

4.0 GENERAL IMPACT CATEGORIES

SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires that any significant impacts, including those that can be mitigated but not reduced to a less than significant level, be described and their implications discussed in an EIR. Impacts of the Project are analyzed and identified throughout Section 3, Environmental Setting, Impacts and Mitigation Measures, of this ~~Draft~~ RDEIR; impacts are summarized in the Executive Summary. As discussed therein, project-level significant unavoidable impacts that could occur under the Proposed Project are anticipated to be as follows:

- ~~Impacts related to localized construction emissions would remain significant at six sensitive receptors (homes on the west side of Coldwater Canyon Avenue, adjacent to the construction site), even after the implementation of mitigation measures. The majority of localized impacts related to PM₁₀ emissions during grading and excavation activity would be related to fugitive dust emissions (up to 80 percent). The Proposed Project would be required to implement SCAQMD Rule 403 to control fugitive dust emissions (RC AQ-1). Rule 403 requires intensive dust prevention control measures and represents the greatest degree that fugitive dust can be controlled at a construction site. Implementation of Rule 403 and Mitigation Measures MM-AQ1 through MM-AQ5 would reduce fugitive dust emissions to the greatest extent feasible but would not reduce PM₁₀ emissions to below the SCAQMD significance thresholds. Therefore, the Proposed Project would result in a short-term significant and unavoidable impact related to localized PM₁₀ construction emissions.~~
- Impacts to oak-walnut woodlands could result in Project-specific impacts to sensitive species (San Bernardino ringneck snake and coastal western whiptail) and a cumulatively considerable contribution to loss of oak-walnut woodland habitat and other sensitive species that forage on the Development Site on occasion.
- Mitigation measures would reduce construction noise levels but not below a level of significance during the most impactful phase of construction (excavation, hauling, soil nailing and placing shotcrete). Mitigated construction noise levels would exceed the 5-dBA significance threshold at about 36-51 sensitive receptors (homes on the east and west side of Coldwater Canyon Avenue in the vicinity of the Development Site and the St. Michael's Church (which includes Sunnyside Preschool).

Despite these significant adverse impacts the Project is being proposed in order to address a number of traffic and parking issues in the vicinity of Harvard-Westlake School and the need for a practice field to increase recreational activities on Campus (see the Objectives sub-section of the Project Description chapter).

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) requires that an EIR analyze significant irreversible environmental changes that would be caused by ~~the Proposed~~ a project. This includes the use of nonrenewable resources during construction and operation of a project to such a degree that the use of the resources thereafter is unlikely. It also includes significant and irreversible environmental changes that could result from environmental accidents associated with ~~the~~ a project.

Implementation of the Proposed Project would include the construction of a Parking Structure that ~~that~~ would result in a commitment of limited, slowly renewable, and nonrenewable resources. Such resources would include certain types of lumber and other forest products; metals such as steel, copper, and lead; aggregate

materials used in concrete and asphalt (e.g., stone, gravel, and sand); and other construction materials such as plastic. In addition, fossil fuels used in construction vehicles would also be consumed during construction of the Project.

Implementation of the Proposed Project could facilitate the continued consumption of limited, nonrenewable, and slowly renewable resources. These resources would include electricity, petroleum-based fuels, fossil fuels, and water. However, even without the Project, students, faculty, staff and visitors would still travel to the Project area. The Parking Structure would not ~~generate any result in any additional~~ trips once completed. Operation of the Project would occur in accordance with Title 24, Part 6 of the California Code of Regulation, which sets forth conservation practices that would limit the amount of energy consumed by the Project. In addition, the Project would be subject to energy efficient planning and construction guidelines set forth by the City of Los Angeles. Nonetheless, the use of such resources would still continue to represent a long-term, irreversible commitment of these resources. However, this resource consumption would be consistent with growth and anticipated change in the Los Angeles region.

GROWTH INDUCING IMPACTS OF THE PROPOSED PROJECT

CEQA Guidelines Section 15126.2(d) requires that an EIR discuss growth-inducing impacts of a ~~Proposed Project~~ project. Growth-inducing impacts are ways in which a project could "...foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." This includes projects that would remove obstacles to growth. However, as stated in the CEQA Guidelines (Section 15126.2[d]), "it must not be assumed that growth in any areas is necessarily beneficial, detrimental, or of little significance to the environment."

The Proposed Project would provide parking for an existing use. It would not induce population growth in the area. Parking does not determine enrollment at the Harvard-Westlake School. Rather the capacity of the ~~school~~ Harvard-Westlake School is determined by the number and size of classrooms, students per class, hours of operation and other factors. Enrollment at the Harvard-Westlake School is not anticipated to increase in the foreseeable future as a result of the project. Enrollment is approximately 900 students with approximately 300 students in each of the three high school grades – 10th, 11th and 12th (enrollment fluctuates due to a variety of factors).

Improvements to Coldwater Canyon Avenue in front of the ~~site~~ Development Site would improve circulation in the immediate vicinity of the ~~school~~ Harvard-Westlake School but would not be sufficient to attract increased traffic through the area.

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 by the Harvard-Westlake School, such as football, lacrosse, field hockey, soccer and track and field. Many of the school teams currently practice off-site. The Harvard-Westlake School would be able to hold simultaneous practice sessions on separate fields instead of on the same field as currently occurs. The practice field atop the Parking Structure would provide recreational opportunities for existing students and would therefore not be growth-inducing.

POTENTIAL SECONDARY EFFECTS

CEQA Guidelines Section 15126.4(a)(1)(D) states that, "[i]f a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measures shall be discussed but in less detail than the significant effects of the project as proposed."

The RDEIR identifies mitigation measures to address Project impacts as feasible. Mitigation measures to address aesthetic impacts include requirements to develop and maintain the building in an attractive manner, and shielding lighting. These measures would not result in additional impacts.

In order to reduce on-site dust the applicant will be required to water the ~~site~~ Development Site (or use a stabilizing agent) ~~measures to reduce dust including watering the site~~ at least three times per day. Use of this water would result in an incremental but less than significant demand for water.

Mitigation also includes use of alternative fuels, minimizing idling time, and other techniques to minimize emissions, none of which would result in additional adverse impacts.

In order to address Project impacts on protected trees, the RDEIR identifies planting a substantial number of new trees as a requirement for the Project. The mitigation measure is specific as to how new trees will be planted in order to avoid additional impacts.

Measures to reduce impacts on geology and hydrology including erosion control, drainage and other BMPs would not result in additional adverse impacts.

Mitigation measures to reduce noise include scheduling and other actions including locating staging areas away from sensitive uses in order to minimize noise levels from on-site equipment.

In summary, none of the mitigation measures identified in this RDEIR are anticipated to result in additional adverse impacts beyond those addressed in Chapter 3.

EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines requires that an EIR contain a brief statement indicating the reasons that certain possible significant effects of a project were determined to be less than significant and thus, were not analyzed in the EIR. Discussions of those impacts found not to be significant are included in the Initial Study (Appendix B). In addition, some of the issue areas analyzed in the ~~Draft~~ RDEIR were found to be less than significant. These issue areas are fully discussed in the Executive Summary and Chapter 3 of this RDEIR.

Issues Found to Have No Impact or be Less Than Significant in the Initial Study (not Including Issues Analyzed in RDEIR)

Agriculture and Forest: The Proposed Project would be infill development located within the urbanized City of Los Angeles. "Forest land" is land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. The Project would not conflict with existing zoning for agricultural, forest land, timberland use, or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland or forestland. While the Development Site does include ~~2.76~~ 3.33 acres of Southern live oak/southern walnut woodland (approximately half the Development Site), this area is not managed for public benefit. Therefore, no impact would occur.

Cultural Resources (Historic Resources): The Harvard-Westlake ~~Upper School~~ Campus includes City of Los Angeles Historic-Cultural Monument No. 32, Saint Saviour's Chapel. It was listed in 1965. The ~~chapel~~ Saint Saviour's Chapel was built in 1914 at the original campus of the Harvard School at Western Avenue and Venice Boulevard. It was designed by Reginald Johnson, the son of the first Episcopal bishop of Los Angeles. When the campus moved to its present Studio City location in 1937, the ~~chapel~~ Saint Saviour's Chapel was

divided into 16 pieces and moved to the new campus. There are no other known resources in the vicinity of the Development Site. No changes are proposed to the ~~chapel~~ Saint Saviour's Chapel or to its immediate vicinity. Therefore, there would be no impacts to an historical resource.

Hazards and Hazardous Materials: Construction of the Proposed Project would involve the use of potentially hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Operation of the Parking Structure would not involve the routine transport, use, or disposal of hazardous substances other than minor amounts of cleaning materials and fuels in parked vehicles as well as herbicides or pesticides that would be used for landscaping. The quantities of such products are not expected to be large enough to create a potential hazard to the public or environment through their routine transport, use or disposal. Hazardous materials would be handled in accordance with federal OSHA and California OSHA standards. Therefore, impacts would be less than significant.

The Development Site is not on a list of hazardous materials sites. Previous uses on the Development Site have included residential use and construction staging. Implementation of the Parking Structure would not create a significant hazard to the public or the environment. Therefore, less than significant impacts would occur.

The hillside areas of Los Angeles are located in a Mountain Fire District that are subject to increased risk of fire due to topography. The Project would include irrigated landscaping that would help reduce the risk of fire. The Project would not increase risk of wildland fire. The Project includes the vacation of a paper street - Hacienda Drive west of Coldwater Canyon Avenue; the City Fire Department raised no objection to the proposed vacation.¹ Therefore, no impact would occur.

Mineral Resources: The Development Site is not located within or adjacent to City-designated Oil Field/Drilling Areas (La Cienega Oil Field, LA City Oil Field, LA Downtown Oil Field). No impacts to the availability of mineral resources are anticipated. Implementation of the Proposed Project would not result in the loss of availability of any known mineral resources. Therefore, no impact would occur.

Population and Housing: The Proposed Project would not develop residential uses, and therefore, would not induce population growth. The Project would be an ancillary use to an existing school, which would not result in an increase in student population. Therefore, no impact would occur.

Public Services and Utilities: While the Proposed Project is located in a Mountain Fire District, it would include irrigated landscaping that would help reduce the risk of fire. The Project would not increase risk of wildland fire. The Proposed Project would not induce growth and would not result in an increase in demand for fire and police services, parks or schools. The Proposed Project ~~could~~ would include bathrooms, which would connect to the public sewer system resulting in potential minor incremental increases in wastewater flows. The Proposed Project would adhere to all applicable Regional Water Quality Control Board (RWQCB) requirements and policies. Construction and implementation of the Proposed Project would not exceed wastewater treatment requirements of the ~~Regional Water Quality Control Board (RWQCB)~~. The Proposed Project includes a ~~debris catchment~~ basins as well as a flow-through planter bio-swale that would help in managing and cleansing stormwater. Implementation of BMPs (discussed in the RDEIR in the Hydrology section) would occur in accordance with City requirements. Therefore, impacts are anticipated to be less than significant with mitigation. Solid waste management is guided by the California Integrated Waste Management Act of 1989 that emphasizes resource conservation through reduction, recycling, and reuse of

¹ City of Los Angeles Inter-departmental Correspondence Re: Street Vacation No. E1401273, John N. Vidovich, Fire Marshall May 28, 2015; see Appendix J.

solid waste. All local, State, and federal guidelines regarding solid waste will be complied with during Project construction and operation, including Assembly Bill 1327, which requires that adequate areas for collecting and loading recyclable materials be provided. Therefore, no impacts would occur.

Issues Found to be Less Than Significant in this RDEIR

Aesthetics – Visual Character, Views, Shading, Lighting: With mitigation included in the Project (appropriate selection of construction materials and substantial vegetative screening) the level of impact to visual character and views is anticipated to be less than significant given that the surrounding hillsides are substantially developed with homes, the relatively short segment of Coldwater Canyon Avenue (a designated Secondary Scenic Highway) where the Project (Parking Structure and pedestrian bridge) would be visible, the low intensity and shielded lighting throughout the Project, the open architecture of the Parking Structure and pedestrian bridge and the topographic separation of the site Development Site from adjacent open space owned by the Mountains Recreation and Conservation Authority (Coldwater Canyon Open Space) and the identified Scenic Corridor.

Given the location of the ~~Project~~ Development Site nestled in to an ~~east-west~~-facing hillside, the Proposed Project does not have the potential to cause significant shading impacts.

In general, based on the experience at Ted Slavin Field, spillover lighting would be less than 1 fc at distances greater than 90 feet from the Parking Structure (i.e. at the closest residence). Therefore, the proposed ~~athletic practice field~~ would result in less-than-significant impacts related to light and glare. However, the lighted field would be visible from a number of homes and yards in the surrounding area, which could be annoying to some residents.

Air Quality and Greenhouse Gas – Consistency with AQMP, Construction Criteria Pollutants, Localized Significance Thresholds, Project Operation, Odors, Greenhouse Gas Emissions: The Proposed Project would be consistent with the assumptions of the AQMP. With mitigation, regional emissions during construction of criteria pollutants would be below SCAQMD thresholds. Project construction would not result in emissions exceeding SCAQMD localized significance thresholds. The Project would not generate new trips and operation of the ~~structure~~ Parking Structure would not generate emissions that would exceed SCAQMD thresholds. The Project would not result in unusual odors beyond those normally associated with construction activities. Greenhouse gas emissions would be below applicable thresholds.

Biological Resources – ~~sensitive habitats, Protected Trees, Introduced Species, protected species listed species, disturb wildlife, nesting birds, foraging habitat.~~ On Upon completion of the Proposed Project approximately ~~60~~ 64% of the site Development Site would remain in open space/landscaping, will be more densely forested and will be maintained in a scenic and attractive setting. The majority of the area to be impacted by the Project was previously disturbed. The Proposed Project includes on-site (and as appropriate off-site) replacement of ~~impacted~~ protected trees at a ratio of 4:1.

Cultural Resources (Archeological, Paleontological, and Human Remains Resources): The Project Site includes areas that have previously been disturbed (on the Harvard-Westlake Campus on the east side of Coldwater Canyon Avenue and on the Development Site where ~~four~~ two residences were previously located) as well as vegetated hillsides. No archeological or paleontological resources or human remains are known to exist in the immediate vicinity of the Development Site and no impacts are anticipated. In the unlikely event that resources or remains are encountered during excavation, the standard City conditions would be imposed.

Geology, Soils, Hydrology (including Storm Water Drainage) – ~~risk due to geologic hazard, erosion, topographic alteration, water quality~~ Risk Due to Geologic Hazard, Erosion, Topographic Alteration, Water Quality: The Proposed Project would be constructed to meet all applicable codes relevant to geology and

hydrology and would incorporate BMPs to reduce any drainage or water quality impacts.

Land Use – ~~division of a community, consistency with plans and policies~~ Division of a Community, Consistency with Plans and Policies: The Proposed Project would be across a roadway from the ~~school~~ Harvard-Westlake School use that it would be associated with. The north and east-facing slopes that occupy more than a third of the Development Site are heavily vegetated and provide a substantial buffer from adjacent uses. Therefore, the Project would not divide, disrupt or isolate an existing community. The Project would be generally consistent with applicable plans and policies.

Noise – Project operation: The Project would not generate new trips and the noise associated with the Parking Structure and ~~Athletic Field~~ practice field is not anticipated to rise to a significant level.

Transportation, Circulation and Parking – Project construction, traffic flow, Congestion Management Plan: Construction traffic would impact local streets but not to the extent that it would result in a significant impact. On completion the Project would not ~~generate any new~~ result in any additional trips, ~~other than during construction.~~ The Proposed Project would change turning movements and parking layout. With the roadway improvements included in the Project and the ability for students to park in the ~~new~~ Parking Structure rather than in the neighborhood, impacts are generally anticipated to ~~be~~ improve in the immediate vicinity of the ~~School~~ Harvard-Westlake Campus.