EXECUTIVE SUMMARY

This Draft Environmental Impact Report (DEIR) has been prepared to evaluate the potential environmental impacts that could result from a proposed three-level, 750-space, Parking Structure with a rooftop (lighted) athletic field (Parking Structure) and pedestrian bridge across Coldwater Canyon Avenue, located on the approximately 24.5 acre Project Site that is comprised of the approximately 5.5-acre Development Site and the approximately 19-acre Upper School Campus of the Harvard-Westlake School (Harvard-Westlake Campus or Campus). The Parking Structure would be located on an approximately 5.5-acre Development Site across Coldwater Canyon Avenue from the approximately 19-acre Harvard-Westlake School. The Parking Structure would be an accessory use to the Harvard-Westlake Campus that would alleviate current impacts that occur as a result of school-related parking (buses and cars) along Coldwater Canyon Avenue and in the surrounding residential neighborhood. The Project also includes improvements to Coldwater Canyon Avenue adjacent to the Project Site that would improve traffic flow and pedestrian safety along that stretch of Coldwater Canyon Avenue.

In accordance with California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15123, this DEIR contains a summary of the Proposed Project (referred to in this document as the Project, Proposed Project and Proposed Parking Structure), and its anticipated consequences. More detailed information regarding the Proposed Project and its potential environmental effects are provided in the following sections of this EIR, particularly throughout Chapter 3, Environmental Setting, and Mitigation Measures.

LEAD AGENCY

The City of Los Angeles Planning Department is the Lead Agency for preparation of this EIR.

PROJECT LOCATION

The Harvard-Westlake Campus (Project Site) is located on the east and west sides of Coldwater Canyon Avenue, approximately 0.3 miles south of Ventura Boulevard and 1.3 miles north of Mulholland Drive, in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City of Los Angeles. The Harvard-Westlake Campus is approximately 24.5 acres, comprised of two areas: 1) the approximately 19-acre (831,268.4 square feet) Campus, located at 3700 N. Coldwater Canyon Avenue, and generally bounded by Halkirk Street to the north, Coldwater Canyon Avenue to the west, and Hacienda Drive to the south; and 2) the approximately 5.5-acre (238,740 square feet) Development Site, comprised of an irregularly shaped portion of the Campus located on the west side of Coldwater Canyon Avenue (3701, 3703, 3705, 3707, 3717, 3719 & 3801 N. Coldwater Canyon Avenue), directly across from the Harvard-Westlake Campus.

PROJECT CHARACTERISTICS

The Proposed Project consists of the development of a three-story Parking Structure with 750 parking spaces and a rooftop (lighted) athletic field. The building would be 45-feet to the field level, or 755 feet above mean sea level (AMSL), and 57 feet (767 feet AMSL) to the top of the facilities building proposed to be located at the north end of the field. The Parking Structure would also feature a 32-foot high catchment fence around the field on top of the structure, which would achieve a height of approximately 77 feet (787 feet AMSL). There would be approximately 10 light poles (each with two to three fixtures) that would reach a height of approximately seven feet above the catchment fence, or 39 feet above the field, for a total overall height up to approximately 84 feet (794 feet AMSL).

The proposed Parking Structure would be used for parking purposes only, with no student drop-off and pick-up operations permitted on the Development Site. All student drop-offs and pick-ups would occur on the Harvard-Westlake Campus, in a slightly modified configuration to allow for a safer and more efficient operation for motorists and pedestrians.

The Project would include off-site roadway improvements to Coldwater Canyon Avenue that would facilitate traffic movement through the Project area. These improvements include:

- Provide one northbound through lane and two southbound through lanes on Coldwater Canyon Avenue along the Project frontage (i.e., addition of one southbound through lane);

- At the intersection of Coldwater Canyon Avenue and the Proposed Project's northerly driveway opposite the relocated Harvard-Westlake driveway, provide:

    - Northbound: One left-turn lane, one through lane and one right-turn lane;
    - Southbound: One left-turn lane, two through lanes and one right-turn lane;
    - Eastbound: One left-turn lane and one optional through/right-turn lane; and
    - Westbound: One left-turn lane and one optional through/right-turn lane;

- Also at the intersection of Coldwater Canyon Avenue and the Proposed Project's northerly driveway opposite the relocated Harvard-Westlake driveway, provide new traffic signal equipment, including left-turn phasing for northbound and southbound Coldwater Canyon Avenue traffic, and LADOT's ATSAC/ATCS equipment with connection to the Coldwater Canyon Avenue intersection at Ventura Boulevard;

- At the intersection of Coldwater Canyon Avenue and the Proposed Project's southerly driveway, provide:

    - Northbound: One through lane (i.e., no left-turns from northbound Coldwater Canyon Avenue to the southerly driveway would be permitted);
    - Southbound: Two through lanes and one right-turn lane; and
    - Eastbound: One optional left-turn/right-lane (controlled by a stop sign, with no left-turns permitted weekdays 7:00 a.m. – 7:00 p.m.).

The Proposed Project would also relocate school bus loading and unloading from Coldwater Canyon Avenue to within the Harvard-Westlake Campus, and eliminate the use of local streets by students and visitors for parking for all but the biggest special events, such as graduation and homecoming.

Athletic Field and Lighting

An open, approximately 330-foot long by 195-feet wide, 64,350-square foot athletic field comprised of synthetic turf would be located on the top level of the Parking Structure. The rooftop athletic field would be used for school-related athletic activities. An approximately 2,600 square foot facility (with equipment room, office and restrooms) would be located on the north end of the field. The athletic field would serve as an accessory use to the School. The rooftop athletic field would include nighttime lighting to be used as needed up to 8 pm during weekdays (no lights on weekends). The athletic field would be part of Harvard-Westlake's athletic program and would relieve the demand and use of the Campus' Ted Slavin Field, which is currently used for practice and game events for numerous sports. There would be no seating or public address system.

The 32-foot tall catchment fence, proposed around the perimeter of the athletic field would ensure that loose balls do not affect vehicles driving on Coldwater Canyon Avenue. Lighting for the field would be integrated

into the catchment fence with approximately 10 poles (each with two or three fixtures) located around the perimeter of the field reaching approximately seven feet above the catchment fence. Although the catchment fence is technically a structure, it would primarily consist of netting that would be marginally visible. Lighting would be directed towards the field and would include a state-of-the-art lighting system (such as Musco Green Systems) to prevent spillover lighting on to adjacent properties.

The proposed building would also include interior lighting from shielded LED, metal-halide or fluorescent fixtures on motion sensor controls for each level and in segregated areas. All interior lighting point sources would be shielded from exterior view.

Pedestrian Bridge

The Proposed Project also includes a pedestrian bridge crossing over Coldwater Canyon Avenue that would connect the proposed Parking Structure to the Harvard-Westlake Campus. The proposed pedestrian bridge would allow for safe crossing between the Parking Structure and the Harvard-Westlake Campus without stopping vehicles traveling along Coldwater Canyon Avenue. For safety reasons associated with the danger of speeding vehicles currently traveling along Coldwater Canyon Avenue, no pedestrian access to the Development Site would be provided from the street. The pedestrian bridge would be fully accessible in compliance with the requirements of the Americans with Disabilities Act.

The pedestrian bridge would reach a height of approximately 41 feet (approximately 18 feet as measured from the bottom of the bridge to the top of the bridge). The top of the elevator on either end of the bridge would reach 65 feet (West) and 46 feet (East) in height. The bridge would be 163 feet long and 13 feet wide and would provide a minimum vehicular clearance of approximately 25 feet 7 inches above Coldwater Canyon Avenue. Connection to the pedestrian bridge would be provided at Level 2 of the proposed Parking Structure and a bridge landing would be constructed on the Harvard-Westlake Campus. Pedestrians would be able to access the Harvard-Westlake Campus from the Parking Structure, and vice versa, only via the proposed pedestrian bridge crossing Coldwater Canyon Avenue. The bridge would be enclosed with a metal screen over Coldwater Canyon Avenue (between the elevator towers) to prevent objects from being thrown from the bridge. The bridge would be secured when the school is closed to prevent unauthorized access to the bridge.

Retaining Walls

Two retaining walls are also proposed on the Development Site to secure the hillside to the west. The primary retaining wall would be located on three sides (north, west and south) of the Parking Structure. Along the rear (west side) of the Parking Structure, the retaining wall would step back from east to west at the third level of the Parking Structure and would vary in height from 50 feet to 87 feet. The south face of the retaining wall would vary in height from 20 feet to 60 feet (from east to west), and the north face of the wall would vary in height from 30 feet to 70 feet (from east to west). The second retaining wall would be located on the north end of the Development Site, parallel to Coldwater Canyon Avenue. This retaining wall would vary in height from 4 feet to 28 feet (from north to south). Due to the topography of the Development Site, the retaining walls are necessary to protect the adjacent hillsides and to construct the Parking Structure.

The design of the retaining walls is intended to blend into the natural hillside area. The retaining walls also maximize the amount of open space areas to the west of the Parking Structure within the steep hillside that has been designated as “Desirable Open Space” on the Community Plan Land Use Map.

Landscaping

The Proposed Project would include vegetation on approximately 60% of the Development Site. The maximum proposed building footprint, or maximum lot coverage, is proposed to be 35.1%, plus an additional approximate 4.5% of hardscape areas. Approximately 39.9% of the site would remain with existing vegetation, and approximately 20.5% of the site would be newly landscaped using native vegetation. Additional landscaping is also proposed outside of the property lines along Coldwater Canyon Avenue. The vegetation would be designed to screen the new structure and minimize its appearance.

The Harvard-Westlake School main entrance driveway would also include new landscaping to provide an attractive entrance to the school.

Of the 315 protected trees located on the Development Site, 129 are proposed to be removed (12 oaks and 117 walnuts), 26 are proposed to sustain permanent encroachment and 160 are proposed to be preserved in place.[1]

To comply with the current Board of Public Works policy of requiring the replacement of protected trees at a 4:1 replacement ratio, the 516 mitigation trees (species to be approved by the City's Urban Forrester) are proposed to be planted on the open space areas of the Development Site (as noted above approximately 60% of the Development Site would be open space) or other locations as determined by the Forestry Division. See Section 3.3 for a more detailed discussion of impacts to protected trees and biological resources.

Given the significantly diseased condition of most of the walnut trees to be removed and the fact that there is currently no treatment available for the "thousand cankers disease" from which they suffer, mitigation is not proposed to include planting of any new Southern California black walnuts.

Changes to Harvard-Westlake Campus

As part of the Proposed Project, the Harvard-Westlake School main entrance driveway would be relocated approximately 37 feet to the south along Coldwater Canyon Avenue to align with the proposed northerly Project driveway (this would result in the loss of 140 parking spaces from the parking lots south of, and along, the main entrance driveway). Similar to the existing main entrance driveway, the proposed relocated intersection with the northerly Project driveway would be controlled by a traffic signal, with new traffic signal equipment provided based on LADOT requirements. The east landing of the pedestrian bridge would be constructed on the Harvard-Westlake Campus. A new pedestrian promenade would be created from the bridge in to the center of campus.

A bus pick-up/drop-off zone would be provided on the Harvard-Westlake Campus in an existing parking lot located at the south end of the Harvard-Westlake Campus (Southern Parking Lot), which would result in the elimination of the use of approximately 103 parking spaces from the Harvard-Westlake Campus. However, these 103 parking spaces would remain as overflow parking, as needed, for special events. Special events do not usually occur at the same time as regular bus activity. During special events associated bus service (team and event buses) would use the North Driveway (as at present).

Through the reconfiguration of the existing Main Entrance driveway into the Harvard-Westlake Campus and the resulting removal of 140 parking spaces from parking lots south of, and along, the main entrance driveway, and the 103 parking spaces displaced within the Southern Parking Lot, a total of 335 surface parking spaces would remain on the Harvard-Westlake Campus. With the development of the 750-space Parking Structure and the 335 remaining parking spaces, a total of 1,085 parking spaces would be provided on

[1] The number of protected trees impacted by the project was revised based on an updated tree count (see Appendix D.2A) because the construction footprint was revised to reflect an additional 15 feet of clear area atop the proposed retaining walls.

the Harvard-Westlake Campus. Approximately 121 off-site spaces (approximately 36 on Coldwater Canyon Avenue, 40 in the St. Michael's Church parking lot and approximately 45 spaces in the neighborhood) would no longer be used by Harvard-Westlake except for special events such as graduation and homecoming. See **Table 2-1** in the Project Description summarizes on-campus available parking under existing and proposed project conditions. **Figure 3.8-1** Existing Parking in Section 3.8 Transportation, Circulation and Parking, shows current parking locations.

PROJECT OBJECTIVES

The 578 parking spaces currently provided on the Harvard-Westlake Campus do not accommodate the parking demand generated by the school. The Harvard-Westlake Campus currently has one playing field (Ted Slavin Field), which cannot accommodate practices and games related to all of the numerous sports for boys and girls offered at the school, such as football, lacrosse, field hockey, soccer and track and field. Many of the school teams currently practice off-site.

The Proposed Project, which consists of the construction of a 750 space Parking Structure with rooftop athletic field, is guided by the following goals and objectives (see Chapter 2, Project Description for further details):

- Increase on-site parking supply for the Harvard-Westlake Campus for regular school use, as well as for typical school-related activities outside of regular school hours, essentially eliminating the need for school-related vehicles to park on-street, either on Coldwater Canyon Avenue or in the residential neighborhood north of the Harvard-Westlake Campus.

- Improve area circulation by removing vehicles and buses parking on Coldwater Canyon Avenue and on other nearby residential streets.

- Improve the flow of traffic on Coldwater Canyon Avenue by constructing public improvements at no cost to the City or to the community.

- Enhance safety and security associated with vehicular and pedestrian circulation on the Harvard-Westlake Campus and in the surrounding area.

- Enhance playing field facilities to increase opportunities for recreational activities on campus.

ENVIRONMENTAL REVIEW AND PROJECT APPROVAL

The formal environmental review process started with publication of a Notice of Preparation (NOP) that circulated from April 11, 2013 to May 13, 2013. A scoping meeting was held April 25, 2013. The NOP letters and comments received during the NOP comment period and at the scoping meeting are included in Appendix A of this DEIR.

This DEIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this DEIR.

This DEIR presents the results of the environmental analysis prepared for the Proposed Project. This document addresses potential Project environmental impacts, identifies appropriate mitigation measures and identifies any residual significant impacts after application of mitigation measures.

The Proposed Project is subject to review under the requirements of CEQA. The purpose of an EIR is to identify all potentially significant effects of a project on the physical environment, to determine the extent to which those effects could be reduced or avoided, and to identify and evaluate reasonable alternatives to the Project. The following discretionary actions are requested (see Chapter 2, Project Description for further details):

1. Vesting Conditional Use, pursuant to LAMC Section 12.24.T.3(b), a Conditional Use to permit the construction of a three-story parking structure with 750 parking spaces and a rooftop athletic field with a protective fence, netting and lighting, in the RE40-1-H and RE15-1-H Zones, as accessory uses to the Harvard-Westlake Campus. As part of the Conditional Use, minor revisions to the Site Plan for the Harvard-Westlake Campus are also requested to allow for a pedestrian bridge and bridge landing on the east side of Coldwater Canyon Avenue, the relocation of the Harvard-Westlake Campus' main driveway approximately 37 feet to the south off of Coldwater Canyon Avenue, minor alterations to the parking lot south of the main driveway (the Senior Parking Lot), and landscaping in the Senior Parking Lot.

   A. Proposed Parking Structure: Pursuant to LAMC Section 12.24.F., height and area regulations (in conjunction with the requested Conditional Use for the Parking Structure):

      i. Encroachments into portions of the front yard setback area (along Coldwater Canyon Avenue), to allow for the following setbacks, in lieu of the 25-foot front setback otherwise required by LAMC Section 12.21 C.10-1.

         a. A 20-foot front yard setback for the Parking Structure wall, a 13' 3" front yard setback for the athletic field, and an 11' 1" front yard setback for the fence support poles;

         b. A 15-foot front yard setback for the proposed retaining wall;

         c. A zero-foot front yard setback for the pedestrian bridge and ancillary bridge structures;

         d. A zero-foot front yard setback for the service access ramp needed for Fire Department access from Coldwater Canyon Avenue.

      ii. Encroachments into the southerly and southwesterly side yard setback areas, to allow for the following setbacks, in lieu of the 17-foot side yard setback otherwise required by LAMC Section 12.21 C.10-1.

         a. A zero-foot southerly side yard setback to accommodate a service access ramp needed for Fire Department access from Coldwater Canyon Avenue; and

         b. Zero-foot southerly and southwesterly side yard setbacks for a portion of the Parking Structure and retaining wall.

      iii. The following maximum heights for the Parking Structure and ancillary structures located on portions of the Development Site, in lieu of the 30-foot height limit otherwise required by LAMC Section 12.21 C.10-4.

         a. Approximately 41 feet 3 inches to the top of the pedestrian bridge,

         b. Approximately 64 feet 11 inches to the top of the elevator tower on the west side of the pedestrian bridge (the West Landing),

c. Approximately 44 feet 6 inches to the top slab of the Parking Structure,

d. Approximately 56 feet 6 inches to the top of the rooftop equipment room/offices on the Parking Structure,

e. Approximately 76 feet 6 inches to the top of the catchment fence on the rooftop of the Parking Structure,

f. Approximately 83 feet 6 inches to the top of the field lights secured above the catchment fence, and

g. Approximately 87 feet (maximum height of the tallest wall) for retaining walls.

iv. A maximum grading quantity of approximately 3,000 cubic yards in a Hillside Area on a lot in the RE15 Zone, in lieu of the 1,600 cubic yard maximum grading limit otherwise required by LAMC Section 12.21 C.10(f)(1), (or such amount as may be increased pursuant to LAMC Sections12.21 C.10(f)(3) and (4). (The Project would involve grading and export of a total of 135,000 cubic yards; however, 132,000 cubic yards are exempted from grading limitations pursuant to LAMC Section 12.21 C.10(f)(3).)

v. A maximum quantity of earth export of approximately 3,000 cubic yards in a Hillside Area, in lieu of the 1,000 cubic yard export limit otherwise required by LAMC Section 12.21 C.10(f)(2)(i), or such amount as may be increased pursuant to LAMC Sections12.21 C.10(f)(3) and (4). (The Project would involve export of a total of 135,000 cubic yards; however, 132,000 cubic yards are exempted from earth transport limitations pursuant to LAMC Section 12.21 C.10(f)(3).)

B. Main Portion of Campus: Pursuant to LAMC Section 12.24.F., related to height and area regulations (in conjunction with the requested Conditional Use Permit):

i. To allow for the bridge and bridge landing (the East Landing) to observe a zero-foot front yard setback into portions of the front yard setback area (along Coldwater Canyon Avenue), in lieu of the 25-foot front setback otherwise required by LAMC Section 12.21 C.10-1, and

ii. To allow for the a maximum height of approximately 45 feet 7 inches at the top of the East Landing;

2. Waiver of the Tentative Map Requirement under LAMC Section 91.7006.8.2, pursuant to the Department of City Planning's, Filing Procedures for Review of Grading Plans in Hillside Areas Having an Area In Excess of 60,000 square feet, dated January 11, 2012.

In addition to the Planning approvals identified above, the following approvals have been requested from other City agencies:

1. A Revocable Permit from the City of Los Angeles Board of Public Works to allow for a pedestrian bridge to cross Coldwater Canyon Avenue and be located within the front yard setback area along Coldwater Canyon Avenue.

2. An Airspace Vacation from the City of Los Angeles to allow a pedestrian bridge to cross Coldwater Canyon Avenue and be located within the front yard setback area along Coldwater Canyon Avenue.

3. Approval from the City of Los Angeles Cultural Affairs Commission for the design of the pedestrian bridge.

4. Approvals and permits from the City of Los Angeles for Project construction activities including, but not limited to the following: demolition, removal of protected trees, haul route, excavation, shoring, grading, foundation, and building and interior improvements.

Study Issues

Based on preliminary review of potential issues in the Initial Study (see **Appendix B**) and comments received during the scoping process, this EIR includes an analysis of the following environmental issue areas: Aesthetics; Air Quality and Greenhouse Gas, Cultural Resources (Archeological, Paleontological, and Human Remains Resources); Biological Resources; Geology, Soils and Hydrology (including Storm Water Drainage); Land Use; Noise, Transportation, Circulation and Parking. Other possible effects of the Project, (for example Cultural Resources (Historic Resources) and why these impacts were determined not to be significant are addressed in the Initial Study (**Appendix B**) and the General Impact Categories chapter of this EIR in Section 4.

AREAS OF CONTROVERSY

Comments received during the scoping period including at the public scoping meeting held April 25, 2013, indicate that potential areas of controversy include the following:

- Traffic impacts along Coldwater Canyon Avenue.
- Neighborhood intrusion (a parking structure and athletic field in a residential area).
- Existing noise problems (whistles) and anticipated noise impacts (primarily from athletic activities) to neighboring residential uses.
- Air quality impacts to surrounding uses.
- Impacts to trees and wildlife.
- Impacts to views from Coldwater Canyon Avenue and residences that surround the site (north and east of the site).
- Impacts to property values.
- Lighting impacts to adjacent land uses (residential and open space uses).
- Alternative locations, alternatives with fewer impacts.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table ES-1 provides a summary of Project impacts and mitigation measures and identifies level of significance after mitigation. **Table ES-2** provides a summary of issue areas addressed in comments on the NOP. Copies of the NOP and comment letters received can be found in **Appendix A**.

SUMMARY OF PROJECT ALTERNATIVES

As required by Section 15126.6 of the *CEQA Guidelines,* this EIR examines a range of reasonable alternatives to the proposed Projects. The analysis of Project alternatives in this EIR focuses on a reasonable range of alternatives consistent with CEQA Guidelines Section 15126.6(a). Several alternatives were considered but rejected from further analysis:

Off-Site (Leased) Parking. This EIR does not analyze an alternative on property that Harvard-Westlake does not own (for example leasing parking along Ventura Boulevard or elsewhere). Such an alternative is

speculative and infeasible at this time. In addition, parking facilities on Ventura Boulevard would cause logistical problems for students, faculty and staff in getting to campus in a timely fashion, potentially resulting in more traffic circulating between the campus and any facility on Ventura Boulevard. In addition, it is anticipated that such an alternative would not alleviate parking in the neighborhood as students would prefer to park closer to the School without the need of taking a shuttle.

Increased Transportation Demand Management (TDM). Harvard-Westlake has a complicated program of activities that includes a variety of after school programs. Most students and faculty arrive at the same time in the morning, but the end of the day involves numerous activities with staggered end times resulting in limitations on how much carpooling, transit and busing can be done by students and faculty. In addition, the Campus has numerous events where guests come to campus for relatively brief periods of time and need parking (e.g. parent teacher meetings, committee meetings, etc.). Increasing TDM is a mitigation measure that could help reduce demand for parking but not to the extent that additional parking would not be needed. Existing TDM at the School and the potential to increase TDM is discussed in Section 3.8 Transportation Circulation and Parking.

Subsurface Parking and/or Subsurface Tunnel Under Coldwater Canyon Avenue. The Campus is located at a low-point, or a sump, of an estimated 140-acre watershed, which makes the construction of a subterranean parking structure on the Campus infeasible. The Los Angeles County Department of Public Works Hydraulic and Hydrology Manual requires that new construction within a sump be designed to withstand the discharge from a 50-year storm event. (Los Angeles County Department of Public Works Hydraulic and Hydrology Manual.) Using the County's methodology, including rainfall data, it is estimated that the potential runoff from a 50-year storm would be approximately 440 cubic feet per second. Currently, there is a 24-inch reinforced concrete pipe storm drain, which has a capacity to drain less than 20 cubic feet per second. To satisfy the County's minimum requirement, significant additional infrastructure would need to be constructed beneath Coldwater Canyon Avenue to convey the large flow differential. Because of the required infrastructure and the existing infrastructure improvements beneath Coldwater Canyon and the resultant space limitations, it is not feasible to construct the additional required infrastructure to drain discharge from a 50-year storm event.

In addition, the Campus has a high water table, which creates potential safety concerns due to the potential higher incidence of flooding. The potential for rapid flooding with little warning and reliance on mechanical pumping of runoff increase the safety risk, making subterranean parking infeasible (on either side of Coldwater Canyon Avenue).

Constructing a partial subterranean parking structure (one subterranean level, one at grade level, and one above grade level and an athletic field on the top) on the west side of Coldwater Canyon Avenue would lower the height of the top of the structure by approximately 12 feet as compared to the project; however, this alternative would require that the base of the retaining wall be 12 feet deeper as compared to the Project, which would result in the retaining wall becoming more visible from Coldwater Canyon because the structure would be lower and the retaining wall would be set back further from Coldwater Canyon Avenue. In addition, this alternative would increase grading by approximately 44,000 cubic yards. The construction period would be extended by approximately 20 weeks (8 weeks for grading and 12 weeks for building construction) as compared to the Project. In addition mechanical ventilation of the subsurface parking would be required.

With respect to building a subterranean tunnel beneath Coldwater Canyon to connect the parking structure and the west side of the Campus, there are large-capacity infrastructure improvements beneath Coldwater Canyon Avenue, including the DWP's recently constructed city trunk water line, data/phone lines and storm water facilities, which make the construction of a tunnel under Coldwater Canyon Avenue infeasible. Additionally there are safety concerns associated with a high water table and potential flooding during storms.

Sports Field Only. Without providing increased parking, most of the project objectives would not be satisfied and therefore such an alternative is not required under CEQA. An alternative with reduced parking is considered in the analysis (see Alternative 3).

Smaller Parking Structures Throughout Campus. There are three main surface parking areas on-campus. None of them are large enough to allow construction of a practice field, which is one of the key objectives of the Proposed Project. Therefore, none of these locations is desirable for Harvard-Westlake. With respect to each of these parking areas: 1) development of the Southern Lot is addressed in Alternative 5 below; 2) development of a multi-story structure on the Senior Lot (north of the Southern Lot) would impede student circulation on the campus and would result in similar impacts to development of the Southern Lot potentially with additional impacts (visual quality, lighting and noise) to more residential uses to the east of Campus; and 3) development of the small lot at the northeast corner of Campus (Rugby Lot) would be severely constrained – access is by a single lane driveway that is bordered by buildings, topography and an adjacent ditch. In addition, surrounding residential development is located immediately adjacent to the parking area – all of these factors make development of a multi-story structure in this location infeasible.

The following alternatives address the CEQA-required No Project Alternative and provide a reasonable range of alternatives; these alternatives would reduce the potential environmental impacts of the Project:

1. No Project. For the short-term the Project Site would remain vacant and used for construction equipment storage.

2. Existing Zoning (4 homes). This alternative would result in continuation of school parking on- Coldwater Canyon Avenue and in adjacent neighborhoods. The Development Site would be improved with residential use consistent with the existing zoning.

3. Reduced Development (Two-Level Structure, No Athletic Field, No Pedestrian Bridge). This alternative would involve the construction of a two-level Parking Structure containing approximately 500 spaces. This alternative would not include an athletic practice field (and would therefore not include lighting on the top deck). There would be no activity on the roof of this structure. This alternative would not include a pedestrian bridge. Rather it would include a cross walk (with a signal). This alternative would not result in changes to the St. Michael's lot. Parking would continue in this lot and bus staging would remain on Coldwater Canyon Avenue. There would be safety concerns associated with the at-grade crossing and on-going bus operations in the immediate vicinity of the crossing. The Project would result in significant impacts related to construction noise and air quality. A two-level structure could incrementally reduce these impacts, but parking on Coldwater Canyon Avenue and the neighborhood to the north would continue to occur under this alternative. This alternative would not fully satisfy Project objectives.

4. Smaller Footprint Parking Structure, No Athletic Field, Rooftop Parking. This alternative would have the same number of spaces as the Project. Parking would occur on the roof level, therefore the footprint of the structure would be smaller than for the Proposed Project as there would be four levels of parking as compared to three under the Proposed Project. This alternative would not satisfy the Project objectives related to increasing opportunities for recreational activities on campus.

5. East Side of Coldwater Canyon Avenue Alternative – Southern Parking Lot. This alternative considers placing the parking structure on the Harvard-Westlake Campus on the Southern Parking Lot. Due to the smaller size of this site, the parking structure would be 10 stories plus rooftop parking.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
3.1 Aesthetics		
The Project would have a significant impact upon the visual character in the vicinity of the Development Site along Coldwater Canyon Avenue, a designated Secondary Scenic Highway.	RC-AES-1: Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. RC-AES-2: Building materials shall be of neutral colors designed to blend in with the surrounding hillside. The exterior of all buildings and fences shall be kept free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.15.	Less than significant.
The Project would have a significant impact upon views along Coldwater Canyon Avenue and from surrounding areas, which include the Coldwater Canyon Open Space and a designated Scenic Corridor approximately 185 feet south of the Development Site (corresponding to the outer corridor ½ mile buffer of the Mulholland Scenic Parkway Specific Plan). The site is topographically separated from the open space area which is generally about 100 feet to 200 feet higher than the Development Site.	PDF-AES-1: All open areas not used for buildings, driveways, or athletic facilities shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the decisionmaker. Natural areas shall be maintained as much as feasible in their natural state. The plant palette shall include extensive use of native vegetation. At a minimum, non-protected trees (4" diameter at breast height – dbh) to be removed from the site shall be replaced at a ratio of 1:1 (protected trees are addressed in Section 3.3 Biological Resources, they will be required to be replaced at a ratio of 4:1). Views of the Parking Structure from off-site areas shall be screened to the maximum extent feasible so that views of the site contain extensive vegetation and views of parking levels and the lighted athletic field are screened to the extent feasible (once plantings have reached maturity, which in general shall be within five years). PDF-AES-2: The orientation of the Parking Structure (along Coldwater Canyon Avenue close to the roadway) allows for the Development Site to maintain a large amount of open space to the rear, where the property shall remain in its natural vegetated state (trees planted to mitigate the loss of Protected Trees would be planted in this area) adjacent to land owned by the Mountains Recreation and Conservation Authority. PDF-AES-3: The proposed retaining walls shall be constructed with earth tone textures and finishes. The proposed cast-in-place concrete walls would be provided with a natural appearing rock finish and colored to match the indigenous rock.	Less than significant.
The Project would have no impact from shading in the area given its location within the east-facing hillside.	None necessary.	Less than significant.
Lighting of the pedestrian bridge would not impact surrounding uses. The lighting of the athletic field (up to 8 p.m. weeknights) would have a significant impact upon the adjacent residential and open space uses. (Topographic	RC-AES-3: Project lighting shall comply with LAMC Section 93.0117. As such, lighting shall not cause more than two footcandles of lighting intensity or direct glare from the light source at any residential property. PDF-AES-5: Lighting for the Pedestrian Bridge shall be integrated within the handrails and mounted at a height below the adjacent solid metal panels to eliminate any source of glare from the bridge. Light from the handrails shall illuminate the bridge walkway only and not spillover onto Coldwater Canyon Avenue. PDF-AES-4: Musco sports lighting fixtures (or equal alternative) with visor system shall be used to	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
separation serves to reduce this impact to many adjacent areas.)	illuminate the athletic field to provide better light control, reduce glare, and reduce the amount of spill light. Sports lighting fixtures shall be painted a natural green color so that they blend in to the natural surroundings. Sports lighting fixtures shall be on a time clock to ensure the fixtures are turned off at or before 8:00pm on weeknights. MM-AES-1: Any lighting related to construction activities shall be shielded or directed to prevent any direct illumination onto residential property located outside of the school property. MM-AES-2: Permanent exterior lighting shall incorporate fixtures and light sources that focus light onto the Project Site to minimize light trespass. MM-AES-3: Spillover light levels shall not exceed 0.0 foot candles on adjacent residential and open space properties (this mitigation measure shall not apply to property owned by Harvard-Westlake). MM-AES-4: The Project shall not use highly reflective building materials such as mirrored glass in exterior façades. All building materials shall be diffuse and of low reflectance to prevent potential glare. Examples of appropriate non-reflective building materials include cement, plaster, concrete, metal, and non-mirrored glass, and could likely include additional materials as technology advances in the future. MM-AES-5: All outdoor lighting (including athletic field lighting, security and landscape lighting) shall be designed and installed so that the lighting at residential and open space properties is minimized and in no event exceeds 0.0 footcandles (this mitigation measure shall not apply to property owned by Harvard-Westlake). Permanent exterior lighting shall be shielded to prevent direct views of the fixture source from adjacent residential neighbors. Fixtures shall also be focused properly to limit the amount of spillover lighting. MM-AES-6: The Parking Structure shall include appropriate measures to ensure that neither interior lighting of the structure nor headlights from cars using the structure cause light to disturb residents in the vicinity of the Development Site site to the north, west or east of the site across Coldwater Canyon Avenue. All interior parking garage fixtures shall be shielded to prevent direct views of the source when viewed from outside the structure. The design of the parking structure shall incorporate screening elements to prevent lighting and car headlights from disturbing residences around the project site. Interior lighting fixtures shall be controlled by photocells and occupancy sensors to reduce the light output of the fixtures when the structure is unoccupied. MM-AES-7: The Project applicant shall retain a lighting design expert to implement the following protocol to ensure compliance with all City lighting regulations, assumptions used in the EIR analysis and all mitigation measures no later than 6 months after certificate of occupancy: a) Six representative testing sites shall be established on or next to those light sensitive receptors that have the greatest exposure to site lighting (residential uses east of the Campus, and open space and residential uses to the west and north of the Development Site). b) A light meter mounted to a tripod at eye level, facing the Development Site, should be calibrated and measurements should be taken to determine ambient light levels with Project lights on. c) A reading should be taken with lights on and then with lights off to determine the change in ambient	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	light levels. d) The difference between the two would be the amount of light the Project casts onto the sensitive receptor. MM-AES-8: Building materials, including those on the pedestrian bridge shall be of low reflectivity to prevent potential glare reflected on to motorists along Coldwater Canyon Avenue. Lighting elements on the bridge shall be concealed to minimize spillover light on to the street below. MM-AES-9: An eight-foot-tall (total average height) cable retention system (to prevent rock fall) combined with a green chain link fence (with undulating top), with adjacent appropriate native plantings shall be constructed atop retaining walls to further assist in screening the structure and light and glare from the practice field on to adjacent residences.	
3.2 Air Quality and Greenhouse Gas		
While the Project would require a Conditional Use Permit, it would not result in uses inconsistent with the General Plan. The Project would provide ancillary parking for an existing use and would help improve traffic flow in the vicinity of the school. The Proposed Project would not generate new vehicle trips to the study area and there would not be an associated increase in regional emissions. Operations of the Parking Structure and athletic field would not interfere with implementation of AQMP control measures. Therefore, the Proposed Project would result in less than significant impacts related to consistency with the AQMP.	None required.	Less than significant.
Project construction (including truck trips) and operation would not generate significant amounts of criteria pollutants such that they would impact regional air quality.	None required.	Less than significant.
Project construction would	PDF-AQ-1: The majority of excavation and grading activity would occur during weekday daytime hours	**Significant and**

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
generate fugitive dust that would significantly impact PM_{10} concentrations (but not $PM_{2.5}$ concentrations) at six residences immediately adjacent to the construction site.	when most people are away from their home and not heavily utilizing residential yards. RC-AQ-1: Project Construction shall comply with SCAQMD Rule 403 that requires the following: – Water or a stabilizing agent shall be applied to exposed surfaces at least three times per day to prevent generation of dust plumes. – Construction contractor shall utilize at least one or more of the following measures at each vehicle egress from the Project Site to a paved public road in order to effectively reduce the migration of dust and dirt offsite: •Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long; •Pave the surface extending at least 100 feet and at least 20 feet wide; •Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or •Install a wheel washing system to remove bulk material from tires and vehicle undercarriages. – All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions). – Construction activity on unpaved surfaces shall be suspended when wind speed exceed 25 miles per hour (such as instantaneous gusts). – Ground cover in disturbed areas shall be replaced as quickly as possible. MM-AQ-1: The construction contractor shall use electricity from power poles rather than temporary diesel or gasoline generators. MM-AQ-2: When reinforcing the hillside through soil nailing, the construction contractor shall minimize dust to the greatest extent feasible using available techniques including, but not limited to, the application of water to remove cuttings. MM-AQ-3: The construction contractor shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications. MM-AQ-4: The construction contractor shall use alternative-fueled off-road equipment where possible. MM-AQ-5: The construction contractor shall configure construction parking to eliminate interference with traffic operations on Coldwater Canyon Avenue. MM-AQ-6: The construction contractor shall provide temporary traffic controls, such as a flag person, during all phases of construct to maintain smooth traffic flows. MM-AQ-7: The construction contractor shall schedule construction activities that effect traffic flow on arterial system to off-peak hours. MM-AQ-8: All construction equipment and delivery vehicles shall be turned off when not in use or prohibit idling in excess of five minutes. Haul trucks in particular that stage waiting to be called to remove dirt from the site shall not be allowed to idle while queuing. MM-AQ-9: The site administrator for Harvard-Westlake School shall coordinate with the construction	**unavoidable.**

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	contractor to schedule construction activity that utilizes heavy equipment and generates fugitive dust to when student exposure would be minimized.	
Emissions associated with Project operation (including localized emissions at the Parking Structure and adjacent to the bus staging area) would be less than significant.	None required.	Less than significant.
The Project would have a less than significant impact on odors (construction and operation).	None required.	Less than significant.
The Project would have a less than significant impact on greenhouse gas emissions.	None required.	Less than significant.
3.3 Biological Resources		
The Project would impact approximately 3.96 acres of the 6.22-acre survey area (the biological survey extended slightly beyond the site boundary to capture potential impacts on 0.74 acres not included in the Project site). The Project would impact approximately 1.05 acres of oak/walnut woodland (a significant impact), and approximately 2.91 acres of disturbed/ruderal area (a less than significant impact).	PDF-BIO-1: The Project as proposed specifies the retention of approximately 2.19 acres of native vegetation (oak woodland and other native species) on the Development Site (that shall function as a natural conservation area) with an additional 1.12 acres of new landscaping. To the extent that this area remains relatively free of human disturbance, it will continue to function as a component of the natural ecology of the area except in the immediate vicinity of the new development. MM-BIO-1 a. In order to insure that direct impacts to habitats are limited to those proposed, temporary fences or other marking devices shall be placed at the limits of grading prior to the onset of grading to guide equipment operators and keep them within the limits of grading and therefore ensure that impacts do not extend beyond the construction site. Earth-moving equipment shall be confined to areas within the designated daylight grading area at all times during construction. b. In coordination with the City's Urban Forrester and the Fire Department, a qualified biologist shall prepare a plan to identify appropriate plantings and plant communities to be used in the 2.19 acres of the site that is to remain in native vegetation. This area may include buffers of native vegetation adjacent to the Santa Monica Mountains Conversancy property. The plan shall include brush, boulder, and salvaged tree piles, reptile/underground mammal cover boards, and/or potential bat or other roosting habitats as appropriate. c. A qualified biologist shall use reasonable efforts to salvage seeds from on-site Protected Trees that are removed to be used on-site to mitigate loss of Protected Trees. d. Brush Clearance: a biologist shall supervise all LAFD-required brush clearance activities. For purposes of complying with LAFD requirements the following species shall be considered native trees (no matter what size): laurel sumac, elderberry, oak, toyon, walnut, and sugar bush; no live material shall be removed from	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	any native tree. e. Harvard-Westlake shall post signs around the native vegetation area indicating: "No Trespassing – Natural Habitat Area."	
The Project would result in the removal of 12 oaks, and 117 walnuts, encroachment would impact and additional 6 oaks and 20 walnuts. All these trees are protected by City ordinance.	RC-BIO-1: Oak/walnut woodland habitat will be mitigated in accordance with Los Angeles Municipal Code (LAMC) requirements. This mitigation will, by definition, reduce the level of impacts to less than significant. The Protected Tree Report for the Project indicates that the trees lost due to site development will be replaced at a 4:1 ratio with tree species and size to be as determined to be acceptable by the City. The Protected Tree Report shall be updated prior to approval of a removal permit. The applicant shall comply with the recommendations of the protected tree report as may be amended by the Advisory Agency and/or Urban Forester. The following list of recommendations and mitigation measures is summarized from the Protected Tree Report (see Appendix D.2): *The following recommendations apply to the Project as a whole, pertinent to all protected trees:* *2.a The applicant shall be responsible for notifying the Advisory Agency and/or the City Forester of any changes in the scope of the work and shall ensure that all work is performed in accordance with applicable ordinances, permits, and procedures. Work performed within the drip line of the trees shall be preceded by not less than 48 hours notice to the City Forester and the Project's Arborist (Certified/Registered Arborist).* *2.b Equipment, materials, and vehicles shall not be stored, parked or operated within the drip line of a protected tree.* *2.c Removal of the natural leaf mulch within the drip line of the protected trees onsite is prohibited except where absolutely necessary AND as approved by the Project's Arborist.* *2.d All trees not approved for encroachment shall be fenced prior to commencement of grading operations, and shall remain fenced until the City Forester approves removal of fencing.* *2.e Any pruning, including dead wooding, shall be performed in compliance with the latest ANSI pruning standards by a certified arborist (or certified tree worker) or under direction of a certified arborist. Smaller limbs should be tied back out of the way to avoid unnecessary pruning for equipment clearance.* *2.f Within 10 working days of completion of the work approved under this permit, the tree consultant shall provide a Project certification letter to the City Forester. The applicant shall be responsible for notifying and coordinating all conditions with the City Forester and the Project's Arborist.* *Mitigation for Tree Removals* *Mitigation recommendations for the protected oak and walnut trees are outlined below. Ten (10) oak trees and 94 Southern California black walnut tree are proposed to be removed by the Harvard-Westlake School Parking Structure Project.* *2.g Given the significantly diseased condition of most of the walnut trees to be removed and the fact that there is currently no treatment available for the "thousand cankers disease" from which they suffer, we do **not** recommend the planting of any new Southern California black walnuts.*	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	2.h *To comply with the 4:1 replacement ratio, at least 416 mitigation trees should be planted on-site in the remaining open space areas of the Harvard-Westlake property. See Appendix IV of the Protected Tree Report for the Conceptual Mitigation Planting Plan. Color-coding on the plan calls out areas potentially suited for the recommended mitigation trees for the site: Coast live oak (Q. agrifolia), California scrub oak (Quercus berberidifolia), western sycamore (platanus racemosa), and Mexican elderberry (Sambucus mexicana).* 2.i *Mitigation trees of the species called out herein may also be planted in the newly landscaped areas of the Project as approved by the City Forester.* 2.j *City guidelines for mitigation trees call for "15-gallon specimen[s] measuring one inch or more in diameter at a point one foot above the base and not less than seven feet in height, measured from the base." However, given that the majority of the removal trees are walnuts in poor condition that should not be replaced "in-kind", it is recommended that a range of smaller container sizes (such as one to five gallon) be allowed for mitigation trees in this Project. Multi-stemmed trees should be allowed for mitigation purposes. The City Forester shall determine the final container sizes acceptable for each replacement species.* 2.k *Mitigation trees should be planted in groups, or clusters, of three to five trees in a circular or triangular pattern to mimic natural groups of trees. The City Forester shall determine the final placement of each replacement tree and/or group of trees on a Final Mitigation Planting Plan.* 2.l *The replacement trees must be planted by a Tree Expert, as defined by the LAMC, and carefully planted to maximize likelihood of survival.* 2.m *All plantings will be generously watered immediately after planting and maintained for three years from the date of planting.* 2.n *The Project applicant shall post a bond acceptable to the City Engineer to guarantee the survival of these replacement trees and shall provide protected tree maintenance information to the landscape maintenance contractor responsible for the mitigation trees.* 2.o *The Applicant shall provide a copy of the final tree removal permit conditions of approval to the Project's Arborist.* 2.p *The Project's Arborist shall review the final landscape plan for compliance with the recommendations of this report and the final tree removal permit conditions of approval.* 2.q *The Project's Arborist shall be notified within one week prior to the commencement of mitigation tree planting.* 2.r *Within 30 days of all mitigation trees being planted, the Project's Arborist shall inspect the plantings with the landscape contractor and an "As-Built" Mitigation Planting Plan shall be prepared by the Project's Arborist and/or landscape architect on the Landscape & Irrigation Plan. This "as-built" plan shall be used to document the baseline placement and irrigation status of the mitigation trees for future monitoring visits by the Project's Arborist and will be used for the first mitigation trees monitoring report.*	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	2.s Three years of mitigation tree monitoring shall be documented by the Project's Arborist to the Applicant and the City Forester through a number of regularly scheduled site inspections and reports. The number and sequence of inspections over the three year period will be determined at the discretion of the City Forester in the final tree removal permit conditions of approval. *2.t Walnut trees that are not impacted by the Project, but die from Thousand Cankers Disease during the course of the Project construction and post-Project monitoring should be documented in the monitoring reports and recommendations for their removal may be made in the monitoring reports. Mitigation for the removal of dead walnut trees with confirmed TCD should not be required. This scenario should be addressed in the Project's tree removal permit conditions to the satisfaction of the City Forester and the Board of Public Works.* *Mitigation for Encroachment and Preservation of Trees* *160 protected trees will be preserved onsite; 26 will be permanently encroached upon within the drip line, including 20 walnuts and 6 oaks. Coast live oaks have a "good" relative tolerance to development impacts, but California black walnut has a "poor" relative tolerance and can "die slowly following even minor root injury or changes to water table…[and]…crown reduction pruning may be fatal" (Methany and Clark, 1989). Therefore, special care must be taken during Project implementation to minimize impacts to the root zones and canopies of these trees. Implementation of the following measures is recommended.* *2.u All work in the drip line of the trees approved for encroachment must be done using hand implements only; the use of mechanized tools is prohibited except where absolutely necessary AND as approved by the City Forester.* *2.v All work conducted within the drip line of the trees shall be performed in the presence of the Project's Arborist. The drip line shall commence from the outer edge of the tree canopy and extend inwards to the trunk of the tree.* *2.w Root-pruning within the drip line shall be reduced to the minimum amount that is absolutely necessary. All roots pruned shall consist of clean, 90º-angle cuts utilizing sharp hand tools and shall not be sealed unless directed by the City Forester. Any major roots (2" or greater in diameter) encountered shall be preserved to the extent possible, wrapped in moist burlap, until the soil is replaced. Soil shall be replaced as soon as possible around preserved roots.* *2.x Upon completion of the work associated with this permit, a three to four-inch layer of certified mulch is recommended to be placed on the ground within the drip line of the encroachment trees (keep mulch six inches away from the trunks). Where feasible, the native leaf litter should be retained and used as the mulching material.* *2.y All protected trees that have encroachment within their drip lines, or that end up being shaded out by new buildings, shall be monitored for possible failure as a result of Project implementation.* *2.z The applicant shall be responsible for the monitoring and maintenance of the encroachment trees for a minimum of three (3) years. If any of the protected trees should fail as a result of encroachment by the Project, they shall be replaced at a 4:1 ratio in accordance with the current*	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	policy of the City of Los Angeles Board of Public Works, or as approved by the City Forester at the time of replacement. The applicant shall be responsible for the monitoring and maintenance of any replacement mitigation trees for a minimum of three (3) years. If the replacement trees die during the three-year period, the applicant shall plant new replacement trees and the three-year monitoring period shall begin again from the date of that planting.	
The project could impact common wildlife species.	MM-BIO-2: An eight-foot-tall (total average height) cable retention system (to prevent rock fall) combined with a green chain link fence (with undulating top), with adjacent appropriate native plantings shall be constructed atop retaining walls to prevent wildlife from falling. In addition, all entrances to the garage shall be equipped with roll down doors that shall be closed at night to prevent wildlife from entering the structure.	
The Project could introduce undesirable species.	MM-BIO-3: To reduce the invasion of aggressively invasive exotic plant species into the Santa Monica Mountains no landscaping for the Project shall utilize any species found on the "CalEPPC List" -- more formally known as "Exotic Pest Plants of Greatest Ecological Concern in California." Furthermore, if any species found on this list "volunteer" in the Project area, whether in individual lots or common areas, they shall be removed immediately upon discovery. The current list can be found on the website: http://groups.ucanr.org/ceppc/Pest_Plant_List/	Less than significant.
Night-lighting could be detrimental to animals in adjacent open space areas.	MM-BIO-4: Shielded directional lighting, including, as appropriate, internal silvering of the globe or external opaque reflectors to direct light away from natural areas, and motion sensing technology that cause lights to only be on when required by the presence of people. All lighting adjacent to natural areas shall be low luminescence, directed downwards or towards the structure and shall include shielding to the extent necessary to prevent direct artificial illumination of natural areas and to protect nocturnal biological resources, as determined to be appropriate by a qualified biologist.	Less than significant.
The Project could impact protected species (Plummer's mariposa lily).	MM-BIO-5: Surveys for Plummer's mariposa lily shall be conducted during the May-July flowering period for the species. After Project approval, any Plummer's mariposa lilies located in the impact area will be relocated to suitable habitat outside the impact area.	Less than significant.
Construction would disturb wildlife in the immediate area. Some wildlife would return upon completion of construction, but some species would be permanently displaced.	MM-BIO-6: A wildlife salvage program shall be conducted within 14 days prior to the commencement of grading on the Project Site. The salvage effort will be conducted by a qualified wildlife biologist with experience capturing and handling native wildlife. Wildlife captured will be relocated to one of the local designated open space preserves.	Less than significant.
The Project could impact bird nesting on the Development Site. The impacts to oak/walnut woodland habitat would be mitigated through the replacement of trees as required by Mitigation Measure BIO2.	MM-BIO-7: All vegetation removal within the approved impact area will take place between September 1 and February 15, to the extent feasible. If construction takes place between February 15 and September 1, a preconstruction survey (by a qualified biologist) will be undertaken to identify any nests and any appropriate protective measures. This measure will protect any bird species from direct mortality as a result of Project construction and nest removal. It is assumed that bird species occurring on the site would leave the construction area at the onset of brush clearing. If construction begins before February 15, and proceeds continuously through the summer, weekly monitoring visits, by a qualified biologist, will be made to	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	determine if any birds are nesting in the remaining habitat onsite and if so whether they are being disturbed by construction activity. If any birds are found to be nesting, the biologist will determine if construction is reducing nesting success. If construction is found to be reducing nesting success, a buffer zone will be established within which construction will not occur until nesting is complete. The buffer zone shall be 500 feet for raptors and 200 feet for other bird species.	
The Project could impact foraging habitat for Cooper's hawk.	Impacts to the foraging habitat for Cooper's hawk will be addressed through the following measures: RC-BIO-1, PDF-BIO-1 and BIO-1.	Less than significant.
3.4 Cultural Resources (Archaeological, Paleontological and Human Remains Resources)		
The Project Site is rated low with respect to archeological and paleontological sensitivity. Therefore, the potential for encountering resources is considered low.	MM-CUL 1: If any archaeological materials are encountered during the course of project development, all further development activity shall halt and: o The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. o The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. o The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study or report. MM-CUL 2: Project development activities may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology, McCarthy Hall 477, CSU Fullerton, 800 North State College Boulevard, Fullerton, CA, 92834. MM-CUL3: Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit. MM-CUL 4: If any paleontological materials are encountered during the course of project development, all further development activities shall halt and: o The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology - USC, UCLA, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum - who shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. o The paleontologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource. o The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report. o Project development activities may resume once copies of the paleontological survey, study or report are submitted to the Los Angeles County Natural History Museum. MM-CUL 5: Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, paleontological reports have been submitted, or a statement indicating that no	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	material was discovered. A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit. MM-CUL 6**:** In the event that human remains are discovered during excavation activities, the following procedure shall be observed: o Stop immediately and contact the County Coroner: 1104 N. Mission Road, Los Angeles, CA 90033. 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday and Holidays) o The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Commission. o The Native American Heritage Commission will immediately notify the person it believes to be the most likely descendent of the deceased Native American. o The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. o If the descendent does not make recommendations within 48 hours the owner shall reinter the remains in an area of the property secure from further disturbance, or; o If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the Native American Heritage Commission. *Discuss and confer* means the meaningful and timely discussion careful consideration of the views of each party.	
3.5 Geology, Soils and Hydrology (including Storm Water Drainage)		
The Project would not expose people to substantial increased risk as a result of geologic hazard, liquefaction, subsidence, expansive soils.	RC-GEO-1: The applicant shall prepare a detailed Final Geotechnical Report to address site-specific geologic constraints of the site including soil conditions (including expansive soils) and stability. The Final Geotechnical Report shall incorporate recommendations from the Preliminary Geotechnical Report including recommendations related to erosion control, soil nail wall design, shoring and other site-specific conditions including seismicity, bedrock material, corrosivity and compressibility of soils, undocumented fill, etc. for design and construction of the Parking Structure. The applicant/contractor shall comply with all recommendations of the Final Geotechnical/Soils Report. A registered geologist shall monitor that recommendations of the Geotechnical Report are implemented as appropriate. RC-GEO-2: The Project shall be constructed in compliance with the LAMC and California Building Code and all other applicable regulations. RC-GEO-3: The Project shall comply with the following Department of Building and Safety requirements, prior to issuance of a grading permit for the Project: • Prior to the issuance of a grading permit by the Department of Building and Safety, the consulting geologist and soils engineer shall review and approve Project grading plans. This approval shall be conferred by signature on the plans which clearly indicate the geologist and/or soils engineer have reviewed the plans prepared by the design engineer and that the plans include the recommendations contained in the report.	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	• Prior to the commencement of grading activities, a qualified geotechnical engineer and engineering geologist shall be employed for the purpose of observing earthwork procedures and testing fills for conformance to the recommendations of the City Engineer, approved grading plans, applicable grading codes, and the geotechnical report approved to the satisfaction of the Department of Building and Safety. • During construction, all grading shall be carefully observed, mapped and tested (as appropriate) by the Project engineer. All grading shall be performed under the supervision of a licensed engineering geologist and/or soils engineer in accordance with applicable provisions of the LAMC and California Building Code and to the satisfaction of the City Engineer and the Superintendent of Building and Safety. • Any recommendations prepared by the consulting geologist and/or soils engineer for correction of geologic hazards, if any, encountered during grading shall be submitted to the Department of Building and Safety for approval prior to issuance of a Certificate of Occupancy for the Project. • Grading and excavation activities shall be undertaken in compliance with all relevant requirements of the California Division of Industrial safety, the Occupational Safety and Health Act of 1970 and the Construction Safety Act. RC-GEO-4: The Project shall conform to applicable criteria set forth in the Recommended Lateral Force Requirements and Commentary by the Structural Engineers Association of California. RC-GEO-5: The Project shall comply with the parameters outlined in the most recent California Building Code as designated for site-specific soil conditions. RC-GEO-6: The Project shall be designed to conform to the City of Los Angeles Seismic Safety Plan and additional seismic safety requirements not encompassed by compliance with the LAMC and California Building Code as may be identified by the Department of Building and Safety prior to Plan Check approval on each building. RC-GEO-7: During the rainy season (between October 1 and April 15 per the Los Angeles Building Code, Sec. 91.7007.1), an erosion control plan that identifies BMPs shall be implemented to the satisfaction of the City of Los Angeles Department of Building and Safety to minimize potential erosion during construction. The erosion control plan shall be a condition to issuance of any grading permit. RC-GEO-8: Appropriate erosion control and drainage devices shall be incorporated to the satisfaction of the Department of Building and Safety. Such measures include interceptor terraces, berms, vee-channels, and inlet and outlet structures, RC-GEO-9: If temporary excavation slopes are to be maintained during the rainy season, all drainage shall be directed away from the top of the slope. No water shall be allowed to flow uncontrolled over the face of any temporary or permanent slope. RC-GEO-10: Provisions shall be made for adequate surface drainage away from areas of excavation as well as protection of excavated areas from flooding. The grading contractor shall control surface water and the transportation of silt and sediment.	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	RC-GEO-11: The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by grading and hauling, and at all times shall provide reasonable control of dust caused by wind, at the sole discretion of the grading inspector. RC-GEO-12: Hauling and grading equipment shall be kept in good operating condition and muffled as required by law. RC-GEO-13 The Traffic Coordinating Section of the Los Angeles Police Department shall be notified at least 24 hours prior to the start of hauling. RC-GEO-14: Loads shall be secured by trimming or watering or may be covered to prevent the spilling or blowing of the earth material. If the load, where it contacts the sides, front, and back of the truck cargo container area, remains six inches from the upper edge of the container area, and if the load does not extend, at its peak, above any part of the upper edge of the cargo container area, the load is not required to be covered, pursuant to California Vehicle Code Section 23114 (e) (4). RC-GEO-15: Trucks are to be watered at the export site to prevent blowing dirt and are to be cleaned of loose earth at the export site to prevent spilling. RC-GEO-16: Streets shall be cleaned of spilled materials at the termination of each workday. RC-GEO-17: The applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads. RC-GEO-18: The applicant shall comply with all regulations set forth by the State of California Department of Motor Vehicles pertaining to the hauling of earth. RC-GEO-19: A copy of the approval letter from the City, the approved haul route and the approved grading plans shall be available on the job site at all times. RC-GEO-20: The applicant shall notify the Street Services Investigation & Enforcement Division at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations. RC-GEO-21: No person shall perform any grading within areas designated "hillside" unless a copy of the permit is in the possession of a responsible person and available at the site for display upon request. RC-GEO-22: A log noting the dates of hauling and the number of trips (i.e. trucks) per day shall be available on the job site at all times. RC-GEO-23: Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction. RC-GEO-24: Flag persons shall be required at the job site to assist the trucks in and out of the Project area. Flag persons and warning signs shall be in compliance with Part II of the latest Edition of "Work Area Traffic Control Handbook." The pedestrians shall be allowed to clear first prior to permitting the trucks to ingress or egress.	
The Project could cause erosion and sedimentation during	RC-HYDRO-1: The Project shall comply with the Low Impact Development (LID) Ordinance. Construction contractors of individual Projects shall be required to control erosion and runoff as necessary through the	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
construction.	use of site appropriate grading practices. Specifically, the construction contractor shall plan for and implement Best Management Practice (BMP) during construction to the satisfaction of the Department of Public Works, Bureau of Engineering, Stormwater Management Division City of Los Angeles, and/or other designated responsible agencies/departments. RC-HYDRO-2: Sufficient area shall be available so that runoff can be collected in bio swales as appropriate and directed to existing curb and gutter or storm drains. Swale design shall be coordinated with on-site hazardous materials issues as necessary. RC-HYDRO-3: The Project shall comply with applicable NPDES permit requirements, including preparation and implementation of a Stormwater Pollution Prevention Plan and Standard Urban Stormwater Mitigation Plan (SUSMP) in accordance with the Los Angeles Municipal Strom Water permit. The SUSMP shall identify post development peak runoff, conserve natural areas, minimize storm water pollutants, protect slopes and channels, and post construction Best Management Practices (BMPs) and other items as required by the permit.	
The Project would remove 135,000 cubic yards of earth altering the topography in the vicinity of the site.	None required.	Less than significant.
The Project could impact water quality during construction and operation.	RC-HYDRO-4: Runoff shall be treated, as required by SUSMP regulations, prior to discharging into existing storm drain systems. RC-HYDRO-5: All wastes from construction shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site. RC-HYDRO-6: Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains. RC-HYDRO-7: Material spills shall not be hosed down at the pavement if alternative clean-up methods are available, such as dry cleanup methods. RC-HYDRO-8: Dumpsters shall be covered and maintained. Uncovered dumpsters shall be required to be placed under a roof or covered with tarps or plastic sheeting. RC-HYDRO-9: Gravel approaches and dirt-tracking devices shall be used to reduce soil compaction and limit the tracking of sediment into streets. RC-HYDRO-10: All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be required to be conducted at an appropriate location. Drip pans or drop cloths shall be required to catch drips and spills. RC-HYDRO-11: Project construction shall comply with the General Construction Activity Stormwater Permit (General Permit) and the City's Development Construction Program pursuant to the NPDES Permit (Permit No. CA00401). RC-HYDRO-12: Article 4.4 of Chapter IV of the LAMC specifies Stormwater and Urban Runoff Pollution	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	Control requirements, including the application of Best Management Practices (BMPs). Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan (SUSMP) approved by Los Angeles Regional Water Quality Control Board, including the following, where applicable: • The Project applicant shall implement storm water BMPs to treat and infiltrate the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. • Post development peak storm water runoff discharge rates shall not exceed the estimated predevelopment rate for developments where the increase peak storm water discharge rate will result in increased potential for downstream erosion. • Clearing and grading of native vegetation at the Project Site shall be limited to the minimum needed to construct the Project, allow access, and provide fire protection. • Trees and other vegetation shall be maximized by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants. • Natural vegetation shall be promoted in landscaped areas. • Any identified riparian areas shall be preserved. • Appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code will be incorporated. • Outlets of culverts, conduits or channels from erosion by discharge velocities shall be protected by installing a rock outlet protection. Rock outlet protection is physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Sediment traps shall be installed below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain. • Any connection to the sanitary sewer will have authorization from the Bureau of Sanitation. • Impervious surface area will be reduced by using permeable pavement materials where appropriate. These include pervious concrete/asphalt; unit pavers, i.e. turf block; and granular materials, i.e. crushed aggregates, cobbles. • Roof runoff systems will be installed where site is suitable for installation. • Messages that prohibit the dumping of improper materials into the storm drain system adjacent to storm drain inlets shall be painted. • All storm drain inlets and catch basins within the Project area shall be stenciled with prohibitive language (such as NO DUMPING - DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping. • Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the Project area. • Legibility of stencils and signs must be maintained.	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	• Materials with the potential to contaminate storm water must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar storm water conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs. • The storage area will be paved and sufficiently impervious to contain leaks and spills. • The storage area shall have a roof or awning to minimize collection of storm water within the secondary containment area. • An efficient irrigation system shall be designed to minimize runoff including: drip irrigation for shrubs to limit excessive spray; shutoff devices to prevent irrigation after significant precipitation; and flow reducers. • Cleaning of oily vents and equipment will be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications. • Trash dumpsters will be stored both under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Containers will be washed in an area with properly connected sanitary sewer. • Wastes, including paper, glass, aluminum, oil and grease will be reduced and recycled. • Liquid storage tanks (drums and dumpsters) will be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. A secondary containment system such as berms, curbs, or dikes shall be installed. Drip pans or absorbent materials whenever grease containers are emptied will be used. • The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Storm Water Mitigation Plan and or per manufacturer's instructions. The Draft SUSMP prepared for the Project includes the following Project-specific BMPs: A. Structural BMPs *1. Kristar FloGard Plus Catch Basin Filter Inserts.* Kristar Catch Basin Filter Inserts, LA City research reference RR#5591 and LA City approval reference RR#5584, by KriStar Enterprises, Inc., which will be installed in both catch basins, are being proposed as structural BMPs for the removal of silt and debris in storm water runoff. The filter inserts have been selected to accommodate, up to and including, the 85th percentile storm event. See appendix “A” for calculations. See Appendix “B” for additional information including details and flow capacities. *2. Bio-swale.* In addition to the catch basin filter insert, bio-swale is being proposed as structural BMPs for the removal of silt and debris in storm water runoff. The bio-swale has been designed to accommodate, up to and including, the 85th percentile storm event. See Exhibit 1 of Appendix E.2. for details. Exhibits 1 and 2 in Appendix E.2 show the proposed Grading and Drainage Plan and the SUSMP Exhibit	

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	respectively. B. Non-structural BMPs *1. Open Paved Areas and Planter Areas.* a. Regular sweeping of all open and planter areas, at a minimum, on a weekly basis in order to prevent dispersal of pollutants that may collect on those surfaces. b. Regular pruning of the trees and shrubs in the planter areas to avoid formation of dried leaves and twigs, which are normally blown by the wind during windy days. These dried leaves are likely to clog the surface inlets of the drainage system when rain comes, which would result to flooding of the surrounding area due to reduced flow capacities of the inlets. c. Trash and recycling containers shall be used such that, if they are to be located outside or apart from the principal structure, they are fully enclosed and watertight in order to prevent contact of storm water with waste matter, which can be a potential source of bacteria and other pollutants in runoff. These containers shall be emptied and the wastes disposed of properly on a regular basis. *2. Education and Training.* The Harvard-Westlake Facilities Department shall be aware of the structural BMPs installed in the Project. Information materials, such as brochures, shall be available in the facilities Department offices for their complete information. Harvard-Westlake facilities department staff shall also be briefed about chemical management and proper methods of handling and disposal of wastes and should understand the on-site BMPs and their maintenance requirements. *3. Landscaping.* Minimize the use of pesticides and fertilizers to the maximum extent practical. *4. Monitoring and Maintenance* a. All BMPs shall be operated, monitored, and maintained for the life of the Project and at a minimum, all structural BMPs shall be inspected, cleaned-out, and where necessary, repaired, at the following minimum frequencies: 1) prior to October 15th each year; 2) during each month between October 15th and April 15th of each year and, 3) at least twice during the dry season (between April 16 and October 14 of every year). b. Maintenance procedures and recommendations outlined by KriStar Enterprises, Inc. shall be followed by the owner to ensure proper performance of the filter insert. c. Debris and other water pollutants removed from structural BMPs during cleanout shall be contained and disposed of in a proper manner. d. The drainage system and the associated structures and BMPs shall be maintained according to manufacturer's specification to ensure maximum pollutant removal efficiencies.	
3.6 Land Use		
The Project would not divide a community.	None required.	No impact.
The Project would be consistent with applicable plans and policies.	None required.	Less than significant.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
3.7 Noise		
Project construction would significantly impact up to four private residences surrounding the Development Site. (Vibration impacts would be less than significant.)	RC-N-1: All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors to the extent feasible. RC-N-2: The Proposed Project shall comply with the City of Los Angeles Noise Ordinance (LAMC Chapter XI), and any subsequent ordinances, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. RC-N-3**:** Construction and demolition shall be restricted to the hours of 7:00 a.m. to 6:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturday, and prohibited on all Sundays and federal holidays. RC-N-4: The Proposed Project shall comply with the LAMC Section 91.106.4.8, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety. MM-N-1: The construction contractor shall ensure that noise-generating equipment operated at the Development Site is equipped with the most effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures). MM-N-2: The construction contractor shall ensure that all equipment is properly maintained to prevent additional noise due to worn or improperly maintained parts. MM-N-3: The construction contractor shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than metal-tracked equipment). MM-N-4: The construction contractor shall minimize the use of equipment or methods with the greatest peak noise generation potential. MM-N-5: The construction contractor shall schedule construction activities to avoid operating several pieces of equipment simultaneously where feasible. MM-N-6: When possible, the construction contractor shall use on-site electrical sources to power equipment rather than diesel generators. MM-N-7: The construction contractor shall locate construction staging areas away from sensitive uses. MM-N-8: Two weeks prior to the commencement of construction at the Development Site, notification shall be provided to the immediate surrounding off-site residential uses that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period. MM-N-9: A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator	**Significant and unavoidable**.

TABLE 1-2: SUMMARY OF IMPACTS AND MITIGATION MEASURES

Description of Impact	Regulatory Compliance Measures (RC-), Project Design Features (PDF-), and Mitigation Measures (MM-)	Level of Significance After Mitigation
	shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator. MM-N-10: The site administrator for Harvard-Westlake School shall coordinate with the construction contractor to schedule construction activity such that student exposure to noise is minimized.	
Project operation of the Parking Structure and athletic field would not significantly impact noise levels at adjacent uses.	None required.	Less than significant.
3.8 Transportation, Circulation and Parking		
Project construction would impact adjacent roadways and intersections but not to a significant level. The applicant has indicated that construction on the site will not begin until construction on the DWP trunk line in Coldwater Canyon Avenue has progressed so that impacts will not overlap significantly.	None required.	Less than significant.
On completion of the Project, roadways adjacent to the site would be improved.	None required.	No impact.
The Project would not impact CMP intersections.	None required.	Less than significant.
The project would substantially reduce student parking in the neighborhood surrounding the school.	PDF-TR-1: The Parking Structure will include electric vehicle charging stations to encourage use of electric vehicles and encourage those with electric cars to park in the structure. MM-TR-1: Harvard-Westlake will issue to all students, staff, and faculty car parking permits which shall be required to be displayed on cars (stickers, rearview mirror hangers, or some other way to identify cars). Such stickers will allow neighbors and Harvard-Westward Administration a means of identifying any parking activity that continues in the neighborhood.	No impact.

TABLE ES-2: NOP COMMENT SUMMARY

Commenter Name	Comment in Support	Comment in Opposition	Public Notice	Project Description, Need for Project	Visual Quality, Views	Lighting	Air Quality	Biological Resources, Trees	Cultural Resources	Geology, Soils, Hydrology, Water Quality	Land Use Compatibility, Open Space and Planning	Construction Noise	Operational Noise	Existing Noise	Fire Protection	Traffic, Parking, Access and Safety	Growth Inducing Impacts to School, Future Plans	Alternatives	Property Values	Miscellaneous/Other
LETTERS/E-MAIL																				
California Department of Fish and Wildlife								X												
Metropolitan Transportation Authority																X				
City of Los Angeles Department of Transportation																X				
Los Angeles Fire Department															X					
Native American Heritage Commission									X											
South Coast Air Quality Management District							X													
Santa Monica Mountains Conservancy (9/23/13)					X			X		X								X		
Karen Abrams						X							X			X	X		X	
Richard Adams						X		X		X			X		X					X
Walter Afanasieff (letter indicating agreement with Bruce Lurie letter see below)																				
Parker and Carol Andrews (indicates general agreement with Bruce Lurie Letter see below)				X	X	X		X		X	X	X	X			X	X			X
Jeffrey Berk																				
Sarah Boyd (2 e-mails)				X	X	X		X			X		X	X		X		X		
Douglas P. Carstens, Chatten-Brown & Carstens (comments supplementing those by Jennifer Rothman, Esq. whose letter is also attached)			X	X	X		X	X		X	X	X	X			X		X		X
Sonia Choi Johns		X		X	X														X	

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Harvey Coldwater		X	X								X									X
William L. Dean, PE		X									X									
Eliza Dilberti		X			X		X	X		X	X					X		X		
Geneva DuVall (2 e-mails)					X		X			X						X				
Shirley and Harold Engel (3 e-mails)		X			X	X					X	X	X			X	X	X	X	X
Alan Fiske (4 e-mails)		X			X		X	X				X	X							
Karl Gerber		X			X		X				X		X	X		X		X		
Keith Henry					X	X							X			X				
Patrick Holder		X									X					X				X
Tom and Kathi Holland						X		X					X						X	X
Joanna Ikeda																X				
Alex Izbicki					X		X	X		X	X					X		X		
Jeffrey S. Jacobs					X	X	X				X		X	X		X				X
Susan Jacobs (2 e-mails)				X	X	X	X			X			X				X		X	X
Jeffrey and Susan Jacobs					X			X					X			X				
Mary Ann Jacobson		X		X												X		X		
J. Johnson and L. Nitta (2 letters)		X			X		X			X	X		X			X	X	X		X
Peter Juzwiak (2 e-mails) also agrees with Bruce Lurie Letter see below		X	X	X	X	X		X		X	X		X			X		X		X

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Rosemary Leibowitz		X		X				X								X		X		
Bruce Lurie (5 e-mails; 2 attachments)		X	X	X	X	X		X		X	X		X		X	X	X	X		X
Rae Markus		X			X			X		X		X	X					X	X	
Gwyn McColl (2 e-mails)		X		X	X	X		X			X	X	X	X		X				
Vedra Mehagian				X		X	X	X		X		X	X			X	X	X		X
Nate Mendel		X			X	X		X			X		X			X		X		
Bruce Pompan	X				X											X				
Joan Reese	X				X											X				X
Alexa Roman		X		X	X		X			X			X			X	X			X
Jennifer Rothman (2 e-mails/letters)		X	X	X	X	X	X	X		X	X			X	X	X	X	X		X
Sari and Arden Rynew (4 e-mails) and Dr. Edward Gilbert, MD (Letter included within)			X	X		X					X					X				X
Lisa Sarkin			X																	
Warren Zavala and Sarah Self (2 e-mails)			X		X										X	X			X	X
Patricia Shelllogg (2 e-mails)		X		X	X		X	X			X	X	X			X	X	X	X	X
Michael Stevens																X				
Tom and Cathy Tardio				X			X	X	X	X	X		X					X		
Debra Van Tongeren and John Van Tongeren	X				X											X				X
Michael Vos			X	X								X					X			X

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Suellen Wagner				X	X							X	X			X		X		X
Dana Witt		X			X	X				X						X				
Grace Wu		X					X													X
HANDWRITTEN COMMENTS AND COMMENTS SUBMITTED AT SCOPING MEETING																				
"Adjoining Neighbor"				X	X		X				X	X	X			X		X		X
"adjoining neighbor"							X			X	X									X
"Adjoining Neighbor"					X	X	X	X			X	X	X	X		X		X		
"adjoining neighbor"					X			X			X					X				X
"within 500 feet neighbor"					X						X	X	X							X
"adjoining neighbor"						X						X	X	X						
"adjoining neighbor within 500 feet"					X															X
"ADJACENT NEIGHBOR"				X	X		X			X	X						X	X		X
Dr. Edward Gilbert, MD, Parker Andrews, Carol Andrews, Keith Henry, Janene Gerber, Jim Johnson, Sarah Boyd, Peter Juzwiak,				X	X										X	X				
Steven Weinstein	X				X															
David E. Van Iderstine	X				X	X										X				
Scott Oulette	X				X					X		X	X							
No name provided					X	X		X		X	X	X	X			X		X		X
No name provided					X		X				X							X		X

TABLE ES-2: NOP COMMENT SUMMARY

Commenter Name	Comment in Support	Comment in Opposition	Public Notice	Project Description, Need for Project	Visual Quality, Views	Lighting	Air Quality	Biological Resources, Trees	Cultural Resources	Geology, Soils, Hydrology, Water Quality	Land Use Compatibility, Open Space and Planning	Construction Noise	Operational Noise	Existing Noise	Fire Protection	Traffic, Parking, Access and Safety	Growth Inducing Impacts to School, Future Plans	Alternatives	Property Values	Miscellaneous/Other
Barry Johnson																		X		
Stan Karas				X		X						X				X				X
Richard Adams						X		X								X				
Jim Johnson					X		X	X		X	X		X			X				
Tina and Jeff Lam (no comments on card)																				
Jack Witz			X																	
David Connors				X			X											X		
Rev. Dan Justin					X					X						X		X		
Peter Juzwiak					X			X		X						X	X	X		
Sari Rynew							X				X	X	X			X				
Jon Boorstin				X	X											X	X			
Geoff Johns							X					X	X					X		
Sarah Boyd		X			X	X						X	X			X				X
Zachary Rynew													X		X	X				
Arden Rynew		X						X								X				X
Vedra-Nancy Mehagian				X		X						X								X
Leni Boorstin					X	X		X								X				
Carol Andrews		X						X				X	X							X
Gaye Howard	X																			

TABLE ES-2: NOP COMMENT SUMMARY

Commenter Name	Comment in Support	Comment in Opposition	Public Notice	Project Description, Need for Project	Visual Quality, Views	Lighting	Air Quality	Biological Resources, Trees	Cultural Resources	Geology, Soils, Hydrology, Water Quality	Land Use Compatibility, Open Space and Planning	Construction Noise	Operational Noise	Existing Noise	Fire Protection	Traffic, Parking, Access and Safety	Growth Inducing Impacts to School, Future Plans	Alternatives	Property Values	Miscellaneous/Other
Lynda and Ed Fadel	X																			
James David	X				X															
William Calvert	X																			
Jenny Stewart	X																			
Jon Boorstin				X													X			
Missy Calvert	X				X											X				
Catherine Maynes	X																			
Scott Maynes	X																			
Caryn Maynes	X																			
Abby Hope	X																			
Claudia Margolis	X															X				
Dani Staahl	X				X											X				
Bruce Eliot	X															X				
Carlos Villalta	X															X				
Tobey Victor	X															X				
Francis Hyde	X															X				
Shirley Hahn	X															X				
Esther Chung	X				X											X			X	
Nasreen Babu_Khan	X															X				

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Frank Birney	X																			
Xi Zhang	X															X				
Sandra Klink	X																			
Amy Lasser	X															X				
Debra Van Tongeren	X															X				
John Van Tongeren	X															X				
Bea and Erik Ridgley	X															X				
Portia Collins	X																			
Michael Thacher	X				X							X	X			X				
Howard Lemhoff	X															X				
Allyson Jones Caso	X															X				
Alan Caso	X															X				
Rhonda Rundle	X			X	X		X						X			X				
Geoffrey Hansen												X				X				X
Ann-Marie Whitman	X															X				
Melanie Stangs	X															X				
James and Jenny Stewart	X															X				
Lori Belateche	X															X				
Elizabeth F. Hailey			X		X				X	X							X			