the northeast portion of the site. This requirement would be based on future design coordination with the LAFD during the normal building permit process.

As provided in the Project Design Features, metered and automatic operation water devices would be implemented for all new and remodeled facilities on the Campus. All fixtures and equipment to remain would be retrofitted with water conserving control devices, fixtures, and trim. Existing Campus water use components not remodeled would be separately metered to integrate these uses in the overall monitoring and reporting mechanism. All new and existing landscape irrigation systems would be metered and monitored, as well. These features would allow the School to minimize water demand.

# 4. Cumulative Impacts

Implementation of the Education Master Plan would result in a net increase in water demand of the existing Campus' operations. Estimated water demand of related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, is shown in Draft EIR Table IV.K.1-7, Water Demand of Related Projects. The development of related projects would result in a demand of approximately 237,577 gallons of water per day, or 266.12 afy. Together with the Project's net increase of 7.44 afy, cumulative demand would be 273.56 afy.

This estimated annual cumulative water demand would represent approximately 0.024 percent of the water demand for the City in 2025 during a worst-case multiple-dry year period. The Project would not exceed SCAG's 2008 or 2012 RTP growth projections, which are the basis for estimated water demand accounted for the LADWP 2010 UWMP for current and projected water demand and available water. Based on the service area reliability assessment conducted by the LADWP in its 2010 UWMP, the LADWP

determined that it would be able to reliably provide water to its customers through the year 2035. Therefore, it is anticipated that the LADWP would be able to supply the demands of the Project, related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, and all new development within the LADWP service area for the foreseeable future. In addition, a "Will-Serve" letter, from the LADWP would be obtained prior to each phase of construction. With the incremental increase in water demand (7.44 afy above the existing demand of 30.91 afy), the Project would have a less-than-significant contribution to the impacts on the cumulative water supply.

Development of future new development in the Project vicinity would cumulatively increase water demand on the existing water infrastructure system. However, the Project would result in a marginal increase in overall water demand. Moreover, new development projects would be subject to LADWP review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. The LADWP has adopted a 10-year Capital Improvement Program ("CIP") for the Fiscal Years ("FY") 2010-2019. Water supply system infrastructure improvements required of individual related projects that are beyond the LADWP CIP will be borne by the respective project applicants in consult with LADWP on a project-by-project basis. Therefore, the Project would not result in a significant contribution to any potentially significant cumulative impacts on water infrastructure.

# 5. **Project Design Features and Regulatory Compliance Measures**

The City finds that Project Design Feature W-1 and W-2, which is incorporated into the Project and is incorporated into these Findings as though fully set forth herein, would reduce the potential water demand impacts of the Project.

B. Solid Waste

# 1. Construction Generation, Diversion, and Disposal

Collectively, phased construction of the Education Master Plan would generate construction waste during demolition, remodeling, and new construction. Demolition would involve the removal of approximately 72,000 square feet of existing facilities (43,000 square feet from the East Campus and 29,000 square feet from the West Campus). Waste materials generated during construction will be typical construction debris, including concrete, stucco, asphalt, rocks, building materials, wood, paper, glass, plastic, metals, cardboard, other inert wastes (i.e., wastes that are not likely to produce leachates of environmental concern), and green wastes. Draft EIR Tables IV.K.2-4a through 5b provide a summary of construction waste for each construction phase within the East and West Campuses. Given that the County of Los Angeles has set a waste generation minimum of 75 percent by 2025, the current 65 percent diversion rate was used for Phase I at both Campuses, and 75 percent was used for all subsequent phases.

Waste generated during demolition and construction would result in an incremental and intermittent increase in solid waste disposal at landfills and other waste disposal facilities that accept solid waste generated in the City of Los Angeles. Debris would be trucked from the Campus sites for disposal at any of the 27 facilities listed in Draft EIR Table IV.K.2-1 that accept and recycle construction/demolition materials or to landfills in cases where the material is soil that is not recyclable. Unlike landfills, construction and demolition recycling facilities do not have landfill-related capacity problems or closure dates. In addition, there are three recycling centers: the East Valley Bulky Item Drop-Off Center, the Lake View Terrace Green Recycling Operation, and the Sun Valley Recovery and Transfer Station. Soil that is exported cannot be recycled. However, if an import site is not available, the exported soil can be trucked to landfills and used as a daily cover, which would not count against the permitted waste disposal capacity. Therefore, the Project would not need additional solid waste disposal facilities to adequately handle Project-generated inert waste, resulting in a less than significant impact with respect to construction waste.

The School would implement a demolition and construction debris recycling plan for all buildings demolished, renovated or constructed, with the explicit intent of requiring recycling during all phases of site preparation and building construction (Project Design Feature SW-2). During construction, the Project would not conflict with and would act to implement applicable City and County waste diversion goals and polices. The implementation of these practices would ensure that the construction phases of the Project are consistent with the solid waste objectives and policies of the City of Los Angeles Solid Waste Management Policy Plan, the City of Los Angeles Source Reduction and Recycling Element, the Framework Element, the Solid Resources Infrastructure Strategy Facilities Plan, the City Municipal Code, and the RENEW LA Plan. As such, the Project would result in a less than significant impact with respect to these solid waste plans, policies, and programs.

# 2. Operations Generation, Diversion, and Disposal

The Brentwood School is required to implement existing and future waste reduction programs in conformance with the City's Solid Waste Management Policy Plan ("CiSWMPP") and other previously identified mandatory programs. An amendment to AB 939 requires municipalities to divert 75 percent of solid waste by the year 2025. Additionally, the City's Zero Waste Plan, which is currently under development, would establish a goal of zero waste by 2030. The Education Master Plan improvements for both East and West Campuses are divided into phases that would occur in the future (through 2040) and would operate under more stringent waste diversion goals that are in place currently. However, the student enrollment increase would be completed by 2022 (four years after completion of Phase I), at which time the School's waste generation would be at its peak. For a conservative analysis, an assumption of the current diversion rate of 65 percent was used for this analysis.

As shown in Draft EIR Table IV.K.2-6, Education Master Plan Operational Solid Waste Generation, implementation of the Education Master Plan components together with the increase in students on the East Campus would generate an additional 56.3 tons of solid waste per year of which approximately 19.8 tons per year would be disposed in landfills. Because there would be no increase in enrollment or faculty on the West Campus, there would be no increase in waste generation on that Campus. Therefore, the total Brentwood School waste generation would increase to 202.3 tons per year (a 39 percent increase above existing conditions). It should be noted that the City's standards for waste diversion are planned to increase over time (i.e., 75 percent diversion in 2025), so actual waste sent to landfills would be incrementally decreased over the long-term operations of the Education Master Plan. Implementation of the Education Master Plan at the West Campus would not generate additional solid waste as the student body and staff would not be increased.

Solid waste not diverted from landfills would generally be disposed of through 2037 at Sunshine Canyon Landfill, and through 2042 at Antelope Valley Landfill. As listed in Draft EIR Table IV.K.2 2, landfills serving the City of Los Angeles also include the Lancaster Landfill, Calabasas Landfill, and Chiquita Canyon Landfill. The Lancaster Landfill has an estimated life of 13 years; Calabasas Landfill is estimated to have 16 years remaining; and Chiquita Canyon, an estimated two years. These landfills would reach capacity before build-out of the Project. Although Sunshine Canyon would reach capacity before Project completion, this landfill has the largest capacity of those previously described. As shown in Draft EIR Table IV.K.2-7, Disposal Capacities of the Primary Landfills Serving the Brentwood School, total disposal into Sunshine Canyon Landfill in 2007 was 1.8 million tons of waste. As of December 31, 2012, the remaining capacity of the Sunshine Canyon Landfill is 74.4 million tons with an estimated remaining lifespan through 2037.

The solid waste generated annually by the School following the Education Master Plan implementation and after diversion and requiring disposal would represent a less than 0.001 percent increase in annual disposal to Sunshine Canyon Landfill, and would result in an approximately 0.001 percent increase above the City's existing landfill contribution. Therefore, Sunshine Canyon Landfill has the capacity to accommodate solid waste generated by the School following implementation of the Education Master Plan through 2037. Once Sunshine Canyon Landfill discontinues landfill operations, then the regional capacity at the Antelope Valley Landfill could accommodate solid waste generated by the Project by construction through 2040 and operation through 2042.

# 3. Solid Waste Collection Routes

Under the Project, the East and West Campuses would continue to be served by existing solid waste routes. The only change would be an incremental increase in waste generated by the increase of students. As such, proposed development under the Education Master Plan would not create a need for additional solid waste collection

routes to adequately handle Project-generated solid waste and a less than significant impact would result.

## 4. Impacts to Solid Waste Policies

Implementation of the Education Master Plan would follow all goals set forth by the Source Reduction and Recycling Element ("SRRE") CiSWMPP, the Framework Element, and the Curbside Recycling Program because it is subject to review and approval by the City of Los Angeles. Additionally, the Brentwood School is currently subject to solid waste policies and objectives in place in the City of Los Angeles. The Project would comply with the implementation programs mandated by the SRRE and CiSWMPP. The proposed Project would not have a significant impact on City waste diversion policies and would continue to comply with applicable City waste diversion programs. Therefore, implementation of the proposed Education Master Plan would not conflict with these solid waste policies and objectives. Education Master Plan impacts on solid waste would be less than significant.

### 5. Cumulative Impacts

Existing landfills serving the Project site include the Sunshine Canyon Landfill, which has available capacity through 2037, and the Antelope Valley Landfill, which has available capacity through 2042. In addition, other landfills in the area have adequate capacity to accommodate Project-related disposal needs at different stages of Project completion. As diversion requirement would be increasing for the Project, related projects, and future projects over time to reduce the need for landfills, it is expected that the Project's contribution to cumulative landfill waste would decrease in the long term.

Construction: Construction waste from the development of the related projects combined with the Project would result in the cumulative increase in inert construction waste requiring landfill capacity. As listed in Section III, Environmental Setting and Related Projects, there are a combination of multifamily residential, commercial, restaurant, gymnasium, office, and school development projects occurring the vicinity of the Project. As shown in Draft EIR Table IV.K. 2-8, Estimated Construction Solid Waste Generation-Related Projects, the related projects would generate approximately 14,524 tons of waste during construction. Combined with the Project's construction waste of 1,860 tons, there would be total of 16,384 tons of construction waste that would be landfilled based on a 65 percent diversion rate for the related projects. Therefore, the Education Master Plan would represent approximately 12.8 percent of the total cumulative construction waste for the area. The daily waste generation would be spread out over many years and would not exceed the daily rates of intake for any receiving landfills. The Project's contribution of construction waste would occur through 2040 and during operations of the earlier phases of the Education Master Plan (e.g., following the increase in student enrollment in 2022). Given the requirements of the Citywide Construction and Demolition Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed construction and demolition waste generated within City limits

be taken to a City certified construction and demolition waste processor, it is anticipated that future cumulative development would also implement similar measures to divert construction and demolition waste from landfills. Furthermore, as described above, the unclassified landfill does not face capacity issues and would be expected to have sufficient capacity to accommodate cumulative demand. Therefore, cumulative impacts with respect to construction waste would be less than significant.

<u>Operations</u>: While in the short term, adequate landfill capacity exists to accommodate solid waste generated by the School, in the future, there remains a need to develop additional landfills and other waste disposal options to accommodate future growth. These options include diversion or transformation as the preferred methods for addressing solid waste and specific and practical applications (i.e., market development, public education, public policy initiatives) within the City of Los Angeles. Solid waste haulers will continue to have flexibility to determine where solid waste at landfills that are permitted to accept waste generated from within the City of Los Angeles, as well as those that have the permitted capacity to accept the waste.

The City of Los Angeles Solid Waste Management Plan (AB 939) sets forth strategies that would provide adequate landfill capacity through 2037 to accommodate anticipated growth. The Bureau of Sanitation has projected the need for waste disposal capacity based on SCAG's regional population growth projections. The growth associated with Education Master Plan implementation is within those projections. Furthermore, projects within the City of Los Angeles must comply with the City's SRRE. As reported by the Bureau of Sanitation in 2009, the City achieved a waste diversion rate of 65 percent. The City is exceeding the State-mandated diversion goal of 50 percent by 2000 set by the CIWMA of 1989. Waste diversion rates are required to increase to 75 percent by 2025, and on-going development of waste management infrastructure over the last decade and innovative source reduction, reuse, recycling, and composting programs have been implemented. These programs include Green Mulching and Composting workshops, black yard-trimmings recycling cans, the city-owned Central Los Angeles Transfer ("CLARTS"), Refuse Station and Residential Solvents/Automotive/Flammables/Electronics ("SAFE") Recycling and Disposal Centers. New programs are being implemented to increase the amount of waste diverted by the City, including multifamily recycling, food waste recycling, commercial recycling, and technical assistance and support for City departments to help meet their waste reduction and recycling goals. The City is also developing programs to ultimately meet a goal of zero waste by 2030.

For purposes of this analysis, the current standard of a 65 percent waste diversion rate is assumed for waste generation requiring landfill capacity for the related projects listed in Draft EIR Section III, Environmental Setting and Related Projects. As shown in Draft EIR Table IV.K. 2-9, Estimated Operational Solid Waste Generation—Related Projects, the development of related projects would result in a projected 713.7 tons of solid waste put into landfills every year.

Combined with the Project, the total cumulative solid waste generation would be 719.3 tons per year. Per the 2012 Annual Report, the forecasted 2020 waste generation volume for the County is approximately 24.75 million tons. The Annual Report assumes a 60 percent diversion rate, resulting in a disposal of 9.9 million tons in Class III Landfills and transformation facilities. The estimated Project generation net increase of approximately 19.8 tons of waste per year would represent only a tiny fraction of the cumulative waste generation in 2020. The Brentwood School improvements would be made over a long-term period (i.e., through 2040). The School's contribution to cumulative impacts would continue to decrease as it increases waste diversion rates in accordance with City goals.

The Los Angeles County Integrated Waste Management Plan ("CoIWMP") 2012 Annual Report provides an analysis under nine landfill scenarios for the County. The analysis concludes that the County would be able to provide for its 15-year disposal needs through 2037 by successfully permitting and developing all in-County landfill expansions, implementing alternative technologies, and expanding transfer and processing infrastructure, developing a waste-by-rail system, and maximizing waste reduction and recycling.

The County will continually address landfill capacity through the preparation of annual ColWMPs. The preparation of each annual ColWMP provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Furthermore, in future years, it is anticipated that the rate of declining landfill capacity would slow considering the City's SWIRP objective to achieve a 70 percent diversion goal by 2015, 75 percent diversion by 2020, and a zero waste goal by 2030. Because waste from the School will be delivered to landfills with capacity to accommodate the waste, and because the Project and related projects will be required to comply with City's zero waste policy by 2030, the Project's contribution to cumulative solid waste generation requiring landfill capacity is would be less than significant.

With respect to regulatory consistency, it is anticipated that, similar to the Project, the related projects would not conflict with applicable regulatory plans and instead would promote source reduction and recycling, consistent with the AB 939 and the City's Solid Waste Integrated Resources Plan, City's General Plan Framework Element, and RENEW LA Plan.

Furthermore, the cumulative solid waste generation associated with the development of the related projects could create a need for additional solid waste collection routes to adequately handle future solid waste generated by this development, which is considered a potentially significant cumulative impact. However, as no Project impacts in this regard would occur, the Project's contribution to cumulative impacts with regard to solid waste collection routes are concluded to be less than significant.

# 6. Project Design Features

The City finds that Project Design Feature SW-1 and SW-2, which is incorporated into the Project and is incorporated into these Findings as though fully set forth herein, would reduce the potential solid waste impacts of the Project.

C. Wastewater

# 1. Construction

The Project's construction activities will result in temporarily increased wastewater generation during the four phases of the 30-year Education Master Plan. These increased wastewater generation rates could occur from the construction workers on-site who may use restroom facilities that exist on each of the Campuses. These uses would be temporary and minimal in comparison with the Project's operational wastewater generation rates, which would take effect upon completion of each construction phase. Moreover, to accommodate construction worker wastewater, portable restrooms would be provided on-site, which would minimize any effect the construction wastewater would have on the capacity of the wastewater facilities serving each of the Campuses. The portable restrooms would be discharged at a receiving wastewater treatment plant on a regular basis through each of the construction periods.

Construction activities of the Project would involve the trenching of the ground surface to modify existing connections or install new sewer lines. These activities would be limited to the on-site wastewater conveyance infrastructure and may require minor off-site work associated with connections to the City sewer lines located below the streets adjacent to the each of the Campuses. Thus, vehicular and pedestrian access surrounding the Campuses may be affected during the modification and installation of the sewer line connections. As provided in Draft EIR Section IV.J, Transportation and Circulation, construction traffic would be managed per a required Construction Traffic Management Plan, which would ensure there are no secondary impacts to traffic as a result of temporary pipeline connection work within the adjacent roadways. These construction activities would occur in short-term durations over intermittent periods of times throughout the Project's four phases, so vehicular and pedestrian accessibility would not be significantly affected. Therefore, Project construction impacts to the City's wastewater system would be less than significant.

# 2. Operations

# East Campus

<u>Infrastructure</u>: As shown in Draft EIR Figure IV.K.3-3, Proposed Sewer Configuration for the East Campus, the City's two main eight-inch sewer lines under the Middle School Classroom Building and Parking Garage would remain, with the building foundation carefully designed to prevent building loads onto the new vitrified clay pipes ("VCP"). The existing buildings in the north part of the Campus would have new sewer laterals

coming out of the buildings. The North Quad buildings would extend the existing sewer lateral to a new sewer manhole on the south side of the Campus. The Temple Hall and the South Quad buildings would have sewer laterals coming out of the buildings that would connect to a manhole south of the Temple Hall and west of the South Quad buildings and continue south toward the manhole in between the new Middle School Gymnasium Building and the existing SLT Building.

The construction of a new Upper School Gymnasium Building along the southeast property (abutting the VA property) would require the City's 10-inch sewer line to be rerouted. This 10-inch sewer line would be rerouted onto the VA property along the southeast property line and connect to the existing sewer manhole at the north property line.

<u>Wastewater Generation</u>: The Education Master Plan would increase student enrollment at the East Campus from 695 to 960 students. This increase in students would result in increased demand on the existing wastewater treatment facilities that service the Campus. The City of Los Angeles, Bureau of Sanitation wastewater generation rates for students account for wastewater generated captured from classrooms, lecture halls, professors' offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouse and storage areas, and auditoriums. The additional buildings that are associated with the Project would also result in increased average daily wastewater generation at the East Campus. As shown in Draft EIR Table IV.K.3-5, Proposed Wastewater Generation for the East Campus, total operations of the East Campus are estimated to generate an average daily wastewater generation rates for the East Campus, the Project would result in a net increase in average daily wastewater generation of approximately 9,754 gpd.

<u>Treatment Plant Capacity</u>: Wastewater generated by the East Campus would be conveyed through the City's existing wastewater conveyance system to the Hyperion Treatment Plant. The Hyperion Treatment Plant has a design capacity of 450 million gpd, with 88 million gpd available capacity. As shown in Draft EIR Table IV.K.3-5, the Project would increase wastewater generation at the East Campus by 9,754 gpd. This increase represents a negligible percent of the 88 mgd available capacity of the Hyperion Treatment Plant. Thus, wastewater generated during operations of the East Campus at full build-out of the Education Master Plan would have a less-than-significant impact on the treatment capacity at the Plant.

<u>Conveyance Capacity</u>: Wastewater from the East Campus will all continue to be conveyed through the existing 10-inch sewer line that flows to the southeast from the Campus. The capacity of the existing sewer VCP was estimated based on two separate methods: (1) comparing size of the Project to the County of Los Angeles Department of Public Works' Flow Diagram for the Design Circular Sanitary Sewers for service capacity, and (2) comparing to the average daily use factors. According to the County of Los Angeles Department of Public Works' Flow Diagram for the Design Circular Sanitary Sewers for service capacity, and (2) comparing to the average daily use factors.

Sewers (see Figure 3 of the Sewer Capacity Analysis provided in Appendix IV.K), the 10-inch sewer VCP has a capacity that could serve approximately 140 acres of residential area or a discharge flow rate equivalent of 0.56 cubic feet per second (cfs) when half full. The size of the area that the sewer pipe is currently serving is approximately 96 acres and consists of mainly single-family residences, providing the equivalent of 0.38 cfs in wastewater generation. The improvements to the East Campus under the Education Master Plan are equivalent to less than 16 acres of residential development wastewater generation. Combining these Campus wastewater flows with those of the existing service area results in the equivalent service area of approximately 112 acres (96 acres + 16 acres). With capacity for 140 acres, the existing 10-inch sewer line will have adequate capacity to accommodate the increase in wastewater from the East Campus.

In the second method, the sewer capacity of the existing 10-inch sewer VCP and the increase in demand using the average daily generation at the cubic feet per second rate is considered. The total discharge flow rate is approximately 21,663 gpd, which is the equivalent of 0.03 cfs. Combining the increased wastewater flows from the East Campus with the existing discharge upstream of the Campus results in a total of 0.41 cfs (0.38 cfs + 0.03 cfs) of wastewater flow. At half full, the existing 10-inch VCP has a capacity of 0.56 cfs. The Wastewater Engineering Service Division of the City of Los Angeles, Bureau of Sanitation will provide official capacity determinations at the time the connection permits are obtained; however, based on these estimations, no upgrades to the existing sewer system are expected. Therefore, it is expected that there would be no significant environmental impacts as a result of sewer upgrade construction.

### West Campus

<u>Infrastructure</u>: As shown in Draft EIR Figure IV.K.3-4, Proposed Sewer Configuration for the West Campus, the proposed sewer connections for the West Campus would be separated into two different directions: The New Classroom Building with an admission wing would both have 6-inch VCP lateral pipes coming out of the building. Their connections would join at some point southwest of the New Classroom Building and continue west into the existing wye connection at Bundy Drive. The new Saltair Annex would connect its sewer outflow lateral, a four-inch VCP pipe to an existing sewer connection at Saltair Avenue.

<u>Wastewater Generation</u>: The Education Master Plan does not propose an increase in student enrollment at the West Campus, which would remain at 300 students. Therefore, an increase in wastewater generation associated with students is not anticipated to occur. Based on the City of Los Angeles, Bureau of Sanitation wastewater generation rates, the wastewater generation rate is inclusive of all new structures because the structures would support the existing student body, as well as the faculty and administration facilities. The additional buildings associated with the Project would, therefore, not result in increased average daily wastewater flows at the West Campus.

The improvements to the West Campus include two new parking garages and a net increase in administrative office space. The Draft EIR includes separate generation rates for these uses to provide a more conservative analysis. Also, in evaluating the capacity of the two sewer lines that serve the West Campus, wastewater generation was analyzed assuming 100 percent of the wastewater from the 300 students could be conveyed through either connection. Thus, the calculations shown in Draft EIR Table IV.K.3-6 and Table IV.K.3-7 also represent a conservative analysis.

As shown in Draft EIR able IV.K.3-6, Wastewater Generation for the West Campus (Bundy Drive), operations of the West Campus along Bundy Drive could generate an average daily wastewater flow of approximately 3,770 gpd, conservatively assuming the entire existing wastewater volume from 300 students flows into Bundy Drive. When factoring in the existing wastewater generation rates for the West Campus, the Project would result in a net increase in average daily wastewater flows along Bundy Drive of approximately 1,250 gpd.

As shown in Draft EIR Table IV.K.3-7, Proposed Wastewater Generation for West Campus (Saltair Avenue), the wastewater generation along Saltair Avenue would decrease. The Saltair Annex would replace the existing uses within the modular buildings and the Admissions Building would be demolished. These uses support the existing student body of 300 students, which as previously stated, will not increase. As shown in Draft EIR Table IV.K.3-7, the increase in wastewater generation is related to the new parking garage that would be constructed below the Saltair Annex. Conservatively assuming that the total volume of wastewater from 300 students flows into Saltair Avenue, operations of the West Campus along Saltair Avenue would generate a total of 3,315 gpd, or net decrease of 58 gpd.

<u>Treatment Plant Capacity</u>: The combined net average daily wastewater flows from both sides of the West Campus would be 1,192 gpd (1,250 gpd on the Bundy Drive side minus 58 gpd on the Saltair Avenue side). As with the East Campus, wastewater generated by the West Campus would be conveyed through the existing wastewater conveyance system at the Hyperion Treatment Plant. Thus, the West Campus' increase in wastewater generation would represent a negligible percentage of the 88 million gallons per day available capacity of the Hyperion Treatment Plant. Therefore, wastewater generated during operations of the West Campus at full build-out of the Education Master Plan would have a less-than-significant impact on treatment plant capacity.

#### Conveyance Capacity:

#### Saltair Avenue Sewer

Wastewater from the Saltair Annex will be connected to the eight-inch sewer VCP in Saltair Avenue. According to the County of Los Angeles Department of Public Works' Flow Diagram for the Design Circular Sanitary Sewers, the Saltair Avenue sewer VCP

has a capacity that could serve approximately 320 acres of residential area or a discharge flow rate equivalent of 1.28 cfs when half full. The size of the area that the sewer pipe is currently serving is approximately 50 acres and consists of mainly single-family residences, providing the equivalent of 0.2 cfs in wastewater generation. The wastewater flows from the West Campus under the Education Master Plan that could connect to the Saltair Avenue sewer are equivalent to 0 acres of residential development. Combining these flows with those of the existing service area results in the equivalent service area of approximately 50 acres (50 acres + 0 acres). With capacity for 320 acres, the existing eight-inch sewer line will have adequate capacity to accommodate the increase in wastewater from the West Campus, even under the conservative assumption that all West Campus wastewater is discharged on the Saltair Avenue side of the Campus.

In the second method, the sewer capacity of the existing eight-inch VCP and the increase in demand using the average daily generation at the cubic feet per second rate is considered. The total discharge flow rate is approximately 3,315 gpd, which is the equivalent of less than 0.01 cfs. Combining these improvements on the West Campus with the existing discharge upstream of the Campus, results in a total of 0.21 cfs (0.2 cfs + 0.01 cfs) of wastewater flow. At half full, the existing eight-inch VCP has a capacity of 1.28 cfs. The Wastewater Engineering Service Division of the City of Los Angeles, Bureau of Sanitation will provide official capacity determinations at the time the connection permits are obtained; however, based on these estimations, no upgrades to the existing sewer system are expected. Therefore, it is expected that there would be no significant environmental impacts as a result of sewer upgrade construction in Saltair Avenue.

#### **Bundy Drive Sewer**

Wastewater from the New Classroom Building and Admissions Building will be connected to the existing eight-inch sewer VCP in Bundy Drive. The capacity of the existing sewer VCP was estimated based on the same two methods described previously. According to the County of Los Angeles Department of Public Works' Flow Diagram for the Design Circular Sanitary Sewers, the Bundy Drive sewer VCP has a capacity that could serve approximately 190 acres of residential area or a discharge flow rate equivalent of 0.75 cfs when half full. The size of the area that the sewer pipe is currently serving is approximately 21 acres and consists of mainly single-family residences, providing the equivalent of 0.11 cfs in wastewater generation. The West Campus wastewater flows are equivalent to less than eight acres of residential development. Combining these West Campus flows with the flows from the existing service area results in the equivalent service area of approximately 29 acres (21 acres + 8 acres). With capacity for 190 acres, the existing eight-inch sewer line will have adequate capacity to accommodate the increase in wastewater conveyed through the Bundy Drive sewer.

In the second method, the sewer capacity of the existing eight-inch VCP and the increase in demand using the average daily generation at the cubic feet per second rate is considered. The total discharge flow rate for the West Campus is approximately 3,770 gpd, which is the equivalent of approximately 0.01 cfs. Combining the Bundy Drive side improvements with the existing discharge upstream of the Campus, results in a total of 0.12 cfs (0.11 cfs + 0.01 cfs) of wastewater flow. At half full, the existing eight-inch VCP has a capacity of 0.75 cfs. The Wastewater Engineering Service Division of the City of Los Angeles, Bureau of Sanitation, will provide official capacity determinations at the time the connection permits are obtained; however, based on these preliminary estimations, no upgrades to the existing sewer system in Bundy Drive are expected. Therefore, it is expected that there would be no significant environmental impacts as a result of sewer upgrade construction in Bundy Drive.

### 3. Cumulative Impacts

Implementation of the Education Master Plan would result in an increase of wastewater demand of the existing Campuses' operations and would continue to contribute to the cumulative wastewater generation of the area. In association with the related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, the long-term operation of the Campuses would cumulatively increase demand for wastewater treatment in the Hyperion Service Area, which is currently served by the Hyperion Treatment Plant. As shown in Draft EIR Table IV.K.1-8, Cumulative Wastewater Generation, the development of related projects would result in a wastewater generation of approximately 198,226 gpd. Combined with the net increase of approximately 10,946 gpd of wastewater from the Project, the cumulative wastewater generated by the net increase from the Education Master Plan and related projects would be approximately 209,172 gpd.

The City of Los Angeles, Bureau of Sanitation's Integrated Resources Plan ("IRP") projects wastewater flow and wastewater treatment capacity through year 2020. The 30-year Education Master Plan would be completed after year 2040. The student enrollment increase at the East Campus would be completed in year 2020. The IRP indicates that the Hyperion Service Area would have an average daily flow of approximately 512 million gpd in 2020, with a maximum wastewater capacity of 550 million gpd. The Project combined with the related projects and the forecasted 2020 wastewater flow of approximately 512 million gpd for the Hyperion Service Area would result in a marginal increase in total wastewater generation. In addition, as provided in Draft EIR Table IV.K.3-4, based on the LADWP UWMP predictions, the expected long-term wastewater generation for the entire service area is estimated to be 472 mgd in year 2040. While the two reports have different expected wastewater generation volumes, in either case, there would be adequate capacity to accommodate the future projected growth in the entire service area, as well as the marginal contribution of cumulative daily wastewater generation from the Project and related projects combined.

Furthermore, the related projects would be subject to the City's Municipal Code, Sections 64.11 and 64.12, which indicates the required approval of a sewer permit prior to connection to the sewer system. The purpose of this sewer permit is to determine that adequate sewer capacity is available to support the demands of proposed projects. Additionally, these related projects would be required to pay the City's Sewer Service Charge. Payment of such fees would help to offset the costs associated with infrastructure improvements that would be needed to accommodate wastewater generated by overall future growth. Furthermore, similar to the Project, each related project would be required to comply with water conservation programs of the local jurisdictions and the State.

Therefore, given that the Project when combined with related projects would not have substantial impacts on existing and projected wastewater treatment capacities and infrastructure, cumulative impacts would be considered less than significant.

# 4. Project Design Features and Regulatory Compliance Measures

The City finds that Regulatory Compliance Measures WW-1 and WW-2, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential solid waste impacts of the Project.

D. Energy Usage

# 1. Construction

During Project construction, energy would be consumed in three general forms: (1) petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, as well as delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities); (2) electricity associated with the conveyance of water that would be used during Project construction for dust control (supply and conveyance), and electricity associated with providing temporary power for lighting and electric equipment inside temporary construction trailers and within the proposed structures; and (3) energy used in the production of construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass. During peak activities, Project construction would require a total of approximately 435 gallons of diesel fuel and 328 gallons of gasoline on daily basis. This fuel consumption would occur during Phase I on the East Campus and would include energy consumption due to worker vehicle trips, heavy duty equipment operation, and the hauling of materials.

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. In addition, construction activities would be subject to regulatory compliance measures designed to reduce the consumption of energy resources, such as those presented in Draft EIR Section IV.C, Air Quality. Specifically, Regulatory

Compliance Measure RCM AQ-2 would require idling of heavy duty diesel construction equipment and trucks during loading and unloading during construction to be limited to five minutes at any location. Compliance with this measure would reduce the Project's reliance on petroleum-based fuels during construction activities, and the Project's consumption of petroleum-based fuels would not have an adverse impact on available supplies. In addition, with regard to trips for hauling demolition materials, the City of Los Angeles has adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. The Project's compliance with these regulations would reduce the number of trips and fuel required to transport construction debris and in turn would reduce the wasteful, inefficient, and unnecessary consumption of energy.

Electricity would be consumed during the conveyance of the water used during construction activities that require the use of water to control fugitive dust. The needed 1.78 acre-feet of water would require approximately 4,340 kWh of electricity to be consumed during Project construction. Furthermore, electricity would be used to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structures. This electricity would be supplied to the Project site by LADWP and would be obtained from the existing electrical lines that connect to the Project site. Similar to the use of petroleum-based fuels, electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary depending on site-specific operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity generation that would not be expected to have an adverse impact on available electricity supplies.

While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials such as concrete, steel, etc., would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. In addition, the Project would feature a sustainable design to comply with CALGreen, which would also result in the use of sustainable materials and recycled content that would reduce energy consumption during Project construction.

Therefore, the Project's on-site construction activities would not result in the wasteful, inefficient, or unnecessary use of energy resources, create energy utility system capacity problems, create problems with the provision of energy services, or result in a significant impact associated with the construction of new or expanded energy facilities. Furthermore, Project construction would not violate state or federal energy standards or consume a substantially greater amount of energy than other similar projects. As such, impacts would be less than significant.

# 2. Operation

During operation of the Project, energy would be consumed for multiple purposes including, but not limited to, HVAC, refrigeration, lighting, electronics, office equipment, and commercial machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. Annual energy use has been calculated for build-out of the Project. The Project is expected to result in a net increase in energy use of approximately 2,754,652 kWh of electricity per year, 552,838 cubic feet of natural gas per month, 50,700 gallons of gasoline per year due to increased daily, non-peak-hour trips.

Electricity transmission to the Project site is provided and maintained by LADWP through a network of utility poles and underground utility lines. The LADWP would have adequate supplies to serve the Project's electricity demand. Thus, impacts with regard to electrical supply and infrastructure capacity would be less than significant, and no mitigation measures would be required.

Natural gas service is provided to the Project site by the Southern California Gas Company ("SoCalGas"). Buildout of the Project is estimated to result in a net increase of approximately 552,838 net cubic feet per month (cu ft/month) or approximately 19,745 net cubic feet per day of natural gas consumed on-site. Therefore, SoCalGas would have adequate supplies to serve the Project's natural gas demand. Impacts with regard to natural gas supply and infrastructure capacity would be less than significant and no mitigation measures would be required.

Energy usage on the Project site would be further reduced through the implementation of a variety of measures designed to reduce energy consumption. The Project would comply with applicable provisions of the 2013 CALGreen Code, in accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City of Los Angeles Ordinance No. 182,849). The City of Los Angeles Green Building code includes a variety of measures for energy reduction, renewable energy, water usage, and construction waste disposal and recycling. In addition, under Project Design Feature PDF GHG 2, environmentally sustainable design features would be incorporated into new buildings sufficient to achieve LEED Silver level. Such LEED features could include LED site lighting, building management system to control HVAC and lighting, skylights where possible to use natural light for illumination, and smart grid energy management system and smart grid compatible technologies to reduce the energy demand and promote energy storage to reduce peak energy demand.

Solid waste collection services are provided by the City of Los Angeles Bureau of Sanitation. As stated in Draft EIR Section IV.K.2, Public Utilities–Solid Waste, the Project's net increase of 13.5 tons per year (after diversion) of solid waste disposal would represent an approximately 0.001 percent increase in annual disposal to Sunshine Canyon Landfill and would result in an approximately 0.001 percent increase above the City's existing landfill contribution. Therefore, the landfills that service the

Project site would have adequate capacity to accept the solid waste that would be generated by operation of the Project.

The use of energy provided by alternative (i.e., renewable) resources, off-site and onsite, to meet the Project's operational demands is constrained by the energy portfolio mix managed by the LADWP, which is the service provider for the Project site, and limitations on the availability or feasibility of on-site energy generation. The LADWP is required to procure at least 33 percent of their energy portfolio from renewable resources by 2020. The current sources procured by the LADWP include biomass and biowaste; eligible hydro, solar, geothermal, and wind and they account for 23 percent of the DWP's overall energy mix in 2013, the most recent year for which data is available. This represents the available off-site renewable sources of energy that would meet the Project demand. LADWP has a somewhat higher percentage of energy from renewable sources than the statewide average of 15 percent.

In regard to the availability and feasibility of alternative modes of energy generation, there are no substantial local sources of alternative energy in proximity to the Project site to which the Project could connect. However, the Project's LEED design features would include provisions for future access, off-grid prewiring, and space for electrical solar systems with a goal of at least 20 percent renewable energy supply for the Project and existing Campus.

The Project would result in the consumption of fuel related to vehicular travel to and from the Project site. However, as part of the Education Master Plan, and consistent with Mitigation Measure MM TR-1, the Brentwood School will expand its TDM program so that there will be no net increase in vehicle trips during the A.M., midday, and P.M. peak hours. This will reduce vehicle miles travelled and associated fuel consumption resulting from the Project to nominal levels.

Overall, the Project would be designed and constructed in accordance with State and local green building standards that would serve to reduce the energy demand of the Project. In addition, based on the above, the Project's energy demand would be within the existing and planned electricity and natural gas capacities of LADWP and SoCalGas, respectively. Furthermore, construction and operational trips, which use petroleum-based fuel, would be minimized due to various regulations and Project design features. Therefore, the Project would not violate State or federal energy standards or consume a substantial amount of energy in either construction or operation as compared to other similar projects. As such, development of the Project would not cause wasteful, inefficient, and unnecessary consumption of energy and would be consistent with the intent of Appendix F of the CEQA Guidelines. Impacts would be less than significant.

### J. Public Services

A. Fire

## 1. Construction

Between both the East and West Campuses, construction activities would occur over a total of four phases through the year 2040. Construction of the Project would increase the traffic from mobilization of heavy equipment and construction worker trips to and from the construction areas. However, construction workers would arrive and depart outside of the peak hours. In addition, pursuant to Project Design Feature PDF TR-7, all heavy truck hauling of construction equipment, construction materials deliveries, and excess soil export will be limited to the hours between 9:00 A.M. and 2:30 P.M. to avoid both the A.M. and P.M. peak-hour traffic periods. Therefore, temporary construction traffic would not have a significant impact on LAFD responses times.

Staging of trucks and equipment would all occur within the Campus boundaries and the construction workers would park in designated areas within the East Campus. As such, it is not expected that public travel lanes would be closed, except for temporary exit and entrances to the Campuses or work where new driveway cuts would extend into the road rights-of-way. This construction and traffic could increase travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Campuses during construction, which could increase response times for emergency vehicles should they be traveling to the Project site or to nearby uses along surrounding streets. However, as discussed in Draft EIR Section IV.J, Transportation and Circulation, a construction traffic management program would be implemented to ensure that adequate and safe access and parking remains available within each Campus during construction activities. As part of this program, emergency vehicle access would be maintained, and construction traffic management personnel would be required to control traffic that could interfere with emergency vehicle access.

During construction there is a potential for accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. In compliance with OSHA and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response and fire safety operations before the start of construction activities as a measure to reduce potential hazards. In addition, storage of hazardous or flammable materials on-site or fueling of construction equipment would require compliance with all applicable federal, State, and local requirements that would effectively reduce the potential for Project construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Based on these factors, Project construction would not be expected to affect firefighting and emergency services to the extent that there would be a need for any additional new or expanded fire facilities or personnel in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD.

### 2. Operations

<u>Fire and Emergency Responses</u>: Increased buildings and facilities within the East and West Campuses and increases in daytime population at the East Campus could increase the demand for fire protection and emergency response of the LAFD. Fire Station No. 19, which is located 0.9 mile away from the East Campus and less than 0.3 mile away from the West Campus, is the closest station and is equipped with one engine and one rescue ambulance. Both Campuses would continue to be primarily served by Fire Station No. 19 upon completion of the Project with back-up from other stations as needed. Fire Station No. 19 would remain the first-in station, located approximately 0.3 mile away from the West Campus and 0.9 mile away from the East Campus. This is consistent with the LAMC for response distance to a fire station with an engine company.

The increase in daytime student population of 265 and up to 62 full-time employees and contract staff at the East Campus would potentially increase the demand on the current fire protection services. The increased demand could affect service ratios between firefighters and population served, response times, and other LAFD performance objectives. However, implementation of Project Design Feature PDF FP-1 and compliance with Code requirements would ensure that adequate fire prevention features would be provided. In addition, the daytime population increase resulting from the Project would not be material in relation to the daytime population within the service area of Fire Station No. 19. Moreover, the Project would fall within LAFD's maximum prescribed response distances. Therefore, impacts with regard to fire response distance would be less than significant.

As provided in Draft EIR Section IV.J, Transportation and Circulation, the Project would result in long-term increases in traffic on surrounding roadways as a result of the increase in student enrollment and staff. Increased traffic could also have an impact on fire response if the response capabilities of LAFD are slowed by the increase in traffic on the local streets. However, as provided in Draft EIR Section IV.J, a Transportation Demand Management Plan would be implemented to ensure that no new A.M. peak-hour, midday, or P.M. peak-hour traffic is generated as a result of the Project. The non-peak traffic generation would not significantly affect the level of service of the roadways. Therefore, the Project would not materially increase travel times and would not significantly impact City-designated disaster routes, the closest of which are San Vicente Boulevard and the I-405 Freeway. Therefore, Project-related traffic is not anticipated to impair LAFD from responding to emergencies at the Project site or the surrounding area. Project traffic impacts with regard to fire response and response times would be less than significant.

<u>Access</u>: The Project would maintain internal emergency access to both Campuses. LAFD fire engines would not likely enter the parking garages at either Campus. Emergency Access at the East Campus would continue to be provided from the following locations: a gated entry at Layton Drive; and at the secondary access at the intersection of Barrington Place and Chayote Street. Each of these access points would provide access to buildings throughout the Campus. Emergency Access to the Middle School Classroom Building and Parking Garage would also be available directly from its frontage along Barrington Place. At the West Campus, the structures would be situated around the perimeter of the Campus with a central open space. LAFD and other emergency response personnel could access the Campus from either Saltair Avenue or Bundy Drive. Emergency vehicles could also access the central open space from Saltair Avenue. If required, LAFD personnel could access the enclosed parking garages via stairs and walkways. In addition, as provided above, and as required by the Los Angeles Fire Code and included as a Project Design Feature, the site plan and individual building permit applications would include a review by the LAFD to ensure adequate setbacks between structures are maintained and that all sides of buildings can be accessed by emergency personnel and emergency equipment. No structures would be located beyond 150 feet from a location in which a fire engine could be parked. The Project's impacts to fire protection capability and emergency personnel with regard to accessibility would be less than significant.

Fire Flow: The Project improvements to the East and West Campuses would continue to be served by LADWP for domestic water and fire flow water. According to the City of Los Angeles Fire Code, Article 7, Chapter 5, the minimum fire flow requirement for water mains in the streets surrounding the Project site is 4,000 gallons per minute ("gpm") flowing from four hydrants simultaneously at 20 pounds per square inch (psi) of residual This requirement applies to high density residential or neighborhood pressure. commercial land uses, which is equivalent to the Project in terms of fire flow requirements. Water service, including fire flow, is currently provided to both the East and West Campuses and Project Design Features would improve the fire loop water system through each of the Campuses with connections to existing LADWP water lines on and adjacent to the Campuses. The Campuses currently meet the minimum requirements with a current water availability pressure of 195 psi. Under the Project, hydrants with adequate fire flow pressure would be provided at the East and West Campuses in consultation with LAFD.

The Water Operations Division of the LADWP would perform a fire flow study at the time of permit processing and review for each of the Project's phases of construction in order to determine whether the system in place at the time contains adequate fire flow pressure or if site-specific improvements would be necessary. As provided in the Project Design Features discussed previously and in Draft EIR Section IV.K.1, Public Utilities– Water, the on-site water system infrastructure improvements would not create significant environmental impacts because they would include minor trenching within areas to be graded for construction, any disruption of service for the Campus while improvements are made would be temporary and planned to avoid school days, and water lines and hydrants would be installed per the City's Fire Code standards.

In reference to proposed sprinkler systems, the minimum requirement for fire flow pressure and locations for any additional fire hydrants within or adjacent to either Campus is set by LAFD at the time of review of building plans. Since the fire flow for

new connections to the main lines and any upgrades to the supply lines for protection of the new structures would be conducted in accordance with LAFD standards, impacts to fire flow standards are considered less than significant.

## 3. Cumulative Impacts

As provided in Draft EIR Section III, Environmental Setting and Related Projects, the related projects consist of multifamily residential projects, mixed uses, commercial developments, a recreational building, and the Archer Forward project. These related projects in combination with the Project would cumulatively increase the demands for fire protection services. Using population conversion factors provided in the L.A. CEQA Thresholds Guide, a fire protection service population for related projects is estimated to be 3,008 persons, as shown in Draft EIR Table IV.M.1-4, Related Projects Service Population. Combined with the Project student and faculty and staff increases, the total cumulative service population would be 3,335.

There is not an anticipated increase in the residential population of the West Los Angeles area as a result of the Project; however, fire protection and emergency services and fire flow infrastructure within the City may potentially be affected due to the increased demand on services. However, similar to the Project, the related projects would be reviewed by LAFD to ensure that sufficient fire safety and hazards measures are implemented to reduce potential impacts to fire services and related projects would be required to comply with fire protection and emergency medical services requirements.

As with the Project, each related project would be subject to City requirements relative to water availability and accessibility to firefighting equipment. Each related project would be required to comply with all applicable code and ordinance requirements for access, water mains, fire flows, fire sprinkler systems, and fire hydrants. Increased revenues from developer fees, property tax, sales tax, and special tax revenue could fund necessary increases in staffing and equipment. The level of fire protection services would be increased to keep pace with increased demands. Each related project would be reviewed for compliance with all applicable fire codes and regulations. Furthermore, the City publishes a monthly progress report to monitor the progress for construction of new fire protection facilities related to Proposition F, Fire Facilities Bond. Therefore, with the funding associated with the Project and all related projects, increased fire protection services would be met by increases in staffing and equipment, and cumulative impacts would be less than significant.

# 4. Project Design Features

The City finds that Project Design Feature FP-1, which is incorporated into the Project and is incorporated into these Findings as though fully set forth herein, would reduce the potential fire service impacts of the Project.

B. Police

### 1. Construction

Construction activities could create circumstances that require additional police protection services. Construction would involve the transport of heavy equipment during mobilization for a given phase of construction at each Campus, construction worker traffic, hauling of soil or other construction materials, and temporary construction areas that could be subject to theft and safety concerns.

Construction-related traffic on adjacent streets could potentially reduce response times for police services should police vehicles be slowed by the increased construction traffic. However, construction workers would arrive and depart outside of the peak hours. In addition, pursuant to Project Design Feature PDF TR-7, all heavy truck hauling of construction equipment, construction materials deliveries, and excess soil export will be limited to the hours between 9:00 A.M. and 2:30 P.M. to avoid both the A.M. and P.M. peak-hour traffic periods. Therefore, temporary construction traffic would not have a significant impact on LAFD responses times.

Emergency access to and near the Campuses could be temporarily constrained while utilities, driveway, garages, or buildings are under construction. Construction traffic could also temporarily obstruct the flow of traffic near entrances to the Campuses due to flagging or stopping of traffic to accommodate heavy equipment or trucks entering and exiting the Campuses during construction. As such, construction activities could increase response times for emergency vehicles travelling to the site and nearby uses However, as discussed in Draft EIR Section IV.J, along surrounding streets. Transportation and Circulation, a construction traffic management program would be implemented to ensure that adequate and safe access and parking remains available within each Campus during construction activities. As part of this program, emergency vehicle access would be maintained and construction traffic management personnel would be required to control traffic that could interfere with emergency vehicle access. In addition, truck queuing, equipment staging, and construction worker parking would be confined to designated on-site areas, and construction workers for the West Campus would be required to park on the East Campus.

During construction, equipment and building materials could be temporarily stored on site, which could result in theft or potential safety hazards. This could potentially necessitate police involvement, unless adequate safety and security measures are implemented to secure each of the construction zones during active construction and while temporarily stopped (e.g. off hours, Sundays or holidays). The Project Design Features include the installation of security features of the construction zones and staging areas within each of the Campus. These areas would be well lighted during evening hours and secured with a locked fence enclosure. In addition, the perimeters of the Campuses would remain secured, as they are currently, so there would not be opportunities for the general public, thieves or vandals to enter the Campuses easily and, subsequently, the construction and staging areas.

With the management of construction traffic, and security features for the construction areas, impacts to police protection services during construction activities would be less than significant.

### 2. Operations

The Project would upgrade and expand the educational facilities at the Brentwood School with an anticipated enrollment increase of 265 students at the East Campus. New buildings would be developed at each of the East and West Campuses with a net new 170 parking spaces and 24 parking spaces, respectively. The operations of the Project would also result in an increase of up to 55 full-time staff and seven contract workers.

The increase in student enrollment and employees at the East Campus would create an additional demand on the Los Angeles Police Department, specifically at the West Los Angeles Community Police Station. However, the Project is not anticipated to increase the number of residents within the RD 813 service area or the City of Los Angeles, and as such there would not be an additional demand created on the LAPD as a result of an increase in residential population. The increase in daytime population through the increase in students and employees that would travel to the East Campus, and, therefore, the RD 813 service area, would only marginally affect the current officer-to-Moreover, the East and West Campuses would continue to be population ratio. maintained as closed Campuses requiring all visitors, guests, and vendors to have appointments prior to being granted access, and the Brentwood School would continue to maintain full-time security guards during all Campus hours. Furthermore, the Project would implement design features as outlined previously, and would be required to consult with the LAPD's Crime Prevention Unit to ensure the design meets the Design Out Crime Guidelines standards prior to construction. Therefore, the Project would not require any new or the physical alterations to the existing police stations already servicing the Campuses.

As provided in Draft EIR Section IV.J, Transportation and Circulation, the Project could result in long-term increases in traffic on surrounding roadways as a result of the increase in student enrollment and School staff. Increased traffic could also have an impact on the capabilities of LAPD to police any corresponding increases in traffic violations and accidents traffic on the local streets. However, as provided in Draft EIR Section IV.J, a Transportation Demand Management Plan would be implemented to ensure that no new A.M., midday, or P.M. peak-hour traffic is generated as a result of the Project. The non-peak traffic generation would not significantly affect the level of service of the roadways. Therefore, the Project would not materially increase travel times and would not significantly impact Emergency Access to the Campuses and surrounding uses or significantly impact City-designated disaster routes, the closest of which are San Vicente Boulevard and the I-405 Freeway. Therefore, Project-related traffic is not anticipated to impair LAPD from responding to reports of crimes or emergencies at the Project site or the surrounding areas.

Given that the Project would not increase the number of residents within the City of Los Angeles, result in the need for any new or the physical alteration to any existing facilities, or significantly increase the service population ratio or calls beyond the current capacity of the LAPD, implementation of the Project would have less-than-significant impacts on police services.

## 3. Cumulative Impacts

Implementation of the Education Master Plan, in association with the related projects identified in Draft EIR Section III, Environmental Setting and Related Projects, would cumulatively increase demand for police protection services within the West Los Angeles Community Police Station area.

The related projects would result in an increase in population of 928 new residents and approximately 2,158 non-residents. The Project is not expected to generate an increase in residents within the service area of the West Los Angeles Community Police Station area, but would contribute to the non-resident service population with an increase in student enrollment of 265 students and 55 faculty and staff and seven contract workers. As such, the total non-resident service population of the Project and related projects combined would be 2,485 persons. However, the Campuses are located within an existing urbanized area with existing police services, and that each of the related projects would likewise be developed within the urbanized area of West Los Angeles, and are within the existing service areas of established police stations. In addition, similar to the Project, each related project would also be subject to the City of Los Angeles' permitting review process, which requires a review by the LAPD to determine any requirements to meet police protection standards from both a design standpoint and a service population-to-officer ratio. Furthermore, over time, the Los Angeles Police Department would continue to monitor population growth and land development throughout the City and identify additional resource needs, including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and funding allocated accordingly. Therefore, the Project's contribution to cumulative impacts to police protection services would not be cumulatively considerable and, as such, cumulative impacts on police protection services would be less than significant.

# 4. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features PS-1 to PS-8, which are incorporated into the Project and is incorporated into these Findings as though fully set forth herein, would reduce the potential police service impacts of the Project.

# K. Transportation/Circulation

1. Project Access Driveways – West Campus

Access to the West Campus will continue to be provided at the Bundy Drive driveway near the northwest corner of the Campus, opposite the T-intersection of Bundy Drive and Bonny Lane, as described in Draft EIR Section II, Project Description. This driveway will provide access into and out of the parking garage below the Arts and Athletic Building.

West Campus traffic will enter and exit the school site through this driveway, and all drop-off/pickup activity will take place within the School Site, avoiding any queuing on public streets.

Alternate access for some staff and visitors is currently provided from Saltair Avenue immediately north of Sunset Boulevard. The existing design at Saltair Avenue operates with a gated driveway. The redesign of this access will include an entrance driveway (at the north edge of the property) and an exit driveway (south of the entering driveway). Internally, a total of four standard stalls will be provided for temporary parking. This configuration will reduce internal conflicts in the parking lot and reduce the interaction between vehicles and pedestrians. The Saltair access is expected to be utilized for students entering/leaving the Campus during off-peak hours (such as sickness or other variables) and pick-up and drop-off for the employee childcare facility. The childcare facility provides care for West Campus employees only. Due to the reduction in parking spaces at this secondary driveway, along with no increase in student population, access impacts at the West Campus would be less than significant.

2. Bicycle, Pedestrian, and Vehicular Safety

### East Campus:

The Project Area is currently developed with infrastructure for pedestrian, bicycle, and public transportation. The existing conditional use permit regulates arrivals at the East Campus in the morning peak hour by restricting single student occupant vehicles from arriving after 7:30 A.M. After 7:30 A.M., only carpools are allowed to enter. In this way, the School enforces the use of high-occupancy vehicles during the morning peak hour.

Students enter from either Barrington Place through the Sunset Gate or from the second gate near intersection of South Barrington Place and Chayote Street, and filter into lots or through the drop-off area in the middle of the Campus that is monitored by security and staff. The majority of vehicles exiting the East Campus leave through the Barrington Place and Chayote Street intersection. The Sunset Gate is typically not used as an exit.

Vehicles entering the Campus in the morning at the Sunset Gate on Barrington Place currently have a shortened available queue lane and sometimes block the southbound through-travel lanes on Barrington Place. Northbound traffic at the signal at Sunset Boulevard also has a tendency to block the Campus driveway. This point of congestion is improved with Project improvements that install a new driveway farther from Sunset Boulevard, allowing greater distance from the intersection, thus providing a larger refuge for left-turning vehicles into the Project driveway and avoiding conflicts with northbound traffic waiting at the intersection.

The pickup and drop-off of students is currently handled on site near the center of Campus. School security personnel are available to keep traffic organized and moving and to ensure the safety of the students. Adequate storage capacity for vehicles is provided on site for all exiting vehicles.

After construction of the Middle School Classroom Building parking structure on the Middle School Athletic field, pickup and drop-off would occur within the structure. This pickup and drop-off would be accomplished fully on site and would not affect circulation on City arterials. More area would be available for off-street queuing in the forecourt of the New Middle School Classroom Building.

At full build out, the Project would consolidate the parking areas into garages and would remove surface parking and vehicular circulation through the areas of the Campus where students congregate and walk between classes and athletic fields. This would improve the internal circulation safety.

Therefore, access and internal circulation would be improved on the East Campus, and the Project's bicycle, pedestrian and vehicular safety impact would be less than significant.

#### West Campus:

The West Campus currently operates a one-way pickup/drop-off system beginning at the southern driveway on Bundy Drive. Security guards, staff, and parents work together to queue vehicles to the head of the line and assist students from their vehicles. This eliminates the need for children to walk between vehicles. This process is efficient and allows the queue to move quickly. Parents also have the option of driving into the garage and escorting students into the building.

Based on field observations, the Bundy Drive gates open at 7:20 A.M. and the longest queue occurs at approximately 8:20 A.M., extending nearly to Bundy Drive. The queue clears by 8:25 A.M. when the access gates are locked.

In the afternoons, nine small buses queue on site prior to the end of the school day. The gates remain locked while students are loaded into buses using a cross-checked roster. Once the buses clear, parent pickup is allowed. Students gather inside the parking garage until their name is called. Staff is placed at both ends of the queue line, signaling ahead the name of the student to prepare for pickup. As soon as the vehicles queue to the front, students are quickly loaded, keeping the stream of vehicles moving efficiently.

During observations, vehicles were completely accommodated on site without stacking onto Bundy Drive. However, the on-site traffic facilitators noted that in the past the queue sometimes would stack from southbound Bundy Drive while parents waited to turn left into the school driveway. An increase in staff and parental experience with the modified procedures has significantly reduced the wait times for boarding students into vehicles, thereby improving circulation.

The Project proposes alterations to the parking configuration on the Saltair Avenue side of the West Campus to include four standard parking spaces internal to the site with a one-way entrance driveway and a separate one-way exit driveway. The City will require curb, gutter, and sidewalk improvements along the Project frontage on Saltair Avenue to meet the minimum code requirements, and compliance with the Americans with Disabilities Act ("ADT") for sidewalk width, slope, gradient, and curb ramps. These improvements would improve circulation, and would ensure that the Project will have a less than significant impact on pedestrian, vehicular, and bicycle safety

3. Parking

#### East Campus:

A total of 326 existing parking spaces are on or adjacent to the East Campus, with 135 spaces located on School-owned property (the northern parking lot and south lots) and 191 spaces located on VA property (senior, junior, southeast faculty, and south faculty lots). Parking for 11 buses is also provided on the VA property near the Chayote gate. Buses for visiting sports teams also park in this area. Additional faculty and staff parking is located in scattered smaller lots on the VA property. Senior student parking is located on the VA property, in a lot adjacent to the southeast property line of the Campus. Junior students and visiting athletic teams use a parking lot located on the south rim of the Campus. After completion of the Project, a total of 305 spaces will be provided on site without relying on parking on the VA property.

There are no specific requirements for high school classroom parking set forth in the LAMC. However, the LADBS has imposed additional parking requirements beyond those set forth in LAMC Section 12.21A.4.(e). LADBS also requires parking for the playing court in a gym at a rate of one space per 500 square feet of court area. For middle and elementary schools, LADBS requires that parking be provided based on classrooms (one space per classroom) and administrative offices (one space per 500 square feet of building area). As set forth in Draft EIR Table IV.J-6, Required and Provided East Campus Parking, at full buildout the required parking is 281 spaces based on these requirements. With the Project's 305 on-site parking spaces, the Project's East Campus parking supply would exceed the LAMC requirement and would accommodate the Project growth. Therefore, on-site parking impacts would be less than significant.

<u>On-Street Parking Space Removal on Barrington Place</u>: The Project's striping concept (as described in Project Design Feature PDF TR-5 and Draft EIR Figure IV.J-4) requires the removal of two metered parking spaces and placement of peak-hour (3:00 P.M. to 6:00 P.M.) parking restrictions for approximately seven parking spaces on the

north side of Barrington Place and the removal of two metered parking spaces on the south side of Barrington Place opposite the proposed new driveway.

To determine the impact of removing up to four metered parking spaces on Barrington Place, a parking demand study was performed on a Friday during a large event at the Brentwood School East Campus, as well as on a Saturday, from noon to 8:00 P.M. The scope of the parking demand count included all of the metered spaces on Barrington Place from Sunset Boulevard to Chayote Street, as well as the VA lot. In total, 325 spaces were inventoried for the demand count.

On a worst-case Friday school event in May, the highest peak demand occurred from noon to 1:00 P.M., showing 92 percent of all parking spaces in use (leaving 26 spaces in the area). The nine spaces on the north end, which are distant from the retail hub and School driveway, had only two vehicles parked during this hour, which shows that these spaces are underutilized even during a School event.

The parking demand on Friday showed dramatic reductions at 3:00 P.M., which is when the School event was completed, reflecting 56 percent of the parking inventory in use for that hour. From 4:00 P.M. to 8:00 P.M., the parking demand was less than 50 percent occupied each hour.

Review of the Saturday data collection shows the worst-case demand occurs at noon, with 70 percent of spaces occupied (leaving 97 available spaces). Fewer than 50 percent of the spaces were occupied from 3:00 P.M. to 8:00 P.M.

The parking occupancy of the northern nine spaces in the immediate vicinity of the new driveway on Barrington Place ranged from zero to four vehicles during any one time period on Friday or Saturday. Even under a worst-case School event, permanent removal of up to four spaces would not result in a deficiency of public parking for the area. Parking demand counts may be found in Appendix D of the Transportation Study in Appendix IV.J. Furthermore, the expanded on-site parking would accommodate more event-related vehicles on the Project site than existing conditions, which would further reduce the parking demand in the area.

Therefore, impacts to on-street parking from the proposed removal of up to four onstreet parking spaces and the placement of peak-hour parking restrictions for approximately seven parking spaces would be less than significant.

#### West Campus:

There are currently 92 parking spaces on site. A total of 65 spaces of on-site parking are accessed from the Bundy Drive entrance and are accommodated within the Bundy Garage on the lower level of the Arts and Athletics Center. A total of 27 spaces of Campus parking are accessed from Saltair Avenue and are accommodated at the Saltair lot. Most faculty and staff use the Bundy garage, while some staff and all visitors use

the Saltair lot. After completion of the Master Plan elements for the West Campus, a total of 24 net new spaces will be added on site, for a total of 116 spaces. The parking is summarized in Draft EIR Table IV.J-7, Required and Provided West Campus Parking. The LAMC requires one space per classroom for elementary schools and one space for every 500 square feet of administration area. The completed West Campus will require 60 parking spaces and will provide a total of 116 on-site parking spaces. Therefore, the West Campus will exceed LAMC parking requirements.

#### 4. Transit System Impacts

The Congestion Management Plan ("CMP") (Section D.8.4) provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the number of vehicle trips. The regional methodology assumes an average vehicle occupancy ("AVO") factor of 1.4 in order to estimate the number of person trips to and from the Project. Since significant data collection was completed for the Brentwood School and exhibits an AVO higher than the CMP, the empirical data from the Brentwood School of 2.2 AVO was applied to the analysis, which resulted in more conservative data.

The CMP guidelines estimate that approximately 3.5 percent of total Project person trips may use public transit to travel to and from the Site, based on a Total Person Trip Generation index. As shown in Draft EIR Table IV.J-3, the additional students of the Project are expected to generate approximately 224 morning peak-hour trips, 194 midday trips, and 45 evening peak-hour trips. Using the empirical data collected for the Brentwood School, which is more conservative than the regional data, the Project's person trips equate to 493 trips during the morning peak hour, 427 trips for midday, and 99 trips in the evening peak hour. Using the 3.5 percent mode split suggested in the CMP, the Project would generate approximately 18 transit person trips in the weekday morning, 15 in the midday peak, and 4 new transit person trips in the weekday evening peak hour. The highest person trip value is 18 in the morning peak hour, or approximately one person-trip every 3 minutes during the peak hour.

Metro Lines 2 and 302, and Commuter Express Bus 430 provide transit service in the Project Area along Sunset Boulevard. The closest bus stop to the Project is at the East Campus, located along Sunset Boulevard at Barrington Avenue. During traffic counts conducted for the Project, a maximum of five employees and students used public transportation. With implementation of the Project, the use of public transportation is not expected to increase. The Project location is well served by numerous established transit routes and these trips, if used by East Campus students, would be spread across the commuter network. Moreover, the School operates its own busing program that provides students an alternative to using public transit. As part of the Project (and identified as PDF TR-1), the Applicant will expand its TDM program on the East Campus to include additional busing and carpooling programs on the East Campus to reduce the potential increase in vehicle trips to and from the Campus associated with the increase

in student enrollment. This will likely decrease the Project's potential impacts on public transit.

Based on the calculated number of generated transit trips, the existing and future transit lines serving the site could easily absorb the additional peak-hour trips; therefore, impacts on existing or future transit services in the Project vicinity would be less than significant.

## 5. CMP Analysis

#### Arterial Monitoring Station Analysis

There are no CMP arterial monitoring intersections within the Study Area shown in Draft EIR Figure IV.J-1. The CMP arterial monitoring stations nearest to the Project site include the intersections of:

- Wilshire Boulevard & 26th Street, approximately 2.6 miles southwest of the Project site
- Wilshire Boulevard & Beverly Glen, approximately 3.5 miles southeast of the Project site

Based on the Project trip distribution as shown in Draft EIR Section IV.J, there would be nominal Project trips traveling past these stations during weekday morning, midday, and evening peak hours, far less than the 50-trip threshold for conducting detailed analysis. Therefore, no further analysis is required.

#### Freeway Segment Analysis

The nearest CMP freeway monitoring locations are along I-10 at Lincoln Boulevard (approximately 3.2 miles south of the Project site) and east of Overland Avenue (approximately 3.8 miles southeast of the Project site) and along I-405 north of Venice Boulevard (approximately 4.5 miles south of the Project site) and south of Mulholland Drive (approximately 4.5 miles north of the Project site). However, with total Project trip generation not exceeding 150 trips in one direction during any of the three analyzed peak hours as shown in Draft EIR Table IV.J-3, Project Trip-Generation Volume, and only a small portion of the traffic traveling to the freeway, Project traffic would not exceed 150 trips at any of the freeway monitoring locations during any peak hour.

The Project will not increase study area traffic above the existing level of demand. As such, the Project will not contribute to impacts at CMP arterial monitoring stations.

6. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features TR-1 to TR-10, which are incorporated into the Project and is incorporated into these Findings as though fully set forth herein, would reduce the traffic and circulation impacts of the Project.

# VII. ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The following impact area was concluded by the Draft EIR to be less than significant with the implementation of mitigation measures described in the Final EIR. Based on that analysis and other evidence in the administrative record relating to the project, the City finds and determines that mitigation measures described in the Final EIR reduce potentially significant impacts identified for the following environmental impact categories to below the level of significance.

# A. Geology

# Geologic Hazards - Seismic Ground Shaking

Similar to most of Southern California, the Brentwood School Campuses are in a seismically active area and are subject to some level of damaging ground shaking as a result of movement along the major active (and potentially active) fault zones that characterize this region. Both Campuses lie within five miles of four known active faults; therefore, during the life of the proposed structures, the Brentwood School will most likely experience similar moderate to occasionally high ground shaking from these fault zones, as well as some background shaking from other seismically active areas of the Southern California region. The performance of school buildings and other structures during earthquake shaking is addressed in, and the acceptable level of risk is inherently defined by, the California Building Code ("CBC") requirements. Design and construction in accordance with the CBC and Los Angeles building code ("LABC") requirements would adequately mitigate impacts from ground shaking to less than significant levels.

1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – seismic ground shaking. These project design features were taken into account in the analysis of Project impacts.

2 Mitigation Measures

The City finds that Mitigation Measures GEO-1 and MM GEO-2, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – seismic shaking to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measures GEO-1 and MM GEO-2, impacts related to geologic hazards – seismic shaking are less than significant. No further mitigation measure is required.

### 4. Rationale for Finding

Based on the soils and engineering reports prepared for the Project site, the Project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in these reports with regard to seismic design and other geotechnical issues. More detailed geotechnical investigation reports will be required as part of the normal permitting process prior to issuance of a grading or building permit for each phase to address the specific foundation design. Mitigation Measures MM GEO-1 and MM GEO-2 are recommended to ensure that individual components of the Education Master Plan design plan approval and implementation will include the recommendations contained within the geotechnical and soils investigations to reduce seismic shaking impacts for each phase of the Master Plan.

#### 5. Reference

For a complete discussion of impacts associated with Geologic Hazards – Seismic Ground Shaking, please see Section IV.E of the Draft EIR.

# <u>Geologic Hazards - Shallow Groundwater, Liquefaction, Lateral Spreading, and Settlement</u>

Both Campuses are underlain by dense natural terrace deposits. The Campuses are outside of the areas mapped as potentially liquefiable materials on the State Seismic Hazards Zones Map. Liquefaction and associated lateral spreading and settlement at both Campuses are considered a low risk due to the dense soil composition of less liquefaction-susceptible clayey sand soils.

A potential secondary impact of liquefaction is lateral spread landslides. Lateral spread is a liquefaction-induced landslide of a fairly coherent block of soil and sediment deposits that moves laterally (along the liquefied zone) by gravitational force, sometimes on the order of 10 feet, often toward a topographic low such as a depression or a valley area. The soils at both Campuses are predominantly pebble-gravel, and sand- and silt-clay, and are not considered unstable.

Groundwater can affect structures and subterranean structures if it is at a depth within proximity to floors, walls, and foundations. Effects may include nuisance moisture, seepage causing ponded water, and structural impacts to foundations. Development on both Campuses will be subject to a geotechnical study coordinated with a civil and hydrologic engineering analysis to develop location and structural and soil preparation recommendations adequate for the Project's various development features. Standard geotechnical investigations are required to evaluate the potential to encounter

groundwater at any of the structures, and various design measures are available to provide adequate separation between groundwater levels and the building pads, which would minimize the potential for groundwater to affect the structures.

The potential for liquefaction at the Project site is considered to be low and would be addressed in the final design and geotechnical reports. Therefore, potential liquefaction hazards and impacts related to shallow groundwater are considered less than significant.

Seismic-induced settlement is often caused by loose to medium-dense granular soils becoming more dense during ground shaking. Uniform settlement beneath a given structure would cause minimal damage. However, due to variations in distribution, density, and confining conditions of the soils, seismic-induced settlement is generally non-uniform and can cause serious structural damage. Dry and partially saturated soils, as well as saturated granular soils, are subject to seismic-induced settlement. The soils underlying the Project site are dense and are not considered susceptible to significant seismic-induced settlement.

Implementation of Mitigation Measures MM GEO-1 and MM GEO-2 would ensure that soils encountered during specific soil testing and engineering for all improvements meet requirements for liquefaction, lateral spreading, and settlement and reduce potential impacts to less than potentially significant.

1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement. These project design features were taken into account in the analysis of Project impacts.

2 Mitigation Measures

The City finds that Mitigation Measures GEO-1 and MM GEO-2, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measures GEO-1 and MM GEO-2, impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement are less than significant. No further mitigation measure is required.

4. Rationale for Finding

Based on the soils and engineering reports prepared for the Project site, the Project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in these reports with regard to seismic design and other geotechnical issues. More detailed geotechnical investigation reports will be required as part of the normal permitting process prior to issuance of a grading or building permit for each phase to address the specific foundation design. Implementation of Mitigation Measures MM GEO-1 and MM GEO-2 would ensure that soils encountered during specific soil testing and engineering for all improvements meet requirements for liquefaction, lateral spreading, and settlement and reduce potential impacts to less than potentially significant.

## 5. Reference

For a complete discussion of impacts associated with Geologic Hazards – Shallow Groundwater, Liquefaction, Lateral Spreading, and Settlement, please see Section IV.E of the Draft EIR.

## Geologic Hazards – Expansive and Corrosive Soils

The entire West Campus and a significant portion of the East Campus are located within geologic units designated as Quaternary terrace deposits and older alluvium. The soils consist of pebble-gravel and sand- and silt-clays of Pleistocene age, which are not considered highly expansive. The existence of substantial areas of expansive and corrosive soils has not been documented in the Project area. Slide-prone soils are not found on either Campus. Substantial risks to life and property as a result of expansive or corrosive soil are not anticipated. Nevertheless, the installation of utility lines and the construction of building pads, parking garages, and access driveways would require that soils be engineered for stability. Until specific design recommendations have been made based on engineering and building plans to address any unsuitable or unstable soils, fill has the potential to create future problems of foundation settlement and road or utility line disruption. Implementation of Mitigation Measures MM GEO-1 and MM GEO-2 would ensure that soils encountered during specific soil testing and engineering for all improvements meet requirements for expansive and corrosive soils and reduce potential impacts to less than significant.

# 1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement. These project design features and were taken into account in the analysis of Project impacts.

## 2 Mitigation Measures

The City finds that Mitigation Measures GEO-1 and MM GEO-2, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – expansive and corrosive soils to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measures GEO-1 and MM GEO-2, impacts related to geologic hazards – expansive and corrosive soils are less than significant. No further mitigation measure is required.

4. Rationale for Finding

Based on the soils and engineering reports prepared for the Project site, the Project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in these reports with regard to seismic design and other geotechnical issues. More detailed geotechnical investigation reports will be required as part of the normal permitting process prior to issuance of a grading or building permit for each phase to address the specific foundation design. Implementation of Mitigation Measures MM GEO-1 and MM GEO-2 would ensure that soils encountered during specific soil testing and engineering for all improvements meet requirements for expansive and corrosive soils and reduce potential impacts to less than significant.

5. Reference

For a complete discussion of impacts associated with Geologic Hazards – Expansive and Corrosive Soils, please see Section IV.E of the Draft EIR.

#### Geologic Hazards – Landslides

The East Campus is located in an erosion channel cut into the older alluvium terrace deposits of the Santa Monica Coastal Plain. The Campus has relatively steep slopes on the north, east, and west property lines. The US Geological Survey ("USGS") does not map the East Campus as susceptible to earthquake-induced landslides. However, the State of California Seismic Hazards Zone Map shows slopes in the northeasterly and southeasterly portion of the East Campus are mapped within the Earthquake-Induced Landslide Zone and have a potential for earthquake-induced landslides. The mapped slopes are located closest to the proposed Upper School Arts Building and Upper School Gymnasium. Development of either proposed structure would require slope stability analyses and, if necessary, design of permanent grading and retaining walls to remove the potential for slope instability. Once permitted by the local review agency and built per approved geotechnical/geological recommendations as part of the building permit process, the slopes would be graded to provide an appropriate factor of safety as determined by the Project geotechnical engineer during the design. As such, the risk of

landslides affecting the East Campus is considered to be low and impacts would be less than significant.

The West Campus is a relatively flat site with two steps in grade running in the north/south direction. According to the State of California Seismic Hazard Zones Map—Beverly Hills Quadrangle, the West Campus is not located within a "Zone of Required Investigation for Earthquake-Induced Landslides." Because the risk of landslides affecting the West Campus is considered to be low, impacts would be less than significant.

Additionally, as recommended in Mitigation Measure MM GEO-1, individual components within each phase of the Education Master Plan would be subject to the recommendations contained within the geotechnical and soils investigation necessary for each specific development project of the Master Plan, further reducing the potential impact.

1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement. These project design features were taken into account in the analysis of Project impacts.

2 Mitigation Measures

The City finds that Mitigation Measure GEO-1, which is incorporated into the Project and incorporated into these Findings as set forth herein, reduces the impacts related to geologic hazards – landslides to less than significant. This mitigation measure was taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measure GEO-1, impacts related to geologic hazards – landslides are less than significant. No further mitigation measure is required.

4. Rationale for Finding

Based on the soils and engineering reports prepared for the Project site, the Project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in these reports with regard to seismic design and other geotechnical issues. More detailed geotechnical investigation reports will be required as part of the normal permitting process prior to issuance of a grading or building permit for each phase to address the specific foundation design. As recommended in Mitigation Measure MM GEO-1, individual components within each phase of the Education Master Plan would be subject to the recommendations contained within the geotechnical and

soils investigation necessary for each specific development project of the Master Plan, further reducing the potential impact.

5. Reference

For a complete discussion of impacts associated with Geologic Hazards – Landslides, please see Section IV.E of the Draft EIR.

#### Geologic Hazards - Sedimentation and Erosion

The removal of vegetation and other soil-stabilizing features during Project construction could accelerate wind- and water-driven erosion of soils that would increase sedimentation during storm events.

As part of the Education Master Plan, each specific component would adhere to conditions under the NPDES permit set forth by the Los Angeles Regional Water Quality Control Board ("LARWQCB"), would prepare and submit a SWPPP, and would be required to have SUSMP, as described in Draft EIR Section IV.E, Hydrology and Water Quality. The SWPPP would incorporate best management practices ("BMPs") to ensure that potential water quality impacts during construction from erosion would be reduced to less than significant. Typical BMPs will ensure grading is conducted during dry-weather conditions, moister control of exposed soils to prevent wind erosion when temporarily disturbed, coverings for temporary stockpiles, sandbagging, etc. Once land disturbance and construction is completed in each phase of the Project, landscaping, non-erosive drainage features, and maintenance will be conducted over the long-term operations of the Project in compliance with the Project's SUSMP. The SUSMP will include BMPs that would reduce on-site erosion from vegetated areas of the Project site.

All grading activities will require grading permits from LADBS, and subject to requirements and standards designed to limit potential impacts to acceptable levels. In addition, 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 fill. Therefore, with implementation of Regulatory Compliance Measures RCM GEO-1 and RCM GEO-2 and Mitigation Measures MM GEO-1 through MM GEO-4, potential sedimentation and erosion impacts will be reduced to a less than significant level.

1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features GEO-1 to GEO-4 and Regulatory Compliance Measures RCM GEO-1 to GEO-3, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to geologic hazards – shallow groundwater, liquefaction, lateral spreading and settlement. These project design features were taken into account in the analysis of Project impacts.

2 Mitigation Measures

The City finds that Mitigation Measures MM GEO-1 through MM GEO-4, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduces the impacts related to geologic hazards – sedimentation and erosion to less than significant. These mitigation measures were taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measures MM GEO-1 through MM GEO-4, impacts related to geologic hazards – sedimentation and erosion are less than significant. No further mitigation measure is required.

4. Rationale for Finding

Based on the soils and engineering reports prepared for the Project site, the Project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in these reports with regard to seismic design and other geotechnical issues. More detailed geotechnical investigation reports will be required as part of the normal permitting process prior to issuance of a grading or building permit for each phase to address the specific foundation design. Implementation of Regulatory Compliance Measures RCM GEO-1 and RCM GEO-2 and Mitigation Measures MM GEO-1 through MM GEO-4, will reduce potential sedimentation and erosion impacts to a less than significant level.

## 5. Reference

For a complete discussion of impacts associated with Geologic Hazards – Sedimentation and Erosion, please see Section IV.E of the Draft EIR.

# B. Traffic and Circulation

The East Campus enrollment is 695 students. As part of the Project, the maximum enrollment on the East Campus would be increased from 695 to 960 (265 new students). This increase would be phased in over four years as new facilities are added during Phase I of the Project to create the capacity to accommodate additional students. It is expected that the enrollment phase-in would be completed by 2020. This increase would consist of 6th grade students relocated from the West Campus to the new East Campus Middle School facilities, as well as additional 7th through 12th grade students. The West Campus enrollment would remain at 300 students and, for this reason, no changes to West Campus traffic would occur.

Trip generation estimates, trip distribution patterns, and trip assignments were prepared to determine the impacts of the Project. The hours of operations and activities and events, would not change. Many of these activities and events do not attract many visitors, while those activities and events that do attract a material number visitors, such as plays, lectures, and Back to School Night, occur at or after 7:00 P.M. and, therefore,

do not significantly add to peak-hour traffic. The number of activities and events would not increase under the Project nor would the hours of the activities and events change; however, the total numbers of guests at the East Campus activities and events would increase nominally in proportion to students that would be added to the East Campus following completion of Phase I.

Trip generation estimates were developed for the total arriving and departing traffic volumes on a daily basis for A.M., midday, and P.M. peak hours.

The most recent trip generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012) for Land Use Codes 536 (Private School) were used to develop the Project trip generation estimates. As shown in Draft EIR Table IV.J-3, Project Trip Generation Volume, the increase of 265 students at the East Campus is anticipated to generate 224 trips during the A.M. peak hour (with 61 percent entering and 39 percent exiting), 194 trips during the midday peak hour (with 42 percent entering and 48 percent exiting), and 45 trips during the P.M. peak hour (with 43 percent entering and 57 percent exiting).

The trip distribution pattern for traffic entering and exiting the East Campus was primarily developed based on zip code demographics provided for students and staff. Percentage splits at Project intersections were based on traffic counts conducted at East Campus access points at South Barrington Place east of Sunset Boulevard and at South Barrington Place and Chayote Street.

Project traffic was assigned to the surrounding street system based on the following external distribution patterns: approximately 15 percent of the traffic was assigned to and from the north, 27 percent was assigned to and from the east, 30 percent was assigned to and from the south, and 28 percent was assigned to and from the west.

The distribution of Project traffic through the study intersections is provided in Draft EIR Figure IV.J-5a. and 5.b, Trip Distribution A.M. Peak Hour (morning peak hour) and Draft EIR Figure IV.J-6a and 6.b, Trip Distribution Midday and P.M. Peak Hours (midday and evening peak hours). The trip distribution for Project traffic is shown in Draft EIR Figure IV.J-7a and IV.J7b, Project-Only Intersection Peak-Hour Traffic Volumes.

#### Intersection Levels of Service: Existing with Project

LOS summaries for Existing with Project conditions during the weekday A.M., midday, and P.M. peak hours are shown in Draft EIR Figures IV.J-8a and IV.J.8b, Existing with Project Conditions (Year 2014) Intersection Peak-Hour Traffic Volumes. As provided in Draft EIR Table IV.J-4, Existing with Project (Year 2014) Signalized Intersection Peak-Hour Levels of Service, the Existing Conditions with Project scenario indicates that Project traffic would result in increases in the volume to capacity ("V/C") ratios at 12 of the 14 Study Area intersections during at least one peak-hour period.

As shown in Draft EIR Table IV.J-4, the Project would result in significant impacts at four study intersections during the following peak hours:

- 5. South Barrington Place & Sunset Boulevard (midday peak hour)
- 6. Church Lane & Sunset Boulevard (morning peak hour)
- 13. Montana Avenue & Barrington Avenue (evening peak hour)
- 14. San Vicente Boulevard/Federal Avenue & Wilshire Boulevard (midday peak hour)

#### Project Access Driveways – East Campus

As discussed in Draft EIR Section II, Project Description, the main access to the East Campus will be provided from a new entrance on Barrington Place, approximately 300 feet farther from the intersection with Sunset Boulevard and 250 feet closer to the intersection with Chayote Street. Installing a new driveway on Barrington Place farther from Sunset Boulevard and restriping Barrington Place as shown on Figure IV.J-4, Barrington Place Conceptual Striping Plan, would improve circulation, queuing, traffic flow, and provide refuge for left-turning vehicles entering the Campus, which is a benefit to the congestion experienced at the intersection of South Barrington Place and Sunset Boulevard. The existing curb cut will remain, but it will only be used for emergency access or occasional oversized vehicle uses.

As shown in Draft EIR Table IV.J-5, Existing with Project Conditions (Year 2014) Project Driveway Intersections Peak-Hour Level of Service, the East Campus main driveway access intersection at Barrington Place would operate at LOS D or better, and secondary access at the intersection of Barrington Place and Chayote Street would operate at LOS E during the morning peak hour under the existing with project traffic conditions. As such, the Project would result in a potentially significant impact prior to mitigation.

#### Construction Impacts

Construction would occur in four phases for each Campus, involving the demolition of existing on-site uses; excavation and excess soil removal during grading; construction of parking structures, new buildings, and related grounds; and building improvements. These construction activities would occur on site with minimal intrusion into public streets.

At the East Campus, some in-street construction activity would occur at the main entrance at Barrington Place where the new driveway would be installed, involving temporary curb and sidewalk removal and repaving to complete the connection. At the West Campus, some in-street construction activity would occur at the main entrance at Bundy Drive and the secondary entrance at Saltair Avenue for the driveway improvements providing access to the on-site parking garages. The Saltair Avenue side would also include construction of a turnout area for temporary drop-off and pickup. This would involve temporary curb and sidewalk removal and repaving to complete these connections as well.

All construction equipment and truck staging would occur on site; no off-site staging, including on public streets, would be allowed. Detours around either Campus would not be required.

Construction workers for the East Campus would park on site in designated areas. Construction workers for the West Campus would park on the East Campus or other offstreet locations and travel via shuttle to the West Campus, so as to minimize the construction traffic on Sunset Boulevard and near the West Campus residential areas. No lane closures with temporary loss of on-street parking and pedestrian access or loss of bus stops would occur. Up to four on-street parking spaces would be lost permanently due the new East Campus main access driveway installation. Potential instreet construction impacts are considered potentially significant. Mitigation Measure MM TR-2, which requires the Project to coordinate with LADOT and develop a construction management plan, would reduce potential impacts to less than significant.

Construction worker traffic would depend on the level of effort during various construction phases, as well as the mode and time of travel of the workers. Based on the construction schedule, there will be between 15 and 147 workers per day for the busiest construction activity on the East Campus, which will occur in Phase 1. By applying an average vehicle ridership (AVR) of 1.135, as provided in CEQA Air Quality Handbook, and a maximum of 147 workers, the highest expected number of daily trips due to construction workers is 130 inbound and 130 outbound trips on a daily basis. The West Campus construction during Phase 1 and 3 would require a total of 58 workers, which equates to 51 trips in and 51 trips out based on the AVR. Since construction worker trips will occur outside of the peak hours and is a temporary activity, impacts would be less than significant.

#### Hauling Activity:

#### East Campus

The period of heaviest demolition and excavation would occur during Phase 1, with approximately 19,650 cy of export material, and is expected to last approximately 40 work days. If the School elects to construct a regulation-size athletic field for the Middle School Athletic Field, there would be approximately an additional 5,500 cy of soil excavated and exported, for a total of approximately 25,150 cy.

By utilizing haul trucks with a conservative capacity of approximately 14 cy ("cy"), approximately 1,404 haul trips from the Project site would be required over the span of the construction phase. To remain conservative, the analysis is based on a five-day

work week (with 40 working days). Accordingly, an average of approximately 35 haul trucks would leave the Project site per day. This 35-haul trip average corresponds to 70 daily truck trips (inbound and outbound) spread throughout the day during the construction phase with the most haul activity. On an average hourly basis, with a uniform distribution of trips over a 5-1/2-hour workday (to avoid peak hours), these daily trip totals would translate to approximately 12 trips per hour (six inbound and six outbound).

Using regionally acceptable standards, a passenger car equivalency ("PCE") of 2.0 was applied to equate larger trucks to passenger vehicles during the peak hours. Transportation Research Circular No. 212 (Transportation Research Board, 1980) defines PCE for a vehicle as the number of through moving passenger cars to which it is equivalent based on the vehicle's headway and delay-creating effects. Table 8 of the Transportation Research Circular No. 212 and Exhibit 16.7 of the 2000 Highway Capacity Manual (Transportation Research Board, 2000) suggests a PCE of 2.0 for trucks. The 12 truck trips, therefore, equate to 24 passenger vehicle trips, all of which would occur outside of the peak hours.

As it has in the past, the School is seeking permission from the VA to allow construction vehicles, including haul and delivery trucks, to access the East Campus through the VA property. Such vehicles would exit the East Campus onto the VA property via a gate near the south parking lot, travel through the VA property, and exit the VA property at Sepulveda Boulevard or Wilshire Boulevard. Haul trucks would continue onto the I-405 and proceed north or south, depending on where the soil will be deposited (e.g., fill site or landfill for use as daily cover). This would obviate the need for construction vehicles to travel on Sunset Boulevard, Barrington Place, and other nearby streets.

If for some reason the VA access is not available, outbound haul trucks would exit the Project site onto Barrington Place, proceed east on Sunset Boulevard to the I-405, and then proceed north or south as stated previously. In either case, inbound trucks would travel in the opposite direction. The East Campus Haul Routes are depicted in Draft EIR Figure II-18, East Campus Haul Routes. As set forth in Project Design Feature PDF TR-6, all heavy truck hauling of construction equipment, construction materials deliveries, and excess soil export shall be limited to the hours between 9:00 A.M. and 2:30 P.M. to avoid both the A.M. and P.M. peak-hour commuter traffic periods.

#### West Campus

The period of heaviest demolition and excavation would occur during Phase 1, with approximately 12,500 cy of export material, and is expected to last approximately 20 work days. By utilizing haul trucks with a conservative capacity of 14cy, approximately 893 haul trips from the West Campus would be required over the span of the construction phase. To remain conservative, the analysis is based on a five-day work week (with 20 working days). Accordingly, an average of approximately 45 haul trucks would leave the West Campus per day.

This 45 haul trip average corresponds to 90 daily truck trips (inbound and outbound) spread throughout the day during the construction phase with the most haul activity. On an average hourly basis, with a uniform distribution of trips over a 5-1/2 hour workday (to avoid peak hours), these daily trip totals would translate to approximately 16 trips per hour (eight inbound and eight outbound). Adjusted to PCE, this equates to 32 passenger vehicle trips, all of which would occur outside of the peak hours.

Excavated material from West Campus development would be hauled by trucks off the Project site to fill sites or to a landfill for use as daily cover. As illustrated in Figure II-19, West Campus Haul Routes, there are two alternative haul routes proposed. Under the first, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed east on Sunset Boulevard to I-405 and then proceed north or south, depending on where the soil will be deposited. Inbound trucks would travel the reverse route from the I-405 then proceed west on Sunset Boulevard to either Bundy Drive or Saltair Avenue. Under the second, trucks exiting the West Campus from Bundy Drive or Saltair Avenue would proceed west on Sunset Boulevard and proceed south on Kenter Avenue to Bundy Drive to San Vicente Boulevard to Wilshire Boulevard to the I-405 and then proceed north or south, depending on where the soil will be deposited. Inbound trucks would travel the reverse route from the I-405 to Wilshire Boulevard to San Vicente Boulevard to Bundy Drive to Kenter Avenue, then proceed east on Sunset Boulevard to either Bundy Drive or Saltair Avenue. This alternative haul route would be used as needed to avoid potential conflicts with the Archer Forward project (Related Project No.11) or other constructionrelated activity on Sunset Boulevard.

All heavy truck hauling of construction equipment, construction materials deliveries, and excess soil export shall be limited to the hours between 9:00 A.M. and 2:30 P.M. to avoid both the A.M. and P.M. peak-hour commuter traffic periods. Since construction haul truck trips would occur along major roadways and outside of the peak hours, truck hauling activities would be less than significant.

<u>Peak-Hour Intersection Impacts</u>: The construction worker trips and haul truck trips, as summarized previously, would all occur outside peak commute periods. Therefore, potential temporary impacts associated with construction traffic are considered to be less than significant at study area intersections. Furthermore, the Applicant shall develop and implement a construction traffic management plan to further reduce potential impacts.

<u>Bus/Transit Impacts</u>: No bus/transit routes are affected by the construction activity since all workers and trucks will park on site, or if needed, at a satellite location, and would, therefore, not experience a temporary loss of bus stops or rerouting of bus lines. As such, bus/transit impacts are considered to be less than significant.

<u>On-Street Parking Impacts</u>: Construction activities will occur on site, with staging of vehicles also occurring on site. As discussed previously, the new driveway on Barrington Place near Sunset Boulevard will result in removal of up to four metered on-

street parking spaces and possibly P.M. peak-hour restrictions for up to seven other spaces.

Design plans, traffic control plans, and detour plans for in-street construction activities on Barrington Place will be submitted for permit and approval. It is expected that temporary displacement and routing of vehicles outside the peak hours will be required on this section of Barrington Place while lane restriping is conducted.

With the construction management plan, the off-peak arrival and departure of construction-related vehicles, and other construction management practices described previously, construction traffic impacts would be less than significant.

#### Cumulative Impacts

<u>Future 2020 Conditions with Project</u>: The Project traffic volumes described previously and as shown in Figure IV.J-7 were added to the Future Without Project traffic volumes shown in Figure IV.J-9a and 9.b. The resulting Future with Project peak-hour traffic volumes are provided in Figures IV.J-10a and 10b, Future with Project Conditions (Year 2020) Intersection Peak-Hour Traffic Volumes. These volumes are the sum of the existing traffic volumes, ambient growth, related Project traffic, and Project-only traffic, and represent Future With Project conditions.

The intersection capacity was analyzed to evaluate the V/C relationships and LOS characteristics at each study intersection. As shown in Draft EIR Table IV.J-9, Future (2020) with Project Signalized Intersection Peak-Hour Levels of Service, application of the City's significant impact criteria to the Future With Project scenario indicates that the Project traffic would result in a significant impact at the following three study intersections during the following peak hours:

- 6. Church Lane & Sunset Boulevard (morning peak hour)
- 8. I-405 Northbound On/Off Ramp & Sunset Boulevard (morning peak hour)
- 13. Montana Avenue & Barrington Avenue (evening peak hour)

According to LADOT, these intersections are currently constructed to their maximum lane capacity and are updated with detector loops, video cameras, and signal controller boxes. As such, no physical mitigation or improvements are available to further improve the LOS at these impacted intersections.

#### Project Access and Circulation:

#### East Campus

The main access to the East Campus will be via a new entrance on South Barrington Place, approximately 300 feet east of Sunset Boulevard and 250 feet north of Chayote

Street. The secondary access driveway would remain at its current location and be used for emergency access and occasional oversized vehicles only.

As shown in Draft EIR Table IV.J-10, Future with Project Conditions (2020) Project Driveway Intersections Peak-Hour Levels of Service, the East Campus main driveway access intersection at South Barrington Place would operate at LOS D or better during all peak hours. The secondary access driveway at the intersection of Barrington Place and Chayote Street would operate at LOS E during the A.M. peak hour under the Future with Project traffic condition. This would result in a potentially significant impact prior to mitigation.

#### West Campus

The Saltair Avenue parking lot is currently used for pick-up and drop-off for employee childcare and faculty parking. Once the Project's Saltair Annex building is completed, vehicular pick-up and drop-off for the employee childcare facility will still be accommodated along Saltair Avenue using the four parking spots that will be included in the Project for that purpose.

However, the faculty parking would be relocated to the parking garage under the Arts and Athletic Building, which would be accessed via the driveway on Bundy Drive. The faculty generally arrives at the Campus prior to the A.M. peak-hour drop-off period for the elementary school students, which generally occurs between 7:45 A.M. and 8:15 A.M. (gates lock at 8:25 A.M.). Faculty generally leaves the Campus after the P.M. peak-hour pickup ends, which is generally between 2:30 P.M. and 3:00 P.M. Therefore, this shift in vehicular access from Saltair Avenue to Bundy Drive involves faculty only, avoids other peak timeframes, and would have a marginal increase in the vehicles accessing the Campus along Bundy Drive. These faculty vehicles are already on the roadway network for the existing condition and will not result in significant impacts to off-site intersections after the Project is built. Therefore, the Project would have a less than significant impact on the operations of the circulation around the Campus, the parking garage driveway, and Bundy Drive.

<u>Construction Impacts</u>: As shown in Draft EIR Figure III-1, Related Projects Map in Section III, Environmental Setting and Related Projects, of the Draft EIR, with the exception of the Archer Forward project, none of the related projects is located in close proximity to the Project site and may or may not be developed within the same construction schedule as the Project. In addition, per standard City practice, the construction of large development projects would occur in accordance with project-specific construction management plans, as is the case with the Project. As construction management plans are reviewed and approved by LADOT, it is anticipated that through this process, LADOT would coordinate construction activities among the projects that would have the potential to result in cumulative intersection impacts.

The EIR for the Archer Forward project found that the Archer Forward project would result in significant temporary construction traffic impacts due to hauling activities in the A.M. peak hour and construction worker traffic in the P.M. peak hour. The Project's Draft EIR expressly considered the potential cumulative impacts due to overlapping construction activities between the Archer Forward project and Phase I of the East Campus under the Brentwood School Project or Phase I of the West Campus if the Archer Forward project is delayed. The analysis in the Draft EIR assumed the Archer Forward project would use the three-year construction schedule identified in the Archer EIR. It is possible that there may be some However, the Project's construction traffic would occur outside of the peak hours pursuant to Project Design Features PDF TR-6 and PDF TR-7. Moreover, pursuant to Project Design Feature PDF TR-5, if permitted by the VA construction traffic would access the East Campus via the VA property and thus would not travel on streets in the vicinity of the Archer Forward project. . In the event of overlapping construction between the West Campus development and the Archer Forward project (or the Mount St. Mary's project or another project) the West Campus construction traffic would use the identified alternative haul route to avoid any potential cumulative impacts. Therefore, the Project's contribution to the temporary construction impact on intersections would not be cumulatively considerable.

The EIR for the Archer Forward project also concluded that the Archer Forward project would result in a significant temporary street segment impact during construction on Chaparal Street between Barrington Avenue and Westgate Avenue. Chaparal Street is a relatively short local street north of Sunset that provides access to the Archer School for Girls. As it does not provide a convenient route to or from the East Campus, the Project's construction vehicles would have no reason to travel on Chaparal. Moreover, the Project's construction traffic (both East and West Campus) would use designated routes that avoid local streets, including Chaparal. Therefore, the Project's contribution to the temporary construction segment impact on Chaparal would not be cumulatively considerable.

The Project's construction activity would require parking for construction workers to occur on site, which involves shuttling workers from the East Campus or other off street parking areas to the West Campus for drop-off and pick-up. Therefore, the Project would not contribute to any cumulative temporary construction traffic parking in the area, and impacts would be less than significant.

1. Project Design Features and Regulatory Compliance Measures

The City finds that Project Design Features TR-1 to TR-10, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to traffic and circulation (intersection operational impacts, driveway access and construction traffic). These project design features were taken into account in the analysis of Project impacts.

2 Mitigation Measures

The City finds that Mitigation Measures TR-1 and TR-2, which are incorporated into the Project and incorporated into these Findings as set forth herein, reduce the impacts related to transportation and circulation (intersection operational impacts, driveway access and construction traffic) to less than significant. These mitigation measures were taken into account in the analysis of Project impacts.

3. Finding

With implementation of the Mitigation Measures TR-1 and TR-2, impacts related to transportation and circulation (intersection operational impacts, driveway access and construction traffic) are less than significant. No further mitigation measure is required.

4. Rationale for Finding

<u>Intersection Operational Impacts</u>: The zero traffic growth as required by Mitigation Measure MM TR-1 would, by definition, result in no new peak-hour Project trips at offsite intersections, thereby fully mitigating Project-specific and cumulative operational impacts at all study intersections.

<u>Driveway Access</u>: With the Project's TDM program to achieve zero net trips, the LOS at the secondary access driveway at the intersection of Barrington Place and Chayote Street would be improved to pre-Project conditions. The Project-specific and cumulative impact would be reduced to less than significant.

<u>Construction Traffic</u>: Implementation of Mitigation Measure MM TR-2, in addition to Project Design Features PDF TR-6 and PDF TR-7, respectively requiring an LADOT-approved CMP and hour limitations, would reduce potential Project-specific and cumulative construction traffic impacts to less than significant.

5. Reference

For a complete discussion of impacts associated with Traffic and Circulation, please see Section IV.J of the Draft EIR.

## IX. ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The Project results in the following impacts, which are found to be significant and unavoidable.

## A. Noise - Construction Vibration (Project Specific and Cumulative)

#### Project Specific

Ground vibrations from construction activities very rarely reach the levels that can damage structures, but they can achieve the audible range and be felt in buildings close to the site. The primary and most intensive vibration source associated with the development of the Project would be the use of larger bulldozers and excavators. The

Project would not use pile drivers or vibratory rollers, which generally produce higher levels of noise and vibration than other types of equipment.

Vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Draft EIR Table IV.I-15, Vibration Source Levels for Construction Equipment, lists vibration source levels for construction equipment ("VdB").

As indicated in Draft EIR Table IV.I-15, large bulldozers are capable of producing approximately 87 VdB (or 0.022 inches per second) at 25 feet, which diminishes rapidly to 78 VdB (or 0.008 inches per second) at 50 feet, and 69 VdB (or 0.003 inches per second) at 100 feet.

Land uses surrounding the Campus consist mostly of residential and institutional uses. High noise-producing (and vibration-producing) activities during construction would be scheduled to occur between the hours of 8:00 A.M. and 4:00 P.M. to minimize disruption on sensitive uses.

Residence R7 along the Layton Drive side of the East Campus is the nearest vibrationreceptor to construction activities on the East Campus and would be approximately 50 feet from these activities. Residence R7 near the East Campus would experience 78 VdB, or 0.008 inches per second, which is less than the building damage vibration standard of 106 VdB or 0.2 inches per second for non-engineered timber and masonry buildings. High noise-producing (and vibration-producing) activities during construction would be scheduled to occur between the hours of 8:00 A.M. and 4:00 P.M. to minimize disruption to sensitive uses. However, given that vibration levels could exceed the Category 2 human annoyance standard of 72 VdB, it is considered that the temporary and intermittent vibration impacts at Residence R7 would be potentially significant.

Residence R1 along Saltair Avenue and R7 along the Bundy Drive side of the West Campus are the nearest vibration-sensitive receptors to construction activities on the West Campus and would be approximately 110 feet from these activities. Vibration levels at Residences R1 and R7 near the West Campus would experience temporary vibration levels of 69 VdB or 0.003 inches per second, which is less than the building damage vibration standard of 106 VdB or 0.2 inches per second for non-engineered timber and masonry buildings, as well as the Category 2 human annoyance standard of 72 VdB. Construction vibration impacts at these residences from on-site construction activities would be less than significant.

The levels of ground vibration generated by typical truck traffic vary depending on the road surface conditions and the truck payload. Road surfaces with potholes and speed bumps generate higher levels of vibration forces. Similarly, a heavy and fully loaded truck tends to cause higher level of vibration forces than a lightweight truck. Based on Federal Transit Administration ("FTA") data, the vibration generated by a haul truck traveling on a smooth road would be approximately 0.00566 PPV or 63 VdB at a

distance of 50 feet from the truck, while the vibration generated by a haul truck traveling over a pothole or bump would be approximately 0.01529 PPV or 72 VdB at a distance of 50 feet from the truck. The highest estimated vibration levels for haul trucks traveling over potholes and bumps at the estimated vibration levels generated by haul trucks would be below the significance threshold of 0.20 PPV for building damage. Therefore, vibration impacts associated with potential building damage during Project construction activities would be less than significant. However, with regard to human annoyance, the vibration levels at the sensitive uses along the haul routes could be up to 85 VdB. These estimated vibration levels would exceed the Category 1 criteria of 65 VdB for human annoyance at the vibration-sensitive land uses, as well as the Category 2 criteria of 72 VdB, if the trucks travel over a pothole or a bump. Therefore, the vibration levels generated by haul trucks at the haul route locations with respect to human annoyance during construction hauling is considered to be potentially significant.

## <u>Cumulative</u>

Ground-borne vibration decreases rapidly with increases in distance. Potential vibration impacts due to construction activities are generally limited to buildings and structures that are located close to the construction site, within 100 feet from the heavy construction equipment. The nearest related project, the Archer Forward project, is approximately 600 feet from the East Campus and 950 feet from the West Campus. Therefore, cumulative vibration impacts associated with potential concurrent on-site construction activities from development of the Education Master Plan and the related projects would be less than significant.

It is possible that some construction activities could overlap and utilize the same haul route along Sunset Boulevard, causing cumulative vibration impacts. The Project is conservatively considered to result in a significant impact with regard to vibration from haul trucks and construction traffic under the human annoyance threshold. Therefore, it is conservatively concluded that cumulative impacts with regard to vibration from haul trucks and construction traffic would also be significant, to the extent the construction activities overlap and the Project utilizes the same routes for construction truck traffic.

1. Project Design Features

The City finds that Project Design Features N-1 to N-3, which are incorporated into the Project and incorporated into these Findings as fully set forth herein, reduce the potential construction vibration impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

2. Mitigation Measures

The City finds that there are no feasible mitigation measures to reduce the potentially significant Project-specific and cumulative construction vibration impacts.

# 3. Findings

The City finds that changes and alterations and mitigation measures were made to the Project to reduce the significant construction vibration impacts of the Project. No additional measures are available to reduce these impacts to less-than-significant levels.

# 4. Rationale for Findings

The Project is considered to have a temporary significant vibration impact with regard to human annoyance from on-site construction activities. However, due to the attenuation characteristics of ground-borne vibration, cumulative vibration impacts from on-site construction would be less than significant. Project-related vibration impacts from off-site construction trucks would have a less than significant impact with respect to building damage, but are considered to have a temporary and intermittent, but significant and unavoidable impact with regard to human annoyance. Cumulative noise impacts from construction traffic would also be significant if construction of the Project overlaps with the Archer Forward project and construction traffic from the two projects uses the same routes.

# 5. Reference

For a complete discussion of impacts associated with Noise, please see Section IV.I of the Draft EIR.

## B. Noise – Cumulative Construction

Most of the related projects are located a far enough distance from the East and West Campuses such that there is no potential for cumulative noise impacts. The nearest related project (the Archer Forward project) is located approximately 600 feet from the East Campus and 950 feet from the West Campus. It is possible that some construction activities could overlap. However, due to the distance from the Archer Forward project to the Campuses, intervening structures, and landscaping, and the high ambient noise levels along Sunset Boulevard, construction noise from the Archer Forward project would not have the potential to combine with Project construction noise to cause increase noise levels at the majority of the sensitive receptors in the area. Exceptions to this could include sensitive receptor locations at 110 N. Barrington Avenue and 11700 Barrington Court, where the Archer Forward project would increase noise levels and which are in close enough proximity to the East Campus such that the Brentwood Education Master Plan Project could contribute to a combined noise impact if construction of the two projects overlaps. Therefore, the Project's construction noise impact, in conjunction with the related projects, is considered to be cumulatively considerable and significant.

Construction traffic would access the East Campus via the VA property. If for some reason this route were to become unavailable, construction traffic would use Sunset

Boulevard to and from the I-405. West Campus construction traffic would also use Sunset Boulevard to and from the I-405, provided, however, that construction trucks would use Sunset Boulevard, Kenter Avenue, Bundy Drive, and San Vicente Boulevard under an alternate route. This alternate route would be used, if necessary, to avoid concurrent haul activity on the same streets as the Archer Forward project, which has proposed four different haul route options, only one of which would primarily use Sunset Boulevard. Therefore, it is not expected that the construction traffic from both projects would travel on the same streets at the same time. Nonetheless, it is conservatively considered that cumulative impacts with regard to temporary noise from haul trucks and other construction traffic are significant to the extent that the construction activities overlap in the unlikely event that Project utilizes the same routes for construction truck traffic.

1. Project Design Features:

The City finds that Project Design Features N-1 to N-3, which are incorporated into the Project and are incorporated into these Findings as though fully set forth herein, would reduce the potential noise impacts of the Project. These Project Design Features were taken into account in the analysis of potential impacts.

2. Mitigation Measures

The City finds that there are no feasible mitigation measures to reduce the potentially significant the cumulative construction-related noise, which would remain significant and unavoidable.

3. Findings

Due to the distance from the Archer Forward project to the Campuses, intervening structures, and landscaping, and the high ambient noise levels along Sunset Boulevard, construction noise from the Archer Forward project would not have the potential to combine with Project construction noise to cause increased noise levels at the majority of the sensitive receptors in the area. Exceptions to this could include sensitive receptor locations at 110 N. Barrington Avenue and 11700 Barrington Court, where the Archer Forward project would increase noise levels and which are in close enough proximity to the East Campus such that the Brentwood Education Master Plan Project could contribute to a combined noise impact if construction of the two projects overlaps. Therefore, the Project's construction noise impact, in conjunction with the related projects, is considered to be cumulatively considerable and significant.

4. Rationale for Findings

Through compliance with Section 41.40 of the LAMC and implementation of the Project Design Features, which would require the implementation of noise reduction devices and techniques during construction at the Project site, all surrounding residential and

institutional properties would not experience temporary increases over existing noise levels of 10 dB(A) lasting more than one day or an increase over existing noise levels by 5 dB(A) lasting more than 10 days. Therefore, Project-specific construction-related noise impacts associated with the Project would be less than significant. However, the Project could contribute to a temporary but cumulatively considerable noise impact identified for the Archer Forward project, if construction of the two projects overlaps.

# 5. Reference

For a complete discussion of impacts associated with Noise, please see Section IV.I of the Draft EIR.

# X. ALTERNATIVES TO THE PROJECT

In addition to the project, the Draft EIR evaluated a reasonable range of six alternatives to the project. These alternatives are: (1) Alternative 1 - No Project Alternative; (2) Alternative 2 - Reduced Student Enrollment Increase; (3) Alternate 3 - Alternative Site Plans, East Campus; (4) Alternative 4 - Reduced Square Footage of Development, East Campus; (5) Alternative 5 - Reduced Square Footage of Development, West Campus; and (6) Alternative 6 - Reduced Square Footage of Development, East and West Campuses Combined. In accordance with CEQA requirements, the alternatives to the project include a "No Project" alternative and alternatives capable of eliminating the significant adverse impacts of the project. These alternatives and their impacts, which are summarized below, are more fully described in section V of the Draft EIR.

## A. Summary of Findings

Based upon the following analysis, the City finds, pursuant to CEQA Guidelines section 15096(g)(2), that none of the alternatives or feasible mitigation measures within its powers would substantially lessen or avoid any significant effect the project would have on the environment.

## B. Project Objectives

An important consideration in the analysis of alternatives to the project is the degree to which such alternatives would achieve the objectives of the Project. As more thoroughly described in the Draft EIR Section II, Project Description, both the City and Applicant have established specific objectives concerning the project, which are incorporated by reference herein and discussed further below.

# C. Project Alternatives Analyzed

## 1. Alternative 1 - No Project Alternative

The No Project Alternative is assessed in accordance with CEQA Guidelines, Section 15126.6(e). This alternative considers what would be reasonably expected to occur in

the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. The Campuses would continue as is without the Project improvements. The East Campus and West Campus would continue to operate within the existing facilities. There would be no enrollment increase on the East Campus.

<u>Impact Summary</u>: The No Project Alternative is assessed in accordance with CEQA Guidelines, Section 15126.6(e). This alternative considers what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services. The Campuses would continue as is without the Project improvements. The East Campus and West Campus would continue to operate within the existing facilities. There would be no enrollment increase on the East Campus.

<u>Findings</u>: This Alternative would avoid the Project's temporary construction vibration impacts under the human annoyance standard, as well the Project's contribution to unavoidable significant cumulative impacts from construction noise if construction overlaps with the Archer Forward project, and from construction vibration along the haul routes if construction overlaps and the Project is unable to use the VA Property for construction vehicle access to and from to the East Campus. Alternative 1 would also avoid the Project's impacts with respect to geology and transportation and circulation, which are less than significant with mitigation.

The alternative's impacts with respect to air quality, light and glare impacts, hazards and hazardous materials, noise, historical resources, land use and planning, hydrology, water utility services, waste water, and solid waste would be less than the Project's less than significant impacts. However, this alternative would not result in implementation of the Project's GHG-reducing features and would not achieve at least a 16 percent break from BAU. Therefore, impacts from GHG emissions would be greater than the Project and significant. Further, due to the loss of beneficial aspects associated with the Project, overall land use impacts would be greater than under the Project.

Under this alternative, the Project Design Feature to relocate the driveway on Barrington Place farther from Sunset Boulevard and to restripe Barrington Place, which would improve circulation, queuing, traffic flow, and provide a refuge for left-turning vehicles entering Campus would not be constructed. The resulting beneficial effect of reducing the congestion currently experienced at the intersection of Barrington Place and Sunset Boulevard would not occur under this alternative, nor would the beneficial effect of eliminating the queuing of vehicles on the adjacent streets.

The Project's beneficial effect on on-site parking capacity, including a net addition of 170 spaces at the East Campus and a net addition of 24 spaces on the West Campus that would be provided on site without relying on an off-site parking agreement, would not occur under this alternative. Therefore, if the School is unable to continue using parking on the VA property, a significant parking impact could result under this alternative.

<u>Rationale for Findings</u>: The No Project Alternative would not allow the Brentwood School to implement the Education Master Plan and would not meet any of the Project objectives. Specifically, the School would not be able to develop a sufficient amount of state-of-the-art educational facilities to meet evolving educational demands and to provide broader and richer experiences. The School would continue to rely on parking on the VA property for the East Campus, and East Campus access and pickup and drop-off operations would not be improved. The School would not have the ability to enhance the student experience by transferring sixth graders and increasing student enrollment, as the student enrollment increases would open more possibilities in scheduling, additional course offerings, and elective options, nor would there be multiple avenues of athletic and artistic expression or greater social breadth. Finally, the School would not have further opportunities to make the most effective use of the East and West Campuses within the Brentwood Community.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 1, please see Section V of the Draft EIR.

2. Alternative 2 – Reduced Student Enrollment Increase

Under Alternative 2, the increase in students would be approximately 20 percent less than that proposed under the Project. This alternative was chosen to consider a reduction in public utilities for water use and wastewater generation, solid waste generation, and operational noise and air quality impacts. For reference, the Project includes an increase in enrollment of 265 students at the East Campus, which consists of the relocation of 44 students from the West Campus and 221 new students. Alternative 2 would result in an increase in enrollment of 212 students at the East Campus, which would consist of the relocation of 44 students from the West Campus and 168 new students. Alternative 2 would still include the development of all of the new structures and other Campus improvements associated with the Project. This is because the School has the functional need for the new facilities that is independent of the student increase. Among other things, the Education Master Plan has identified the need for a separate Middle School Campus, more parking on land that it owns, larger classrooms with more breakout space, and updated facilities.

<u>Impact Summary</u>: Under Alternative 2, which would provide a 20 percent reduction in the Project's student enrollment increase, impacts related to operational air quality and noise with respect to mobile sources, mobile source operational GHGs, water, wastewater, and solid waste would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project.

<u>Findings</u>: Under Alternative 2, Reduced Student Enrollment Increase, which would provide a 20 percent reduction in the Project's student enrollment increase, impacts related to operational air quality and noise with respect to mobile sources, mobile source operational GHG's, non-peak-hour traffic, water, police and fire services, water, solid waste, and wastewater during operations would be incrementally less than under the

Project. Impacts due to operational air quality and noise with respect to stationary sources, historical resources, geology, hazards, hydrology, construction noise, peak hour traffic and stationary source GHG's would be the same as or similar to the Project. Like the Project, Alternative 2 would result in temporary significant impacts from construction vibration under the human annoyance standard, and would contribute to unavoidable significant cumulative impacts from construction noise at one sensitive receptor if construction overlaps with the Archer Forward project, and significant cumulative impacts from construction along the haul routes if construction overlaps and the Project is unable to use the VA Property for construction vehicle access to the East Campus. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative 2 – Reduced Student Enrollment Increase described in the Draft EIR.

<u>Rationale for Findings</u>: The Reduced Student Enrollment Increase Alternative would allow the Brentwood School to implement the Education Master Plan with regard to physical improvements. Therefore, this alternative would meet the Project objectives of developing new state-of-the-art educational facilities, providing sufficient on-site parking, and improving access and pickup and drop-off areas. Also, the sixth graders at the West Campus would be relocated to the East Campus, so there would be a distinct, Lower School, Middle School, and Upper School, consistent with the Project objectives. Therefore, this alternative would meet Project Objectives 1, 2, 4, 5, and 6.

However, Project Objective No. 3 related to objectives for the School to achieve an increased student enrollment with more possibilities in scheduling, additional course offerings and elective options, multiple avenues of athletic and artistic expression, and great social breadth would not be met as fully as under the Project. Therefore, Alternative 2 would not meet Project Objective No. 3 as fully as the Project. Moreover, this alternative would also not allow the School to make the most use of the existing Campuses in the Brentwood Community and expand opportunities to serve the needs of future students and the demands for the communal experience the Campuses offer as set forth in Project Objective No. 7. Thus, it would not meet Project Objectives No. 3 or No. 7 as fully as the Project.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 2, please see Section V of the Draft EIR.

3. Alternate 3 - Alternative Site Plans, East Campus

The placement of the three-story Middle School Classroom building was considered at four possible alternative locations (Sub-alternatives) on the East Campus. All other aspects of Alternative 3 would be the same as under the Project, including the increase in East Campus enrollment. These locations are considered to determine whether they would reduce potential aesthetic and noise impacts of the Project. Each of possible locations is shown in Draft EIR Figures V-1a through V-1d, Alternative 3 Site Plans, and is described as follows:

Sub-alternative 3a: With a reduction of the proposed paved and landscaped forecourt abutting Barrington Place, the Middle School Classroom Building would be placed closer to Barrington Place. The pickup and drop-off area at the East Campus' primary entrance would be eliminated. (See Draft EIR Figure V-1a).

Sub-alternative 3b: The Middle School Classroom Building would be located along the Campus boundary along, and would be aligned parallel to, Sunset Boulevard above the new parking garage. The Middle School Athletic Field would be reduced in length to accommodate the Middle School Classroom building. (See Draft EIR Figure V-1b).

Sub-alternative 3c: The Middle School Classroom Building would be located between the Project's new Upper School Arts building and the Middle School Physical Education Center and the SLT building. (See Draft EIR Figure V-1c).

Sub-alternative 3d: The Middle School Classroom Building would be located between the new Upper School Arts building and the Upper School Gymnasium and SLT building. (See Draft EIR Figure V 1d).

<u>Impact Summary</u>: Under Subalternatives 3a and 3b, aesthetic and light and glare impacts would be greater than under the Project, but still less than significant. Under Subalternatives 3c and 3d, aesthetic and light and glare impacts would be less than under the Project and also less than significant. Under Subalternative 3c and 3d, impacts with regard to hydrology, groundwater, and water quality would be greater than under the Project, but still less than significant. Under Subalternative 3a, construction noise and vibration impacts would be slightly greater than under the Project, and 3d, such impacts would be slightly less. As with the Project, such impacts would be significant and unavoidable under each Subalternative. In addition, transportation and circulation impacts would be greater under each Subalternative due to loss of additional on-site queuing space. However, as with the Project, such impacts would be less than significant. For all other impacts, Alternative 3 would result in the same or similar impacts.

<u>Findings</u>: Alternative 3, which would place the Middle School classroom building at different locations on the East Campus, would result in reduced impacts with respect to aesthetics and light and glare for all four sub-alternatives. Construction noise impacts would be greater under Sub-alternative 3a and reduced under Sub-alternatives 3b, 3c and 3d, as compared to the Project. All other impacts would be the same as those of the Project. It is found, pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternate 3 - Alternative Site Plans, East Campus described in the Draft EIR.

<u>Rationale for Findings</u>: Alternative 3 would allow the Brentwood School to implement the Education Master Plan. Improvement would be made to Campus buildings, grounds,

parking, circulation, and sufficient amount of state-of-the-art educational facilities to meet evolving educational demands and provide broader and richer experiences to inspire learning. In addition, the School would improve parking on the East Campus and not have to rely on the VA property for parking to meet the School's needs. Therefore, each of the Sub-alternatives would meet Project Objective Nos. 1, 2, 4, 5 and 7.

The 6th graders would be relocated from the West Campus to the East Campus and there would be a distinct Lower School, Middle School, and Upper School under Subalternatives 3a and 3b. Therefore, these Sub-alternatives would meet Project Objective No. 3: create a distinct Middle School Campus area within the East Campus. However, placement within the Campus core near the Upper School building as provided in Subalternatives 3c and 3d would not allow for a distinct Middle School that is somewhat separated from the Upper School students. Therefore, these Sub-alternatives would not meet Project Objective No. 3: create a distinct Middle School Campus area within the East Campus.

None of the four alternate locations of the Middle School Classroom Building would allow for the forecourt on Barrington Place, which will enhance pick-up and drop-off operations and increase student safety along Barrington Place. Therefore, none of the Subalternatives would fulfill Project Objective No 6.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 3, please see Section V of the Draft EIR.

4. Alternative 4: Reduced Square Footage of Development, East Campus

Under Alternative 4, the Upper School Arts Building on the East Campus would not be built, thereby eliminating Phase IV from the Project. Total new development on the East Campus would be reduced by 60,000 square feet of floor area and there would be 100 fewer parking spaces. However, because the existing 41,100-square-foot Middle School Classroom Gymnasium Building would not be demolished, Alternative 4 would represent an 18,890-square-foot reduction in floor area as compared to the Project. All other aspects of Alternative 4 would be the same as under the Project. Alternative 4 was selected to reduce potential significant construction noise and vibration impacts and less-than-significant aesthetic, construction air quality, and operational GHG impacts on the East Campus. The configuration of the East Campus is shown in Draft EIR Figure V-2, Alternative 4 Site Plans.

<u>Impact Summary</u>: Under Alternative 4, which would eliminate the Upper School Arts Building on the East Campus, impacts related to light and glare; construction noise and air quality; operational air quality and noise with respect to stationary sources; geology impacts associated with erosion and sedimentation; hydrology, groundwater, and water quality; hazards and hazardous materials; construction traffic; police and fire services; water, wastewater, and solid waste; and stationary-source operational GHGs would be incrementally less than the Project. All other impacts would be the same as or similar to the Project. Like the Project, Alternative 4 would result in temporary significant impacts from construction vibration under the human annoyance standard, and would contribute to unavoidable significant cumulative impacts from construction noise at one sensitive receptor if construction overlaps with the Archer Forward project, and significant impacts from construction noise and vibration along the haul routes if construction overlaps and the Project is unable to use the VA Property for construction vehicle access to the East Campus.

<u>Findings</u>: Under Alternative 4, which would eliminate the Upper School Arts Building on the East Campus, impacts related to light and glare, construction noise and air quality, geology, hazards, construction traffic, water, wastewater, and construction and stationary source operational GHGs would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project. It is found pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations), make infeasible Alternative 4: Reduced Square Footage of Development, East Campus described in the Draft EIR.

<u>Rationale for Findings</u>: With the elimination of the Upper School Arts Building, Alternative 4 would not meet Project Objective No. 1, to develop state-of-the-art educational facilities to meet evolving educational demands, as fully as the Project. Alternative 4 would add a reduced square footage of performing arts facilities in comparison to the Project and, therefore, would not meet Project Objective No. 2 (support a richer student experience by adding classrooms, administrative and meeting spaces, and new facilities for recreation and performing arts) as fully as the Project because of the reduced square footage of performing arts space would be added in comparison to the Project. The 6th graders would be relocated from the West Campus to the East Campus, and there would be a distinct Lower School, Middle School, and Upper School. However, the Middle School and Upper School students would be required to share performing arts facilities in the new Middle School Building. As such, Alternative 4 would not fully achieve Project Objective No. 3: create a distinct Middle School Campus area within the East Campus.

Because the parking proposed beneath the Upper School Arts Building would be eliminated, Alternative 4 would not provide sufficient parking to meet the School's needs on the East Campus and, therefore, would not meet Project Objective No. 4: provide sufficient parking to meet the School's needs.

Under Alternative 4, the School would enhance the student experience by transferring the 6th grade to the East Campus and creating a distinct Middle School Campus Area. In addition, increased student enrollment would open more possibilities in scheduling, additional course offerings, and elective options. However, since the Upper School Arts Building would not be developed, Alternative 4 would not provide the School with a new, modern creative arts facility for Upper School students. Therefore, Alternative 4 would

not meet Project Objective No. 5, allow for "multiple avenues of athletic and artistic expression" as would be provided as fully as the Project.

Although Alternative 4 would improve access and pick-up and drop-off operations, since less parking would be provided, Alternative 4 would achieve Project Objective No. 6: improve access and pick-up and drop-off operations to a lesser extent than the Project. Because the Upper School Arts Building would not be developed, the School would not make the most effective use of both Campuses and would, therefore, not meet Project Objective No. 7: cultivate the Brentwood School's long-standing communal environment by making the most effective use of the East and West Campuses within the Brentwood Community to the same extent as the Project.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 4, please see Section V of the Draft EIR.

5. Alternative 5—Reduced Square Footage of Development, West Campus

Under Alternative 5, the Admissions Building on the West Campus would not be built, thereby reducing construction in Phase III. Total new development on the West Campus would be reduced by 8,000 square feet of floor area. All other aspects of Alternative 5 would be the same as under the Project. Alternative 5 was selected to reduce significant construction noise and vibration impacts and less-than-significant aesthetic, construction air quality, and operational GHG impacts on the West Campus. The site plan under Alternative 5 is shown in Draft EIR Figure V-3, Alternative 5 Site Plans.

Impact Summary: Under Alternative 5, which would eliminate the Admissions Building, impacts related to aesthetics, light and glare; construction noise and air quality; operational air quality and noise with respect to stationary sources; geology impacts associated with erosion and sedimentation; hydrology, groundwater, and water quality; hazards and hazardous materials; construction traffic; police and fire services; water, wastewater, and solid waste, and stationary-source operational GHGs would be incrementally less than the Project and also less than significant. All other impacts would be the same as or similar to the Project. Like the Project, Alternative 5 would result in temporary significant impacts from construction vibration under the human annoyance standard, and would contribute to unavoidable significant cumulative impacts from construction noise at one sensitive receptor if construction overlaps with the Archer Forward project, and significant impacts from construction noise and vibration along the haul routes if construction overlaps and the Project is unable to use the VA Property for construction vehicle access to the East Campus.

<u>Findings</u>: Under Alternative 5, which would eliminate the Admissions Building, impacts related to aesthetics, light and glare, construction noise and air quality, operational air quality and noise with respect to stationary sources, geology, hydrology, hazards, water, wastewater, construction traffic, and GHGs would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project.

It is found pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations identified in Section XII of these Findings (Statement of Overriding Considerations), make infeasible Alternative 5—Reduced Square Footage of Development, West Campus described in the Draft EIR.

<u>Rationale for Findings</u>: With the elimination of the Admissions Building, Alternative 5 would not meet Project Objective No. 1, to develop a sufficient amount of state-of-the-art educational facilities to meet evolving educational demands, as fully as the Project. In addition, Alternative 5 would add a lesser square footage of administrative and meeting spaces, and, therefore, would not meet Project Objective No. 2 (add classrooms, administrative and meeting spaces, and new facilities for recreation and performing arts) as fully as the Project.

The 6th graders would be relocated from the West Campus to the East Campus and a distinct Lower School, Middle School, and Upper School would be created. Therefore, Alternative 5 would meet Project Objective No. 3: create a distinct Middle School Campus area within the East Campus. Since the same amount of parking would be provided on the East Campus as would be provided under the Project, Alternative 5 would meet Project Objective No. 4: provide sufficient parking to meet the School's needs.

Under Alternative 5, the School would enhance the student experience by transferring the 6th grade to the East Campus and creating a distinct Middle School area. In addition, an increase in student enrollment would open more possibilities in scheduling, additional course offerings, and elective options. Therefore, Alternative 5 would meet Project Objective No. 5: allow for "multiple avenues of athletic and artistic expression."

Alternative 5 would improve access and pick-up and drop-off operations, and would provide the same number of parking spaces, and would, therefore, achieve Project Objective No. 6: improve access and pick-up and drop-off operations. Because the Admissions Building would not be built, the School would not make the most effective use of both Campuses, it would, therefore, achieve Project Objective Nos. 7 to a lesser extent than the Project.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 5, please see Section V of the Draft EIR.

6. Alternative 6: Reduced Square Footage of Development, East and West Campuses Combined

Alternative 6 is a combination of Alternatives 4 and 5 and, if adopted, would provide for the decrease in development at both the East and West Campuses simultaneously. As described for Alternatives 4 and 5, the Upper School Arts Building on the East Campus would not be built, thereby eliminating Phase IV from the Project. Total new

development on the East Campus would be reduced by 60,000 square feet of floor area and there would be 100 fewer parking spaces. However, because the existing 41,100square-foot Middle School Classroom Gymnasium Building would not be demolished, Alternative 6 would represent an 18,890-square-foot reduction in floor area on the East Campus, as compared to the Project. The Admissions Building on the West Campus would not be built, thereby reducing construction in Phase III. Total new development on the West Campus would be reduced by 8,000 square feet of floor area in comparison to the Project, for a total reduction of 26,890 square feet on both Campuses combined. All other aspects of Alternative 6 would be the same as under the Project. Alternative 6 was selected to reduce potential significant construction noise and vibration impacts and less-than-significant aesthetic, construction air quality, and operational GHG impacts on the East and West Campuses. The site plans for Alternative 6 are shown in Draft EIR Figures V-2 and V-3, as described above, for the East and West Campuses, respectively.

<u>Impact Summary</u>: Under Alternative 6, which would eliminate the Admissions Building, impacts related to aesthetics; related to light and glare; construction noise and air quality; operational air quality and noise with respect to stationary sources; geology impacts associated with erosion and sedimentation; hydrology, groundwater, and water quality; hazards and hazardous materials; construction traffic; police and fire services; water, wastewater, and solid waste; and stationary-source operational GHGs would be incrementally less than the Project. All other impacts would be the same as or similar to the Project. Like the Project, Alternative 6 would result in temporary significant impacts from construction vibration under the human annoyance standard, and would contribute to unavoidable significant cumulative impacts from construction noise at one sensitive receptor if construction overlaps with the Archer Forward project, and significant impacts from construction noise and vibration along the haul routes if construction overlaps and the Project is unable to use the VA Property for construction vehicle access to the East Campus.

<u>Findings</u>: Alternative 6, which would eliminate both the Upper School Arts Building on the East Campus and the Admissions Building on the West Campus, would reduce impacts related to aesthetics, light and glare, construction noise and air quality, operational air quality and noise with respect to stationary sources, construction traffic, construction water demand and solid waste, and construction and stationary source operational GHGs in comparison to the Project. Of these, only the cumulative construction noise and project-specific and cumulative vibration impacts would be significant. All other impacts would be the same as those of the Project. It is found pursuant to Public Resources Code section 21081, subsection (a)(3), that specific economic, legal, social, technological, or other considerations, including considerations), make infeasible Alternative 6: Reduced Square Footage of Development, East and West Campuses Combined described in the Draft EIR.

<u>Rationale for Findings</u>: With the elimination of the Upper School Arts Building on the East Campus and the Admissions Building on the West Campus, Alternative 6 would not meet Project Objective No. 1, to develop state-of-the-art educational facilities to meet evolving educational demands, as fully as the Project. Alternative 6 would add a reduced square footage of performing arts facilities on the East Campus and a lesser square footage of administrative and meeting space on the West Campus in comparison to the Project, and, therefore, would not meet Project Objective No. 2: support a richer student experience by adding classrooms, administrative and meeting spaces, and new facilities for recreation and performing arts, as fully as the Project.

The 6th graders would be relocated from the West Campus to the East Campus, and there would be a distinct Lower School, Middle School, and Upper School. However, the Middle School and Upper School students would be required to share performing arts facilities in the new Middle School Building. As such, Alternative 6 would not fully achieve Project Objective No. 3: create a distinct Middle School Campus area within the East Campus.

Because the parking proposed beneath the Upper School Arts Building would be eliminated, Alternative 6 would not provide sufficient parking to meet the School's needs on the East Campus and, therefore, would not meet Project Objective No. 4: provide sufficient parking to meet the School's needs.

Under Alternative 6, the School would enhance the student experience by transferring the 6th grade to the East Campus and creating a distinct Middle School Campus Area. In addition, increased student enrollment would open more possibilities in scheduling, additional course offerings, and elective options. However, because the Upper School Arts Building would not be developed, Alternative 6 would not provide the School with a new modern creative arts facility for Upper School students. Therefore, Alternative 6 would not meet Project Objective No. 5, allow for "multiple avenues of athletic and artistic expression" as fully as the Project.

Under Alternative 6, the School would enhance the student experience by transferring the 6th grade to the East Campus and creating a distinct Middle School area. In addition, an increase in student enrollment would open more possibilities in scheduling, additional course offerings, and elective options. Therefore, Alternative 6 would meet Project Objective No. 5: allow for "multiple avenues of athletic and artistic expression" as fully as the Project.

Although Alternative 6 would improve access and pick-up and drop-off operations, Alternative 6 would construct 100 fewer parking spaces than the Project and would, therefore, meet Project Objective No. 6: improve access and pick-up and drop-off operations to a lesser degree than the Project. Since neither the Upper School Arts Building on the East Campus or the Admissions Building on the West Campus would be constructed, the School would not make the most effective use of the East and West Campuses, and would, therefore, achieve Project Objective No 7 to a lesser degree than the Project.

<u>Reference</u>: For a complete discussion of impacts associated with Alternative 6, please see Section V of the Draft EIR.

## D. Alternatives Rejected as Being Infeasible

In addition to the six alternatives listed above, three other alternatives were considered and rejected.

<u>Alternative Location within the VA Property</u>: Due to the lack of available land within the vicinity of the Project site, the adjacent VA property was considered for a possible alternative location for the Project's new buildings on the East Campus, including the Middle School Classroom Building, the Northeast Classroom Building, the Upper School Gymnasium, the Middle School Gymnasium, and the Upper School Arts Building. This alternative was rejected based, in part, on a recent settlement between the VA and certain veteran's groups that prohibits the VA from entering into the type of agreement that would allow the School to develop new buildings on a portion of the VA area. Regardless, environmental impacts under this alternative would be similar to the Project given the adjacent location. Therefore, an alternative location within the VA property is not assessed in this EIR.

<u>Alternative Location in the Brentwood Community</u>: An alternative location for both or either the East or West Campus is not considered feasible because the School neither owns nor can it reasonably acquire an alternative site of sufficient size to accommodate the Education Master Plan. Moreover, there is no undeveloped property within the area of adequate size available to accommodate the School's needs. Moreover, given the need to have each Campus functionally integrated, it is not feasible to locate new buildings at alternate locations. Therefore, an alternative location in the Brentwood Community is not assessed in this EIR.

<u>Alternative Location for the Upper School Arts Building</u>: This alternative considered placing the Upper School Arts Building on the existing North Parking Lot. This alternative was rejected because consultation with the residential neighbors to the immediate north revealed that the height of the building and the potential for noise-generating activities of the building (such as guest visitors at evening events, etc.) in closer proximity to the neighbors would create potentially greater impacts with respect to noise and land use compatibility.

## E. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that

the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

Table V-2 of the Draft EIR provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided in Section V (Alternatives) of the Draft EIR. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1 would avoid all of the impacts associated with the Project. However, Alternative 1 could result in significant parking impacts if the School loses its ability to park on the VA property.

Under Alternative 2, which would provide a 20 percent reduction in the Project's student enrollment increase, impacts related to operational air quality and noise with respect to mobile sources, mobile source operational GHGs, water, wastewater, and solid waste would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project.

Alternative 3, which would place the Middle School classroom building at different locations on the East Campus, would result in reduced impacts with respect to aesthetics and light and glare for all four sub-alternatives. Construction noise impacts would be greater under Sub-alternative 3a and reduced under Sub-alternatives 3b, 3c and 3d, as compared to the Project. All other impacts would be the same as those of the Project.

Under Alternative 4, which would eliminate the Upper School Arts Building on the East Campus, impacts related to light and glare, construction noise and air quality, geology, hazards, construction traffic, water, wastewater, and construction and stationary source operational GHGs would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project

Under Alternative 5, which would eliminate the Admissions Building, impacts related to aesthetics, light and glare, construction noise and air quality, operational air quality and noise with respect to stationary sources, geology, hydrology, hazards, water, wastewater, construction traffic, and GHGs would be incrementally reduced in comparison to the Project. All other impacts would be the same as those of the Project.

Alternative 6, which would eliminate both the Upper School Arts Building on the East Campus and the Admissions Building on the West Campus, would reduce impacts related to aesthetics, light and glare, construction noise and air quality, operational air quality and noise with respect to stationary sources, construction traffic, construction water demand and solid waste, and construction and stationary source operational GHGs in comparison to the Project. Of these, only the cumulative construction noise and project-specific and cumulative vibration impacts would be significant. All other impacts would be the same as those of the Project.

Based on the foregoing, Alternative 1 is considered the environmentally superior alternative. However, Alternative 1 would not meet any of the Project Objectives.

As noted previously, if Alternative 1 is determined to be environmentally superior, CEQA Guidelines require that an environmentally superior alternative must also be identified among the remaining alternatives. Based on the foregoing, Alternative 6 is considered to be the environmentally superior alternative. While Alternative 6 would reduce significant Project impacts, Alternative 6 would not provide a new Upper School Arts Building on the East Campus or Admissions Building on the West Campus, and would, therefore, not meet Project Objectives 2 through 5 and 7 as fully as the Project.

# XI. OTHER CEQA CONSIDERATIONS

# A. Growth Inducing Impacts

Section 15126.2(d) of the CEQA Guidelines requires that growth-inducing impacts of a project be considered in a Draft EIR. Growth-inducing impacts are characteristics of a project that could directly or indirectly foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to the CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant that, for example, may allow for more construction in service areas). In addition, as set forth in the CEQA Guidelines, increases in the population may tax existing community service facilities, thus requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require a discussion of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Growth can be induced or fostered as follows:

- Direct growth associated with a project;
- Indirect growth created either by the demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project

Because the Project would not include any new residential development, it would not result in direct population growth. However, the Project is expected to result in varying types of indirect growth.

1. Employment

The Project would result in the construction of academic and Campus improvements at the existing East and West Campuses of the Brentwood School. The Project would not directly develop any housing units and, thus, would not generate a direct increase in residential population. However, the Project would have the potential to generate indirect population growth in the Project site vicinity as a result of the new employees during construction. Given the supply of construction workers in the local work force and the temporary nature of such jobs, it is likely that construction workers would come from within the Los Angeles area. Therefore, given the availability of local workers, the Proposed Project would not be considered growth inducing from a short-term employment perspective, but rather the Project would provide a public benefit by providing new employment opportunities during the construction period.

Long-term operations of the Project would not result in a substantial increase in the regional population. While the Project would result in a 265-student increase in overall enrollment, these additional students are expected to be drawn from the existing student population across the greater Los Angeles area. In addition to the improved facilities

and the 265-student increase on the East Campus, there would be an increase in employment consisting of approximately 55 faculty and staff members and seven contract or part-time employees.

Should the Project result in families moving to the Los Angeles area for purposes of their children attending the Brentwood School or family members working at the Brentwood School, the new households would be accommodated by existing vacancies in the housing stock, commercially available goods and services, and public community services. With the additional students at the East Campus, which is located immediately adjacent to the Brentwood Village Commercial District, there is the potential for increased patronage at the businesses located within the adjacent commercial district. However, this demand would be met by the existing businesses and would not demand additional growth into areas not already developed. Any indirect population growth would be expected to be well within the established population forecasts for the Los Angeles regions and the Brentwood–Pacific Palisades Community Plan area. The existing commercial district would not need to expand facilities to provide services and goods to accommodate the increase in demand as a result of increased student body at the East Campus. Impacts would be less than significant.

# 2. Utility Infrastructure Improvements

As discussed in Draft EIR Section II, Project Description, the property surrounding the Project site is already developed with a mix of commercial, institutional, and residential uses. All roadway improvements planned for the Project would be tailored to improve circulation flows within the Project site and the immediate Project vicinity. Utility and other infrastructure upgrades are intended primarily to meet Project-related demand.

In addition, as discussed in Draft EIR Section IV.K.1, Public Utilities—Water, the Project would fall within the projected water supplies for normal, single-dry, and multiple-dry years and LADWP would be able to meet the water demand for the Project, as well as existing and planned water demands of its future service area. Furthermore, as discussed in Draft EIR Section IV.K.3, Public Utilities—Wastewater, the Project's additional wastewater flows would not exceed the future scheduled capacity of any treatment plant by generating flows in excess of than those anticipated in the Integrated Resources Plan. Therefore, the Project would not require the expansion of existing water infrastructure or upgrades to any wastewater treatment facilities, and as such, would not be considered growth-inducing in this regard.

While the Project may require local infrastructure upgrades to maintain and improve water, sewer, electricity, and natural gas lines on site and in the immediate vicinity of the Project site, the Project would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned for on a regional level. In addition, as previously described, all roadway improvements planned for the Project are intended to provide for better circulation flows within the Project site and the immediate Project vicinity, and would not open any large undeveloped areas for new use. As such, growth-inducing impacts associated with utilities and circulation systems would be less than significant.

# B. Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines states that use of nonrenewable resources during the initial and continued phases of a project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or nonuse thereafter unlikely. CEQA Guidelines Section 15126.2(c) indicates that "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Section 15126.2(c) further states that "irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." Section VI.C of the Draft EIR evaluates whether the Project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment.

The types and level of development associated with the Project would consume limited, slowly renewable and nonrenewable resources. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials and associated solid waste disposal effects on landfills, (2) water, and (3) energy resources (e.g., fossil fuels) for electricity, natural gas, and transportation and the associated impacts related to air quality.

1. Building Materials and Solid Waste

Construction of the Project would require consumption of resources that do not replenish themselves or that may renew so slowly as to be considered nonrenewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper, and lead), and petrochemical construction materials (e.g., plastics). During construction of the Project, a minimum of 65 percent (75 percent after 2020) of the nonhazardous demolition and construction debris would be recycled and/or salvaged for reuse in accordance with Project Design Feature PDF SW-1. Thus, the consumption of nonrenewable building materials such as lumber, aggregate materials, and plastics would be reduced.

2. Water

Project consumption of water during construction and operation of the Project is addressed in Section IV.K.1, Public Utilities—Water, of the Draft EIR. Water, which is a limited, slowly renewable resource, would be consumed during Project construction. However, given the temporary nature of construction activities, water consumption during Project construction would result in a less than significant impact on water supplies. As set forth in Draft EIR Section IV.K.1, the Project's operational water demand would fall within the projected water supplies for average, single-dry, and multiple-dry years, and the LADWP would be able to meet the water demand for the Project in addition to the existing and planned water demands of its future service area. Furthermore, pursuant to Project Design Features PDF W-1 and PDF W-2, the Project

would implement a variety of water conservation features, including, but not limited to, the use of water-efficient irrigation systems and efficient water systems and fixtures.

3. Energy Consumption and Air Quality

Project operation would continue to expend similar nonrenewable resources that are currently consumed within the City of Los Angeles and on-site. These include energy resources such as electricity, petroleum-based fuels, fossil fuels such as natural gas and oil, and water. Energy resources would be used for heating and cooling buildings, transportation within the Project site, and building lighting. Fossil fuels are primary energy sources for Project construction and operation. This existing, finite energy source would thus be incrementally reduced. Under Title 24, Part 6 of the California Code of Regulation, conservation practices limiting the amount of energy consumed by the Project is required during operation. In addition, the Project would incorporate a variety of green building elements, including the use of efficient water management techniques, green roofs, and other sustainability features, that would make them equivalent to a LEED Silver rating. Furthermore, the City of Los Angeles regulations would require the Project to conduct energy efficient planning and construction. Despite conservation practices and guidelines in energy conservation, commitment to the use of the nonrenewable resources would be long-term. The Project's energy consumption is discussed in greater detail in Section VI.F of the Draft EIR.

# 4. Environmental Hazards

As discussed in Draft EIR Section IV.F, Hazards and Hazardous Materials, hazardous materials currently used on-site are typical of those used on school grounds and include pesticides for landscaping, cleaning solvents for custodial maintenance, paints, lacquers, photographic chemicals and additional assorted chemicals in minor quantities for teaching purposes. Development of new school facilities has the potential to increase the acquisition, use, handling, and storage of hazardous materials on-site. However, the proposed operations would be similar to those operations occurring presently on-site and would not involve the use of large quantities of substantially different types of materials than those that currently exist. In addition, in compliance with Regulatory Compliance Measure RCM HAZ-1 included in Section IV.F, all hazardous materials on the Project site would continue to be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, State, and local requirements. Further. in accordance with Regulatory Compliance Measure RCM HAZ-5, prior to the issuance of any demolition permit or permit for remodeling of existing buildings, the School would conduct an asbestos survey and a qualified asbestos abatement contractor/specialist would remove or otherwise abate or manage any asbestos-containing building materials disclosed by the survey in accordance with the SCAQMD's Rule 1403. Additionally, with implementation of Regulatory Compliance Measures RCM HAZ-6 and RCM HAZ-7, potential impacts associated with the release of lead-based paints and PCBs during demolition activities would be reduced. As such, compliance with regulations and standards would serve to protect against significant and irreversible environmental change that could result from the accidental release of hazardous materials.

# 5. Conclusion

Based on the above, Project construction and operation would consume limited, slowly renewable and nonrenewable resources. However, the continued use of such resources during Project operation would be on a relatively small scale and consistent with regional and local urban design and development goals for the area. As a result, the use of nonrenewable resources in this manner would not result in significant irreversible changes to the environment.

The commitment of resources required for the type and level of development associated with the Project would limit the availability of these resources for future generations for other uses during the operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles region.

# C. CEQA Considerations

1. The City, acting through the Department of City Planning is the "Lead Agency" for the project, evaluated the EIR. The City finds that the EIR was prepared in compliance with CEQA and the CEQA Guidelines. The City finds that it has independently reviewed and analyzed the EIR for the Project, that the Draft EIR which was circulated for public review reflected its independent judgment, and that the Final EIR reflects the independent judgment of the City.

2. The EIR evaluated the following potential project and cumulative environmental impacts: Aesthetics; Air Quality; Historic Resources; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Population, Housing and Employment; Public Services; Transportation; and Utilities. Additionally, the EIR considered Growth Inducing Impacts and Significant Irreversible Environmental Changes. The significant environmental impacts of the project and the alternatives were identified in the EIR.

3. The City finds that the EIR provides objective information to assist the decisionmakers and the public at large in their consideration of the environmental consequences of the Project. The public review period provided all interested jurisdictions, agencies, private organizations, and individuals the opportunity to submit comments regarding the Draft EIR. The Final EIR was prepared after the review period and responds to comments made during the public review period.

4. Textual refinements were compiled and presented to the decision-makers for review and consideration. The City staff has made every effort to notify the decision-makers and the interested public/agencies of each textual change in the various documents associated with project review. These textual refinements arose for a variety of reasons. First, it is inevitable that draft documents would contain errors and would require clarifications and corrections. Second, textual clarifications were necessitated in order to describe refinements suggested as part of the public participation process.

5. The Department of City Planning evaluated comments on environmental issues received from persons who reviewed the Draft EIR. In accordance with CEQA, the Department of City Planning prepared written responses describing the disposition of significant environmental issues raised. The Final EIR provides adequate, good faith and reasoned response to the comments. The Department of City Planning reviewed the comments received and responses thereto and has determined that neither the comments received nor the responses to such comments add significant new information regarding environmental impacts to the Draft EIR. The Lead Agency has based its actions on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental impacts identified and analyzed in the EIR.

6. The Final EIR documents made changes to the Draft EIR. The Final EIR provides additional information that was not included in the Draft EIR. Having reviewed the information contained in the Draft EIR and the Final EIR and in the administrative record, as well as the requirements of CEQA and the CEQA Guidelines regarding recirculation of Draft EIRs, the City finds that there are no new significant impacts, substantial increase in the severity of a previously disclosed impact, significant information in the record of proceedings or other criteria under CEQA that would require recirculation of the Draft EIR, or preparation of a supplemental or subsequent EIR.

Specifically, the City finds that:

a. The Responses To Comments contained in the Final EIR fully considered and responded to comments claiming that the project would have significant impacts or more severe impacts not disclosed in the Draft EIR and include substantial evidence that none of these comments provided substantial evidence that the project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the Draft EIR.

b. The City has thoroughly reviewed the public comments received regarding the project and the Final EIR as it relates to the project to determine whether under the requirements of CEQA, any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption and has determined that there is no such substantial evidence and recirculation of the EIR is not required.

c. None of the information submitted after publication of the Final EIR, including testimony at the public hearings on the project, constitutes significant new information or otherwise requires preparation of a supplemental or subsequent EIR. The City does not find this information and testimony to be credible evidence of a significant impact, a substantial increase in the severity of an impact disclosed in the Final EIR, or a feasible mitigation measure or alternative not included in the Final EIR.

7. The mitigation measures identified for the project were included in the Draft and Final EIRs. As revised, the final mitigation measures for the project are described in the Mitigation Monitoring Program (MMP). Each of the mitigation measures identified in the

MMP is incorporated into the project. The City finds that the impacts of the project have been mitigated to the extent feasible by the mitigation measures identified in the MMP.

8. CEQA requires the Lead Agency approving a project to adopt a MMP or the changes to the project which it has adopted or made a condition of project approval in order to ensure compliance with the mitigation measures during project implementation. The mitigation measures included in the EIR as certified by the City and as adopted by the City serve that function. The MMP includes all of the mitigation measures and project design features adopted by the City in connection with the approval of the project and has been designed to ensure compliance with such measures during implementation of the project. In accordance with CEQA, the MMP provides the means to ensure that the mitigation measures are fully enforceable. In accordance with the requirements of Public Resources Code Section 21081.6, the City hereby adopts the MMP.

9. In accordance with the requirements of Public Resources Section 21081.6, the City hereby adopts each of the mitigation measures expressly set forth herein as conditions of approval for the project.

10. The custodian of the documents or other material which constitute the record of proceedings upon which the City's decision is based is the City Department of City Planning.

11. The City finds and declares that substantial evidence for each and every finding made herein is contained in the EIR, which is incorporated herein by this reference, or is in the record of proceedings in the matter.

12. The City is certifying an EIR for, and is approving and adopting findings for, the entirety of the actions described in these Findings and in the EIR as comprising the project.

13. The EIR is a Project EIR for purposes of environmental analysis of the Project. A Project EIR examines the environmental effects of a specific project. The EIR serves as the primary environmental compliance document for entitlement decisions regarding the Project by the City and other regulatory jurisdictions.

14. The City finds that none of the public comments to the Draft EIR or subsequent public comments or other evidence in the record, including any changes in the Project in response to input from the community and the Council Office, include or constitute substantial evidence that would require recirculation of the EIR prior to its certification and that there is no substantial evidence elsewhere in the record of proceedings that would require substantial revision of the I EIR prior to its certification, and that the EIR need not be recirculated prior to its certification.

## XII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR identified the following unavoidable significant impacts: 1) Noise - cumulative construction noise; and 2) Noise - Project-specific and cumulative construction vibration. Section 21081 of the California Public Resources Code and Section 15093(b) of the CEQA Guidelines provide that when the decisions of the public agency allows the occurrence of significant impacts identified in the Final EIR that are not substantially lessened or avoided, the lead agency must state in writing the reasons to support its action based on the Final EIR and/or other information in the record. Article I of the City's CEQA Guidelines incorporates all of the State CEQA Guidelines contained in Title 15, California Code of Regulations, Sections 15000 et seq. and thereby requires, pursuant to Section 15093 (b) of the CEQA Guidelines, that the decision-maker adopt a Statement of Overriding Considerations at the time of approval of a Project, if it finds that significant adverse environmental effects identified in the Final EIR cannot be substantially lessened or avoided. These findings and the Statement of Overriding Considerations are based on substantial evidence in the record, including, but not limited to, the Final EIR, the source references in the Final EIR, and other documents and material that constitute the record of proceedings.

Accordingly, the City adopts the following Statement of Overriding Considerations. The City recognizes that significant and unavoidable impacts will result from implementation of the Project. Having (i) adopted all feasible mitigation measures, (ii) rejected as infeasible alternatives to the Project, (iii) recognized all significant, unavoidable impacts, and (iv) balanced the benefits of the Project against the Project's significant and unavoidable impacts, the City hereby finds that the each of the Project's benefits, as listed below, outweighs and overrides the significant unavoidable impacts of the Project.

Summarized below are the benefits, goals and objectives of the Project. These provide the rationale for approval of the proposed Project. Any one of the overriding considerations of economic, social, aesthetic and environmental benefits individually would be sufficient to outweigh the significant unavoidable impacts of the project and justify the approval, adoption or issuance of all of the required permits, approvals and other entitlements for the Project and the certification of the completed Final EIR. Despite the unavoidable noise, impacts caused by the construction of the Project, the City approves the Project based on the following contributions of the Project to the community:

- The proposed Project would promote the objectives, goals, and policies of the Brentwood-Pacific Palisades Community Plan regarding the siting and development of schools.
- The proposed Project would support the evolving needs of education for essential learning facilities and artistic and visual arts performance space in a way that is consistent with other public and independent schools throughout the City of Los Angeles.
- The proposed Project would implement a robust Transportation Management Program and improve access and pick-up and drop-off operations for both the Brentwood Community and the Brentwood School.

- The proposed Project would relocate the main East Campus driveway farther from the Sunset/Barrington Place intersection to reduce potential vehicular conflicts and improve traffic flows at that intersection.
- The proposed Project would provide construction and educational-related employment opportunities that would maintain and enhance the economic vitality of the region and provide livable wages with benefits to those employees.
- The proposed Project would be designed and constructed to incorporate environmentally sustainable design features that would achieve the standards of the Silver Rating under the U.S. Green Building Council's Leadership in Energy Efficiency and Design (LEED®) green building program or equivalent green building standards.
- The proposed Project would help the City of Los Angeles fulfill the public policy Goal 7E of the General Plan Framework Element "A City with a highly qualified labor force."

# PUBLIC HEARING AND COMMUNICATIONS

Pursuant to Section 12.24 of the LAMC, the Department of City Planning conducted the required public hearing for the Brentwood Master Plan on behalf of the City Planning Commission, on October 6, 2016. The hearing was held at the University Synagogue to accommodate the expected large turnout and provide a convenient location within the community. Approximately 150 individuals were in attendance with 64 speakers from the public. The breakdown of speakers was as follows: 50 speakers spoke in support, 13 speakers spoke in opposition, and one provided general comments. The Hearing Officer closed the public hearing for oral testimony, but maintained the record of proceedings open for five additional days until 4:00 p.m. on October 11, 2016 to receive any additional written testimony. The hearing spanned approximately 4 hours and comments are noted below.

Seven written comments were submitted to the Hearing Officer at the hearing, with the five in support, one in opposition, and one making general comments. One written comment letter in opposition was also received by mail, as were 158 identical postcards in support of the Project. In addition, approximately 731 emails were received prior to and within the extended written comment period, with the majority (693) in support of the Project, and 38 in opposition. Included in the support email total were 397 identical form letters. It should be noted that additional emails were submitted to the Department of City Planning up to the completion of this report, which were not noted below, but reiterate comments listed below:

The Council District 11 staff expressed support for the project but felt that it could be improved further. They noted that it was "exceedingly rare" for a school to hold traffic steady while increasing attendance. Nevertheless, the status quo for traffic along Sunset Boulevard in Brentwood is unacceptable, and that the Council office would only support the project if it reduced traffic, under what they referred to as the "Sunset Standard," based on the Archer School for Girls expansion project approved in 2015. They also wanted to help other institutions reduce vehicle trips and include transparency and verification measures in the Conditional Use Permit.

Organized opposition groups included:

- Brentwood Community Council;
- Sunset Coalition; and
- Brentwood Hills Homeowner's Association.

## **Opposition Comment Summary:**

- Other local homeowners' associations besides the Brentwood Homeowners Association were not included in negotiations or the covenant.
- The TDM Plan says that it has a zero net increase, but allows for a 5% cushion.
- The Archer School had 55% less peak hour traffic, 45% less after their project.
- TDM Plan needs more compliance measures.
- 50% student busing is requested; Archer has 76% required.
- Parking reservations are requested.
- The monitoring is only cars, not students per car.
- There is nothing preventing shifting cars from one time to another; this is basic math.

## CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA

100 S. Barrington Place/12001 W. Sunset Boulevard

- A plan that reduces traffic and is more specific is requested.
- Construction traffic adds time, and there is no notification.
- Mount St. Mary's recently filed for a project.
- VA has not yet committed to letting construction vehicles use their property.
- BWS should wait until the Archer traffic is finished.
- Perhaps Phase I should be split.
- Council office had said that they would use Archer as a model for other schools.
- Brentwood School is 30% larger than Archer but has 5 times the traffic.
- The City Planning process is broken. Either it doesn't work or is corrupt.
- There need to be limits on athletic events.
- Residents have to breate carbon monoxide.
- Growth is outside of empathy with the residents.
- Traffic on Sunset is very congested and takes a long time to travel.
- Perhaps different plans should present their plans as a group.
- Number of sports teams has increased.
- Lower School parks buses on Saltair.
- EIR is substandard.
- No pedestrian safety plan.
- Bicycling on Sunset is dangerous.
- BWS is a private, for-profit school.
- The NOP was issued when the 405 project was "virtually done," so the baseline was lower and impacts are higher.
- The EIR has only a "vague promise" to a net zero increase, but no firm commitment.

## Support Comment Summary:

- BWS has spent 10 years on this process, working with the community.
- Parents say their children ride the bus or carpool, and it works well.
- The school promotes good values, and parents are proud of their children's work.
- Most students who live nearby take the bus.
- Brentwood is willing to make changes to their traffic plan.
- BWS has modified construction plans.
- The school needs improvements over time to its facilities.
- Students serve the community with VA stories and the Kick Cancer Walk.

## CPC 2015-3720-VCU-CU-SPR-ZAD-ZAA

100 S. Barrington Place/12001 W. Sunset Boulevard

- The new requirements for 3-student carpools are working.
- BWS understands the commitment they are making to the community.
- One size cannot fit all schools; they must be looked at individually.
- Many parents live in Brentwood and have an interest in keeping Sunset traffic manageable.
- BWS needs to stay competitive with other private schools.
- There has been a lot of misinformation about process and policies.
- BHA is the largest HOA in the area.
- BWS has consistently complied with their terms of the covenant.
- Big yellow school buses are clumsy and clog up traffic.
- Brentwood Village building owners say that BWS came to them for participation.
- One unintended consequence of busing is driving to dropoff points.
- BWS has partnered with Paul Revere school for busing.
- Don't judge a project just by traffic.
- Shouldn't fix traffic at the expense of education.
- The increase is on land the school owns; there is visual consistency.
- Faculty has adjusted their schedules.
- Flexibility is better than mandated busing.
- Moving the 6<sup>th</sup> graders to middle school will be useful for LAUSD transfers.

# EXHIBIT 1

East Campus Special Events

BWS EAST CAMPUS Events List 2015-16 by CATEGORY with Estimated Attendance Weekend Events in PURPLE The following reflect both current and EIR baseline conditions									
				Starts or Ends during current trip cap hours 7:30-8:30 AM or 3:00-6:00 PM					
Starts or ends during new added counting period of 6:00-7:00 PM									
Category	Day	Typical Start Time	Typical End Time	Event	Number	ESTIMATED Average # of Attendees NOT including students/fac/staff already on campus for a regular school day			
Admissions	SATURDAY	9:00AM	11:30AM	EC Admissions Prospective PARENT Open House	2	450			
Admissions	SATURDAY	8:30AM	11:00AM	EC Admissions Prospective STUDENT Open House	2	240			
Admissions	SATURDAY	8:00AM	1:00PM	ISEE Exams Testing Site	1	120			
Admissions	SATURDAY	10:30AM	1:30PM	Incoming 7th Grade Welcome Day	1	350			
Admissions	Weekday	9:30 AM	11:00 AM	EC Admissions Tour Guide Thank You Breakfast	1	100			
Admissions	Weekday	9:30 AM	11:00 AM	EC Admissions Tour Guide Training	2	50			
Alumni	Weekday	9:00AM	10:30AM	Alumni In the Boardroom	2	50			
Alumni	Weekday	7:00PIM	11:00PM	Alumni Poker Night	1	150			
Alumni	SATURDAY	6:30PM	11:00PM	10-Year, 20-Year, & 30-Year Alumni Class Reunions	1	300			
Alumni	SUNDAY	12:00PM	2:00PM	All-Alumni Family BBQ	1	200			
Alumni	Weekday	12:00PM	1:45PM	Young Alumni Luncheon	1	100			
Athletics	Weekday	7:00PM	8:30PM	College Bound Student Athlete Night, Parts 1 and 2	2	100			
Athletics	Weekday	7.00PM	8:00PM	EC Winter Sports Parent/Guardian Meeting	1	100			
Athletics	Weekday	7:00PM	8:30PM	US Sports Parent/Guardian Meeting	2	100			
Athletics	Weekday	6:00PM	7:15PM	MS Sports Parent/Guardian Meeting	2	75			
Athletics	SATURDAY	12:00PM	6:00PM	Small College Football Recruiting Fair	1	200: Attendees spread thru-out day			
Board	Weekday	7:00PM	9:00 PM	Board of Trustees and Guests Dinner	1	90			
Board	Weekday	5:00 PM	8:00 PM	Board of Trustees Meeting - PM	3	25			
Board	SUNDAY	4:00 PM	6:00 PM	Board of Trustees Reunion	1	75			
Board	Weekday	8:15 AM	11:15 AM	Board of Trustees Meeting - AM	3	25			
Community	SUNDAY	5:00PM	8:30PM	John Hutson Memorial Guest Lecture	1	1000			
Families	SATURDAY	9:00AM	10:00AM	Eagle Tri Fitness Challenge	1	200			
Families	Weekday	7:30PM	9:30PM	Junior/Senicr Candlelighting	1	500			
Families	Weekday	7:30PM	9:45PM	College Admissions Case Studies-11th Grade Families	1	400: BWS+ other schools			
Families	Weekday	7.00PM	9:00PM	11th Grade College Night	1	150			
Families	Weekday	7:00PM	8:30PM	Cum Laude Installation	1	120			
Families	Weekday	6:00PM	9:00PM	Senior Celebration	1	500			
Families	SUNDAY	4:00PM	6:00PM	9th Grade Peer Leadership Family Night	1	200			
Families	SUNDAY	4:00PM	6:00PM	Latino Family Potluck / Picnic	2	90			

BWS East Campus Events List - Page 1 of 3

Families	SUNDAY	3:00PM	5:00PM	AWeekdaycan American Family Potluck / Picnic	2	100
Families	Weekday	3:00PM	5:00PM	Book (Academic) Awards	1	40
Families	Weekday	3:00PM	5:00PM	All-School Art Show Opening Reception	1	20
Families	Weekday	2:00PM	4:00PM	42nd Commencement Ceremony	1	1200
Families	Weekday	2:00PM	4:30PM	8th Grade Promotion & Middle School Celebration	1	450
Families	SATURDAY	12:00PM	7:00PM	Homecoming: Attendance spread thru-out day	1	800: Attendees spread thru-out day
Families	SUNDAY	11:00AM	3:00PM	WC Eagles Harvest Festival	1	350: Attendees spread thru-out day
Families	SUNDAY	11:00AM	1:00PM	Gay Straight Alliance Weekdayends and Family Party	1	20
Families	SATURDAY	10:00AM	3:00PM	STEAM Day (EVERY OTHER YEAR)	1	350: Every other year
Families	SUNDAY	3:00 PM	5:00 PM	Retirement Reception	1	75
Meeting	Weekday	9:30AM	10:30AM	MS Parents Association Meeting	1	100
Meeting	Weekday	7:30AM	8:30AM	Coffee with the College Counselors - AM	1	80
Meeting	Weekday	7:30AM	8:30AM	US Parents Association Meeting	1	70
Meeting	Weekday	7:30AM	8:30AM	MS Mornings with Mark	4	40
Meeting	Weekday	1:00PM	2:00PM	Coffee with the College Counselors - Afternoon	2	80
Meeting	Weekday	1:00PM	2:30PM	US Grades Level(s) Reflections with Ryan	4	75
Parents	Weekday	9:45AM	11:30AM	All-School PA Meeting & Party Book Kick-off	1	150
Parents	SATURDAY	9:00AM	2:00PM	Parent University (Alternates with Diversity Day)	1	200: Every other year
Parents	Weekday	8:30AM	10:00ANA	WC Current 6th Grade Parent Coffee	1	50
Parents	Weekday	7:30PM	9:00PM	12th Grade Parent/Guardian College Counseling Night	1	150
Parents	Weekday	7:30PM	8:30PM	College Financial Aid Workshop, Parts 1 and 2	2	50
Parents	Weekday	7:30AM	9:00AM	8th Grade Parent/Guardian Coffee re: Upper School	1	75
Parents	Weekday	7:30AM	9:004M	Parent Affinity Group Meeting	3	15
Parents	Weekday	7:00PM	10:00PM	Upper School Back-to-School Night	1	400
Parents	Weekday	7:00PM	9:00PM	"Open Mike Night" with Head of School Mike Riera	1	150
Parents	Weekday	7:00PM	9:00PM	Grade Level Parent/Guardian College Counseling Mtg	3	150
Parents	Weekday	7:00PM	8:30PM	MS Grade Level Parent/Guardian Meeting	2	150
Parents	Weekday	7:00PM	9:00PM	Parent U Presents: K-12 Emotional Intelligence	1	150
Parents	Weekday	7:00PM	9:00PM	US Grade Level Parent/Guardian Registration Mtg	2	100
Parents	Weekday	6:30PM	9:00PM	Phonathon	1	100
Parents	Weekday	6:30PM	9:00PM	Grade Level Parent/Guardian Potluck Dinner	2	80
Parents	Weekday	6:15PM	9:30PM	Middle School Reception and Back to School Night	1	350
Parents	Weekday	6:00PM	8:00PM	EC Eagles Kickoff Meeting	1	. 20
Parents	Weekday	12:00PM	1:30PM	All-School PA Appreciation Lunch	1	250
Parents	Weekday	11:00AM	12:00PM	Parent Coffee with College Counselors-Grades 9/10	1	150
Performance	Weekday	7:00PM	9:00PM	Brentwood Dance Company Performance	1	245
Performance	SATURDAY	7:00PM	9:00PM	Brentwood Dance Company Performance	1	245

BWS East Campus Events List - Page 2 of 3

Performance	Weekday	7:00PM	9-00PM	Brentwood Theater Company Performance	3	245
Performance	SATURDAY	7:00PM	9:00PM	Brentwood Theater Company Performance	3	245
Performance	Weekday	7:00PM	10,00PM	K-12 (or US) Play Performance	3	245
Performance	SUNDAY	7:00PM	9:00PM	US Choral and Orchestral Concert	2	245
Performance	SATURDAY	7:00PM	9:00PM	US Music Performance	1	245
Performance	Weekday	7:00PM	9:00PM	MS Music Ensembles Concert	1	200
Performance	Weekday	7:00PM	9:00PM	US Jazz Concert	1	100
Performance	Weekday	7:00PM	9:00PM	MS Dance Company Performance	1	75
Performance	Weekday	7:00PM	8:45PM	MS Music Ensemble Concert	1	75
Performance	Weekday	7.00PM	8:30PM	MSDC Performance	1	75
Performance	Weekday	6:00PM	7:00PM	MS Theater Company Performance	1	40
Performance	SUNDAY	4:00PM	7:00PM	MSTC and MSDC Performing Arts Fundraiser	1	200
Performance	Weekday	3:30PM	6:00PM	Middle School Staircase Piays	1	40
Performance	SUNDAY	3:00PM	5:00PM	US Orchestra Concert	1	200
Performance "	Weekday	3:00PM	6:00PM	US Play Performance	1	175
Performance	SUNDAY	3:00PM	4:30PM	US Jazz Concert	2	100
Performance	SATURDAY	2:00PM	4:00PM	US Play Performance	3	245
Performance	SUNDAY	2:00PM	3:30PM	MSTC Performance	1	100
Students	Weekday	9:30AM	10:15AM	MS Eagles Pancake Day	2	15
Students	Weekday	9:30AM	10:15AM	US Eagles Pancake Day	2	15
Students	Weekday	8:00AM	3:00PM	Diversity Day (Alternates with Parent University)	1	100: Every other year; outside speakers/guests arrival spread thru-out day
Students	Weekday	8:00AM	9:15AM	MS Pillar Awards Ceremony	1	30
Students	Weekday	7 DOPM	10:00PM	US Coffeehouse	2	100
Students	SATURDAY	7:00PM	9:00PM	GSA "GayLA" Dance	1	60
Students	SATURDAY	7:00AM	7:00PM	National Speech/Debate Qualifying Tournament-Interscholastic	2	300
Students	Weekday	6:00PM	8:00PM	MS Movie and Game Night	1	75
Students	Weekday	4:30PM	6:00PM	Commencement Rehearsal	1	150
Students	Weekday	4:00PM	5:30PM	MS Coffeehouse	1	100
Students	Weekday	3:00PM	6:00PM	All-School Family Barbecue Senior Class Fundraiser	1	80
Students	Weekday	11:00AM	12:30PM	US Awards Ceremony	1	50
Students	SUNDAY	10:00AM	1:00PM	PSATURDAY Workshop for 10th/11th Grades	1	150
Students	SATURDAY	10:00AM	12:00PM	8th to 9th Grade Transition Day	1	200
Students+ Community	SATURDAY	9:30AM	4:00PM	YWC - Young Women's Conference (EVERY OTHER YEAR)	1	1000: Every other year

BWS East Campus Events List - Page 3 of 3

### Brentwood School EAST CAMPUS Athletics by SPORT 2015-16 HOME GAMES with Estimated Attendance Weekends=Purple, Middle School=Red The following reflect both current and EIR baseline conditions

للازية والمحمول والمحمول		Starts or e	ends during new	w counting	period of 6:00	0-7:00 PM		
Sport	Season	Day	Game Type	Number	Typical Start Time	Typical End Time	Level	ESTIMATED # of Attendeesees NOT including BWS team members/other students/fac/staff already on campus a regular school day (NOTE: Visiting teams typically arrive together by bus so those team members are not count here individually)
Baseball	February-May	Weekday	Tournament	1	02:30PM	05:00PM	Varsity	100
Baseball	February-May	SATURDAY	Tournament	1	02:30PM	05:00PM	Varsity	100
Baseball	February-May	Weekday	Game	12	03:45PM	06:00PM	Middle School	30
Baseball	February-May	Weekday	Game	8	04:00PM	06:00PM	Varsity	30
Baseball	February-May	SATURDAY	Game	4	11:00AM	02:00PM	Varsity	30
	Tribel growing		14 2 3 3		100	1.22	No. of the second	
Basketball-Boys	December-February	Weekday	Game	8	07:00PM	08:00PM	Varsity	125
Basketball-Boys	December-February	SATURDAY	Game	1	04:00PM	05:00PM	Varsity	125
Basketball-Girls	December-February	Weekday	Game	11	05:15PM	06:30PM	Varsity	125
Basketball-Girls	December-February	Tuesday	Game	1	04:00PM	06:00PM	Junior Varsity	75
Basketball-Boys	December-February	Weekday	Game	7	05:30PM	06:00PM	Junior Varsity	50
Basketball-Boys	December-February	SATURDAY	Game	4	03:00PM	04:00PM	Junior Varsity	50
Basketball-Boys	December-February	Weekday	Game	18	03:30PM	04:30PM	Middle School	40
Basketball-Girls	December-February	Weekday	Game	16	04:30PM	05:30PM	Middle School	40
Cross Country- Boys/Girls	September	Weekday	League	3	04:30PM	07:00PM	Varsity	100
Cross Country- Boys/Girls	September	SATURDAY	Non-League	1	09:30AM	07:00PM	Varsity	100
Cross Country- Boys/Girls	League	Weekday	League	1	04:00PM	06:00PM	Middle School	200
Football (11 man)	September-November	Weekday	Game	5	03:00PM	05:00PM	Varsity	150
Football (11 man)	September-November	SATURDAY	Game	2	02:00PM	04:00PM	Varsity	150
Football (11 man)	September-November	Weekday	Game	1	03:15PM	05:00PM	Junior Varsity	50
Football (11 man)	September-November	SATURDAY	Game	1	11:30AM	02:00PM	Junior Varsity	50
Football (11 man)	September-November	SATURDAY	Game	4	10:00AM	12:00PM	Middle School	100

BWS East Campus Athletics Page1 of 3

### Brentwood School EAST CAMPUS Athletics by SPORT 2015-16 HOME GAMES with Estimated Attendance Weekends=Purple, Middle School=Red The following reflect both current and EIR baseline conditions

Sport	Season	Day	Game Type	Number of Games	Typical Start Time	Typical End Time	Level	ESTIMATED # of Attendeesees NOT including BWS team members/other students/fac/staff already on campus on a regular school day (NOTE: Visiting teams typically arrive together by bus, so those team members are not counted here individually)
				0.123	Sec. 1		212.4	
Lacrosse, Boys	February-April	Weekday	Game	8	04:00PM	06:00PM	Varsity	30
Lacrosse, Boys	February-April	SATURDAY	Game	2	03:00PM	05:00PM	Varsity	30
Lacrosse, Boys	February-April	Weekday	Game	, 2	04:30PM	06:00PM	Middle School	40
Lacrosse, Boys	February-April	SATURDAY	Game	2	10:00AM	12:00PM	Middle School	40
				100102	10000 (D	IN THE R.	SAUSTINS.	
Soccer-Boys	November-February	Weekday	Game	12	03:15PM	05:00PM	Varsity	35
Soccer-Girls	November-February	Weekday	Game	12	03:15PM	05:00PM	Varsity	35
Soccer-Girls	November-February	SATURDAY	Tournament	1	09:00AM	04:00PM	Varsity	100: Atendees spread thru-out day
Soccer-Boys	November-February	Weekday	Game	9	03:15PM	05:00PM	Junior Varsity	25
Soccer-Girls	November-February	Weekday	Game	7	03:15PM	05:00PM	Junior Varsity	25
Soccer-Boys	November-February	Weekday	Game	6	03:30PM	05:00PM	Middle School	40
Soccer-Girls	November-February	Weekday	Game	5	03:30PM	05:00PM	Middle School	40
Soccer-Girls	January	SATURDAY	Game	Alumni	10:30AM	12:30AM	ALUMNI	50: Home Field every other year
Softball	March-May	Weekday	Game	10 .	03:30PM	05:00PM	Varsity	20
Swimming/Diving-Boys/Girls	September-May	Weekday	League	6	03:30PM	05:00PM	Varsity	75
Swimming/Diving-Boys/Girls	September-May	Weekday	Meet	2	01:30PM	04:00PM	Varsity	8.5
Swimming/Diving-Boys/Girls	September-May	Weekday	League	2	03:30PM	05:00PM	Middle School	100
Swimming/Diving-Boys/Girls	September-May	SATURDAY	Meet	1	09:00AM	05:00PM	Middle School	300: Attendees spread thru-out day
CONSULATION CONSULATION OF	Fabruary Mar	1Ma aluda	Add 1					
Tennis-Boys	February-May	Weekday	Match	12	03:30PM	05:00PM	Varsity	12
Tennis-Boys	February-May	Weekday	Match	6	03:30PM	05:00PM	Junior Varsity	12
Tennis-Boys	February-May	Weekday	Match	6	03:30PM	05:00PM	Middle School	15
Tennis-Girls	September-November	Weekday	Match	7	03:30PM	05:00PM	Varsity	12

BWS East Campus Athletics Page2 of 3

### Brentwood School EAST CAMPUS Athletics by SPORT 2015-16 HOME GAMES with Estimated Attendance Weekends=Purple, Middle School=Red The following reflect both current and EIR baseline conditions

Sport	Season	Day	Game Type	Number of Games	Typical Start Time	Typical End Time	Level	ESTIMATED # of Attendeesees NOT including BWS team members/other students/fac/staff already on campus or a regular school day (NOTE: Visiting teams typically arrive together by bus, so those team members are not counter here individually)
Tennis-Girls	September-November	Weekday	Match	9	03:30PM	05:00PM	Junior Varsity	12
Tennis-Girls	September-November	Weekday	Match	7	03:30PM	05:00PM	Middle School	15
	The Darry of the state	1.5	C- Darges	12			TEST UP 1	
Track/Field-Boys/Girls	March-April	Weekday	Meet	2	03:30PM	06:00PM	Varsity	300: Atendees spread thru-out event
Track/Field-Boys/Girls	March-April	Weekday	Meet	3	03:45PM	06:00PM	Middle School	300: Atendees spread thru-out event
		10.11.2.8.1	21000					a filmer in statistication
Volleyball-Boys	March-May	Weekday	Game	8	05:15PM	07:00PM	Varsity	35
Volleyball-Boys	March-May	Weekday	Game	5	04:00PM	05:00PM	Junior Varsity	25
Volleyball-Boys	March-May	Weekday	Game	11	04:00PM	05:00PM	Middle Schoo	30
6th Grade Coastal Canyon League Volleyball Festival	March	Weekday	Tournament	6th Grade	01:00PM	6:00PM	6th Grade	150
Volleyball-Girls	September-November	Weekday	Game	9	04:15PM	06:00PM	Varsity	35
Volleyball-Girls	September-November	Weekday	Game	5	04:00PM	05:00PM	Junior Varsity	25
Volleyball-Girls	September-November	Weekday	Game	20	04:00PM	05:00PM	Middle School	30
Volleyball-Girls	October	Weekday	Tournament	1	3:00PM	8:00PM	Varsity	200: Atendees spread thru-out event
Volleyball-Girls	October	SATURDAY	Tournament	1	8:00AM	5:00PM	Varsi <b>ty</b>	300: Atendees spread thru-out event
Water Polo-Boys	September-November	Weekday	Tournament	1	03:00PM	07:00PM	Varsity	300: Atendees spread thru-out event
Water Polo-Boys	September-November	SATURDAY	Tournament	1	02:00PM	05:00PM	Varsity	300: Atendees spread thru-out event
Water Polo-Boys	September-November	Weekday	Meet	7	04:30PM	06:00PM	Junior Varsity	25
Water Polo-Boys	September-November	Weekday	Tournament	_1	03:50PM	07:00PM	Junior Varsity	300: Atendees spread thru-out event
Water Polo-Boys	September-November	SATURDAY	Tournament	1	09:00AM	12:00PM	Junior Varsity	300: Atendees spread thru-out event

BWS East Campus Athletics Page3 of 3

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# EXHIBIT 2

West Campus Special Events

	Bro			VIPUS Events List 2015-16 by CATEGORY with Est Weekend Events in PURPLE		ndance
West Campus CUP on school days) or o	Limits on special on weekends or h	events: "In any 1	2 month period	ig reflect both current and EIR baseline condition no more than 34 events expected to attract more than 50 m ategory for 2015-16 are highlighted below.		wed after normal school hours (i.e. 5 p.m
Category	Day	Typical Start Time	Typical End Time	Event	Number	ESTIMATED Average # of Attendees NOT including students/fac/staff already on campus for a regular school day
Admissions	SATURDAY	8:30AM	12:00PM	Kindergarten Admissions Open House	1	250
Admissions	Weekday	9:30AM	11:00AM	6th Grade Admissions Parent Open House	1	125
Admissions	Weekday	9:30 AM	11:00 AM	New Kindergarten Parent Orientation	1	90
Admissions	Weekday	2:00 PM	3:00 PM	New Kindergarten Playdate	1	90
Admissions	Weekday	3:45 PM	4:45 PM	New Kindergarten Playdate	1	90
Admissions	Weekday	9:30 AM	10:30 AM	WC Applicants Coffee & ConverSATURDAYion	2	80
Admissions	SATURDAY	8:00 AM	9:00AM	WC Admissions Playdate: Kinder Applicants	2	75
Admissions	SATURDAY	9:30AM	10:30AM	WC Admissions Playdate: Kinder Applicants	2	75
Admissions	SATURDAY	11:00AM	12:00 PM	WC Admissions Playdate: Kinder Applicants	2	75
Admissions	Weekday	2:45 PM	3:45 PM	Admissions Playdate: Kinder Fac/Staff/Siblings	1	50
Admissions	Weekday	9:30 AM	10:30 AM	Admissions Tour Guide Thank You Breakfast	1	50
Admissions	Weekday	9:30 AM	10:30 AM	Alumni Introduction to the Lower School	1	50
Admissions	Weekday	9:30 AM	10:30 AM	WC Admissions Host Family Training	1	30
Admissions	Weekday	1:00 PM	2:00 PM	WC Admissions Host Family Training	1	30
Admissions	Weekday	9:30 AM	10:30 AM	WC Admissions Tour Guide Training - AM	2	25
Admissions	Weekday	1:00 PM	2:00 PM	WC Admissions Tour Guide Training - Afternoon	1	15
Families	Weekday	9:00AM	10:00AM	6th Grade Promotion	1	300
Families	Weekday	9:45AM	11:30AM	Grandparents and Special Friends Days	3	250
Families	Weekday	6:00PM	8:30PM	6th Grade Family Dinner	1	175
Families	SATURDAY	4:00PM	6:00PM	Asian Family ASA Potluck	1	80
Families	Weekday	6:30PM	9:00PM	Kindergarten Pizza and Pajama Party	1	10
Families	Weekday	9:00AM	10:30AM	New Family Orientation Grades 1-6	1	10
nternal	SATURDAY	6:30PM	10:00PM	Faculty/Staff/Trustee Holiday Party	1	300 ·
nternal	Weekday	12:00 PM	2:00 PM	K-12 Faculty/Staff Lunch	1	200
Parents	Weekday	6:30PM	9:00PM	Grade Level(s) Back to School Nights	3	125
Parents	Weekday	9:00AM	11:30AM	Kindergarten Parents Day	1	80

BWS West Campus Events List - Page1 of 2

Admissions	Weekday	9:30AM	11:00AM	6th Grade Admissions Parent Open House	1	125
Parents	Weekday	6:30PM	9:00PM	Kindergarten Welcome to School Night	1	80
Parents	Weekday	7:00PM	9:00PM	"Open Mike Night" with HOS Mike Riera		50
Parents	Weekday	11:40AM	2:00PM	WC Eagles BBQ and Ice Cream Day	1	50
Parents	Weekday	8:30AM	9:30AM	Kindergarten Grade Parent Coffee	1	50
Parents	Weekday	8:30AM	9:30AM	Grade Level Parent Coffees	7	40
Parents	Weekday	7:00PM	9:00PM	WC Eagles Eagles Meeting	3	30
Parents	Weekday	11:40AM	1:00PM	WC Eagles Ice Cream Day	1	20
Parents	Weekday	7:45AM	8:30AM	WC Eagles Pancake Breakfast	2	20
Performance	Weekday	10:30AM	11:30AM	Grade Level Spring Performances - AM	3	150
Performance	Weekday	1:00PM	2:00PM	Grade Level Spring Performances - Afternoon	5	150
Performance	Weekday	1:00PM	2:00PM	Grade Level Winter Performances - Afternoon	6	150
Performance	Weekday	6:30PM	8:30PM	6th Grade Musical	2	150
Performance	Weekday	6:00PM	7:30PM	Lower School Musical Theater Performance	1	150
Performance	SATURDAY	2:00PM	3:30PM	Lower School Musical Theater Performance	1.	150
Performance	Weekday	1:00PM	2:00PM	Kindergarten Musical	2	125
Performance	Weekday	10:30AM	11:30AM	Grade Level Winter Performances - AM	1	100
Students	Weekday	9:00AM	10:00AM	K-12 Opening Ceremony (EC arrives by bus)	1	800: EC students/fac/staff
Students	Weekday	3:30PM	4:30PM	Celebration of Lower School Years	1	25

BW5 West Campus Events List - Page2 of 2

Sport	Season	Day	Number of Games	Typical Start Time	Typical End Time	Level	ESTIMATED # of Attendees NOT including BWS team members/othe students/fac/staff already on campu on a regular school day
Basketball	January-March	Weekday	9	4:00	5:00	4th	45
Basketball	January-March	Weekday	4	4:30	4:30	5th	35
Basketball	January-March	Weekday	7	3:45	4:45	6th	35
Boys Voileyball	April-May	Weekday	4	3:45	4>45	4th	35
Boys Volleyball	April-May	Weekday	7	3:45	4:45	5th	20
Co-Ed Soccer	April-May	Weekday	9	3:45	4:45	4th	50
Co-Ed Soccer	April-May	Weekday	5	3:45	4:45	5th	40
Co-Ed Soccer	April-May	Weekday	4	3:45	4:45	6th	45
Flag Football	September-November	Weekday	6	3:45	4:45	4th	40
Flåg Football	September-November	Weekday	5	3:45	4:45	5th	40
Flag Football	September-November	Weekday	5	3:45	4:45	6th	35
Girls Basketball	September-November	Weekday	6	3:45	4:45	4th/5th	40
Girls Volleybalf	January-March	Weekday	6	4:00	5:00	4th	40
Girls Volleyball	January-March	Weekday	4	3:30	4:30	5th	40
Girls Volleyball	January-March	Weekday	6	3:45	4:45	6th	40

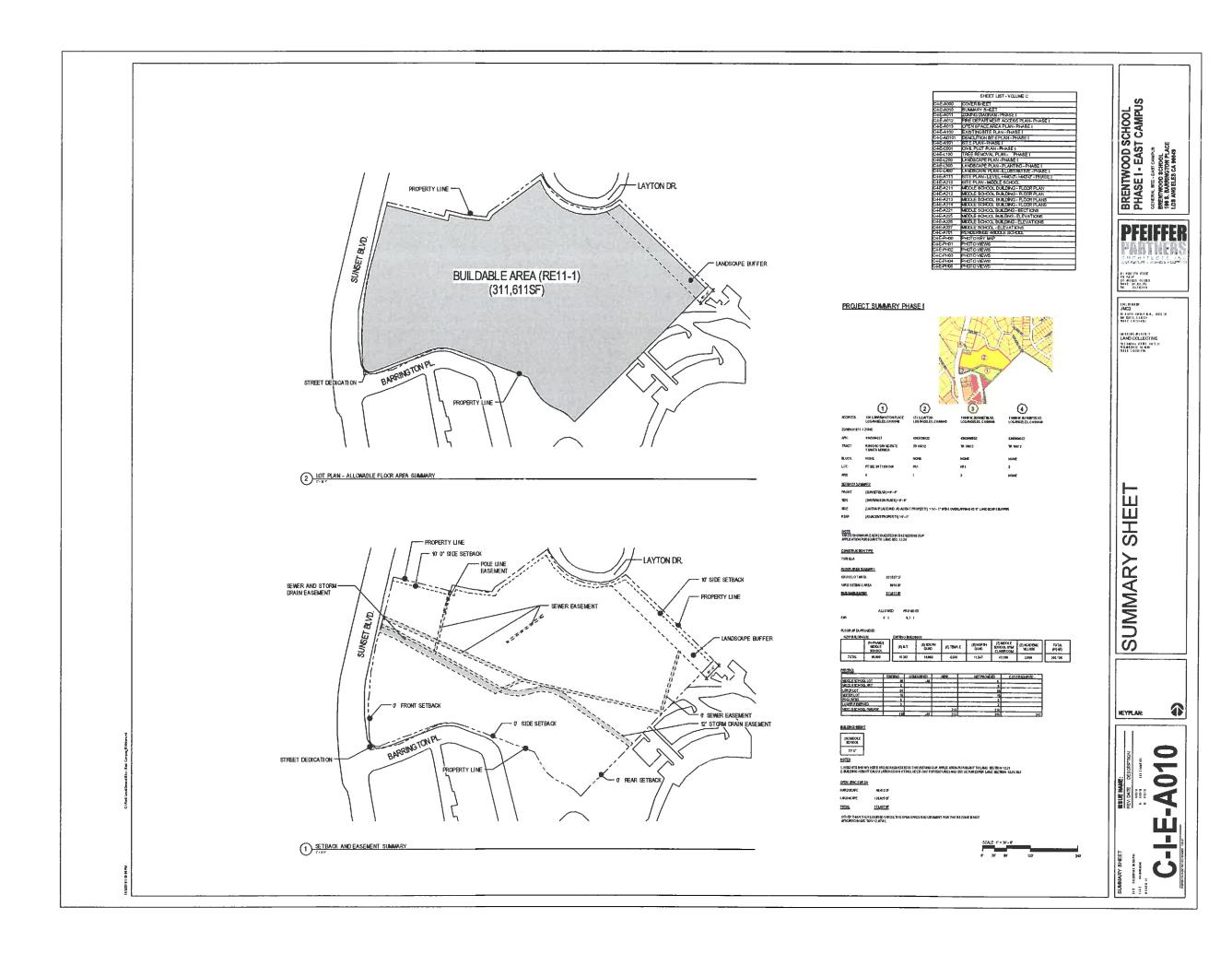
### Brentwood School WEST CAMPUS Athletics by SPORT 2015-16 HOME GAMES with Estimated Attendance The following reflect both current and EIR baseline conditions

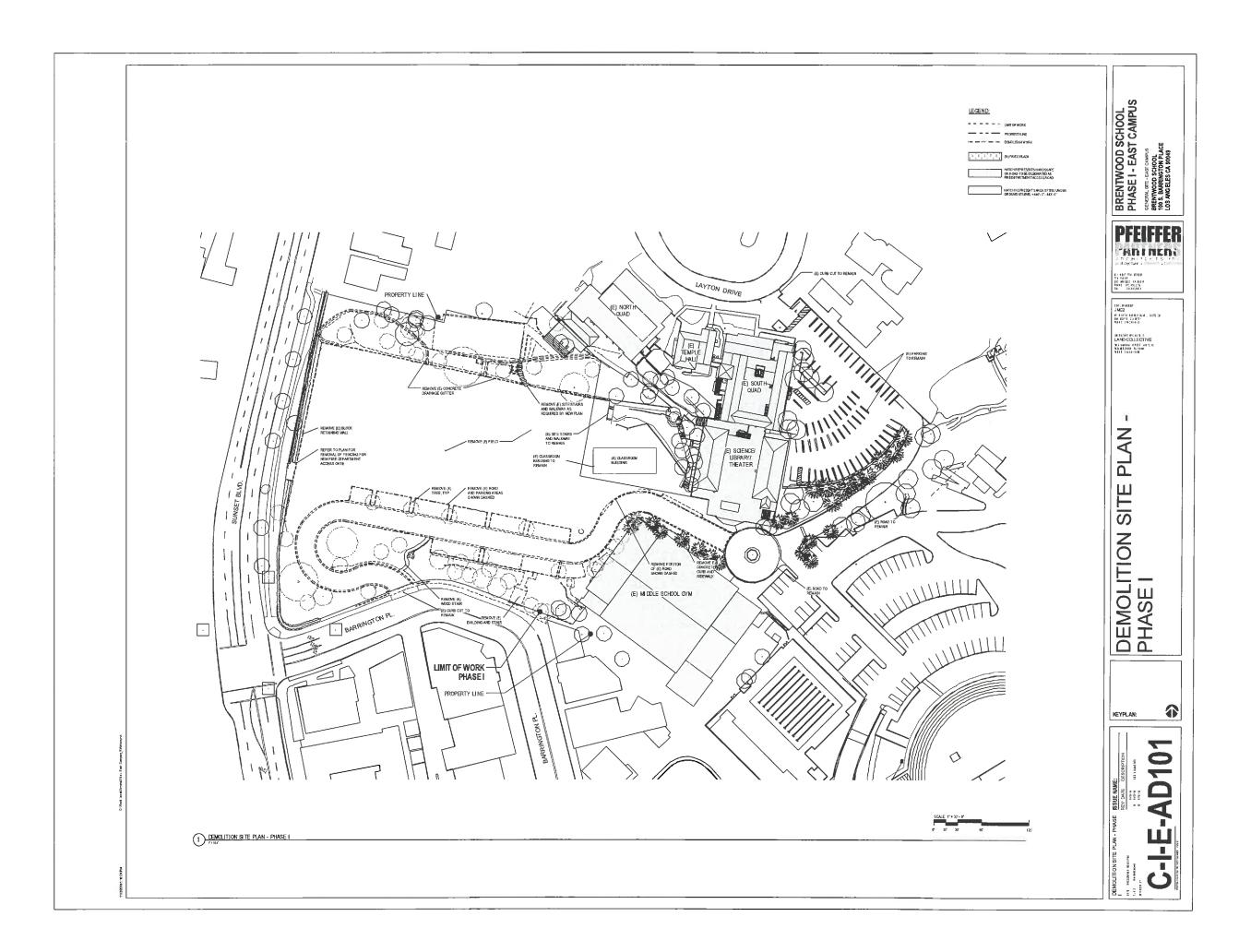
BWS West Campus Athletics 1 of 1

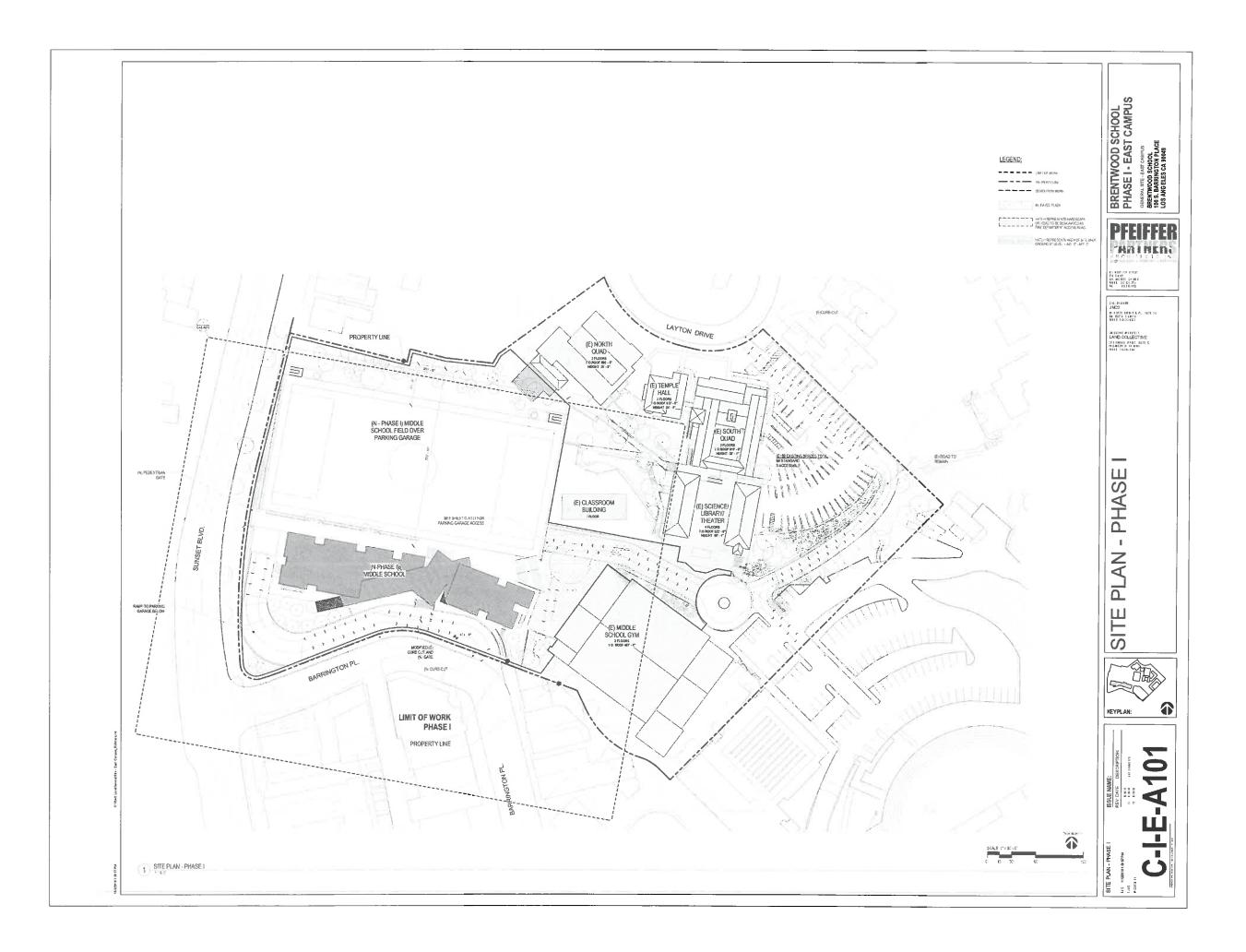
# SITE PLANS

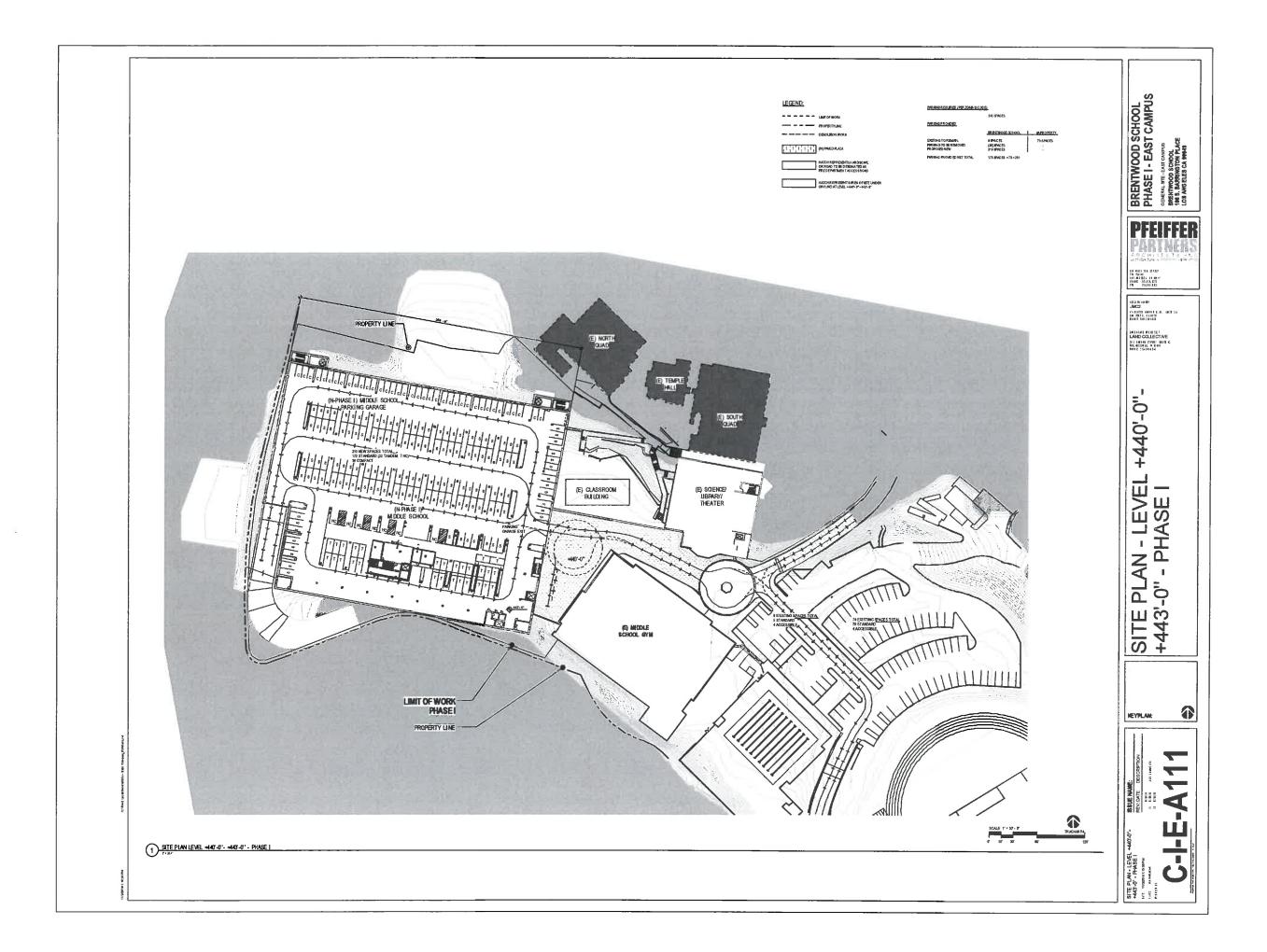
East Campus, Phase I Summary Sheet **Demolition Site Plan** Site Plan Site Plan (Parking) Landscape Plan Elevations (1) Elevations (2) Renderings East Campus, Phase II Summary Sheet **Demolition Site Plan** Site Plan Landscape Plan Elevations East Campus, Phase III Summary Sheet **Demolition Site Plan** Site Plan Landscape Plan Elevations (1) Elevations (2) East Campus, Phase IV **Summary Sheet Demolition Site Plan** Site Plan Site Plan (Parking) Landscape Plan Elevations (1) Elevations (2) East Campus, Alternate Phase I Summary Sheet **Demolition Site Plan** Site Plan Site Plan (Parking) Landscape Plan Elevations (1) Elevations (2)

Renderings East Campus, Alternate Phase II Summary Sheet Demolition Site Plan Site Plan Landscape Plan Elevations East Campus, Alternate Phase III Summary Sheet **Demolition Site Plan** Site Plan Landscape Plan Elevations (1) Elevations (2) East Campus, Alternate Phase IV Summary Sheet **Demolition Site Plan** Site Plan Site Plan (Parking) Landscape Plan Elevations (1) Elevations (2) West Campus, Phase I Summary Sheet **Demolition Site Plan** Site Plan Site Plan (Parking) Landscape Plan Elevations Renderings West Campus, Phase III **Summary Sheet** Demolition Site Plan Site Plan Site Plan (Parking) Landscape Plan Elevations (1) Elevations (2)

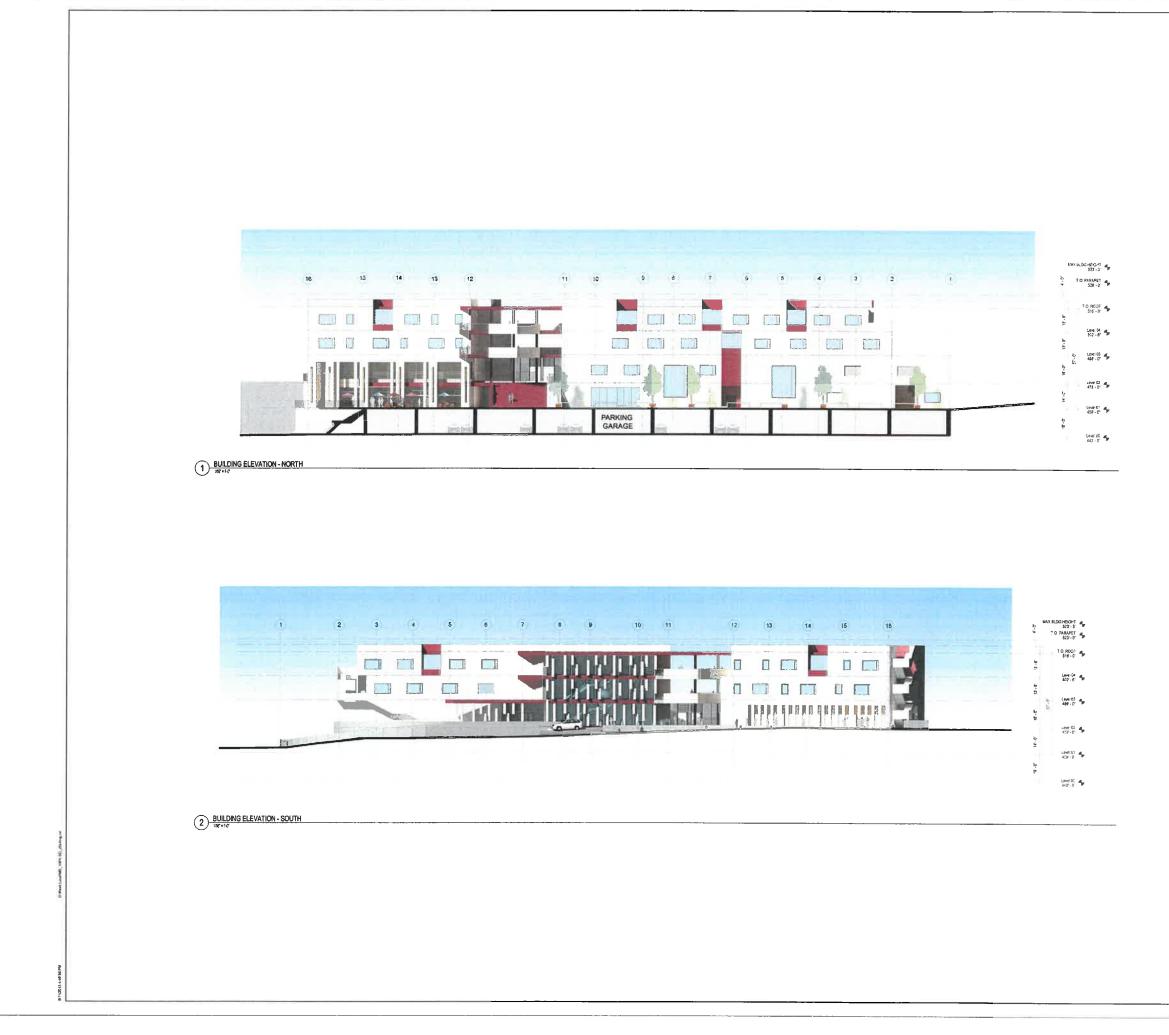




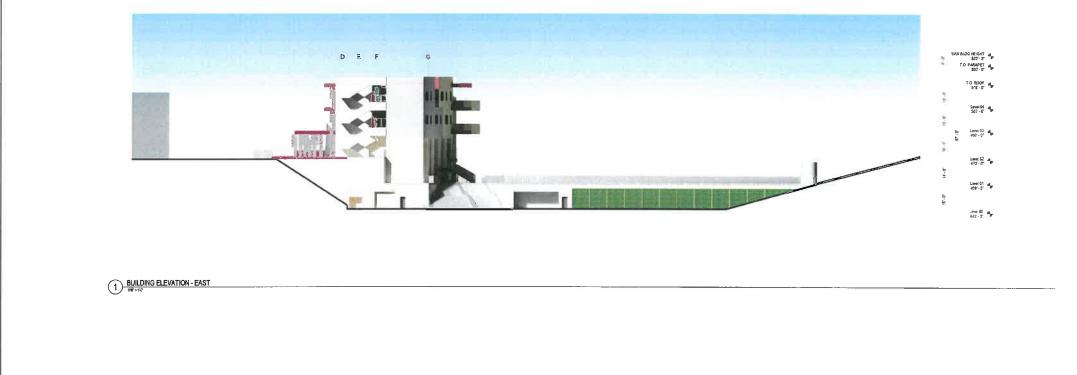




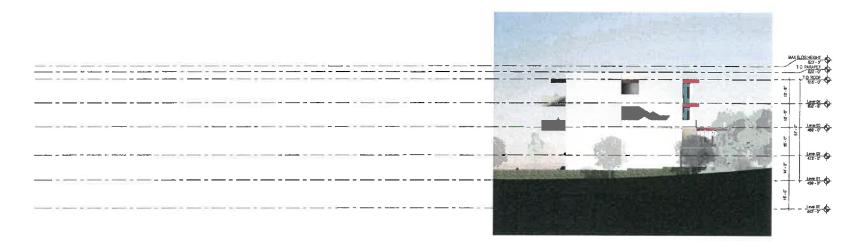








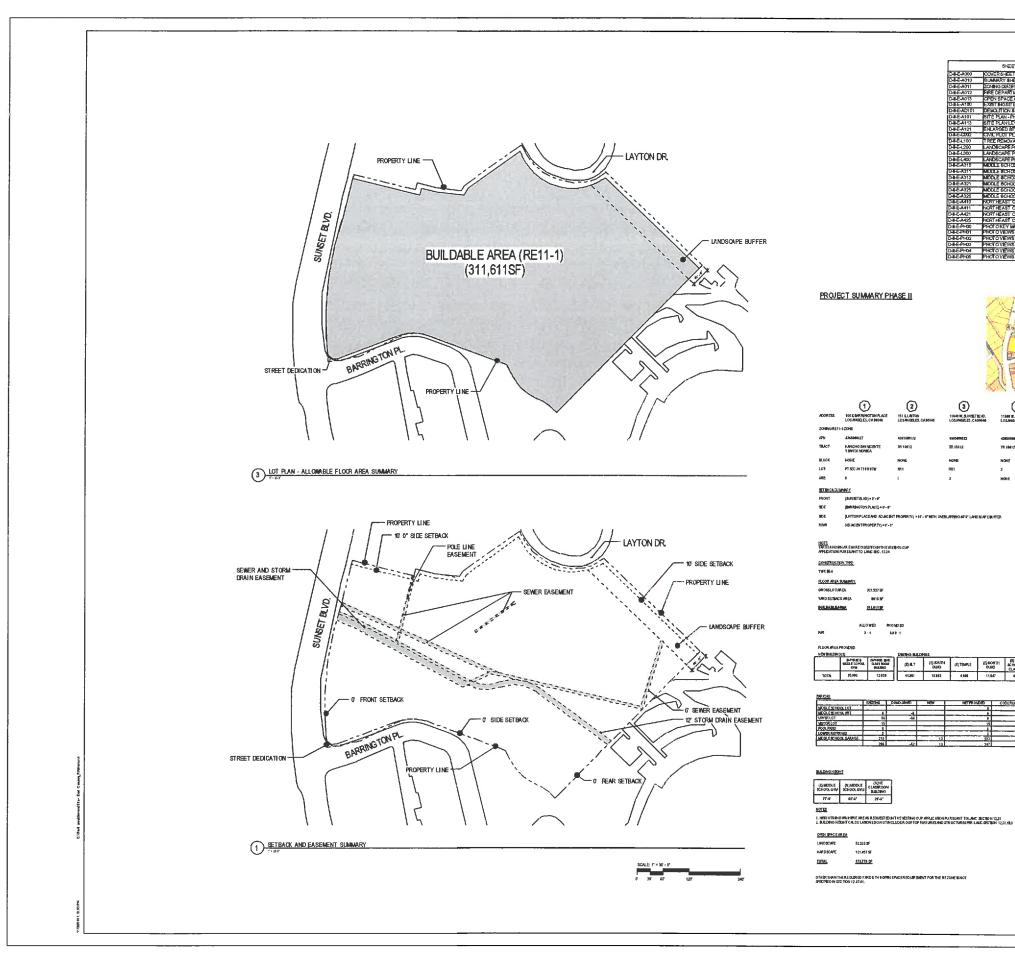
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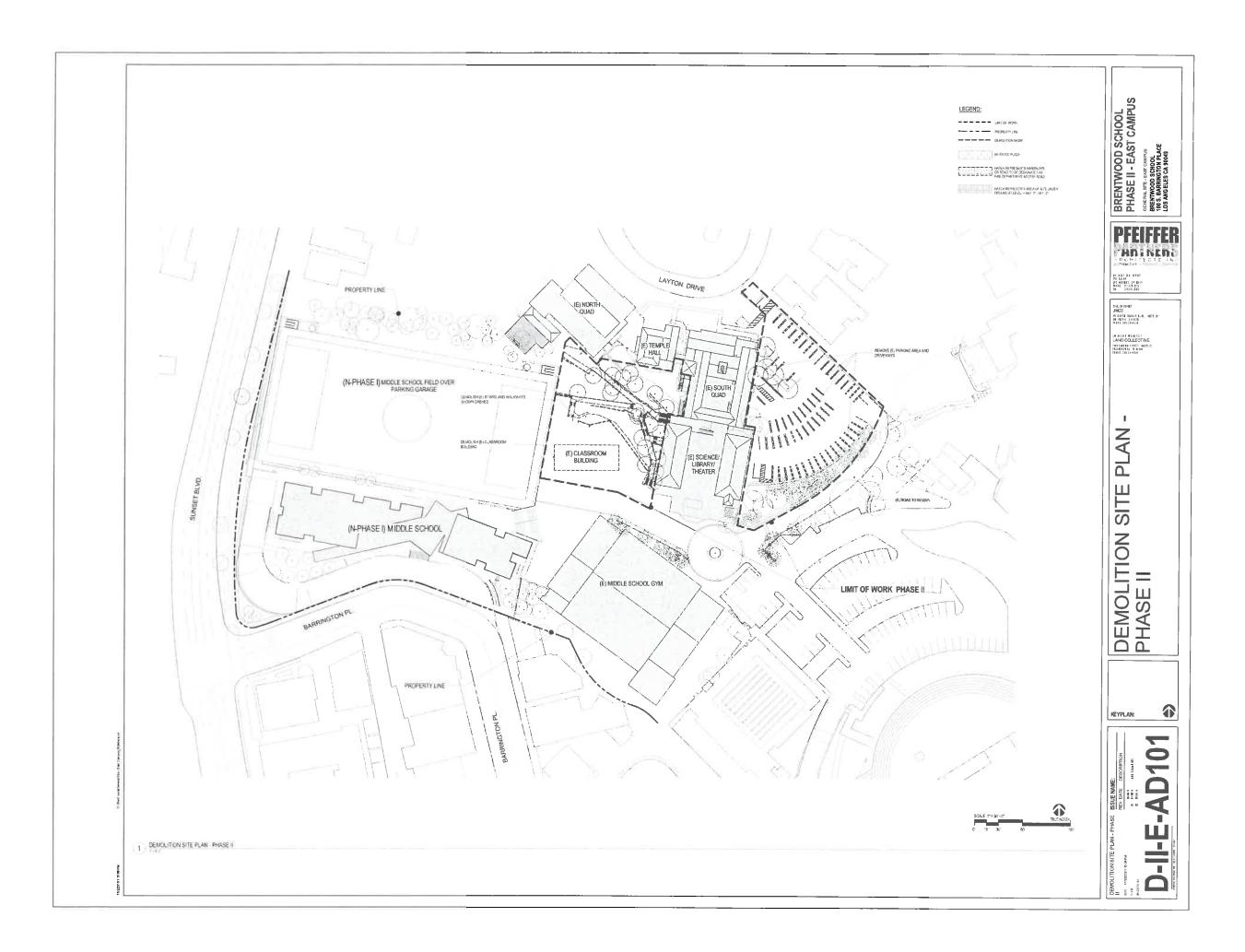


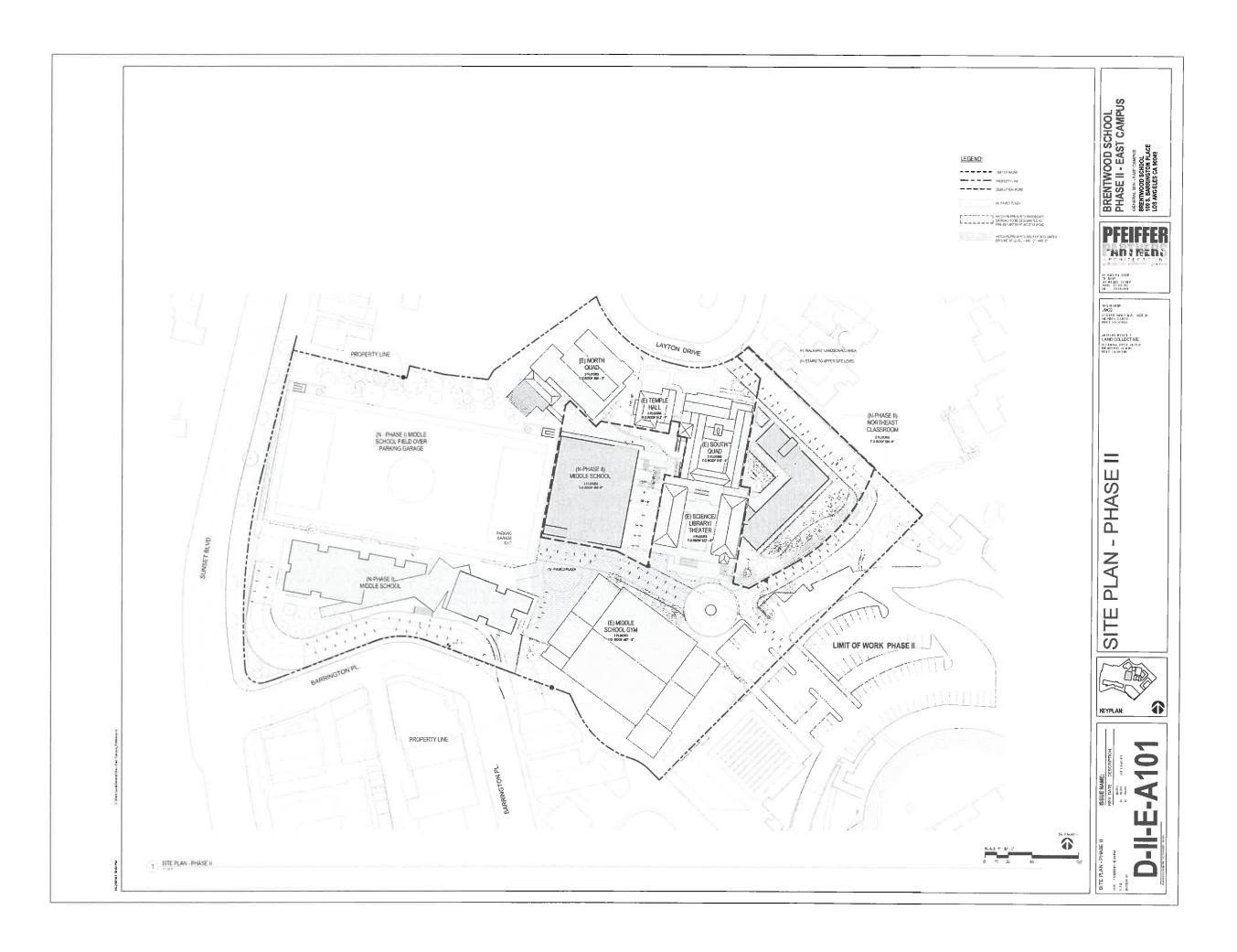


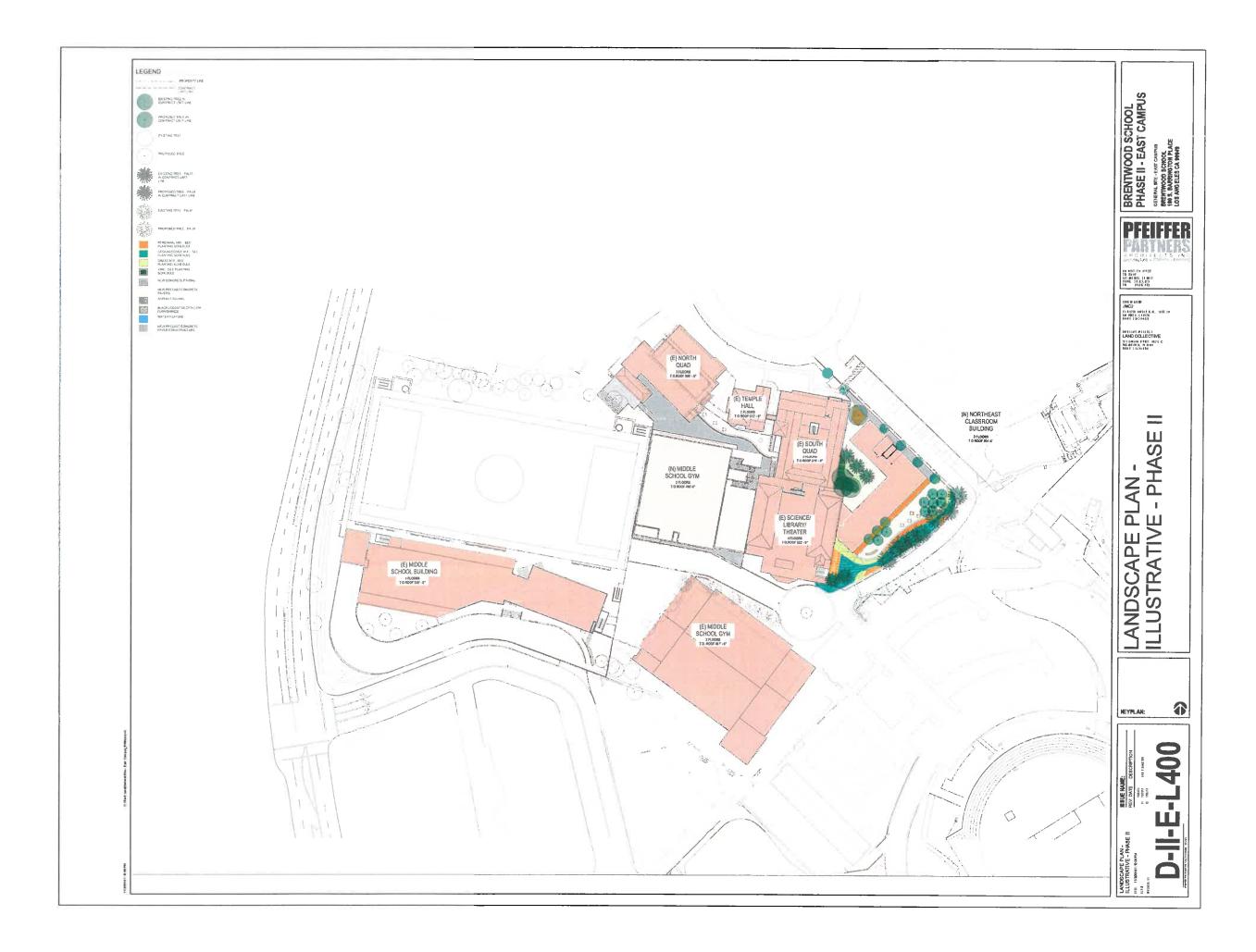


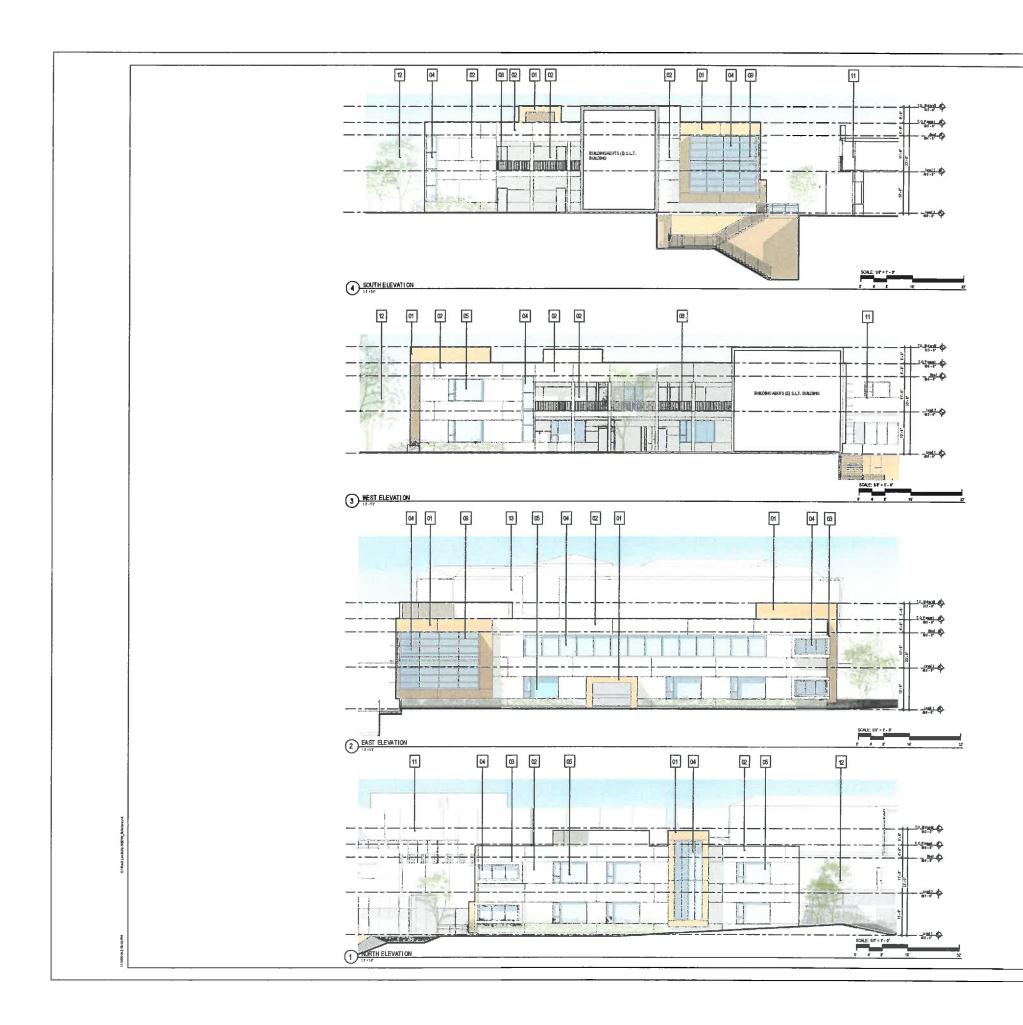


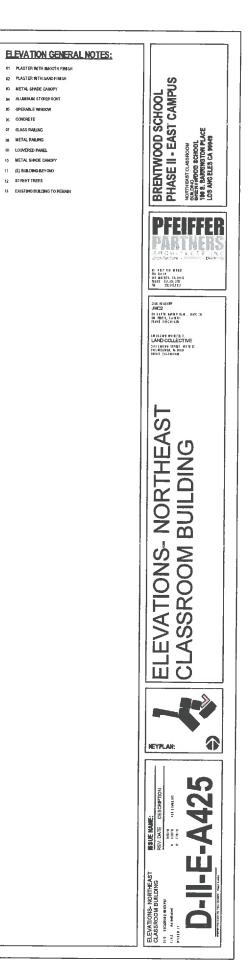
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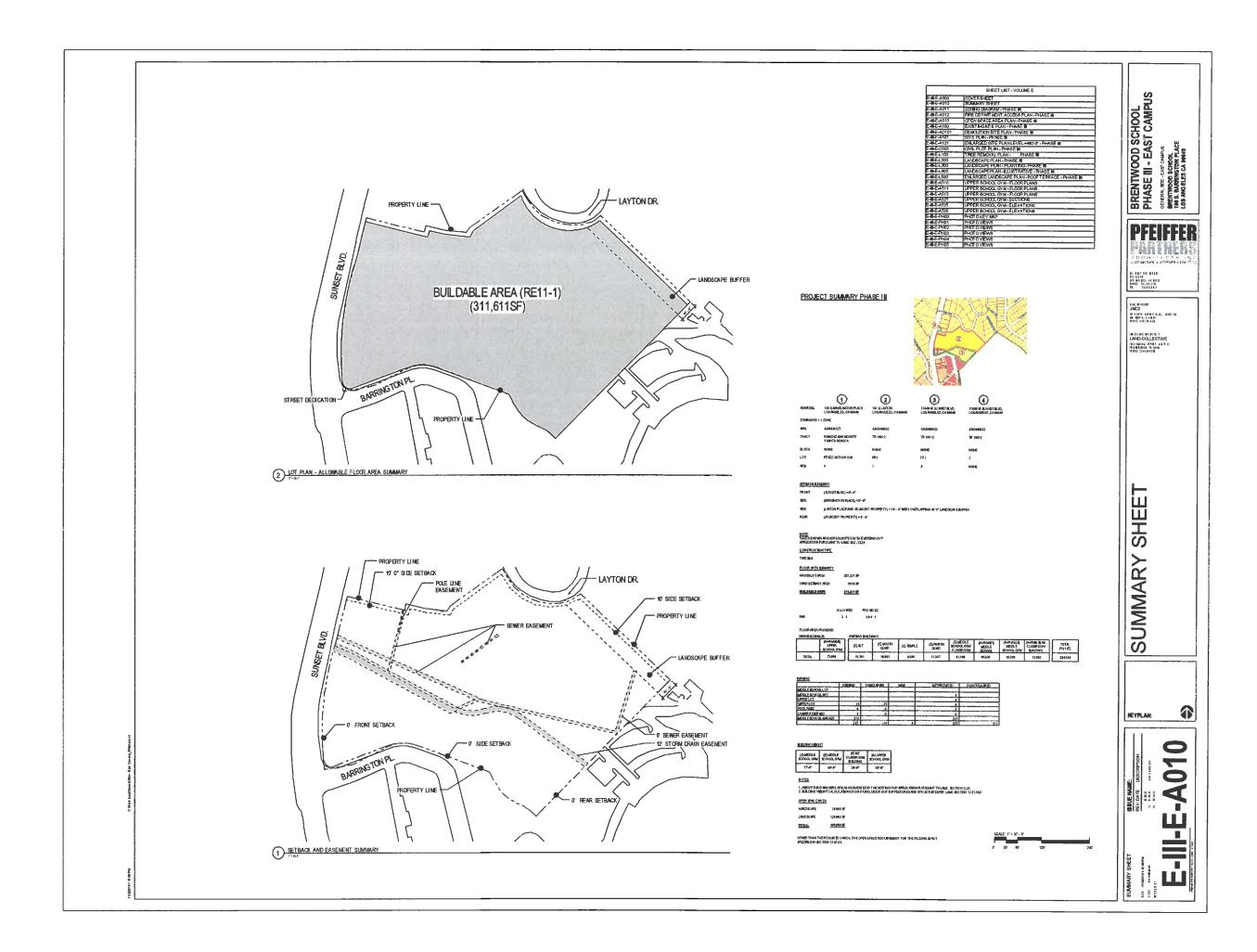


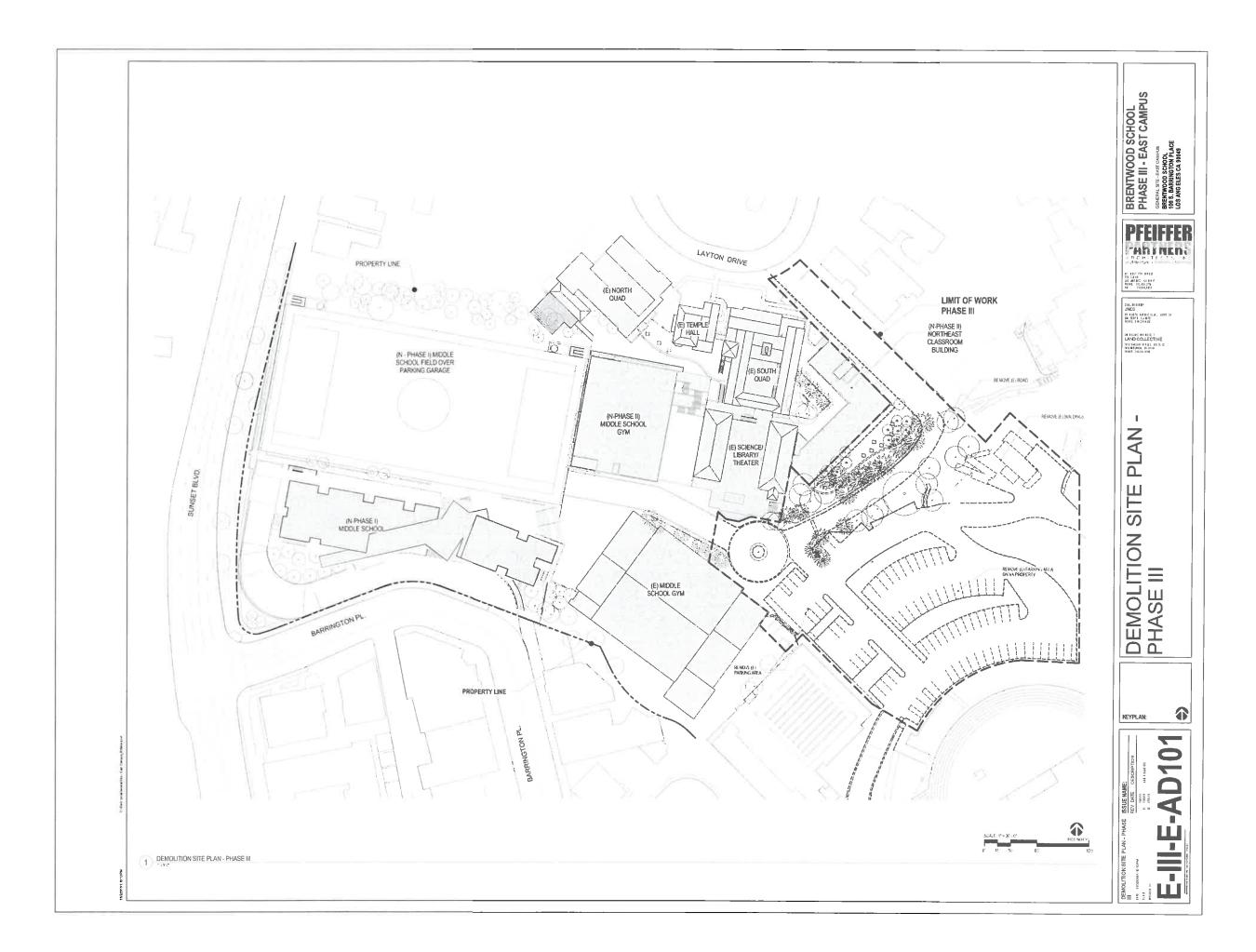


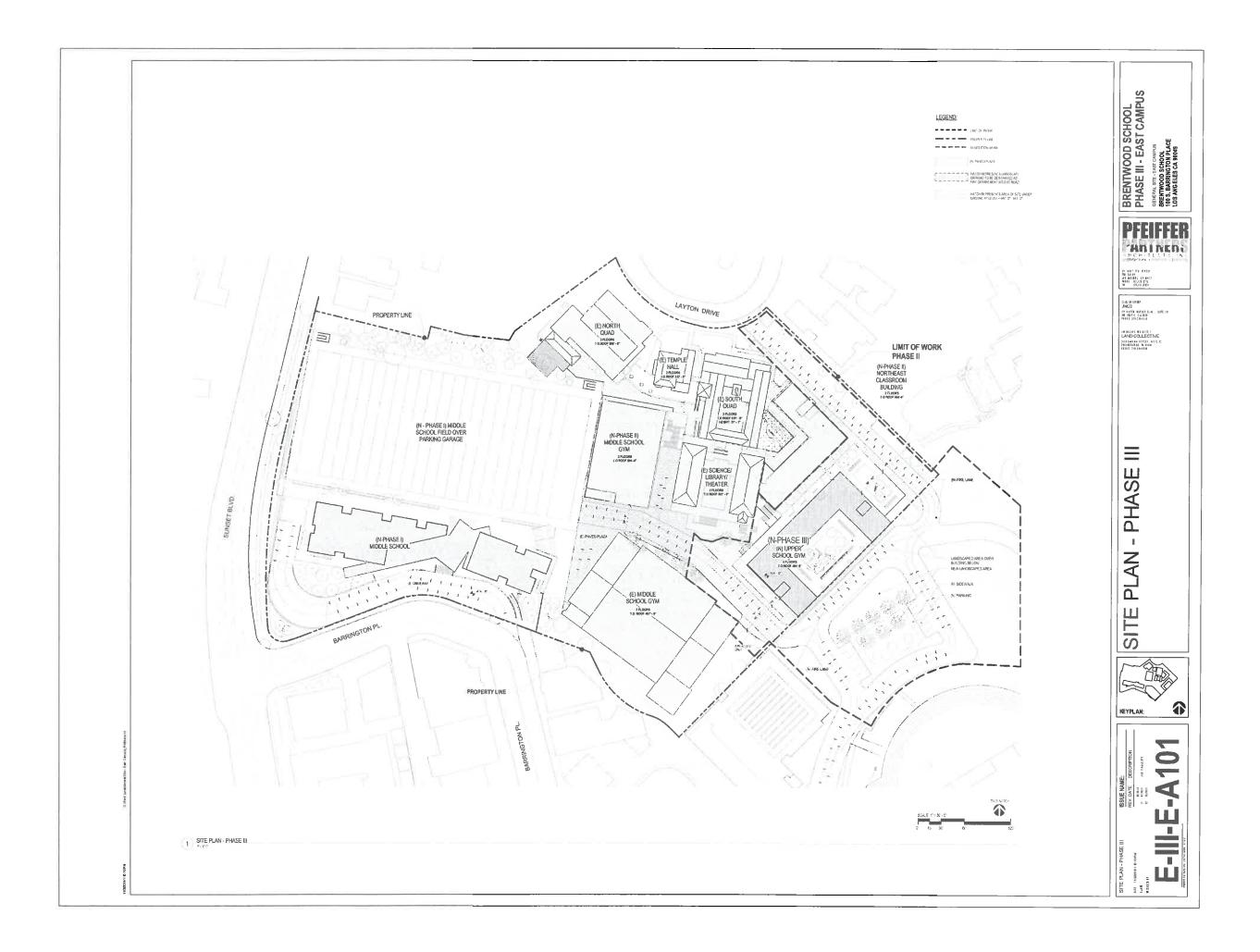


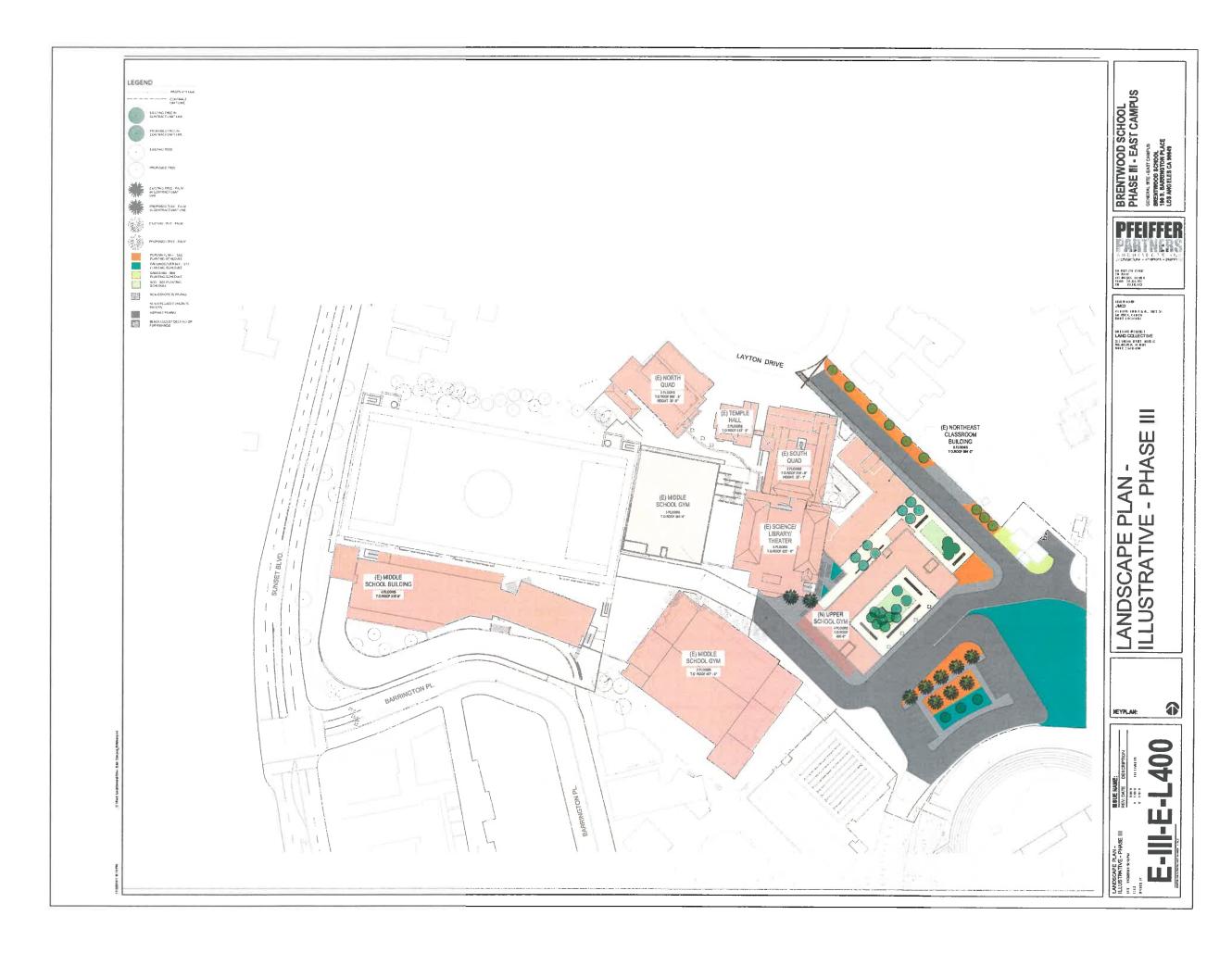


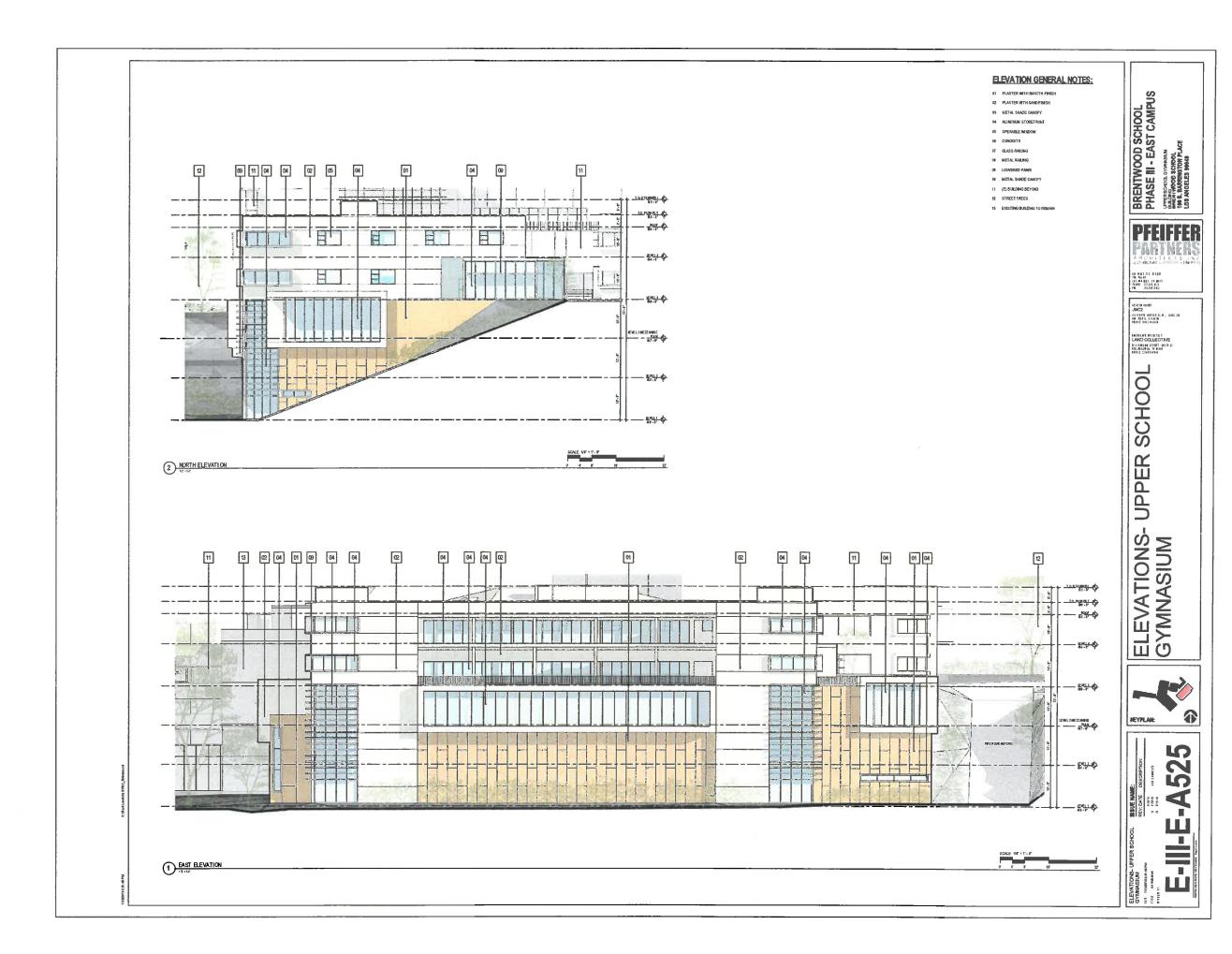


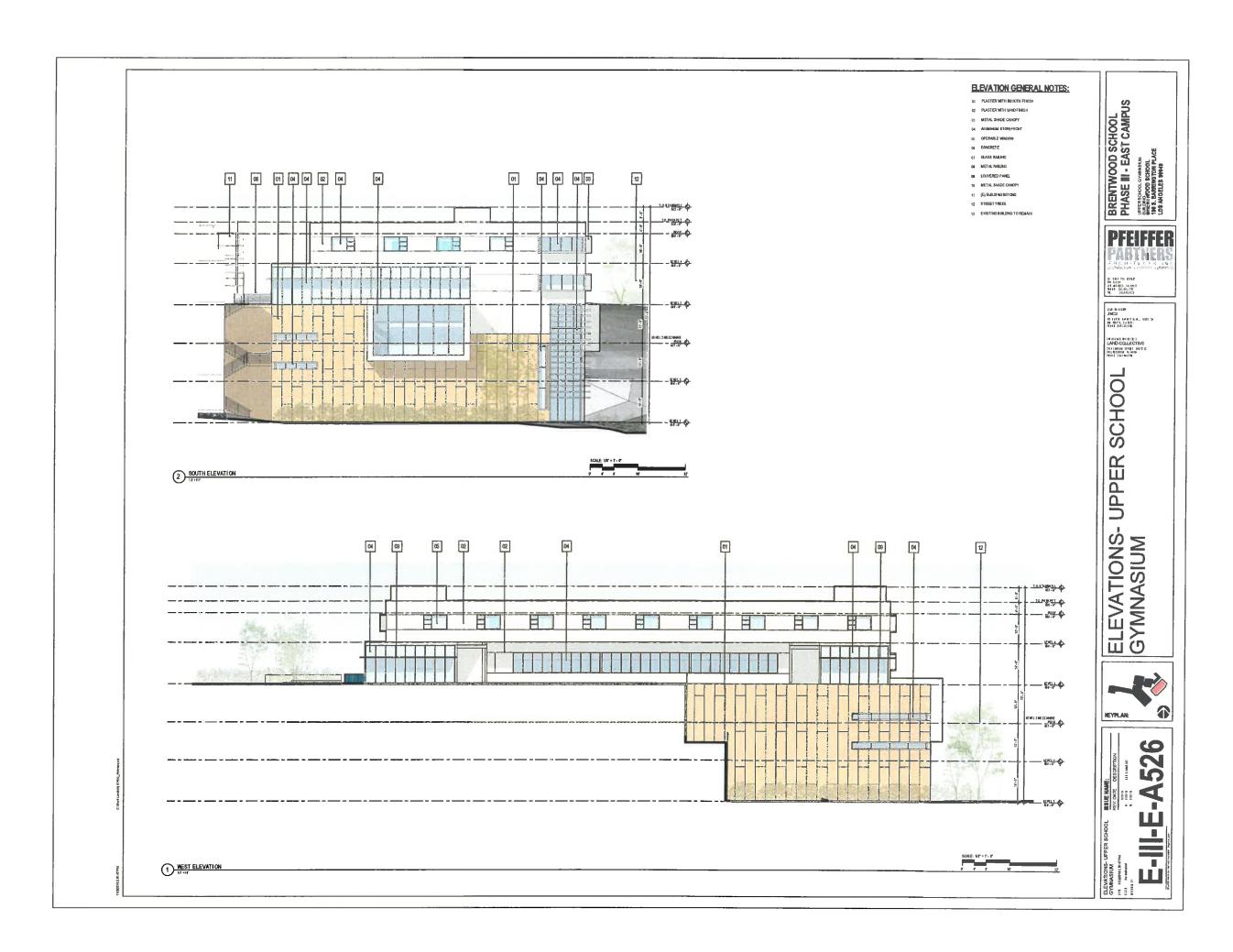




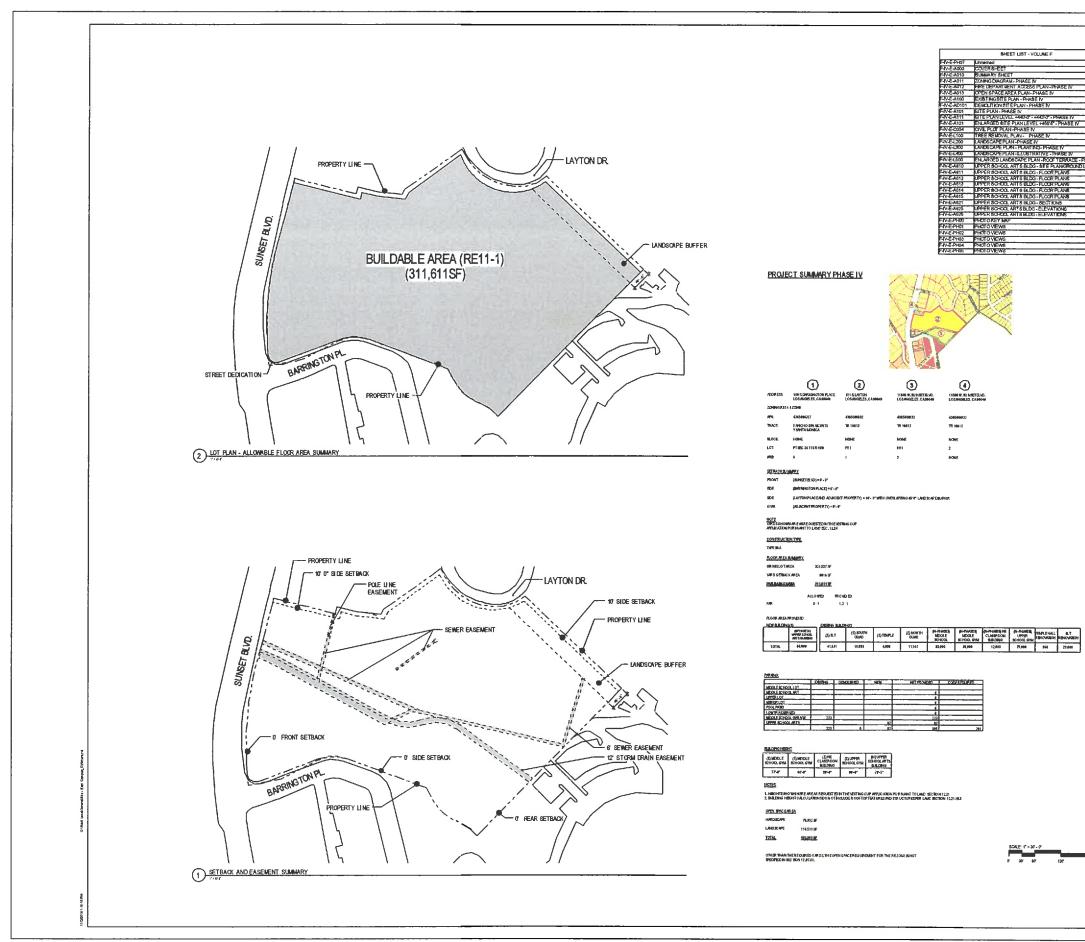




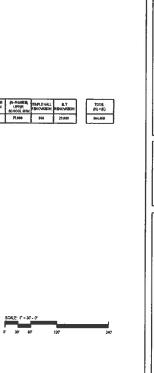




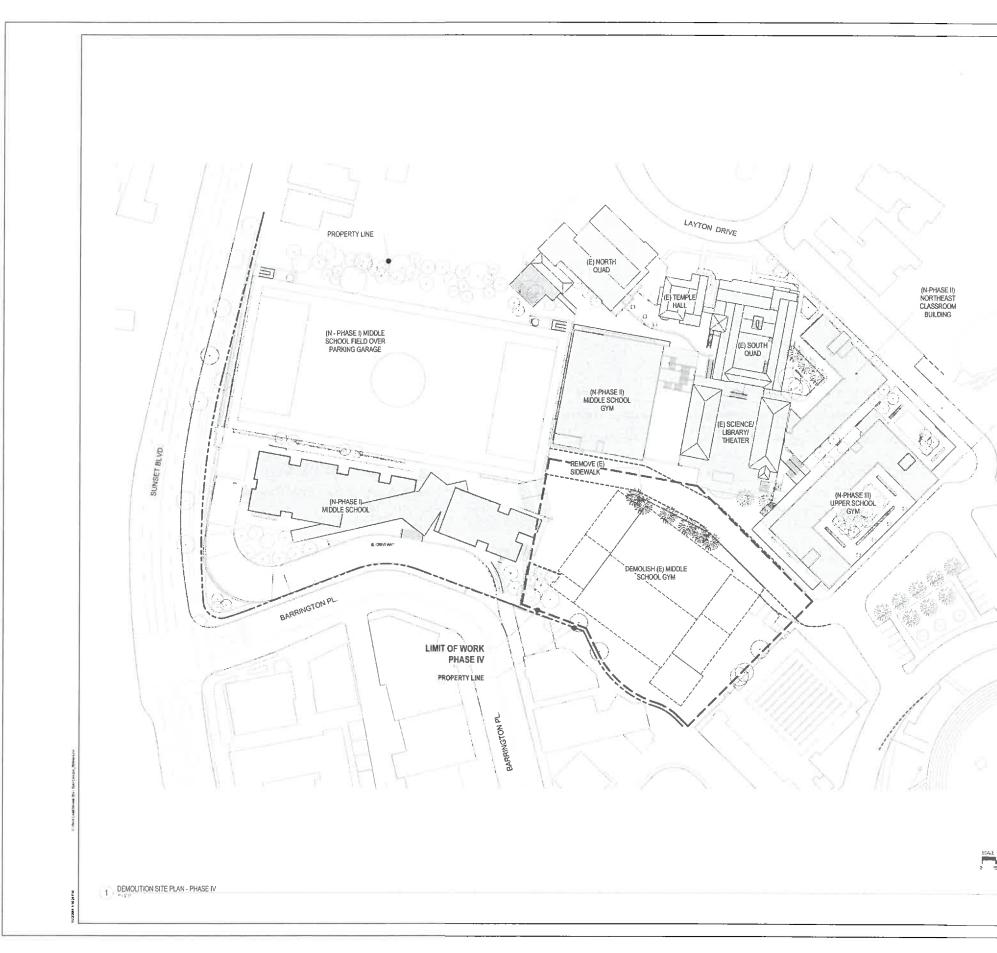




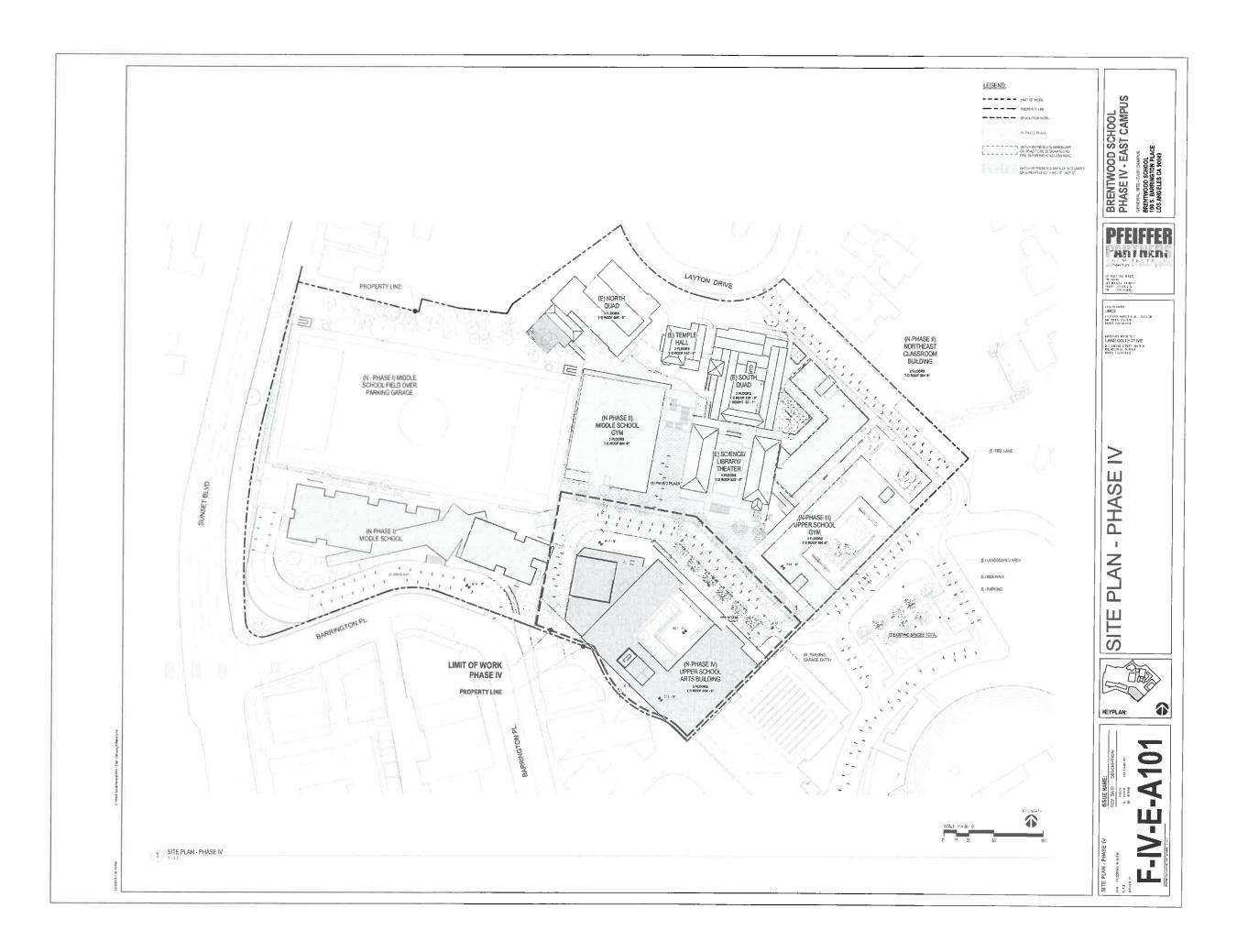
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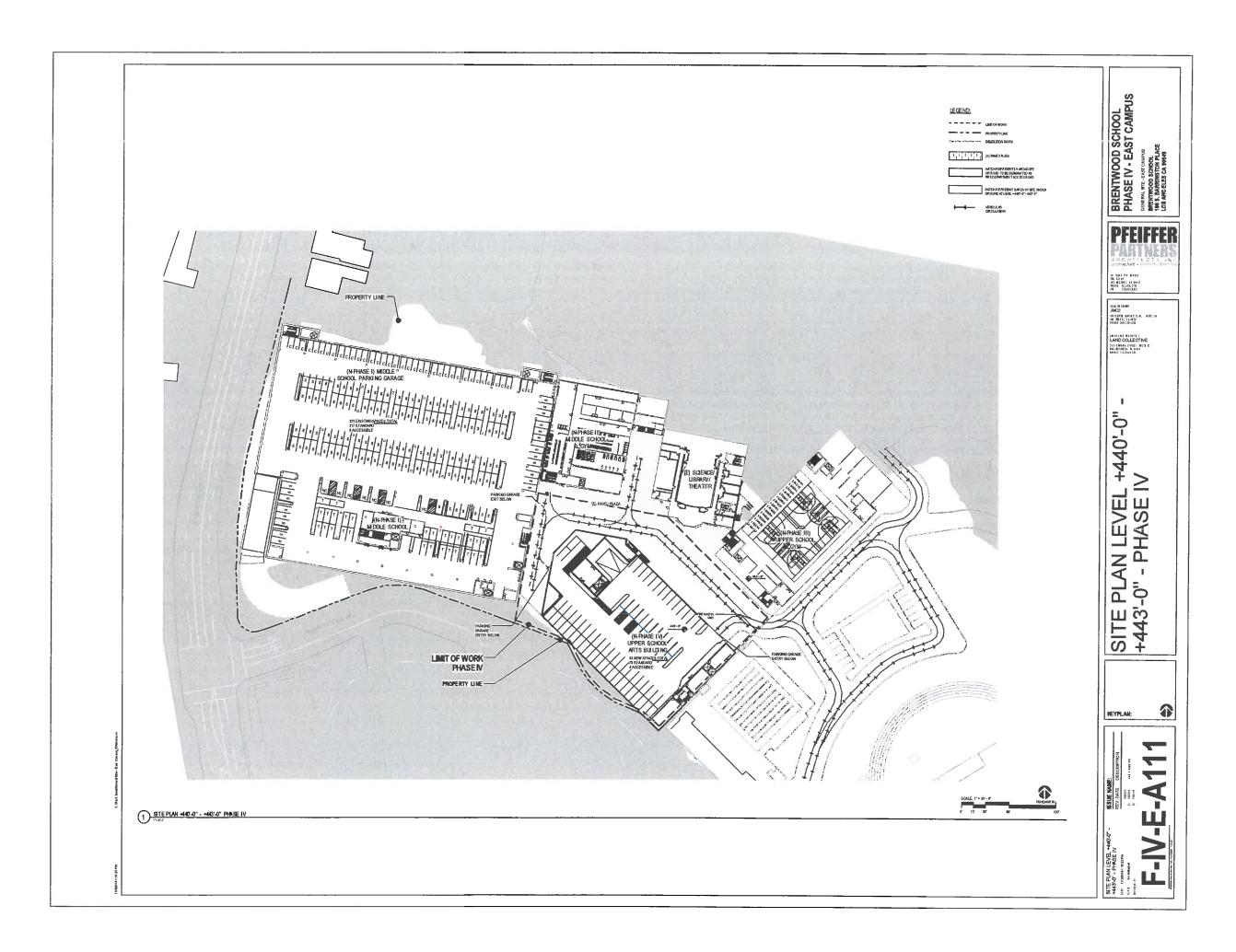




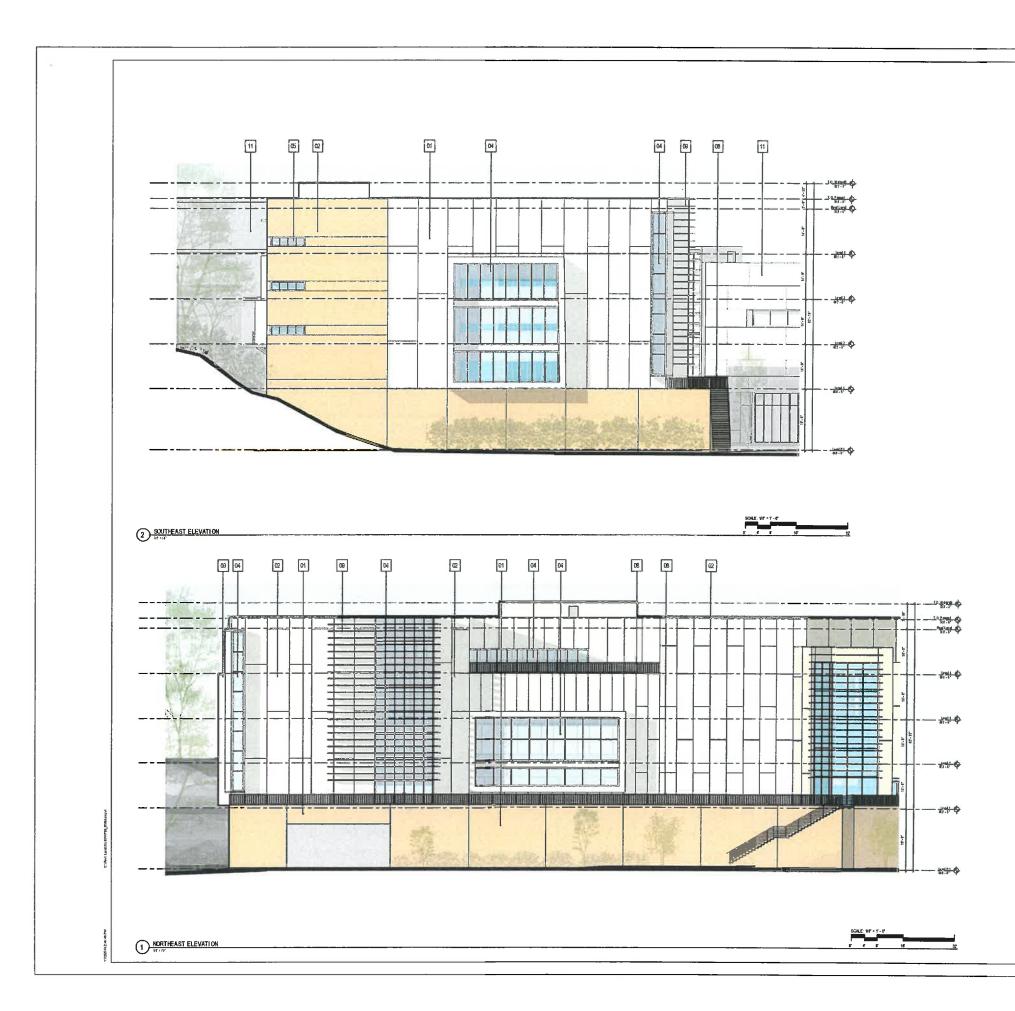


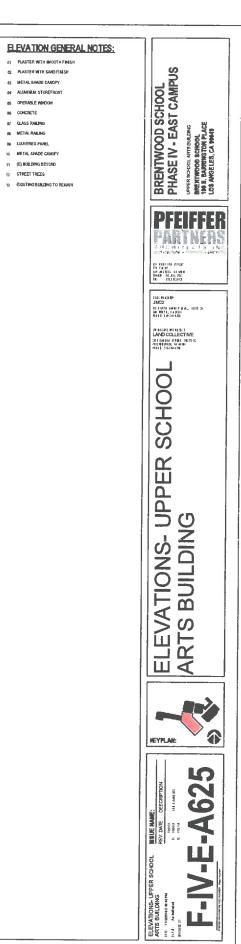


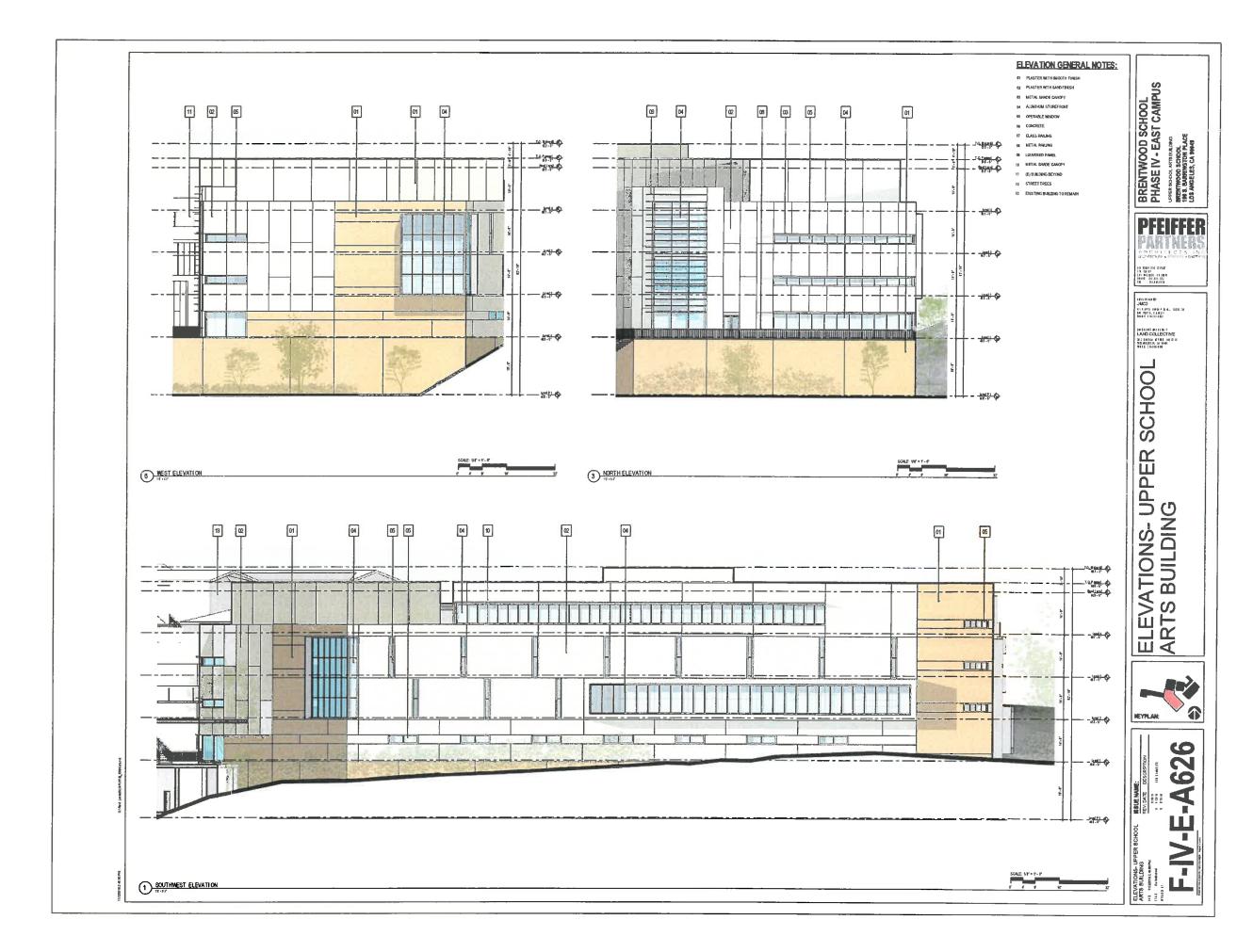


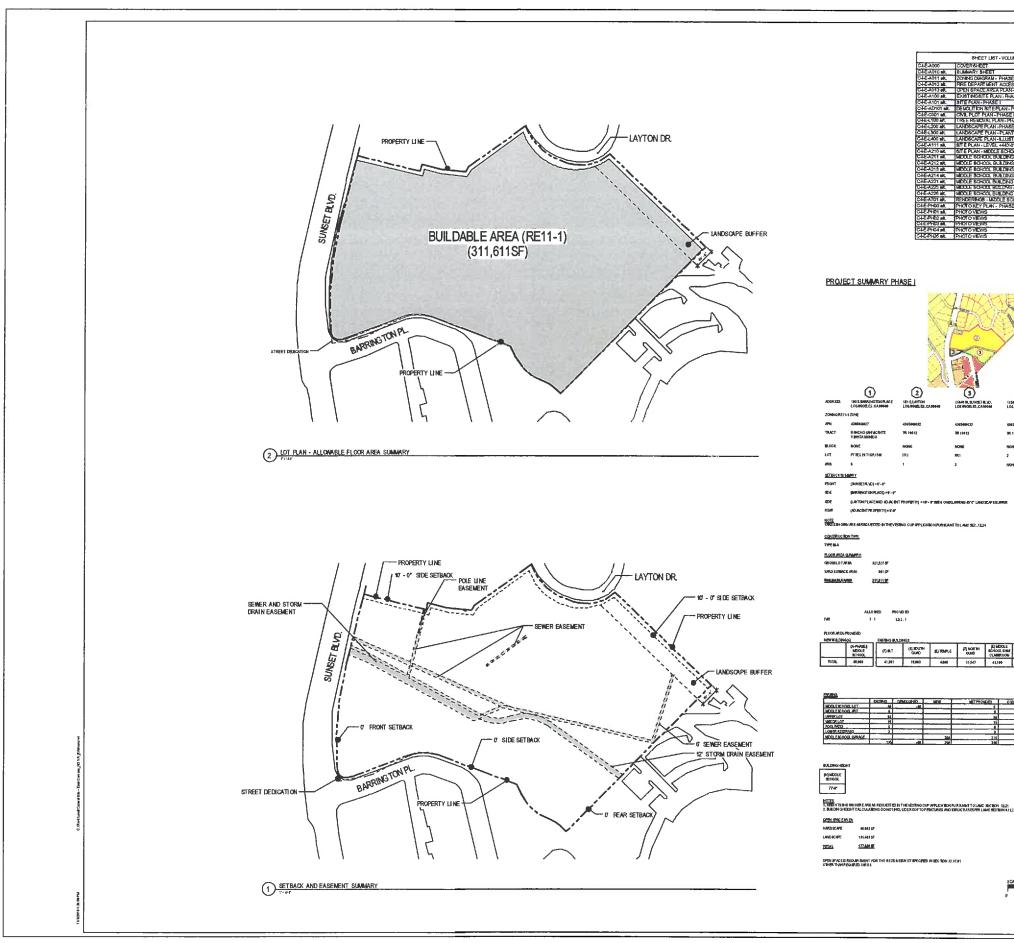




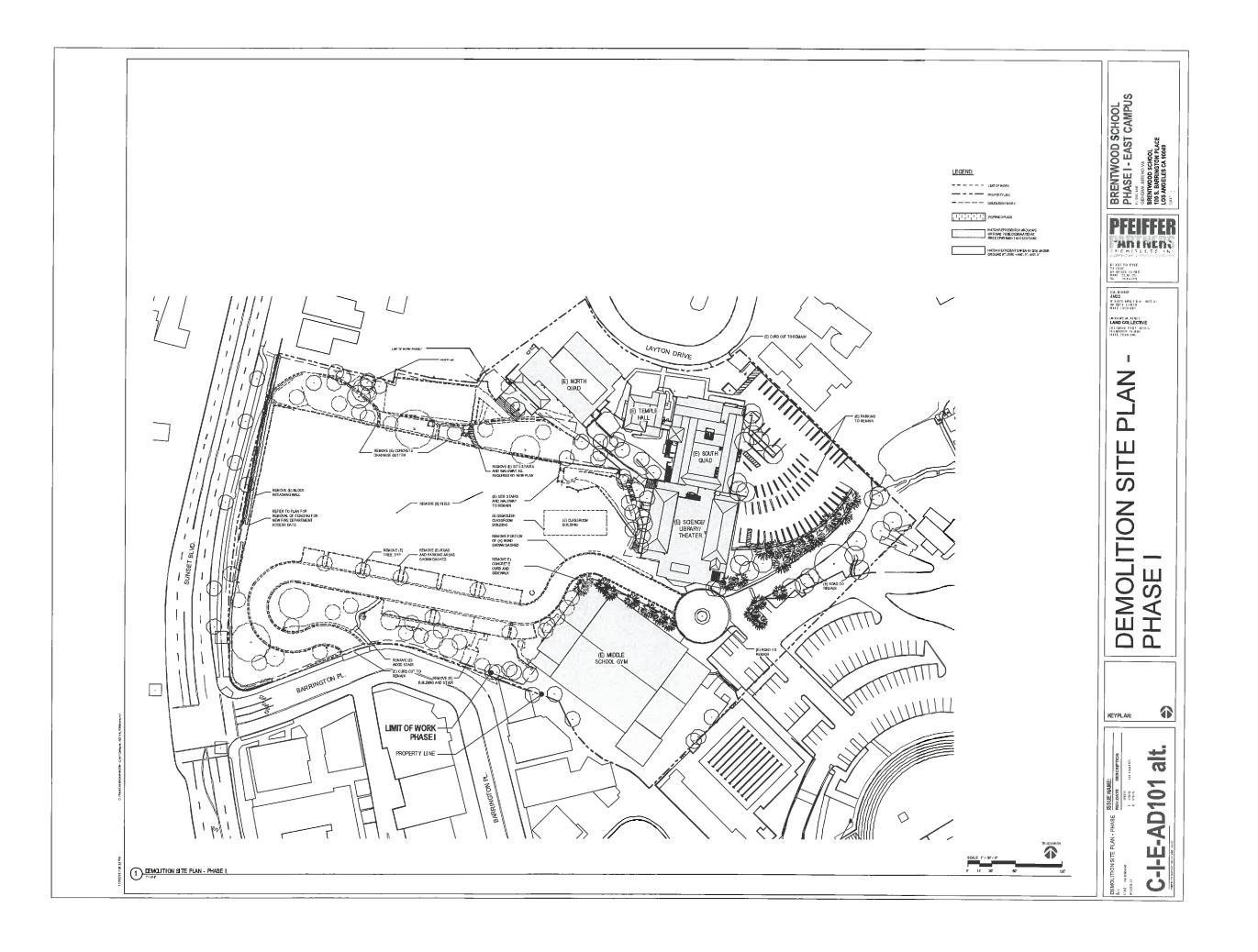


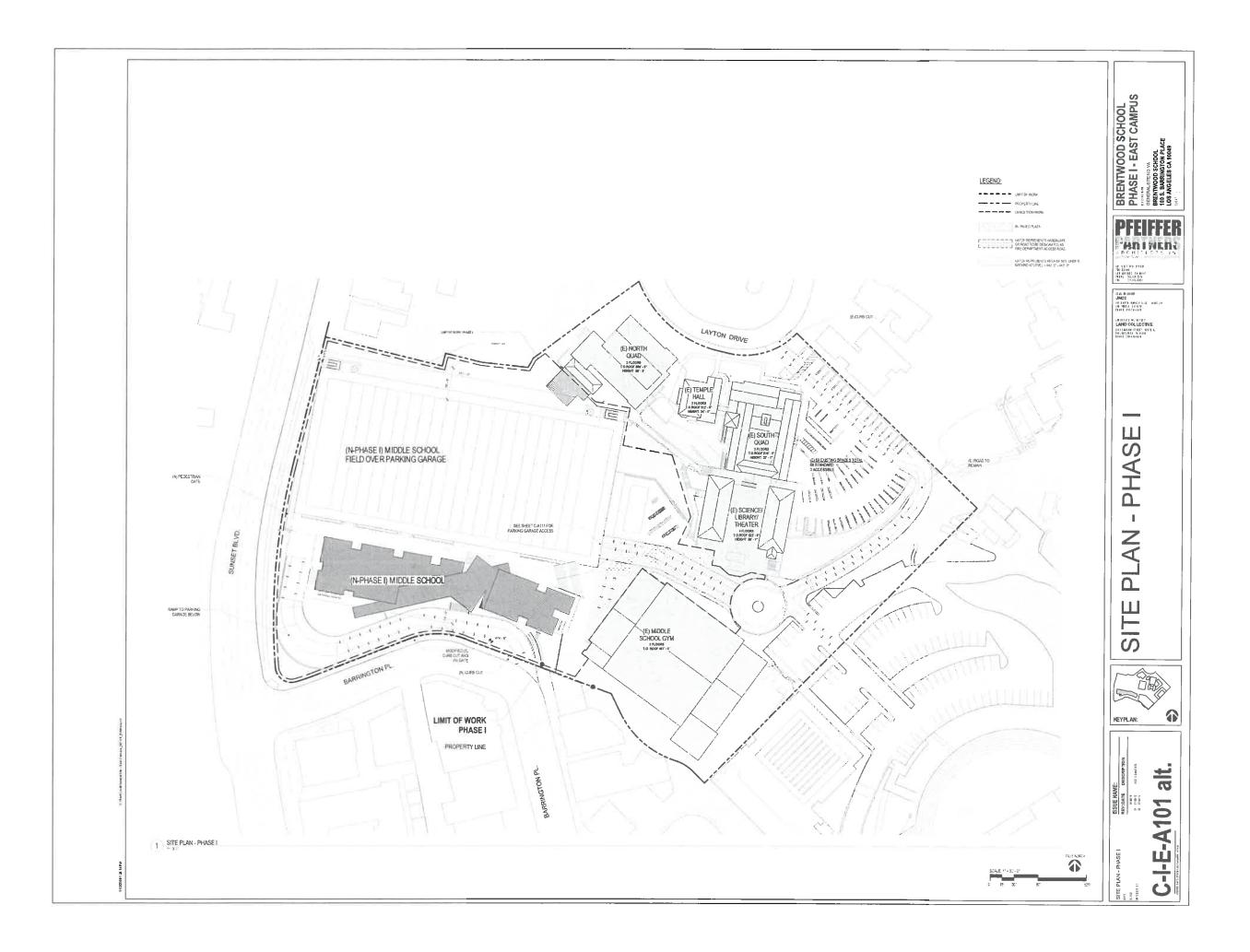


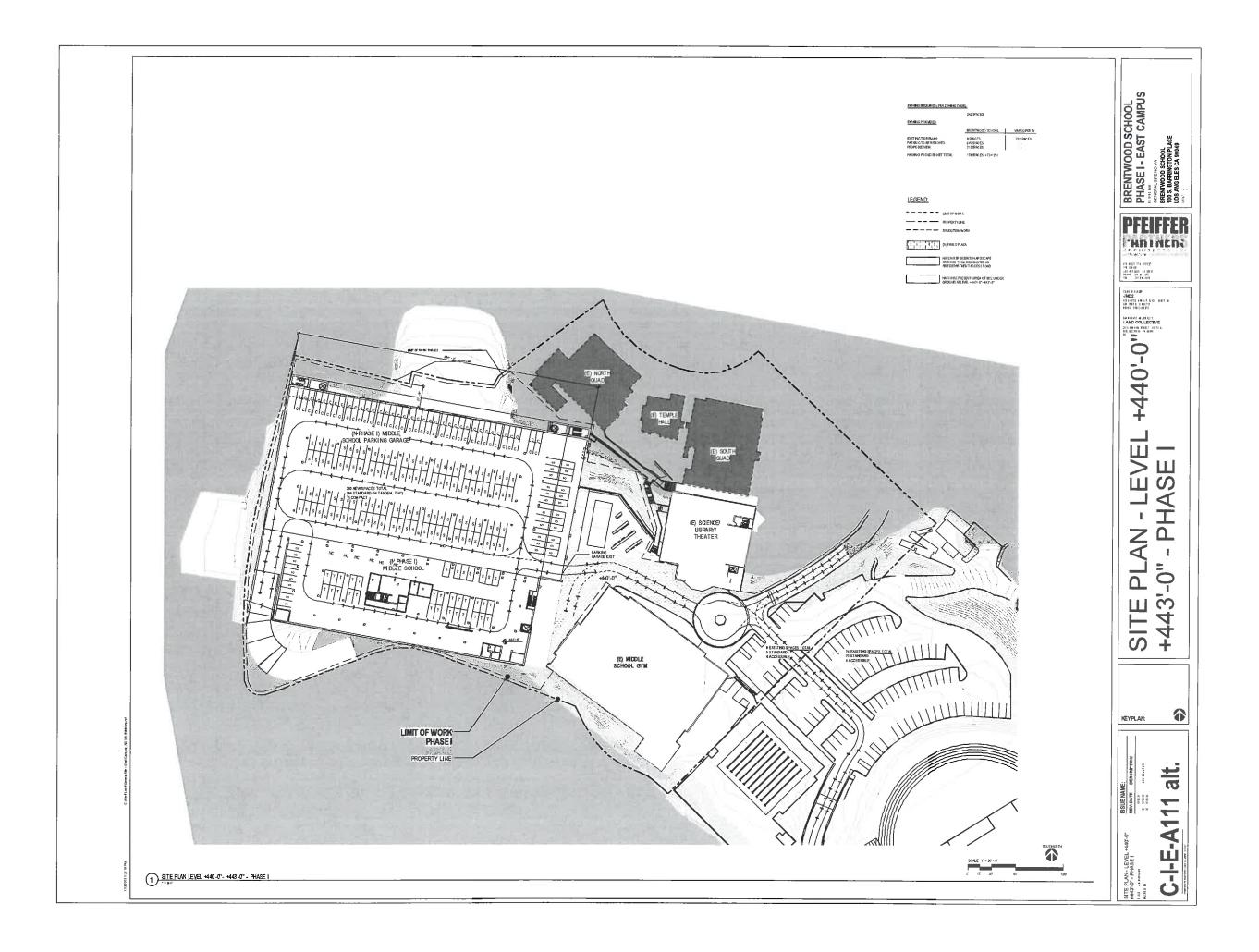




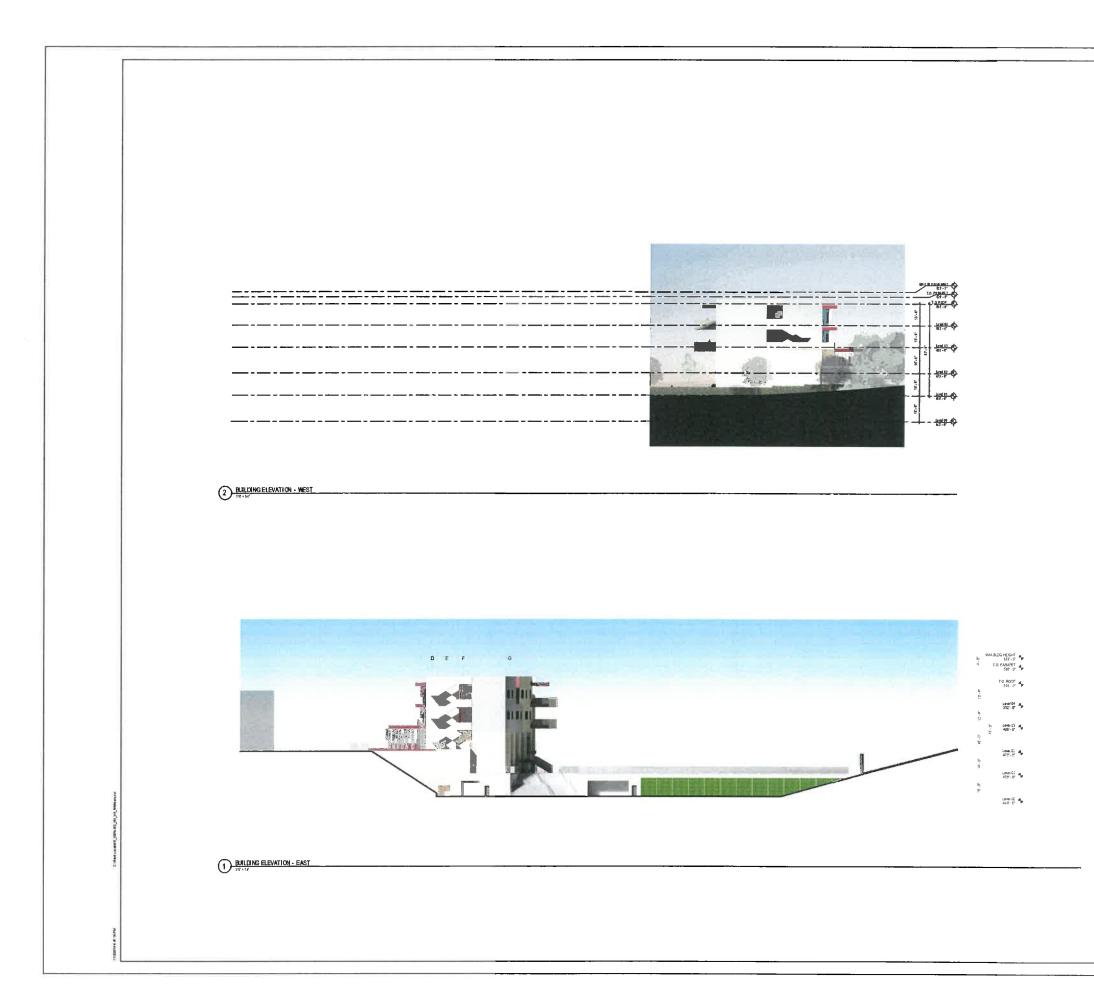
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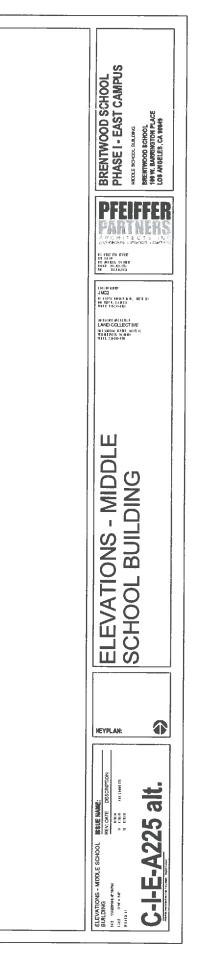


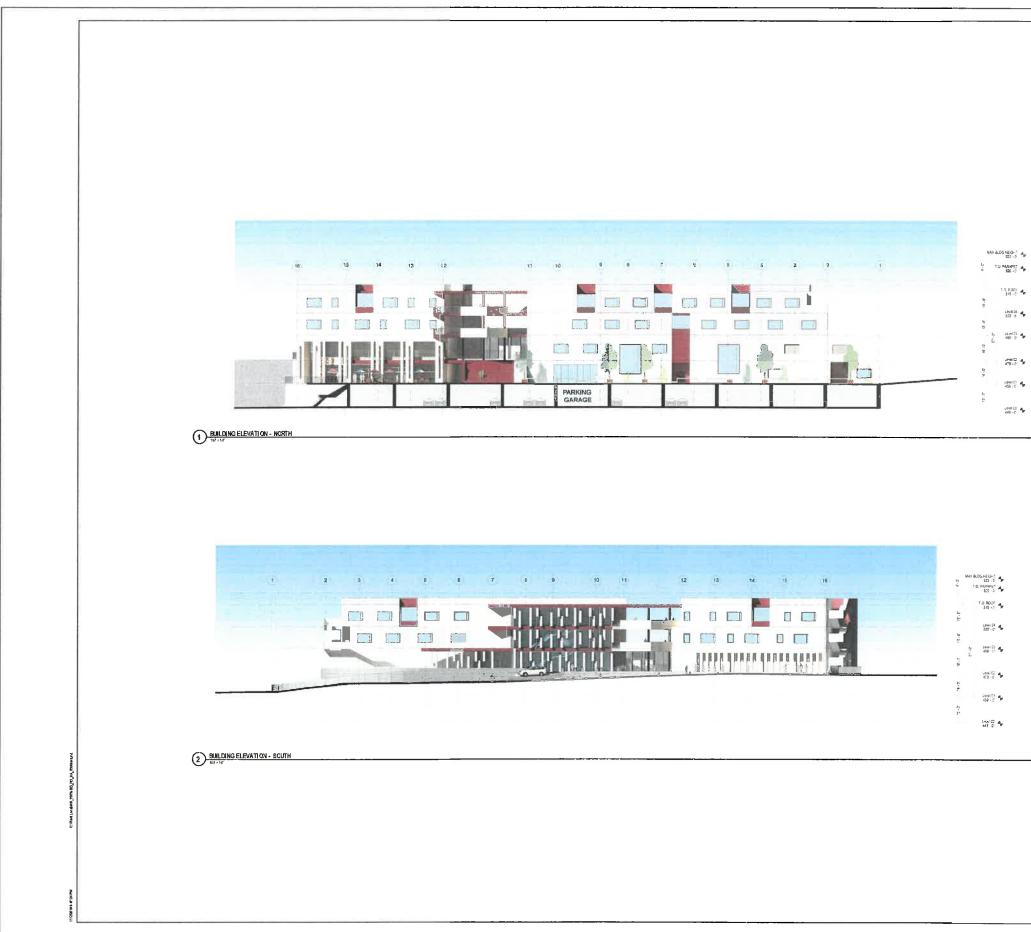








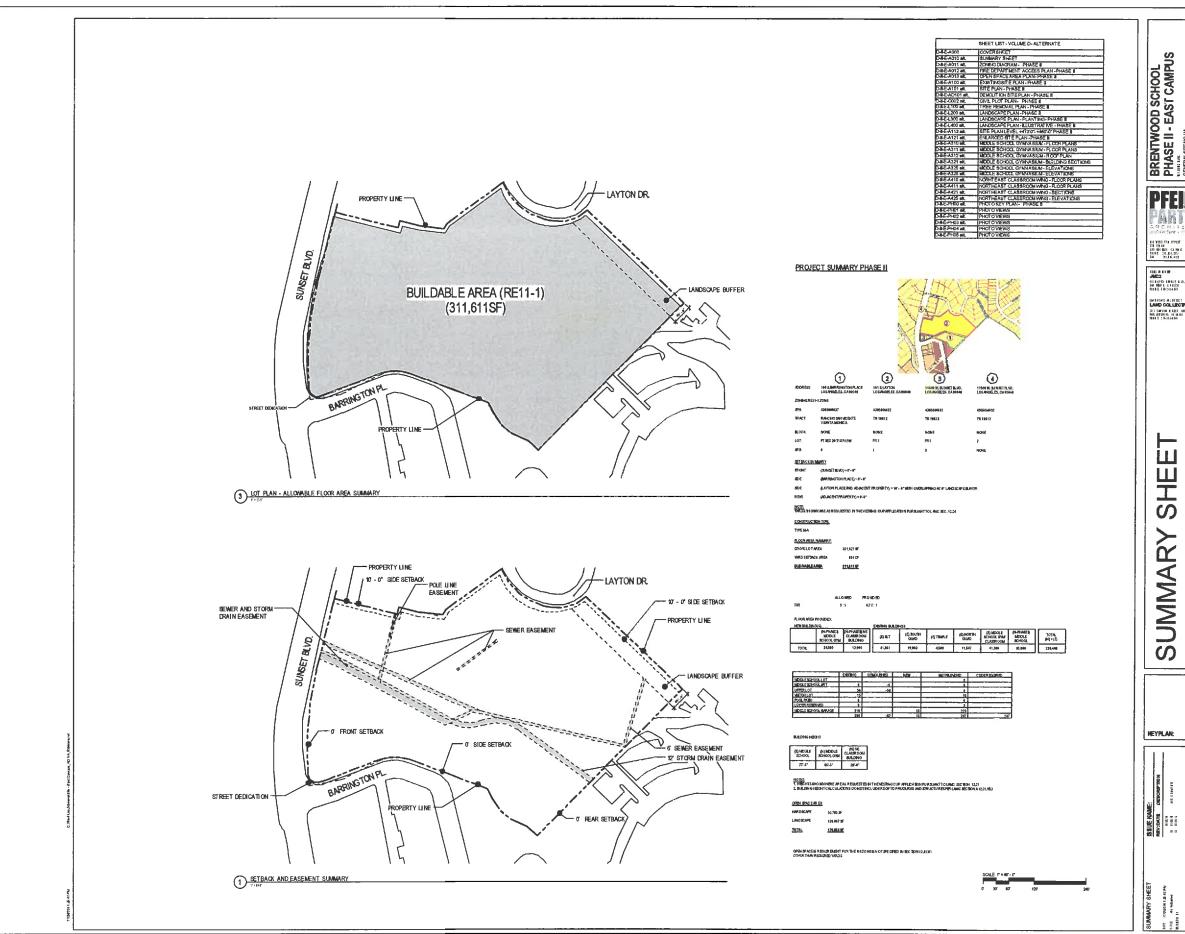




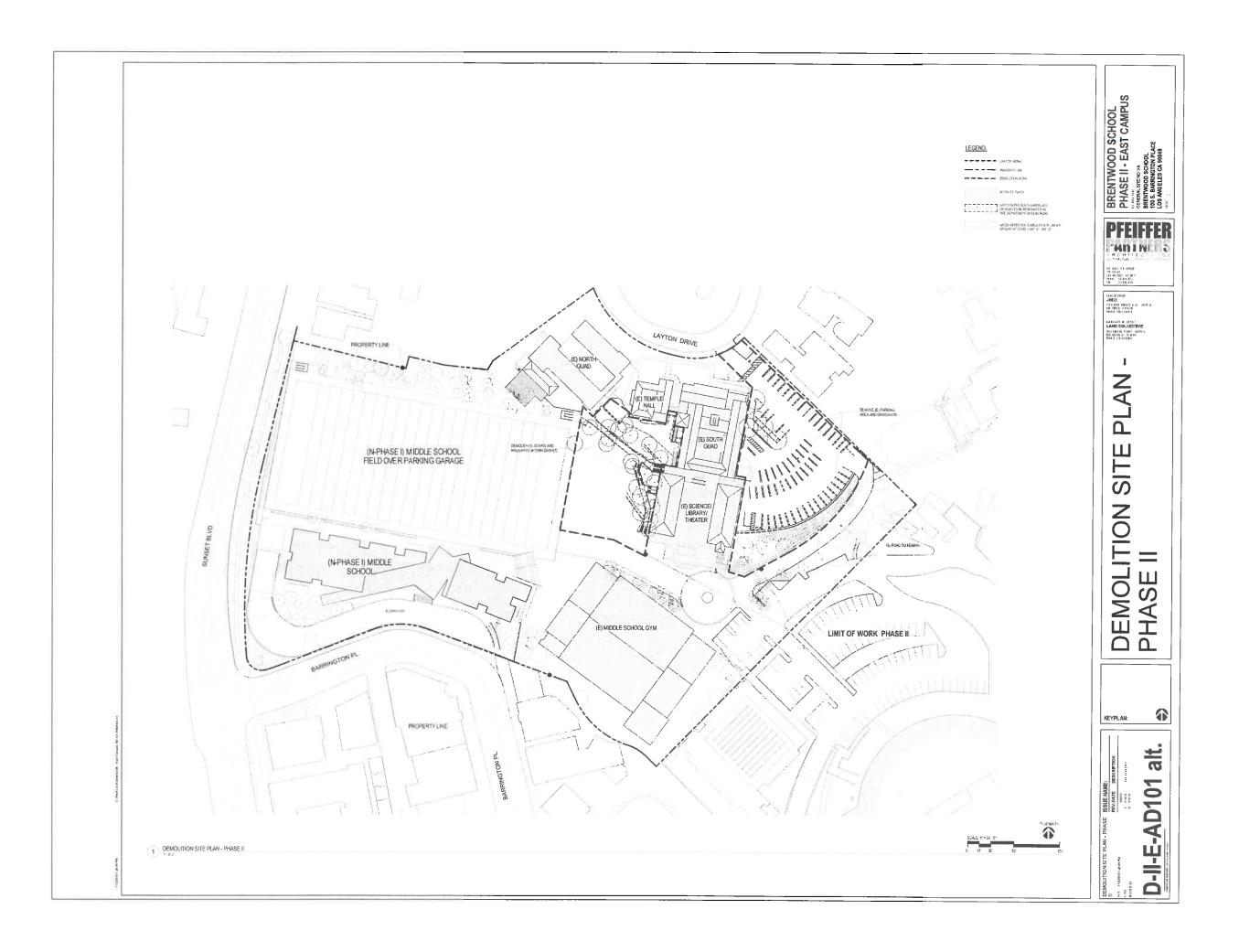
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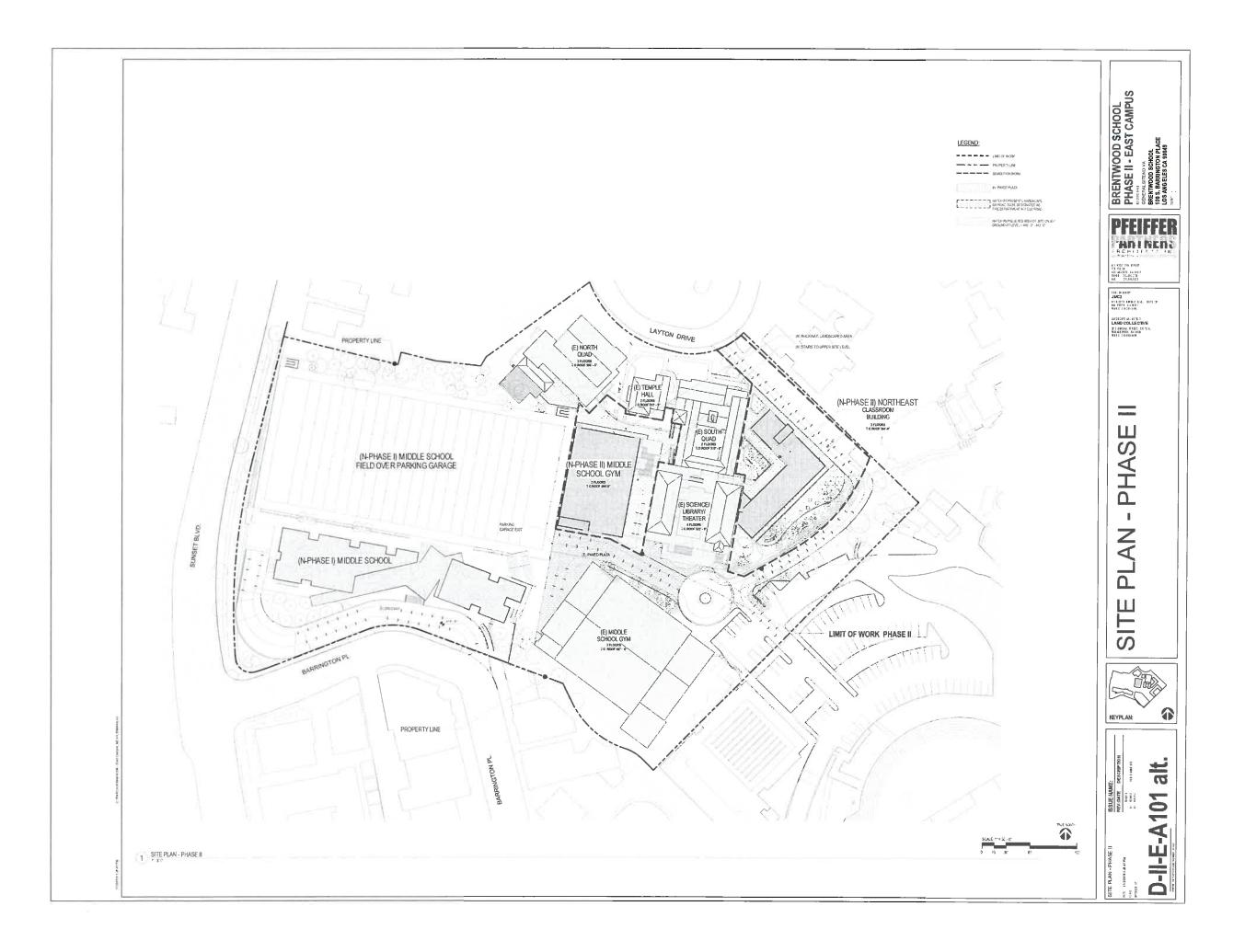
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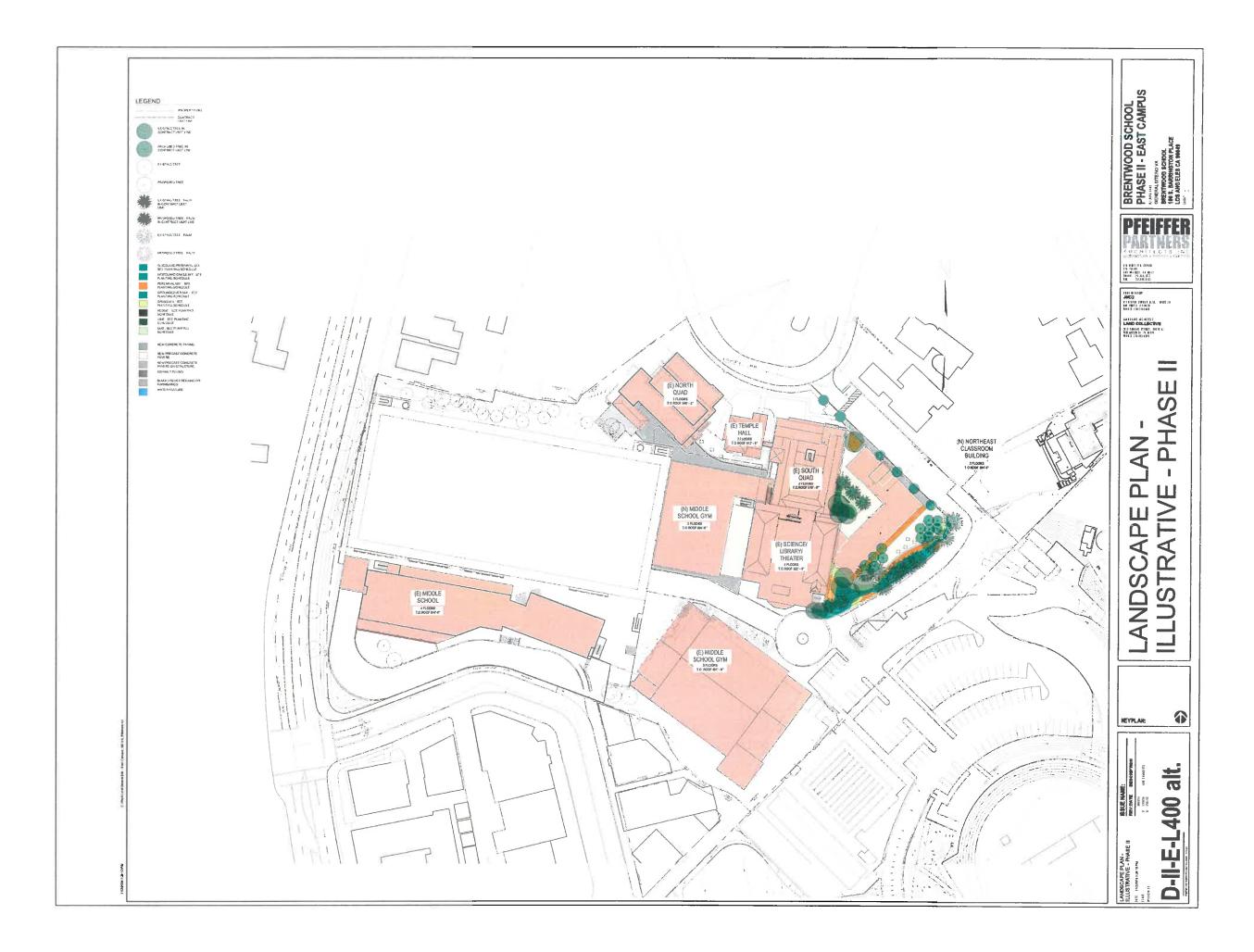


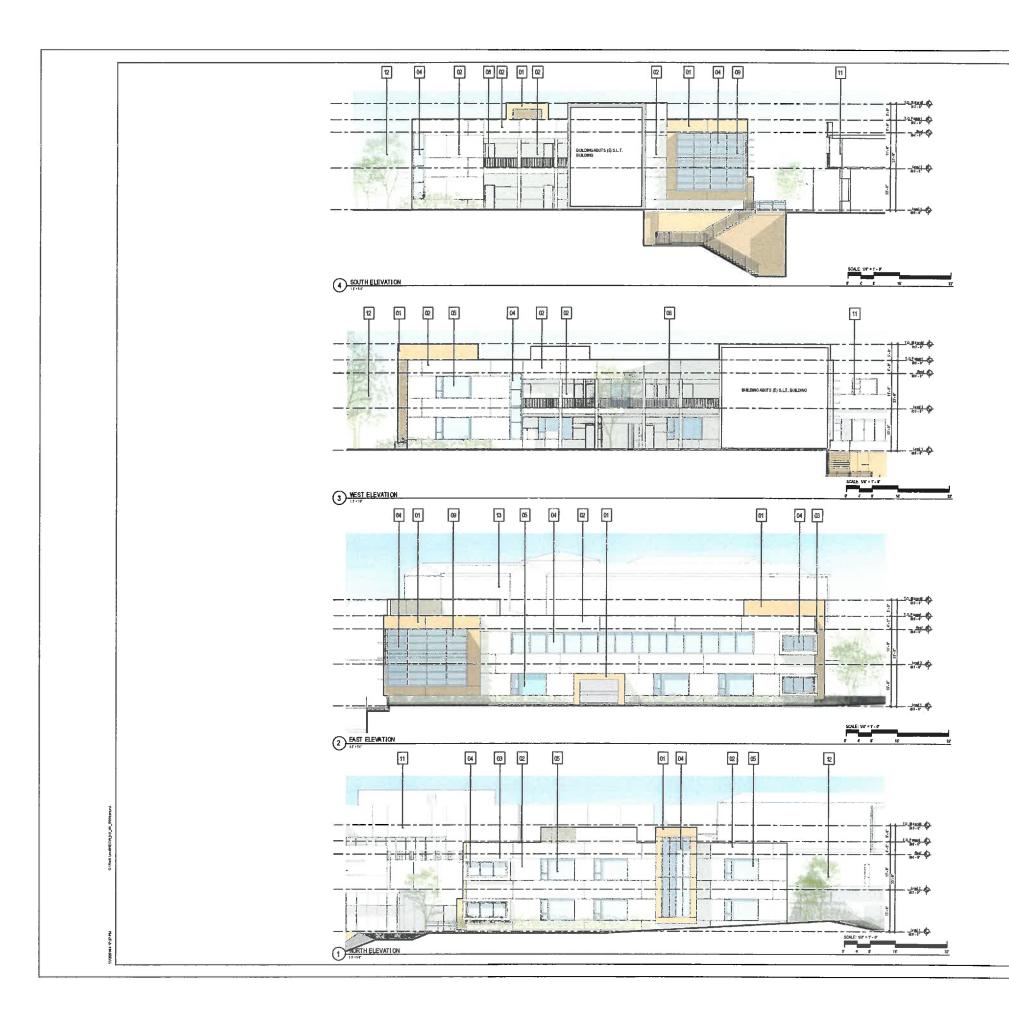


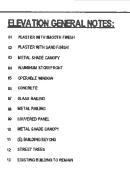
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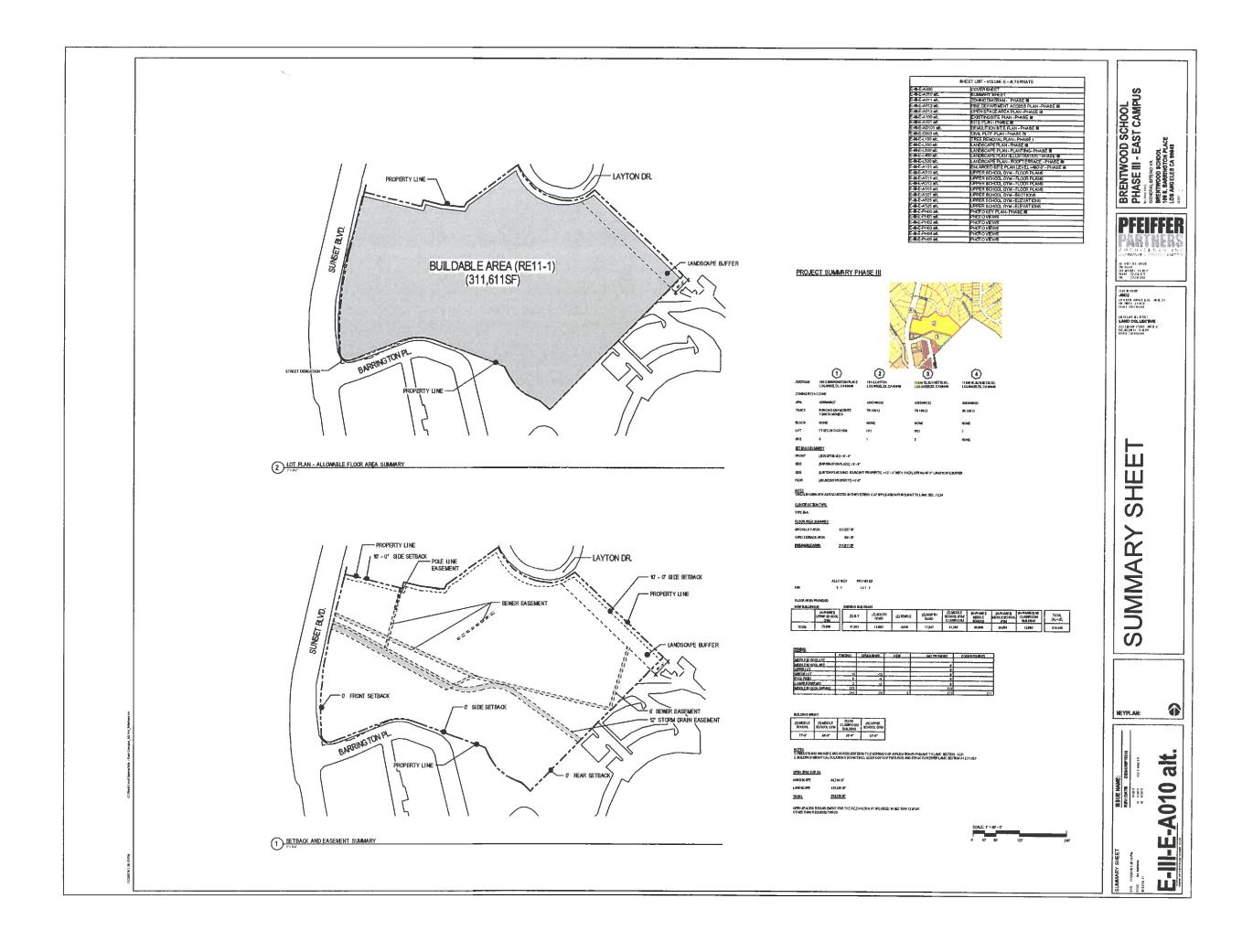


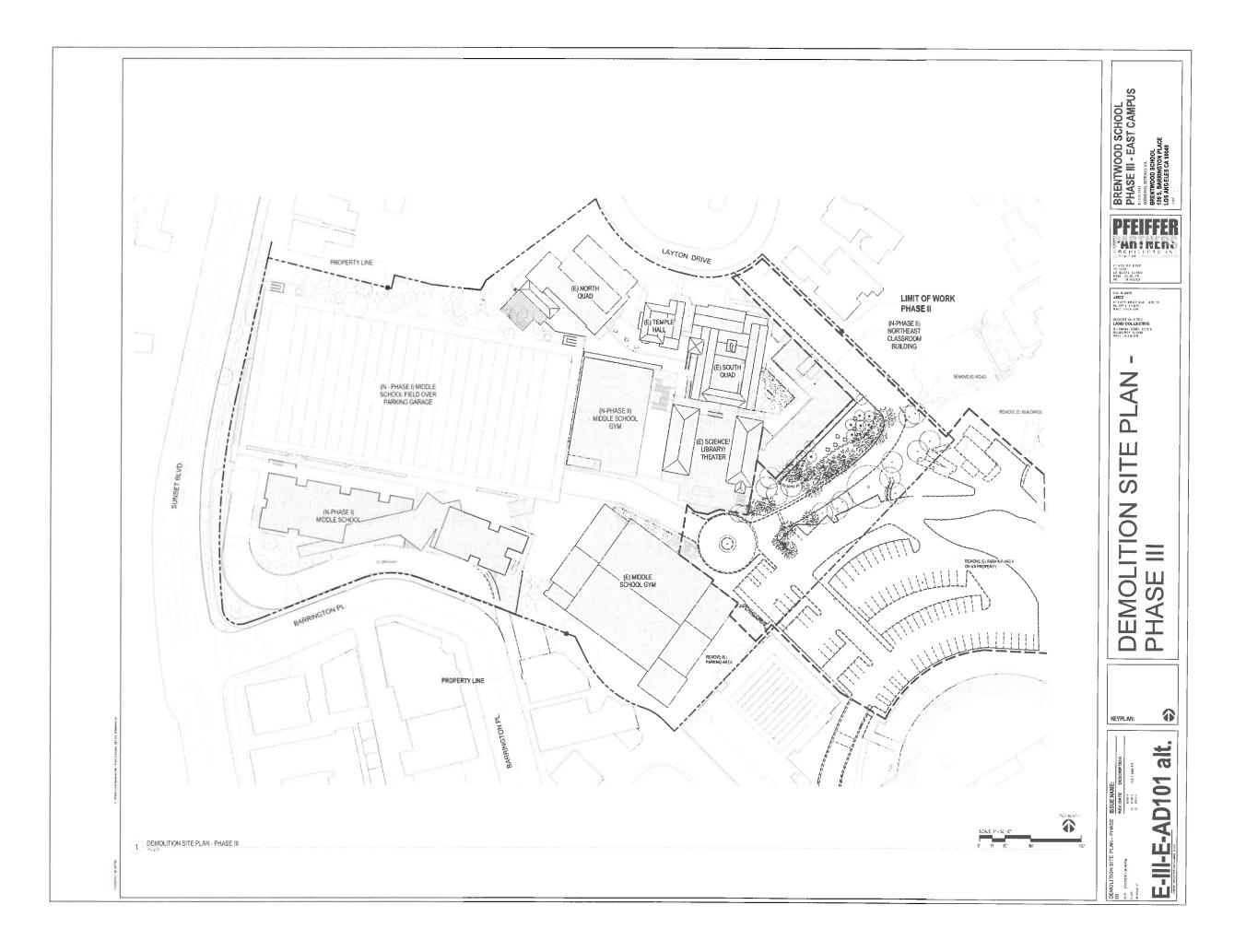


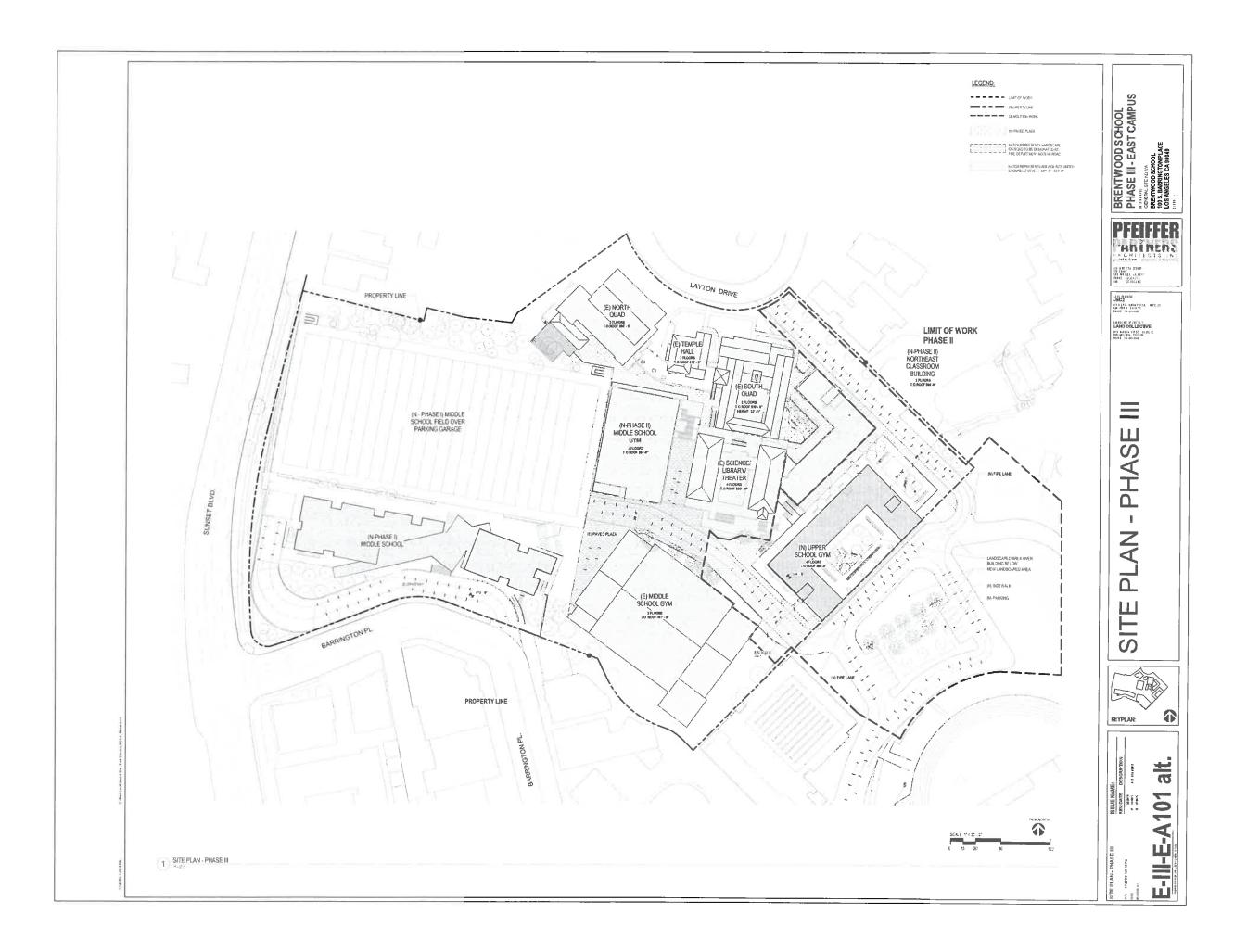


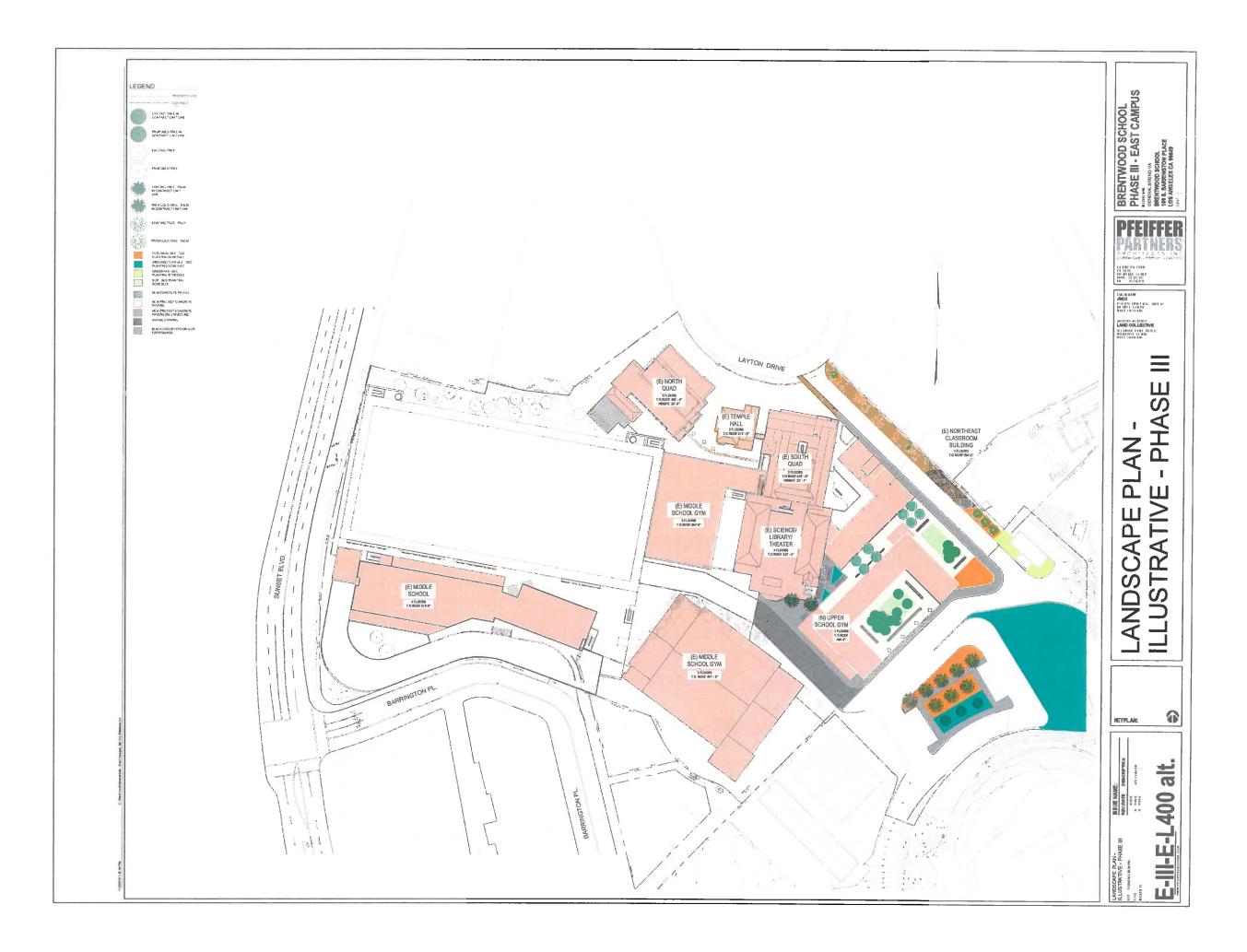




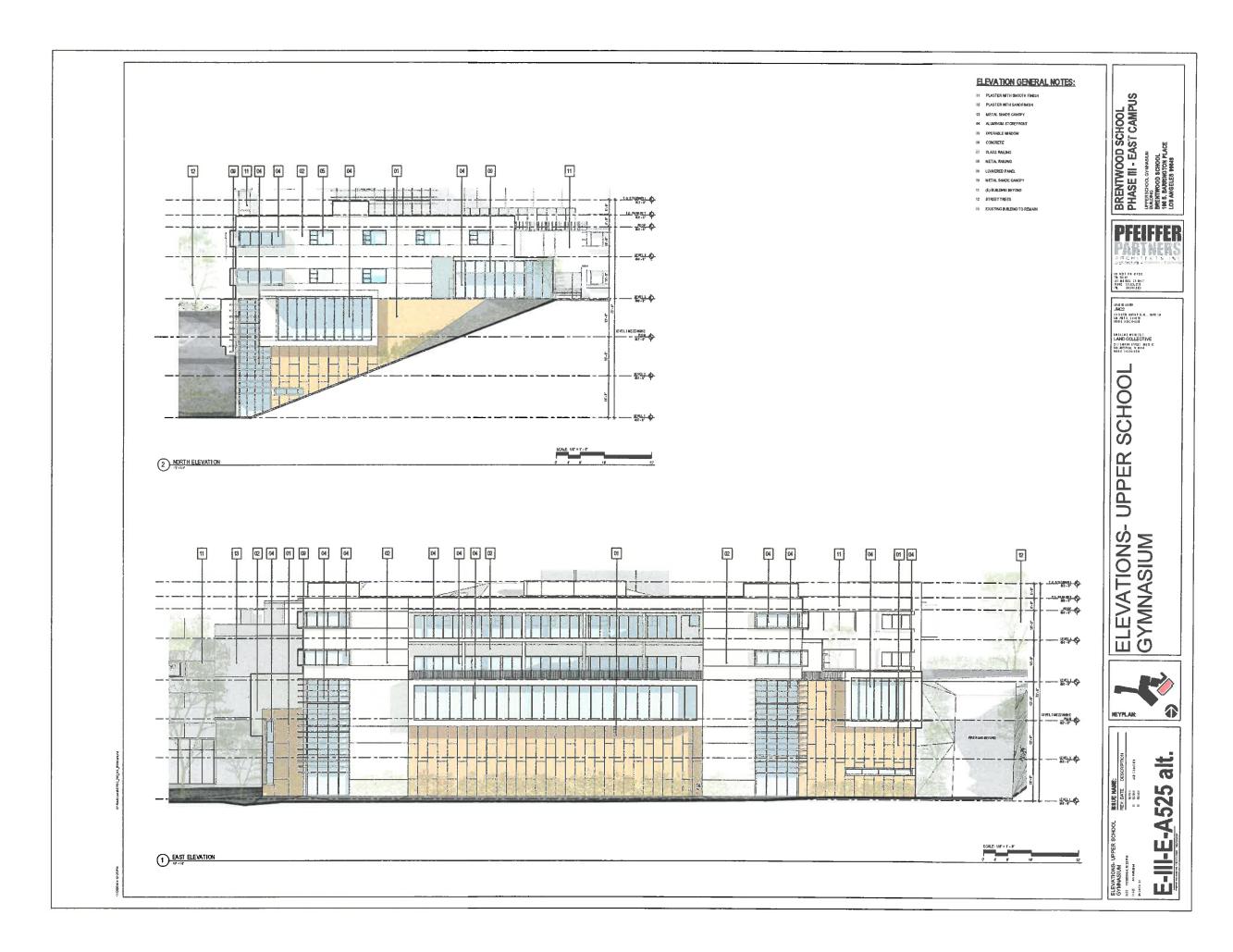


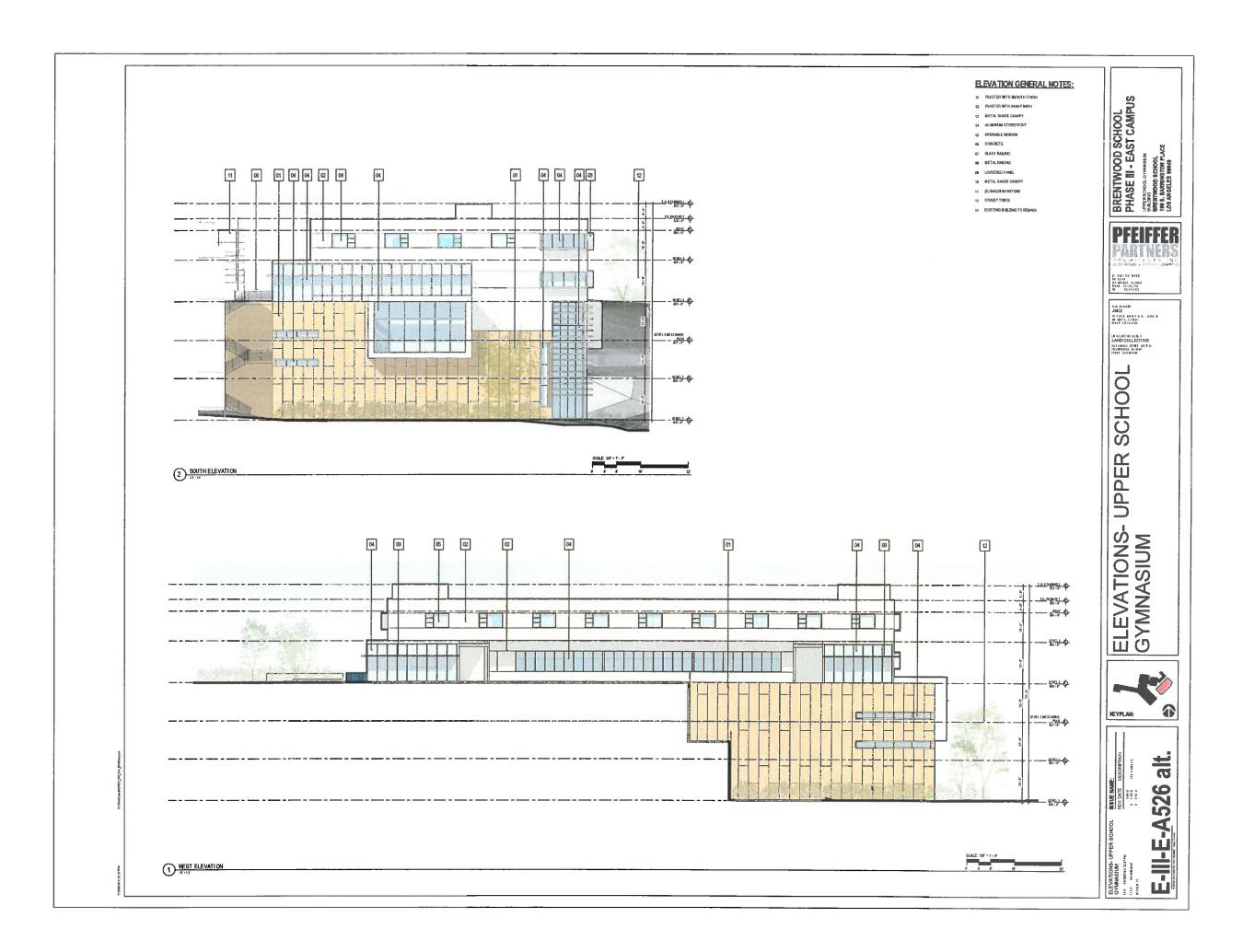


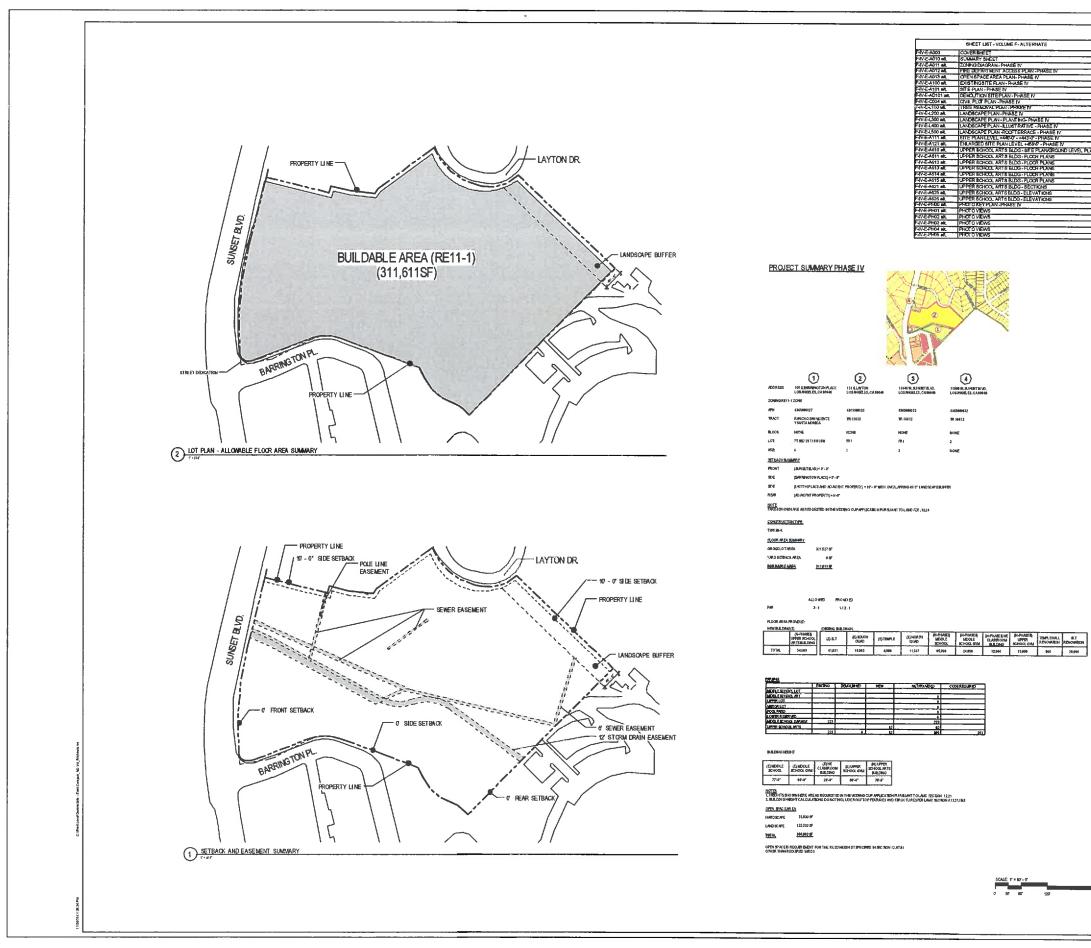




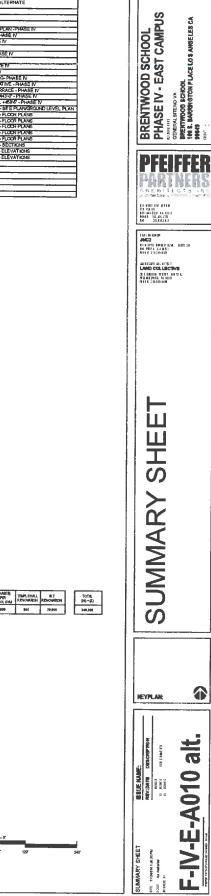


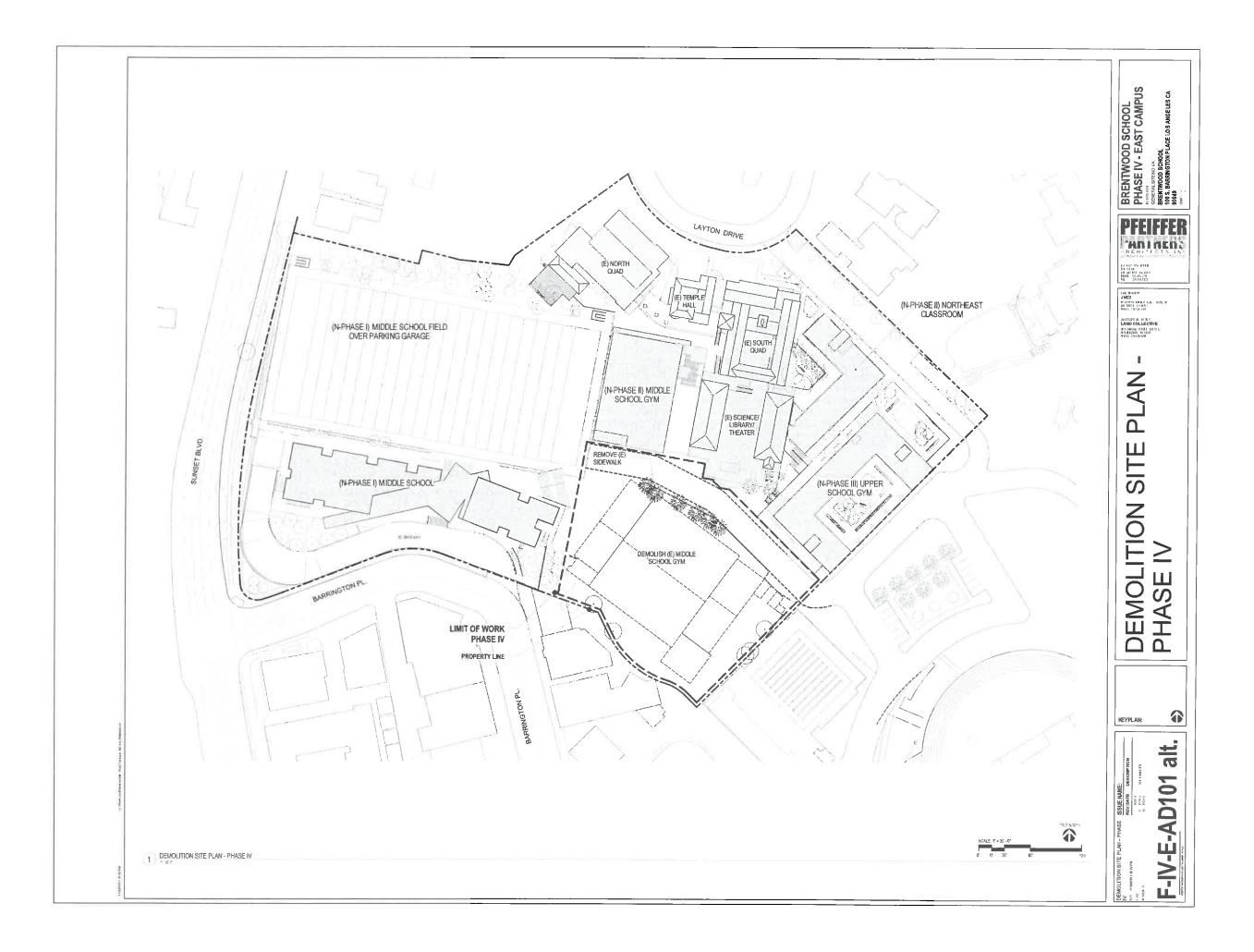


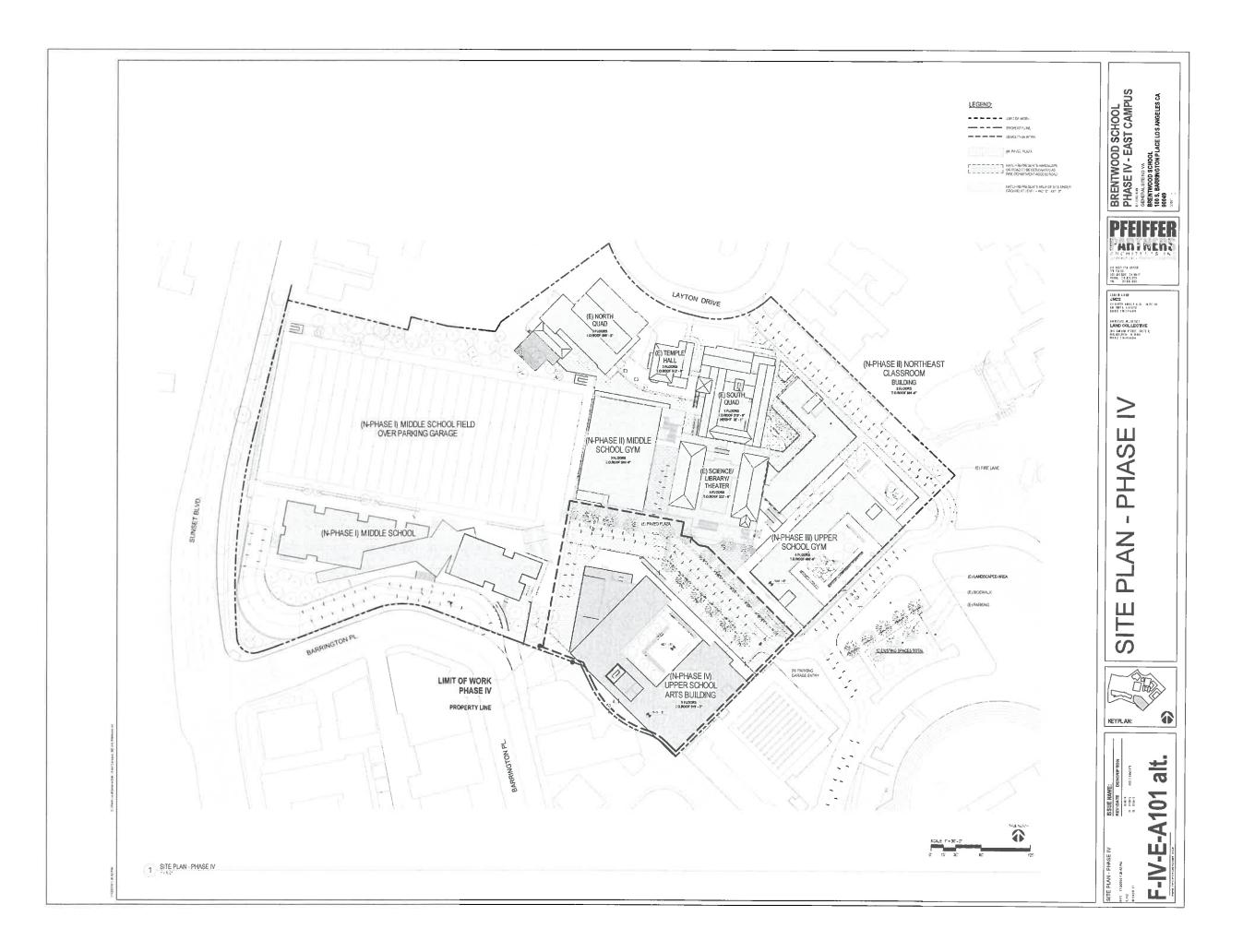


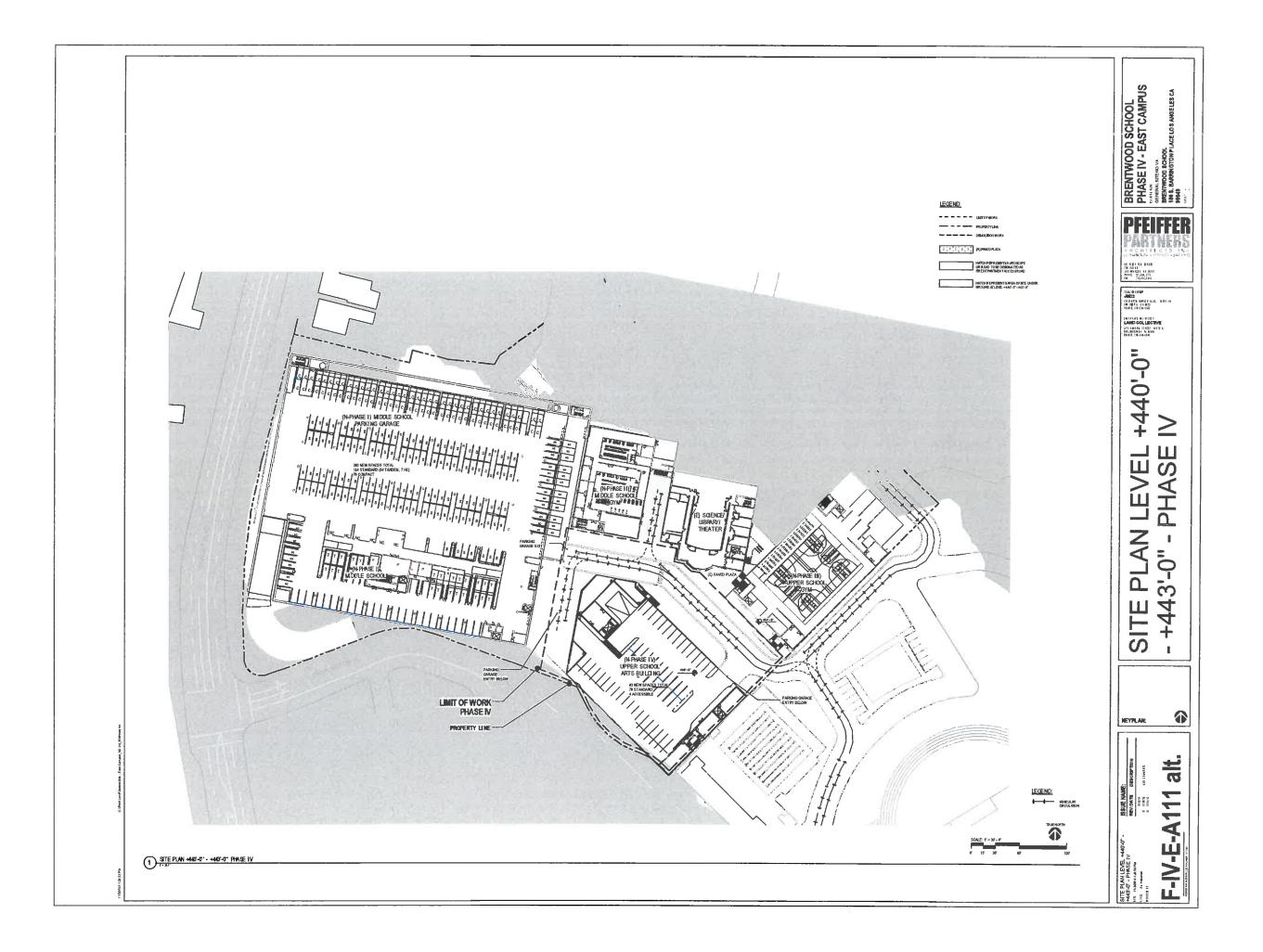


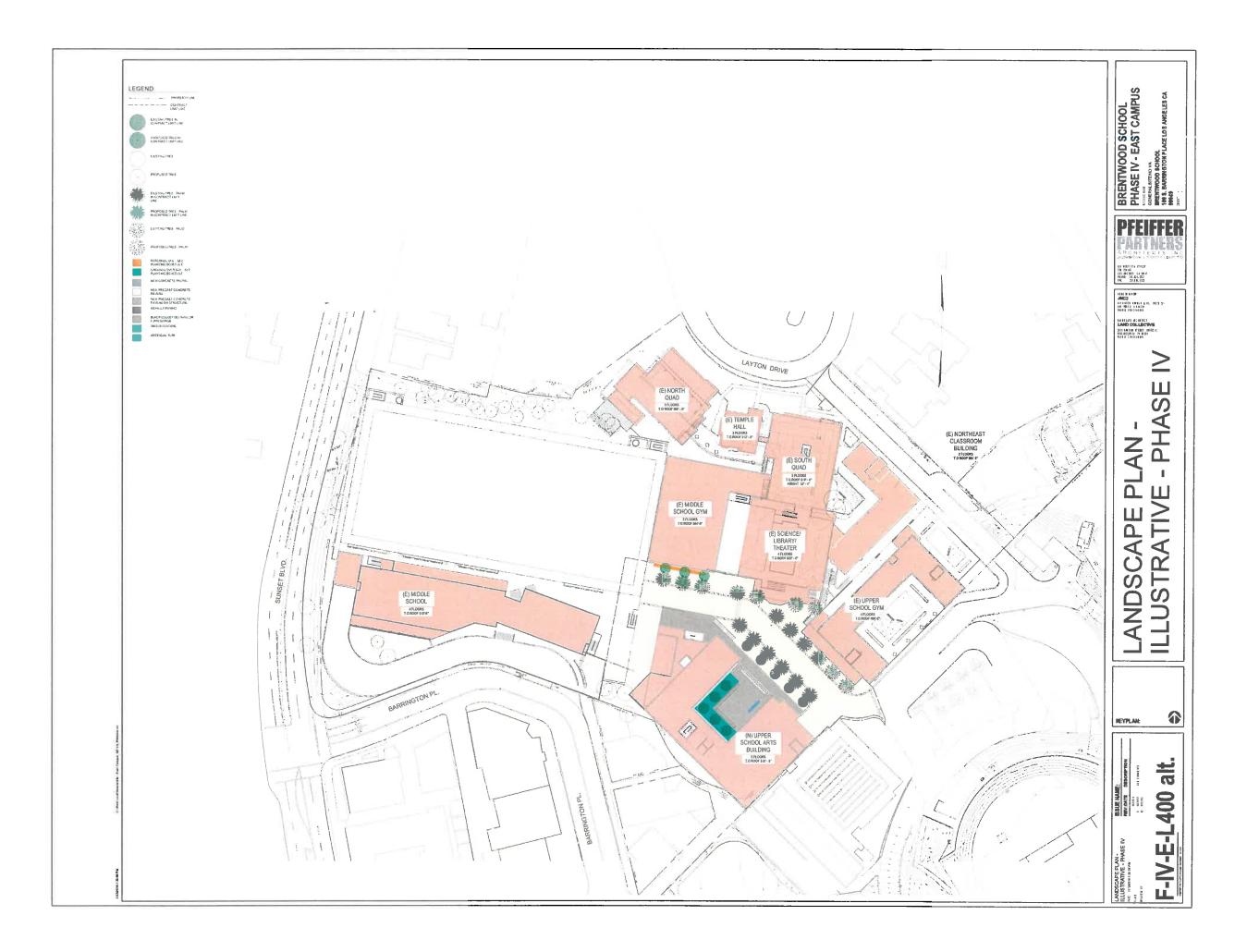
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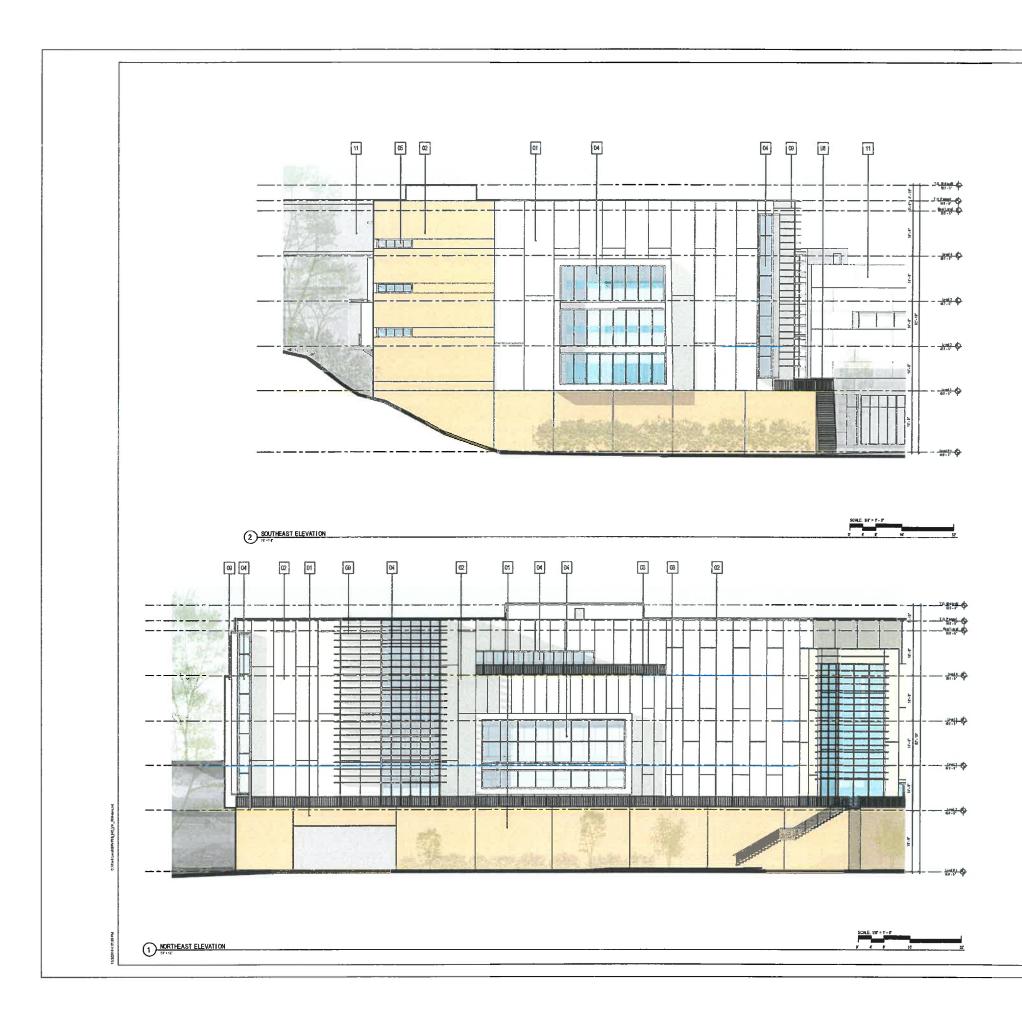








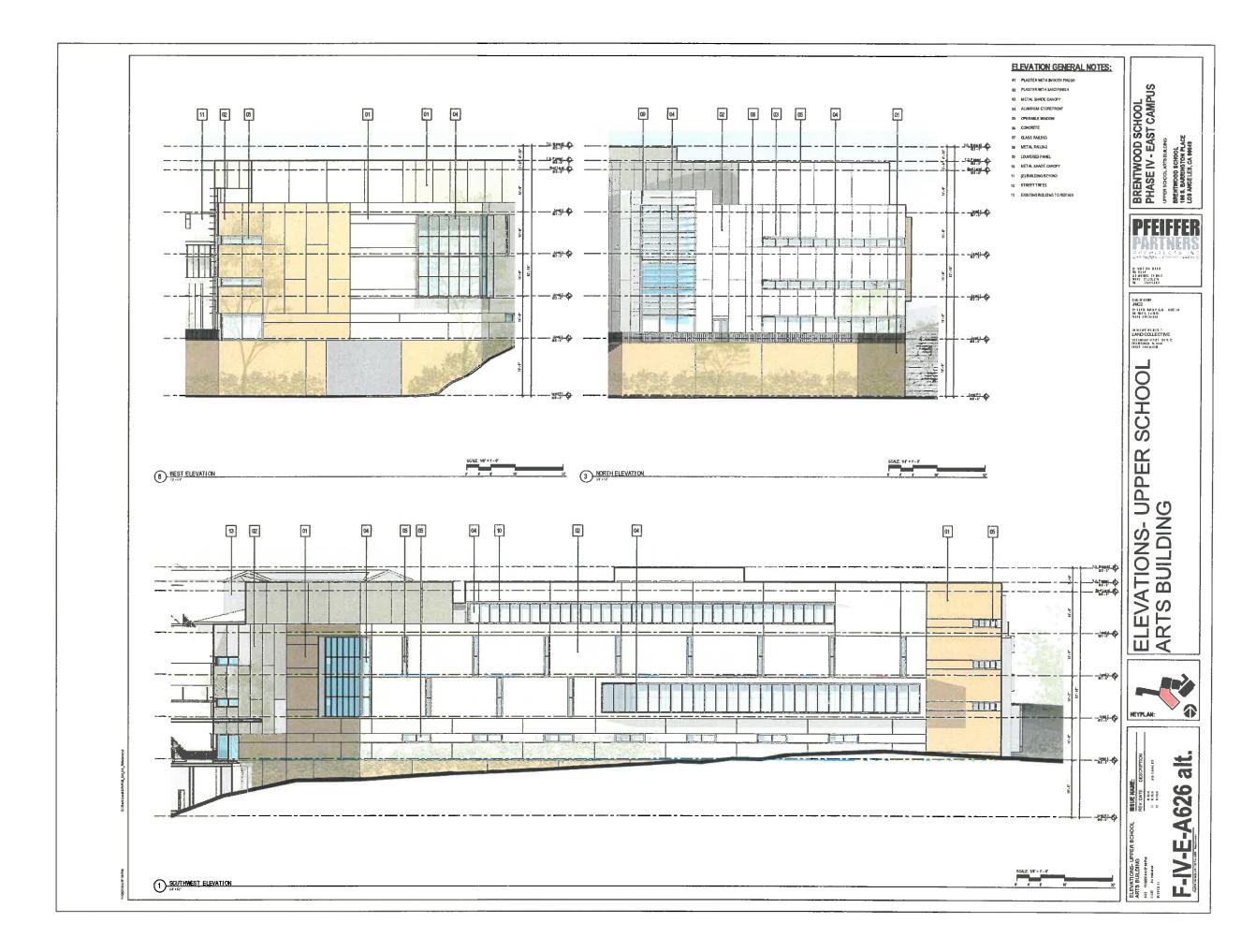


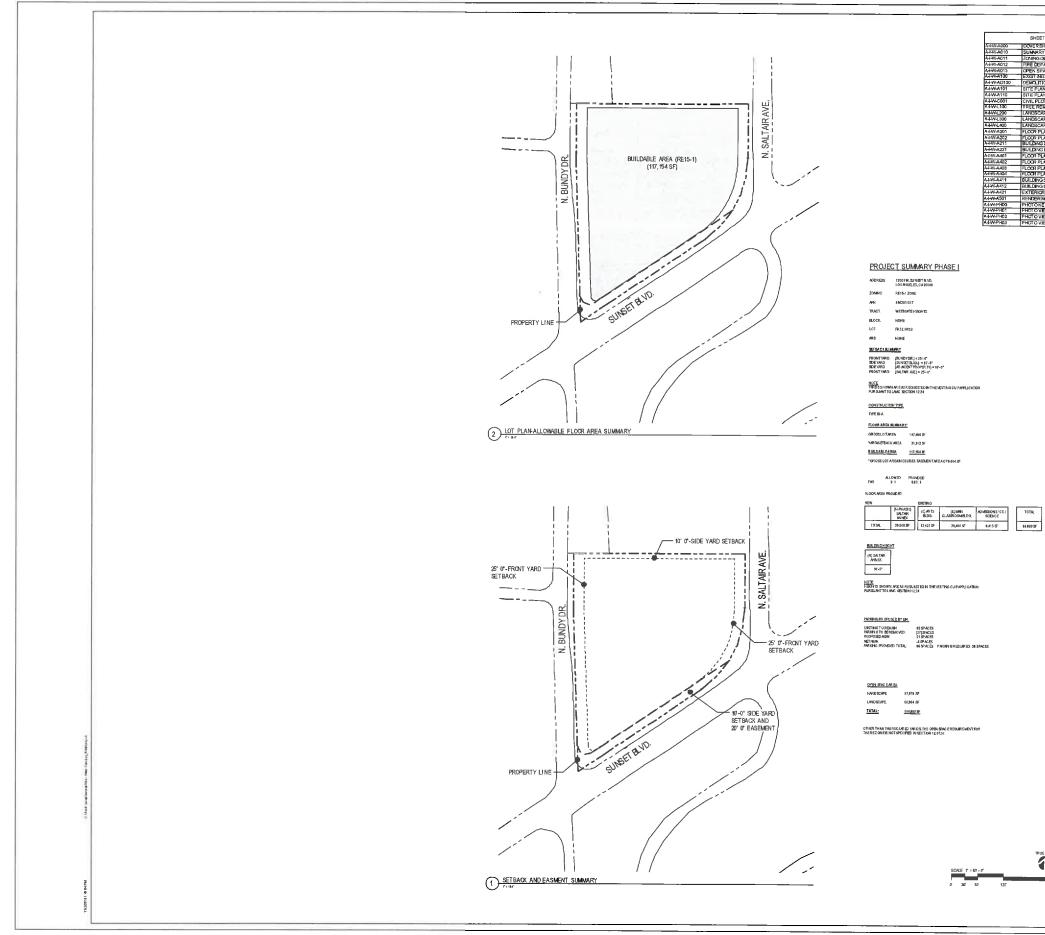




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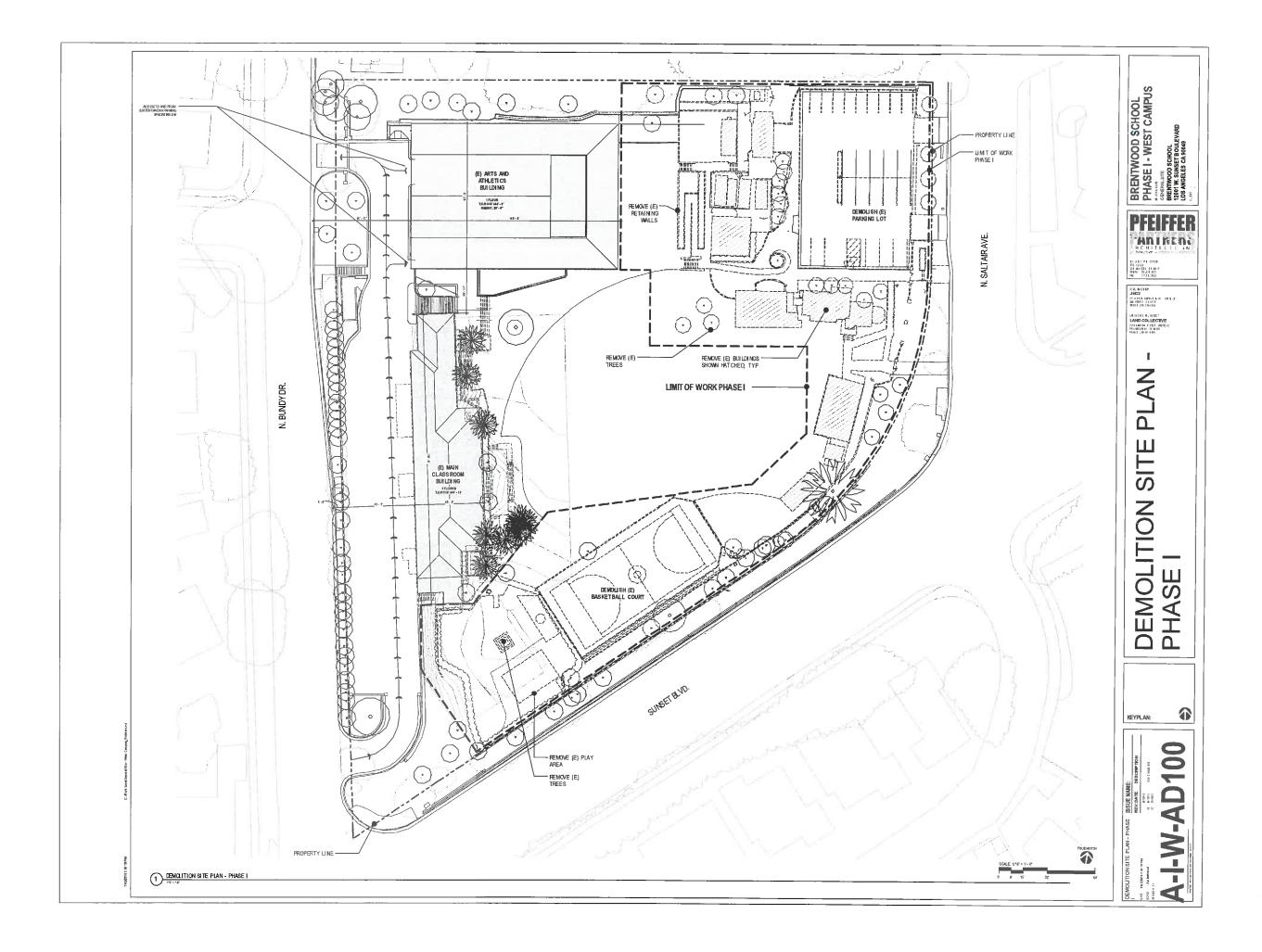


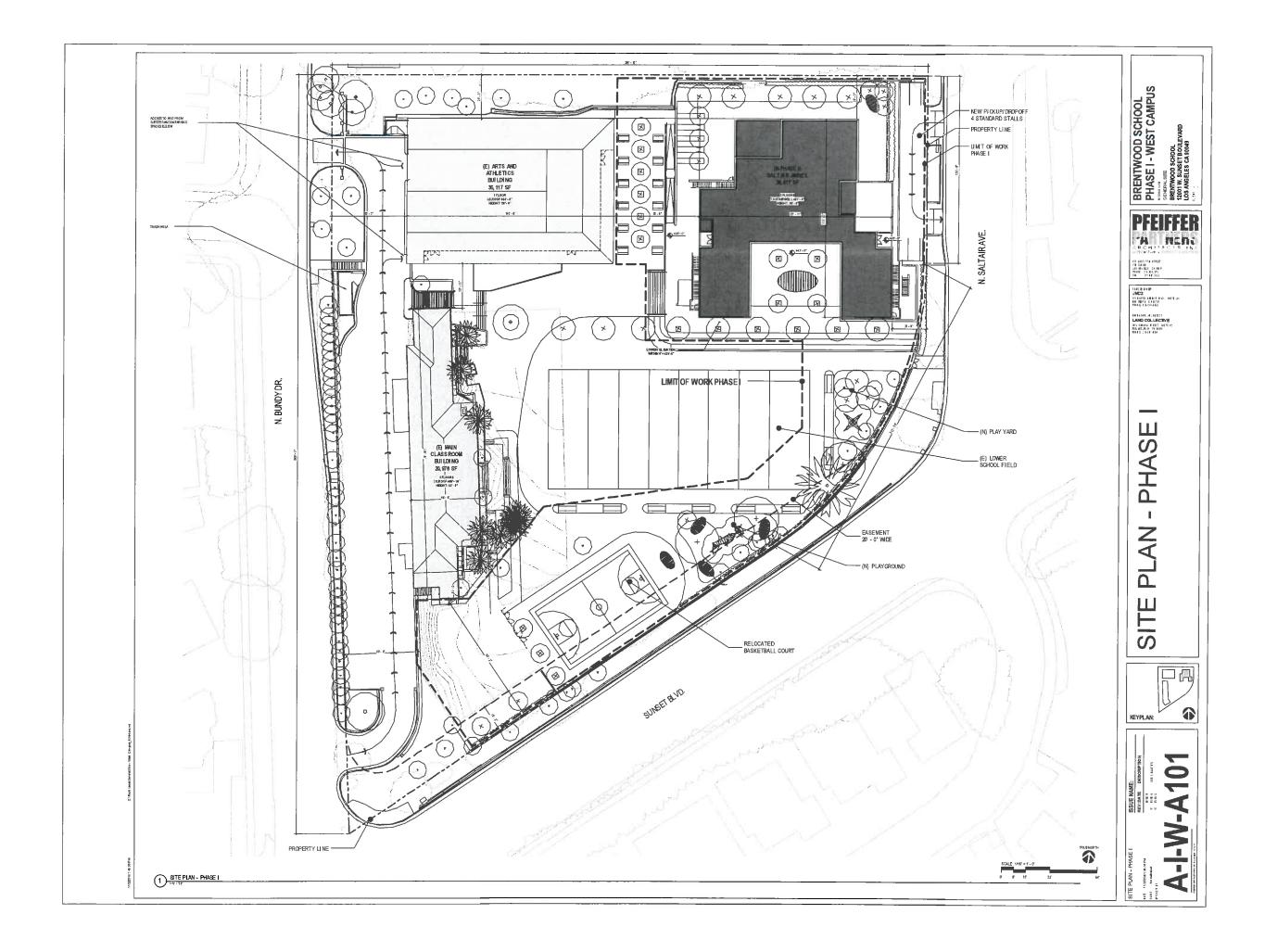


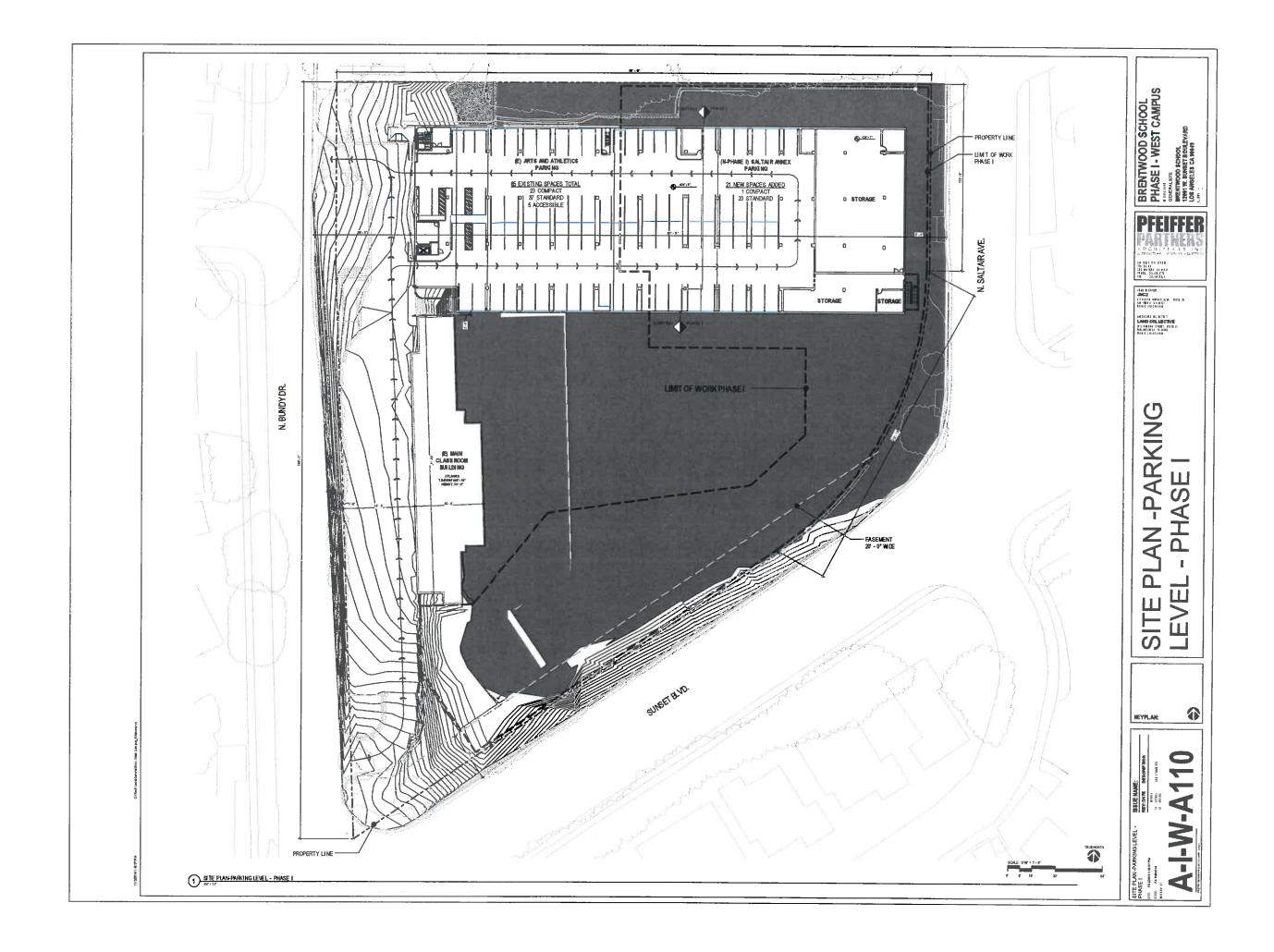
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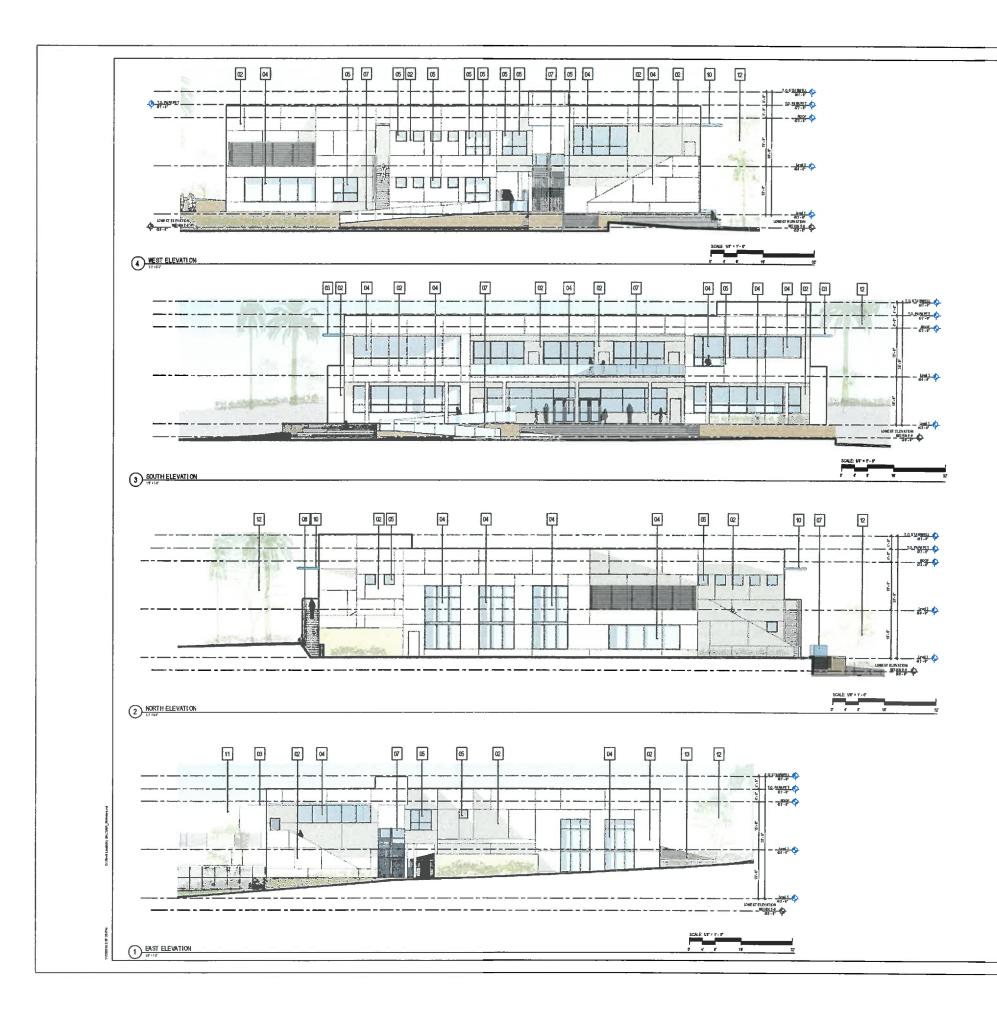


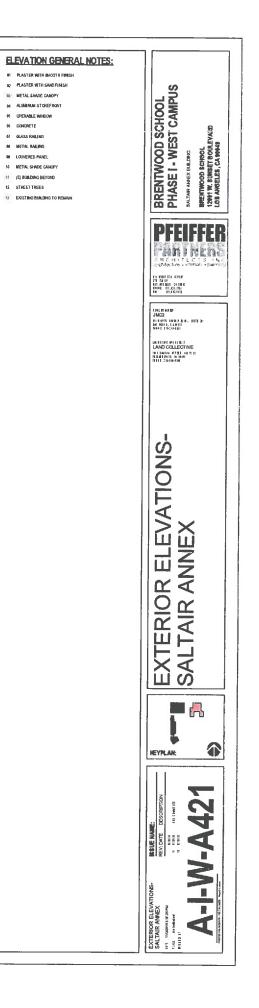






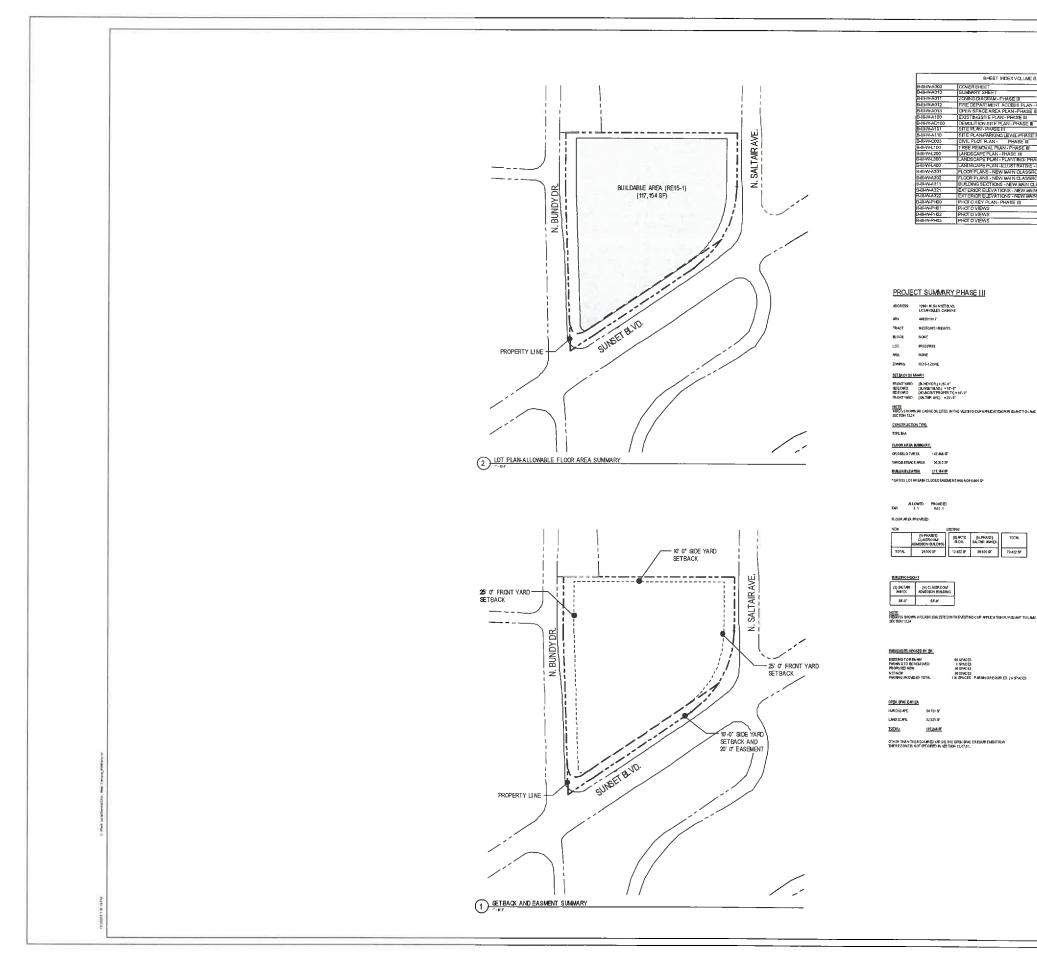






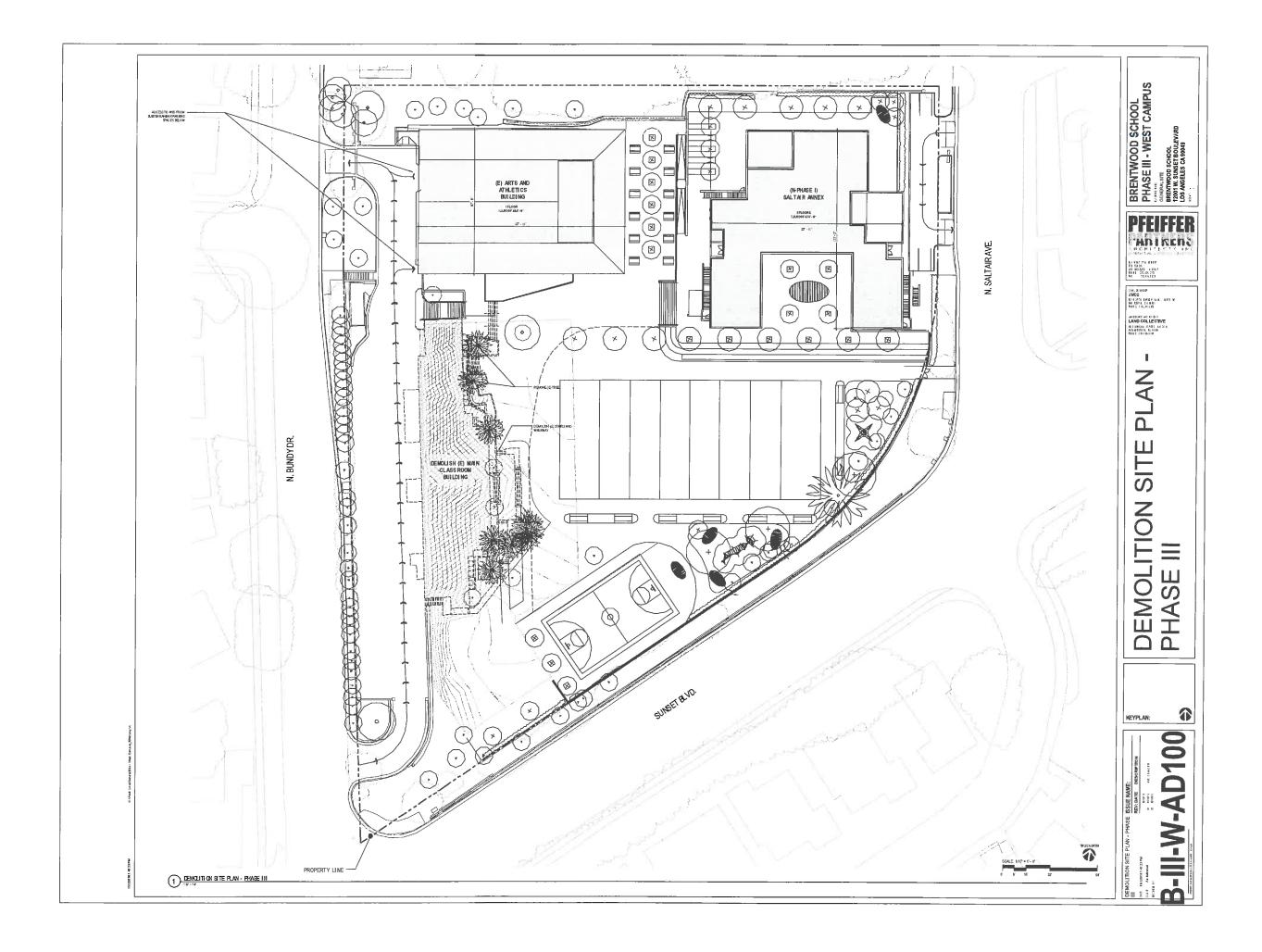


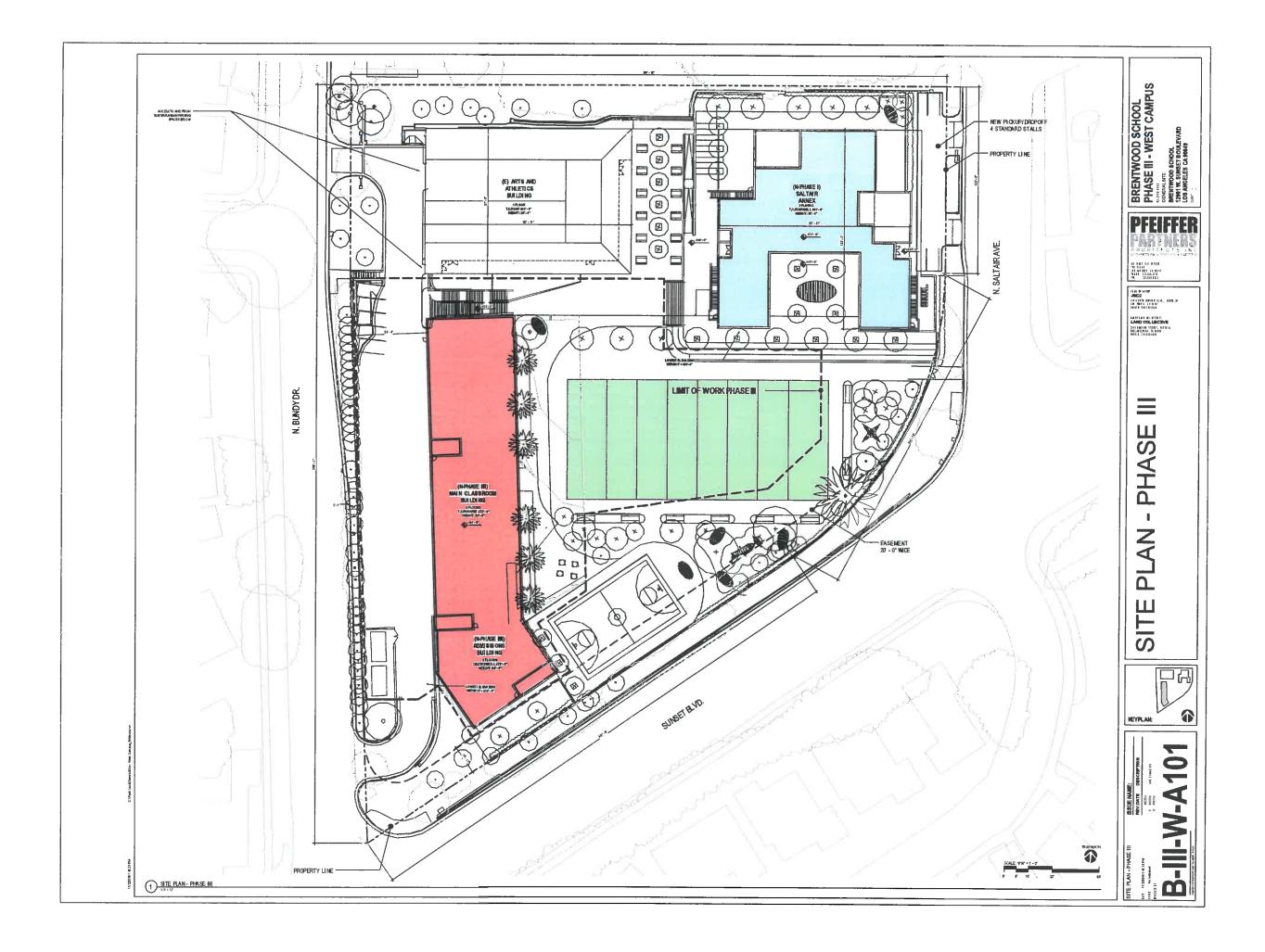


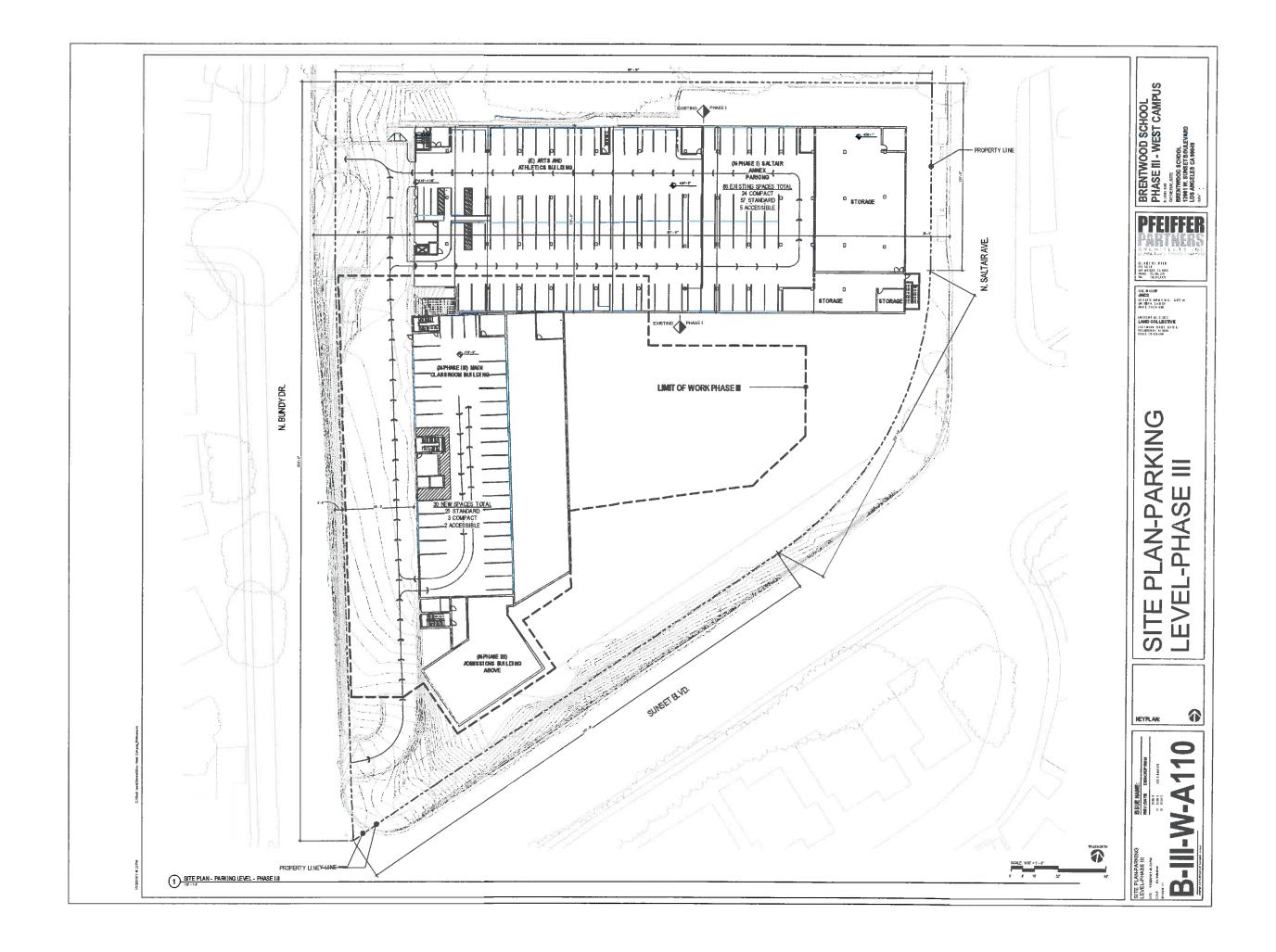


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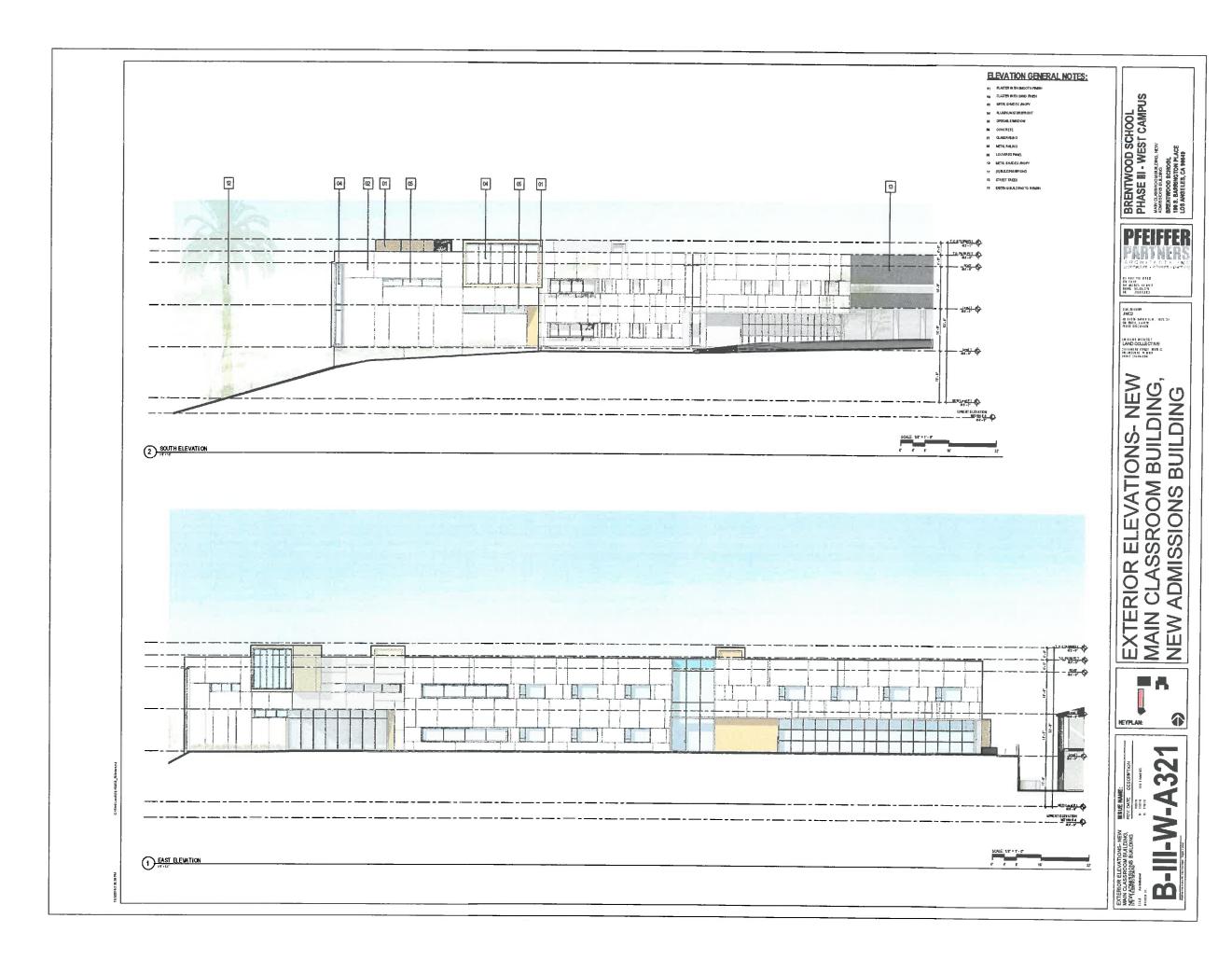


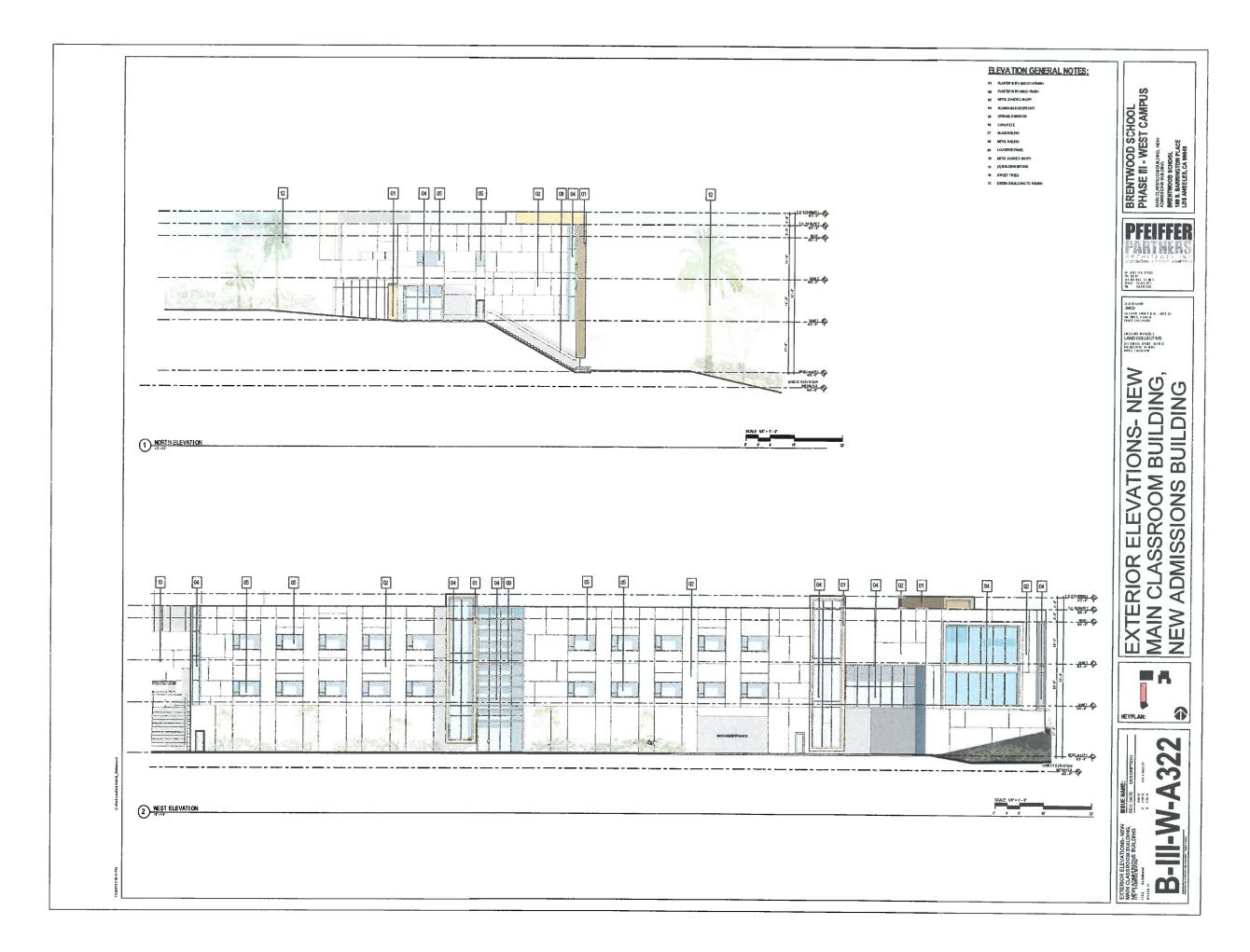






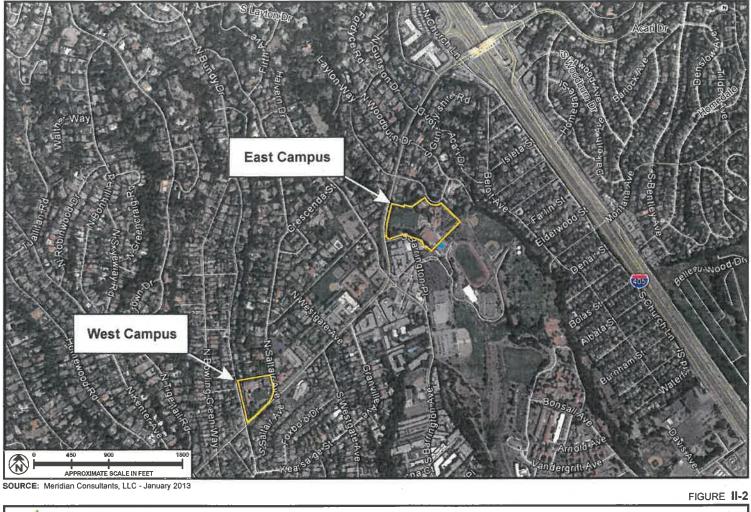






## EXHIBIT B

B1: Vicinity Map B2: Radius Map

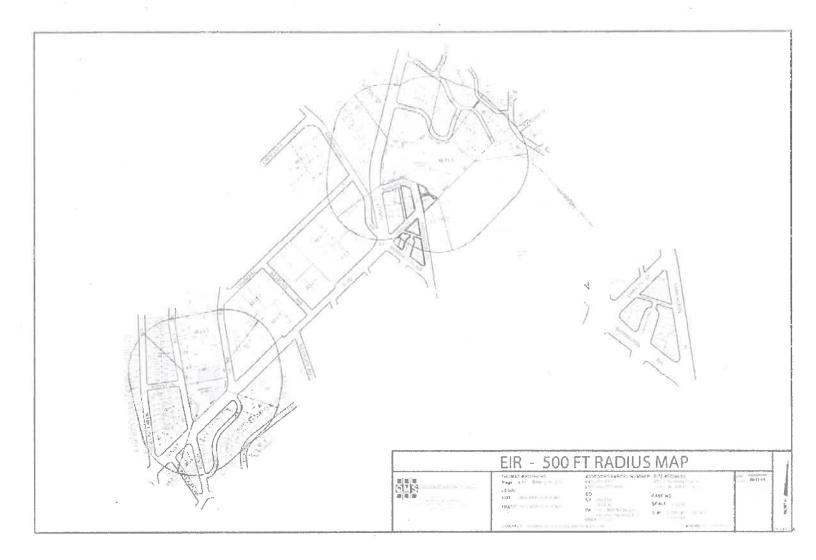




Vicinity Map

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## EXHIBIT C

## Environmental Impact Report ENV-2014-572-EIR

The Environmental Impact Report is available online at <u>http://planning.lacity.org/eir/brentwoodschool/BrentwoodSchoolCoverPg.html</u>

## EXHIBIT D

## Los Angeles Department of Transportation (LADOT) Traffic Assessment Letter

## CITY OF LOS ANGELES

## 12001 W. Sunset Boulevard DOT Case No. WLA 12-100818

Date: April 24, 2015

- To: Karen Hoo, City Planner Department of City Planning
- From: Eddie Guerrero, Transportation Engineer Department of Transportation

Subject: DOT TRAFFIC ASSESSMENT FOR THE PROPOSED BRENTWOOD SCHOOL EXPANSION -ADDENDUM

On March 25, 2015, the Department of Transportation (DOT) issued a traffic assessment report to the Department of City Planning on the proposed Brentwood School Expansion project. However, since providing this report it has been brought to DOT's attention that the project's driveway re-alignment proposal for South Barrington Place was not fully addressed in the DOT assessment and thus this addendum is being issued to provide this correction. Since all other points of discussion in the assessment report remain unchanged, this correction has been inserted into the original assessment so that the report can remain a single document. Therefore, please replace the previous DOT assessment with this report.

The Department of Transportation (DOT) has completed the traffic assessment of the Brentwood School East / West Campuses Expansion Project, located at 100 South Barrington Place and 12001 Sunset Boulevard respectively. The traffic assessment is based on a traffic study report prepared by Gibson Transportation Consulting dated January 2014. After a careful review of the pertinent data, DOT has determined that the traffic study adequately describes the project-related impacts of the proposed project.

## **PROJECT DESCRIPTION**

The Project proposes to implement a 30-year Master Plan to improve facilities on both the East and West campuses of the school and to increase the allowable enrollment limit from 695 students to 960. The student increase would be phased in over approximately four years beginning around year 2017, with full enrollment by year 2020, and includes the relocation of 6<sup>th</sup> grade from the West Campus to a new Middle School facility to be developed in the East Campus. Building construction activities are expected to continue after maximum student enrollment has been reached, but completion of these facilities will not result in permanent increased traffic to or from the Project site.

The Master Plan will be implemented in four phases with multi-year gaps between phases.

### **DISCUSSION AND FINDINGS**

Trip generation for the Project was estimated using the Institute of Transportation Engineers, Trip Generation, 9<sup>th</sup> Edition (2012). The project proposes to increase enrollment at the East Campus from 695 students to 960 students, representing an increase of 265 students. The attached table, **Attachment "A"**, list the trip generation results. The proposed enrollment increase is expected generate a net increase of 224 new trips during the A.M peak hour, 194 net new trips during the midday peak hour and, 45 net new trips during the P.M. peak hour. The West Campus does not propose to change the currently approved enrollment of 300 students and therefore, would not result in any new vehicular trip generation.

DOT has determined that the proposed Project could potentially create a significant traffic impact at the following five (5) intersections, as shown in the summary of volume-to-capacity (V/C) ratios and levels of service (LOS) for the study intersections (Attachment "B"):

- 1. Barrington Place & Sunset Boulevard
- 2. Church Lane & Sunset Boulevard
- 3. Barrington Avenue & Montana Avenue
- 4. San Vicente Boulevard / Federal Avenue & Wilshire Boulevard
- 5. Interstate 405 Northbound Ramps & Sunset Boulevard

To fully mitigate the identified traffic impacts to a less-than significant level, the project proposes to implement a zero-trips increase Transportation Demand Management (TDM) program.

### **PROJECT REQUIREMENTS**

In response to the findings of the traffic study, DOT recommends that the following Project requirements be adopted as conditions of project approval.

### A. Applicable Review Fee

In accordance with Los Angeles Municipal Code (LAMC) Section 19.15, the applicant is required to remit a Traffic Study Review Fee in the amount of \$8,996.00, prior to issuance of assessment. Applicant submitted payment of this fee on August 8, 2013.

## B. Traffic Management and Monitoring Program (TMMP)

In order to mitigate the projected traffic impacts to a less-than-significant level, the school shall implement a zero net trip increase traffic management and monitoring program (TMMP).

Verification of the school's traffic activity will be compiled via semi-annual (or bi-monthly, to be finalized prior to issuance of B-Permit) monitoring, to demonstrate that traffic demand at the East Campus does not exceed the baseline condition. The measurement of actual trips and monitoring shall cover the peak hours, Tuesday through Thursday (excluding school holidays), over a one-week period. The monitoring will be conducted via an independent review facilitated by LADOT at the school's expense. The school shall remit payment to LADOT immediately upon receiving an invoice for completing the monitoring service. LADOT will provide a copy of the monitoring report to the school, City Planning and, the Brentwood Homeowners Association.

The trip monitoring review period shall be for a minimum of five (5) years, in which time the review must show accomplishment of the zero net increase target for the entire five-year period. Should the review show that the zero net trip increase was not achieved the school will have until the next monitoring review to correct its deficiency. If the school cannot achieve the zero – net increase target on the subsequent monitoring review, the school shall be subject to a monitory penalty equivalent to the current West L.A. TIMP Traffic Impact Assessment (TIA) Fee, for each trip in excess of the cap and a new five (5) year review period will commence with the following monitoring report. Upon a second consecutive non-compliance occurrence, the school shall be subject to an enrollment reduction in an amount commensurate with achieving the zero net trip increase target and a new five year review period will commence with the following monitoring review. All non-compliance payments received will be held separate for transportation improvements in the community.

A full Traffic Management Plan (TMP), detailing the actions the school will be implementing to achieve the zero net trip increase and overall school traffic minimization, should be submitted to DOT and the Department of City Planning for review and approval, prior to the issuance of any certificate of occupancy.

## C. Physical Street Improvement

### South Barrington Place

The Project proposes to relocate the primary school access via the construction of a new driveway on South Barrington Place farther away from Sunset Boulevard and restripe the roadway, while keeping the existing driveway as a gated access for emergency vehicles. This proposed new driveway requires the removal of two metered parking spaces and possible placement of peak-hour (3-6:00 p.m.) parking restrictions for approximately seven (7) parking spaces on the north side of Barrington Place and the removal of two metered parking spaces on the south side of Barrington Place opposite the proposed new driveway.

This requirement must be guaranteed prior to issuance of any building permit through the Bpermit process of the Bureau of Engineering, Department of Public Works. This improvement must be constructed and completed prior to issuance of any certificate of occupancy to the satisfaction of DOT and the Bureau of Engineering. Prior to setting the bond amount, BOE shall require that the developer's engineer or contractor contact DOT's B-Permit Coordination Engineer at (213) 972-8685, to arrange a pre-design meeting to finalize the plans needed for this improvement.

### D. Site Access and Internal Circulation

This determination does not include approval of the project's driveways, internal circulation and parking scheme. The applicant is advised to consult with DOT for driveway locations and specifications prior to the commencement of any architectural plans, as they may affect building design. Final DOT approval shall be obtained prior to issuance of any building permits. This should be accomplished by submitting detailed site / driveway plans, at a scale of at least 1" = 40', separately to DOT's West L.A. / Coastal Development Review Section at 7166 West Manchester Avenue, as soon as possible but prior to submittal of building plans for plan check to the Department of Building and Safety.

## E. Pedestrian Connectivity

The applicant shall consult with the Department of City Planning for any additional requirements pertaining to pedestrian walkability and connectivity, as described in the Walkability Checklist.

## F. Construction Impacts

DOT recommends that a construction work site traffic control plan be submitted to DOT's Western District Office for review and approval prior to the start of any construction work. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that construction related traffic be restricted to off-peak commuting hours, as well as school off-peak hours when school is in session.

## G. Development Review Fees

An ordinance adding Section 19.15 to the Los Angeles Municipal Code relative to application fees paid to DOT for permit issuance activities was adopted by the Los Angeles City Council in 2009. This ordinance identifies specific fee for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

If you have any questions, please contact Clive Grawe, of the DOT West L.A. Planning Office, at (213) 485-1062.

EG:CG

### Attachments

 cc: Debbie Dyner Harris, Norman Kulla, Tricia Keane, Eleventh Council District Jay Kim, DOT Planning Mo Blorfroshan, DOT - Western District David Weintraub, DCP Mike Patonai, Anthony Munoz, BOE Brian Hartshorn, Gibson Transportation Consulting

## 12001 W. Sunset Blvd., DOT Case No. WLA12-100818

## ATTACHMENT A

## TABLE 6 PROJECT TRIP GENERATION

Land Use	Peak Period	Trip Rate		In			Out				
Private School	A.M.	T=0.77(x)+19.92				61%		39%			
(ITE Land Use 536) [a]	MID	T=0.43(x)+79.59 T=0.17(x)		42% 43%			48% 57%				
T=trips; x=number of students	P.M.										
Description	Propo		Campus I .M. Peak H	ncreased E Iour		id Peak Ho	our	P	.M. Peak H	our	
Description	Size	In	Out	Total	In	Out	Total	In	Out	Total	
Increased Student Enrollment	265 students	137	87	224	81	113	194	19	26	45	

NOTE: The West Campus does not propose change to enrollment, therefore no trip generation is included for West Campus

[a] Trip generation rate for private school from Trip Generation, 9th Edition (Institute of Transportation Engineers, 2012).

## TABLE 7 **EXISTING WITH PROJECT CONDITIONS (YEAR 2014)** SIGNALIZED INTERSECTION PEAK HOUR LEVELS OF SERVICE

No	Intersection	Peak	Existing	Conditions		with Project ditions	Change in V/C	Impact
		Hour	V/C	LOS	V/C	LOS		
1'.	Kenter Avenue &	A.M.	0.681	В	0.683	В	0.001	NO
	Sunset Boulevard	MID	0.699	В	0.699	В	0.001	NO
		P.M.	0.505	A	0.505	A	0.000	NO
2.	Bundy Drive &	A.M.	0.529	. A	0.529	A	0.000	NO
	Sunset Boulevard	MID	1.077	F	1.077	F	0.000	NO
	[a] [b]	P.M.	1.248	F	1.248	F	0.000	NO
3.	Saltair Avenue &	A.M.	0.615	В	0.615	В	0.000	NO
	Sunset Boulevard	MID	0.979	E	0.979	E	0.000	NO
	[a] [b]	P.M.	1.133	F	1.133	F	0.000	NO
4.	Barrington Avenue &	A.M.	0.877	D	0.877	D	0.000	NO
	Sunset Boulevard	MID	1.328	F	1.332	F	0.004	NO
	[a] [b]	P.M.	1.351	F	1.353	F	0.002	NO
5.	Barrington Place &	A.M.	0.735	С	0.735	C	0.000	NO
	Sunset Boulevard	MID	0.873	D	0.908	E	0.035	YES
	[a] [b]	P.M.	0.904	E	0.904	E	0.000	NO
6.	Church Lane &	A.M.	0.835	D	0.861	D	0.027	YES
	Sunset Boulevard	MID	0.741	c	0.754	C	0.013	NO
		P.M.	0.840	D	0.842	D	0.002	NO
7.	Church Lane &	A.M.	0.611	B	0.619	B	0.007	NO
[	Interstate 405 Southbound On/Off-Ramp	MID	0.699	В	0.702	c	0.003	NO
		P.M.	0.789	C	0.790	c	0.000	NO
8.	Interstate 405 Northbound On/Off-Ramp	A.M.	0.664	B	0.684	В	0.020	NO
	Sunset Boulevard	MID	0.441	Ā	0.450 ·	A	0.020	NO
		P.M.	0.473	A	0.475	A	0.003	NO
9.	Veteran Avenue &	A.M.	0.660	B	0.675	B	0.002	NO
	Sunset Boulevard	MID	0.774	c	0.788	c	0.015	NO
		P.M.	0.986	E	0.991	E	0.013	NO
10.	Bundy Drive (West) &	A.M.	0.506	A	0.510	A	0.004	NO
	San Vicente Boulevard	MID	0.590	A	0.595	Â	0.004	NO
		P.M.	0.619	В	0.621	В	0.003	NO
11.	Bundy Drive (East)	A.M.	0.461	A	0.467	A	0.006	NO
	San Vicente Boulevard	MID	0.556	A	0.559	Â	0.003	NO
		P.M.	0.480	Â	0.333		0.003	NO
12.	Barrington Avenue &	A.M.	0.610	B	0.635	B		······································
	San Vicente Boulevard	MID	0.645	В	0.664	B	0.025	NO
		P.M.	0.392	A	0.864		0.019 0.005	NO NO
13.	Barrington Avenue &	A.M.	0.392	A	0.397	A		
	Montana Avenue	MID	0.727	c	0.507	A	0.044	NO
	[b]	P.M.	1.039	F		C F	0.029 0.013	NO
14.	San Vicente Boulevard/Federal Avenue &	A.M.	0.677	B	1.051 0.678			YES
	Wilshire Boulevard	MID	1.053	F	1.066	В	0.001	NO
			1.000	г	1.000	F .	0.012	YES

<u>Notes</u>

[a] Override capacity to simulate actual operations for midday traffic
 [b] Override capacity to simulate actual operations for PM traffic
 Number rounding may occur in spreadsheet background

## TABLE 8 FUTURE WITH PROJECT CONDITIONS (YEAR 2020) SIGNALIZED INTERSECTION PEAK HOUR LEVELS OF SERVICE

No	Intersection	Peak Hour	9	without Conditions	n	re with Conditions	Change in V/C	Impact
			V/C	LOS	V/C	LOS		
1.	Kenter Avenue &	A.M.	0.744	C	0.746	С	0.001	NO
	Sunsef Boulevard	MID	0.780	С	0.781	c	0.001	NO
		P.M.	0.574	A	0.574	A	0.000	NO
2.	Bundy Drive &	A.M.	0.581	A	0.581	A	0.000	NO
	Sunset Boulevard	MID	1.166	F	1.166	F	0.000	NO
L	[a] [b]	P.M.	1.349	F	1.349	F	0.000	NO
3.	Saltair Avenue &	A.M.	0.665	В	0.665	В	0.000	NO
	Sunset Boulevard	MID	1.058	F	1.058	F	0.000	NO
	[a] [b]	P.M.	1.220	F	1.220	F	0.000	NO
4.	Barrington Avenue &	A.M.	1.723	F	1.723	F	0.000	NO
	Sunset Boulevard	MID	1.447	F	1.451	F	0.004	NO
	[a] [b]	P.M.	1.478	F	1.479	F	0.002	NO
5.	Barrington Place &	A.M.	0.812	D	0.812	D	0.000	NO
	Sunset Boulevard	MID	0.953	E	0.953	E	0.000	NO
	[a] [b]	P.M.	0.994	E	0.994	Е	0.000	NO
6.	Church Lane &	A.M.	0.896	D,	0.923	E	0.026	YES
	Sunset Boulevard	MID	0.799	C	0.812	D	0.013	NO
		P.M.	0.916	E	0.919	E	0.003	NO
7.	Church Lane &	A.M.	0.650	В	0.657	В	0.007	NO
	Interstate 405 Southbound On/Off-Ramp	MID	0.764	С	0.767	Ċ	0.003	NO
		P.M.	0.857	D	0.858	D	0.001	NO
8.	Interstate 405 Northbound On/Off-Ramp	A.M.	0.839	D	0.860	D	0.021	YES
	Sunset Boulevard	MID	0.530	A	0.545	А	0.015	NO
		P.M.	0.552	А	0.555	А	0.003	NO
9.	Veteran Avenue &	A.M.	0.714	С	0.728	С	0.014	NO
	Sunset Boulevard	MID	0.784	С	0.799	С	0.015	NO
		P.M.	1.021	F	1.024	F	0.004	NO
10.	Bundy Drive (West) &	A.M.	0.569	А	0.573	A	0.004	NO
	San Vicente Boulevard	MID	0.673	В	0.678	в	0.005	NO
		P.M.	0.709	С	0.710	С	0.001	NO
11.	Bundy Drive (East)	A.M.	0.524	A	0.529	A	0.006	NO
	San Vicente Boulevard	MID	0.689	В	0.692	В	0.003	NO
		P.M.	0.612	В	0.612	в	0.001	NO
12.	Barrington Avenue &	A.M.	0.649	В	0.674	В	0.025	NO
	San Vicente Boulevard	MID	0.706	С	0.725	С	0.019	NO
		P.M.	0.453	А	0.457	А	0.004	NO
13.	Barrington Avenue &	A.M.	0.442	A	0.485	A	0.044	NO
	Montana Avenue	MID	0.759	С	0.788	С	0.029	NO
	[b]	P.M.	1.113	F	1.125	F.	0.013	YES
14.	San Vicente Boulevard/Federal Avenue &	A.M.	0.741	С	0.743	С	0.001	NO
	Wilshire Boulevard	MID	1.158	F	1.161	F	0.003	NO ·
	[a] [b]	. P.M.	1.308	F	1.308	F	0.000	NO

<u>Notes</u>

 [a]
 Override capacity to simulate actual operations for midday traffic

 [b]
 Override capacity to simulate actual operations for PM traffic

 Number rounding may occur in spreadsheet background