

**DEPARTMENT OF
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(213) 978-1300

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**CITY OF LOS ANGELES
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MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

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DEPUTY DIRECTOR

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DEPUTY DIRECTOR

ENV-2017-4220-MND

Project Location: 16100–16180 West Mulholland Drive, Los Angeles, CA 90049

Community Plan Area: Brentwood–Pacific Palisades Community Plan Area

Council District: 11—Bonin

Project Description: The Project proposes improvements within the existing 5.46-acre Mirman School for Gifted Children campus (the Project Site). Specifically, the Project would include: a new two-story, 16,130-square-foot Learning Center building with eight new classrooms, administrative space and a campus courtyard; improvements to the school's existing library building, including renovations to the existing building and the addition of 2,619 square feet of new floor area including a new classroom; the creation of a new classroom within the school's existing physical education building; a new security pavilion with 140 square feet of floor area and associated pedestrian gate; a new playground with a 6-foot-tall vine-covered plastered wall, shade structure and storage cabinets; replacement of the existing outdoor amphitheater in the upper campus with a new seating area and shade structure; and a new 1,370-square-foot storage/trash/recycling enclosure. The Project also proposes a Lot Line Adjustment (LLA) whereby a 0.56-acre parking lot and hillside area currently owned by Berkeley Hall School and Bel Air Presbyterian Church immediately adjacent to the southwestern most portion of the Project Site would be added to the Project Site, a portion of which would be developed with the proposed 1,370-square-foot storage/trash/recycling enclosure. The Project would retain the existing 46 vehicle parking spaces used by the School, which would meet LAMC requirements for the Project, and would increase on-site bicycle parking from 4 to 44 spaces. In all, the Project would: increase the size of the Project Site from 5.46 to 6.02 acres; add 22,508 square feet of new floor area to the School's existing 42,678 square feet of floor area, for a total of 65,186 square feet (with all floor area in residential floor area [RFA] as defined by LAMC Section 12.03); and increase the floor area ratio (FAR) at the Project Site from 0.18:1 to 0.25:1. The Project would result in an increase in school capacity from 330 to 430 K–8 students and an increase the number of school employees from 78 to 108 employees. Project construction would occur in a single phase, with construction anticipated to start in June 2022 and be completed in July/August 2023 (with full occupancy of the new facilities anticipated in 2025). To achieve the proposed project, the applicant is proposing the partial demolition of existing uses and approximately 1.45 acres of grading, including approximately 7,400 cubic yards (cy) of cut and 5,200 cy of fill, resulting in a total of 12,600 cy of grading and 2,200 cy of soil export. A total of 19 trees, none of which are protected, are proposed for removal and 18 trees, nine of which may be protected, are expected to be impacted by construction. The applicant proposes the removal of one non-protected street tree (shamel ash).

Requested entitlements include a Vesting Conditional Use Permit as well as approval of a Mulholland Scenic Parkway Specific Plan Exception, Project Permit Compliance, and Design Review. The proposed Lot Line Adjustment will be processed under a separate ministerial review and is not subject to review under CEQA. The Project will also require haul route approval by the Board of Building and Safety Commissioners.

PREPARED FOR:

The City of Los Angeles, Lead Agency
Department of City Planning

PREPARED BY:

Eyestone Environmental, LLC

APPLICANT:

Mirman School for Gifted Children

NOVEMBER 202

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1 INTRODUCTION

An application for the Project has been submitted to the City of Los Angeles Department of City Planning for discretionary review. The Department of City Planning, as Lead Agency, has determined that the Project is subject to the California Environmental Quality Act (CEQA), and that the preparation of an Initial Study is required.

This Initial Study evaluates the potential environmental effects that could result from the construction, implementation, and operation of the Project. This Initial Study has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (Title 14, California Code of Regulations, Section 15000 et seq.), and the City of Los Angeles CEQA Guidelines. As of May 2019, all new CEQA analysis undertaken by the City of Los Angeles (City) utilizes the questions in CEQA Guidelines Appendix G, Environmental Checklist Form, as the CEQA thresholds of significance. This Initial Study is intended as an informational document, which is ultimately required to be considered and certified by the decision-making body of the City prior to approval of the Project.

1.1 PURPOSE OF THIS INITIAL STUDY

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

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, the Lead Agency shall adopt a Negative Declaration. If the Initial Study identifies potentially significant effects but revisions have been made by or agreed to by the applicant that would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, a Mitigated Negative Declaration (MND) is appropriate. If the Initial Study concludes that neither a Negative Declaration or MND is appropriate, an EIR is normally required.

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into sections as follows:

1 INTRODUCTION

Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.

2 EXECUTIVE SUMMARY

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

3 PROJECT DESCRIPTION

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

4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

1.3 CEQA PROCESS

In compliance with the State CEQA Guidelines, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that with implementation of mitigation, the Project would not have a significant effect(s) on the environment and a MND will be appropriate for the Project. As set forth in Section 15072 of the CEQA Guidelines, the City, as the Lead Agency for the Project, will provide a notice of intent to adopt an MND to the public, responsible agencies, trustee agencies, and the county clerk to allow the public and agencies to review the proposed MND. Pursuant to Section 15105 of the CEQA Guidelines, the public review period for a proposed Negative Declaration or MND shall be not less than 20 days (or 30 days when a proposed Negative Declaration or MND is submitted to the State Clearinghouse for review by state agencies).

2 EXECUTIVE SUMMARY

ENVIRONMENTAL CASE NO.	ENV-2017-4220-MND
RELATED CASES	CPC-2017-4219-VCU-SPE-DRB-SPP-MSP

PROJECT LOCATION	16100–16180 West Mulholland Drive, Los Angeles, CA 90049
COMMUNITY PLAN AREA	Brentwood–Pacific Palisades Community Plan Area
GENERAL PLAN DESIGNATION	Minimum Residential
ZONING	RE40-1-H
COUNCIL DISTRICT	11—Bonin

LEAD AGENCY	City of Los Angeles
CITY DEPARTMENT	Department of City Planning
STAFF CONTACT	Laura Frazin Steele, City Planner
ADDRESS	6262 Van Nuys Boulevard, Suite 430, Van Nuys, CA 91401
PHONE NUMBER	(818) 374-9919
EMAIL	laura.frazinsteele@lacity.org

APPLICANT	Mirman School for Gifted Children
ADDRESS	16100–16180 Mulholland Drive, Los Angeles, CA 90049
PHONE NUMBER	(310) 476-2868

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by the Project. The impacts for each of these environmental factors would be less than significant with implementation of the mitigation measures included in this MND.

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

DETERMINATION

On the basis of this initial evaluation:

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

Laura Frazin Steele

Laura Frazin Steele, City Planner

11.9.2021

EVALUATION OF ENVIRONMENTAL IMPACTS

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

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project proposes improvements within the existing 5.46-acre Mirman School for Gifted Children campus (the Project Site). Specifically, the Project would include: a new two-story, 16,130-square-foot Learning Center building with eight new classrooms, administrative space and a campus courtyard; improvements to the school's existing library building, including renovations to the existing building and the addition of 2,619 square feet of new floor area including a new classroom; the creation of a new classroom within the school's existing physical education building; a new security pavilion with 140 square feet of floor area and associated pedestrian gate; a new playground with a 6-foot-tall vine-covered plastered wall, shade structure, and storage cabinets; replacement of the existing outdoor amphitheater in the upper campus with a new seating area and shade structure; and a new 1,370-square-foot storage/trash/recycling enclosure. The Project also proposes a Lot Line Adjustment (LLA) whereby a 0.56-acre parking lot and hillside area currently owned by Berkeley Hall School and Bel Air Presbyterian Church immediately adjacent to the southwestern most portion of the Project Site would be added to the Project Site, a portion of which would be developed with the proposed 1,370-square-foot storage/trash/recycling enclosure. The Project would retain the existing 46 vehicle parking spaces used by the School, which would meet LAMC requirements for the Project, and would increase on-site bicycle parking from 4 to 44 spaces. In all, the Project would: increase the size of the Project Site from 5.46 to 6.02 acres; add 22,508 square feet of new floor area to the School's existing 42,678 square feet of floor area, for a total of 65,186 square feet of floor area (with all floor area in residential floor area [RFA] as defined by LAMC Section 12.03); and increase the floor area ratio (FAR) at the Project Site from 0.18:1 to 0.25:1. Additionally, the applicant is proposing approximately 1.45 acres of grading, including approximately 7,400 cubic yards (cy) of cut and 5,200 cy of fill, resulting in a total of 12,600 cy of grading and 2,200 cy of soil export. A total of 19 trees, some of which may be protected, are proposed for removal and 18 trees, some of which may be protected, are expected to be impacted by construction. The applicant proposes the removal of one non-protected street tree (shamel ash). However, this analysis gives no rights to the applicant to remove any street tree or protected tree. No street trees or protected trees may be removed without prior approval of Urban Forestry based on compliance with LAMC Section 62.169 and 62.170 and applicable findings.

An Alternative LLA Scenario is also proposed in the event the Bel Air Presbyterian Church portion of the proposed LLA cannot be acquired by the School whereby the LLA area would be reduced to 0.46-acres and a smaller storage/trash/recycling enclosure would be developed in the existing outdoor amphitheater portion of the School, with a smaller seating area and shade structure at that location. The storage portion of the proposed storage/trash/recycling enclosure would not be developed under this scenario.

The Project would result in an increase in school enrollment from 330 to 430 K–8 students and an increase in the number of school employees from 78 to 108 employees. Project construction would occur in a single phase, with construction anticipated to start in June 2022 and be completed in July/August 2023 (with full occupancy of the new facilities anticipated in 2025).

The requested Project entitlements include: (1) a Vesting Conditional Use Permit for the use and expansion of a private school (K-8) in the RE40 Zone, including revisions to current entitlement conditions regulating school operations; (2) an Exception from the Mulholland Scenic Parkway Specific Plan to allow

a reduced northerly front yard and westerly side yard; (3) a Project Permit Compliance and Design Review Approval pursuant to the Mulholland Scenic Parkway Specific Plan and LAMC; and (4) other discretionary and ministerial permits and approvals that may be deemed necessary. In addition, ministerial approval of the proposed LLA will be required, as well as a Haul Route Approval by the Board of Building and Safety Commissioners.

3.2 ENVIRONMENTAL SETTING

3.2.1 Project Location

The existing 5.46-acre Mirman School for Gifted Children campus is located at 16100-16180 West Mulholland Drive (Project Site) within the Brentwood–Pacific Palisades Community Plan Area of the City. The Project Site is located within the Inner Corridor/Institutional Use Corridor of the Mulholland Scenic Parkway Specific Plan (Ordinance No. 167,943 adopted May 13, 1992 and ZI-1224). Local access is provided by Mulholland Drive which runs along the northern boundary of the Project Site, with regional access provided by the Interstate 405 (I-405) freeway located approximately 0.5 mile to the east. The Project Site is bounded by Mulholland Drive to the north, Berkeley Hall School to the south, a Prominent Ridge (as designated by Mulholland Scenic Parkway Specific Plan Maps 6 and 7) followed by Milken Community High School and Curtis School to the east, and Westland School and a parking lot to the southwest and west. A Project location map is provided in Figure 1, and an aerial photograph of the Project Site and vicinity is included in Figure 2.

3.2.2 Existing Conditions

The Mirman School for Gifted Children is a private elementary and middle (K–8) school that has been in operation on the Project Site since approximately 1971 pursuant to multiple previously approved Conditional Use Permits (CUPs) and related entitlements (primarily, case numbers ZA-19543, ZA-92-0858-CUZ-YV, and CPC-2010-3300-CU-ZAA-DRB-SPP-1A). Over the years, the school has expanded its operations and facilities to accommodate its elementary and middle school students. Approval of Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A authorized the school's most recent expansion of its existing operations, including the construction of an athletic field and ancillary uses east of the main school buildings. Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A also incorporated and updated the conditions of approval from the school's prior entitlements, and therefore currently serves as the governing entitlement approval for the school.

Existing development within the Project Site includes eight buildings and structures totaling 42,678 square feet of floor area. Existing buildings range from one to two stories (15 to 30 feet in height) and occur in a compact cluster set back from Mulholland Drive. On the northern portion of the Project Site, the Project Site includes two existing one-story academic buildings, classrooms, a two-story library, a one-story physical education building, offices, restrooms, and art classrooms. Two other one-story academic buildings are located south of an existing fire lane that traverses the Project Site. The existing buildings surround a series of linked landscaped courtyards that open to the playfield located on the Project Site and a hillside. The Project Site contains 46 on-site parking spaces within a parking area located adjacent to Mulholland Drive in the northern portion of the Project Site. As part of the approval under Case No CPC-2010-3300-CU-ZAA-DRB-SPP (October 10, 2012), the City authorized the construction of new athletic facilities and a new 2,000-square-foot physical education building on the Project Site. In conformance with these approvals, the Applicant constructed a new athletic field, the physical education building, two basketball courts, a handball court, and new landscaped areas. Vehicular and emergency access to the Project Site is provided by existing school driveways along Mulholland Drive. Emergency access is also provided by an existing fire lane connecting Mulholland Drive to Berkeley Hall School to the south. A site plan of the existing uses within the Project Site is provided in Figure 3.

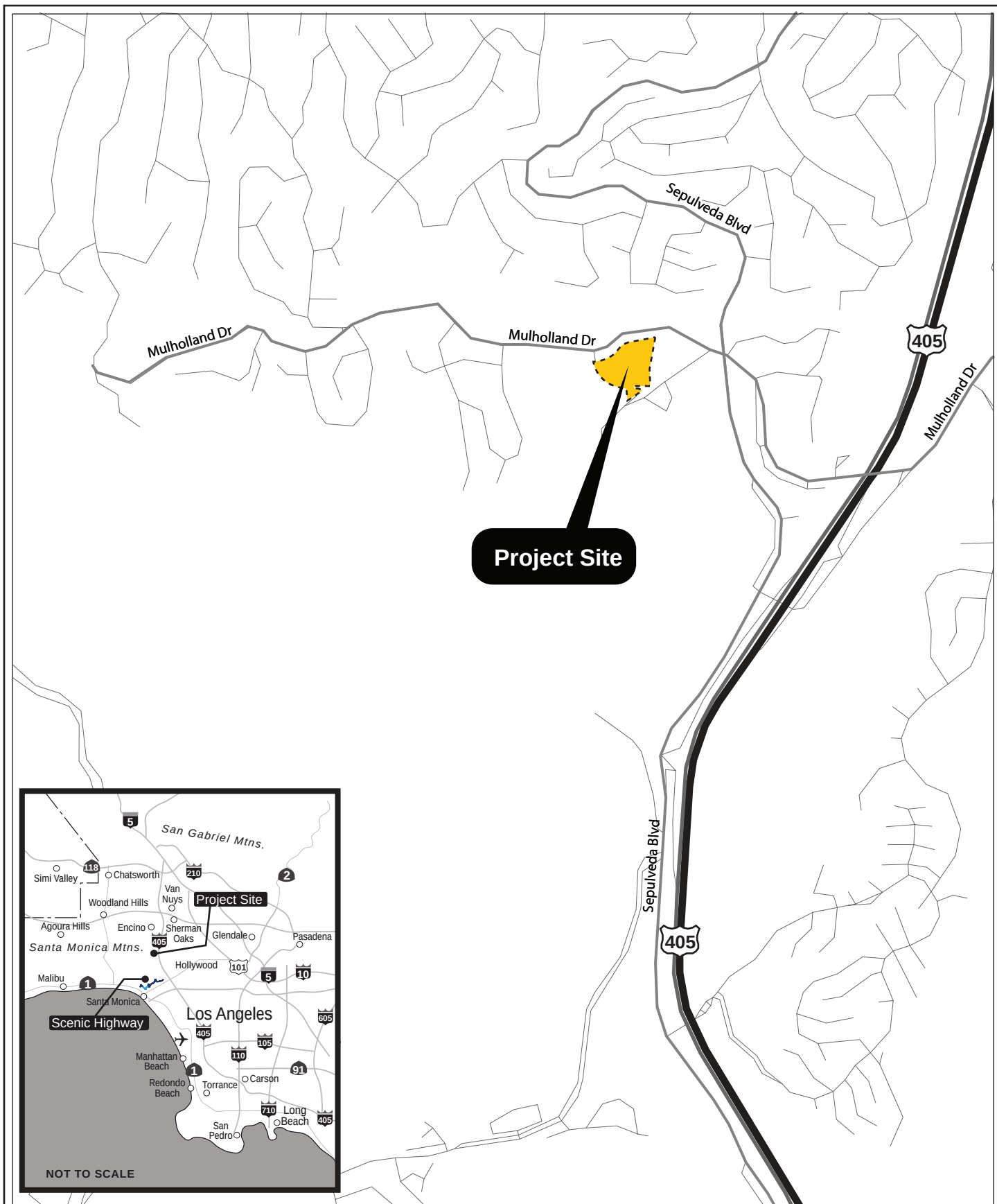


Figure 1
Project Location Map

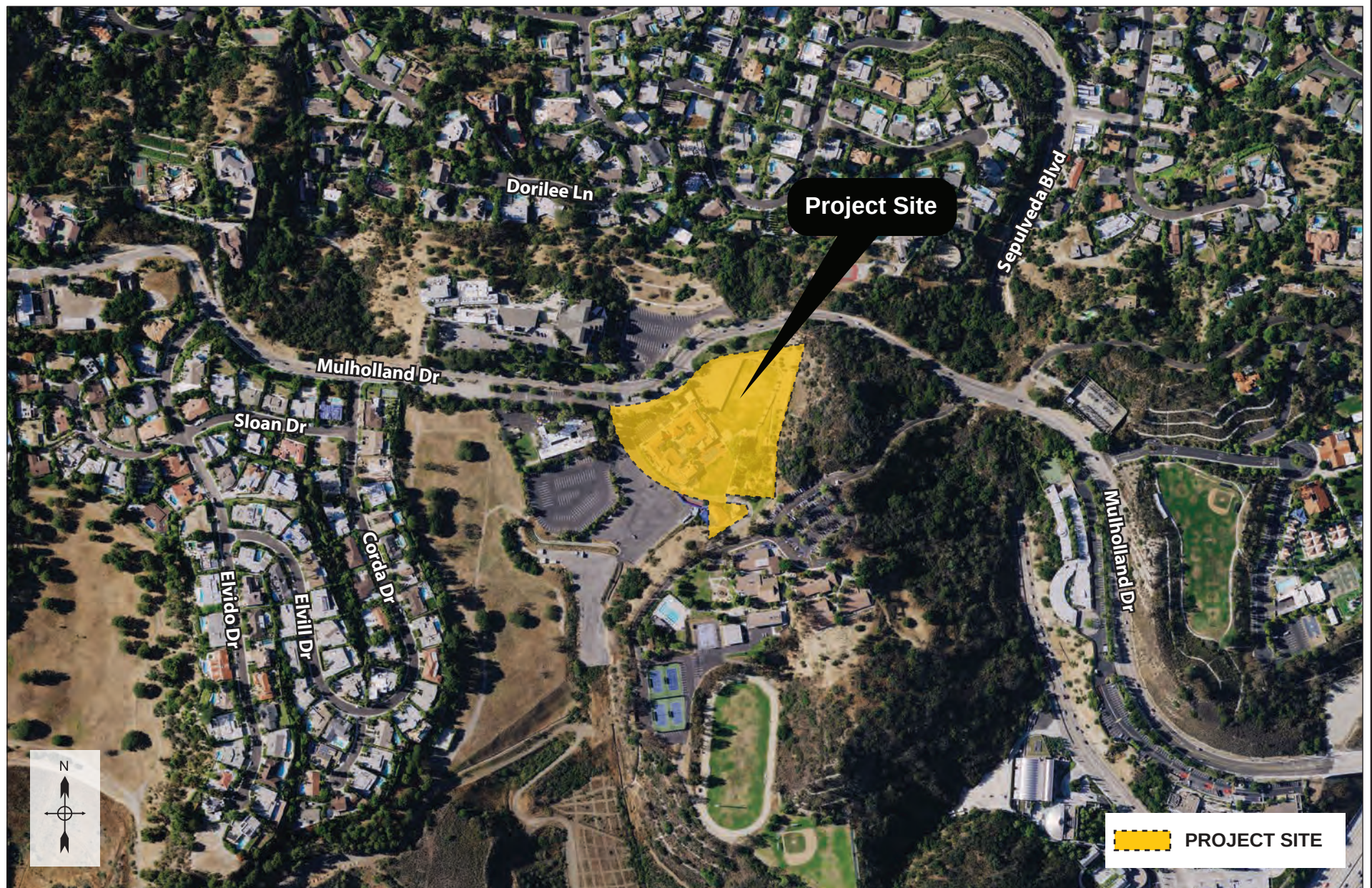
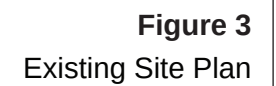


Figure 2
Aerial of the Project Site and Vicinity



The Project Site contains landscaping in the form of trees, hedges, and shrubs. While the Project would encroach upon nine sycamore trees, the applicant states that these trees were planted in 2015- 2016 as part of the school's recent campus improvements. The Urban Forestry Division will review the applicant's evidence and tree report and determine if these trees are native to the project site, and apply any required replacement. (See Arborist Report prepared by Kay J. Greeley, amended July 14, 2021, and included herein as Appendix 4).

The Project Site is located within the Brentwood–Pacific Palisades Community Plan Area which designates the Project Site as Minimum Residential. The Project Site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside Area) which permits single-family residential and accessory uses, as well as private schools pursuant to the City Planning Commission's approval of a CUP. The Project Site is also located within the Inner Corridor/Institutional Corridor area of the Mulholland Scenic Parkway Specific Plan, which imposes additional design and development regulations along Mulholland Drive. The Project Site is located within an Airport Hazard Zone (550 feet Height Limit Above Elevation 747), a Very High Fire Hazard Severity Zone, a Special Grading Area, a Landslide Zone, and is located approximately 3.16 miles from the nearest known fault (Hollywood Fault). The Project Site is not located within a Hazardous Waste Zone, a Methane Hazard Site, a High Wind Velocity Area, an Alquist Priolo Fault Zone, a Liquefaction Zone, or a Tsunami Inundation Zone.

As shown in Figure 1, primary regional access is provided by I-405, which runs generally north–south approximately 0.5 mile east of the Project Site. Major arterials providing regional access to the Project Site and vicinity include Mulholland Drive and Sepulveda Boulevard.

3.2.3 Surrounding Land Uses

As shown in Figure 2, the Project Site is located in the Santa Monica Mountains in an area that includes residential, educational, church, and open space uses. Land uses surrounding the Project Site include: the Bel Air Presbyterian Church and associated parking lot and hillside area to the north, across Mulholland Drive; undeveloped hillside/ridge area and Berkeley Hall School to the south; a ridgeline designated as a prominent ridge by the Mulholland Scenic Parkway Specific Plan to the east; and Westland School and a parking lot owned by the Bel Air Presbyterian Church to the west, followed by an undeveloped lot and then a residential subdivision located along Corda Drive further to the west (approximately 800 feet from the Project Site). Beyond the ridge to the east are the Milken Community High School and Curtis School.

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Overview

The Project proposes improvements within the existing 5.46-acre Mirman School for Gifted Children campus (the Project Site). Specifically, the Project would include: a new two-story, 16,130-square-foot Learning Center building with eight new classrooms, administrative space and a campus courtyard; improvements to the school's existing library building, including renovations to the existing building and the addition of 2,619 square feet of new floor area including a new classroom; the creation of a new classroom within the school's existing physical education building; a new security pavilion with 140 square feet of floor area and associated pedestrian gate; a new playground with a 6-foot-tall vine-covered plastered wall, shade structure, and storage cabinets; replacement of the existing outdoor amphitheater in the upper campus with a new seating area and shade structure; and a new 1,370-square-foot storage/

trash/recycling enclosure. The Project also proposes a Lot Line Adjustment (LLA) whereby a 0.56-acre parking lot and hillside area currently owned by Berkeley Hall School and Bel Air Presbyterian Church immediately adjacent to the southwestern most portion of the Project Site would be added to the Project Site, a portion of which would be developed with the proposed 1,370-square-foot storage/trash/recycling enclosure. The Project would retain the existing 46 vehicle parking spaces used by the School, which would meet LAMC requirements for the Project, and would increase on-site bicycle parking from 4 to 44 spaces. In all, the Project would: increase the size of the Project Site from 5.46 to 6.02 acres; add 22,508 square feet of new floor area to the School's existing 42,678 square feet of floor area, for a total of 65,186 square feet of floor area (with all floor area in residential floor area [RFA] as defined by LAMC Section 12.03); and increase the floor area ratio (FAR) at the Project Site from 0.18:1 to 0.25:1. Additionally, the applicant is proposing approximately 1.45 acres of grading, including approximately 7,400 cubic yards (cy) of cut and 5,200 cy of fill, resulting in a total of 12,600 cy of grading and 2,200 cy of soil export. A total of 19 trees are proposed for removal and 18 trees are expected to be impacted by construction.

An Alternative LLA Scenario is proposed in the event that the Bel Air Presbyterian Church portion of the proposed LLA cannot be acquired by the School whereby the LLA area would be reduced to 0.46-acres and a smaller storage/trash/recycling enclosure would be developed in the existing outdoor amphitheater portion of the School, with a smaller seating area and shade structure at that location. The storage portion of the proposed storage/trash/recycling enclosure would not be developed under this scenario.

The Project would result in an increase in school enrollment from 330 to 430 K–8 students and an increase in the number of school employees from 78 to 108 employees. Project construction would occur in a single phase, with construction anticipated to start in June 2022 and be completed in July/August 2023 (with full occupancy of the new facilities anticipated in 2025).

The requested Project entitlements include: (1) a Vesting Conditional Use Permit for the use and expansion of a private school (K–8) in the RE40 Zone, including revisions to conditions of approval under the current entitlement application ; (2) an Exception from the Mulholland Scenic Parkway Specific Plan to allow a reduced northerly front yard and westerly side yard; (3) a Project Permit Compliance and Design Review Approval pursuant to the Mulholland Scenic Parkway Specific Plan and LAMC; and (4) other discretionary and ministerial permits and approvals that may be deemed necessary. In addition, ministerial approval of the proposed LLA will be required, as well as a Haul Route Approval by the Board of Building and Safety Commissioners and tree removal approval by the Department of Public Works.

A table outlining the proposed development is included as Table 1. The proposed site plan is shown in Figure 4.

3.3.2 Project Components

Provided below is a description of each of the proposed Project components.

Improvements to Existing Buildings

This component of the Project would include interior and exterior renovations of the school's existing two-story approximately 30-foot-tall library building, including the reconfiguration of existing classroom spaces and a new first floor alcove and courtyard entrance that would result in the addition of one new

classroom and 2,619 square feet of new floor area for the library building. No increase to the existing

Table 1
Project Development Program Summary

	Existing	Proposed	Total
Total Floor Area ^a	42,678 sf	22,508 sf ^b	65,186 sf
K–8 Classrooms	25 rm (330 stu)	10 rm (100 stu)	35 rm (430 stu)
Administrative Space	4,379 sf	170 sf	4,549 sf
Security Pavilion	—	140 sf	140 sf
Shade Structures	1,250 sf	1,961 sf	3,211 sf
Playground Storage Cabinets	—	288 sf	288 sf
Storage/Trash/Recycling Enclosure	—	1,370 sf	1,370 sf
Project Site Area	5.46 ac	0.56 ac ^c	6.02 ac
Floor Area Ratio (FAR)	0.18:1	0.07:1	0.25:1
Vehicle Parking ^d	46 sp	46 sp	46 sp
Bicycle Parking ^e	4 s-t sp 0 l-t sp	36 s-t sp 4 l-t sp	40 s-t sp 4 l-t sp
Maximum Building Heights ^f	30 ft	30 ft	30 ft
Direct Disturbance Footprint	—	63,365 sf 1.45 ac	63,365 sf 1.45 ac

ac = acres

ft = feet

l-t sp = long term spaces

s-t sp = short-term spaces

rm = classrooms

sf = square feet

sp = spaces

stu = students

^a Residential floor area (RFA) as defined by LAMC Section 12.03.

^b The total proposed residential floor area of 22,508 sf includes: the Learning Center Building (16,130 sf), Library building addition (2,619 sf), security pavilion (140 sf), playground shade structure (1,111 sf), Upper School Classroom Building shade structure (850 sf), playground storage cabinets (288 sf), and storage/trash/recycling enclosure (1,370 sf).

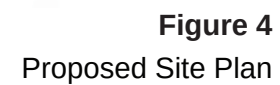
^c Includes proposed 0.56-acre (24,224-sf) LLA area adjacent to the upper campus.

^d Per Los Angeles Department of Building and Safety (LADBS) guidance, the school's required vehicle parking has been calculated at 1 space per K–8 classroom, plus 1 additional space for each 500 square feet of administrative floor area.

^e For private schools, LAMC Section 12.21 A.16(a)(2) requires 4 short-term bicycle parking spaces per classroom and 1 long-term bicycle parking space per 10 classrooms, to be applied to new development and additions that add new floor area.

^f The Project's security pavilion and playground improvements, which are located within 100 feet of Mulholland Drive, will not exceed the 15-foot maximum height limit imposed by the Specific Plan for this portion of the Site.

Source: Johnson Favaro June 18, 2021; Eyestone Environmental June 22, 2021.



library building's height would occur. In addition, one additional classroom would be added within the school's existing recently constructed one-story physical education building.

New Learning Center

A new two-story 30-foot-tall Learning Center and associated campus courtyard would be built at the southeastern edge of the campus as it abuts the existing hillside. The new building would include 16,130 square feet of floor area, including 8 classrooms and 170 square feet of administrative space. The building would continue the existing campus courtyard typology with the development of adjacent landscaped courtyards that would provide new campus social space for student lunch service, outdoor instructional area, and assembly and special events area in the heart of the campus.

New Security Pavilion and Associated Pedestrian Gate

A new 8-foot-tall security pavilion and associated 8.5-foot-tall pedestrian entry gate is proposed to be located at the main pedestrian entrance to campus along the northern property line, abutting the existing vehicular gate. This pavilion would contain 140 square feet of new floor area.

New Playground, Storage Cabinets, Wall and Shade Structure

A new playground with a 15-foot-tall shade structure is proposed. The playground is proposed at the site of an existing handball court and hopscotch court, immediately northwest of the existing basketball courts along the Project Site's northern property and behind a row of existing trees to remain. Shielding the playground from view from Mulholland Drive would be a 6-foot-high vine-covered plaster wall. On the playground side of the wall, not visible from Mulholland, would be 6-foot-tall, 30-inch-deep, non-occupiable athletics equipment storage cabinets extending for the length of the wall. Per guidance received from LADBS, these cabinets contain 288 square feet of floor area.

Seating Area and Shade Structure

The existing 2,328-square-foot concrete outdoor amphitheater located adjacent to the Upper School building in the southwest corner of the Project Site would be replaced with an at-grade seating area and 850-square-foot fabric shade structure with maximum height of 15 feet. The existing mechanical units located at grade in the amphitheater area would be mounted to the Upper School's classroom building wall and screened. Existing steps leading up to the amphitheater would be replaced with an ADA accessible ramp. Native plantings to restore the hillside would also be provided.

Lot Line Adjustment and Storage/Trash Enclosure

As indicated in Figure 5, the School proposes to acquire an area totaling 24,224 square feet (approximately 0.56 acre) along the southwestern portion of the current Site, consisting of 19,877 square feet of adjacent land currently owned by Berkeley Hall School to the south and 4,347 square feet of adjacent land currently owned by Bel Air Presbyterian Church to the west. In connection with this acquisition, an LLA would be ministerially reviewed and approved by the City to incorporate the acquired property into the Project Site. Following approval of the LLA, a 1,370-square-foot, 12-foot-high storage/trash/recycling/recycling enclosure would be developed within the formerly Church-owned portion of the LLA. The existing chain link gate crossing the School's fire lane would be replaced with an 8-foot-high black picket sliding gate and pedestrian gate. Additionally, west of the gates along the fire lane, a portion



Figure 5
Aerial View of Project Looking South

of the existing retaining wall and chain link fence would be replaced with a new wall set back from the property line which would be constructed of the same height and topped with a picket fence (top of fence 8 feet above grade). An 8-foot-tall ficus hedge is proposed in front of this wall and fence for added privacy.

In addition, an Alternative LLA Scenario is proposed in the event that the Bel Air Presbyterian Church-owned portion of the proposed LLA area cannot be acquired by the School. Under this alternative, Mirman School would acquire a smaller area of land, consisting of 19,887 square feet (approximately 0.46 acre instead of 0.56 acre) of property from Berkeley Hall School to the south, immediately adjacent to existing Mirman property. Following this acquisition and associated LLA, the Project Site would increase to a smaller total area of 257,723 square feet (5.92 acres rather than 6.02 acres). Under this scenario, a smaller waste/recycling building (245 square feet rather than 1,370 square feet) would be constructed in this newly added portion of the Project Site and would also be clad in precast concrete board form panels. Under this alternative, the School proposes to similarly demolish an existing 2,328-square-foot concrete outdoor amphitheater located adjacent to the Upper School building in the southwest corner of the Project Site and replace it with native plantings to restore the hillside; however, the School would develop a smaller shade structure (490 square feet) over a smaller seating area than proposed under the Project (850 square feet). The proposed site plan with a concept plan for the area of the Project Site covered by this Alternative LLA Scenario is included as Figure 6.

Additional Campus Improvements

In addition to the above improvements, the Project would include construction an underground stormwater capture and re-use tank beneath the new courtyard proposed south of the Learning Center.

In addition, multiple walls of varying heights, including building stair walls, planter walls, and retaining walls, are proposed throughout the School campus as indicated in Figure 7. All such walls would comply with the location and height requirements of the Specific Plan and the LAMC, with the exception of the 6-foot-tall playground masonry wall for which a Specific Plan Exception is being requested. This wall is described in the “New Playground, Storage Cabinets, Wall and Shade Structure” subsection above and evaluated in Checklist Section I, Aesthetics, of this MND.

3.3.3 Design and Architecture

The existing buildings on the Project Site adhere to the design principles established in the Mulholland Scenic Parkway Specific Plan, foremost of which is to maintain and enhance the unique natural character of the Santa Monica Mountains. The proposed improvements and new Learning Center would similarly adhere to these design principles. The character of the proposed improvements and new building would be contemporary but would be inspired by the tradition of simple utilitarian ranch buildings in the Santa Monica Mountains. The muted material palette of the proposed Learning Center and building additions has been chosen to best blend with the indigenous hillside landscape. The design also includes materials and details, such as exposed fire-treated wood framing, that would serve to connect the new buildings to the existing campus buildings while being fire resistant. The Learning Center would be situated in the visual shadow of the existing campus buildings as viewed from Mulholland Drive and would be built into the base of the hillside, thereby minimizing its visual mass and preserving the character of the existing campus.



Figure 6
Aerial View of Project Looking East



Figure 7
Proposed Landscape Plan

Regarding the proposed improvements in the existing outdoor amphitheater area (which is not visible from Mulholland), the at-grade seating area would be composed of decomposed granite with benches and tables, the existing mechanical units located at grade in the amphitheater to be mounted to the Upper School's Classroom Building wall would be screened with perforated metal panels painted to match the existing building wall, and the existing amphitheater retaining wall would be replaced with new retaining wall that include cast in place benches on both sides. Regarding the proposed storage/trash/recycling enclosure, it would be clad in precast concrete board form panels covered in vine planting and wood look aluminum battens to match the battens on the south elevation of the proposed Learning Center building.

Aerial views of the Project looking south and east are provided in Figure 8 and Figure 9.

3.3.4 Open Space and Landscaping

As indicated in Figure 10, the Project would include new landscaping and trees. Project Site development and landscaping would adhere to the design principles established in the Mulholland Scenic Parkway Specific Plan, foremost of which would be to maintain and enhance the unique natural character of the Santa Monica Mountains. The landscaping of the new courtyards would blend with the indigenous hillside vegetation, as well as with the existing campus open space. Indigenous, drought tolerant native planting would be balanced on campus with grass lawns that are necessary for physical education and athletics. Approximately one-half of the Project Site would remain as landscaped and open space.

As discussed in the Arborist Report prepared for the Project (see Appendix 4), 78 trees were inventoried in association with the proposed Project. The Arborist Report inventories the following eight protected trees/shrubs: one native California sycamore tree on the Project Site, 1 native Mexican Elderberry on the Project site, one California sycamore tree in the right-of-way, 2 coast live oaks overhanging from adjacent sites, 2 coast live oaks on adjacent sites, and one Mexican Elderberry on an adjacent site. According to the Arborist Report, none of these eight protected trees/shrubs will be removed or impacted by construction. The Project would encroach on nine sycamore trees, which the applicant states were planted in 2015- 2016 as part of the school's recent campus improvements. The Urban Forestry Division will review the applicant's evidence and tree report and determine if these trees are native to the project site, and apply any required replacement. The remaining 45 trees inventoried in the Arborists Report are mature, non-protected trees. According to the Arborist Report, of the remaining 16 sycamore trees, none are proposed for removal. Additionally, construction will not encroach upon these 16 sycamore trees.

According to the Arborist Report, a total of 19 trees will be removed, and 18 trees will be impacted by construction. In addition, one existing non-protected tree (shamel ash) to be removed along the Project Site's northern boundary could potentially be determined to be a City street tree; should that determination be made, this tree would be removed and replaced on a 4:1 or greater basis pursuant to the regulations of the City's Urban Forestry Division and following approval by the City's Board of Public Works.

Finally, the Arborist Report discusses additional protected trees in the public right-of-way. These trees are identified as being outside of the construction area.

3.3.5 Access, Circulation, and Parking

Existing access and circulation to the campus would remain unchanged under the Project. Vehicular and emergency would continue to be provided from the existing school driveways off of Mulholland Drive,

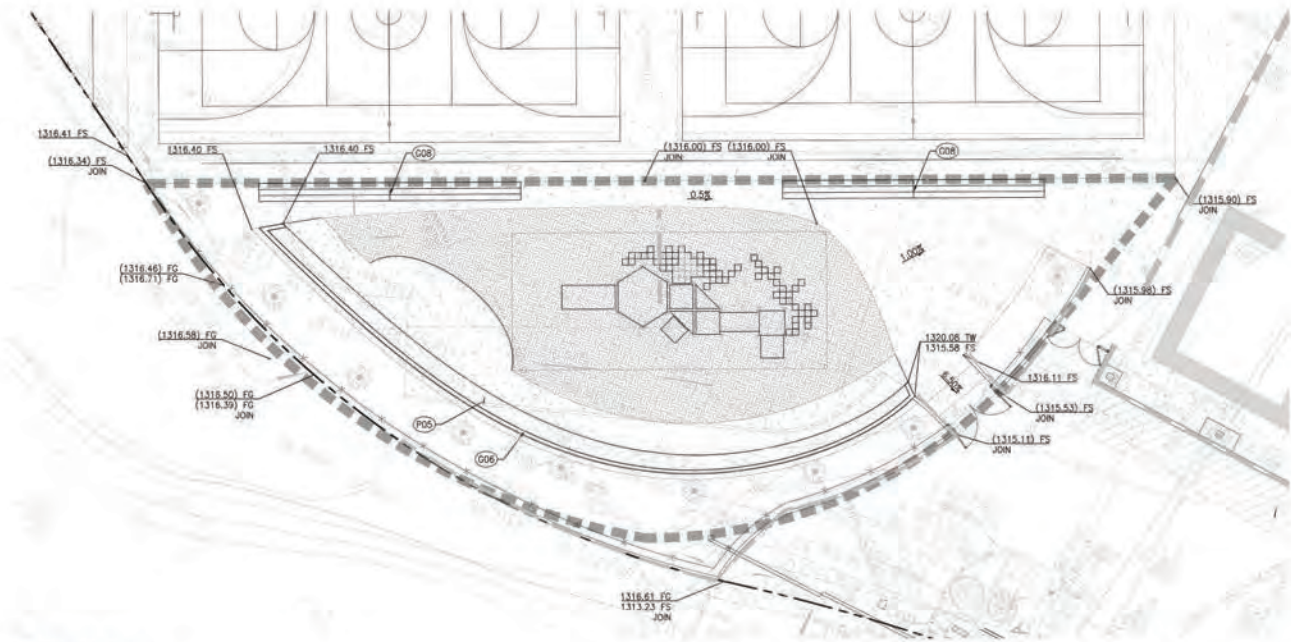
while secondary emergency access would continue to be provided by an existing fire lane connecting Mirman School to the Berkeley Hall School driveway to the south. Pedestrian access to the school would continue to be from the Project Site's Mulholland Drive frontage. Mulholland Drive in the vicinity of the Project Site is a two-lane roadway improved to a 100-foot width within a dedicated 200-foot right-of-way.

Following completion of the Project, the school would include 35 classrooms (each of which would require 1 parking space), as well as 4,549 square feet of administrative and office space (which pursuant to LADBS guidance, would require 1 parking space for each 500 square feet of floor area). Accordingly, the school's parking requirement following completion of the Project would be 44 parking spaces. The school currently provides 46 on-site parking spaces within a parking area located adjacent to Mulholland Drive. Following completion of the Project, all required parking would continue to be accommodated within the school's existing parking area.

For private schools, LAMC Section 12.21 A.16(a)(2) requires 4 short-term bicycle parking spaces per classroom, and 1 long-term bicycle parking space per 10 classrooms, to be applied to new development



Figure 8
Proposed Grading Plan



PLAYGROUND AREA



MAIN GATE ENTRY AND PROPOSED TRANSFORMER PAD AREA

Figure 9
Playground Grading Plan

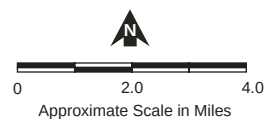
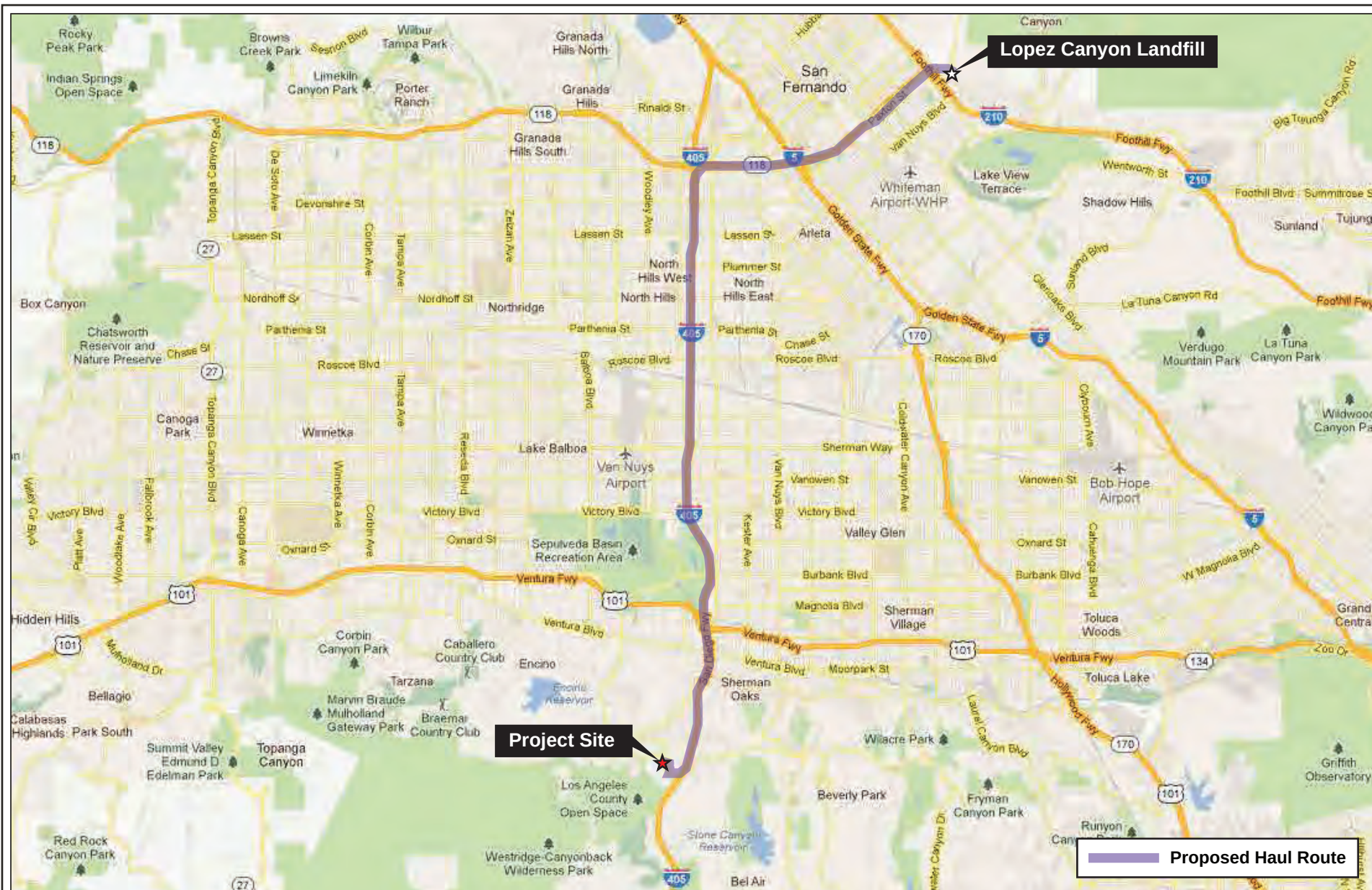


Figure 10
Proposed Haul Route Traveling North

and additions that add new floor area. The Project would include the construction of 10 new classrooms which would require 40 short-term bicycle parking spaces and 4 long-term bicycle parking spaces. The School will provide these required bicycle parking spaces.

3.3.6 Lighting and Signage

Proposed building and site lighting on campus would be limited to shielded, low level lighting for campus security and pedestrian safety. All lighting would comply with current energy standards and codes, as well as design requirements, while providing appropriate light levels. Project lighting would be designed to provide efficient and effective on-site lighting while minimizing light trespass from the Project Site, reducing sky-glow, and improving nighttime visibility through glare reduction. Specifically, all on-site exterior lighting would be automatically controlled via photo sensors to illuminate only when required and would be shielded or directed toward areas to be illuminated to limit spill-over. Where appropriate, interior lighting would be equipped with occupancy sensors and/or timers that would automatically extinguish lights when no one is present. All exterior and interior lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent lighting technology.

The only additional sign proposed is a small campus identification sign next to the proposed security pavilion.

3.3.7 Sustainability Features

The Project would represent sustainable development in that it would be developed on an already developed site that is surrounded by urban development within an urbanized area rather than represent the expansion of development into an undeveloped area. In addition, the Project has been designed, and would be constructed, to incorporate environmentally sustainable building features and construction protocols required by California Title 24, the Los Angeles Green Building Code and CalGREEN. Additionally, it is expected that the transport of Project construction materials would be in compliance with the applicable regulatory requirements regarding energy usage such as Federal Corporate Average Fuel Economy (CAFE) standards. These features and protocols would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. "Green" principles are also incorporated throughout the Project to comply with the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features. Specifically, the Project would incorporate the following features in the new/renovated floor area and new landscape areas to support and promote environmental sustainability: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; heat island reduction; optimized energy performance; rainwater management (e.g., capture and reuse of a portion of the rainwater that falls on the Project Site); water-efficient landscaping; and the storage and collection of recyclables. The Project would also incorporate LEED conservation measures during construction, such as the use of recycling construction materials, building life-cycle impact reduction, and building product optimization, through the implementation of a Construction and Demolition Waste management Plan. In addition, Mirman School has 13 existing parking spaces capable of supporting future electric vehicle (EV) supply equipment (EVSE) and three parking spaces equipped with EV charging stations and/or outlets for plugin, and these parking spaces would be retained under the Project. Mirman School also has four short-term bicycle parking spaces and is proposing 36 additional

short-term and four new long-term bicycle parking spaces (e.g., 4 existing, 40 proposed, and 44 total) which would meet LAMC bicycle parking requirements for the Project.

3.3.8 School Operations

The School currently operates in compliance with the conditions of approval of Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A, which address School enrollment, hours of operation, parking, special events, community relations, lighting, and noise, among other topics. In connection with the Project, the School is requesting that its permitted enrollment be increased from 330 students to 430 students. In addition, the School is proposing to slightly extend its daily classroom instruction hours, which are currently 8:00 A.M. to 3:15 P.M., Monday through Friday, by 15 additional minutes (until 3:30 P.M.) in order to facilitate staggered afternoon departure for students. Otherwise, the School proposes to continue operations in the same manner as today and is not proposing other substantive changes to its existing conditions of approval.

3.3.9 Construction Activities

As discussed previously, Project construction would occur in a single phase, with construction anticipated to start in mid-2022 and be completed in late 2023, and with the full increase in enrollment expected to be achieved in 2025. Construction activities would include demolition of existing uses, grading and excavation, and construction of new structures and related infrastructure. Grading and excavation for Project development would primarily be associated with construction of the proposed Learning Center. The proposed grading plan is shown in Figure 11 and 12. Excavation would reach a maximum depth of approximately 15 feet below the ground surface (bgs), with cylindrical drilling of up to 20 feet bgs for caissons required for the Learning Center foundation. There would be approximately 1.45 acres of grading, including approximately 7,400 cubic yards (cy) of cut and 5,200 cy of fill, resulting in a total of 12,600 cy of grading and 2,200 cy of soil export. As discussed in Section XI, Land Use, of this MND, the Project's proposed grading quantities would be in compliance with the LAMC and the City's Baseline Hillside Ordinance ("BHO"); however, because the Project would result in the export of more than 1,000 cubic yards of earth materials from a designated Hillside area, approval of a haul route by the Board of Building and Safety Commissioners will be required.

Haul trucks would travel to and from the Project Site via a designated haul route. Specifically, haul trucks would access the Project Site via the I-405, as shown in Figure 13 and 14. Haul trucks arriving and leaving the Project Site would travel via Mulholland Drive to either the I-405 north to State Route 118 east to the Lopez Canyon Landfill, or I-405 Freeway south to I-10 east to the Puente Hills Landfill.

The direct disturbance footprint for the Project is shown in Figure 15 and would be 63,365 square feet (1.45 acres). The maximum depth of grading and excavation activities would be 13 feet bgs for the Learning Center, 15 feet bgs for a proposed stormwater tank, and cylindrical drilling of up to 20 feet bgs for caissons required for the Learning Center foundation.

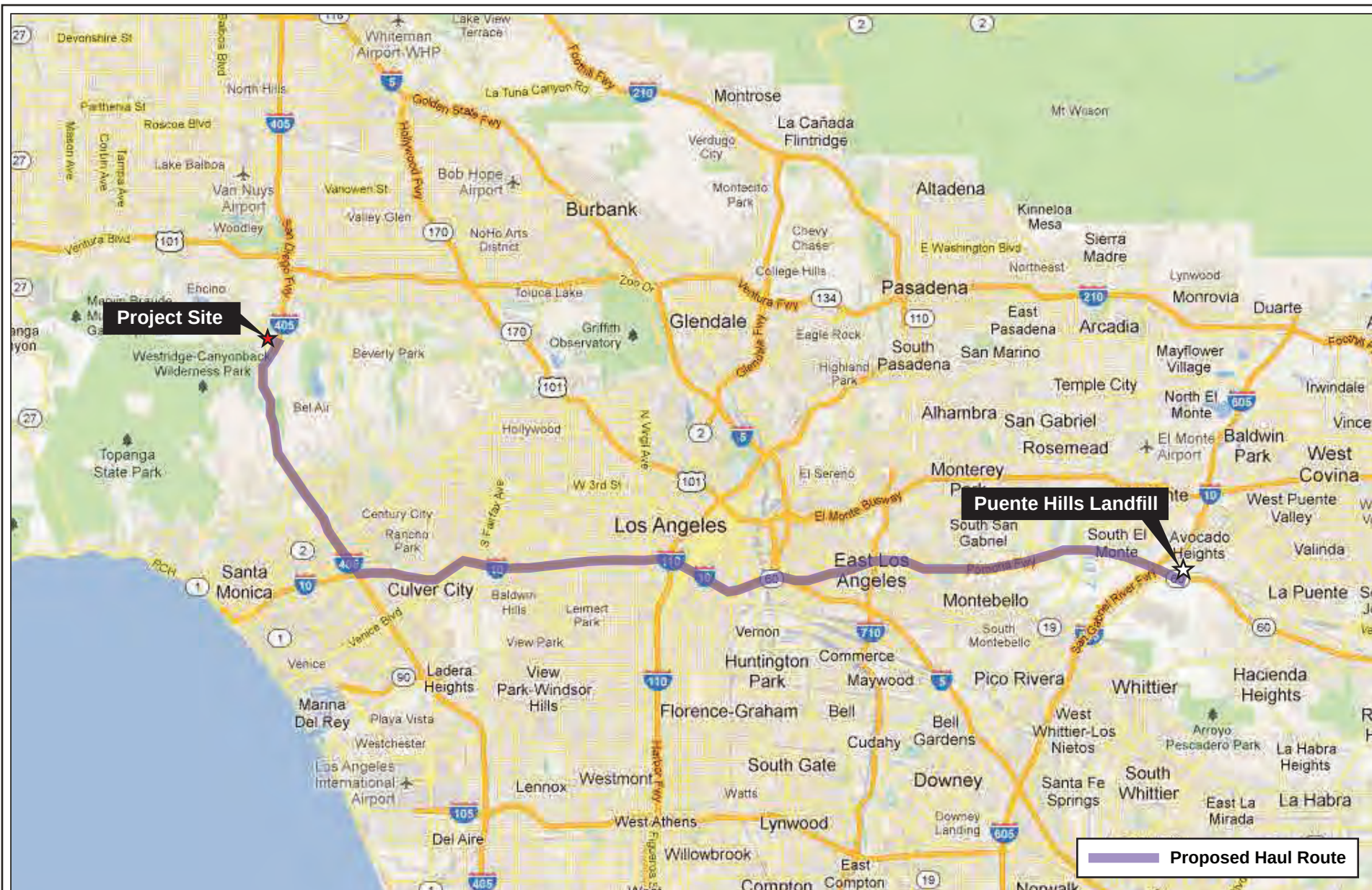


Figure 11
Proposed Haul Route Traveling South

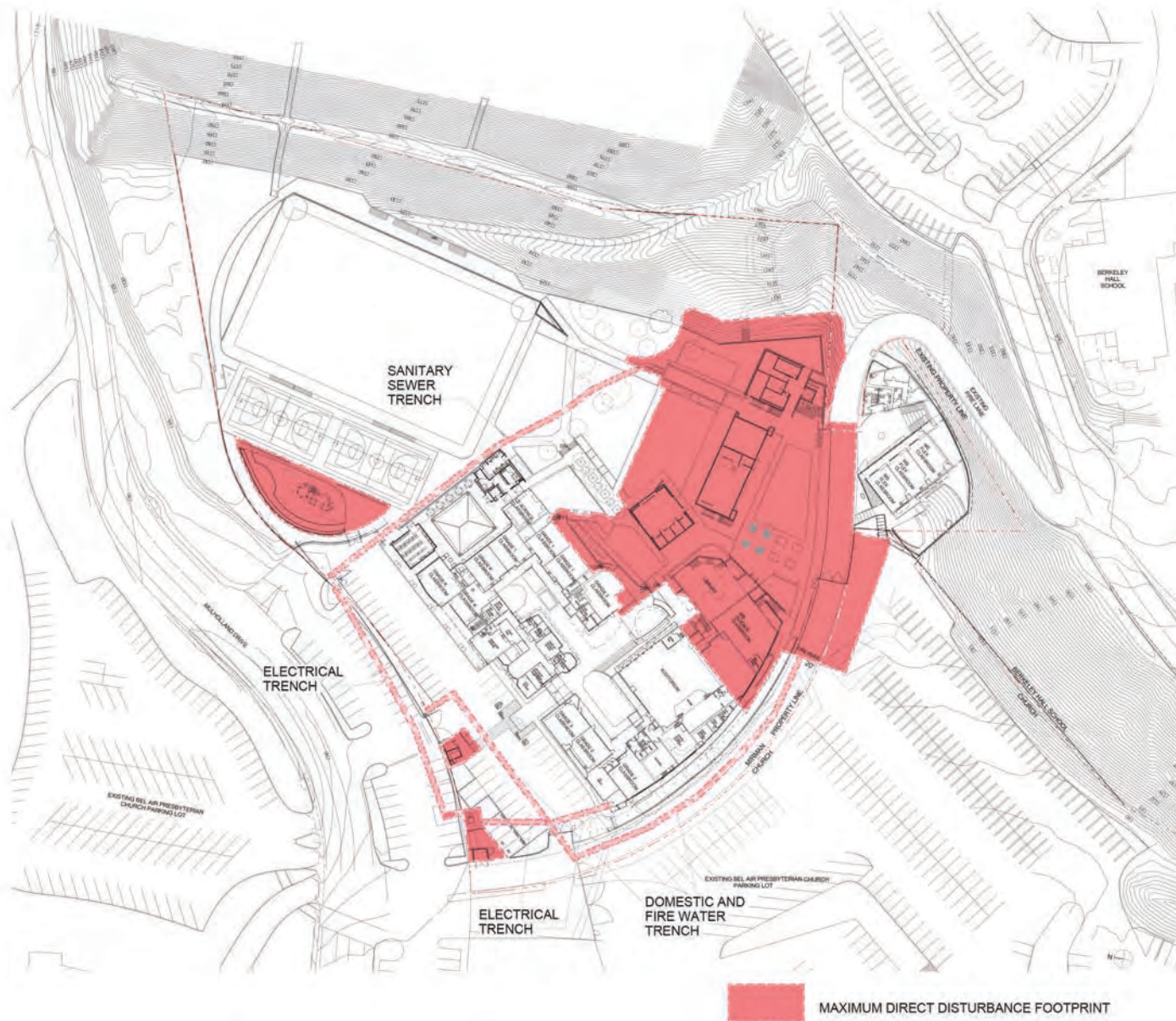


Figure 12
Maximum Direct Disturbance Footprint



Viewpoint 1: Looking southeast from just west of Mirman School



Viewpoint 2: Looking south from across Mirman School



Viewpoint 3: Looking southwest from just east of Mirman School

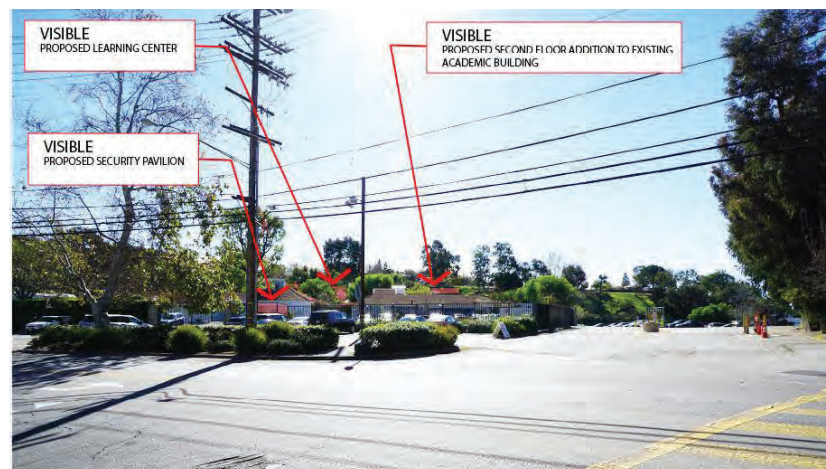
Figure 13
Existing Views of the Project Site from Mulholland Drive



View 1



View 2



View 3

Figure 15
Views of the Proposed Project
from Mulholland Drive – Views 1-3

3.4 REQUESTED PERMITS AND APPROVALS

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

- **Vesting Conditional Use Permit** pursuant to LAMC Sections 12.24 T and U.6, and as required pursuant to Condition No. 12 of case number CPC-2010-3300-CU-ZAA-DRB-SPP-1A, to permit the continued operation of a private elementary and middle school in the RE40-1-H zone, with the addition of 22,508 square feet of residential floor area, 10 classrooms, security pavilion, playground, student seating area, shade structures, and storage/trash/recycling building, and an increase in enrollment to 430 students;
- **Exception from the Mulholland Scenic Parkway Specific Plan** pursuant to LAMC Section 11.5.7 F to allow:
 - A proposed 8-foot-high, 140-square-foot security pavilion and 8.5-foot-high pedestrian entry gate to be located within the Specific Plan's required 40-foot front yard setback;
 - A proposed 15-foot-high playground shade structure, 6-foot-high playground wall, playground storage cabinets, and associated playground equipment to be located within the Specific Plan's required 40-foot front yard setback; and
 - A proposed 12-foot-high, 1,370 sf storage/trash/recycling building to be located within the Specific Plan's required 20-foot westerly side yard setback.
- **Project Permit Compliance and Design Review Approval** pursuant to the Mulholland Scenic Parkway Specific Plan and LAMC Sections 11.5.7 C and 16.50 for the development of the Project's proposed improvements, as well as the continued use and operation of the School's parking lot within the Specific Plan's required 40-foot front yard setback.
- **Haul Route Approval** by the Board of Building and Safety Commissioners pursuant to LAMC Section 91.7006.7 of a haul route to allow export of more than 1,000 cubic yards of earth materials from a hillside area.
- **Tree Removal Permit by the Department of Public Works for the removal of any street trees or protected trees.**
- In addition to the above discretionary requests, the Project will require ministerial approval of an LLA to adjust the Site's boundaries and incorporate the Acquisition Property.
- **Other discretionary and ministerial permits** and approvals that may be deemed necessary, including, but not limited to, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

3.5 RESPONSIBLE PUBLIC AGENCIES

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

4 ENVIRONMENTAL IMPACT ANALYSIS

The following evaluates the potential environmental impacts of the Project.

I. AESTHETICS

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

The analysis below is based, in part, on photographic simulations and on a viewshed analysis included as Appendix 1 of this MND.

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

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

The 5.46-acre Project Site (6.02 acres following the proposed LLA) is located on the south side of Mulholland Drive, approximately 0.5 mile west of the San Diego Freeway in the Santa Monica Mountains. The Project Site includes a flat terrace area where the existing Mirman School facilities are located, and undeveloped hillsides in the south and east. The Project Site is currently developed with approximately 42,678 square feet of school-related floor area within eight buildings, including within three primary academic buildings ranging in height from one to two stories (15 to 30 feet), several smaller structures, playfields and surface parking.

As discussed in Section 3, Project Description, of this MND, the Project Site is located within the City's Mulholland Scenic Parkway Specific Plan (Specific Plan) Area. An undeveloped ridge (at least undeveloped on the north and west sides facing the Project Site), designated as a Prominent Ridge by the Specific Plan, is located immediately east and south of the Project Site. This ridge provides a physical and visual barrier between the Project Site and both the San Diego Freeway to the east and the Berkeley Hall School and Los Angeles Basin to the south. Another ridge is located north of the Project Site, on the north side of Mulholland Drive, which looks out over the San Fernando Valley to the north. Bel Air Presbyterian Church and an associated parking lot are developed on the ridge. Hence, the Project Site is located within a topographic depression surrounded to the north, south and east by ridges, with views of the Project Site available from only some locations along Mulholland Drive, the Bel Air Presbyterian Church, Westland School, and a residential subdivision approximately 800 feet to the west (across the Westland School property and open space).

The Specific Plan identifies Mulholland Drive as a scenic corridor recognized for its scenic features and recreational value.¹ Specific visual resources within the Specific Plan Area include undeveloped ridges, shrubs, trees and rock outcrops, with scenic vistas visible from some locations along Mulholland Drive and the adjacent properties.² More specifically, the Specific Plan identifies the Project Site as being located within the Mandeville Canyon to Sepulveda Boulevard (Map 6) and San Diego Freeway Area (Map 7) segments of the Specific Plan Area, and within the Inner Corridor and Institutional Use Corridor of the Mulholland Specific Plan.³ Per Section 5.A.2 of the Specific Plan, the Inner Corridor Overlay Zone permits school uses within the Institutional Use Corridor at the discretion of the appropriate decision-maker when the following findings can be made:⁴

- i. The use does not destroy or obstruct a scenic feature or resource, or view from Mulholland Drive.
- ii. The use preserves the residential character along the right-of-way.
- iii. The use is compatible with the scenic parkway environment.
- iv. The use preserves and/or enhances land having exceptional recreational and/or educational value.
- v. Any grading is minimized.
- vi. Any graded slopes have a natural appearance compatible with the characteristics of the Santa Monica Mountains.
- vii. The use preserves the natural topography, prevents erosion and protects native vegetation.
- viii. The use preserves the ecological balance.

¹ City of Los Angeles, Mulholland Scenic Parkway Specific Plan—Maps 6 and 7, adopted May 13, 1992.

² City of Los Angeles, Mulholland Scenic Parkway Specific Plan, adopted May 13, 1992.

³ City of Los Angeles, Mulholland Scenic Parkway Specific Plan—Maps 6 and 7, adopted May 13, 1992.

⁴ City of Los Angeles, Mulholland Scenic Parkway Specific Plan, adopted May 13, 1992.

- ix. The use protects the prominent ridges, streams and environmentally sensitive areas, and the aquatic, biologic and topographic features therein.
- x. The use protects identified archaeological and paleontological sites.
- xi. The use minimizes driveway and private street access into the right-of-way.
- xii. The use minimizes the visual intrusion of lighting into the right-of-way.

In approving a discretionary use pursuant to Section 11, the decision-maker may impose conditions to protect the public interest, to assure a project is compatible with adjacent uses, and to secure an appropriate project in harmony with the objectives of this Specific Plan.

As indicated in Figure 16, the Project Site is visible to varying degrees from Mulholland Drive depending on location, with: (1) the school's parking lot along the south side of Mulholland Drive visible along the western half of the property's Mulholland Drive frontage; (2) the east and west academic buildings visible from just west of the Project Site; (3) the school buildings largely obscured from view by trees and an on-site wall and hedge for a portion of the school's Mulholland Drive frontage; and (4) only the school fence visible from just east of the Project Site where Mulholland Drive dips below the surface elevation of the Project Site as no existing structures currently exist in the west portion of the Project Site (e.g., currently occupied by a school playfield, handball court and play area).

The Project would include the development of a new 16,130 two-story (30-foot-tall) Learning Center building, a 2,619-square-foot expansion of the existing Library building, a new 140-square-foot entry pavilion and associated pedestrian entry gate, a new playground with a 15-foot-tall shade structure and 6-foot plastered vine-covered wall screening playground storage cabinets, a 1,370-square-foot storage/trash/recycling enclosure, and a new seating area with 15-foot-tall shade structure, which together would increase the existing floor area of the school from 42,678 to 65,186 square feet (a net increase of 22,508 square feet) and increase the FAR from 0.18:1 to 0.25:1. This development and resulting FAR would be fully consistent with the Brentwood–Pacific Palisades Community Plan's Minimum Residential land use designation and RE40-1-H (Residential Estate, Height District 1, Hillside Area) zoning of the Project Site, which permit private school uses with a CUP subject to discretionary review and approval when findings as required by LAMC Section 12.24 can be made. Project development would also be consistent with the Mulholland Scenic Parkway Specific Plan's Inner Corridor Overlay Zone and Institutional Use Corridor which permit school uses subject to discretionary review and approval. Furthermore, the Project would not include development on the designated Prominent Ridgeline located immediately south and east of the Project Site. Most importantly, no scenic vistas from Mulholland Drive, or from private vantage points, including Bel Air Presbyterian Church, Westland School, and the residential subdivision located approximately 800 feet to the west, would be affected. Specifically, even if views of the designated Prominent Ridge from Mulholland Drive are considered a scenic vista:



View 4



View 5



View 6

Figure 16
Views of the Proposed Project
from Mulholland Drive – Views 4-6

1. As indicated in Figure 17 through 21, the ridgeline is currently barely visible from the segment of Mulholland Drive along the Project Site because of the existing intervening trees, and where the ridgeline is visible from Mulholland Drive (see specifically Views 2 and 3 in Figure 16 and Views 10 and 11 in Figure 19), the proposed improvements would not extend above the top of the ridgeline as seen from Mulholland Drive;
2. As shown in the viewshed analysis prepared pursuant to the Specific Plan (Appendix 1 of this MND), the southernmost parapet of the Project's proposed Learning Center would only very slightly penetrate the viewshed, resulting in only minimal visual effects as seen from Mulholland Drive, and would not significantly alter or obscure the existing visual field or views. Similarly, the Project's proposed playground shade canopy would only slightly penetrate the existing viewshed and would not alter or obscure the existing visual field or views of the off-site Prominent Ridge located to the south and east of the Site. Neither the proposed security pavilion nor the Library Building addition would penetrate the viewshed. Furthermore, none of the improvements proposed within the Upper Campus and LLA area (i.e., the storage/trash/recycling enclosure, seating area and shade structure under the Project, and the smaller storage/trash/recycling enclosure, seating area and shade structure under the Alternative LLA Scenario) would be visible from or penetrate the viewshed of Mulholland Drive.
3. The entire ridgeline behind the school would continue to be visible from the surrounding land uses (i.e., the Westland School and residential subdivision to the west, Bel Air Presbyterian Church to the north, etc.).

Lastly, it is noted that a "scenic vista" is a panoramic view of a valued visual resource, and as previously indicated, there are no panoramic views of the ridgeline from the segment of Mulholland Drive along the Project Site (just extremely narrow and passing views between existing buildings and trees).

The Specific Plan also identifies vista points, which provide expansive views from Mulholland Drive to the surrounding terrain and valleys below Mulholland Drive, and trails. The closest vista point to the Project Site is The Grove Overlook Major Vista Point, located north of the Bel Air Presbyterian Church parking lot approximately 200 feet north of the Project Site. Views from the vista point are oriented toward the expansive urbanized San Fernando Valley to the north of the Santa Monica Mountains rather than southwestward across the Project Site. Because the Project Site is located south of this Major Vista Point, rather than between this viewpoint and the San Fernando Valley, the Project would not adversely affect the scenic vista of the valley available from The Grove Overlook.

Based on the above, with the mitigations included herein, the Project would not have a substantial adverse effect on a scenic vista, and the impact to scenic vistas would be less than significant.



View 7



View 8



View 9

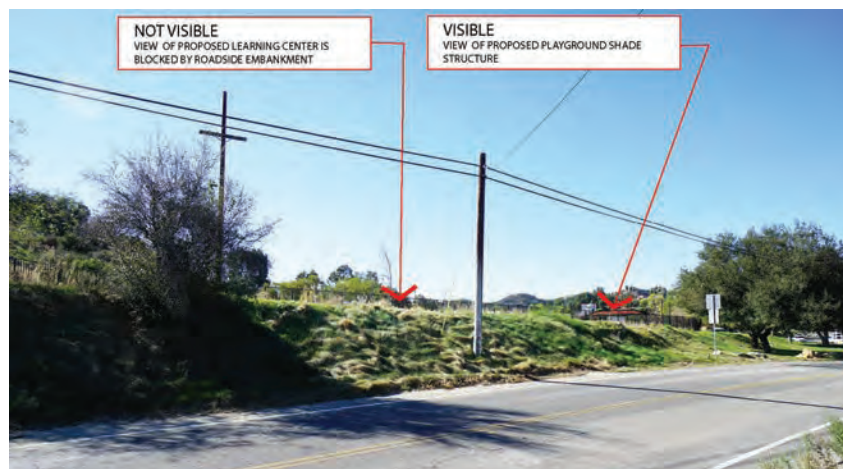
Figure 17
Views of the Proposed Project
from Mulholland Drive – Views 7-9



View 10



View 11



View 12

Figure 18
Views of the Proposed Project
from Mulholland Drive – Views 10-12



View 4



View 5



View 6

Figure 19
Views of the Project from Mulholland Drive
Views 4–6

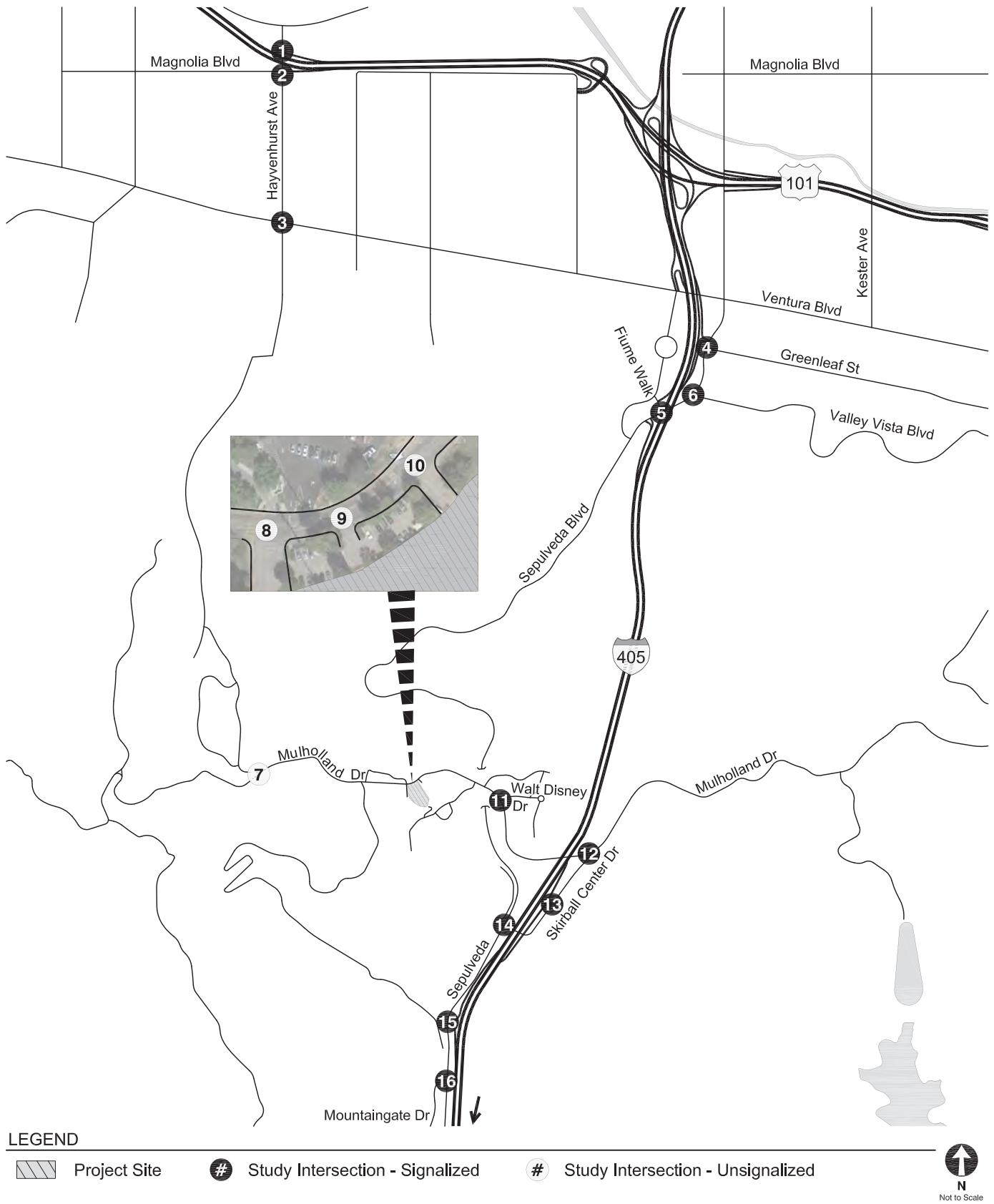


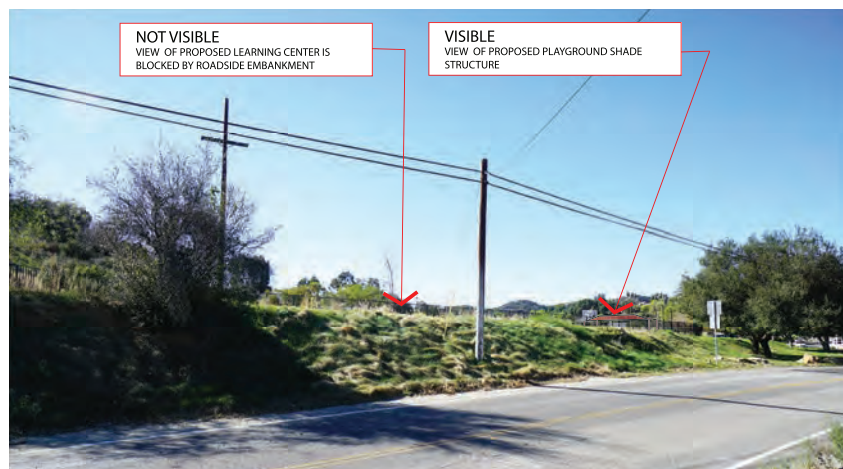
Figure 20
Study Area and Study Intersections



View 10



View 11



View 12

Figure 21
Views of the Project from Mulholland Drive
Views 10–12

Mitigation Measure AES-1: Landscape Plan. Environmental impacts to the character and aesthetics of the neighborhood may result from project implementation. However, the potential impacts will be mitigated to a less than significant impact with the following measure:

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

Mitigation Measure AES-2: Hillside Site Design. Environmental impacts, such as the alteration of existing or natural terrain may result from project implementation. However, these impacts will be mitigated to a less than significant level by the following measures:

- Grading shall be kept to a minimum.
- Natural features, such as prominent knolls or ridge lines, shall be preserved.

Mitigation Measure AES-3: New retaining walls that can be viewed from the adjacent public right(s)-of-way shall incorporate one or more of the following to minimize their visibility: clinging vines, espaliered plants, or other vegetative screening; decorative masonry, or other varied and textured façade; or utilize a combination of methods. The method of compliance with this measure shall be noted on any required landscape plan.

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

Less Than Significant with Mitigation. The Project Site is not located along a state scenic highway—the nearest officially eligible State scenic highway is a segment of U.S. Route 101 (US-101) located approximately 12 miles northwest of the Project Site.⁵ However, the City's Mobility Plan 2035 identifies Mulholland Drive in the vicinity of the Project Site as a City-designated scenic highway.⁶ According to the Mobility Plan, the "scenic feature" for the Mulholland Drive Scenic Highway is its panoramic views and "ribbon of park." The Mobility Plan also states that Mulholland Drive is located within the Mulholland Scenic Parkway Specific Plan Area, as discussed above, which imposes design and development regulations. However, even if the City's designation of Mulholland Drive as a City-designated scenic highway is assumed to be on par with a state-designated scenic highway, the Project Site does not contain rock outcroppings or historic buildings visible from it (see response to Checklist Question V.a below for further discussion of historic resources). Also, the proposed new Learning Center, Library expansion, storage/trash/recycling enclosure, and seating area with shade structure would be set back from Mulholland Drive and separated from Mulholland Drive by the existing school parking lot, a hedge, and the existing school buildings such that only small portions of these proposed improvements would be visible from Mulholland Drive if visible at all as indicated in Figure 17 through 21. Furthermore, the existing trees and landscaping along the Project Site's Mulholland Drive frontage, as well as the existing street trees along this frontage within the Mulholland Drive right-of-way, would be retained, with the exception of

⁵ California Scenic Highway Mapping System, Los Angeles County, www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed January 2, 2019.

⁶ City of Los Angeles Mobility Plan 2035, Map A3, adopted September 7, 2016.

one potential street tree which would be replaced. Also, no existing trees would be removed for the playground which is already occupied by a handball court and play area, and as indicated in Figure 17 through Figure 21 and Appendix A, the existing narrow views of the ridgetops south and east of the Project Site through the trees would continue to be visible from Mulholland Drive over these proposed improvements. Hence, with mitigation, the Project would not substantially damage scenic resources, including rock outcroppings, historic buildings and natural ridges within a state scenic highway.

As discussed in the Arborist Report prepared for the Project (see Appendix 4), 78 trees were inventoried in association with the proposed Project. The Arborist Report inventories the following eight protected trees/shrubs: one native California sycamore tree on the Project Site, 1 native Mexican Elderberry on the Project site, one California sycamore tree in the right-of-way, 2 coast live oaks overhanging from adjacent sites, 2 coast live oaks on adjacent sites, and one Mexican Elderberry on an adjacent site. According to the Arborist Report, none of these eight protected trees/shrubs will be removed or impacted by construction. The Project will encroach upon nine sycamore trees, which the applicant states were planted in 2015- 2016 as part of the school's recent campus improvements. The Urban Forestry Division will review the applicant's evidence and tree report and determine if these trees are native to the project site, and apply any tree replacement requirements. The remaining 45 trees inventoried in the Arborists Report are mature, non-protected trees.

According to the Arborist Report, a total of 19 trees will be removed, and 18 trees will be impacted by construction. In addition, one existing non-protected tree (50 foot tall shamel ash, tree #2765) to be removed along the Project Site's northern boundary could potentially be determined to be a City street tree; should that determination be made, this tree would be removed and replaced on a 4:1 or greater basis pursuant to the regulations of the City's Urban Forestry Division and following approval by the City's Board of Public Works.

Finally, the Arborist Report discusses additional protected trees in the public right-of-way. These trees are identified as being outside of the construction area.

Furthermore, the Scenic Highways Guidelines of the City's Mobility Plan 2035 includes the following guideline (3c) relevant to specimens of existing trees located anywhere within the right-of-way of a City-designated scenic highway:

3C. Outstanding specimens of existing trees and plants located within the public right-of-way of a Scenic Highway shall be retained to the maximum extent feasible within the same public right-of-way.

Section IV, Biological Resources, includes mitigation measures for tree protection as recommended by the Arborist Report prepared for the Project.⁷ With mitigation, the Project would not substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway.

Mitigation Measures AES-1, AES-2, AES-3

⁷ Kay J. Greeley, Registered Landscape Architect, Arborist Report for The Mirman School for Gifted Children, updated July 14, 2021.

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

Less Than Significant with Mitigation. The Project Site is located in an urbanized area.⁸ As such this analysis focuses on whether the Project would conflict with applicable zoning and other regulations governing scenic quality.

A number of existing City land use plans applicable to the Project Site include regulations governing scenic quality, including the Los Angeles Municipal Code (zoning), Citywide General Plan Framework Element, Brentwood–Pacific Palisades Community Plan, Mulholland Scenic Parkway Specific Plan, and the Citywide Urban Design Guidelines. These plans, and the Project's consistency with the applicable scenic quality-related goals, objectives, and policies of these plans, is discussed below.

Zoning

As discussed in Section 3, Project Description, of this MND, the Project Site is zoned by the Los Angeles Municipal Code (LAMC) as RE40-1-H (Residential Estate, Height District 1, Hillside Area). In accordance with discretionary review as regulated by the LAMC, educational uses are permitted under the RE zone with a Conditional Use Permit (CUP) when specific findings can be made pursuant to LAMC Section 12.24. Mirman School has operated at the Project Site since approximately 1971 pursuant to multiple previously approved Conditional Use Permits (CUPs) and related entitlements (primarily, case numbers ZA-19543, ZA-92-0858-CUZ-YV, and CPC-2010-3300-CU-ZAA-DRB-SPP-1A) which established specific conditions for the Project Site. Approval of Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A authorized the school's most recent expansion of its existing operations, including the construction of an athletic field and ancillary uses east of the main school buildings. Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A also incorporated and updated the conditions of approval from the school's prior entitlements, and therefore currently serves as the governing entitlement approval for the school.

As described in detail in Section 3, Project Description, of this MND, the Project proposes improvements to the school's existing library building, including 2,619 square feet of new floor area and the conversion of existing space to a new classroom; the addition of a new classroom in the school's existing physical education building; a new two-story, 16,130-square-foot Learning Center building with eight new classrooms; a new security pavilion with 140 square feet of new floor area and associated pedestrian gate; a new 1,370-square-foot storage/trash/recycling enclosure, a new seating area with 15-foot-tall shade structure, and a new playground with a 15-foot-tall shade structure and 6-foot vine-covered plastered wall. As part of the Project, the School is proposing to increase its permitted enrollment from 330 students to 430 students.

In connection with the Project's proposed development activities and increased enrollment, the school has requested approval of a new vesting CUP pursuant to LAMC Sections 12.24 T and U.6. This new CUP would replace the School's existing CUP approval under Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-

⁸ Pursuant to Public Resources Code Section 21071, an "urbanized area" can be defined as an incorporated city that has a population of at least 100,000 persons. The Project Site is located within the City of Los Angeles, which is an incorporated city with a population well over 100,000 persons.

1A and provide the governing set of conditions of approval for the school following implementation of the Project. In addition, the Project has requested a Specific Plan Exception to permit a reduced northerly front yard setback (to accommodate the development of the proposed security pavilion and playground improvements) and westerly side yard setback (to accommodate the development of the storage/trash/recycling enclosure) in lieu of the setback dimensions otherwise required by the Specific Plan. These requested deviations would facilitate the development of the proposed Project largely within the existing relatively flat development footprint of the school rather than within the undeveloped hillside portions of the Project Site (which would result in additional grading, excavation, and resulting topographical changes). Furthermore, the Project's proposed improvements within 100 feet of Mulholland (security pavilion and pedestrian gate, and playground wall, storage cabinets and shade structure) would not exceed 15 feet in height, and those improvements located more than 100 feet from Mulholland (Learning Center, library addition, seating area shade structure, and storage/trash/recycling enclosure) would not exceed 30 feet in height, in compliance with the Specific Plan. Furthermore, as indicated in Figure 17 through Figure 21, the proposed improvements would be setback from Mulholland Drive and separated from Mulholland Drive by one to two rows of existing trees, with the majority of the proposed improvements (Learning Center, library addition, storage/trash/recycling enclosure, etc.) also largely obstructed from view from Mulholland Drive by an existing on-site fence and existing school buildings. Furthermore, the proposed playground and associated shade structure would be partially to fully obstructed from view from Mulholland Drive by the proposed 6-foot-tall vine-covered plastered wall which itself would be set back from Mulholland Drive and separated from Mulholland Drive by the two rows of existing trees. In addition, the improvements have been designed to be compatible in scale, height, and architecture with the existing school facilities and surrounding uses. Lastly, as indicated previously, over half of the Project Site would remain with landscaping and open space under the Project. Overall, the Project Site would continue to operate as an educational use consistent with its historic entitlement approvals, the Specific Plan, and other applicable zoning regulations. As such, with mitigation, the Project would not conflict with applicable zoning regulations governing scenic quality.

Citywide General Plan Framework

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

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

As discussed in Section 3, Project Description, of this MND, the Project Site is located in the Santa Monica Mountains in an area that is developed with residential, educational and church uses. Land uses

surrounding the Project Site include Mulholland Drive and Bel Air Presbyterian Church to the north, undeveloped land and Berkeley Hall School to the east and south, and Westland School and a parking lot to the southwest and west. The existing slopes and ridges in and abutting the eastern and southern portions of the Project Site provide a physical and visual barrier between the Project Site and the existing development to the south and east.

As discussed under Zoning above, the proposed new and expanded school uses would be similar in scale, height and architecture to the existing on-site school buildings and the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating a new low-rise building (e.g., the 30- foot-tall Learning Center) and other smaller improvements located largely within the existing development footprint of the school. Also: (1) the Project Site's general vicinity is already developed with residential, church and school uses, such that expanding and upgrading the property's educational facilities would not be out of character with the immediate area; (2) as discussed under Checklist Questions I.a and I.b above, and as indicated in Figure 17 through Figure 21, the Project would not create view blockages of the ridges south and east of the proposed improvements as seen from Mulholland Drive; (3) the majority of the Project Site would continue to be landscaping and open space under the Project, including the hillsides in the southern and eastern portions of the site and the ridges beyond, and intermittent views of these hillsides and ridges through the trees would continue to be available from Mulholland Drive; (4) the Project's Learning Center, Library expansion, storage/trash/recycling enclosure, and Upper Campus seating area and shade structure would all be well set back from Mulholland Drive, and would be behind existing school buildings and not visible or largely not visible from off-site locations along Mulholland Drive; and (6) the Project would include a net increase in floor area of only 22,508 square feet and would increase the existing on-site FAR by only 0.07, each of which would represent a minimal increase. Also, as indicated in Figure 9, most of the proposed improvements (for example, the proposed Learning Center) would not be visible from the residential neighborhood to the west due to intervening School buildings. Any portions of this development that would be visible (for example, potentially the proposed storage/trash/recycling enclosure) would be located several hundred feet away, would be low-rise development consistent in character with the existing on-site uses, and would be similar in scale to the other existing uses in the area. Under the Alternative LLA Scenario, the impacts of the Project on visual character would be even less because a 245-square-foot storage/trash/recycling enclosure would be developed at the site of the existing Upper Campus outdoor theater instead of the 1,370-square-foot storage/trash/recycling enclosure proposed in the Church portion of the LLA area, and because both the seating area and associated shade structure would be smaller under this alternate scenario. Regardless, for all these reasons, the Project would be compatible with existing development on and surrounding the Project Site, and thus would not conflict with the applicable objectives and policies governing scenic quality in the Citywide General Plan Framework Element.

Brentwood–Pacific Palisades Community Plan

The Brentwood–Pacific Palisades Community Plan (Community Plan) seeks to ensure that sufficient land is designated which provides for the housing, commercial, employment, educational, recreational, cultural, social and aesthetic needs of the residents of the plan area. The Plan identifies and provides for the maintenance of any significant environmental resources within the Plan Area. and seeks to enhance community identity and recognizes unique neighborhoods within the Plan Area. Goals, objectives, policies and programs are included to meet the existing and future needs and desires of the community. In addition, the Community Plan contains an Urban Design Chapter which lays out general urban design policies for development, including for parking and landscaping, to ensure quality design. The following Community Plan goals, policies and objectives related to scenic quality are applicable to the Project:

- **Objective 1-3:** To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.
- **Policy 1-3.1:** Seek a higher degree of architectural compatibility and landscaping for new development to protect the character and scale of existing residential neighborhoods.
- **Policy 1-6.5:** Require that any proposed development be designed to enhance and be compatible with adjacent development.
- **Policy 1-6.6:** The scenic value of natural landforms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.
- **Goal 4:** A community with sufficient open space in balance with development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources.
- **Objective 4-1:** To protect the resources of the Plan area for the benefit of the residents and of the region by preserving existing open space and, where possible, acquiring new open space.
- **Objective 6-1:** To site schools in locations complementary to existing land uses and community character.
- **Policy 6.1-1:** Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character.

The Project would be consistent with Objective 1-3 and Policies 1-3.1 and 1-6.5 in that the proposed improvements would be consistent with the scale, height and architecture of the existing school buildings and adjacent off-site uses, would be well set back from the off-site uses, would include additional landscaping including a net increase in on-site trees, and except for the proposed security pavilion and playground and associated wall and 15-foot-tall shade structure, would be developed behind the existing school fence, hedge, and buildings as seen from Mulholland Drive. The Project would be consistent with Policy 1-6.6 and Goal 4 in that it would develop the proposed uses largely on the flat terrace portion of the Project Site within the existing development footprint of the school, would retain the majority of the Project Site in landscaping and open space including the undeveloped hillsides in the southern and eastern portions of the Project Site and the ridges beyond, and would provide sufficient open space in balance with development to provide for the needs of the community and protect environmental and aesthetic resources by retaining the above open space and providing playfields and landscaped pedestrian courtyards for the school's students. The Project would be consistent with Objective 6-1 and Policy 6.1-1 to site schools in locations complementary to existing land uses and community character as it would expand an existing school, include school facilities within an area dominated by residential, school, and church uses, and provide development that is consistent in scale, height, and architecture with the existing on-site school building and adjacent off-site uses.

For all the above reasons, the Project would not conflict with the applicable goals, policies and objectives of the Community Plan related to scenic quality.

Mulholland Scenic Parkway Specific Plan

The Project Site is also located within the boundaries of the Mulholland Scenic Parkway Specific Plan (Specific Plan). The Specific Plan designates areas along the Mulholland Drive right-of-way within the Project Site's general vicinity as being within the Institutional Use Corridor.⁹ As defined by the Specific Plan, the Project Site is located within the Inner Corridor.¹⁰ The Specific Plan expressly allows educational institutions, provided they are located within the Institutional Use Corridor which, with regard to the Project Site, correlates to the boundaries of the Inner Corridor.

An analysis of the Project's consistency with applicable Inner Core development regulations of the Specific Plan is provided in Table 2, and an analysis of the Project's consistency with the design and scenic preservation guidelines of the Specific Plan is provided in Table 3. As indicated therein, the Project would be consistent with the applicable development standards and design and scenic preservation guidelines of the Specific Plan. The Specific Plan includes Environmental Protection Measures (Section 5.B) including protections for prominent ridges, streams parklands, oak trees, and archaeological and paleontological resources. The Project shows compliance with the intent of the Specific Plan Environmental Protection Measures as follows: (1) the Project would not include hillside or ridge top development, development in streams and parklands, or the removal of oak trees; (2) as discussed under Checklist Question V.b, the Project would not result in significant impacts to archaeological resources with compliance with applicable regulations; and (3) as discussed under Checklist Question VII.f, the Project would not result in significant impacts to paleontological resources with implementation of the mitigation measures identified in this MND. In addition, in accordance with City requirements, proposed Project buildings would be reviewed by the Mulholland Scenic Parkway Specific Plan Design Review Board to ensure the Project's consistency with the design and preservation guidelines of the Specific Plan, which also serves to complement and enhance the mitigation measures herein.

⁹ This area is defined as the area parallel to and 500 feet northerly and 500 feet southerly of the Mulholland Drive right-of-way beginning on the west at the intersection of Mulholland Drive and the Centerline of Corda Drive and terminating on the east at the west line of the San Diego Freeway. Also, an area parallel to and 500 feet southerly of Mulholland Drive right-of way beginning on the west at the east line of the San Diego Freeway and terminating on the east at a line that is parallel to and 400 feet westerly of the centerline of Roscomare Road. (See Specific Plan Maps 6 and 7.)

¹⁰ The Inner Corridor is defined as the Mulholland Scenic Parkway right-of-way plus the additional area which extends 500 feet outwards from the outermost boundaries of the right-of-way. (See Specific Plan Maps 6 and 7.)

Table 2
Project Consistency with Inner Core Regulations of the Mulholland Scenic Parkway Specific Plan

Objective/Policy	Analysis of Project Consistency
Section 5.A.2: Discretionary Uses.	Consistent. Pursuant to Section 5.A.2.b.iii of the Specific Plan, school uses and accessory buildings thereto are permitted within the Inner Core pursuant to discretionary approval, provided they are located within the Institutional Use Corridor. As described above, the Project Site is located within the Institutional Use Corridor, and the Project is seeking discretionary approval of a CUP as well as Design Review Approval under the Specific Plan. Therefore, the Project is consistent with this regulation.
Section 5.B.1: Prominent Ridges. Prominent ridges shall not be graded, altered, or removed without the prior written approval of the Director pursuant to Section 11. Buildings and structures visible from Mulholland Drive shall not be constructed on the top of a prominent ridge. Buildings and structures visible from Mulholland Drive shall not be constructed within 50 vertical feet of the top of a prominent ridge without the prior written approval of the Director pursuant to Section 11.	Consistent. As indicated in Figure 3, of this MND, practically the entire currently developed portion of the Project Site is located on a relatively flat terrace, the one exception being the southern portion of the existing fire road which traverses the Prominent Ridge located south and east of the Project Site and connects to the Berkeley Hall School campus. As indicated in Figure 4, the proposed improvements would also be largely limited to the flat terrace area and the existing development footprint of the school (for example, the Learning Center building is proposed in an existing school playfield, the Library addition is proposed as an expansion of the second floor of the Library, and the storage/trash/recycling enclosure would be developed primarily within a portion of the existing Church parking lot). No grading of the existing Prominent Ridge is proposed as part of the Project, and no buildings would be constructed on top of a prominent ridge. The maximum height of the proposed Project in relation to the nearest existing Prominent Ridge would be well below the ridgeline and would be reviewed and approved by the Director in connection with the Project's Design Review Board and Project Permit Compliance entitlement requests.
Section 5.B.2: Streams. No project shall be constructed and no more than 100 cubic yards of earth shall be moved within 100 feet of either stream bank without the prior written approval of the Director pursuant to Section 11.	Consistent. No streams or stream banks are located on the Project Site or in the proximity of the proposed Project activities.
Section 5.B.3: Projects Near Parklands. No project shall be erected and no earth shall be graded within 200 feet of the boundaries of any public parkland without the prior written approval of the Director pursuant to Section 11.	Consistent. No public parklands are located on the Project Site or in the proximity of the proposed Project activities.
Section 5.B.4: Oak Trees. No oak tree (<i>quercus agrifolia</i> , <i>lobata</i> , <i>q. virginiana</i>) shall be removed, cut down or moved without the prior written approval of the Director.	Consistent. As discussed under Checklist Questions I.b above and IV.e below, no protected oak trees would be removed, cut down, or moved under the Project.
Section 5.B.5: Archaeological and Paleontological Resources. Applicants which propose to grade more than 50 cubic yards per 5,000 square feet of lot area shall submit to the Director a preliminary archaeological and paleontological record search	Consistent. The Project Site currently contains approximately 237,846 square feet of lot area, which would be increased to 262,070 square feet under the proposed LLA, and the Project proposes a total of 12,600 cy of total grading (7,400 cy of cut, 5,200 cy of fill), which is equivalent to approximately 240 cy of

Table 2 (Continued)
Project Consistency with Inner Core Regulations of the Mulholland Scenic Parkway Specific Plan

Objective/Policy	Analysis of Project Consistency
from the State Regional Archaeological Information Center (UCLA).	grading per 5,000 square feet of lot area. Therefore, preliminary archaeological and paleontological record searches are required under the Specific Plan. Archaeological and paleontological records searches were conducted for the Project and are included as Appendices 5 and 8, respectively of this MND. As indicated therein, and as discussed in Checklist Sections V, Cultural Resources, and VII, Geology and Soils, of this MND, no archaeological or paleontological resources have been previously recorded at the Project Site.
Section 5.C: Grading. No grading in excess of one cubic yard of earth per four square feet of lot area per lot visible from Mulholland Drive shall be permitted without the prior written approval of the Director pursuant to Section 11. All graded slopes shall comply with the provisions in Section 10 of this Specific Plan.	Consistent. As noted above under Section 5.B.5, the Project proposes a total of 12,600 cy of total grading (7,400 cy of cut, 5,200 cy of fill), which is equivalent to only 0.20 cy per 4 sf of the Project Site's lot area. The Project Site's slopes are not proposed to be graded, except potentially for a small area of the Upper Campus in the area of the proposed seating area and shade structure as indicated in Figure 15. Regardless, the Project would comply with all grading standards of Section 10 of the Specific Plan, as applicable.
Section 5.D.1: Viewshed Protection. No building or structure visible from Mulholland Drive on an upslope or downslope lot shall penetrate the viewshed without the prior written approval of the Director pursuant to Section 11.	Consistent. As shown in the viewshed analysis prepared pursuant to the Specific Plan (Appendix 1 of this MND), the southernmost parapet of the Project's proposed Learning Center would only very slightly penetrate the viewshed, resulting in only minimal visual effects as seen from Mulholland Drive, and would not significantly alter or obscure the existing visual field or views. Similarly, the Project's proposed playground shade canopy would only slightly penetrate the existing viewshed and would not alter or obscure the existing visual field or views of the off-site Prominent Ridge located to the south and east of the Site. None of the other Project improvements would penetrate the viewshed.
Section 5.D.2: Allowable Building Heights. On an upslope lot, the height of any building or structure which is visible from Mulholland Drive and which is located within the first 100 feet from the Mulholland Drive right-of-way, shall not exceed 15 feet. On an upslope lot, the height of any building or structure which is visible from Mulholland Drive and which is located more than 100 hundred feet up to five hundred feet from the Mulholland Drive right-of-way, shall not exceed 30 feet.	Consistent. The Project's proposed security pavilion and pedestrian entry gate, playground, 6-foot playground wall and 15-foot-tall playground shade structure would all be located within the first 100 feet from the Mulholland Drive right-of-way but would not exceed 15 feet in height. The proposed Learning Center, second-story library addition, storage/trash/recycling enclosure, and Upper Campus shade structure would all be located between 100 feet and 500 feet from the Mulholland Drive right-of-way and would not exceed 30 feet in height. Therefore, the Project would be consistent with this standard.
Section 5.D.3: Yard Requirements. There shall be a front yard of not less than 20% of the depth of the lot, but which need not exceed 40 feet. There shall be a side yard on each side of the main building of not less than 10% of the width of the lot, but which need not exceed 20 feet.	Consistent with Requested Entitlement Approval. The Project Site has a maximum depth of approximately 490 feet and a maximum width of approximately 700 feet. The minimum front and side yard requirements are, therefore, 40 feet and 20 feet, respectively. The school's existing main buildings are set back more than 40 feet from the Project Site's northerly front property line; however, this front setback area is currently improved with the School's parking areas, fencing, hedges, and entry gates. While the Project's

Table 2 (Continued)
Project Consistency with Inner Core Regulations of the Mulholland Scenic Parkway Specific Plan

Objective/Policy	Analysis of Project Consistency
	proposed security pavilion and pedestrian entry gate, playground, and 15-foot-tall shade structure would not result in significant alterations to the existing visual character of the Project Site or substantially intrude into the existing viewshed, they would be constructed within the required front setback area, and result in an effective zero-foot front yard setback at these limited locations. Furthermore, the proposed storage/trash/recycling enclosure would be constructed upon a portion of the Church parking lot to be added to the Project Site pursuant to the LLA, resulting in a zero-foot side yard setback at the southwestern corner of the Learning Center. Accordingly, a Specific Plan Exception is being requested to allow these reduced northerly front yard and westerly side yard setbacks.
Section 5.D.4: Fences, Gates and Walls. All fences, gates and walls visible from Mulholland Drive shall be constructed of the following materials: rough-cut, unfinished wood; native-type stone; split-face concrete block; textured plaster surface walls; black or dark green chain link or wrought iron; or a combination thereof.	Consistent. The Project would retain the school's existing black wrought-iron perimeter fence along Mulholland Drive, the new pedestrian entry gate adjacent to the new security pavilion would match the existing fence materials and construction, and the new site wall proposed as part of the playground would be plastered and covered with vine plantings.
Section 5.D.5: Drain Pipes laid on the ground and visible from Mulholland Drive shall be black or earth tone brown	Consistent. The Project does not propose drain pipes to be laid on the ground and visible from Mulholland Drive.
Section 5.D.5: Utilities. The Advisory Agency, where feasible, shall require that all utilities installed in connection with the development of new subdivisions be placed underground.	Consistent. No subdivision is proposed in conjunction with the Project; notwithstanding, the utilities associated with the Project would be placed underground.
Section 5.D.5: Roofs. All roofs visible from Mulholland Drive shall be surfaced with non-glare materials and no equipment shall be placed thereon. This provision shall not apply to solar energy devices.	Consistent. The proposed storage/trash/recycling enclosure would not be visible from Mulholland, Furthermore, while small portions of the roofs of the Learning Center and second-story library addition would be visible from Mulholland Drive (for example, see View 2 in Figure 16 and View 7 in Figure 18), these roofs would be surfaced with non-glare materials and any rooftop equipment would be shielded from view.
<i>Source: Eyestone Environmental, August 2021.</i>	

Table 3
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

Summary of Objective/Policy	Analysis of Project Consistency
Objective 1.1: Design projects to minimize the visibility of the project as seen from Mulholland Drive.	Consistent. As indicated in Figure 17 through 21, the limited height (30 feet maximum) of the proposed improvements and the fact that most of the improvements would be on the south side of the existing school buildings and largely blocked from view from Mulholland Drive, would together result in minimal visibility of the proposed improvements from Mulholland Drive. Furthermore, none of the improvements proposed within the Upper Campus and LLA area (i.e., the storage/trash/recycling enclosure, seating area and shade structure) would be visible from Mulholland Drive. The new playground proposed in the northern portion of the Project Site, immediately northwest of the existing basketball courts, would have associated with it a proposed 15-foot-tall shade structure and 6-foot wall that would be intermittently visible through the trees from Mulholland Drive. However, the wall would be well set back from Mulholland Drive, would be planted with climbing vines to soften its visual appearance, and would blend in with the existing campus improvements (for example, with the existing wall and hedge in the northern portion of the site). Furthermore, while the top of the shade structure and the wall would be visible from Mulholland Drive intermittently through the trees as indicated in the visual simulations in Figure 20 (specifically Views 7 and 8): (1) the area of these proposed improvements is currently occupied by an existing handball court, hopscotch area and paved play area rather than being in undeveloped open space; and (2) these proposed improvements would represent only a small portion of the total field of view as seen from Mulholland Drive, and would not obscure views of the existing natural ridgetops south and east of the Project Site.
Guideline 1: Natural Topography. Minimize the amount of grading and the use of retaining walls. Design structures and grading to fit the natural topography and existing conditions of the site.	Consistent. As indicated in Figure 3, practically the entire currently developed portion of the Project Site is located on a relatively flat terrace, the one exception being the southern portion of the existing fire road which traverses the Prominent Ridge south of the Project Site and connects to the Berkeley Hall School campus. As indicated in Figure 4, the proposed improvements would also be largely limited to the flat terrace area and the existing development footprint of the school (for example, the Learning Center building is proposed to replace an existing school playfield that is surrounding by existing school buildings, and the storage/trash/recycling enclosure is proposed to be located largely in the existing Church parking lot portion of the proposed LLA area). Furthermore, the proposed improvements would include only 0.3 acre of new developed area and would be clustered around the existing school facilities largely within the existing development footprint of the school, which would retain the majority of the Project Site as landscaping and open space, retain the existing topography of the site, and minimize the need for grading.

Table 3 (Continued)
**Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic
Parkway Specific Plan**

Summary of Objective/Policy	Analysis of Project Consistency
Guideline 2: Sloping Site Profile: Where a building is situated on a slope greater than 25 percent, the building should utilize a stepped profile.	Consistent. No existing on-site buildings are located on, and the proposed Learning Center building and other proposed improvements would not be located on, slopes of greater than 25 percent. In fact, the proposed improvements would be developed largely within the existing development footprint of the school which includes a relatively flat terrace area.
Guideline 3: Silhouetting. Structures on a slope of ridges should be designed and sited so they are not skylighted or silhouetted against the sky.	Consistent. The Project would be developed on a relatively flat terrace rather than on a slope of ridges, and as indicated in Figure 17 through Figure 21, none of the proposed improvements would be skylighted or silhouetted against the sky (e.g., extend above the Prominent Ridge south and east of the Project Site) as seen from Mulholland Drive.
Guideline 4: Site Drainage. Although drainage controls are determined by the Department of Public Works, the design review process may include consideration of grading and landscaping to control erosion. Runoff should be dispersed on the project site or should be diverted to a drainage facility. Drainage structures (terraces, drains, benches and intervening devices) should be placed on graded slopes as inconspicuously as possible and be constructed from natural-colored materials. Down drains should be placed in swales. Drainage structures or swales that are visible from a public way should be bermed and/or landscaped to blend into the background. Water retention basins should be well camouflaged with landscaping. The concrete in any drain or retention basin that is visible from a public way should be tinted an appropriate earth tone to blend in closely with the surrounding natural materials. Exposed PVC pipes should be painted an earthen or green color.	Consistent. As indicated in the Water Resources Technical Report included as Appendix 12 of this MND, the Project would increase impervious surface at the Project Site by approximately 0.3 acre, or from 32 to 36 percent of the Project Site. This increase in impervious surfaces would increase the Q50 flow from the Project Site by an estimated 0.19 cfs, or from 26.06 to 26.25 cfs (an approximately 0.7-percent increase). As indicated in Figure 3 of the Water Resources Technical Report, the existing pattern of surface water runoff at the Project Site would remain largely unchanged, with surface water runoff from the northern portion of the site continuing to drain to the existing 18-inch Mulholland Drive storm drain and runoff in the southern portion of the site continuing to drain to the 54-inch storm drain with an inlet at the low point within the fire access road. In addition, site runoff would continue to be processed through water quality BMPs, and a portion of this flow would continue to be re-used for on-site irrigation. Also, the incremental increase in the Q50 flow would be directed to an underground capture and use cistern for re-use for on-site irrigation, with only any overflow from the system directed to the existing 54-inch storm drain. Furthermore, in accordance with requirements of the City's LID Ordinance, additional BMPs would be implemented throughout the operational life of the Project, as required, to reduce erosion and siltation (as well as urban pollutants). Hence, the incremental increase on stormwater associated with the Project would be collected and either re-used as irrigation water or diverted to an underground drainage facilities for collection and discharge to existing drainage facilities. As such, site drainage under the Project would be inconspicuous and would not result in visual impacts.
Guideline 5: Site Permeability. The total non-permeable surfaces should be minimized and not exceed 50 percent.	Consistent. The Project would increase impervious surfaces at the Project Site by only 0.3 acre (e.g., from 32 to 36 percent of the Project Site) which would represent a negligible increase.^a Furthermore, the majority of the Project Site would continue to be pervious surfaces under the Project.^b In addition, the Project would comply with City LID requirements

Table 3 (Continued)
**Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic
Parkway Specific Plan**

Summary of Objective/Policy	Analysis of Project Consistency
	including, potentially, the use of porous pavement.
Guideline 6: Site Fencing. Fences and walls should not obstruct the right-of-way or views from Mulholland.	Consistent. The existing black vertical-barred wrought fence along the Project Site's Mulholland Drive frontage would not be changed under the Project. Furthermore, while the proposed 140-square-foot security pavilion would be constructed between Mulholland Drive and the existing school buildings, this structure would be well set back from Mulholland Drive (e.g., would be south of the existing school parking lots along Mulholland), would not obstruct the Mulholland Drive right-of-way, and would be too small to obstruct views from Mulholland (for example, see View 4 in Figure 17). In addition to the above structure, the proposed playground and associated 15-foot-tall shade structure and 6-foot wall would be constructed at the northern portion of the Project Site facing Mulholland Drive. However, these improvements would be set back from Mulholland Drive and would thus not obstruct the Mulholland right-of-way. Furthermore, because of the proposed location and for the reasons discussed in the consistency analysis for Objective 1 above, these improvements would not obstruct views from Mulholland (for example, see View 8 and 9 in Figure 18).
Guideline 7: Additional On-site Parking. Where additional on-site parking is required, it should be located within a garage or covered carport.	Consistent. The Project would not require, and does not propose, additional on-site parking.
Guideline 10: Site Grading. Grading and structures should be designed to fit the project to the natural topography and existing site conditions, rather than altering the site to fit the project. The plan should minimize grading and preserve the existing topographic features. Grading should not extend into the right-of-way of Mulholland Drive. Grading limits. The Specific Plan limits the maximum quantity of grading that can be approved without a Specific Plan exception. Proposed grading projects may be disapproved if the amount of design impacts the scenic resources of Mulholland Drive is incompatible with the natural contours or is incompatible with the Parkway environment.	Consistent. A Specific Plan exception would not be required and is not proposed for the Project's grading, as this grading would be very limited (e.g., would affect only 1.45 acres, most of which would be on the south side of the Project Site and well away from Mulholland Drive, and would include only approximately 12,600 cy of total grading, including approximately 7,400 cy of cut, 5,200 cy of fill, and 2,200 cy of soil export), which is far below the Specific Plan's limits. Furthermore, for the reasons discussed in the consistency analysis for Guideline 1 above, and because most of the proposed improvements (including the new Learning Center building) would be located on the south side of the school property and obscured from view from Mulholland Drive by the existing on-site fence and academic buildings, the Project would not include grading that would be incompatible with the natural contours or incompatible with the Parkway environment. Lastly, Project grading would not extend into the Mulholland Drive right-of-way.
Guideline 11: Landform grading. In order to create slopes that reflect as closely as possible to the surrounding natural hills, graded hillsides and should have a variety of slope ratios, should not exceed a ratio of 2:1 and should transition to the natural slope in a manner that produces a natural	Consistent. See the consistency analysis for Guideline 1 above (e.g., the improvements would be developed on the flat terrace portion of the Project Site within the existing development footprint of the school, would not include hillside development would not alter the existing topography, etc.). Furthermore, graded Project slopes would not exceed a ratio

Table 3 (Continued)
**Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic
Parkway Specific Plan**

Summary of Objective/Policy	Analysis of Project Consistency
appearance.	of 2:1, ^c nor would the proposed improvements encroach substantially into the existing slopes in the southern and eastern hillside portions of the Project Site.
Guideline 12: Trees. Oak trees and other native tree species have special protection and should be preserved.	Consistent. As discussed under Checklist Questions I.b above and IV.e below, no protected trees would be removed under the Project. Furthermore, while Project construction activities would occur in close proximity to one of four existing protected trees overhanging the Project Site, the implementation of Mitigation Measure BIO-2 would protect this tree from adverse effects associated with Project construction activities.
Guideline 13: Wildlife. Projects that are near parks and wildlife corridors should be sensitive to preserving wildlife habitats and the ecology of the Scenic Parkway. Fencing should be placed to not interfere with wildlife movement.	Consistent. The Project would include additional development within the existing graded development footprint of the school rather than in the undeveloped hillside portions of the site, would not extend fencing to the undeveloped hillside areas, and would not impact existing wildlife corridors (for example, no riparian threads that could be used as wildlife corridors bisect the Project Site). See the analysis under Checklist Question IV.d below for further discussion.
Guideline 14: Natural drainage patterns. Natural drainage patterns should not be obstructed or significantly altered as a result of grading.	Consistent. The Project would include additional development. However, this development would occur on the flat terrace portion of the Project Site within the existing development footprint of the school, would not substantially increase on-site impervious surfaces (e.g., only a 0.3-acre increase), and would continue to retain the majority of the Project Site as pervious surfaces. ^e Furthermore, as discussed in the Water Resources Technical Report included as Appendix 12 of this MND, the Project would not substantially alter existing drainage patterns. ^f
Guideline 15: Streams. Streams should be protected.	Consistent. No watercourses bisect the Project Site. ^g Therefore, the Project would not affect any streams.
Guideline 16: Parkland. Projects near parklands are to be carefully reviewed.	Consistent. The Project Site is not located adjacent to designated public parklands. ^h Nevertheless, the Project is undergoing review for its proposed entitlements as well as design review.

Table 3 (Continued)
**Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic
Parkway Specific Plan**

Summary of Objective/Policy	Analysis of Project Consistency
Guideline 17: Visibility Study. To determine project visibility from Mulholland Drive, all lines of sight from Mulholland Drive towards the project within a ¾ mile radius should be included in the visibility study.	Consistent. As discussed under Checklist Questions 1.a through 1.c above, and as shown in Figure 17 through Figure 21, the majority of the Project Site is not, and the majority of the proposed improvements would not be, visible from Mulholland Drive. Furthermore, per the previous analysis, with mitigation the Project would result in less than significant aesthetics and views impacts. For example, the proposed Learning Center building, 15-foot-tall playground shade structure and wall, and other proposed improvements would not extend above the Prominent Ridge located immediately south and east of the Project Site as seen from Mulholland Drive (and in fact, at most viewpoints along the drive, most of the Project improvements would not be visible). Specifically, Figure 17 through Figure 21 depict visual simulations of the Project as seen from 12 line-of-sight locations along Mulholland Drive and confirm the minimal visibility of the Project improvements.
Guideline 18: Viewshed protection. Projects located within the Inner Corridor and visible from Mulholland Drive are not permitted to extend into the viewshed unless the project is approved by the Director after a finding that the project complements the view from Mulholland Drive.	Consistent. The Project would not significantly extend into the viewshed from Mulholland Drive. Specifically, as indicated in the consistency analysis for Specific Plan Section 5.D.1 and Guideline 17 above, the Project would include additional low-height (e.g., one- and two-story) improvements within the existing development footprint of the school. As indicated in the viewshed analysis included as Appendix 1 of this MND, the southernmost parapet of the Project's proposed Learning Center would only very slightly penetrate the viewshed, resulting in only minimal visual effects as seen from Mulholland Drive, and would not significantly alter or obscure the existing visual field or views. Similarly, the Project's proposed playground shade canopy would only slightly penetrate the existing viewshed and would not alter or obscure the existing visual field or views of the off-site Prominent Ridge located to the south and east of the Site. None of the other Project improvements would penetrate the viewshed. Therefore, by proposing the Project's contemplated improvements to be located within the school's existing development footprint and in compliance with the Specific Plan's height limits, the required finding can be made that the Project would complement the view from Mulholland Drive.
Guideline 19: Viewshed analysis. A viewshed analysis should be prepared for any project, whether upslope or downslope, that is located within the inner corridor and visible from Mulholland Drive.	Consistent. See the Project's viewshed analysis (Appendix 1 of this MND) as well as the consistency analysis for Specific Plan Section 5.D.1 as well as for Objective 1.1 and Guidelines 17 and 18 above.
Objective 1.5: Limit unnecessary access to and construction within the Mulholland Drive right-of-way. Guideline 20: Right of way Construction. Placement of structures, walls, fences, light	Consistent. The Project does not propose new structures, walls, fences, trees, other landscaping, or irrigation systems to be placed within the Mulholland Drive right-of-way, and no new driveways off of Mulholland Drive would be constructed.

Table 3 (Continued)
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

Summary of Objective/Policy	Analysis of Project Consistency
fixtures, trees, plants or other landscaping and irrigation systems in the right-of-way of Mulholland should be avoided.	
Guidelines 21: Core Trail. Design projects to provide for future placement and use of the Core trail along the Mulholland right-of-way.	Consistent. Any future placement or use of the Core Trail would not be impacted by the Project (e.g., the Project does not propose structures or fences within the Mulholland Drive right-of-way or within the existing school parking lots along Mulholland Drive).
Guideline 22: Right of way grading. Existing slopes adjoining the roadway of Mulholland Drive should not be graded.	Consistent. No grading of existing slopes would occur under the Project within or immediately adjacent to the Mulholland Drive right-of-way (the existing and proposed school improvements are/would all be located south of the existing parking lots).
Guideline 23: Right of way landscaping. Preserve and maintain existing native trees and plants.	Consistent. The existing native trees and plants within the Mulholland Drive right-of-way would be preserved under the Project as would the vast majority of the existing on-site trees. Furthermore, additional on-site trees would be planted under the Project.
Guideline 24: Entry gateways. Gateways and entryways should not penetrate the viewshed and should be compatible in design and appearance with structures in the vicinity.	Consistent. No new entry gateways or entryways are proposed directly off of Mulholland Drive. Furthermore, while the Project would include a security pavilion and associated pedestrian entry gate on the north side of school campus, this security pavilion would be well set back from the Mulholland Drive roadway and would be very limited in size (e.g., 140 square feet) and height (e.g., 8 feet for the pavilion and 8.5 feet for the entry gate) such that it would not penetrate the Mulholland Drive viewshed. Furthermore, all the proposed improvements would be developed with muted colors and materials that blend with the existing on-site buildings and the surrounding landscape, and as discussed previously, most of these improvements not visible from Mulholland Drive. While the 15-foot-tall shade structure and 6-foot wall associated with the proposed playground would be visible from Mulholland Drive, for the reasons discussed in the consistency analysis for Objective 1.1 above, these improvements would have minimal visual effects as seen from Mulholland Drive. Lastly, none of the Project improvements would extend above the Prominent Ridge immediately south and east of the Project Site as seen from Mulholland Drive.
Guideline 25: Driveways. Design driveways so that they do not enter or intersect Mulholland Drive if other options are available.	Consistent. The Project would not alter the existing or include new driveways off of Mulholland Drive.
Guideline 26: Obstructions. Provide adequate visibility and site distance for oncoming traffic where any driveway meets the road.	Consistent. The Project would not alter the existing driveways or include any new driveways into the Project Site from Mulholland Drive. Furthermore, all the proposed improvements would be well set back from Mulholland Drive (e.g., would be located south of the existing parking lots along Mulholland Drive). Therefore, the Project would provide

Table 3 (Continued)
Project Consistency with Relevant Design and Preservation Guidelines of the Mulholland Scenic Parkway Specific Plan

Summary of Objective/Policy	Analysis of Project Consistency
	adequate visibility and site distance for oncoming traffic along Mulholland Drive.
Guideline 27: “Dirt Mulholland.” It is recognized that the unpaved portion of Mulholland Drive is considered a unique feature.	Consistent. The Project Site is not located in proximity to “Dirt Mulholland.”
^a KPFF Consulting Engineers, <i>Mirman School for Gifted Children Water Resources Technical Report</i>, July 2021. Included as Appendix 12 of this MND. ^b KPFF Consulting Engineers, <i>Mirman School for Gifted Children Water Resources Technical Report</i>, July 2021. Included as Appendix 12 of this MND. ^c Geosyntec Consultants, <i>Preliminary Geotechnical Investigation for the Proposed Mirman School Learning Center</i>, January 20, 2021. Included as Appendix 7.2 of this MND. ^d KPFF Consulting Engineers, <i>Mirman School for Gifted Children Water Resources Technical Report</i>, July 2021. Included as Appendix 12 of this MND. ^e KPFF Consulting Engineers, <i>Mirman School for Gifted Children Water Resources Technical Report</i>, July 2021. Included as Appendix 12 of this MND. ^f KPFF Consulting Engineers, <i>Mirman School for Gifted Children Water Resources Technical Report</i>, July 2021. Included as Appendix 12 of this MND. ^g City of Los Angeles Department of City Planning, <i>Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004</i>, http://ZIMAS.lacity.org/, accessed January 2, 2019. ^h City of Los Angeles, <i>Brentwood–Pacific Palisades Community Plan, General Plan Land Use Map</i>, January 27, 2014. Source: Eyestone Environmental, August 2021.	

Citywide Urban Design Guidelines

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

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

As discussed in Section 3, Project Description, of this MND, upon implementation of the Project, on-site pedestrian circulation would be improved by providing additional landscaped walkways and improving the connection between the school parking lots and the school buildings with a new entry pavilion. In addition, the Project would not include new driveways off of Mulholland Drive or of the main drive into the school (which runs along the western boundary of the school) and would not include new landscaping immediately adjacent to Mulholland Drive, and thus would not increase the potential for vehicle-pedestrian conflicts or diminish site/driveway visibility.

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

Primary vehicular access to the Project Site would remain unchanged under the Project (i.e., would continue to be from Mulholland Drive via three existing school driveways). Furthermore, as noted above, on-site pedestrian circulation would be improved by providing additional landscaped walkways and improving the connection between the school parking lots and the school buildings with a new entry pavilion, and no new driveways that could potentially result in vehicle/pedestrian conflicts would be development. Hence, the Project would be consistent with Guideline 2.

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

As previously discussed, the Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site, as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while providing new landscaped pedestrian courtyards and integrating new low-rise buildings with existing buildings on the Project Site. The Project would also provide a new entry pavilion to improve the pedestrian connection between the school's parking lots and buildings. Hence, the Project would be consistent with Guideline 3.

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

The Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site, as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics while integrating new low-rise buildings with existing buildings on the Project Site, and the majority of the Project Site would remain as landscaping and open space (including the natural hillsides in the southern and eastern portions of the Project Site and the ridges beyond). In addition, most of the proposed improvements, including the proposed new Learning Center building, would be well set back from the adjacent off-site uses and behind the existing school buildings as seen from Mulholland Drive and Westland School and the residential uses west of the Project Site. Furthermore: (1) the Project Site's general vicinity is already developed with residential, educational and church uses such that expanding and upgrading Mirman School's educational facilities would not be out of character with the immediate area; and (2) the Project's proposed maximum height of 30 feet also would not create view blockages from Mulholland Drive (see Checklist Questions I.a and I.b above for analysis). Lastly, the majority of the existing trees on the Project Site would be retained under the Project, including along the Project Site's Mulholland Drive frontage), and any trees to be removed would be replaced. Hence, the Project would be consistent with Guideline 4.

Guideline 5: Express a clear and coherent architectural idea

The Project would be implemented within an existing school campus. The new and expanded buildings would be similar in scale, massing, and height to the existing educational facilities already on the Project Site, as well as the surrounding uses. In particular, the Project would retain and enhance the Project Site's open space characteristics through the provision of open spaces plazas, new playground, and new outdoor student seating area with shade structure, while integrating new low-rise buildings with existing buildings on the Project Site. Furthermore, the architecture of the proposed improvements would be contemporary but would be inspired by the tradition of simple utilitarian ranch buildings in the Santa

Monica Mountains and would utilize a muted material palette selected to blend in with the indigenous hillside landscape (such as exposed fire-treated wood framing that would serve to connect the new buildings to the existing campus buildings). Hence, the Project would be consistent with Guideline 5.

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

The Project Site would provide amenities that support community building and provide an inviting, comfortable user experience. The Project would do so through: (1) the provision of additional community-serving school facilities; (2) development that is consistent with the scale, height and architecture of the existing on-site school facilities and off-site uses; (3) development with contemporary architecture but inspired by the tradition of simple utilitarian ranch buildings in the Santa Monica Mountains with a muted material palette selected to blend in with the indigenous hillside landscape (such as exposed fire-treated wood framing that would serve to connect the new buildings to the existing campus buildings); (4) the retention of the approximately percent of the Project Site as landscaping and open space, including the undeveloped hillsides in the southern and eastern portions of the Project Site and the ridges beyond; and (5) the replacement of any on-site trees to be removed, the retention of the existing street trees along the Project Site's Mulholland Drive frontage (with the exception of one tree that could be determined to be a street tree; if so designated and removed, this tree would be replaced on a 4:1 or greater basis pursuant to current Urban Forestry Division policy and following approval by the City's Board of Public Works), the provision of enhanced landscaping, and the provision of additional landscaped pedestrian courtyards for students; and (6) the provision of open spaces plazas, new playground, and new outdoor student seating area with shade structure. Hence, the Project would be consistent with Guideline 6.

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

The Project would carefully arrange design elements and uses to protect site users. The Project would do so by: (1) developing the proposed improvements largely within the flat terrace portion and the existing development footprint of Mirman School; (2) providing new pedestrian paths and landscaped pedestrian courtyards within the school; (3) avoiding the development of new driveways along Mulholland Drive that could potentially result in vehicle/pedestrian conflicts; and (4) providing a new entry pavilion to provide a better pedestrian connection between the school parking lots and school buildings. Furthermore, the Project would retain and enhance the existing fence around the campus to protect school students. Hence, the Project would be consistent with Guideline 7.

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

As discussed above, the Project would develop the proposed uses largely on the existing flat terrace portion of the Project Site within the existing development footprint of the school and would retain approximately percent of the Project Site as landscaping and open space, including the undeveloped hillsides in the southern and eastern portions of the Project Site and the ridges beyond. As indicated in the analysis under Checklist Questions I.a and I.b above, the Project would retain views of the undeveloped hillsides in the southern and eastern portions of the Project Site and the ridges beyond as seen from Mulholland Drive. As discussed in the analysis later in this MND, the Project would not impact agricultural and forestry resources, would result in less than significant impacts to biological resources with mitigation incorporated, and would result in less than significant impacts to water resources. Hence, the Project would be consistent with Guideline 8.

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

The Project would represent sustainable development in that it would be developed on an already developed site that is surrounded by urban development within an urbanized area rather than the expansion of development into an undeveloped area. In addition, the Project has been designed, and would be constructed, to incorporate environmentally sustainable building features and construction protocols required by California Title 24, the Los Angeles Green Building Code and CalGREEN. Additionally, it is expected that the transport of Project construction materials would be in compliance with the applicable regulatory requirements regarding energy usage such as Federal Corporate Average Fuel Economy (CAFE) standards. These features and protocols would reduce energy and water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. “Green” principles are also incorporated throughout the Project to comply with the sustainability intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED®) program to meet the standards of LEED Silver or equivalent green building standards. These include energy conservation, water conservation, and waste reduction features. Specifically, the Project would incorporate the following features in the new/renovated floor area and new landscape areas to support and promote environmental sustainability: Energy Star appliances; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; head island reduction; optimized energy performance; rainwater management (e.g., capture and reuse of a portion of the rainwater that falls on the Project Site); water-efficient landscaping; and the storage and collection of recyclables. The Project would also incorporate LEED conservation measures during construction, such as the use of recycling construction materials, building life-cycle impact reduction, and building product optimization, through the implementation of a Construction and Demolition Waste Management Plan. In addition, Mirman School has 13 existing parking spaces capable of supporting future electric vehicle (EV) supply equipment (EVSE) and three parking spaces equipped with EV charging stations and/or outlets for plugin, and these parking spaces would be retained under the Project. Mirman School also has four short-term bicycle parking spaces and is proposing 36 additional short-term and four new long-term bicycle parking spaces for a total of 40 short-term and 4 long-term spaces which would meet LAMC bicycle parking space requirements for the Project. Therefore, while the proposed improvements have not specifically been oriented to lower energy demand, the proposed energy conservation measures and other features of the Project would nevertheless lower energy demand and increase the comfort and well-being of users. Hence, the Project would be consistent with Guideline 9.

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

The Project has been designed with green features to minimize the extent of non-permeable surfaces, capture stormwater runoff and promote habitat. The Project has been designed to minimize the extent of non-permeable surfaces by developing the proposed improvements largely within the existing development footprint of the school such that the majority of the Project Site would continue to be retained as landscaping and open space). The Project would increase impervious surfaces at the Project Site by only 0.3 acre (e.g., from 32 to 36 percent of the Project Site) which would represent a negligible

increase.¹¹ Furthermore, Best Management Practices (BMPs), including but not limited to a capture and reuse cistern and potentially permeable pavement are proposed to maximize infiltration of stormwater to the groundwater and allow for the capture and re-use of stormwater runoff in accordance with the City's Low Impact Development (LID) Ordinance. Lastly, the existing hillsides and ridges in the southern and eastern portions of the Project Site would be retained in their existing natural undeveloped condition which would promote habitat conservation. Hence, the Project would be consistent with Guideline 10.

Conclusion

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

Mitigation Measures AES-1, AES-2, AES-3

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

Less Than Significant Impact. The Project Site currently generates low to moderate levels of artificial light and glare typical of a small school campus. Light sources within the Project Site include low-level security and pedestrian lighting, vehicle headlights, interior lighting emanating from the existing academic buildings on the Project Site, and surface parking lot lighting. Glare sources within the Project Site include small areas of glass windows, as well as motor vehicles (there are hardly any exterior metal surfaces on the existing buildings). The surrounding ambient nighttime lighting environment includes scattered low- to low-moderate light sources typical of a semi-urbanized area with scattered urban development. The primary nighttime lighting sources in the Project Site vicinity include scattered interior light spillage from buildings, vehicle headlights along roadways and in parking areas, lit surface parking lots, and security/parking lighting. The Mulholland Drive right-of-way does not contain streetlights in the Project Site vicinity.

Construction

In accordance with the provisions of LAMC Section 41.40, construction activities would be limited to the hours between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. Therefore, construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours during the winter season when daylight is no longer sufficient. Furthermore, construction-related illumination would be used for safety and security purposes only and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Site boundary. In addition, most Project construction lighting would occur interior to the Project Site (e.g., behind the existing academic buildings, existing street trees, landscaping and hedge, and the proposed landscape buffer along Mulholland Drive). Overall, Project construction lighting would be temporary, and cease once construction is completed. It is also noted that the only sensitive off-site land

¹¹ KPFF Consulting Engineers, Mirman School for Gifted Children Water Resources Technical Report, July 2021. Included as Appendix 12 of this MND.

use in the vicinity of the Project Site that could potentially have views of Project construction lighting, the residential subdivision to the west, is located approximately 800 feet from the Project Site, and views of the proposed Learning Center building from this subdivision would be partially obscured by the existing intervening on-site academic buildings (construction associated with the proposed storage/trash/recycling enclosure could potentially be more visible from the residential area, but the construction activities would be of low-intensity given the small size [1,370 square feet] of the enclosure, and again, the residential units are approximately 800 feet away). Therefore, construction activities would not result in a new source of substantial light that would adversely affect day or nighttime views in the area. The Project construction-related lighting impact would be less than significant, and no mitigation measures are required.

Daytime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. In addition, Project construction activities would not include the handling or installation of exterior building materials composed of large expanses of glass or metal that could generate daytime reflective glare. Furthermore, as noted previously, most of the proposed improvements and thus most of the Project construction areas would be obstructed from view from surrounding uses by fences, trees, hedges, and the existing on-site academic buildings, and the closest sensitive uses are approximately 800 feet away from the proposed improvements. With respect to nighttime glare, for the same reasons discussed previously for construction lighting, any such glare would be negligible. Therefore, the Project construction-related glare impact would be less than significant, and no mitigation measures are required.

Operation

During Project operation, the Project would introduce additional sources of light and glare typical of a small school campus and of existing light and glare sources at the Project Site, including interior, security, wayfinding, and parking lot lighting, and light and glare from additional motor vehicle traffic—no athletic field lighting or other high intensity lighting is proposed. In fact, exterior Project lighting would meet high energy efficiency requirements utilizing light-emitting diode (LED) or efficient fluorescent light technology which would limit Project light intensities. All Project exterior lighting would also be shielded and directed downward as mitigated herein, with Project lighting and exterior building materials complying with City light and glare requirements.

While two light-sensitive uses occur within the general vicinity of the Project Site, including Mulholland Drive¹² and the residential subdivision located approximately 800 feet west of the Project Site, views of on-site Project lighting from Mulholland Drive would be partially obscured by the existing on-site landscaping and street trees and by the proposed enhanced landscape buffer along the Project Site's Mulholland Drive frontage. In addition, views of most of the proposed Project improvements from both Mulholland Drive and the residential subdivision would be partially to fully obscured by the existing on-site academic buildings, and the lighting associated with any new light sources would attenuate with distance,

¹² While streets, such as Mulholland Drive, are not included in the classical definition of a light-sensitive use, as they do not have associated with them users that have expectations for darkness during nighttime hours, they are nevertheless conservatively considered a light-sensitive use in this analysis. This is because light and glare can interfere with the ability of drivers to see during nighttime and daytime hours, respectively.

especially with respect to the residential subdivision which is located approximately 800 feet away. For these same reasons, Project-related light trespass onto the adjacent properties would be minimal. Furthermore, interior Project lighting would be automatically controlled via photo sensors to illuminate only when occupied and to turn off during nighttime hours, and the proposed buildings would not include large expanses of glass or metal that could generate substantial daytime reflective per mitigation measures herein. For all these reasons, with the mitigations herein, Project-related light and glare impact would be less than significant.

Mitigation Measure AES-4: Light. Environmental Impacts to the adjacent residential properties may result in excessive illumination on the Project site. However, the potential impacts will be mitigated to a less than significant level by the following measure.

Outdoor lighting shall be designed and installed with shielding and directed downward to illuminate only the subject property, such that the light source cannot be seen from adjacent residential properties, the public right-of-way, nor from above. Uplighting shall be prohibited.

Mitigation Measure AES-5: Glare. Environmental impacts to the adjacent residential properties may result from glare from the proposed project. However, the potential impacts will be mitigated to a less than significant level by the following measure.

- The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.
- All exterior windows shall be low-reflective, non-glare glass.
- All exterior lighting fixtures shall be shielded and directed downward to illuminate only the Project property. Uplighting shall be prohibited.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

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

No Impact. As indicated previously, the Project Site is located in the Santa Monica Mountains, which is a largely semi-urbanized area dominated by undeveloped hillsides and ridgetops with some of the flatter areas developed with urban uses along Mulholland Drive and other major streets that bisect the area. As discussed in Section 3, Project Description, of this MND, the Project Site is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping. In addition, while the Project Site abuts an undeveloped Prominent Ridge to the south and east, it is otherwise surrounded by urban uses, including Bel Air Presbyterian Church to the north (across Mulholland Drive), Berkeley Hall School to the south (south of the Prominent Ridge), and Westland School and a large surface parking lot to the west. No agricultural uses or operations occur on or in the immediate vicinity of the Project Site. The Project Site and surrounding area are also not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency Department of Conservation.¹³ As such, the Project would not convert Farmland to a non-agricultural use. No impact would occur, and no mitigation measures are required.

¹³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

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

No Impact. The Project Site is zoned RE40-1-H (Residential Estate, Height District 1, Hillside Area) which permits a wide variety of uses including, but not limited to, single-family residential and accessory uses, as well as churches and private schools with a CUP.¹⁴ The Project Site is not zoned for agricultural use. Furthermore, none of the surrounding properties are zoned for agricultural use. The Project Site and surrounding area are also not enrolled under a Williamson Act Contract.¹⁵ Therefore, the Project would not conflict with existing zoning for agricultural uses or a Williamson Act Contract. No impact would occur, and no mitigation measures are required.

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

No Impact. As previously discussed, the Project Site is located in the Santa Monica Mountains within a semi-urbanized area developed with a mix of uses. The Project Site is currently developed with a school, including eight academic-related buildings, landscaping, and surface parking lots, and does not contain any forest land or timberland. In addition, the Project Site is currently zoned as RE40-1-H (Residential Estate, Height District 1, Hillside Area), which is intended for residential development as well as educational uses pursuant to approval of a CUP, and no adjacent parcels are zoned for forest land or timberland use.¹⁶ Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. No impact would occur, and no mitigation measures are required.

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

No Impact. As previously discussed, the Project Site is currently developed with a school and contains landscaping and undeveloped ruderal and disturbed hillside area, and no forest land abuts the Project Site. Therefore, the Project would not result in the loss or conversion of forest land to non-forest use. No impact would occur, and no mitigation measures are required.

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

¹⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁶ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

No Impact. As indicated previously, the Project Site is currently developed with a school, does not contain Farmland or forest land, and does not abut Farmland or forest land. Furthermore, the Project Site and surrounding area are not mapped as Farmland or forest land, are not zoned for Farmland or forest land, and do not abut land zoned for such uses.¹⁷ As such, the Project would not result in other changes that could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest uses. No impact would occur, and no mitigation measures are required.

III. AIR QUALITY

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

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

The analysis below is based, in part, on the air quality and GHG emissions worksheets and modeling output for the Project included as Appendix 2 of this MND.

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

Less Than Significant Impact. The Project Site is located within the 6,745-square-mile South Coast Air Basin (Basin), which includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The South Coast Air Quality Management District (SCAQMD) is the air pollution control agency for the Basin and is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Basin is in non-attainment (i.e., ozone [O₃], particulate matter [PM₁₀], and fine particulate matter [PM_{2.5}]). SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) is the regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP contains a comprehensive

¹⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment.¹⁸ With regard to future growth, SCAG has prepared the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS) which provides population, housing, and employment projections for cities under its jurisdiction. The growth projections in the 2016–2040 RTP/SCS are based in part on projections originating under County and City General Plans. These growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2016 AQMP.

The 2016 AQMP was adopted by the SCAQMD as a program to lead the Air Basin into compliance with several criteria pollutant standards and other federal requirements. It relies on emissions forecasts based on demographic and economic growth projections provided by SCAG's 2016–2040 RTP/SCS. SCAG is charged by California law to prepare and approve "the portions of each AQMP relating to demographic projections and integrated regional land use, housing, employment, and transportation programs, measures and strategies." Projects whose growth is included in the projections used in the formulation of the AQMP are considered to be consistent with the plan and not to interfere with its attainment. The SCAQMD recommends that, when determining whether a project is consistent with the current AQMP, a lead agency must assess whether the project would directly obstruct implementation of the plan and whether it is consistent with the demographic and economic assumptions (typically land use related, such as resultant employment or residential units) upon which the plan is based.

As described in detail in Section 3, Project Description, of this MND, the Project would include improvements to existing school buildings and the addition of new facilities totaling 22,508 square feet of new floor area with approximately 1.45 acres of ground disturbance. The Project would not include any residential uses that would directly or indirectly increase the population within and in the vicinity of the Project Site. In addition, as discussed above, it is expected that the Mirman School would increase school attendance from 330 to 430 students and on-site faculty and staff from 78 to 108 employees. This increase in students and employees would be well within the existing population and employment projections for the community and region and would be able to be accommodated by vacancies in the housing stock and new residential units currently being developed in the region. Furthermore, while the Project would generate part-time and full-time jobs associated with construction of the Project between the start of construction and Project buildout, these would be short-term opportunities and are employment positions that circulate throughout the region based on the construction site. Therefore, because the Project would result in a minimal increase in population and permanent employment, it would be consistent with the demographic projections set forth in SCAG's 2016–2040 RTP/SCS and which were used in the 2016 AQMP. Thus, the Project would not conflict with or obstruct implementation of the 2016 AQMP.

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. To achieve the goals of the Air Quality Element, performance-based standards have

¹⁸ SCAG serves as the federally designated metropolitan planning organization (MPO) for the southern California region.

been adopted by the City of Los Angeles to provide flexibility in implementation of its policies and objectives. The goal, objectives, and policies provided in the City's Air Quality Element applicable to the Project include the following:

- **Goal 1:** Good air quality and mobility in an environment of continued population growth and healthy economic structure.
- **Objective 1.1:** It is the objective of the City of Los Angeles to reduce air pollutants consistent with the Regional Air Quality Management Plan (AQMP), increase traffic mobility, and sustain economic growth citywide.
- **Objective 1.3:** It is the objective of the City of Los Angeles to reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.
- **Policy 1.3.2:** Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.
- **Policy 4.2.3:** Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.

As described in Section 3, Project Description, of this MND, the Project would add classroom and administrative space and improve existing buildings resulting in an increase of 100 students and 30 staff. The Project's location within an existing urban area would reduce per capita VMT and related vehicle emissions in comparison to a project located in a non-urban environment as discussed further in Checklist Section XVII, Transportation, and Appendix 14.1, Transportation Assessment, of this MND (including in the VMT Calculator run for the Project included as Appendix B of the Transportation Assessment).¹⁹ High population density would result in staff and students potentially living closer to the Project Site, reducing travel distances and overall VMT. In addition, the Project includes short- and long-term bicycle parking spaces for the proposed uses, would be developed in an urban area within close proximity to residential uses, and would retain the existing on-site EV and EV-ready parking, thereby facilitating a reduction in VMT as discussed in Checklist Section XVII and the Transportation Assessment. The Project would also include primary entrances for pedestrians and bicyclists that would be safe and easily accessible. As part of the Project, additional bicycle racks (i.e., 36 short-term and 4 long-term) would be installed, thereby further promoting the use of an alternative mode of transportation.

As shown in Table 4 and Table 5 in the analysis below, Project implementation would not exceed California or federal ambient air quality standards or thresholds. As the Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}), the Project would also not delay timely attainment of air quality standards or interim emission reductions

¹⁹ The Transportation Assessment was prepared by Gibson Transportation Consulting Inc. dated July 2020 and included as Appendix 14.1 of this MND. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (July 2019) and was approved by LADOT in their Transportation Impact Assessment Approval Letter dated August 14, 2020, included as Appendix 14.2 of this MND.

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

Emission Type	VOC ^b	NO _x	CO	SO _x	PM ₁₀ ^c	PM _{2.5} ^c
Regional Emissions						
2022	3	33	28	<1	3	1
2023	12	45	53	<1	3	2
Maximum Regional Emissions	12	45	53	<1	3	2
Regional Construction Daily Significance Threshold	75	100	550	150	150	55
Over/(Under)	(63)	(55)	(497)	(150)	(147)	(53)
Exceed Threshold?	No	No	No	No	No	No
Localized Emissions						
2022	3	25	26	<1	1	1
2023	12	44	50	<1	2	2
Maximum Localized Emissions	12	44	50	<1	2	2
Localized Significance Threshold^d	—	102	679		5	3
Over/(Under) Threshold	—	(57)	(629)		(3)	(1)
Exceed Threshold?	—	No	No	—	No	No
^a Compiled using the CalEEMod emissions model. The equipment mix and use assumption for each phase are provided in Appendix 2 of this MND. CalEEMod modeling outputs are also provided in Appendix 2 of this MND. Numbers may not add up exactly due to rounding. ^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably. ^c PM₁₀ and PM_{2.5} emission estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression. ^d The SCAQMD LSTs are based on Source Receptor Area No. 6 (West San Fernando Valley) for a 1.45-acre site (the Project's direct disturbance footprint) with a 25-meter receptor distance. The closest sensitive receptor is located approximately 130 feet west of the Project Site (i.e., Westland School, with Bel Air Presbyterian Church located further to the north and a residential subdivision located further [approximately 800 feet] to the west). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008. Source: Eyestone Environmental, August 2021; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.						

specified in the 2016 AQMP. In addition, the Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, the Project would not conflict with or obstruct implementation of the SCAQMD's AQMP. Impacts would be less than significant, and no mitigation measures are required.

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

Emission Type/Source	VOC ^b	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Operational Emissions						
Area	1	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	<1	<1	<1	<1	<1
Mobile	2	7	22	<1	9	3
Stationary (Emergency Generator)	<1	1	1	<1	<1	<1
Project Regional Emissions	4	9	23	<1	9	3
Regional Significance Threshold	55	55	550	150	150	55
Over/(Under)	(51)	(46)	(527)	(150)	(141)	(52)
Exceed Threshold?	No	No	No	No	No	No
Project Localized Emissions ^c	2	2	1	<1	<1	<1
Localized Significance Threshold ^d	—	102	679	—	2	1
Over/(Under) Threshold	—	(100)	(677)		(2)	(1)
Exceed Threshold?	—	No	No	—	No	No
<i>Note: Numbers may not add up exactly due to rounding</i> ^a Worksheets and modeling output files are provided in Appendix 2 of this MND. ^b CalEEMod calculates Volatile Organic Compounds (VOC) from architectural coatings and Reactive Organic Gases (ROG) from mobile sources. Both VOC and ROG are precursors to ozone so they are summed in the CalEEMod report under the header ROG. For purposes of comparing the ROG value to a VOC significance threshold, the terms can be used interchangeably. ^c Localized emissions include area, energy and stationary sources. ^d The SCAQMD LSTs are based on Source Receptor Area No. 6 (West San Fernando Valley) for a 1.45-acre site (the Project's direct disturbance footprint) with a 25-meter receptor distance. The closest sensitive receptors are located 130 feet west of the Project site (i.e., Westland School, with Bel Air Presbyterian Church located further to the north and a residential subdivision located further [approximately 800 feet] to the west). Please refer to SCAQMD Localized Significance Threshold Methodology, Appendix C, July 2008. Source: Eyestone Environmental, August 2021; SCAQMD, Final Localized Significance Threshold Methodology, July 2008.						

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

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including the monitoring stations nearest to the Project Site, which exceed the most stringent ambient air quality standard for ozone and particulate matter. The closest monitoring station is the SCAQMD Reseda station located at 18330 Gault Street in the City of Reseda, approximately 6 miles northwest of the Project Site. The Project would contribute to local and regional air pollutant emissions during construction (short-term) and Project occupancy (long-term). However, as demonstrated by the following analysis, construction and operation of the Project would

result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established within the SCAQMD CEQA Air Quality Handbook.²⁰

Construction

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

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs; (2) 100 pounds per day for NO_x; (3) 550 pounds per day for carbon monoxide (CO); (4) 150 pounds per day for sulfur oxides (SO_x); (5) 150 pounds per day for PM₁₀; and (6) 55 pounds per day for PM_{2.5}.²¹

Construction activities would include site preparation, grading, paving, building construction, and architectural coatings. Construction would occur over approximately 14 month period (e.g., approximately June 2022 through July 2023). Construction would require approximately 12,600 cy of total grading, including approximately 7,400 cy of cut, 5,200 cy of fill, and 2,200 cubic yards of total soil export. Details are provided in Appendix 2 of this MND.

Regional Impacts

Regional construction-related emissions associated with heavy construction equipment were calculated using the SCAQMD recommended California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Model results are provided in Appendix 2 of this MND. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust. A summary of unmitigated maximum daily regional emissions for Project construction is presented in Table 4, along with the regional significance thresholds for each air pollutant. As shown in Table 4, maximum unmitigated regional construction emissions would not exceed the SCAQMD regional significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. Thus, potential impacts associated with regional construction emissions would be less than significant, and no mitigation measures are required.

²⁰ SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/ceqa/hdbk.html, accessed January 31, 2020.

²¹ SCAQMD, Air Quality Analysis Guidance Handbook, www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook, accessed January 31, 2020.

Localized Impacts

The localized effects from on-site daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to SCAQMD's localized significance thresholds (LST) methodology, which uses on-site mass emissions rate lookup tables and Project-specific modeling, where appropriate.²² SCAQMD provides LSTs applicable to the following criteria pollutants: NO_x, CO, PM₁₀, or PM_{2.5}. SCAQMD does not provide an LST for SO₂ since land use development projects typically result in negligible construction and long-term operation emissions of this pollutant. Since VOCs are not a criteria pollutant, there is no ambient standard or SCAQMD LST for VOCs. Due to the role VOCs play in O₃ formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each source receptor area and can be used to determine whether or not a project may generate significant adverse localized air quality impacts. SCAQMD provides LST mass rate look-up tables for projects with active construction areas that are less than or equal to 5 acres. Although the Project Site is 5.46 acres (6.02 acres with the proposed LLA), the direct disturbance footprint would be only 1.45 acres. As a conservative assumption, localized thresholds for a 1.45-acre site were used to evaluate localized impacts as smaller sites would have more stringent thresholds. If a project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling be performed.

Estimates of maximum construction-related localized (on-site) daily emissions for NO_x, CO, PM₁₀, or PM_{2.5} are presented in Table 4. Based on the construction site acreage and distance to the closest off-site sensitive receptors, localized construction emissions thresholds were obtained from the LST look-up tables and are also listed in Table 4. With respect to air quality, the nearest non-residential sensitive receptor to Project construction activities is the Westland school located approximately 130 feet west of the Project Site. The nearest residential uses are single-family homes located along Corda Drive, approximately 800 feet to the west. As a conservative assumption, a 25-meter (80 feet) receptor distance was used to evaluate impacts at these receptors.²³ As presented in Table 4, construction-related daily maximum localized emissions would not exceed the SCAQMD daily significance thresholds for NO_x, CO, PM₁₀, or PM_{2.5}. Therefore, localized construction emissions resulting from the Project would result in less than significant short-term impacts, and no mitigation measures are required.

Operation

SCAQMD has established separate significance thresholds to evaluate potential impacts due to the incremental increase in criteria air pollutants associated with long-term operations. Regional operational emissions for the Project were calculated using CalEEMod. Inputs into the CalEEMod model include Project-related vehicle trips, as well as land uses and square footage to determine energy and water usage and waste generation. Mobile-source emissions were calculated within CalEEMod based on data from the VMT analysis included in the Transportation Assessment, Appendix 14.1 of this MND. The VMT

²² SCAQMD, LST Methodology Appendix C—Mass Rate LST Look-Up Table, October 2009.

²³ SCAQMD LST thresholds are given at 25, 50, 100, 200 and 500-meter increments.

analysis is based on the LADOT VMT Calculator methodology and contains trip generation and daily VMT for the Project. In addition, the proposed land uses would result in an increase in emissions generated by energy sources (e.g., natural gas combustion) and area sources (e.g., landscape fuel combustion, consumer products, and architectural coatings).

Regional Impacts

The results of the modeled emissions calculations are provided in Table 5, and CalEEMod model output files are provided in Appendix 2 of this MND. As indicated therein, the Project would result in an increase in criteria pollutant (VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}.) emissions which would fall below the SCAQMD daily significance thresholds for long-term regional emissions. Therefore, impacts associated with regional operational emissions would be less than significant, and no mitigation measures are required.

Localized Impacts

Operation of the Project would not introduce any major new sources of air pollution within the Project Site. Localized emissions estimates for criteria air pollutants from on-site sources are presented in Table 5. The SCAQMD LST mass rate look-up tables, which apply to projects that have active areas that are less than or equal to 5 acres in size, were used to evaluate potential localized impacts. As shown in Table 5, on-site localized operational emissions would not exceed any of the LSTs for NO_x, CO, PM₁₀, or PM_{2.5}.

Under existing conditions, CO levels in the Project area are substantially below the federal and state standards.²⁴ No exceedances of CO have been recorded at monitoring stations in the Basin for some time, and the Basin is currently designated as a CO attainment area for both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS). Air quality data from the SCAQMD Reseda monitoring station between years 2016–2018 indicate that the maximum CO levels in recent years are 3.4 ppm (1-hour average) and 2.5 ppm (8-hour average) compared to the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).²⁵

Localized areas where ambient concentrations exceed state and/or federal standards are termed CO hotspots. Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions. The potential for the Project to cause or contribute to CO hotspots was evaluated by comparing Project-impacted intersections (both intersection geometry and traffic volumes) with prior studies conducted by SCAQMD in support of their AQMP. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project-impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

²⁴ SCAQMD, "Historical Data by Year," www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed October 31, 2018.

²⁵ SCAQMD, "Historical Data by Year," www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed April 23, 2020. Reseda Monitoring Station.

SCAQMD recommends a hotspot evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by 2 percent or more at intersections with a level of service (LOS) of D or worse. Based on the traffic impact analysis prepared for the Project (refer to Response to Question VXI.a, below), no study intersections in the vicinity of the Project Site meet these criteria. Therefore, additional analysis was performed qualitatively.

SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, SCAQMD noted that the intersection of Wilshire Boulevard and Veteran Avenue was the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.²⁶ This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 in Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (1-hour average) and 3.2 ppm (8-hour average) at Wilshire Boulevard and Veteran Avenue.²⁷ When added to the existing background CO concentrations, the screening values would be 7.6 ppm (1-hour average) and 5.6 ppm (8-hour average), which are below the thresholds of 20 ppm (1-hour average) and 9.0 ppm (8-hour average).

At buildout of the Project, the Project is projected to have a net increase of only 234 daily trips as calculated by the City's VMT Calculator as discussed in Checklist Section XVII, Transportation, and Appendix 14.1, Transportation Assessment, of this MND. The addition of these trips to any of the nearest study intersections would not result in an average daily traffic volume anywhere near the volumes analyzed in the 2003 AQMP. Therefore, the Project does not trigger the need for CO hotspots modeling and would not cause any new or exacerbate any existing CO hotspots. As a result, impacts related to localized mobile-source CO emissions are considered less than significant.

Based on the above, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment under an applicable federal or state ambient air quality standard. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes or others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools (i.e., elementary, middle school, high schools); (7) parks and playgrounds; (8) child care centers; and (9) athletic fields. As discussed above, the nearest sensitive receptor with respect to air quality is the Westland School located approximately 130 feet west of the Project Site. Residential uses are located further away, approximately 800 feet west of the Project Site.

²⁶ SCAQMD, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

²⁷ The 8-hour average is based on a 0.7 persistence factor, as recommended by SCAQMD.

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

When considering potential air quality impacts under CEQA, consideration is given to the location of sensitive receptors within close proximity of land uses that emit toxic air contaminants (TACs). The California Air Resources Board (CARB) has published and adopted the Air Quality and Land Use Handbook: A Community Health Perspective (2005), which provides recommendations regarding the siting of new sensitive land uses near potential sources of air toxic emissions (e.g., freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities). SCAQMD adopted similar recommendations in its Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (2005). Together the CARB and SCAQMD guidelines recommend siting distances for both the development of sensitive land uses in proximity to TAC sources and the addition of new TAC sources in proximity to existing sensitive land uses. The Project would not include any sources of TACs such as generators, boilers or any other combustion sources. As the Project would not contain substantial TAC sources and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0, and potential TAC impacts would be less than significant.

The SCAQMD recommends Health Risk Assessments (HRAs) for substantial sources of diesel particulate matter such as warehouse distribution and cold storage facilities. No such facilities are located in proximity to the Project Site, and the Project does not propose any such uses. As such, a HRA was not required for the Project.

Based on the above, the Project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation measures are required.

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

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

With respect to Project operation, according to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve these types of uses as the Project would include the development of classroom and ancillary uses. On-site trash receptacles would also be contained, located, and maintained within trash enclosures in a manner that promotes odor control, and would not result in substantially adverse odor impacts.

Construction and operation of the Project would also comply with SCAQMD Rules 401, 402, and 403, regarding visible emissions violations.²⁸ In particular, Rule 402 provides that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.²⁹

Based on the above, the Project would not result in other emissions affecting a substantial number of people. Impacts would be less than significant, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

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

²⁸ SCAQMD, Visible Emissions, Public Nuisance, and Fugitive Dust, www.aqmd.gov/home/regulations/compliance/inspection-process/visible-emissions-public-nuisance-fugitive-dust, accessed January 31, 2020.

²⁹ SCAQMD, Rule 402, Nuisance, www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf, accessed February 3, 2020.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Unless otherwise indicated, the information in the analysis below is from the following technical reports: Biological Resources Assessment for the Mirman School Project prepared by GPA Consulting dated July 2021; and Arborist Report for the New Learning Center—The Mirman School for Gifted Children prepared by Kay J. Greeley dated July 14, 2021. These reports are included as Appendices 3 and 4, respectively, of this MND.

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

Less Than Significant Impact with Mitigation Incorporated. The Project Site is located in the Santa Monica Mountains with an area that includes both developed areas (mainly along Mulholland Drive and other major streets bisecting the mountains) and undeveloped areas (mainly along some of the ridges and associated slopes). As indicated in Figure 3, the Project Site is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping on a relatively flat terrace portion of the Project Site, with undeveloped hillside bisected by an emergency access road in the southern portion of the site and undeveloped hillside in the eastern portion. Land uses abutting the Project Site include: Mulholland Drive followed by the Bel Air Presbyterian Church to the north; an undeveloped ridge followed by Berkeley Hall School to the south; an undeveloped ridge designated as a Prominent Ridge by the Mulholland Scenic Parkway Specific Plan to the east; and Westland School and a parking lot owned by the Bel Air Presbyterian Church to the west followed by a vacant lot and then a residential subdivision.

To evaluate the potential impacts of the Project on biological resources, a Biological Resources Assessment was prepared and is included as Appendix 3 of this MND. The Biological Resources Assessment: (1) designates a Biological Study Area (BSA) within the Project Site as indicated in Figure 22 which represents the area that could be directly or indirectly impacted by the Project³⁰; (2) incorporates the findings of a literature review, including but not limited to searches of the California Natural Diversity Database (CNDDB), United States Fish and Wildlife Service (USFWS) list of species designated as threatened or endangered and designated critical habitat, and California Native

³⁰ The BSA includes the Mirman School campus, the proposed LLA area, and approximately 50 feet of hillside area on the east and south sides of the campus.



Figure 22
Biological Study Area

Plant Society (CNPS) Rare and Endangered Plant Inventory; (3) incorporates the findings of a biological field survey of the BSA; and (4) includes an impact analysis based on the above and identification of required mitigation measures.

As indicated in Figure 22, the majority of the BSA contains the existing developed portion of Mirman School and playfield; the only undeveloped areas are the hillsides in the eastern and southern portions of the BSA. As indicated in Figure 23, the cover classes in the BSA include developed area and ornamental landscape area (i.e., playfields and disturbed undeveloped area), with the only vegetation community consisting of ruderal³¹ vegetation on the eastern hillside. The property was completely graded and scaped between 1967 and 1977, and was subsequently planted; therefore, the existing on-site vegetation is not natural. No watercourses and no jurisdictional features (i.e., waterways, wetlands, and riparian area under United States Army Corps of Engineers [USACE] or CDFW jurisdiction) occur within the BSA.

Trees within the BSA could provide nesting habitat for migratory birds and roosting habitat for bats. In addition, clay roof tiles on campus structures within the BSA could also provide roosting habitat for bats. Also, the state candidate mountain lion may use the adjacent hillsides for local movement and foraging (although no signs of mountain lion, including tracks, scat, or marking signs, were observed during the biological field survey). Wildlife species observed during the survey include Anna's hummingbird (*Calypte anna*), lesser goldfinch (*Spinus psaltria*), western fence lizard (*Sceloporus occidentalis*), and Cooper's hawk (*Accipiter cooperii*). Based on the records searches, the biological field survey, and the ranges of special-status natural communities, plant and wildlife species: (1) nine special-status natural communities have the potential to occur in the BSA, although no such communities were observed during the biological field survey and no such communities are expected to be in the BSA; (2) 63 special-status plant species have the potential to occur in the BSA, although no such plant species were observed during the biological field survey, the BSA does not have suitable habitat for such plant species, and no such plant species are expected to be in the BSA; and (3) 104 special-status wildlife species have the potential to occur in the BSA, and based on habitat requirements, seven such wildlife species have the potential to occur in the BSA, including the pallid bat (*Antrozous pallidus*), western mastiff bat (*Eumops perotis californicus*), silver-haired bat (*Lasionycteris noctivagans*), hoary bat (*Lasiurus cinereus*), Cooper's hawk (*Accipiter cooperii*), sharp-shinned hawk (*Accipiter striatus*), and mountain lion (*Puma concolor*). However, Cooper's hawk was the only special-status species observed in the BSA during the biological field survey.

Given that there are no jurisdictional features, no special-status natural communities, and no special-status plant species within the BSA, the Project would have no impact on these biological resources and no mitigation measures are required for these resources. However, Project construction activities, including vegetation removal, could result in direct impacts on migratory birds protected under the Migratory Bird Treaty Act and raptors (i.e., Cooper's hawk and sharp-shinned hawk) if they were to be nesting in and/or adjacent to the BSA, and indirect impacts (i.e., noise, vibration, dust, and human activity) to these bird species by disrupting nesting or foraging. In addition, tree removal and/or modification of the existing on-site buildings could result in direct impacts to special-status bat species if they were roosting in

³¹ Ruderal communities are typical in early successional stages following extreme human disturbance, or recurrent natural disturbance. The on-site ruderal community is comminated by annual and perennial, introduced/non-native, pioneering, herbaceous plants that readily colonize disturbed ground.

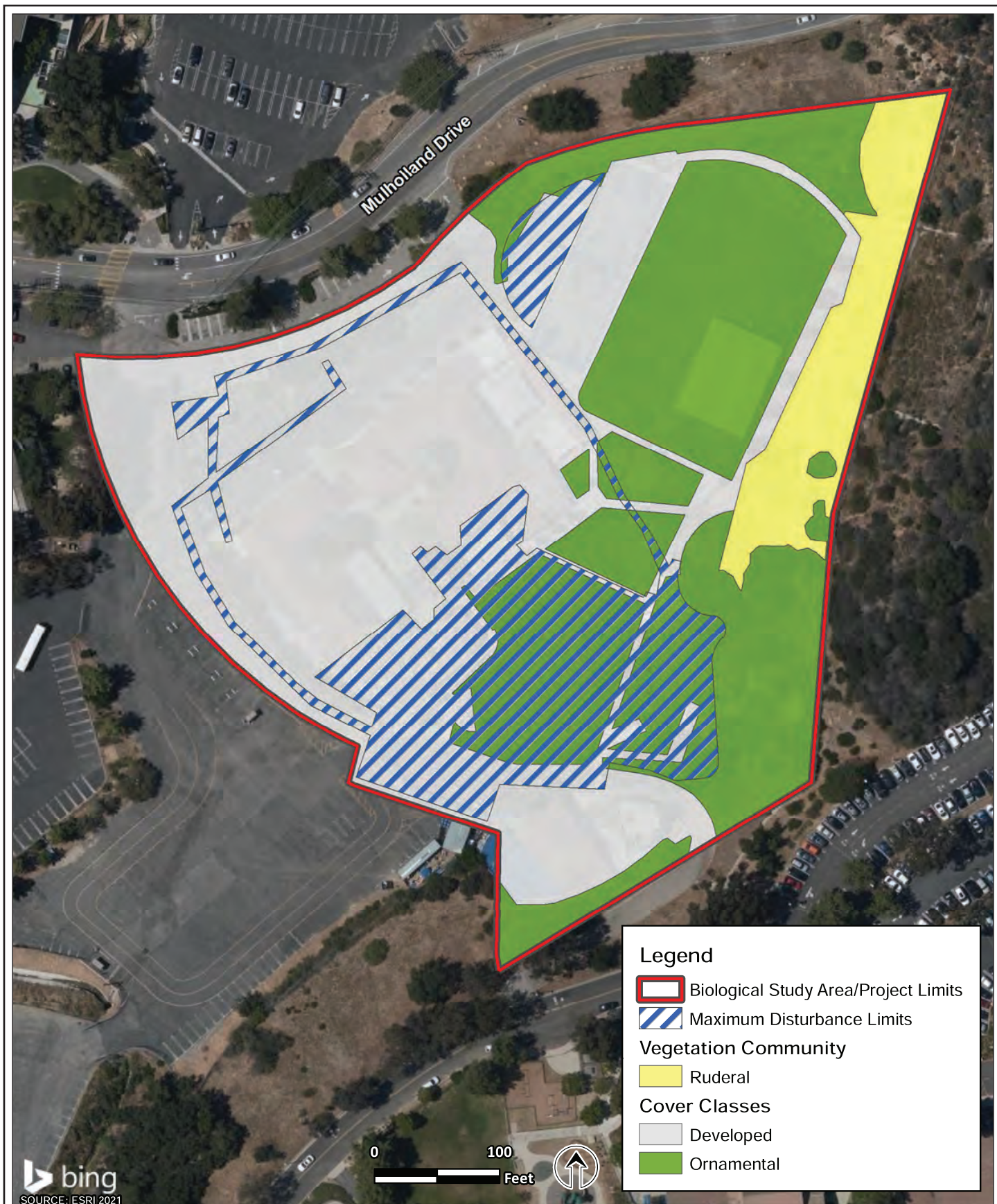


Figure 23
Vegetative Community and Cover Classes

the trees or buildings to be modified, and indirect impacts could occur causing roost abandonment. Lastly, while the mountain lion is mostly nocturnal and not expected to be in the construction area during the day, this species could potentially use the adjacent undeveloped hillsides for movement and foraging during construction which could result in indirect impacts to the mountain lion (i.e., interfere with foraging and movement). Therefore, the following mitigation measures are proposed for migratory birds and raptors, bats, and mountain lion:

Mitigation Measure BIO-1: To mitigate potential impacts on migratory birds and raptors, the following measures shall be implemented:

- Trimming and removal of trees and vegetation shall be minimized and performed outside of the bird nesting season (typically February 1 to September 15), to the extent feasible.
- In the event trimming or removal of trees and vegetation must be conducted during the bird nesting season, nesting bird surveys shall be completed within 300 feet (for birds) and 500 feet (for raptors) of the construction area by a qualified biologist no more than 48 hours prior to trimming or removal activities to determine if nesting birds are within the affected vegetation. Nesting bird surveys shall be repeated if trimming or removal activities are suspended for five days or more.
- In the event construction is scheduled during bird nesting season, nesting bird surveys shall be completed no more than 48 hours prior to construction to determine if nesting birds and active nests are in or within 500 feet of the construction area. Surveys will be repeated if construction activities are suspended for five days or more.
- In the event nesting birds are found within 500 feet of the construction area during the nesting bird survey, appropriate buffers (typically 300 feet for songbirds and 500 feet for raptors) as determined by a qualified biologist, shall be implemented, to ensure that nesting birds and active nests are not harmed. Buffers shall include fencing or other barriers around the nests to prevent any access to these areas and shall remain in place until birds have fledged and/or the nest is no longer active, as determined by a qualified biologist.

Mitigation Measure BIO-2: To avoid and/or minimize impacts on bats, the following measures shall be implemented:

- Where feasible, tree removal shall be conducted in October, which is outside of the maternal and non-active seasons for bats.
- Prior to construction and during the summer months, a thorough bat roosting habitat assessment shall be conducted of all trees and structures within 100 feet of the construction area. If potential for bat roosting is identified, evening emergence surveys shall be conducted, during the maternity season if feasible, to assess the presence of roosting bats. If presence is detected, a count and species analysis shall be completed to help assess the type of usage.
- If presence is detected, no fewer than 30 days prior to construction, and during the non-breeding and active season (typically October), bats shall be safely evicted from any identified roosts to be impacted by the Project under the direction of a qualified biologist. Once bats have been safely evicted, exclusionary devices shall be installed and monitored to prevent bats from

returning and roosting in these areas prior to removal. Roosts that would not be impacted by the Project shall be left undisturbed.

- If the presence or absence of bats cannot be confirmed in potential roosting habitat, a qualified biologist shall be onsite during habitat removal or disturbance of this area. If the biologist determines that bats are being disturbed during this work, work shall be suspended until bats have left the vicinity on their own or can be safely excluded under direction of the biologist. Work shall resume only once all bats have left the site and/or approval to resume work is given by a qualified biologist.
- If a maternal colony of bats is found, a buffer shall be installed around the roost, and no work shall be conducted within the buffer area until the maternal season is finished or the bats have left the site, or as otherwise directed by a qualified biologist. The buffer distance shall be established under direction of a qualified biologist based on an analysis of ambient noise levels, expected construction noise levels, and the location and type of roost site. The buffer area shall be designated as an ESA and protected as such until the bats have left the site. No activities shall be authorized within the buffer unless authorized in advanced by the qualified biologist.

Mitigation Measure BIO-3: To mitigate potential impacts on mountain lion, all construction activities shall be conducted during daylight hours, and no construction activities shall be conducted at night.

With the implementation of Mitigation Measures BIO-1 through BIO-3, the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the impact would be less than significant with mitigation incorporated.

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

No Impact. As previously indicated, the Project Site is located in the Santa Monica Mountains within an area that includes both developed areas (mainly along Mulholland Drive) and undeveloped areas (mainly along some of the ridges and associated slopes). The Project Site is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping. According to the USEPA NEPA Assist website and the City of Los Angeles Biological Resources Area Map—Metro Area, no watercourses, National Wetlands Inventory (NWI) wetlands, riparian area, or other sensitive natural community exist on the Project Site.^{32,33} Also, according to the Biological Resources Assessment included as Appendix 3 of this MND, no watercourses and no jurisdictional features (i.e., waterways, wetlands, and riparian area under USACE or CDFW jurisdiction) occur within the BSA. In addition, the Project Site is not located in or adjacent to a Biological Resource Area or Significant

³² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed April 9, 2020.

³³ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed April 9, 2020.

Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{34,35} Furthermore, there are no other sensitive natural communities identified by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service on the Project Site.^{36,37,38} Lastly, the Project improvements are proposed largely within the existing development footprint of the school rather than in undisturbed areas with natural habitat (for example, the proposed Learning Center building is proposed at the site of an existing school playfield, the proposed Library expansion is proposed as the extension of the second story of the Library, and the proposed storage/trash/recycling enclosure is proposed largely within the existing Church parking lot portion of the proposed LLA). Therefore, the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. No impact would occur, and no mitigation measures are required.

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

No Impact. As previously described, the Project Site is located in the Santa Monica Mountains within an area that includes both developed areas (mainly along Mulholland Drive) and undeveloped areas (mainly along some of the ridges and associated slopes). The Project Site is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping. With the exception of the north and west facing slopes of a Prominent Ridge located immediately south and east of the Project Site, and an open space parcel west of Westland School, the surrounding area is largely developed and comprised of residential, educational and church uses. No water bodies or federally protected wetlands as defined by Section 404 of the Clean Water Act exist on the Project Site.³⁹ Furthermore, the Project improvements are proposed largely within the existing development footprint of the school rather than in undisturbed areas with wetlands, marshes and/or vernal pools (for example, the proposed Learning Center building is proposed at the site of an existing school playfield, the proposed Library expansion is proposed as the extension of the second story of the Library, and the proposed storage/trash/recycling enclosure is proposed largely within the existing Church parking lot portion of the proposed LLA). Lastly, as indicated previously, no jurisdictional features (i.e., waterways, wetlands, and riparian area under USACE or CDFW jurisdiction) occur on the Project Site or within the BSA. As such, the Project would not have an adverse effect on federally protected wetlands. No impact would occur, and no mitigation measures are required.

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

³⁴ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, Biological Resources Area Map—Metro Area.

³⁵ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

³⁶ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed April 9, 2020.

³⁷ California Department of Fish and Wildlife, CDFW Lands, www.wildlife.ca.gov/Lands, accessed April 9, 2020.

³⁸ U.S. Fish and Wildlife Service, National Wetlands Inventory, www.fws.gov/wetlands/index.html, accessed April 9, 2020.

³⁹ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed April 9, 2020.

Less Than Significant Impact with Mitigation Incorporated. According to the Biological Resources Assessment included as Appendix 3 of this MND, wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. A functional wildlife corridor allows for ease of movement between habitat patches. Corridors are important in preventing habitat fragmentation. Habitat fragmentation is typically caused by human development and can isolate wildlife populations, which leads to a decrease in genetic diversity and increases the risk of extirpations. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife movement. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations.

As described above, the Project Site is located in the Santa Monica Mountains within an area that includes both developed areas (mainly along Mulholland Driven the other major streets bisecting the mountains) and undeveloped areas (mainly along some of the ridges and associated slopes). The Project Site is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping. Also, with the exception of the north and west facing slopes of a Prominent Ridge located immediately south and east of the Project Site, and an open space parcel west of Westland School, the areas surrounding the Project Site are developed. In addition, no watercourses or riparian threads that could serve as wildlife corridors bisect the Project Site or BSA.^{40,41,42} Furthermore, the Project Site is not located in or adjacent to a Biological Resource Area or Significant Ecological Area as defined by the City of Los Angeles or County of Los Angeles.^{43,44} Furthermore, as indicated previously, the proposed improvements would be largely located within the existing development footprint of the school, and the developed portion of the campus is already surrounded by an existing perimeter fence. Lastly, according to the California Department of Fish and Wildlife BIOS Habitat Connectivity Viewer, the Project Site is not within an essential connectivity area.⁴⁵ Hence, the Biological Resources Assessment concludes that the BSA is not expected to be used for regional wildlife movement. Nevertheless, the Biological Resources Assessment concludes that: (1) the undeveloped hillsides in and adjacent to the eastern and southern portions of the Project Site are likely used as travel corridors for local wildlife movement, including potentially by mountain lion during nighttime hours; and (2) Project construction activities conducted adjacent to the hillsides could generate noise, vibration and light that indirectly affects mountain lion movement within the hillsides. However, the Biological Resources Assessment concludes that implementation of Mitigation Measure BIO-3 would avoid this impact.

⁴⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁴¹ U.S. Environmental Protection Agency, NEPAassist, www.epa.gov/nepa/nepassist, accessed January 2, 2019.

⁴² GPA Consulting, Biological Resources Assessment for the Mirman School Project, July 2021,

⁴³ City of Los Angeles, Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, January 19, 1995, P. 2-18-4.

⁴⁴ Los Angeles County, Los Angeles County General Plan, Figure 9.3 Significant Ecological Areas and Coastal Resource Areas Policy Map, October 6, 2015.

⁴⁵ California Department of Fish and Wildlife, Biogeographic Information and Observation System (BIOS), www.wildlife.ca.gov/Data/BIOS, accessed January 2, 2019.

The Project Site contains existing trees, hedges, and shrubs. As indicated in the Arborist Report included in Appendix 4 of this MND, 78 existing trees were inventoried within the study area,⁴⁶ including 73 trees on the Project Site, three off-site trees that overhang the Project Site, and two off-site trees that do not overhang the Project Site, as indicated in Figure 10. As part of the Project, 19 trees would be removed and 18 trees would be encroached upon. These trees could potentially provide nesting sites and/or movement routes for special status migratory birds protected under the Migratory Bird Treaty Act. However, the Project would replace any non-protected trees to be removed on a 1:1 or greater basis and would replace the one potential street tree to be removed (if determined to be within the public ROW and thus a street tree) on a 4:1 or greater basis in conformance with current Urban Forestry Division policies and subject to approval by the City's Board of Public Works. Furthermore, with implementation of Mitigation Measure BIO-1 identified previously, the Project would avoid the removal of trees used by migratory birds and raptors during the nesting season.

Based on the above, with implementation of Mitigation Measures BIO-1 and BIO-3 above and BIO-5 later in this section, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Therefore, the impact would be less than significant with mitigation incorporated.

Mitigation Measures BIO-1, BIO-2, and BIO-5 (below)

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

Less Than Significant Impact with Mitigation Incorporated. The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, toyon trees, and California Bay trees of at least four inches in diameter at breast height as well as Mexican elderberry. These tree species are defined as "protected" by the City of Los Angeles. Trees that have been planted as part of a tree planting program may possibly be exempt from the ordinance as determined by the Department of Urban Forestry, Board of Public Works.

As indicated in Figure 10 and in the Arborist Report included in Appendix 4 of this MND, there are 78 existing trees within the Arborist Report tree survey study area, including 73 trees on the Project Site, three off-site trees that overhang the Project Site, and two off-site trees that do not overhang the Project Site.⁴⁷ The 78 trees within the Arborist Report tree survey study area include: eight protected trees (e.g., two California sycamores, four coast live oaks, and two Mexican elderberry); 25 young California

⁴⁶ As defined in the Arborist Report, the study area for the tree survey was the Project Site, the right-of-way in front the Project Site, protected trees that overhang the Project Site, and off-site mature trees that would be impacted by the Project.

⁴⁷ As defined in the Arborist Report, the study area for the tree survey was the Project Site, the proposed LLA area, the right-of-way in front the Project Site, protected trees that overhang the Project Site, and off-site mature trees that would be impacted by the Project.

sycamores planted in 2015 as part of the school's campus improvements (pending determination by the Urban Forestry Division);⁴⁸ and 45 other mature unprotected trees.

According to the Arborist Report, a total of 19 trees will be removed, and 18 trees will be impacted by construction. Project construction activities (excavations, etc., although not actual development) could potentially encroach upon the drip zones of 18 on-site trees to be retained.

One existing non-protected tree (shamel ash) to be removed along the Project Site's northern boundary could potentially be determined to be a City street tree; should that determination be made, this tree would be removed and replaced on a 4:1 or greater basis pursuant to the regulations of the City's Urban Forestry Division and following approval by the City's Board of Public Works.

Finally, the Arborist Report discusses additional protected trees in the public right-of-way. These trees are identified as being outside of the construction area.

However, the Project would replace the unprotected trees to be removed on a 1:1 or greater basis consistent with current City policy, with the unprotected tree on the northern border of the Project Site to be replaced on a 4:1 or greater basis in conformance with current Urban Forestry Division policies and subject to approval of the City's Board of Public Works if that tree is determined to be within the public right-of-way. Any other trees determined to be protected per the Protected Tree Ordinance, and proposed and approved for removal, will be replaced pursuant to Ordinance regulations. With implementation of Mitigation Measures BIO-4 through BIO-8 below, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Hence, the impact would be less than significant with mitigation incorporated.

Mitigation Measure BIO-4. Tree Encroachment: The following guidelines shall be followed to establish and maintain a healthy environment for trees in the vicinity of or impacted by construction to be retained under the Project.

Work Within the Critical Root Zone

The critical root zone is an area surrounding a tree and varies by tree age, size and species. Great care must be taken when work is conducted within the critical root zone. Given the high sensitivity of most trees, great care must be taken when work is conducted within the critical root zone. Specifically:

- Observation—All work conducted within the critical root zone of a tree to be preserved should be performed within the presence of a qualified arborist. This would help to ensure that work is performed in a manner that would not harm the tree.
- Notice—Forty-eight hours' notice should be provided to the arborist prior to the planned start of work. The notice would ensure that the project receives the highest possible scheduling priority and avoid delays.

⁴⁸ As described in the Arborist Report, the 25 young California sycamores planted in 2015 as part of the school's campus improvements may not considered protected by the City's Protected Tree Ordinance as they are non-native to the Project Site. This will be determined to the satisfaction of the Department of Urban Forestry, Bureau of Public Works.

- **Hand Tools**—All work within the critical root zone of a tree should be accomplished with the use of hand tools only. Except under special circumstances, tractors, backhoes and other vehicles cannot be operated in a manner that would preserve major tree roots, minimize soil compaction, and insure the safety of both the vehicle operator and the tree.
- **Certification**—All work conducted within the critical root zone should be certified by a qualified arborist.

Work Outside of the Critical Root Zone

To protect trees within the vicinity of major construction, trees should be temporarily fenced at the edge of the dripline prior to the beginning of construction operations on a site. The fence should be constructed of orange safety fencing hooked to t-posts. The fence may be removed at the completion of the construction upon approval by the project arborist.

Planting Within the Critical Root Zone

Planting within the critical root zone of most trees is discouraged, especially native trees. Ideally, the leaf litter from the tree should be allowed to collect beneath the tree, creating a natural mulch and fertilizer. If planting is necessary or the natural leaf litter is removed, the following should be considered:

- **Plant Material**—Drought tolerant plantings should be utilized where possible. All plantings around oak trees should be compatible with native oak trees. A good reference for compatible plant material is *Compatible Plantings Under and Around Oaks* by the California Oak Foundation.
- **Irrigation**—No spray-type irrigation systems should be used within the dripline. It is important that sprinkler systems do not throw water against the trunk of any tree. A continuously wet soil condition near the root crown, the area where the tree trunk meets the ground, favors the growth of predatory disease organisms. The two most prominent organisms in Southern California are avocado root rot (*Phytophthora cinnamomi*) and oak root fungus (*Armillaria mellea*). As an absolute minimum, all spray irrigation should be kept at least 15 feet from the trunk.
- **Resistant Varieties**—Avoid plants that are susceptible to either avocado root rot or oak root fungus. Oak trees are particularly susceptible to these diseases in developed areas. Avoiding other plants susceptible to these diseases would also help to keep the diseases in a dormant state. Consult publications by the University of California Cooperative Extension for plant lists.
- **Mulch**—Place a four-inch thick layer of organic mulch throughout the protected zone of each tree. Aesthetically pleasing options include crushed walnut hulls and shredded bark. These mulches are beneficial when the natural leaf litter is not available, minimizing evaporation and providing weed control.

Tree Maintenance and Pruning Operations

Most trees require very little pruning, except for periodic deadwooding and clearance for safety. However, if a tree has a major defect, the employment of proper pruning practices may be more desirable than the uncontrolled damage that could otherwise occur. Always consult qualified professionals for advice.

- **Ornamental or Aesthetic Pruning**—Removal of live tissue for the purpose of altering the appearance of trees is not desirable. Activities such as thinning out, heading up, or other similar practices contribute to the onset of insect and disease attacks.

- **Deadwooding**—Removal of dead tissue, regardless of size, may usually be performed at any time. All pruning should follow standards endorsed by the International Society of Arboriculture.
- **Other Pruning Operations**—Branches that are unsafe due to decay, cavities, cracks, physical imbalance, fire damage, disease, or insects should be referred to a qualified arborist for inspection, especially if the branches exceed two inches in diameter.
- **Cavities and Hollows**—Cavities and hollows should be kept free of loose debris. Some contain decayed wood; these should generally be referred to a qualified arborist for treatment. Concrete or other materials should not be used to seal or fill in cavities or hollows. These materials create a haven for diseases and insects over time. Openings may be covered with screening to prevent debris build-up.
- **Wound Seal**—Pruning wounds should generally not be sealed with any type of compound. Over time, these materials crack and create entry points for disease and insects. A proper pruning cut would heal naturally over a short period of time.

Watering and Fertilization

Winter rains should be sufficient to provide the water needed for California native trees in natural areas. Trees in landscaped areas would usually receive enough water from adjacent plantings. If you suspect that a tree needs supplemental water, contact a qualified arborist for advice.

- **Watering**—If supplemental water is required, use a water probe, such as a “Ross Root Feeder” to apply the water. Alternatively, a low volume soaker hose could be utilized. Apply the water at various locations, just outside the dripline of the tree. A total of 15 to 20 hours of low volume application should suffice. Repeat this watering cycle every one to two months as needed. Water should generally not be applied in the summer, as most oak trees are dormant and cannot accept the water.
- **Fertilization**—Fertilizer can be applied along with the water. A total of 0.75 pound of actual nitrogen per inch of trunk diameter per year is a basic rule-of-thumb. However, ask a local certified nurseryman for a specific recommendation and follow the manufacturer’s directions carefully. Over-fertilization can be deadly.
- **Aeration**—Ventilation of the root system can be very beneficial in areas where soil has been compacted. Hand dig holes six inches in diameter to a depth of two feet. Do not cut any roots in excess of one inch in diameter. Dig the holes two feet on center, in concentric circles around the trunk, throughout the dripline. If possible, add holes outside of the dripline. Fill the holes with an organic matter. If leaf litter is not available, a mixture such as 50 percent “Kellogg’s Nitrohumus” and 50 percent nitrolized redwood shavings would be beneficial. This organic matter would be decomposed, producing a year-round source of fertilizer for the oak tree.

Diseases and Insects

Effective pest control starts with observation by the property owner. Changes, such as abnormal leaf drop, oozing sap, and discolored or dying leaves indicate that something has changed and expert inspection is required. Homeowners should be very careful when using pesticides around an oak tree. Herbicides should never be utilized within one hundred feet of California native trees, unless applied by a

certified pesticide applicator. Misuse of these compounds can lead to the death of beneficial organisms or even to the death of the tree.

Grade Changes

Any change to the grade at the root crown of tree can have a negative impact. As little as six inches can lead to the death of the tree. Drainage patterns should be maintained to prevent water from flowing and ponding at the base of a tree. If fill soil exists, use a shovel to remove the excess soil. The flare at the root crown should just be visible.

Inspection

All trees should be inspected on a periodic basis by a qualified arborist. The inspection basis should be determined by the relative hazard value of the tree. For example, trees surrounding a high-use business should be inspected on a quarterly basis, whereas trees located within a low-use open space might only require bi-annual inspection. It is the responsibility of the property owner to establish and implement an appropriate inspection schedule upon the recommendation provided by the project arborist.

Mitigation Measure BIO-5. Tree Removal (Non-Protected Trees). Environmental impacts from project implementation may result due to the loss of significant trees on the site. However, the potential impacts will be mitigated to a less than significant level by the following measures.

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal shall be replaced at a 1:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division the Department of Public Works, Bureau of Street Services.

Mitigation Measure BIO-6. Tree Removal (Street Trees)

- Removal of street trees (i.e., trees in the public right-of-way) requires approval by the Board of Public Works.
- The required Tree Report shall include the location, size, type, and condition of all existing trees in the adjacent public right-of-way and shall be submitted for review and approval by the Urban Forestry Division of the Bureau of Street Services, Department of Public Works (213-847-3077).
- All trees in the public right-of-way shall be provided per the current Urban Forestry Division standards.

Mitigation Measure BIO-7. Locally Protected Species. Environmental Impacts may result due to the loss of protected trees on the site. However, these potential impacts will be mitigated to a less than significant level by the following measures.

- All protected tree removals require approval from the Board of Public Works.
- A Tree Report shall be submitted to the Urban Forestry Division of the Bureau of Street Services, Department of Public Works, for review and approval (213-847-3077), prior to implementation of the Report's recommended measures.
- A minimum of four trees (a minimum of 48-inch box in size if available) shall be planted for each protected tree that is removed. The canopy of the replacement trees, at the time they are planted, shall be in proportion to the canopies of the protected tree(s) removed and shall be to the satisfaction of the Urban Forestry Division.
- The location of trees planted for the purposes of replacing a removed protected tree shall be clearly indicated on the required landscape plan, which shall also indicate the replacement tree species and further contain the phrase "Replacement Tree" in its description.
- Bonding (Tree Survival):
 - a. The applicant shall post a cash bond or other assurances acceptable to the Bureau of Engineering in consultation with the Urban Forestry Division and the decision maker guaranteeing the survival of trees required to be maintained, replaced or relocated in such a fashion as to assure the existence of continuously living trees for a minimum of three years from the date that the bond is posted or from the date such trees are replaced or relocated, whichever is longer. Any change of ownership shall require that the new owner post a new oak tree bond to the satisfaction of the Bureau of Engineering. Subsequently, the original owner's oak tree bond may be exonerated.
 - b. The City Engineer shall use the provisions of Section 17.08 as its procedural guide in satisfaction of said bond requirements and processing. Prior to exoneration of the bond, the owner of the property shall provide evidence satisfactory to the City Engineer and Urban Forestry Division that the oak trees were properly replaced, the date of the replacement and the survival of the replacement trees for a period of three years.

Mitigation Measure BIO-8. California Sycamore Trees. According to the applicant, 25 California sycamore trees were planted by the applicant in 2015-2016. To determine the protected status of these trees, the following measures are required.

- Prior to the issuance of any grading, demolition, or construction permits, the 25 California sycamore trees located on the subject site will be evaluated by the Department of Public Works, Bureau of Urban Forestry.
- The 25 California sycamores will be reviewed by the Department of Public Works, Bureau of Urban Forestry to determine whether the trees are protected or non-protected.
- The applicant will provide all documentation required by Urban Forestry, Board of Public Works showing the dates the trees were planted.
- If these trees are determined to be protected by the Department of Public Works, Bureau of Urban Forestry, Mitigation Measure BIO-7 above shall apply.

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

No Impact. The Project would occur on a site that has been previously developed, graded, and used for educational and accessory uses for decades. The Project Site is not subject to a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans.⁴⁹ Therefore, the Project would not conflict with the provisions of such plans. No impact would occur, and no mitigation measures are required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The following analysis is based, in part, on the Tribal Cultural Resources (TCR) Report prepared for the Project by Dudek dated June 2020 and included as Appendix 15 of this MND;. All specific information on cultural resources in the discussion below is from the TCR Report, unless otherwise indicated. For an analysis of Project impacts to tribal cultural resources, see Checklist Section XVIII, Tribal Cultural Resources, of this MND. The information and conclusions below also apply to the Alternative LLA Scenario which would be developed within the area of disturbance of the Project and result in slightly less impacts owing to the development of a smaller storage/trash/recycling enclosure, seating area and shade structure than under the Project which would slightly reduce the maximum area of disturbance of the Project shown in Figure 15.

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

No Impact. The term “historical resource” includes, but is not limited to, “any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California” (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) “to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered

⁴⁹ California Department of Fish and Wildlife, California Regional Conservation Plans, October 2017.

historically significant if it: (i) retains “substantial integrity”; and (ii) meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

Section 15064.5 of the CEQA Guidelines generally defines a historic resource as a resource that is: (1) listed in, or determined to be eligible for listing in, the CRHR; (2) included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code); or (3) identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code). Additionally, any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources.

The Project Site is currently developed with eight academic buildings, vehicular and bicycle parking, play fields/courts, courtyards, and landscaping. The three largest on-site academic buildings were developed in 1971, with gym, storage room, classroom and library additions constructed in 1975 and 1981, while according to ZIMAS, additional smaller on-site buildings/structures were constructed between 1991 and 1993.⁵⁰ Construction permits for the two Upper Campus academic buildings were issued in 1994, and Certificates of Occupancy were issued for these buildings in 1996. The three academic buildings constructed in 1971 would be 50 years in age at the time of Project construction and thus would meet one of several criteria required for being considered historically significant under PRC Section 5024.1(c)(1-4).

⁵⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

However, the Project's proposed construction activities would result in the expansion of the library addition originally constructed in 1981 and subsequently expanded in 2008, as well as the construction of the new Learning Center that would not involve the demolition or alteration of any existing campus building. In addition, a search of the California Historical Resources Information System at the South Central Coastal Information Center (SCCIC) (included as Appendix A of the TCR Report which is included as Appendix 15 of this MND, and further discussed in Checklist Section XVIII, Tribal Cultural Resources, of this MND) indicates that no designated historic resources occur on or immediately adjacent to the Project Site, and no Los Angeles Historic-Cultural Monuments (HCMs) occur on the Project Site.⁵¹ Furthermore, ZIMAS indicates that the Project Site is not located within a historic district and that the existing on-site structures do not require historic preservation review.⁵² Moreover, none of the Project Site buildings have been identified as potential historic resources on SurveyLA, the Citywide historic resources survey performed by the City's Office of Historic Resources.⁵³ Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5, and no impacts to historical resources would occur.

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

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

The 5.46-acre Project Site (6.02 acres with the proposed LLA) is currently developed with eight existing educational buildings, play fields/courts, surface parking, and landscaping, and includes undeveloped hillsides in the southern and eastern portions. The Project improvements are proposed largely within the existing development footprint of the school, which has been previously graded and disturbed (such as the existing playfield where the new Learning Center building is proposed). In addition, the SCCIC and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) records searches conducted for the Project (included as Appendices A and B, respectively, of the TCR Report which is included as Appendix 15 of this MND) indicate that no prehistoric or historic archaeological sites have been previously recorded on or within 0.5 mile of the Project Site. Furthermore, fill ranging between 7 and 34 feet bgs underlies the relatively flat terrace portion of the Project Site where the existing and Project improvements are proposed,⁵⁴ which, along with the past disturbance of the site, support the TCR Report's conclusion that soils with the potential to support the presence of buried archaeological resources are unlikely to have persisted. Nevertheless, the Project would require grading and excavations of up to approximately

⁵¹ According to the SCCIC Records search, the closest historical resources is the Sepulveda Tunnel under Mulholland Drive located approximately 750 feet to the east.

⁵² City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁵³ City of Los Angeles Department of City Planning Office of Historic Resources, SurveyLA Historic Resources Survey Report, Brentwood–Pacific Palisades Community Plan Area, [https://planning.lacity.org/odocument/e4a918f7-e513-4e69-9ec4-21342262f232/Brentwood_Pacific_Palisades_Report_\(2\).pdf](https://planning.lacity.org/odocument/e4a918f7-e513-4e69-9ec4-21342262f232/Brentwood_Pacific_Palisades_Report_(2).pdf), accessed July 20, 2020.

⁵⁴ Geosyntec Consultants, Preliminary Geotechnical Investigation for the Proposed Mirman School Learning Center, January 20, 2021, included as Appendix 7 of this MND.

15 feet bgs, and cylindrical drilling for foundation caissons of up to 20 feet bgs.⁵⁵ Therefore, given the past history of Native American occupation in Los Angeles and the greater southern California Area, it is concluded that Project construction activities could potentially unearth or otherwise disturb buried archaeological resources. Appropriate mitigation measures for Tribal Cultural Resources analyzed as required under AB 52 are included herein (see Checklist Section XVIII, Tribal Cultural Resources, of this MND).

In the event any archaeological materials are unexpectedly encountered during Project construction, work in the area would cease and deposits would first be evaluated for historic significance in accordance with CEQA Guidelines Section 15064.5. As set forth in CEQA Guidelines Section 15064.5, if the City determines that the archaeological resource is an historical resource, it shall refer to the provisions of Section 21084.1 of the PRC. If an archaeological resource does not meet the criteria for historical resources but does meet the definition of a unique archaeological resource, the resource shall be treated in accordance with the provisions of Section 21083.2. Compliance with the regulatory standards in PRC Section 21083.2 and CEQA Guidelines Section 15064.5 would ensure the appropriate treatment of any potential unique archaeological resources unexpectedly encountered during grading activities. Therefore, through compliance with applicable regulations governing the treatment of any uncovered archaeological resources, and mitigations measures elsewhere herein, the Project would not cause a substantial adverse change in the significance of an archaeological resource. Impacts to archaeological resources would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed above, the Project Site is largely underlain by fill material been subject to previous grading and development. No traditional burial sites have been previously recorded on or within 0.5 mile of the Project Site according to the SCCIC and NAHC SLF records searches undertaken for contained within the TCR Report which is included as Appendix 15 of this MND. If human remains were discovered during construction of the Project, work in the immediate vicinity would be halted, the County Coroner, construction manager, and other entities would be notified per California Health and Safety Code Section 7050.5, and disposition of the human remains and any associated grave goods would occur in accordance with Public Resources Code Section 5097.91 and 5097.98. With the implementation of regulatory requirements and mitigation measures recommended under Checklist Section XVIII, Tribal Cultural Resources, of this MND, the Project would not disturb any human remains. Impacts related to human remains would be less than significant, and no mitigation measures are required.

⁵⁵ Specifically, the Project's maximum excavation depths would be 13 feet bgs for the Learning Center and 15 feet bgs for the stormwater capture tank, with cylindrical drilling for caissons of 20 feet in length.

VI. ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The analysis below is based, in part, on the energy analysis worksheets prepared for the Project and included as Appendix 6 of this MND.

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

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

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

In accordance with the considerations above, the following analysis evaluates the potential energy impacts of the Project with a particular emphasis on whether the Project would result in the inefficient,

wasteful, or unnecessary consumption of energy. The supporting energy calculations are included in Appendix 6 of this MND.

Electricity transmission to the Project Site is provided and maintained by the Los Angeles Department of Water and Power (LADWP) through a network of utility poles and underground utility lines, including two existing 4-inch underground power lines within the Mulholland Drive right-of-way with feeders and an on-site transformer serving the Mirman School campus.⁵⁶ In addition, natural gas service in the vicinity of the Project Site is provided by the Southern California Gas Company (SoCalGas), including an existing 8.5-inch gas main within the Mulholland Drive right-of-way and a 2-inch feeder line serving the school campus.⁵⁷

Construction

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

As shown in Table 6, it is estimated that a total of 12,345 kilowatt-hours (kWh) of electricity, 5,496 gallons of gasoline, and 56,350 gallons of diesel fuel would be consumed during Project construction.

Electricity

Electricity would be supplied to the Project Site by LADWP and would be obtained from both existing infrastructure serving the Project Site and gas- and/or diesel-powered portable generators, as required. As shown in Table 6, approximately 12,345 kWh of electricity would be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. In addition, although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (greater than 120 days) providing illumination for the Project Site and staging areas would also comply with applicable Title 24 requirements (includes limits on the wattage allowed per specific area), which would result in the conservation of energy. Lastly, due to the size of the Project, including only 1.45 acres of disturbance area/grading and the construction of a net increase of only 22,508 square feet of floor area, the amount of electricity used during Project construction would be limited. Therefore, the use of electricity during project construction would be minimal and would not be wasteful, inefficient, or unnecessary.

⁵⁶ KPFF Consulting Engineers, Mirman School for Gifted Children, Utility Technical Report: Water, Wastewater, and Energy, July 2021.

⁵⁷ KPFF Consulting Engineers, Mirman School for Gifted Children, Utility Technical Report: Water, Wastewater, and Energy, July 2021.

Table 6
Summary of Energy Use During Construction^a

Fuel Type	Quantity
Electricity	
Water Consumption (Dust Control) ^b	1,610 kWh
Construction Temporary Power (Lighting, power tools)	10,735 kWh
Total Electricity	12,345 kWh
Gasoline	
On-Road Construction Equipment	5,496 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	5,496 gallons
Diesel	
On-Road Construction Equipment	14,207 gallons
Off-Road Construction Equipment	42,143 gallons
Total Diesel	56,350 gallons
<i>kWh = kilowatt-hour</i> <i>Note: Numbers may not add up exactly due to rounding.</i> ^a Detailed calculations are provided in Appendix 6 of this MND. ^b Energy usage associated with supply and conveyance of water from the source. <i>Source: Eystone Environmental, August 2021.</i>	

Natural Gas

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

Transportation Energy

The Project would include 1.45 acres of disturbance area, including a total of approximately 12,600 cy of grading and 2,200 cy of soil export, and the construction of a net increase of 22,508 square feet of floor area. As shown in Table 6, on- and off-road vehicles would consume an estimated 5,496 gallons of gasoline and approximately 56,350 gallons of diesel fuel throughout the Project's construction. Trucks and equipment used during proposed construction activities would comply with CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. In addition to reducing criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy and reduce fuel consumption. On-road vehicles (i.e., haul trucks, worker vehicles) would also be subject to Federal fuel efficiency requirements. Lastly, due to the size of the Project, including a net increase of 22,508 square feet of floor area, the number of construction-related truck and construction worker trips would be limited. Therefore, the use of gasoline and diesel fuel during Project construction would not be wasteful, inefficient, or unnecessary.

Construction Materials

Estimating the energy usage associated with the production/transport of materials used during the construction of the Project or used during the operational life of the Project, or the end of life for the materials and processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. However, it is expected that the materials which would be used during the Project's construction would be manufactured/produced in a facility which is in compliance with the applicable regulatory requirements such as Title 24 or CalGREEN requirements. Therefore, construction materials would be manufactured or produced in an energy efficient manner. Additionally, it is expected that the transport of the materials would be in compliance with the applicable regulatory requirements regarding energy usage such as compliance with Federal Corporate Average Fuel Economy (CAFÉ) requirements. Lastly, due to the size of the Project, including a net increase of 22,508 square feet of floor area, the use of construction materials would be limited. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Conclusion

Based on the above, construction of the Project would not have a substantial impact on local and regional energy supplies, peak demand for electricity, or energy resources. In addition, construction of the Project would comply with existing applicable energy standards and would not be wasteful, inefficient, or unnecessary consumption of energy resources. Thus, Project energy resource impacts during construction would be less than significant, and no mitigation is required.

Operation

During Project operation, energy would be consumed for multiple purposes including, but not limited to, heating/ventilating/air conditioning (HVAC), refrigeration, lighting, electronics, office equipment, and commercial machinery (including kitchen appliances). Energy would also be consumed during Project operation related to water usage, solid waste disposal, and vehicle trips. Annual energy use has been calculated for buildout of the Project (i.e., a net increase of 22,508 square feet of school uses) and is shown in Table 7. As shown in Table 7, a total of 362,476 kWh of electricity, 587,791 cubic feet of natural gas, 102,497 gallons of gasoline, and 20,172 gallons of diesel fuel would be consumed during Project operation (slightly less under the Alternative LLA Scenario owing to the development of a smaller storage/trash/recycling enclosure, seating area and shade structure). Detailed calculations for existing and future Project uses are provided in Appendix 6 of this MND.

Electricity

After the construction of the Project is complete, there would be a net increase in electricity usage on the Project Site compared to existing conditions due to the additional square footage to be constructed. As shown in Table 7, with buildout of the Project, the on-site electricity demand would be approximately 362,476 kWh of electricity per year.⁵⁸ The Project would comply with requirements of the Los Angeles

⁵⁸ Electricity demand estimate includes electricity for the restroom, LED lighting and EV charging. Calculations are provided in Appendix 6 of this MND.

Table 7
Summary of Total Annual Energy Use During Operation^a

Source	Project with Project Features
Electricity	
Building	332,351 kWh
Water	30,125 kWh
Total Electricity	362,476 kWh
Natural Gas	587,791 cf
Mobile	
Gasoline	102,497 gallons
Diesel	20,172 gallons
Total Transportation Fuel	122,669 gallons
<i>cf = cubic feet</i> <i>kWh = Kilowatt-hour</i> ^a Detailed calculations are provided in Appendix 6 of this MND. Energy usage includes the entire Project Site (existing uses to remain + new construction). Source: Eyestone Environmental, August 2021.	

Green Building Code and CalGreen/Title 24 energy efficiency requirements, which were adopted to reduce energy consumption. Such measures include enhanced insulation, energy efficient ventilation systems, double paned windows and use of light emitting diode (LED) lighting where appropriate. All building systems would meet current Title 24 Energy Standards, and the proposed building would include features so as to be capable of meeting LEED Silver or equivalent green building standards under LEED v4. These standards would reduce energy, water usage and waste and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, WaterSense-labeled plumbing fixtures and Energy Star-labeled appliances; reduction of indoor and outdoor water use; weather-based controller and drip irrigation systems; and water-efficient landscape design. Although there would be a net increase of 22,508 square feet in building square footage and energy usage, the electricity usage on the Project Site would be more efficient. Therefore, the use of electricity during Project operations would not increase substantially, and would not be wasteful, inefficient, or unnecessary.

Natural Gas

As shown in Table 7, the Project would consume an estimated 587,791 cubic feet of natural gas annually (1,610 cubic feet per day).⁵⁹ As discussed above, the Project would comply with requirements of the Los Angeles Green Building Code and CalGreen/Title 24 energy efficiency requirements. The Project would also include features so as to be capable of meeting LEED Silver or equivalent green building standards under LEED v4, which entails implementing conservation features to reduce natural gas usage. These measures would require efficient use of natural gas such as high-performance window glazing to reduce

⁵⁹ Natural gas demand estimate based on estimate provided by the California Emissions Estimator Model (CalEEMod).

natural gas used for heating purposes and high-efficiency domestic water heaters. Therefore, the use of natural gas during Project operations would not be wasteful, inefficient, or unnecessary.

Transportation Energy

During operation, the Project would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. As summarized in Table 7, buildout of the Project would consume approximately 102,497 gallons of gasoline and 20,172 gallons of diesel fuel per year, or a total of 122,669 gallons of petroleum-based fuels per year. Furthermore, the existing EV ready and EV equipped parking spaces at the Project Site would be retained under the Project. As such, operational impacts to transportation energy would be less than significant.

Conclusion

Based on the above, operation of the Project would comply with existing applicable energy standards and would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Thus, Project operations would result in less than significant energy resources impacts during operation, and no mitigation measures are required.

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

Less Than Significant Impact. The Project would be designed to comply with all applicable state and local codes related to energy, including the City's Green Building Ordinance and the California Green Building Standards Code. Design features that would be implemented would include the use of efficient lighting technology; energy efficient heating, ventilation and cooling equipment; and Energy Star rated products and appliances. In addition, the Project would be designed to meet LEED Silver or equivalent green building standards under LEED v4. Electricity provided to the Project Site would be sourced from the LADWP which currently generates a portion of power from renewable resources. The Project would also retain the school's existing EV ready and EV equipped parking spaces. Overall, the Project would be designed and constructed in accordance with applicable state and local green building standards that would serve to reduce the energy demand of the Project. In addition, as discussed above, the demand for electricity during construction and operation of the Project would be minimal and would represent a small fraction of LADWP's projected and planned sales. Similarly, petroleum-based fuels during construction and operations would also represent a fraction of the 2025 (when the full increase in student enrollment under the Project is expected) projected fuel use in Los Angeles County. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Impacts would be less than significant, and no mitigation measures are required.

VII. GEOLOGY AND SOILS

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

The following analysis is based, in part, on the Preliminary Geotechnical Investigation for the Proposed Mirman School Learning Center (Geotechnical Investigation) and associated Addendum to the Geotechnical Investigation prepared for the Project by Geosyntec Consultants dated January 20, 2021,

and April 30, 2021, respectively. The Geotechnical Investigation and Addendum are included as Appendices 7.1 and 7.2, respectively, of this MND. All specific information on geologic and soils conditions in the discussion below is from the Geotechnical Investigation and Addendum unless otherwise indicated. The Preliminary Geotechnical Investigation and Addendum were reviewed and approved by the City of Los Angeles Department of Building and Safety (LADBS), and the LADBS Preliminary Geotechnical Investigation Approval Letter, dated June 15, 2021 (Log # 116076-01), is included as Appendix 7.3 of this MND.

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

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

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

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

As indicated in the Geotechnical Investigation, no faults cross or project toward the Project Site. Based on the Geotechnical Investigation and the City's Zone Information and Map Access System (ZIMAS), the Project Site is also not located within an Alquist-Priolo Earthquake Fault Zone or within a City-designated Fault Rupture Study Area.⁶⁰ The closest active faults to the Project Site are the Hollywood Fault located approximately 5.5 miles to the southeast, the Santa Monica Fault located approximately 5.8 miles to the south, the Newport-Inglewood Rose Canyon Fault Zone (NI-RCFZ) located approximately 8 miles to the southwest, and the Sierra Madre Fault Zone located approximately 10 miles to the south. As no known (mapped) active or potentially active faults or Alquist-Priolo Earthquake Fault Zones bisect or are located

⁶⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

within the immediate vicinity of the Project Site, the Geotechnical Investigation concludes that the potential for surface fault rupture at the Project Site is low. The Project would also not involve mining operations, deep excavation into the earth, or boring of large areas, which could create unstable seismic conditions or stresses in the Earth's crust. Therefore, the Project would not result in the rupture of a known earthquake fault. The impact would be less than significant, and no mitigation measures are required.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within the seismically active Southern California region which is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. However, as discussed under Checklist Question VII.a.i above, no known active or potentially active faults bisect or are located within close proximity to the Project Site. Furthermore, Project construction activities would not include blasting or mining operations. Hence, the Project would not have the potential to result in strong seismic ground shaking.

As noted above, no known active or potentially active faults bisect or are located within close proximity to the Project Site. Still, the Project Site could potentially be subject to moderate to severe ground shaking in response to a large magnitude earthquake occurring on a local or more distance active fault during the expected lifespan of the Project. The closest active faults are the Hollywood Fault located approximately 5.5 miles to the southeast, the Santa Monica Fault located approximately 5.8 miles to the south, the Newport–Inglewood Rose Canyon Fault Zone (NI-RCFZ) located approximately 8 miles to the southwest, and the Sierra Madre Fault Zone located approximately 10 miles to the south. According to the Geotechnical Investigation, these faults have the ability to generate maximum moment magnitudes of 6.7, 7.4, 7.5 and 6.7, respectively. However, as with other development projects in the City, the Project would comply with the Los Angeles Building Code, which incorporates current seismic design provisions of the California Building Code (CBC) with City amendments. The 2019 CBC incorporates the latest seismic design standards for structural loads and materials, as well as provisions from the National Earthquake Hazards Reduction Program to lessen the effect of losses from an earthquake and maximize earthquake safety. Specifically, given the maximum moment magnitude potential at the Project Site, along with the existing on-site soils, the Geotechnical Investigation concludes that the Project Site is located within CBC Site Class C and subject to the CBC's seismic design standards for this class. As shown by the LADBS Preliminary Geotechnical Investigation Approval Letter included as Appendix 7.3, LADBS concurs with this seismic design standard and shall require compliance with these parameters during the City's plan check process. Accordingly, with compliance with applicable regulations, impacts regarding strong seismic ground shaking would be less than significant, and no mitigation measures are required.

iii. Seismic-related ground failure, including liquefaction?

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

As provided in the Geotechnical Investigation, neither the City of Los Angeles nor the State of California classify the Project Site as part of a potentially liquefiable area.^{61,62} In addition, groundwater in the vicinity of the Project Site is inferred to be approximately 100 to 300 feet bgs based on Geotracker and topo maps⁶³; no groundwater was encountered in the five exploratory borings conducted at the Project Site by Geosyntec which extended from 21.5 to 32 feet bgs (see Figure 2 of the Geotechnical Investigation for boring locations), and the Geotechnical Investigation indicates that groundwater is not expected within the soil zone. Also, while there is fill averaging between 7 and 34 feet bgs at the Project Site (approximately 0 to 35 feet bgs under the proposed Learning Center building), the fill underlying the proposed improvements is medium dense to dense with very dense formation material. As such, the Geotechnical Investigation concludes that the potential for liquefaction at the Project Site is low, and LADBS has concurred. Also, the Geotechnical Investigation indicates that seismically induced settlement may occur within looser zones of undocumented fill at the Project Site, but that because the Learning Center, the only substantial structure proposed, would be founded on deep foundations embedded into competent materials below the undocumented fill, seismic compression of undocumented fill is not in the design of the Learning Center. Furthermore, development of the proposed improvements would occur in compliance with regulatory requirements, including the California Building Code and the LAMC, which would address soil stability. Therefore, with compliance with applicable regulatory requirements and the recommendations of the LADBS-approved Geotechnical Investigation (required by Mitigation Measures GEO-1 through GEO-5 as described later in this section), the Project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure, including liquefaction. The impact would be less than significant, and no mitigation measures are required.

iv. Landslides?

Less Than Significant Impact. Landslides generally occur in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The Project Site is located in the Santa Monica Mountains within a City-designated Hillside Area.⁶⁴ The eastern and southern portions of the Project Site contain hillsides that include approximately 100-foot-high slopes descending at an approximately 1.5:1 slope to the relatively flat terrace portion of the Project Site where the Mirman School campus is located. A portion of these aforementioned slopes are located within a City-designated “Landslide Area” and a City-designated “Earthquake-Induced Landslide Area,” as well as a State-designated “Zone of Required Investigation” for landslides.^{65,66,67} However: (1) these slopes are located approximately 300 feet east from the Project’s proposed improvements; (2) retaining walls exist at the foot of slope of much of the slopes surrounding

⁶¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁶² State of California, California Geological Survey, Seismic Hazard Zones. Van Nuys Quadrangle, February 1, 1998.

⁶³ Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report for Mirman School, August 28, 2020.

⁶⁴ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁶⁵ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, adopted April, 1996.

⁶⁶ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁶⁷ State of California, California Geological Survey, Seismic Hazard Zones. Van Nuys Quadrangle, February 1, 1998.

the terrace; (3) previous stability analysis of the slope reported safety factors in excess of 1.5 for static and 1.0 for pseudo static conditions, indicating the risk of seismically induced landslides to be low; (4) elements indicating potential slope instability were not observed surrounding the Project Site during a field survey conducted as part of the Geotechnical Investigation; and (5) the existing school facilities have been located at their current location for decades without any landslide-related damage. Furthermore, as set forth in the Addendum to the Geotechnical Investigation prepared for the Project included as Appendix 7.2 of this MND, and as requested by LADBS, extensive slope stability analyses have been prepared for the Project, in compliance with all City and State-required criteria for assessing the potential for landsliding. As shown by the LADBS Preliminary Geotechnical Investigation Approval Letter included as Appendix 7.3, LADBS concurs with the provided slope stability analyses and has determined that the construction of the Project would not be subject to hazards pertaining to seismically induced landslides. For all these reasons, the potential for landslides affecting the Project is negligible.

As indicated in the ZIMAS Parcel Profile Reports for the Project Site, the Project Site is located within a City of Los Angeles Bureau of Engineering (BOE) Special Grading Area.⁶⁸ BOE Special Grading Areas denote certain City-designated hillside areas where the City requires combined soils and geology reports for significant grading activities (as determined by the BOE). In addition, export of more than 1,000 cubic yards of earth materials from a property located within a Special Grading Area requires approval of a haul route by the City's Board of Building and Safety Commissioners. While the Project Site is located within a designated hillside area, the Project grading would occur largely on a flat terrace portion of the Project Site within the existing development footprint of the school. A combined geology and soils report (i.e., the Preliminary Geotechnical Report and subsequent addendum) has been prepared for the Project, as required by the City for projects within BOE Special Grading Areas, and has been reviewed and approved by LADBS, indicating its concurrence that the Project complies with applicable geotechnical standards and criteria. The Geotechnical Investigation and LADBS Approval Letter are included as Appendices 7.1 and 7.3, respectively, of this MND. In addition, as the Project will involve the export of up to 2,200 cubic yards of earth materials, approval of a haul route by the Board of Building and Safety Commissioners will be required.

In addition: (1) upon buildout of the Project, the existing topography of the Project Site would not be substantially altered as the proposed uses would be located largely within the existing relatively flat and previously graded development footprint of the school (for example, the new Learning Center building is proposed in an existing school playfield); and (2) the Project would adhere to local and state building codes including the LAMC, the Los Angeles Building Code, and the California Building Code, as well as the recommendations provided in a site-specific geotechnical report as required by the LAMC to minimize seismic-related hazards. Hence, the Project would not increase the potential for landslides.

Based on the above, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. Impacts would be less than significant, and no mitigation measures are required.

⁶⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

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

Less Than Significant Impact. The 5.46-acre Project Site (6.02 acres with the proposed LLA) includes a relatively flat terrace in the northern and central portions of the Project Site, and hillsides in the southern and eastern portions. The relatively flat terrace portion is currently developed with eight academic-related buildings, surface parking lots, play fields/courts, pedestrian areas and landscaping, while an existing emergency access road runs from the flat terrace portion up the hillside area in the southern portion of the property to the Berkeley School. During Project construction, grading, excavation and other construction activities would disturb approximately 1.45 acres of on-site soils (see Figure 15) and have the potential to expose these soils to stormwater runoff flows and wind during the construction period thereby potentially resulting in soil erosion and/or the loss of topsoil. However, the proposed improvements would be developed largely within the existing relatively flat development footprint of the campus rather than on the hillside area and would be very limited in scope (only approximately 0.3 acre of new impervious surface and 1.45 acres of total soil disturbance), thereby reducing the potential for soil erosion and/or the loss of topsoil during Project construction. Furthermore, Project construction would occur in compliance with local construction requirements that would implement the requirements of the National Pollutant Discharge Elimination System (NPDES) permit which requires the implementation of a Stormwater Pollution Prevention Plan (SWPPP) during construction. The SWPPP would identify best management practices (BMPs) to minimize erosion, including scheduling excavation and grading activities during dry weather periods where possible, installing erosion control and drainage devices, and securing stockpiles and excavated soils with tarps or plastic sheeting. In addition, all grading activities would require grading permits from LADBS which would include the required implementation of an Erosion Control Plan to minimize erosion and sedimentation from the construction site during grading and excavations. Grading and site preparation would also comply with all applicable provisions of Chapter IX, Article 1 of the LAMC, which addresses grading, excavations, and fills.

During Project operation, the existing drainage pattern would be retained, and while the Project would result in a small (0.3-acre) increase in impervious surfaces at the Project Site, the majority of the Project Site would continue to remain as pervious surfaces, thereby minimizing the increase in stormwater runoff and thus the associated potential for water-borne erosion. Lastly, in accordance with the requirements of the NPDES permit and Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, measures would be implemented throughout the operational life of the Project to reduce erosion.

Based on the above, as well as the LADBS-approved Preliminary Geotechnical Investigation, the Project would not result in substantial erosion or the loss of topsoil. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact With Mitigation Incorporated. As discussed above, a Prominent Ridge abuts the Project Site to the east and south which includes approximately 100-foot-high slopes descending to the terrace upon which the school improvements are located at an approximately 1.5:1 slope. Still, for the reasons discussed under Checklist Question VII.a.iv above, the Project would not result in or be subject to landslides.

Lateral spreading is a term referring to landslides that commonly form on gentle slopes and that have rapid fluid-like flow movement.⁶⁹ The proposed improvements would be located largely within the relatively flat terrace area of the Project Site, within the existing graded development footprint of the school, rather than within the hillside portions of the Project Site that are designated by the City as a “Landslide Area,” “Earthquake-Induced Landslide Area,” and “Zone of Required Investigation” for landslides.^{70,71,72} In fact, the proposed improvements would be located over 300 feet west of these areas which occur in the easterly-most portion of the Project Site and beyond, and would be separated from these areas by existing retaining walls. Furthermore, as discussed previously, the stability analysis indicates generally safe slopes (which LADBS has concurred with, as evidenced by its approval of the Preliminary Geotechnical Investigation), and as discussed under Checklist Question VII.a.iii above, neither the City nor the State of California classify the Project Site as part of a potentially liquefiable area.^{73,74} Furthermore, the Project would adhere to local and state building codes, including the LAMC and the California Building Code, as well as the site-specific design-level recommendations set forth in the Project’s LADBS-approved geotechnical report.

Subsidence generally occurs when a large portion of land is displaced vertically, usually due to the rapid and intensive withdrawal of subterranean fluids such as groundwater or oil. The Project Site is not located within the limits of an oil field or a zone of known subsidence due to oil or other fluid withdrawal, and no large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or is planned at the Project Site or the general vicinity.^{75,76} Hence, the LADBS-approved Geotechnical Investigation concludes that subsidence due to extraction or excavation is not considered an impact on the Project Site and would not have an impact on the proposed improvements.

The Geotechnical Investigation indicates that seismically induced settlement may occur within looser zones of undocumented fill at the Project Site, but that because the Learning Center, the only substantial structure proposed, would be founded on deep foundations embedded into competent materials below the undocumented fill, seismic compression of undocumented fill is not in the design of the Learning Center. Also, total settlement (excluding seismically induced settlement) based on the remedial grading recommendations in the Geotechnical Investigation would be expected to be less than 1 inch for shallow foundations spanning less than 25 feet, while differential settlement between adjacent footings would be half the estimated total settlement over 30 feet. The Geotechnical Investigation concludes that these

⁶⁹ U.S. Geological Survey, Earthquake Glossary, <http://earthquake.usgs.gov/learn/glossary/>, accessed January 2, 2019.

⁷⁰ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, adopted April, 1996.

⁷¹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁷² State of California, California Geological Survey, Seismic Hazard Zones. Van Nuys Quadrangle, February 1, 1998.

⁷³ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

⁷⁴ State of California, California Geological Survey, Seismic Hazard Zones. Van Nuys Quadrangle, February 1, 1998.

⁷⁵ Geosyntec Consultants, Preliminary Geotechnical Investigation for the Proposed Mirman School Learning Center, January 20, 2021. Included as Appendix 7 of this MND.

⁷⁶ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

anticipated settlement values would be acceptable provided that construction is in accordance with the recommendations in the Geotechnical Investigation and in compliance with local building codes and regulations. As noted above, LADBS has concurred with these conclusions.

As discussed under Checklist Question VII.a.iii above, the Project Site is underlain by fill material. However, for the reasons discussed under Checklist Question VII.a.iii, the Project would not result in or be subject to liquefaction.

Collapsible soils consist of loose, dry, low-density materials that collapse and compact under the addition of water or excessive loading. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events.⁷⁷ According to the Geotechnical Investigation, based on the results of consolidation testing, the soils underlying the Project Site are not considered prone to hydroconsolidation (also known as soil collapse).

While the Project would not be subject to landslides, lateral spreading, subsidence, liquefaction or collapsible soils, previously placed fill soils considered to be undocumented were observed to approximately 15 feet bgs during geotechnical explorations, and nearby relevant boring previously performed by Byer in 2014 indicated undocumented fill to depths from 7 to 34 feet bgs at the Project Site.⁷⁸ Fill depths beneath the proposed Learning Center building are anticipated to vary from 0 and 35 feet bgs, with the deepest fill expected below the southwest corner of the proposed building. Specifically, the fills in the northern portion of the Project Site are considered to have been placed and compacted under observation and testing by a qualified geotechnical engineer, while the fill in the proposed improvement would be considered undocumented and not suitable for foundation purposes. Therefore, the following mitigation measures are proposed:

Mitigation Measure GEO-1: Project development shall adhere to the geotechnical, grading and compaction recommendation and design values in the January 20, 2021, Geosyntec Preliminary Geotechnical Investigation; April 30, 2021, Addendum; and conditions of approval set forth in the associated June 15, 2021, LADBS approval letter. The recommendations in the Preliminary Geotechnical Investigation and Addendum include, but are not limited to: performing remedial grading and compaction to the compaction, moisture and loading requirements set forth in the Preliminary Geotechnical Investigation and Addendum; use of deep foundations (e.g., cast in drilled hole [CIDH] piers, auger-cast piles, or driven piles); founding all footings in competent dense formational material; where feasible, extending overexcavations at least 2 feet laterally beyond the limits of the proposed improvements; and preparing a Controlled Low Strength Materials (CLSM) placement report for LADBS approval at the completion of CLSM placement.

⁷⁷ Association of Environmental & Engineering Geologists. Expansive and Collapsible Soil, [www.aegweb.org/?page=Expansive Soil](http://www.aegweb.org/?page=Expansive+Soil), accessed January 2, 2019.

⁷⁸ Based on a review of historical aerial imagery and topographic maps, a southwest-northeast trending canyon/drainage previously existed beneath the terrace portion of the Project Site. Historical topographic maps indicate up to 60 feet of elevation difference along the axis of the previous drainage to existing elevations. Mass grading of the area filled the canyon/drainage prior to 1972, where aerial imagery shows the first structures at the school site. This grading may have been performed in conjunction with operations at the previous landfill located west of the site. Several of the exploratory borings conducted for the Geotechnical Investigation encountered bedrock (e.g., shale, mudstone and sandstone of the Modelo Formation) at approximately 32 feet bgs.

Mitigation Measure GEO-2: Temporary construction slopes shall have a maximum slope ratio (horizontal; vertical) of 1:1 within Soil Type B (Modesto Formation) and 1.5:1 within Soil Type C (previously placed fill). Temporary construction slopes shall be a maximum of 10 feet in height, with appropriate surcharge setbacks provided from the top of un-shored temporary construction slopes for vehicular traffic, equipment and/or materials.

Mitigation Measure GEO-3: Various retaining walls and building envelope walls are proposed associated with the proposed Learning Center building. These walls shall be underlain by properly compacted rather than undocumented fill.

Mitigation Measure GEO-4: Proposed development where only shallow excavations/foundations are required shall adhere to the geotechnical, grading and compaction recommendations for such development in the Preliminary Geotechnical Investigation and associated Addendum. Shallow foundations are considered suitable for use at the site where existing previously placed fill thicknesses are anticipated to be less than five feet beneath the proposed structural improvements and can be excavated to competent formational soils and recompacted as engineered fill. These recommendations include, but are not limited to: a minimum recommended shallow foundation embedment depth of at least 15 inches below the lowest adjacent subgrade for spread or continuous foundations embedded in formational material; and avoiding the spanning of structure and equipment foundations across different soil strata. With the implementation of Mitigation Measures GEO-1 through GEO-5 above, and with compliance with applicable City grading, foundation design and building requirements, the Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant with mitigation incorporated.

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

Less Than Significant Impact With Mitigation Incorporated. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Laboratory Expansion Index testing and observations conducted during drilling of the exploratory borings for the Geotechnical Investigation indicates that near surface site soils possess a very low to low expansion potential. Atterberg Limits testing and visual observation of Modelo Formation materials indicate silts and clays of low plasticity. Highly expansive clays were not observed during the explorations or by others, therefore, they are not anticipated to impact the proposed improvements. Still, the Geotechnical Investigation states, "If expansive clays are encountered during grading or construction, Geosyntec should provide additional grading and/or foundation recommendations as appropriate" and "If encountered, localized areas of loose and potentially compressible material or highly expansive clays could require overexcavation to deeper elevations, based on conditions observed during grading." Therefore, pursuant to the recommendations contained in the LADBS-approved Geotechnical Investigation, the following mitigation measure is proposed:

Mitigation Measure GEO-5: Soils shall be monitored and tested for their expansion potential during grading. Any areas shown to contain expansive soils shall be overexcavated to deeper elevations and compacted to the standards referenced in the Preliminary Geotechnical Investigation and associated Addendum, including

but not limited to those in Mitigation Measure GEO-1 if below the proposed Learning Center, Library expansion, or storage/trash/recycling enclosure, or those in Mitigation Measure GEO-4 if in areas of proposed improvements requiring only shallow excavations/foundations.

With implementation of Mitigation Measure GEO-5, the Project would not be located on expansive soils, creating substantial direct or indirect risks to life or property, and the impact would be less than significant with mitigation incorporated.

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

No Impact. According to the Geotechnical Investigation, the Project Site is currently served by the City's public sewer system and would continue to be served by this system under the Project. No septic tanks or alternative disposal systems are necessary or proposed. Therefore, the Project would have no impact related to the ability of soils to support septic tanks or alternative wastewater disposal systems, and no mitigation measures are required.

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

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms since the majority of species that have existed on earth from this area are extinct. Section 5097.5 of the Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources.

A paleontological records search was conducted for the Project by the Los Angeles County Natural History Museum (NHM) on November 7, 2019, and is included as Appendix 8 to this MND. The records search indicates that no vertebrate fossil localities have been previously recorded on the Project Site. However, the records search also indicates that seven vertebrate fossil localities have been recorded nearby from the same sedimentary Miocene Monterey Formation deposits that underlie the Project Site, including LACM (CIT) 321 located approximately 800 feet west of the Project Site near Corda Drive and LACM (CIT) 317 located approximately 900 northeast of the Project Site near Sepulveda Boulevard. These localities produced an extensive composite of marine fish species. While the Project improvements would be developed within the existing graded development footprint of Mirman School which is largely underlain by fill material ranging between 7 and 34 feet bgs, and while Project excavations would be limited to a maximum depth of approximately 15 feet (with drilling for cylindrical caissons down to approximately 20 feet), the records search indicates that excavations into the Monterey Formation (e.g., the layer under the fill material) could encounter significant vertebrate fossils. Therefore, the following mitigation measure is proposed:

Mitigation Measure GEO-6: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction

activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

With implementation of Mitigation Measure GEO-6, the Project would not have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, and the impact would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

The analysis below is based, in part, on the air quality and greenhouse gas (GHG) emissions worksheets and modeling output for the Project included as Appendix 2 of this MND.

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

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

Less Than Significant Impact. The Project would generate an incremental contribution to and cumulative increase in GHG emissions. Section 15064.4 of the CEQA guidelines recommends quantification of a Project's GHG emissions, but does not establish a threshold of significance. Moreover, neither the State, SCAQMD, or the City of Los Angeles City has adopted any numeric threshold for GHG emissions. Therefore, the quantification is being done for informational purposes only and Project GHG emissions are not evaluated against any numeric threshold, but instead are evaluated consistent with CEQA Guidelines Section 15064.4(b) by considering whether the Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction

GHG emissions from construction activities were forecasted using a reasonable estimate of construction schedule and phasing and applying published GHG emission factors. Construction emissions were calculated using the CalEEMod model. The output values used in this analysis were adjusted to be Project-specific, based on usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix 2 of this MND).

The Project would include approximately 1.45 acres of ground disturbance, approximately 12,600 cy of total grading, approximately 2,200 cy of soil export, and the construction of a net increase of 22,508 square feet of school uses. As presented in Table 8, construction of the Project is estimated to generate a total of 1,060 metric tons of GHGs measured as an equivalent mass of carbon dioxide (MTCO₂e). As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emission estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix 2 of this MND.

Operation

The Project would include a net increase of 22,508 square feet of school uses (slightly less under the Alternative LLA Scenario) and result in 100 additional K-8 students and an estimated 30 additional employees at Mirman School. This would result in direct and indirect GHG emissions generated by the increase in vehicular trips, as well as operations associated with the proposed uses, including: (1) building operations: emissions associated with space heating and cooling, water heating, and lighting; (2) water: emissions associated with energy used to pump, convey, treat, deliver, and re-treat water; and (3) solid waste: emissions associated with waste streams (embodied energy of materials). The Project would comply with the requirements under Title 24 and the Los Angeles Green Building Code, which would serve to reduce GHG emissions.

Operational emissions from the sources described above were estimated using CalEEMod for the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the Project's daily VMT as discussed in Checklist Section XVII, Transportation, and in the Transportation Assessment included as Appendix 14.1 of this MND. The Project's daily VMT was calculated using the LADOT VMT Calculator (Appendix B of the Transportation Assessment). As shown in Table 9, the Project with implementation of Title 24 and Los Angeles Green Building Code requirements including use of LED lighting would result in approximately 1,354 MTCO₂e annually.

Table 8
Construction-Related GHG Emissions
(MTCO₂e)

Year	MTCO ₂ e ^a
2022	473
2023	588
Total	1,061
Amortized Over 30 Years^b	35
<i>MTCO₂e = metric tons of an equivalent mass of carbon dioxide</i> ^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix 2 of this MND. ^b As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory. Source: Eystone Environmental, August 2021.	

Consistency with Applicable Plans and Policies

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 commits the State to the following:

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

AB 32 requires that CARB determine what the statewide GHG emissions level was in 1990 and approve a statewide GHG emissions limit that is equivalent to that level, to be achieved by 2020. Executive Order (EO) B-30-15, which was issued in April 2015 by Governor Brown, requires statewide GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide Greenhouse Gas (GHG) emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

Table 9
Operational Greenhouse Gas Emissions

Emission Source	Project Without Project Design Features CO₂e (metric tons)^a	Project With Project Design Features CO₂e (metric tons)^a
Area ^b	<1	<1
Energy ^c	138	126
Mobile	1,170	1,170
Stationary ^d	1	1
Solid Waste ^e	9	9
Water/Wastewater ^f	11	11
Construction	35	35
Total Emissions	1,365	1,354
^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix 2 of this MND. ^b Area source emissions are from landscaping equipment. ^c Energy source emissions are based on CalEEMod default electricity and natural gas usage rates. ^d Stationary source emissions are from an on-site emergency generator. ^e Solid waste emissions are calculated based on CalEEMod default solid waste generation rates. ^f Water/wastewater emissions are calculated based on CalEEMod default water consumption rates. Source: Eyestone Environmental, August 2021.		

CARB approved a Climate Change Scoping Plan (2008 Scoping Plan) required by AB 32 in 2008.⁷⁹ The 2008 Scoping Plan proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”⁸⁰ The First Update to the AB 32 Scoping Plan (First Update), released on May 22, 2014, found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.⁸¹

In December 2017, CARB adopted the *2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target* (2017 Update). The 2017 Update builds upon the successful framework established by the 2008 Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the state's largest stationary sources and mobile sources. These policies

⁷⁹ Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.

⁸⁰ Climate Change Scoping Plan, CARB, December 2008, www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, last reviewed April 3, 2013.

⁸¹ CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, May 2014, p. 34.

include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program, which constraints and reduces emissions at covered sources.⁸²

The California Attorney General's Office has taken an active role in addressing climate change in CEQA documents. The Attorney General's Office has created and routinely updates a Fact Sheet listing project design features to reduce greenhouse gas emissions.⁸³ The Attorney General's Office created the Fact Sheet primarily for the benefit of local agencies processing CEQA documents, noting that "local agencies will help to move the State away from 'business-as-usual' and toward a low-carbon future." The Fact Sheet explains that the listed "measures can be included as design features of a project," but emphasizes that they "should not be considered in isolation, but as part of a larger set of measures that, working together, will reduce greenhouse gas emissions and the effects of global warming."

The Governor's Office of Planning and Research (OPR) recommended Amendments to the CEQA Guidelines for GHGs which were adopted on December 30, 2009. CEQA Guidelines Section 15064.4 was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with the developing practice, this section of the CEQA Guidelines urges lead agencies to quantify GHG emissions of projects where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. In addition to quantification, CEQA Guidelines Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., the extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to reduce or mitigate GHGs).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance; instead, lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officer's Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence.⁸⁴ The CEQA Guidelines Amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analyses.⁸⁵

GHG emissions to be reduced 40 percent below 1990 levels by 2030. SB 32, signed into law in September 2016, codifies the 2030 GHG reduction target in EO B-30-15. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

Lead agencies must either establish significance thresholds for their respective jurisdictions or determine significance on a case-by-case basis. The lead agency should use its "careful judgment" in making a determination of significance, and should make a "good-faith" effort to "describe, calculate or estimate" the

⁸² CARB, 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target, November 2017, p. 6.

⁸³ California Attorney General's Office Fact Sheet, The CEQA—Addressing Global Warming Impacts at the Local Agency Level, revised January 6, 2010.

⁸⁴ CEQA Guidelines Section 15064.7(c).

⁸⁵ CEQA Guidelines Section 15130 (f).

amount of GHGs that will result from a project.^{86,87} The lead agency is given the discretion to select a reasonable model and methodology to quantify GHGs and to rely on a qualitative analysis or performance based standards for its determination.⁸⁸ A lead agency should also consider the following factors, among others, when assessing the significance of impacts from GHGs: (1) the extent to which the project may increase or reduce GHGs; (2) whether the GHG emissions exceed a threshold of significance that the lead agency determines applies to the project; and (3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, local plan for the reduction or mitigation of GHG emissions.⁸⁹

CEQA Guidelines Section 15064 provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

As discussed above, no applicable numeric significance threshold for GHG emissions has been adopted by the State, SCAQMD, or the City of Los Angeles. Although state, regional, and local plans and policies have been adopted to help address climate change (see discussions above), no current law or regulation would regulate all aspects of the Project's GHG emissions. In the absence of any adopted numeric threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, this analysis considers consistency with regulations or requirements set forth by the 2008 Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, City of Los Angeles Green LA Action Plan (LA Green Plan)/ClimateLA, and City of Los Angeles Sustainable City pLAN/L.A.'s Green New Deal.

A significant impact would occur if the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment by conflicting with applicable regulatory plans and policies to reduce GHG emissions as discussed within CARB's Scoping Plan and subsequent updates, SCAG's 2020–2045 RTP/SCS, and the City's LA Green Plan/Climate LA and the Sustainable City pLAN. The analysis below describes the extent to which the Project complies with or exceeds the performance-based standards included in the regulations outlined in these plans. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CARB's Climate Change Scoping Plan

The Scoping Plan includes a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a Cap-and-Trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

⁸⁶ CEQA Guidelines Section 15064.4(a).

⁸⁷ CEQA Guidelines Section 15064.4(a).

⁸⁸ CEQA Guidelines Section 15064.4(a)(1)-(2).

⁸⁹ CEQA Guidelines Section 15064.4(b).

Mandatory Regulatory Compliance Measures

The following applicable mandatory reduction actions/strategies would serve to indirectly reduce Project GHG emissions.

- **RPS Program and SB 2X:** The California RPS program (Updated under Senate Bill (SB) 2X) requires both public and investor-owned utilities in California to receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50 percent renewables by 2030. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016. Electricity GHG emissions provided above in Table 9 assume that LADWP will receive at least 33 percent of its electricity from renewable sources by the year 2020 and 50 percent by the year 2030 (with a straight line interpolation for the Project buildout year of 2022) consistent with SB 350. The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO₂e per MWh) is based on a year 2007 renewables portfolio of 8 percent and was therefore updated within CalEEMod to reflect the year 2022 renewables portfolio. It is noted that under recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026 and, 60 percent by 2030, and 100 percent by 2045. The Project complies with these percentage renewable requirements inasmuch as the Project is served by LADWP, which is committed to achieving the increase in renewable energy resources by the required dates. Given LADWP's progress towards meeting and exceeding the established targets, as well as potential penalties for non-compliance, it is assumed LADWP will comply.
- **SB 350:** As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this action/strategy because it includes energy-efficient light-emitting diode (LED) lighting for the Project.
- **Cap-and-Trade Program:** As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, this regulatory program applies to electric service providers and not directly to the Project. That being said, while not quantified in this analysis, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table 9 would indirectly be covered by the Cap-and-Trade Program.
- **Advanced Clean Cars Program:** CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025 and increasing the number of zero emission vehicles manufactured in the 2018 through 2025 model years. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by employees and deliveries to the Project. Mobile source GHG emissions provided in Table 9 conservatively do not include this additional 34 percent reduction in mobile source emissions as the CalEEMod model default fleet mix for the Air Basin does not yet account for this regulation. The Project would further support this regulation since Mirman School currently has three parking spaces with EV charging equipment and 13 spaces capable of supporting future EVSE (7 percent and 28 percent, respectively, of the school's 46 existing parking spaces). Furthermore, while the Project would generate the need for additional parking spaces, the number of existing school parking spaces is above LAMC requirements and would exceed this incremental increase in demand associated with the Project such that no additional new parking spaces (including EV or EVSE spaces) would be required.

- **Low Carbon Fuel Standard (LCFS):** The current LCFS requires a reduction of at least 7.5 percent in the carbon intensity (CI) of California's transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030. As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project's emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project's mobile source emissions.
- **California Integrated Waste Management Act of 1989:** The regulation requires each jurisdiction's source reduction and recycling element to include a diversion of 50 percent of all solid waste by 2000. AB 341 (2011) amended the regulation to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter. The Project would comply with these percentage recycling requirements inasmuch as the Project is served by the City of Los Angeles, which currently achieves a diversion rate of 76 percent.⁹⁰ Project-related GHG emissions from solid waste generation provided in Table 9 includes a 76-percent reduction in solid waste generation source emissions consistent with the minimum diversion rate required for the City of Los Angeles (CalEEMod default diversion rate is zero percent). The Applicant must also only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. Consistent with CalGreen requirements, the Project would recycle and/or salvage at least 65 percent of non-hazardous construction and demolition debris, and the Applicant would prepare a construction waste management plan that, at a minimum, identifies the materials to be diverted from disposal and whether the materials would be sorted on-site or comingled.

Applicable Scoping Plan Measures

Further evaluation of project design features and specific applicable policies and measures in the Scoping Plan is provided below. As shown below, the Project would not conflict with the policies included in the Scoping Plan.

- **Energy Independence and Security Act of 2007 (EISA):** EISA requires phasing out of incandescent light bulbs sold in the United States resulting in 25 percent greater light bulb efficiency in 2014 and 200 percent greater efficiency in 2020. CalEEMod does not incorporate this nationwide reduction in electricity usage associated with lighting. The Project would not conflict with this requirement as the Project would incorporate energy-efficient light-emitting diode (LED) lighting throughout the Project. Electricity GHG emissions provided in Table 9 account for LED lighting electricity consumption.
- **CCR, Title 24, Building Standards Code:** The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The Project would not conflict with the regulatory requirements as the Project must comply with applicable provisions of the 2020 Los Angeles Green Code that in turn requires compliance with mandatory standards

⁹⁰ City of Los Angeles Zero Waste Progress Report, March 2013.

included in the California Green Building Standards. The Project would further support this regulation since the Project would incorporate energy-efficient LED lighting throughout the Project, reducing overall energy usage compared to baseline conditions. In addition, lighting and energy usage for new structures would comply with Title 24 standards.

- **Assembly Bill 1109 (AB 1109):** The Lighting Efficiency and Toxic Reduction Act establishes standards structured to reduce average statewide electrical energy consumption by not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.⁹¹ The Project would not conflict with the requirements under AB 1109 because it complies with local and state green building programs and incorporates energy-efficient LED lighting throughout the Project.
- **Senate Bill (SB) 375:** SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. As discussed under Checklist Question XVII.b later in this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project's increased enrollment would result in a de minimis increase in daily trips (i.e., 234 daily trips) that would be below the City's adopted screening threshold of 250 daily trips or more for preparing an analysis of potential VMT impacts. Therefore, it can be concluded that the Project's increase in VMT and associated GHG emissions would similarly be de minimis and less than significant. Therefore, the Project would be consistent with SB 375, the reduction in passenger vehicle GHG emissions per capita goals provided in the 2016 RTP/SCS, and with CARB's updated 2035 target.
- **Senate Bill X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment. The Project would comply with the City of Los Angeles Green Building Code which requires a 20 percent reduction in water usage.
- **CARB In-Use On-Road Regulation:** CARB's in-use on-road heavy-duty vehicle regulation (Truck and Bus Regulation) applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds. Private school buses currently servicing the school would be required to comply with the Truck and Bus regulation.

SCAG 2020–2045 RTP/SCS

SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities

⁹¹ AB 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534

would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those who choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing, and using an electric vehicle will be easier thanks to an expanded regional charging network.

The goals and policies of the 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service. Priority Growth Areas (e.g., High Quality Transit Areas⁹² [HQTAs]) will account for less than 4 percent of regional total land but are projected to accommodate 64 percent of future household growth and 74 percent of employment growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.⁹³ Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential or employee) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals (i.e., SB 375 goal). The reductions generated by fuel economy improvements are already included as part of the State's GHG emissions reduction program and are not double-counted in the SB 375 target calculation.⁹⁴

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use.

⁹² Defined by the 2020–2045 RTP/SCS as corridor-focused Priority Growth Areas within one half mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours.

⁹³ SCAG, Final 2020–2045 RTP/SCS, Making Connections, p. 5, May 7, 2020.

⁹⁴ CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets. Appendix A.

With regard to individual developments, such as the Project, the strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel vehicles; and (3) improved energy efficiency. The Project's consistency with these general categories of strategies and policies are each discussed below.

Consistency with Integrated Growth Forecast

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.⁹⁵ By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. The overall land use pattern in the 2020–2045 RTP/SCS reinforces the trend of focusing new housing and employment near mass transit. Locating jobs near mass transit is one of land use planning best practices in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

Consistent with the SCAG's RTP/SCS alignment of transportation, land use, and housing strategies, While not directly served by a transit stop along Mulholland Drive, the Project Site area is currently serviced by 11 local bus routes, including Metro, LADOT Commuter Express and Santa Clarita Transit lines, which can provide employees with an alternative to single-occupant vehicle travel that would facilitate a reduction in VMT and corresponding vehicular GHG emissions. Thus, the Project's location provides some opportunities for the use of public transit to reduce vehicle trips. Moreover, the Project would represent a development within an existing semi-urbanized area that would expand existing educational uses near other residential uses. As discussed above, the Project would result in a de minimis increase in daily trips that is well below the City's adopted screening threshold of 250 daily trips or more for requiring a VMT analysis. Therefore, the Project's estimated VMT reductions would be consistent with regional strategies to reduce transportation-related GHG emissions and would be consistent with and support the goals and benefits of the 2020–2045 RTP/SCS, which seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them."

Consistency with VMT Reduction Strategies and Policies

As discussed in Checklist Section XI, Land Use and Planning, of this MND, the Project includes GHG-reducing strategies from the 2020–2045 RTP/SCS that are applicable to the Project. Specifically, and as shown in Table 12 in the analysis further below, the Project includes characteristics that are consistent with strategies identified in the 2020–2045 RTP/SCS, and that would reduce Project trips and VMT as compared to the Project without implementation of VMT reducing measures within the Air Basin as measured by CalEEMod. Such characteristics and VMT reducing measures include developing expanded school uses in close proximity to residential uses, because in comparison, a similar project located further away from major residential centers or mass transit would not achieve a similar reduction in VMT. In addition, the Project would retain the existing EV parking at the Project Site, and the school would continue to encourage staff and student carpooling, thereby reducing single-occupant vehicle trips.

⁹⁵ 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

As discussed above, the Project represents the expansion of an existing school within a semi-urbanized area that would concentrate school uses near residential areas. Furthermore, the Project would provide bicycle parking spaces consistent with LAMC requirements. These project features would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual development projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. As discussed above, the Project Site currently has 13 parking spaces which are EV ready and three spaces which have EV charging equipment. With the continued retention of these parking spaces under the Project, the Project would support the alternative fueled vehicle policy initiative.

Energy Efficiency Strategies and Policies

One goal within the 2020–2045 RTP/SCS for individual developments, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. All Project lighting systems would meet current Title 24 Energy Standards through use of LED bulbs which would reduce energy usage and, thereby, reduce associated greenhouse gas emissions and help minimize the impact on natural resources and infrastructure. The sustainability features to be incorporated into the Project would include, but not be limited to, reduction of outdoor water use; drip irrigation systems; and water-efficient landscape design including drought tolerant plants. Restroom fixtures would also comply with the City of LA Green Building code which requires a 20-percent reduction in water usage based on the City of LA Plumbing Code. The Project would also use LID techniques to minimize the amount of stormwater that leaves the Project Site.

Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHGs. In order to assess the Project's potential to conflict with the 2020–2045 RTP/SCS, this MND also analyzes the Project's land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as the 2020–2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The Project's consistency with the applicable goals and principles set forth in the 2020–2045 RTP/SCS is discussed in Checklist Section XI, Land Use and Planning, of this MND. As shown in Checklist Section XI, the Project is consistent with the goals and principles set forth in the 2020–2045 RTP/SCS.

In sum, the Project is a land use development that is consistent with the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term

climate policies.⁹⁶ By furthering implementation of SB 375, the Project would support regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS. Overall, the Project would not conflict with the 2020–2045 RTP/SCS, which is intended to reduce GHG emissions.

City of Los Angeles Sustainable City pLAn/City of LA Green New Deal

The City of Los Angeles began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan/ClimateLA) in 2007. This plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Building Code, as discussed below.

Building upon the LA Green Plan, the Sustainable City pLAn was adopted in 2015 and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure in their control, and provides specific targets related to mobility and transit, including the reduction of VMT per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025. Although the Sustainable City pLAn mainly targets GHG emissions related to City-owned buildings and operations, certain reductions would also benefit the Project. Such measures include increasing renewable energy usage to 100 percent by 2045 which would reduce energy related emissions. In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. This updated document, known as the City's Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals such as the installation of 10,000 publicly available EV chargers by 2022 and 28,000 by 2028.⁹⁷

The Project would generally be consistent with these aspirations, as the Project would comply with CALGreen, implement various project design features to reduce energy usage, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan. Furthermore, the Project would comply with the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. Therefore, the Project would be consistent with the Sustainable City pLAn.

In addition, the Project would use LED lighting to minimize use of electricity and would use native and drought-tolerant plant species in the landscaping to minimize water use. The Project Site currently has 13 parking spaces which are electric vehicle (EV) ready and three spaces with EV-charging stations to assist in the reduction of GHG emissions from vehicles. Installation of EV-charging stations would also be consistent with the L.A. Green New Deal goal of increasingly publicly available EV charging infrastructure.

⁹⁶ As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.

⁹⁷ City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

These EV charging stations would facilitate trips in zero emission vehicles, resulting in a reduction of GHG emissions.⁹⁸ Therefore, the Project would be consistent with the Sustainable City pLAn and the L.A. Green New Deal.

Conclusion

In conclusion, the Project would not generate GHG emissions that may have a significant impact on the environment nor would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Specifically, the Project would not conflict with the emission reduction measures discussed within CARB's Scoping Plan and subsequent updates, particularly their emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan and updates, the Project would use "green building" features consistent with the CalGreen Building Code. As discussed above, the Project would generate only a small number of new vehicle trips that would not result in any VMT impacts and would also not conflict with SCAG's 2020–2045 RTP/SCS. Furthermore, as detailed above, the Project would use LED lighting to minimize use of electricity, use native and drought-tolerant plant species in the landscaping to minimize water use, and would retain existing EV ready and EV-charging stations to assist in the reduction of GHG emissions from vehicles. As such, the Project would comply with the Sustainable City pLAn/L.A.'s Green New Deal. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts related to GHG emissions would be less than significant, and no mitigation measures are required.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

⁹⁸ However, as a conservative assumption, the GHG analysis did not take credit for this reduction.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	☐	☐	☒	☐
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Unless as otherwise indicated, the following analysis is based on three technical reports prepared for the Project: the Phase I Environmental Site Assessment (Phase I ESA) prepared by Partner Engineering and Science, Inc. (Partner) dated August 28, 2020; the Methane Survey Report prepared by Partner dated January 30, 2019; and the Methane and Landfill Gas Mitigation Plan prepared by Geosyntec Consultants dated April 2021. These technical reports are included as Appendices 9, 10, and 11, respectively, of this MND. Unless otherwise indicated, the information in the following is from these reports.

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

Less Than Significant Impact. The Project Site is currently developed with eight academic buildings, including a gymnasium and cafeteria, vehicular and bicycle parking, play fields/courts, courtyards, and landscaping. On-site operations consist of classroom instruction, outdoor school activities, food preparation and service, and routine facility landscape maintenance. The three largest academic buildings were developed in 1971, with gym, storage room, classroom and library additions in 1975 and 1981. In addition, according to ZIMAS, additional smaller buildings/structures were constructed between 1991 and 1993.⁹⁹ The immediately surrounding properties include Bel Air Presbyterian Church to the north across Mulholland Drive, Berkley Hall School to the south across a fire road and undeveloped ridge, undeveloped hillside and ridge area to the east, and Westland School and a large surface parking lot followed by an open field and then a residential subdivision to the west.

⁹⁹ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

No settling ponds, lagoons, surface impoundments, wetlands, natural catch basins, above-ground storage tanks (ASTs), septic systems, or evidence of wells, cisterns or illegal dumping were observed on the Project Site during the field reconnaissance conducted for the Phase I ESA. Furthermore, according to the interviews with the key site manager, there are no underground storage tanks (USTs), ASTs, clarifiers, oil/water separators, groundwater monitoring wells, or hazardous substances use, storage or generation on the Project Site. Also, while two sewage waste disposal tanks (part of the small on-site wastewater lift station discussed in Checklist Section XIX, Utilities and Service Systems, later in this MND) collect sewage generated at the Project Site which is then pumped to the municipal sanitary sewer system, no industrial processes are currently performed on-site such that the holding tanks are not considered an environmental concern. Furthermore, no evidence of hazardous materials releases, and no evidence of the use of reportable quantities of hazardous substances, were observed on the Project Site during the site reconnaissance.

Older transformers and other electrical equipment sometimes contain Polychlorinated biphenyls (PCBs) at levels that subjects them to regulation by the U.S. EPA. PCBs in electrical equipment are controlled by United States Environmental Protection Agency regulations 40 CFR, Part 761. Under the regulations, there are three categories into which electrical equipment can be classified: (1) Less than 50 parts per million (ppm) of PCBs—"Non-PCB"; (2) 50 ppm to 500 ppm—"PCB-Contaminated"; and (3) Greater than 500 ppm—"PCB-Containing." The manufacture, process, or distribution in commerce or use of any PCB in any manner other than in a totally enclosed manner was prohibited after July 2, 1979. One concrete pad-mounted transformer was observed during the site reconnaissance performed for the Phase I ESA. The transformer was not labeled indicating PCB content, and no staining or leakage was observed in the vicinity of the transformer. No other potential PCB-containing equipment (e.g., interior transformers, oil-filled switches, hoists, elevators, etc.) was observed on-site during the site reconnaissance. Based on the good condition of the equipment, the transformer was not expected to represent an environmental concern at the Project Site by the Phase I ESA. Furthermore, since the Phase I ESA site reconnaissance was performed, this transformer has been replaced with a new larger transformer, which has been designed and constructed to the latest safety standards, has similarly been located on a concrete pad, and is being maintained in accordance with all applicable regulations which have been formulated to provide for safe operation.

Based on the above, the continued operation of the existing facilities under the Project, and any increase in the use of maintenance and janitorial supplies at the Project Site under the Project which would continue in accordance with applicable regulations, would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The types and amounts of hazardous materials that would be used during Project construction and operation would be typical of those used for construction and operation of educational facilities, including vehicle fuels, oils, transmission fluids, paint, adhesives, surface coatings and other finishing materials, cleaning solvents, and pesticides for landscaping purposes. Some of these materials are already used at the Project Site as part of existing school operations. All potentially hazardous materials would be used and disposed of in accordance with manufacturers' specifications, as well as with all applicable federal, state, and local health and safety regulations, including, but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and State Occupational Safety and Health Acts, SCAQMD rules, and permits and associated conditions issued by LADBS. Such requirements include obtaining material safety data sheets from chemical manufacturers, making these data sheets available to employees, labeling chemical containers in the workplace, developing and maintaining a written hazard communication program, and developing and implementing programs to train

employees about hazardous materials. With adherence to these and other applicable regulatory requirements, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The impact would be less than significant, and no mitigation measures are required.

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

Less Than Significant with Mitigation Incorporated.

Hazardous Materials

An aerial photograph and historical records review conducted as part of the Phase I ESA indicates that the only development at the Project Site has been associated with Mirman School starting in 1971. During the site reconnaissance conducted as part of the Phase I ESA, no evidence of hazardous substances, ASTs, USTs, spills, stains, or other indications of surficial release, PCBs, strong pungent or noxious odors, pools of liquid, drains, sumps, or clarifiers, pits, ponds for lagoons, stressed vegetation, or environmental hazards, including landfill activities or radiological hazards, were observed or identified on the Project Site. Small quantities of general maintenance and janitorial supplies typical of school uses were found to be properly labeled. However, based on the site reconnaissance, records search, interviews, review of historical sources, and other research, the Phase I ESA identifies the following recognized environmental condition (REC) involving the Project Site:¹⁰⁰

- Partner completed a Methane Survey Report of the Project Site documented in a report dated January 30, 2019 (see Appendix 10 of this MND). The Methane Survey was requested by Mirman School to evaluate the potential impact of methane to soil gas as a consequence of off-gassing from a nearby closed landfill site. The scope of the Methane Survey Report included the advancement of four borings (B1 through B4) on the Project Site in the areas of the proposed development for the collection and analysis of soil gas samples. Soil gas probes were constructed within the borings, and methane samples were collected from borings B1 through B3 at five, 10, and 20 feet bgs, and from boring B4 at five feet bgs. Methane was detected in each of the soil gas probes at concentrations ranging from 1,000 to 92,000 parts per million by volume (ppmv). While there are no specific regulatory guidelines for methane, LADBS methane mitigation requirements for properties located in a Methane Zone (Table 71) indicate that the Project Site would meet the criteria for Level V methane mitigation design if located in a Methane Zone. Level V methane mitigation design includes sub-slab venting and depressurization upon redevelopment. Based on the results of the Methane Survey Report, Partner concluded that the Project Site appears to be affected by off-gassing from the nearby landfill which is considered a REC.

See the Off-Site Landfill Soil Gasses subsection below for further discussion of this topic.

¹⁰⁰ A recognized environmental condition (REC) refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

Based on the site reconnaissance, records search, interviews, review of historical sources, and other research, the Phase I ESA does not identify any controlled recognized environmental conditions (CRECs) or historical recognized environmental conditions (HRECs) involving the Project Site.¹⁰¹

An environmental issue refers to an environmental concern identified by Partner which does not qualify as a REC but nevertheless warrants further discussion. The following environmental issue is identified on the Project Site by the Phase I ESA:

- Due to the age of the onsite buildings, there is a potential that asbestos-containing materials (ACMs) and/or lead-based paint (LBP) are present. Readily visible suspect ACMs and LBP were observed in good condition

See the Asbestos and Lead-Based Paints subsection below for further discussion.

Oil Fields and Methane Zones

According to the Phase I ESA, the Project Site is not located within an active or inactive oil field and is not within a Methane Zone or Methane Buffer Zone identified by the City. Furthermore, the State's Geologic Energy Management Division Online Mapping System does not show any oil wells on-site or within the Project vicinity, and the nearest oil well is located approximately 3 miles west of the Project Site and is currently listed as inactive and plugged. Therefore, oil fields, oil wells, and methane zones identified by the City are not anticipated to impact the Project Site.¹⁰²

Off-Site Landfill Soil Gasses

The Project Site is located within the general vicinity of the closed Mission Canyon 1 Landfill (MC1), a portion of which is located west of Westland School and extends under the southwesternmost portion of the Bel Air Presbyterian Church-owned parking lot located immediately west of the Project Site. MC1 was operated by the Los Angeles County Sanitation District (LACSD) between 1965 and 1968, and following its closure, LACSD continues to oversee the maintenance of the closed landfill. LACSD operates a landfill gas (LFG) collection system to capture and properly dispose of LFG, which typically contains methane and may also contain trace amounts of volatile organic compounds (VOCs), generated by the landfill. LACSD maintains a series of subsurface probes, including a set of probes installed along the perimeter of the Church parking lot along the Mirman School property, to monitor for the migration of LFG from the landfill. If evidence of active LFG migration from the landfill is observed, LACSD is required to rectify

¹⁰¹ A controlled recognized environmental condition (CREC) refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. A historical recognized environmental condition (HREC) refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

¹⁰² Geosyntec Consultants, Preliminary Geotechnical Investigation for Proposed Mirman School Learning Center, January 20, 2021. Included as Appendix 7 of this MND.

issues with the LFG collection system immediately in order to discontinue LFG migration across the landfill boundary.¹⁰³

In order to determine whether LFG from MC1 could potentially affect the existing and future students, teachers and staff at Mirman School, a Landfill Gas Mitigation Plan was prepared by Geosyntec Consultants, dated May 2021 and is included as Appendix 11 of this MND. The Landfill Gas Mitigation Plan summarizes the findings of previous and current environmental investigation and LFG monitoring (including the installation and monitoring of on-site LFG probes) to determine whether LFG from the landfill has or is migrating to the Project Site and outlines measures to mitigate for potential subsurface LFG impacts at Mirman School. Below is a summary of the conclusions in the Landfill Gas Mitigation Plan:

- **Methane:** Methane was not detected in the three LFG probes and five dual-nested soil vapor probes (SVPs) at concentrations greater than 4,000 parts per million by volume (ppmv) during four recent sampling events (as compared to the 50,000 ppmv permissible limit for subsurface methane migrating from a landfill established in 27 CCR Section 20921), indicating that the elevated concentration of methane previously detected during the 2018 Methane Survey was anomalous and does not represent typical Project Site conditions. It is anticipated that the previous detections of methane at concentrations of up to 92,000 ppmv in one location were the result of transitory Project Site conditions associated with a temporary failure of the MC1 LFG collection system or similar circumstances. Notwithstanding, Mirman proposes to implement methane mitigation strategies for the Project Site's new and existing buildings. Specifically, due to the anomalous nature of this prior elevated methane detection, and because methane mitigation infrastructure installed at the Project Site would serve as a secondary line of defense behind the active collection system at MC1, a methane mitigation design equivalent to Site Design Level III under the City of Los Angeles' Methane Code is recommended to be sufficient for existing and future structures at the Site. LADBS has reviewed Mirman's proposed methane mitigation design and has concurred that Site Design Level III is appropriate for the Site, as documented in Appendix A of the Landfill Gas Mitigation Plan.
- **VOCs:** Low-level concentrations of VOCs detected in LFG monitoring probes and dual-nested SVPs were all below the School-specific soil vapor screening levels (SVSLs) developed for the Project Site, and therefore do not present an unacceptable risk to Project Site occupants resulting from soil vapor intrusion into overlying structures. While already considered negligible, the risk posed by VOCs generated by MC1 would be further negated by the LFG mitigation systems planned for construction at the Site. Because the SVPs were constructed along the perimeter of the Project Site closest to the VOC source area (i.e., MC1), the concentrations detected in samples collected from these features can be considered representative of the overall highest concentrations of VOCs likely to be present in the Site subsurface. While these concentrations may temporarily increase in the event of a LFG migration event, LFG probes along MC1's perimeter are monitored on at least a quarterly basis, and in the event of active LFG migration from the landfill, LACSD would be required to rectify issues with the LFG collection system immediately in order to discontinue LFG migration across the landfill boundary. Therefore, because the human health risk associated with exposure to VOCs is evaluated based on long-term chronic exposure scenarios, and present-day concentrations of VOCs do not present an unacceptable risk to Project Site occupants due to soil vapor intrusion under these long-term exposure scenarios, the additional

¹⁰³ Geosyntec Consultants, Landfill Gas Mitigation Plan for the Mirman School Learning Center, May 2021.

risk associated with a short-term increase in subsurface VOCs due to an LFG migratory event is considered negligible. The California Department of Toxic Substances Control (DTSC) has reviewed the data regarding concentrations of VOCs detected in the Project Site subsurface and has concurred that these concentrations do not pose a threat to public health or the environment, as documented in Appendix B of the Landfill Gas Mitigation Plan. Notwithstanding, the methane mitigation proposed by Mirman would further minimize concentrations of VOCs in the existing and proposed Mirman School buildings.

Based on the above, the following mitigation measures are proposed:

Mitigation Measure HAZ-1: Site Design Level III passive LFG mitigation infrastructure (sub-slab systems) shall be constructed by Mirman School for future buildings using LADBS's Methane Hazard Mitigation Standard Plan to protect against potential accumulation and intrusion of contaminants of concern (COCs) associated with LFG (i.e., methane and VOCs) into these structures. LADBS has provided written concurrence with the plan for mitigation infrastructure installed in future buildings to be constructed in accordance with Site Design Level III standards (Appendix A of the Landfill Gas Mitigation Plan), which have a design methane concentration of 1,001 to 5,000 ppmv. These systems are anticipated to consist of the following primary components:

- A network of perforated sub-slab horizontal vent pipes to collect encroaching LFG;
- A permeable gravel blanket below an impervious membrane to promote flow of LFG into the perforated horizontal pipe network and prevent potential upward flow of LFG into overlying buildings; and
- Vent risers to safety vent LFG and prevent potential buildup of LFG below the structures.

The LFG mitigation infrastructure shall be constructed in accordance with LADBS's written approval letter, Standard Plans, and the Methane Code, as applicable. The LFG mitigation infrastructure design shall be submitted to LADBS and LAFD for review prior to construction of the Project.

Mitigation Measure HAZ-2: Active sub-slab depressurization (SSD) mitigation systems shall be installed in the existing Mirman School buildings by Mirman School to mitigate potential intrusion of methane and VOCs. SSD is a common mitigation approach that consists of applying a continuous vacuum to the shallow subsurface to induce a constant absolute pressure in the sub-slab interval that is less than the absolute pressure within the overlying structure. The vacuum is typically induced through a series of "depressurization pits" or similar features, from which air is constantly extracted using a fan or blower to induce the desired vacuum. Extracted air from the sub-slab interval containing methane, VOCs, and/or other compounds is collected and piped to an ambient air discharge point. The SSD mitigation infrastructure design shall be submitted to LADBS and LAFD for review prior to implementation.

Mitigation Measure HAZ-3: During construction at the Project, controls shall be put in place by Mirman School to mitigate the effects of subsurface gases on workers and the public in accordance with OSHA standards, which could otherwise result in potential explosivity hazards, asphyxiation hazards, and/or other hazards. During construction, the following controls shall be implemented:

- Gas monitoring devices for measuring LEL, oxygen, and VOCs in ambient workspace air shall be present to alert workers to potential elevated explosive gas concentrations, potential asphyxiation hazards, and/or potential hazards associated with elevated VOCs when subsurface soil disturbing work is being performed.
- Procedures shall be in place if elevated explosive gas concentrations, oxygen-deficient conditions, or significantly elevated VOCs are detected, such as evacuating the area and/or increasing ventilation within the immediate work area where elevated methane or VOC concentrations are detected, or requiring the use of additional personal protective equipment (PPE), such as respirators, when working in areas with elevated VOC concentrations.
- A Health and Safety Plan (HASP) shall be developed. The HASP shall describe the work activities and hazards associated with each work activity. Hazard mitigation shall be presented in the HASP to limit construction risks to workers. The HASP shall have emergency contact numbers, maps to the nearest hospital, action levels and response actions related to methane, oxygen and specific VOC gas concentrations, allowable worker exposure times, and mandatory PPE requirements. The HASP shall be signed by all workers onsite to demonstrate their understanding of the potential construction risks.
- Workers shall be trained to identify exposure symptoms and implement response actions when detections exceed levels indicated in the HASP.
- Soil exposed during excavations shall be minimized to reduce the surface area that could off-gas, which shall be done by staggering exposed excavation areas; and
- Distance between the public and excavation activities shall be provided to allow for oxidation and dilution of subsurface gas emissions, if any; therefore, exclusion zone fencing shall be established to limit public access.

Mitigation Measure HAZ-4: An O&M Plan shall be developed for each LFG mitigation system. The O&M Plan shall incorporate the maintenance and service procedures for the LFG mitigation features implemented for the Project. Typical elements to be included in the O&M Plan shall be regular maintenance and monitoring of the system, including calibration and replacement of sensors, monitoring of SSD/venting system(s) for clogs or damage, repair observations, monitoring of gas probes, monitoring of standard system parameters (i.e., flow rates, vacuum, methane/VOC concentrations, etc.), and performing other routine maintenance, as needed. Annual O&M Reports shall be prepared, summarizing the previous year's operation(s), maintenance, and monitoring activities and shall be maintained on-site for LADBS review upon request.

Mitigation Measure HAZ-5: In accordance with the Methane Code, an Emergency Plan shall be developed by Mirman School to address emergency situations resulting from explosive gas detections. The Emergency Plan shall identify the responsible individual for interfacing with LAFD in the establishment, describe emergency procedure implementation, and discuss on-going updates to the Emergency Plan. Conspicuous postings of the LAFD phone number and emergency plan procedures in locations designated by LAFD shall be outlined in the Emergency Plan. The Emergency Plan shall to LAFD for review and approval.

Asbestos and Lead-Based Paints

ACM and LBPs are toxic materials that have been regulated as building materials since 1981 and 1978, respectively. Based on the age of the buildings on-site (e.g., the three largest buildings were constructed in or around 1971), the Phase I ESA indicates that there is the potential that existing on-site buildings contain ACMs and LBPs (the buildings have not been previously tested for ACMs and LBPs). During the site reconnaissance conducted for the Phase I ESA, which included a limited visual evaluation for the presence of suspect ACMs, readily-accessible structures and painted surfaces were observed to be in good condition and did not appear to pose a health and safety concern. However, if some of the existing on-site buildings to be altered under the Project contain ACMs or LBPs (such as the existing Library building), such materials could potentially be released and create a significant hazard to the public or the environment. Still, in accordance with SCAQMD Rule 1403, the Project Applicant would be required to conduct a comprehensive asbestos survey prior to alteration or demolition of any structures with the potential to contain ACMs, and in the event that ACMs are found, they would be removed by a certified asbestos abatement contractor in accordance with applicable regulations. Furthermore, in accordance with 29 CFR Section 1926, 8 CCR Section 1532.1, 8 CCR Section 66261.24, etc., the Project Applicant would be required to conduct LBP surveys prior to demolition or alteration of any structures with the potential to contain LBP, with any LBP found remediated and removed in accordance with OSHA, Cal OSHA and other applicable requirements. With compliance with these requirements, the Project's ACM and LBP impacts would be less than significant.

Lead

According to the Landfill Gas Mitigation Plan, concentrations of lead detected in soil samples collected as part of the Landfill Gas Mitigation Plan were below the DTSC residential screening level of 80 mg/kg. Therefore, soil lead concentrations do not pose a health concern for Site occupants. Based in part on these results, further environmental investigation of the Project Site is not required by the DTSC (Appendix B of the Landfill Gas Mitigation Plan).¹⁰⁴

Radon

According to the Phase I ESA, review of the US EPA Map of Radon Zones places the Project Site in Radon Zone 2. Based upon this radon zone classification, the Phase I ESA concludes that radon is not considered to be a significant environmental concern at the Project Site.

Conclusion

Based on the above, with compliance with regulatory requirements and implementation of Mitigation Measures HAZ-1 through HAZ-5, the Project would not result in a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. As such, impacts would be less than significant.

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

¹⁰⁴ Geosyntec Consultants, Landfill Gas Mitigation Plan for the Mirman School Learning Center, May 2021.

Less Than Significant Impact. Three schools are located within 0.25 mile of the Project Site, including the Bel Air Presbyterian Preschool to the north, Westland School to the west, and Berkeley Hall School to the south. As discussed under Checklist Question IX.a above, limited quantities of potentially hazardous materials would be used during construction and operation of the Project, but the use of such materials would be typical of those used in the construction and operation of education facilities, and would occur in accordance with applicable regulations, such that their use would not pose a hazard to the students, faculty, and staff of Mirman School and the surrounding schools. In addition, no acutely hazardous materials, substances, or waste would be handled on-site subsequent to Project implementation, nor would Project operations result in the emission of hazardous emissions. As discussed under Checklist Question IX.b above, the Project would include the alteration and/or demolition of buildings (such as the existing Library) that may contain ACMs and LBPs; however, compliance with applicable regulatory requirements would avoid any potential for an associated release of these materials into the environment. As such, impacts with regard to the emission or release of hazardous materials within one-quarter mile of an existing or proposed school would be less than significant.

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

Less Than Significant Impact. California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a “list” of hazardous waste sites and other contaminated sites. While California Government Code Section 65962.5 makes reference to the preparation of a “list,” many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the California Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions or extensive investigations are planned or have occurred. The database provides a listing of federal Superfund sites, State Response sites, voluntary cleanup sites, and school cleanup sites.

The Phase I ESA includes the results of consultation with local agency representatives and a review of available federal, State, and local regulatory databases conducted by EDR including, but not limited to, EnviroStor database, Geotracker, ZIMAS, and the Geologic Energy Management Division database. As indicated therein, while the Project Site is not identified on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, it is identified on several other regulatory databases, including the following: Resource Conservation and Recovery Act (RCRA) Waste Generator/No Longer Regulated (NonGen/NLR); Facility Index System/Facility Registry System (FINDS); Enforcement and Compliance History Information (ECHO); National Pollutant Discharge Elimination System (NPDES); and Hazardous Waste Tracking System (HWTS).

According to the HWTS database, the school is listed with an inactive US EPA hazardous waste generator ID, which was only active for the year 2019. No waste manifest data is provided in the HWTS database; however, DTSC records indicate that 1.15 tons of asbestos-containing waste was transported off-site for disposal at a landfill or surface impoundment in 2019. Consistent with this listing, the RCRA NonGen/NLR listing identifies the school as a nongenerator of hazardous waste as of 2019. Nongenerators do not presently generate hazardous waste, and no violations are reported in the RCRA database. The FINDS and ECHO database listings are also related to the School’s inclusion on the RCRA database. Finally, according to the NPDES listings, the school obtained a NPDES permit for stormwater

runoff control associated with construction activities, which expired on November 5, 2015. The Project is not listed on any databases indicative of a release of hazardous substances. Based on the cessation of hazardous waste generation at the Project Site, the limited duration of hazardous waste generation in only one year, the nature of the NPDES permit related to construction activities, and the absence of documented violations or releases, the on-site regulatory database listings above are not expected to represent an environmental concern at the Project Site.

In addition, the adjacent properties to the north and west are identified in the Underground Storage Tank (UST) database, while the adjacent property to south is identified in the Los Angeles Hazardous Materials Reporting Facility (HAZMAT) database. Each of these is discussed further below:

- The property at 16220 Mulholland Drive is located adjacent to the north of the Project Site across Mulholland Drive. This site is listed as a historical UST site with a last run date of January 1, 1900. The site is not listed on any of the databases indicative of a release of hazardous substances, including the Leaking Underground Storage Tank (LUST) database. Based on the lack of reported releases, local depth to groundwater and hydraulic location with respect to the subject property, this listing is not expected to represent an environmental concern at the Project Site, and it is unlikely that a regulatory file review for this site would alter the findings of this assessment.
- The property at 16190 Mulholland Drive is located adjacent to the west of the Project Site. This site is listed as a historical UST site with a last run date of January 1, 1900. The site is not listed on any of the databases indicative of a release of hazardous substances, including the Leaking UST (LUST) database. Based on the lack of reported releases, local depth to groundwater and hydraulic location with respect to the subject property, this listing is not expected to represent an environmental concern at the Project Site, and it is unlikely that a regulatory file review for this site would alter the findings of this assessment.
- The property, identified as Verizon Wireless and Sprint Cell Site at 16000 Mulholland Drive, is located adjacent to the south of the Project Site. This site is listed as an active HAZMAT site with a last run date of June 1, 2019. The site is not listed on any of the databases indicative of a release of hazardous substances. Based on the regulatory oversight and the lack of reported releases, this listing is not expected to represent an environmental concern at the Project Site, and it is unlikely that a regulatory file review for this site would alter the findings of this assessment.

Based on the above, the regulatory listings on adjacent properties are not expected to represent an environmental concern at the Project Site at this time.

Lastly, no USTs, ASTs, or gas/oil wells, and no hazardous materials releases, have been recorded at the Project Site.

Based on the above, the Project Site is not identified on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and its identification on several other regulatory databases would not create a significant hazard to the public or the environment. Therefore, the impact would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is not located within an area subject to an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site is Van Nuys Airport, located approximately 4.5 miles north of the Project Site. The Project Site is located within the City-designated “550’ Height Limit Above Elevation 747”.¹⁰⁵ However: (1) the Project would not develop new uses above the existing ridges abutting the Project Site; and (2) given the distance between the airport and the Project Site, the Project would not result in a safety (i.e., navigation) hazard or excessive noise for people residing or working in the Project area. Therefore, no impact would occur, and no mitigation measures are required.

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

Less Than Significant Impact. The City of Los Angeles’ General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. Exhibit H identifies the I-405 Freeway and Sepulveda Boulevard in the Project Site vicinity as designated evacuation routes, but not Mulholland Drive (Mulholland Drive is identified as a designated evacuation route only east of the I-405 Freeway).¹⁰⁶

The Project would not alter any designated evacuation routes. Furthermore, Project construction activities would be confined to the Project Site and would not occur along designated evacuation routes or impede access to other nearby uses. Emergency access to the Project Site during construction would be maintained via Mulholland Drive and by the existing fire lane connecting the Project Site to Berkeley Hall School to the south. Furthermore, the Project would implement a Construction Traffic Management Plan, discussed further in Checklist Section XVII, Transportation, of this MND (specifically, Mitigation Measure TR-7), to ensure adequate and safe access along Mulholland Drive, the Project Site, and adjacent properties is maintained during construction. The Project would also be required to comply with all City and state building, fire and safety codes, and with the standards of the City of Los Angeles Fire Department (LAFD) for emergency access. Lastly, the Project would not install barriers that would impede access to the Project Site and vicinity, nor would it result in the temporary full closure or permanent closure of Mulholland Drive or any other streets in the vicinity of the Project Site. Accordingly, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan. Impacts would be less than significant, and no mitigation measures are required.

¹⁰⁵ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁰⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit H, p. 61.

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

Less Than Significant Impact. The Project Site is located within a City-designated Very High Fire Hazard Severity Zone portion of the Mountain Fire Districts.^{107,108} Hence, the Project Site is subject to wildland fires. However, the Project has been designed to include fire-resistive design and construction features, including the new Learning Center being designed as Type IV Construction featuring fire-resistive Cross Laminated Timber (CLT) beams and columns, and would incorporate fire-resistive exterior materials including porcelain ceramic tiles and an aluminum louver system with simulated wood appearance. Moreover, the Project Site is surrounded on all sides by urban development, multiple existing fire hydrants are located on and adjacent to the Project Site, and the proposed improvements would be confined to the existing development footprint of the school and would mostly be set back from the undeveloped hillsides of the Project Site. Furthermore, multiple routes are available into and out of the campus, including Mulholland Drive to the north and a secondary emergency fire lane leading to the Berkeley Hall School to the south. In addition, the Project would comply with applicable provisions of the City's Fire Code (Chapter V, Article 7 of the LAMC) and Building Code, including the installation of fire sprinklers, water line improvements, and connections in new buildings, as required, as well as the provision of sufficient emergency access and fire lane widths to ensure that fire suppression and access would be adequate to serve the Project. Additional Project specific requirements, as mitigated herein (see Checklist Section XX, Wildfire, of this MND) have been recommended by the LAFD. Lastly, all projects in the City located within a designated Very High Fire Hazard Severity Zone portion of the Mountain Fire District are required to comply with the requirements set forth in LAMC Section 57.25.01. These requirements include controls on the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. With compliance with these requirements, which have been formulated to protect development against wildland fires, impacts associated with wildland fires would be less than significant.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

¹⁰⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁰⁸ City of Los Angeles, Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit D, p. 53.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Unless otherwise indicated, the following analysis is based on the Mirman School for Gifted Children Water Resources Technical Report dated July 2021, prepared by KPFF Consulting Engineers and included as Appendix 12 of this MND.

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

Less Than Significant Impact. The Project Site lies within the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's Clean Water Act (CWA) Section 303(d) List include cadmium (sediment), chlordane (tissue & sediment), coliform bacteria, copper (dissolved), cyanide, lead, PCBs, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc. No total maximum daily load (TMDL) data have been recorded by EPA for this waterbody. According to the Los Angeles Regional Water Quality Control Board (LARWQCB) Basin Plan, the beneficial uses defined in the Basin Plan are identified in water bodies within the Ballona Creek Watershed. Of these, the beneficial uses for the waters within the Ballona Creek Estuary, where surface water flows from the Project Site ultimately discharge, include navigation, commercial and sport fishing, estuarine habitat, marine habitat, wildlife habitat, preservation of rare and endangered species, fish migration, fish spawning, shellfish harvesting, water contact recreation, and non-contact water recreation. TMDLs for the Ballona Creek Estuary include cadmium, chlordane, coliform bacteria, copper, DDT, lead, polycyclic aromatic hydrocarbons (PAHs), PCBs, sediment toxicity, shellfish harvesting, silver and zinc.

The 5.46-acre Project Site (6.02¹⁰⁹ acres including the proposed LLA) is currently developed with approximately 42,678 square feet of floor area, as well as parking lots, playfields, and pedestrian paths, with undeveloped hillsides in the eastern and southern portions of the site. The Project would include 1.45 acres of disturbance as indicated in Figure 15, 12,600 cy of grading, and a net increase in on-site development of 22,508 square feet of school uses (slightly less under the Alternative LLA Scenario). This development would be largely located within the relatively flat existing development footprint of the school as indicated in Figure 4. During Project construction, particularly during the grading phase, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems, and on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. However, as Project construction would disturb more than 1 acre of soil, the Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. The SWPPP would set forth Best Management Practices (BMPs) for stormwater and non-stormwater discharges, including, but not limited to, sandbags, storm drain inlets protection, stabilized construction entrance/exit, wind erosion control, and stockpile management, to minimize the discharge of pollutants in stormwater runoff during construction. The SWPPP would be carried out in compliance with State Water Resources Control Board (SWRCB) requirements and would also be subject to review by the City for compliance with the City of Los Angeles' *Best Management Practices Handbook, Part A Construction Activities*. In addition, Project construction activities would occur in accordance with City grading permit regulations (Chapter IX, Division 70 of the LAMC), such as the preparation of an erosion control plan, to reduce the effects of sedimentation and erosion. Furthermore, groundwater in the vicinity of the Project Site is inferred to be approximately 100 to 300 feet bgs¹¹⁰, and no groundwater was encountered in the five on-site borings extending to between 21.5 and 32 feet bgs for the Geotechnical Investigation included as Appendix 7.1 of this MND. As previously discussed, the Project's maximum excavation would reach 15 feet bgs (with cylindrical drilling for caissons up to 20 feet bgs). Therefore, it is not anticipated that dewatering would be required during Project construction. If perched groundwater were encountered during construction, temporary pumps and filtration would be utilized in compliance all applicable regulations and requirements, including with all relevant NPDES requirements related to construction and discharges from dewatering operations. Lastly, while other types of risks such as underground storage tanks have the potential to impact groundwater quality, there is no record of fuel or hazardous materials-containing underground storage tanks at the Project Site as indicated in Checklist Section IX, Hazards and Hazardous Materials, of this MND. As such, the Project would not substantially affect surface or groundwater quality during project construction.

As with existing conditions, operation of the Project would result in the potential for urban pollutants to be conveyed into nearby storm drains during stormwater events. While no new parking areas would be developed, the usage of existing school parking areas would be expected to increase which could contribute additional pollutants to stormwater runoff. However, the Project would include 22,508 square feet of new floor area, only approximately 0.3 acre of additional impervious surfaces (e.g., an increase of on-site impervious surfaces from 32 to 36 percent of the Project Site), and would generate a net increase in Q50 runoff flow of only 0.19 cfs (only an approximately 0.7 percent increase in runoff from the Project Site). The potential for both the generation and deposition of operational pollutants to the

¹⁰⁹ All the flow calculations in this analysis are for the 6.02-acre Project Site (i.e., the Project Site including the LLA area).

¹¹⁰ Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report for Mirman School, August 28, 2020. Included as Appendix 9 of this MND.

surface water or groundwater would thus be minimal, and the existing landscaped and undeveloped areas of the Project Site would continue to naturally treat the runoff from the developed portions of the site. In addition, the proposed school use is not among the types of uses (e.g., manufacturing, industrial, landfill, expansive parking lot, etc.) most often associated with the deposition of pollutants to surface water or groundwater. The school also currently has structural (e.g., trench drains and area drains with screens and other treatment devices, and turfed catch basins in the playfields) and non-structural (e.g., regular trash collection, spill prevention and response, proper storage of hazardous materials/waste, and substituting hazardous productions with environmentally friendly products wherever possible) water quality BMPs in place, and these would be retained and expanded to cover the Learning Center and other proposed new facilities. Furthermore, in accordance with the City's Low Impact Development (LID) Ordinance (Ordinance No. 181,899), additional BMPs would be implemented on-site. These BMPs, which would be required to capture, store and reuse an equivalent runoff volume produced from the greater of the 85th percentile storm event and the 0.75-inch storm event, could include the placement of filters in catch basins to capture debris, oil, and other pollutants, stenciling of on-site storm drain inlets, etc. to address City and State water quality requirements. Also, the City's stormwater discharges to the Ballona Creek Estuary are required to comply with the TMDLs for the Estuary, and the City achieves this compliance through the application of regulatory BMPs and other requirements on individual development projects and the application of additional BMPs to the stormwater, as required, prior to discharge. Lastly, groundwater in the vicinity of the Project Site is inferred to be relatively deep (e.g., approximately 100 to 300 feet bgs).¹¹¹ Therefore, there would not be a potential to substantially affect surface quality during Project operation.

With regard to impacts to groundwater quality during operation, operational activities that could affect groundwater quality include spills of hazardous materials and leaking underground storage tanks. No underground fuel or chemical storage tanks are currently operated or would be operated under the Project. In addition, while the development of the proposed uses would increase the on-site use of small quantities of hazardous materials: (1) this increase would be extremely limited given the scale of the proposed improvements (e.g., 22,508 square feet of new floor area); (2) the types of hazardous materials would be restricted to cleaning solutions and other materials common to school uses rather than acute hazardous materials; and (3) compliance with all applicable existing regulations regarding the handling and potentially required cleanup of hazardous materials would prevent substantial risk to groundwater quality. Furthermore, the Project would not include the installation or operation of water wells or any extraction or recharge system in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project would also not involve drilling to or through a clean or contaminated aquifer (in fact, the Project Site is located upstream of but does not directly overlay a groundwater aquifer). Lastly, the Project would not be anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.

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

¹¹¹ Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report for Mirman School, August 28, 2020. Included as Appendix 9 of this MND.

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

Less Than Significant Impact. According to the Geotechnical Investigation included as Appendix 7.1 of this MND, no groundwater was encountered in the exploratory borings at the Project Site which extended from between 21.5 and 32 feet bgs.¹¹² Also, groundwater in the vicinity of the Project Site is inferred to be relatively deep (e.g., approximately 100 to 300 feet bgs).¹¹³ Given that the maximum depth of proposed grading and excavations are 15 feet bgs, with cylindrical drilling for Learning Center caissons to 20 feet bgs, it is not anticipated that dewatering would be required during construction or operation. In addition, while the Project Site is located upstream of the Santa Monica Subbasin portion of the Los Angeles Coastal Plain Groundwater Basin as indicated in Figure 3 of the Water Resources Technical Report, there are no groundwater production wells, public water supply wells, or spreading grounds within 1 mile of the Project Site. Furthermore, as indicated previously, the Project would only increase impervious surfaces at the 5.46-acre Project Site (6.02 acres with the proposed LLA) from 32 to 36 percent (e.g., only an approximately 0.3-acre increase), meaning that the majority of the Project Site is and would remain as pervious surfaces under the Project which would maximize the percolation of rainwater and irrigation water to the groundwater. Also, the Project would result in only a minimal increase in water demand and does not propose water wells. Finally, the Project Site does not directly overlay a groundwater aquifer. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would not impede sustainable groundwater management of the Basin. As such, the impact would be less than significant, and no mitigation measures are required.

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

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

Less Than Significant Impact. As indicated previously, the 5.46-acre Project Site (6.02 acres with the proposed LLA) is currently developed with 42,678 square feet of academic building floor area, as well as parking lots, playfields, and pedestrian paths, with undeveloped hillsides in the eastern and southern portions of the site. Approximately 32 percent of the Project Site is currently in impervious surfaces. As indicated in Figure 2 of the Water Resources Technical Report, stormwater from the eight existing drainage areas of the Project Site is currently conveyed via sheet flow and several on-site storm drains, open channels and on-site catch basins to off-site storm drains, with stormwater in the northern portion of the site draining to an existing City 18-inch west-draining storm drain in Mulholland Drive and stormwater in the southern portion of the site draining to a low point along the existing fire access lane in the southwestern portion of the Project Site which then drains via sheet flow across the Church parking lot, etc., to an existing City 54-inch southwest-draining storm drain located approximately 400 feet west of the Project Site. Much of the stormwater flow from Drainage Area 7 (e.g., the most recently developed portion of Mirman School with the basketball court, athletic field, and adjacent hardscape) is currently captured and treated prior to its use for landscape irrigation, with the unused flow diverted to the 18-inch

¹¹² Geosyntec Consultants, Preliminary Geotechnical Investigation for proposed Mirman School Learning Center, January 20, 2021. Included as Appendix 7 of this MND.

¹¹³ Partner Engineering and Science, Inc., Phase I Environmental Site Assessment Report for Mirman School, August 28, 2020. Included as Appendix 9 of this MND.

storm drain in Mulholland. According to the HydroCalc modeling conducted for the Project, the existing stormwater flow from the Project Site during a 50-year storm event (e.g., Q50 flow) is 26.06 cubic feet per second (cfs).

Construction activities associated with the Project, which would involve grading, trenching for new utility lines, and construction of the proposed Learning Center and other Project improvements, have the potential to temporarily alter existing drainage patterns on the Project Site by exposing the underlying soils, modifying flow direction, and making the Project Site temporarily more permeable. However, as discussed under Checklist Question X.a above, the Project would be required to obtain coverage under the NPDES Construction General Permit. The SWPPP prepared pursuant to this permit requires BMPs and erosion control measures to be used during construction to manage runoff flows so that runoff would not impact off-site drainage facilities and receiving waters. In addition, the Project would be required to comply with all applicable City permit regulations, erosion control plans, LID, and inspections to reduce sedimentation and erosion.

With regards to operation, the Project would create one additional drainage area on the Project Site as indicated in Figure 3 of the Water Resources Technical Report (i.e., Drainage Area 9 which covers the existing outdoor amphitheater area and the parking lot portion of the LLA area (i.e., the sites of the proposed student seating area and storage/trash/recycling enclosure, respectively). The Project would increase impervious surface at the Project Site by approximately 0.3 acre, or from 32 to 36 percent of the Project Site, meaning that the majority of the Project Site is currently and would continue to be in pervious surfaces under the Project. This increase in impervious surfaces would increase the Q50 flow from the Project Site by an estimated 0.19 cfs, or from 26.06 to 26.25 cfs (an approximately 0.7 percent increase). This minimal increase in stormwater runoff would have associated with it only a minimal potential to cause erosion or siltation. In addition, as indicated in Figure 3 of the Water Resources Technical Report, the existing pattern of surface water runoff at the Project Site would remain largely unchanged, with surface water runoff from the northern portion of the site continuing to drain to the existing 18-inch Mulholland Drive storm drain and runoff in the southern portion of the site continuing to drain to the low point along the fire access road and then to the 54-inch storm drain via the existing Church parking lot, etc. In addition, site runoff would continue to be processed through water quality BMPs, and a portion of this flow would continue to be re-used for on-site irrigation. Also, the incremental increase in the Q50 flow in Drainage Area 4 (where the Learning Center building is proposed) would be directed to catch basins and then a capture and use cistern for re-use for on-site irrigation, with only any overflow from the system directed to the existing 54-inch storm drain. Furthermore, in accordance with requirements of the City's LID Ordinance, additional BMPs would be implemented throughout the operational life of the Project, as required, to reduce erosion and siltation (as well as urban pollutants). Lastly, no streams or rivers bisect the Project Site, and as such, the Project would not alter the course of a stream or river.

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

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

Less Than Significant Impact. As discussed under Checklist Question X.c.i above, the Project would increase in the number of drainage areas on the Project Site from eight to nine (the ninth being the area of the existing amphitheater and Church parking lot portion of the LLA that would be developed with the

proposed student seating area and storage/trash/recycling enclosure, respectively). As further discussed therein, the Project would increase impervious surfaces at the Project Site by approximately 0.3 acre which would result in a small (e.g., 0.19 cfs) incremental increase in stormwater runoff from the Project Site during the 50-year storm event. As indicated in Figure 3 of the Water Resources Technical Report, the existing drainage pattern at the Project Site would be largely maintained, with runoff from the northern portion of the site continuing to flow via sheet flow and on-site storm drains, channels and catch basins to the existing 18-inch Mulholland Drive storm drain, and runoff from the southern portion of the site continuing to flow to the low point along the fire access and then sheet across the Church parking lot, etc. to the 54-inch storm drain located approximately 400 feet to the west.

The Project would not substantially increase the rate or amount of surface runoff from the Project Site because 0.19 cfs cannot be considered a “substantial” increase, especially as this would represent only a 0.7 percent increase in the existing Q50 runoff from the Project Site. Also, the incremental increase in the Q50 flow from Drainage Area 4 (where the Learning Center building is proposed) would be directed to catch basins and then a capture and use cistern for re-use for on-site irrigation, with only any overflow from the system directed to the existing 54-inch storm drain in an orderly manner via the existing Church parking lot rather than uncontrolled flow from the Project Site. Project drainage plans would also undergo required City review and approval. Also, the majority of the Project Site would remain as permeable surfaces under the Project, thereby allowing for continued infiltration of stormwater to the ground, and even in developed areas infiltration would be maximized through compliance with the City’s LID Ordinance (for example, through the provision of permeable pedestrian pathways, extensive landscaping, etc.). Furthermore, no alterations to the existing off-site stormwater drainage infrastructure is proposed or required. Lastly, during Project construction, the required SWPPP would be implemented to avoid any flooding during construction associated with temporary changing in drainage patterns during the construction period. Therefore, the Project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The impact would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed under Checklist Questions X.c.i and X.c.ii above, the Project would increase impervious surfaces at the Project Site by approximately 0.3 acre, and would result in a small (e.g., 0.19 cfs) incremental increase in Q50 stormwater runoff from the Project Site, but would not change the existing drainage pattern at the Project Site. Runoff from the northern portion of the site would continue to flow via sheet flow and on-site storm drains, channels and catch basins to the existing 18-inch Mulholland Drive storm drain, while runoff from the southern portion of the site would continue to flow via sheet flow and on-site storm drains, channels and catch basins to the existing 54-inch storm drain with an inlet at the low point along the fire access drive.

Project construction activities, which would include an estimated 1.45 acres of soil disturbance, would have the potential to temporarily change drainage patterns at the construction sites. This, in turn, could temporarily change the ratio of Project Site stormwater runoff entering the existing off-site 18- and 54-inch storm drains serving the Project Site. In addition, grading, the stockpiling of soils, and the use of heavy construction equipment and construction chemicals during the construction period could temporarily increase erosion, sedimentation, and the potential for polluted runoff from the construction sites. However, an Erosion Control Plan and SWPPP would be implemented during the construction period, and applicable grading permit and NPDES General Construction Permit regulations would be enforced, to

ensure that runoff from the construction sites is controlled and does not result in on- or off-site flooding, that erosion and siltation from the construction sites are controlled and minimized, and that measures are implemented to ensure that any spills of fuels, construction chemicals, etc., are controlled and cleaned up before entering the storm drain system. Therefore, Project construction activities would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff, and the impact would be less than significant.

During Project operation, the impervious surfaces and Q50 stormwater flows would remain largely unchanged in on-site Drainage Areas 1–3 and 6–8 (as shown by Figures 2 and 3 and Table 3 of the Water Resources Technical Report), and the existing drainage pattern in those areas would remain largely unchanged. In on-site Drainage Area 4, where the Learning Center is proposed, the 0.3-acre increase in impervious surface would increase the percentage of impervious surfaces within this drainage area from 60 to 80 percent, and would increase the Q50 flow by 0.29 cfs. This increase in the Q50 flow would be conveyed via sheet flow and the existing on-site storm drains, channels and catch basins in Drainage Area 4 to a proposed underground capture and re-use cistern north of the Learning Center for use in on-site irrigation, with any overflow diverted to the existing 54-inch City storm drain. The only other substantive changes would be that a portion of on-site Drainage Area 5 would become part of new on-site Drainage Area 9, with the net result being a 0.4 cfs decrease and a 0.3 cfs increase in the Q50 flow from these drainage areas, respectively. The overall result of the above changes would be a 0.19 cfs (0.7-percent) increase in the Q50 flow from the Project Site under the Project (not accounting for any reduction in this flow associated with proposed catch basins and underground capture and re-use cistern in Drainage Area 4). According to the Water Resources Technical Report, this increase would be “negligible” and would be accommodated by the 54-inch storm drain. Therefore, the post-Project condition would not result in a substantial increase in peak stormwater flows to the existing off-site storm drain system. Furthermore, as indicated previously, Project drainage plans would be reviewed and approved by the City of Los Angeles Department of Public Works, Bureau of Engineering. Lastly, no improvements to the off-site storm drainage system are proposed or would be required. Therefore, Project operation would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. The impact would be less than significant, and no mitigation measures are required.

With regard to polluted runoff during Project operation, pollutant loading of runoff from the Project Site could increase as a result of increased vehicular activity in the existing parking lots and increased use of maintenance and cleaning chemicals, herbicides and pesticides. However, the Project would implement BMPs consistent with the NPDES permit to reduce pollution in stormwater discharge to levels that comply with applicable water quality standards. In addition, in accordance with requirements of the City’s LID Ordinance, BMPs would be implemented throughout the operational life of the Project to ensure that stormwater pollution is addressed. Such BMPs would include the placement of filters in catch basins to capture debris, oil, and other pollutants. Lastly, new Project facilities would be very limited in size and scope (e.g., only , 22,508 square feet of new floor area, or 0.3 acre of additional impervious surface), would generate a very limited amount of additional stormwater runoff (e.g. 0.19 cfs during the 50-year storm event), and would not include uses typically associated with polluted runoff (e.g., industrial facilities, oil refineries, landfills, etc.), such that Project operation would have a minimal potential to generate and convey polluted runoff to the existing off-site storm drain system. As such, Project operation would not provide substantial additional sources of polluted runoff. The impact would be less than significant, and no mitigation measures are required.

iv. Impede or redirect flood flows?

No Impact.

The Project Site is not located within a City of Los Angeles-designated 100-year flood plain or flood hazard area.^{114,115} The Federal Emergency Management Agency (FEMA) maintains the Flood Insurance Rate Maps (FIRM) to assess if a property is in the 100-year flood plain. According to the FIRM, the Project Site is within Zone D “Area of Undetermined Flood Hazard.” This is to be differentiated from Zone D, “Area with Flood Risk Due to Levee”, and from the several other Zone designations that identify known risks of flooding. The Project Site is at a greater altitude than nearby water bodies (Encino reservoir, Los Angeles River, Stone Canyon Reservoir, Ballona Creek) and is therefore not at risk of flooding due to failure of dams or levees, and seiche. The Project Site is also located more than 7 miles from the ocean, and at an approximate elevation of 1,300 feet, so the Project is also not expected to be at risk from tsunamis. It is unknown why FEMA as left this area as undetermined, Zone D. However, it can be assumed that, based on the above dam and levee information, in addition to the existing topography that defines natural and engineered drainage paths for stormwater as described above, the Project would not impede or redirect food flows, and the impact would be less than significant.¹¹⁶

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

Less Than Significant Impact. As discussed above, the Project Site is not located within a 100-year floodplain or designated flood hazard area.

With regard to tsunamis, the largest body of water near the Project Site is the Pacific Ocean, located approximately 7 miles southwest of the Project Site. In addition, the Project Site is not mapped by the City of Los Angeles Safety Element of the General Plan as an area potentially impacted by tsunami.¹¹⁷ Therefore, due to its distance from the Pacific Ocean and its elevation above sea level, the Project Site would not be susceptible to tsunamis.

Seiches are large waves or oscillations initiated by an earthquake in enclosed bodies of water, such as a reservoir, storage tank, harbor, or lake. A seiche wave has the potential to overflow the sides of the containing basin to inundate adjacent or downstream areas. The Encino Reservoir is located approximately 2 miles northwest of the Project Site and the Upper Stone Canyon Reservoir and the Stone Canyon Reservoir are located approximately 1.4 miles southeast of the Project Site. However, the Project Site is not located within a potential inundation area associated with the Encino Reservoir, the Upper Stone Canyon Reservoir, or the Stone Canyon Reservoir as indicated in the Safety Element of the City of Los Angeles General Plan.¹¹⁸ Furthermore, the Geotechnical Investigation prepared for the Project and

¹¹⁴ Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit F.

¹¹⁵ City of Los Angeles, Special Flood Hazards Area website, https://geohub.lacity.org/datasets/9194e6260afb44e38703df6ff67f77b6_7?geometry=-118.502%2C34.123%2C-118.467%2C34.135, accessed August 25, 2020.

¹¹⁶ KPFF Consulting Engineers, Mirman School for Gifted Children Water Resources Technical Report, July 2021, included as Appendix 12 of this MND.

¹¹⁷ Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G.

¹¹⁸ Safety Element of the Los Angeles City General Plan, November 26, 1996, Exhibit G.

included as Appendix 7.1 of this MND concludes that the potential for Project inundation by a seiche is “very low.”¹¹⁹

Based on the above, the Project would not result in a risk of release of pollutants due to inundation, and the impact would be less than significant.

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

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

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

According to the Water Resources Technical Report included as Appendix 12 of this MND, potential pollutants generated by the Project would be typical of school facility uses and may include sediment, nutrients, pesticides, trash and debris, oil and grease, and metals. These urban pollutants could be associated with increased vehicular activity in the existing parking lots, and increased use of maintenance and cleaning chemicals, herbicides and pesticides. However, the Project would implement BMPs consistent with the NPDES permit to reduce pollution in stormwater discharge to levels that comply with applicable water quality standards. In addition, in accordance with requirements of the City’s LID Ordinance, BMPs would be implemented throughout the operational life of the Project to ensure that stormwater pollution (in particular the pollutants that would be expected to be generated by the Project) is addressed. These BMPs, which would be required to capture, store and reuse an equivalent runoff volume produced from the greater of the 85th percentile storm event and the 0.75-inch storm event, could include the placement of filters in catch basins to capture debris, oil, and other pollutants, stenciling of on-site storm drain inlets, etc.). Also, new Project facilities would be very limited in size and scope (e.g., only 22,508 square feet of new floor area, and 0.3 acre of additional impervious surface), would generate a very limited amount of additional stormwater runoff (e.g. 0.19 cfs during the 50-year storm event), and would not include uses typically associated with polluted runoff (e.g., industrial facilities, oil refineries, landfills, etc.), such that Project operation would have a minimal potential to generate polluted runoff.

¹¹⁹ Geosyntec Consultants, Preliminary Geotechnical Investigation for Proposed Mirman School learning Center, January 20, 2021. Included as Appendix 7 of this MND.

Furthermore, with regards to the existing on-site transformer, physical and operational measures to protect against spills of toxic chemicals are in place and would be continued in accordance with all applicable hazardous materials regulations. Lastly, the City's stormwater discharges to the Ballona Watershed are required to comply with the TMDLs for the Watershed, and the City achieves this compliance through the application of regulatory BMPs and other requirements on individual development projects and the application of additional BMPs to the stormwater (such as filter screens at City outfalls), prior to discharge. As such, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant, and no mitigation measures are required.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a. Would the project physically divide an established community?

No Impact. The Project Site is located within the Brentwood–Pacific Palisades Community Plan Area of the City of Los Angeles. The Project Site is specifically located along Mulholland Drive, approximately 0.75 mile west of Interstate 405 (I-405). Land uses surrounding the Project Site include the Bel Air Presbyterian Church to the north across Mulholland Drive, an undeveloped hillside (part of a Prominent Ridge designated by the Mulholland Scenic Parkway Specific Plan) followed by the Berkeley Hall School to the south, undeveloped land to the east, and the Westland School and a large surface parking lot to the west. Beyond the Prominent Ridge, to the east, are the Milken Community High School and Curtis School. The nearest residential uses are single-family homes located along Corda Drive, approximately 800 feet west of the Project Site (across both the Westland School, surface parking lot, and an undeveloped field).

The Project proposes improvements to existing elementary and middle school buildings and new such uses. Specifically, the Project proposes a new two-story, 16,130-square-foot Learning Center building a 2,619 expansion to the second floor of the Library; a new 140-square-foot 8-foot-tall security pavilion and associated pedestrian entry gate; a new playground with a 15-foot-tall shade structure; replacement of the existing outdoor amphitheater in the Upper Campus with a student seating area and shade structure; a new 1,370-square-foot storage/trash/recycling enclosure; additional bicycle parking; and landscaping and open space improvements. However, the new and expanded buildings would be similar in scale, massing, and height to the existing school facilities (e.g., up to a maximum of two stories or 30 feet in height), with FAR increasing from 0.18 to 0.25. In addition, the new and expanded buildings and outdoor improvements would generally be located within the existing development footprint of the school (for example, the proposed Learning Center building would be developed within an existing school playfield,

the proposed expansion of the second floor of the Library would occur as part of an existing academic building, and the proposed storage/trash/recycling enclosure would be located largely within the existing parking lot area of the LLA) rather than on the undeveloped hillside portions of the campus. The proposed new and expanded buildings would be similar in scale, massing, and height to existing facilities. In addition, most Project construction activities and all Project operational activity would occur within the boundaries of the Project Site. No public roadways or sidewalks would be permanently closed or relocated, and no separation of uses or disruption of access between land use types would occur. Rather, implementation of the Project would result in continued use of the Project Site for educational purposes and would be consistent in terms of use and general character with the surrounding uses, including the multiple educational institutions in close proximity to the Project Site. Therefore, implementation of the Project would not physically divide an established community. No impact would occur, and no mitigation measures are required.

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

Less Than Significant Impact. Various local plans and regulatory documents guide development of the Project Site. The following discussion addresses the Project's consistency with the requirements and policies of the General Plan Framework Element, Brentwood-Pacific Palisades Community Plan, Mulholland Scenic Parkway Specific Plan, City of Los Angeles Municipal Code (Chapter 1—Planning and Zoning), and SCAG's 2020–2045 RTP/SCS. Under CEQA, the Project would be inconsistent with an applicable plan if it does not meet the general intent of the plan and/or would obstruct the attainment of the plan's primary goals. As discussed below, the Project would not be inconsistent with any of the applicable plans.

General Plan Framework Element

The City's General Plan Framework Element establishes the conceptual basis for the City's General Plan by setting forth a Citywide comprehensive long-range growth strategy and defining Citywide policies regarding land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, infrastructure and public services. The General Plan Framework Element land use policies are further guided at the community level through Community Plans and Specific Plans. As set forth in Table 10, the Project would be consistent with the applicable goals of the Land Use, Urban Form and Neighborhood Design, Open Space and Conservation, and Economic Development chapters of the General Plan Framework Element. The Framework Element's Transportation chapter policies are not included since they have been superseded by the City's Mobility Element, which is discussed under Checklist Question XVII.a, Transportation, of this MND. In addition, the Project's consistency with the Framework Element's Housing Chapter is not discussed since the Project would not replace, remove, or include any housing units.

Brentwood–Pacific Palisades Community Plan

The Project Site is located within an area designated as single-family residential by the Brentwood-Pacific Palisades Community Plan. The LAMC provides that educational uses within residential zones are not deemed inconsistent provided that a CUP is obtained. The school has operated at the Project Site since approximately 1971 under a series of CUP approvals, which would be consolidated and replaced by the CUP being currently sought.

Specific policies of the Brentwood-Pacific Palisades Community Plan apply to a range of land uses, including residential growth and development, maximum efficiency and accessibility of the commercial sector, and public and institutional land use. The Project's consistency with these policies is set forth below in Table 11.

Mulholland Scenic Parkway Specific Plan

With regard to Project consistency with the relevant development standards and design and preservation guidelines of the Mulholland Scenic Parkway Specific Plan, see Table 2 and 3. For example, as indicated therein, the Project Site is located within the Mulholland Scenic Parkway Specific Plan's Institutional Corridor and has therefore been designated by the City as an appropriate location for an educational institution. As further indicated therein, if the Project's requested entitlements are approved and conditioned by the decision-maker, and as mitigated herein, the Project would be consistent with the Mulholland Scenic Parkway Specific Plan.

City of Los Angeles Municipal Code

The Project requests several entitlement actions pursuant to Los Angeles Municipal Code (LAMC), Chapter 1 (Planning and Zoning Code). The LAMC defines the range of zoning classifications throughout the City, including the RE40-1-H (Residential Estate, Height District No. 1, Hillside Area) zoning applicable to the Project Site. Within the RE40 zone, single-family residences are permitted, as well as educational institutions pursuant to the City Planning Commission's approval of a conditional use permit (CUP) pursuant to LAMC Section 12.24 U.6.

The school currently operates pursuant to a CUP granted in 2012 (Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A) that serves as the governing entitlement for the Project Site, as its conditions of approval supersede those imposed in conjunction with prior CUP approvals granted by the City. In conformance with the conditions of Case No. CPC-2010-3300-CU-ZAA-DRB-SPP-1A, the school has timely filed an

Table 10
Project Consistency with Relevant Policies of the General Plan Framework Element

Goal, Objective, or Policy	Consistency Evaluation
Land Use Chapter	
Goal 3A: A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.	Consistent. The Project would expand the existing educational facilities of Mirman School while increasing student enrollment from 330 K–8 students to 430 K–8 students, thereby enhancing the educational environment for the school's students and staff while expanding the opportunity for students to join the school's community. Construction of the school's new improvements would occur largely within the Project Site's existing development footprint, and upon completion, the majority of the Project Site would continue to be landscaping and open space. The Project would not intrude upon or alter nearby existing residential neighborhoods, and both traffic and public services impacts would be reduced to less than significant levels by the mitigation measures identified in this MND. As such, the Project would contribute to the livability of the City.
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	Consistent. The Project would improve and expand the school's existing educational spaces by improving the existing library building, constructing a new Learning Center with additional classroom space, providing a new student playground and outdoor eating area, and providing additional school support facilities (i.e., storage/trash/recycling enclosure, security pavilion, etc.). These improvements would directly serve the needs of the school's students and staff and contribute to the school's viability, which would help serve the City's educational needs.
Policy 3.1.1: Identify areas on the Land Use Diagram and the Community Plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	Consistent. The Project would result in the expansion and improvement of an existing educational institution that has operated at the Project Site for over forty years, in close proximity to multiple other educational institutions that collectively serve the educational needs of many City students and families. Because the Project would enhance the school's existing facilities and expand its enrollment, it would support the continued viability of the school and its ability to continue to serve these educational needs.
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.	Consistent. While the Framework identifies the Project Site as being subject to a residential land use designation, the school has existed as a conditionally permitted educational institution for over 40 years, as permitted by the LAMC and the Mulholland Scenic Parkway Specific Plan, and much like the multiple other educational institutions located in close proximity to the Project Site. Moreover, as the proposed Project improvements are in keeping with the existing character of the school's campus as discussed in Checklist Section I, Aesthetics, of this MND, would be constructed largely within the school's existing development footprint, and would not encroach upon or impact existing single-family residential neighborhoods, the Project would be considered compatible with the Framework's Long-Range Land Use

Table 10 (Continued)
Project Consistency with Relevant Policies of the General Plan Framework Element

Goal, Objective, or Policy	Consistency Evaluation
	Diagram.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	Consistent. Because the Project would involve the expansion of an existing educational institution and an increase of 100 students and 30 staff, it would result in an increase in trips to and from the Project Site but would not meaningfully change the distribution of development in the City or induce new travel to a previously undeveloped site. Therefore, the Project would not impede or inhibit attainment of this objective. In addition, as described in this MND, the Project would not result in significant impacts pertaining to air pollution as indicated in Checklist Section III, Air Quality, of this MND, and would result in less than significant traffic/vehicle miles traveled impacts after mitigation as indicated in Checklist Section XVII, Transportation, of this MND.
Objective 3.2.4: Provide for the siting and design of new development that maintains the prevailing scale and character of the City's stable residential neighborhoods and enhance the character of commercial and industrial districts.	Consistent. Because the Project would involve improvements and new construction located predominantly within the existing development footprint of the Project Site, the visual impacts of the Project would be less than significant with mitigation, as indicated in Checklist Section I, Aesthetics, of this MND. Moreover, the Project's new construction has been designed to be architecturally consistent and compatible with the existing school buildings. Furthermore, as described below, the Project is consistent with the primary development standards and design guidelines of the Mulholland Scenic Parkway Specific Plan, including those standards regarding height and visibility. Therefore, the Project would not create incompatibility of scale or effects on the character of the surrounding residential community.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	Consistent. The Project would improve the educational facilities and expand the enrollment of an existing school that has helped serve the City's educational needs for over forty years while coexisting in proximity to other educational and institutional uses and established single-family neighborhoods. These campus improvements would help the school continue to promote a livable City for existing and future residents, while maintaining its existing scale and relationship to adjacent neighborhoods.
Objective 5.4: Encourage the development of community facilities and improvements that are based on need within the centers and reinforce or define those centers and the neighborhoods they serve.	Consistent. The Project would result in the creation of new and enhanced campus facilities as well as increased enrollment for the school, which would improve the school's ability to serve the educational needs of City residents.
Objective 5.5: Enhance the livability of all	Consistent. The Project's new building and related

Table 10 (Continued)
Project Consistency with Relevant Policies of the General Plan Framework Element

Goal, Objective, or Policy	Consistency Evaluation
neighborhoods by upgrading the quality of development and improving the quality of the public realm.	enhancements to the existing campus would occur largely within the school's existing development footprint and would be compatible with the scale and design of the existing improvements. Accordingly, the school would be able to provide expanded educational opportunities to existing and new students, while maintaining its compatibility with existing adjacent institutional uses and residential neighborhoods.
Objective 5.6: Conserve and reinforce the community character of neighborhoods and commercial districts not designated as growth areas.	Consistent. The Project would include construction of a new Learning Center and related campus improvements that would be constructed largely within the school's existing development footprint and be architecturally compatible with the existing campus, therefore conserving and reinforcing the existing relationship that the school has with its adjacent and proximate institutional uses and residential neighborhoods.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	Consistent. The Project would expand and enhance the school's existing campus largely on the flat terrace portion of the Project Site, without significantly encroaching into the steeper topography of the site, and without modifying the existing access patterns for the school.
Open Space and Conservation Chapter	
Objective 6.1: Protect the City's natural settings from the encroachment of urban development, allowing for the development, use, management, and maintenance of each component of the City's natural resources to contribute to the sustainability of the region.	Consistent. The Project Site is located in a designated hillside area and subject to the development and design controls of the Mulholland Scenic Parkway Specific Plan. As described throughout this MND, the Project's new buildings and improvements would be constructed largely within the school's existing development footprint and would be designed to achieve consistency with the school's existing buildings. Furthermore, the Project would substantially comply with the City's design and development standards, and as mitigated herein, would result in less than significant impacts to biological resources and no impacts to parklands or existing off-site open spaces.
Objective 6.3: Ensure that open space is managed to minimize environmental risks to the public.	Consistent. Following completion of the Project, approximately one-half of the Project Site would remain in landscaping and open space (47.9 percent). The Project would comply with all City and State erosion control and stormwater requirements during both construction and operation and would also comply with all fire-related protective measures due to the Project Site's location within a Very High Fire Hazard Severity Zone. As mitigated herein, no environmental risks would occur.
Policy 6.4.8.b: Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as	Consistent. Construction of the school's new improvements would occur largely within the Project Site's existing development footprint, and upon completion, would only disturb 1.45 acres of the Project Site and include only 22,508 net square feet of floor area. The Project would preserve approximately 47.9 percent of the Project site as private open spaces and would not impede any future improvement

Table 10 (Continued)
Project Consistency with Relevant Policies of the General Plan Framework Element

Goal, Objective, or Policy	Consistency Evaluation
neighborhood landscape and recreation amenities.	of off-site open spaces.
<i>Economic Development Chapter</i>	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	Consistent. The school currently helps meet the educational needs of the City's residents by offering a curriculum for gifted K–8 students; the proposed Project would expand the school's ability to meet these needs by increasing its enrollment and improving its existing campus facilities through development of a new Learning Center, expansion of the Library, and development and renovation of other campus buildings and facilities. The Project would also not result in any significant environmental impacts with implementation of the recommended mitigation. Lastly, the Project would: (1) incorporate the environmental sustainability features required by California Title 24, Los Angeles Green Building Code, CalGREEN and CAFE; (2) would implement the sustainability features required to achieve LEED Silver or equivalent certification; and (3) would implement a suite of other sustainability features, including but not limited to the retention of the existing EV and EVSE parking spaces, and the provision of bicycle parking, weather-based irrigation system, heat island reduction, optimized energy performance measures, rainwater capture and reuse, and recycling.
Policy 7.3: Maintain and enhance the existing businesses in the City.	Consistent. The school is an existing business in the City that has operated for over 50 years, and the breadth and viability of its educational mission would be expanded and enhanced through implementation of the Project.
Source: Eyestone Environmental, August 2021.	

Table 11
Project Consistency with Relevant Policies of the Brentwood–Pacific Palisades Community Plan

Goal, Objective, or Policy	Consistency Evaluation
Objective 1-3: To preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	Consistent. The Project proposes new development and improvements to the existing school campus, which would largely occur within the school's existing development footprint and not result in any significant changes to the school's existing proportions of open, undeveloped space. Moreover, the Project has been designed to be consistent with the school's existing architecture and would not be highly visible from either Mulholland Drive or nearby residential communities. Lastly, the Project would be consistent with the existing Community Plan land use designation and zoning of the Project Site, and with the Mulholland Scenic Parkway Specific Plan which identifies the Institutional Corridor in which the Project Site is located as an appropriate location for educational institutional uses. Therefore, the Project would preserve and enhance the residential character and integrity of existing neighborhoods.
Policy 1-3.1: Seek a higher degree of architectural compatibility and landscaping for new development to protect the character and scale of existing residential neighborhoods.	Consistent. The Project would comply with the design standards and guidelines of the Mulholland Scenic Parkway Specific Plan and would be consistent with the school's existing architecture. Specifically, the Project's new construction and improvements to existing buildings would comply with applicable height limits, would result in a minimal increase in floor area, and would not result in any significant expansion of the school's existing development footprint. The Project would therefore protect the character and scale of existing residential neighborhoods.
Policy 1-3.2: Preserve existing views in hillside areas.	Consistent. View impacts are described in greater detail in Checklist Section I, Aesthetics, of this MND. As described therein, the Project has been designed to comply with applicable height limits and would result in new construction and improvements to existing school buildings largely within the flat, terrace area of the campus, largely towards the rear of the Project Site and obscured from public view from Mulholland Drive. Moreover, the Project would not significantly encroach into the existing viewshed and would not obscure views of the nearby Prominent Ridge to the south and east of the Project Site as discussed in Checklist Section I, Aesthetics, of this MND. Therefore, as mitigated herein, existing views would be preserved.
Policy 1.6-2: Ensure the availability of adequate sewers, drainage facilities, fire protection services and other public utilities to support development within hillside areas.	Consistent. As described in greater detail in Checklist Sections X, XV, and XIX, Hydrology and Water Quality, Public Services, and Utilities, respectively, of this MND, the Project Site is served by adequate sewer and stormwater infrastructure that can accommodate increased wastewater and drainage flows resulting from the Project as discussed in Checklist Section XIX, Utilities and Service Systems, of this MND. In addition, existing fire protection services are adequate to continue to serve the existing school following development of the Project, and the Project would comply with all applicable regulations and mitigations (see Checklist

Table 11 (Continued)
Project Consistency with Relevant Policies of the Brentwood–Pacific Palisades Community Plan

Goal, Objective, or Policy	Consistency Evaluation
	Section XX, Wildfire, of this MND) regarding fire protection and fire resistive construction due to its location within a Very High Fire Hazard Severity Zone. Furthermore, other public utilities including water, gas, and electricity supply and infrastructure are sufficient to meet increased demand associated with the Project as discussed in Checklist Section XX.
Policy 1.6-3: Consider the steepness of the topography and the suitability of the geology in any proposal for development within the Plan area.	Consistent. As described in Checklist Section VII, Geology and Soils, of this MND, and as confirmed by LADBS (see Soils and Geology Approval Letter dated June 15, 2021 in Appendix 7.3), the Project Site's geological and topographical characteristics are suitable for development of the Project, and no impacts relating to fault rupture, landsliding, subsidence, or related geotechnical issues are anticipated as mitigated herein and in compliance with the conditions of the LADBS Soils and Geology Approval Letter. Furthermore, the Project would be developed largely within the existing school's development footprint upon the flat terraced portion of the Project Site and would, therefore, avoid significant changes to the hillside topography to the east and south of the Project Site.
Policy 1.6-5: Require that any proposed development be designed to enhance and be compatible with adjacent development.	Consistent. As described in Checklist Section I, Aesthetics, of this MND, the Project would be compatible with the school's existing architecture and scale and would comply with the design standards and guidelines of the Mulholland Scenic Parkway Specific Plan, with compliance with the mitigations herein, ensuring its compatibility with adjacent development.
Policy 1-6.6: The scenic value of natural land forms should be preserved, enhanced and restored. Wherever feasible, development should be integrated with and be visually subordinate to natural features and terrain. Structures should be located to minimize intrusion into scenic open spaces by being clustered near other natural and manmade features such as tree masses, rock outcrops and existing structures.	Consistent. As described in Checklist Section I, Aesthetics, of this MND, the Project would not result in significant impacts to existing scenic vistas, scenic resources, or the existing visual character of the Project Site or the surrounding area with implementation of the mitigation measures identified in Checklist Section I, Aesthetics, of this MND. The Project's new construction and improvements to existing structures would occur largely within the school's existing development footprint and would not result in a significant reduction in the amount of undeveloped open space currently existing. The new and improved buildings would observe applicable height limits and would be largely obscured by the school's existing buildings, resulting in very limited visibility of the new improvements from public vantage points.
Policy 4-1.1: Natural resources should be conserved on privately-owned land of open space quality and preserved on state parkland. City parks should be further developed as appropriate.	Consistent. As described under Checklist Section IV, Biological Resources, of this MND, and as mitigated herein, the Project would not significantly impact or disturb any significant natural resources on the Project Site. Moreover, the development of the Project would result in only an incremental increase in developed impervious surfaces; approximately 47.9 percent of the Project Site would remain

Table 11 (Continued)
Project Consistency with Relevant Policies of the Brentwood–Pacific Palisades Community Plan

Goal, Objective, or Policy	Consistency Evaluation
	in an pervious landscaping and open space.
Goal 6: Appropriate locations and adequate facilities for schools to serve the needs of existing and future population.	Consistent. The school has been in existence since approximately 1971, and currently serves 330 K–8 academically gifted students, thereby meeting a unique educational need in the City. The Project would result in enhanced facilities for the school as well as an increase in enrollment to 430 K–8 students, thereby allowing the school to expand its ability to serve this need. Furthermore, the Project would be consistent with the existing Community Plan land use designation and zoning of the Project Site, and with the Mulholland Scenic Parkway Specific Plan which identifies the Institutional Corridor in which the Project Site is located as an appropriate location for educational institutional uses. Accordingly, the Project's location is appropriate and would allow the school to meet the academic needs of the City's existing and future population.
Objective 6-1: To site schools in locations complementary to existing land uses and community character.	Consistent. The school has been in existence since approximately 1971 and is located within the Institutional Corridor as designated by the Mulholland Scenic Parkway Specific Plan, which is currently occupied by multiple educational institutions, including Berkeley Hall School and the Westland School, as well as residential uses, in immediate proximity to the Project Site, and the Curtis School and Milken School further east. By developing the proposed improvements within the existing Project Site and largely within the school's existing development footprint, the Project's location is appropriate and would remain complementary to existing land uses and community character.
Policy 6-1.1: Encourage compatibility in school locations, site layout and architectural design with adjacent land uses and community character.	Consistent. As noted above, the Project Site is located within the Mulholland Scenic Parkway Specific Plan's Institutional Corridor and has, therefore, been designated by the City as an appropriate location for an educational institution that would be compatible with adjacent community uses. Furthermore, the Project's improvements would substantially comply with the Specific Plan's design standards and guidelines, further ensuring compatibility with nearby uses. Lastly, the Project Site is already developed with a school which is already a part of the existing residential and institutional community character of the area.
Objective 8-2: To increase the community's and the Police Department's ability to minimize crime and provide adequate security.	Consistent. As described in Checklist Section XV, Public Services, of this MND, the Project would not result in significant impacts pertaining to police services. Moreover, one component of the Project is a new security pavilion at the school's entrance, which would help ensure the safety and security of the school's students and staff.
Policy 11-1.1: Encourage public schools, private schools and non-residential development to provide employee incentives for utilizing	Consistent. In connection with the Project, new short- and long-term bicycle spaces would be provided as required by the LAMC. In addition, the school encourages staff and

Table 11 (Continued)
Project Consistency with Relevant Policies of the Brentwood–Pacific Palisades Community Plan

Goal, Objective, or Policy	Consistency Evaluation
alternatives to the automobile (i.e., car pools, vanpools, buses, flex time, telecommuting, bicycles and walking, etc.).	student carpooling, and would continue to work with nearby residential homeowner associations and Council District 11 regarding potential traffic management strategies.
Objective 13-1: Comply with Citywide performance standards for acceptable levels of service and insure that necessary road access and street improvements are provided to accommodate traffic generated by all new development.	Consistent. As described in Checklist Section XVII, Transportation, of this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in significant impacts regarding vehicle miles traveled (VMT) or the City's prior level of service (LOS) threshold, nor would the Project result in any access issues. The Project Site's existing vehicular ingress and egress would be maintained and is adequate to accommodate the Project's increased enrollment with implementation of the mitigation identified in Checklist Section XVII.
Policy 13-1.2: New development projects shall be designed to minimize disturbance to existing traffic flow with proper ingress and egress to parking.	Consistent. As described above and in Checklist Section XVII, Transportation, of this MND, and as mitigated herein, the Project would not result in significant traffic- or access-related impacts during construction or operation, and existing ingress and egress to parking at the Project Site would be maintained.
Policy 13-1.3: Discourage non-residential traffic flow for streets designed to serve residential areas only by the use of traffic control measures.	Consistent. The Project would not result in any changes to existing streets, including to the existing school driveways off of Mulholland Drive, and existing access patterns would remain.
Policy 13-1.5: New development projects shall provide mitigation for project traffic impacts and density increases shall be contingent upon adequate transportation system capacity.	Consistent. As described in Checklist Section XVII, Transportation, of this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in significant impacts regarding vehicle miles traveled (VMT) or the City's prior level of service (LOS) threshold, nor would the Project result in any access issues.
Objective 15-1: To provide parking in appropriate locations in accord with Citywide standards and community needs.	Consistent. The Project would result in an increase in LAMC-required vehicle parking of 10 spaces (e.g., from 34 to 44 spaces) due to the addition of new classrooms and administrative space. However, these additional LAMC-required parking spaces would be accommodated by the school's existing 46 vehicle parking spaces, and therefore the Project would comply with all applicable City parking requirements as well as community needs.
Objective 16-1: To initiate neighborhood- based traffic and parking mitigation plans in each of the Community Plan's neighborhoods.	Consistent. The parking required for the school following completion of the Project would be fully contained within the Project Site. Furthermore, as described in Checklist Section XVII, Transportation, of this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in significant impacts regarding vehicle miles traveled (VMT) or the City's prior level of service (LOS) threshold, nor would the Project result in any access issues. Nevertheless, the school encourages staff

Table 11 (Continued)
Project Consistency with Relevant Policies of the Brentwood–Pacific Palisades Community Plan

Goal, Objective, or Policy	Consistency Evaluation
	and student carpooling, and would continue to work with nearby residential homeowner associations and Council District 11 regarding potential traffic management strategies.
Chapter V. Urban Design	
The design of all buildings shall be of a quality and character that improves community appearance by avoiding excessive variety and monotonous repetition. Achievement of this can be accomplished through: • Requiring the use of articulations recesses surface perforations and porticoes to break up long flat building facades. • Utilizing of complementary building materials in building facades. • Incorporating varying design to provide definitions for each floor. • Integrating building fixtures, awnings, security gates, etc. into design of building. • Screening all rooftop equipment and building appurtenances from adjacent properties. • Requiring decorative, masonry walls to enclose trash.	Consistent. The Project would be consistent with these urban design policies in that the new proposed Learning Center, the improvements to the existing library building, and other Project improvements would be constructed with complementary architecture and design features so as to integrate into the existing school campus. Specifically, the character of the new and expanded buildings would be contemporary but inspired by the tradition of simple utilitarian ranch buildings in the Santa Monica Mountains, while the muted material palette of the upper story of the proposed Learning Center and second story Library expansion have been chosen to best blend with the indigenous hillside landscape. The design also includes materials and details, such as porcelain tile siding and exposed fire-treated wood framing that serve to connect the Learning Center to the existing campus buildings. All rooftop equipment would be screened. Furthermore, the proposed storage/trash/recycling enclosure would be an enclosed structure.
<i>Source: Eyestone Environmental, August 2021.</i>	

application for a new CUP approval to allow the proposed Project and its associated increase in enrollment.

The Project Site is located within a designated Hillside Area, within which the City's single-family zone hillside area development standards set forth in LAMC Section 12.21 C.10 would normally apply. The Project would comply with those standards that are relevant to the Project Site, including the permissible "by-right" grading limits within the RE40 zone. However, the majority of the LAMC's hillside development standards, including maximum allowable height limits and required front and side yard setbacks, are superseded by the provisions of the Mulholland Scenic Parkway Specific Plan. The Project's consistency with the relevant development standards and design and preservation guidelines of the Mulholland Specific Plan is set forth in Section I, Aesthetics, of this MND. As conditioned therein, if the Project's requested entitlements are approved and conditioned by decision-maker, the Project would be consistent with these standards and guidelines.

Lastly, the Project would be consistent with the existing Community Plan land use designation and zoning of the Project Site, and with the Mulholland Scenic Parkway Specific Plan which identifies the Institutional Corridor in which the Project Site is located as an appropriate location for educational institutional uses.

Citywide Urban Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes ten guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. As evaluated under Checklist Question I.c of this MND, and as mitigated herein, the Project would be consistent with these guidelines.

SCAG Regional Transportation Plan/ Sustainable Communities Strategy

As described in Checklist Section VII, Greenhouse Gas Emissions, of this MND, SCAG's 2020–2045 RTP/SCS, adopted on September 3, 2020, presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The mission of the 2020–2045 RTP/SCS is to provide “leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians.” The 2020–2045 RTP/SCS places a greater emphasis on sustainability and integrated planning compared to previous versions of the RTP, and identifies mobility, accessibility, sustainability, and high quality of life, as the principles most critical to the future of the region. The goals and policies of the 2020–2045 RTP/SCS that focus on reducing VMT feature transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities such that there is access to high quality transit service.

Based on the analysis presented in Table 12, the Project would be consistent with applicable 2020–2045 RTP/SCS goals and principles.

Conclusion

As shown by the above, the Project is substantially consistent with applicable land use plans, policies, and regulations applicable to the Project Site, including those adopted for the purpose of avoiding or mitigating an environmental effect. No impacts would occur, and no mitigation is required.

Table 12
Comparison of Project with Applicable Goals and Principles of the 2020–2045 RTP/SCS

Goal	Consistency Evaluation
Goal 1: Encourage regional economic prosperity and global competitiveness	Consistent. The Project helps to encourage regional economic prosperity and global competitiveness by providing additional school facilities to serve, and providing additional employment opportunities within, the Mulholland Area and greater City of Los Angeles. Hence, the Project would be consistent with Goal 1.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	Consistent. As described in Checklist Section XVII, Transportation, of this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in any significant transportation-related impacts during construction or operation, including potential impacts related to VMT, LOS, access, or transit service, with implementation of the mitigation identified in Section XVII. The Project would not change existing access to and from the Project Site and would not result in significant vehicular or non-vehicular conflicts that could impair travel safety for people and goods in the vicinity of the Project Site or in the greater region with implementation of the mitigation identified in Section XVII. Moreover, by expanding an existing educational institution within its existing development footprint within an urban area, the Project would not result in demand for new or different transportation infrastructure to serve a newly established use. Therefore, the Project would be consistent with Goal 2.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	Consistent. As described in Checklist Section XVII, Transportation, of this MND and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in a significant number of new daily trips, would not result in significant VMT impacts, and would not result in significant LOS impacts. Accordingly, the Project would not adversely affect either the local or regional transportation system. Hence, the project would be consistent with Goal 3.
Goal 4: Increase person and goods movement and travel choices within the transportation system	Consistent. As described in Checklist Section XVII, Transportation, of this MND, and in the Transportation Assessment included as Appendix 14.1 of this MND, the Project would not result in significant impacts regarding VMT or LOS and would not create any access-related conflicts that could impair mobility or accessibility for people and goods in the vicinity of the Project Site or in the greater region. In addition, the school encourages staff and student carpooling, and would continue to work with nearby residential homeowner associations and Council District 11 regarding potential traffic management strategies.
Goal 5: Reduce greenhouse gas emissions and improve air quality. Goal 6: Support healthy and equitable communities.	Consistent. Furthermore, the Project would be consistent with Goals 5, 6, and 7 by including additional short- and long-term bicycle parking spaces. As indicated in Checklist Section VII, Greenhouse Gas Emissions, of this MND, the Project would reduce per capita GHG emissions and improve

Table 12 (Continued)
Comparison of Project with Applicable Goals and Principles of the 2020–2045 RTP/SCS

Goal	Consistency Evaluation
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	air quality by: (1) developing school uses within an existing urban area, on a site zoned for school uses/containing existing school uses; (2) developing school uses that would serve the existing residential uses in both the Mulholland area and greater City; (3) reducing per capita VMT after mitigation; (4) retaining existing EV and EVSE parking, and providing increased bicycle parking; and (5) incorporating environmental sustainability features, including those required by California Title 24, Los Angeles Green Building Code, CalGREEN and CAFÉ, and those required to obtain LEED Silver or equivalent certification. These same factors would also support healthy and equitable communities and a regional development pattern and transportation. Therefore, the Project would be consistent with Goals 5, 6 and 7.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel. Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options	Not Applicable. The Project is a 22,508-square-foot school expansion. The Project is not a large transportation project and/or a large infill project that could take advantage of new transportation technologies (such as light rail), or a residential project. Hence, Goals 8 and 9 are not applicable to the project. Furthermore, the Project would be consistent with the existing zoning of the Project Site which permits school uses and would not conflict with or hinder the achievement of Goals 8 and 9.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	Consistent. As indicated in the Project Description at the beginning of this MND, the Project improvements would be developed largely within the existing development footprint of the Mirman School campus rather than in the undeveloped hillside portions of the Project Site. As indicated in Checklist Section II, Agricultural and Forestry Resources, the Project would not be developed on agricultural land. As indicated in Section IV, Biological Resources, the Project would not be developed in wetlands, riparian area, or other protected habitats, and would result in less than significant impacts to biological resources after mitigation. Therefore, the Project would promote conservation of natural and agricultural lands and restoration of habitats and would be consistent with Goal 10.
Source: Eyestone Environmental, August 2021.	

XII. MINERAL RESOURCES

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

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

No Impact. No mineral extraction operations currently occur on the Project Site—the Project Site has been developed with educational uses for decades. Furthermore, the Project Site is not located within a City-designated Mineral Resource Zone where significant mineral deposits are known to be present, or within a mineral producing area as classified by the California Geological Survey (CGS).^{120,121} The Project Site is also not located within a City-designated oil field or oil drilling area.¹²² Therefore, the Project would not result in the loss of availability of a mineral resource. No impacts to mineral resources would occur, and no mitigation measures are required.

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

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

¹²⁰ City of Los Angeles Department of City Planning, Los Angeles Citywide General Plan Framework, Draft Environmental Impact Report, Figure GS-1, Areas Containing Significant Mineral Deposits in the City of Los Angeles, January 19, 1995.

¹²¹ State of California Department of Conservation, California Geologic Survey, Map of California Principal Mineral-Producing Localities 1990–2000.

¹²² Los Angeles General Plan Safety Element, November 1996, Exhibit E, Oil Field & Oil Drilling Areas, p. 55.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The analysis below is based, in part, on the noise calculation worksheets for the Project included as Appendix 13 of this MND.

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

Less Than Significant Impact With Mitigation incorporated.

Applicable Noise Regulations

Chapter XI, *Noise Regulation* (hereafter referred to as the Noise Regulations), of the LAMC, establishes acceptable ambient sound levels to regulate intrusive noises (e.g., stationary mechanical equipment, amplified sound, and vehicles other than those traveling on public streets) within specific land use zones. In accordance with the Noise Regulations, a noise level increase from certain regulated noise sources (e.g., mechanical equipment) of 5 dBA over the existing ambient noise level at an adjacent property line is considered a violation of the Noise Regulations. To account for people's increased tolerance for short-duration noise events, the Noise Regulations provides a 5-dBA allowance (for a total of 10 dBA¹²³ above the existing ambient noise level) for noise sources occurring for more than 5 but less than 15 minutes in any 1-hour period, and an additional 5-dBA allowance (for a total of

¹²³ A-weighted decibels, abbreviated dBA, are an expression of the relative loudness of sounds in air as perceived by the human ear. All sound levels measured in decibel (dB or dBA), as identified in the noise calculation worksheets included in Appendix 13 to this Initial Noise Study, are relative to 2×10^{-5} N/m².

15 dBA above the existing ambient noise level) for noise sources occurring for five minutes or less in any 1-hour period.¹²⁴

Ambient noise is defined by the Noise Regulations as the measured noise level averaged over a period of at least 15 minutes (i.e., L_{eq}).¹²⁵ For purposes of determining whether or not a violation of the Noise Regulations is occurring, the sound level measurements of the additional noise source are averaged over a minimum 15-minute duration and compared with the baseline ambient noise levels (i.e., without the additional noise source). The ambient noise baseline to be used is either the actual measured ambient noise level or the City's presumed ambient noise level, whichever is greater. In cases in which the actual measured ambient noise level is unknown, the City's presumed ambient noise level is used as the baseline. The City's presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels for residential zones are 50 dBA and 40 dBA, respectively.¹²⁶

Noise due to construction is regulated under Section 41.40 of the LAMC, which prohibits construction noise with 500 feet of residential uses before 7:00 A.M. or after 9:00 P.M. Monday through Friday and before 8:00 A.M. or after 6:00 P.M. on Saturday or national holiday and at any time on Sunday.¹²⁷ In addition, the Noise Regulations (Section 112.05 of the LAMC) limits noise from construction equipment located within 500 feet of a residential zone to 75 dBA (between 7:00 A.M. and 10:00 P.M.), measured at a distance of 50 feet from the source, unless compliance with this limitation is technically infeasible.¹²⁸

Noise due to motor driven vehicles on private property (e.g., parking lot) is regulated under Section 114.02 of the LAMC. In accordance with Section 114.02, operation of motor driven upon any property within the City, which cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than 5 dBA is considered a noise violation.

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

In addition to the Noise Regulations, the Noise Element of the City of Los Angeles General Plan (General Plan) Exhibit I establishes CNEL guidelines for land use compatibility.¹²⁹ Per the Noise Element, noise levels between 70 and 75 dBA CNEL are considered "normally unacceptable" and noise levels at 75 dBA CNEL and greater are considered "clearly unacceptable" for residential uses. Noise levels between 55 and 70 dBA CNEL are considered "conditionally acceptable" and noise levels less

¹²⁴ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

¹²⁵ Equivalent Sound Level (L_{eq}) is a measurement of the acoustic energy content of noise averaged over a specified time period. Thus, the L_{eq} of a time-varying sound and that of a steady sound are the same if they deliver the same amount of energy to the receptor's ear during exposure.

¹²⁶ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.03.

¹²⁷ Los Angeles Municipal Code, Section 41.40.

¹²⁸ In accordance with the City of Los Angeles Noise Regulations (Los Angeles Municipal Code, Section 112.05), "technically infeasible" means that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

¹²⁹ Noise Element of the Los Angeles City General Plan, adopted February 3, 1999.

than 55 dBA CNEL are considered “normally acceptable” for single-family residential uses. For school uses, noise levels between 70 and 80 dBA CNEL are considered “normally unacceptable” and noise levels at 80 dBA CNEL and greater are considered “clearly unacceptable”. In addition, noise levels between 60 and 70 dBA CNEL are considered “conditionally acceptable” and noise levels less than 60 dBA CNEL are considered “normally acceptable” for school and religious uses,

Therefore, the significance criteria used in the construction noise analysis in this section of the MND is: (1) an increase in the ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use in accordance with the City’s Noise Regulations; and (2) a noise level of 75 dB(A) or greater at a distance of 50 feet from the noise source (i.e., construction equipment) in accordance with LAMC Section 112.05.

The significance criteria used in the noise analysis for on-site operations in this section of the MND is an increase in the ambient noise level of 5 dBA (hourly L_{eq}) at the noise-sensitive uses, in accordance with the City’s Noise Regulations. The Noise Regulations do not apply to off-site traffic (i.e., vehicles traveling on public roadways). Therefore, the significance criteria for the off-site noise source is an increase in the ambient noise level by 3 dBA in CNEL (if the noise levels fall within the “normally unacceptable” or “clearly unacceptable” category, as specified in the City’s Noise Element) or 5 dBA in CNEL (if the noise levels fall within the “conditionally acceptable” or “normally acceptable” category) at noise-sensitive uses. In addition, the significance for composite noise levels (on-site and off-site sources), which is an increase in the ambient noise level of 3 dBA or 5 dBA in CNEL (depending on the land use category) for the Project’s composite noise (both project-related on-site and off-site sources) at noise-sensitive uses.

Existing Noise Environment

Some land uses are considered more sensitive to intrusive noise than others based on the types of activities typically involved at the receptor location. Noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Based on a review of the land uses in the Project area, a total of five noise receptor locations were selected to represent noise sensitive uses surrounding the Project Site. The locations of the noise-sensitive receptors are identified in Figure 24 and described in Table 13. As indicated therein, the five noise-sensitive receptor locations include Berkeley Hall School located 50 feet south of the Project Site, residential use on Fond Drive located approximately 400 feet north of the Project Site, Bel Air Presbyterian Church and Pre-school located 150 feet northwest of the Project Site, Westland School located immediately west of the Project Site, and residential use on Corda Drive located 800 feet west of the Project Site.

Ambient noise measurements were taken at the five selected off-site locations on October 1, 2019. Two 15-minute measurements were conducted at each of the off-site receptor locations, one during the daytime hours between 10:00 A.M. and 12:00 P.M. and one between 4:00 P.M. and 6:00 P.M., during the school standard operating hours (7:00 A.M. and 6:00 P.M.). The ambient noise measurements were taken in accordance with the City’s standards, which require ambient noise to be measured over a period of at least 15 minutes.¹³⁰

¹³⁰ LAMC Section 111.01.

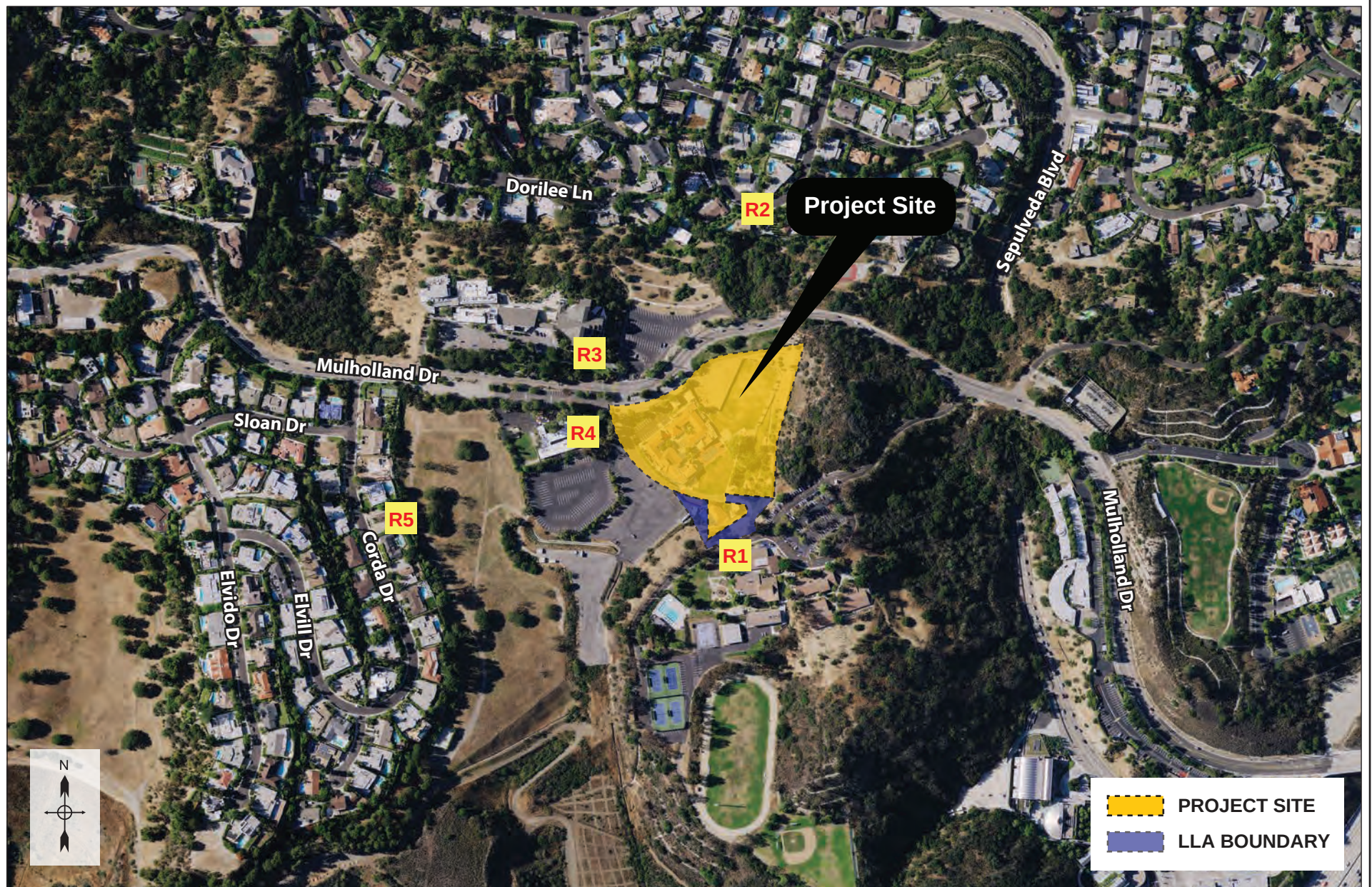


Table 13
Existing Ambient Noise Levels

Receptor Location	Noise Receptors Approximate Distance to Project Site/ Construction Area ^a	Measured Noise Levels, dBA L _{eq}		CNEL ^b (dBA)
		Morning Hours (10:00 A.M.–12:00 P.M.)	Afternoon Hours (4:00 P.M.–6:00 P.M.)	
R1 Berkeley Hall School, south of the Project Site	50 feet/205 feet	50.0	50.8	55.8
R2 Residential use on Fond Dr., north of the Project Site	400 feet/715 feet	49.9	52.8	57.1
R3 Bel Air Presbyterian Church and Pre-school, northwest of the Project Site	150 feet/270 feet	59.9	63.4	67.7
R4 Westland School, west of the Project Site	Adjacent to the Project Site/ 175 feet	50.9	49.6	55.2
R5 Residential use on Corda Dr., west of the Project Site	800 feet/900 feet	53.0	50.3	55.9
<i>CNEL = Community Noise Equivalent Level</i> <i>dBA = A-weighted sound pressure level in decibel</i> <i>L_{eq} = equivalent sound level</i> ^a Distances shown are estimated using Google Earth and are referenced to the nearest boundary of the Project Site. It should be noted that the Project construction areas located further inside the Project boundary, For example, R1 is approximately 50 feet from the Project Site, but approximately 205 feet from the nearest construction area. ^b Estimated based on short-term (15-minute) noise measurements per FTA procedures. Source: AES, May 2020.				

The results of the ambient sound measurement data are summarized in Table 13. As indicated in Table 13, the existing daytime ambient noise levels at the receptor locations range from 49.6 dBA L_{eq} (at receptor R4) to 63.4 dBA L_{eq} (at receptor R3). Based on field observation and measured sound data, the current ambient noise environment in the vicinity of the Project Site is controlled primarily by vehicular traffic on local roadways (i.e., Mulholland Drive) and other typical urban noise sources. The existing daytime ambient noise environment at receptor locations R3 and R5 currently exceed the City's presumed daytime ambient noise standard of 50 dBA (L_{eq}) for residential and school uses. Therefore, consistent with LAMC procedures, the measured existing ambient noise levels are used as the baseline conditions for the purposes of determining Project impacts.

Construction Noise

Construction noise impacts due to on-site construction activities associated with the Project were evaluated by calculating the construction-related noise levels at the sensitive receptor locations and comparing these estimated construction-related noise levels associated with construction of the Project to the City's noise limits for construction and the existing ambient noise levels (i.e., noise levels without construction noise from the Project). Construction noise associated with the Project was analyzed

based on the Project's potential construction equipment inventory, construction durations, and construction schedule. Project construction is anticipated to span 14 months (from mid-2022 through late 2023). The majority of construction activities would be for the new Learning Center, which would include demolition, grading/excavation, building foundation, building construction, and paving/landscape. Other Project improvements, such as, the new security pavilion, electrical service enclosure, renovation of the existing library building, and new playground, would involve less intensive construction activities (e.g., less grading). Project construction activities would comply with LAMC Section 41.40, which limit construction to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, 8:00 A.M. to 6:00 P.M. on Saturday, and no construction activities on Sunday or a national holiday.

On-Site Construction

Individual pieces of construction equipment that would be used for Project construction produce maximum noise levels of 74 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in Table 14. The construction equipment noise levels at 50 feet distance (Referenced Maximum Noise Levels) are based on the Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide (RCNM, 2006), which is a technical report containing actual measured noise data for construction equipment.¹³¹ These maximum noise levels would occur when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). However, equipment used on a typical construction site often operates under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage.¹³² These noise levels are typically associated with multiple pieces of equipment operating simultaneously. The construction noise levels at the sensitive receptor locations were calculated based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance. Additional noise attenuation was assigned to receptor locations where the line-of-sight to the Project Site was interrupted by the presence of intervening structures.

Table 15 provides the estimated construction noise levels for various construction phases at the off-site noise sensitive receptors. As indicated in Table 15, the estimated construction noise levels at all off-site noise sensitive receptors, with the exception of receptor location R2, would exceed the existing daytime ambient noise levels by more than 5 dBA. The construction noise would exceed the 5-dBA over the ambient significance criteria by 3.0 dBA at receptor location R3 to 17.1 dBA at receptor location R4. As such, construction noise impacts would be significant without mitigation measures. With implementation of Mitigation Measures NOI-1 and NOI-2, as described below, these construction noise impacts would be reduced to less than significant.

Regarding compliance of Project construction noise with LAMC Section 112.05 (i.e., a maximum construction noise level of 75 dBA at 50 feet from the noise source), based on the pieces of construction equipment likely to be used in Project construction as identified in the construction

¹³¹ Federal Highway Administration, FHWA Roadway Construction Noise Model User's Guide, January 2006.

¹³² Pursuant to the FHWA Roadway Construction Noise Model User's Guide, 2005, the usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

Table 14
Construction Equipment Noise Emission Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor (percent)	Reference Maximum Noise Levels at 50 Feet ^a L_{max} (dBA)
Air Compressor	40	78
Cement and Mortar Mixer	50	80
Compactor	20	83
Concrete Mixer Truck	40	79
Concrete Saw	20	90
Crane	16	81
Drill Rig	20	84
Forklift	10	75
Generator	50	81
Dump/Haul Truck	40	76
Excavator	40	81
Pump	50	81
Roller	20	80
Rubber Tired Loader	40	79
Tractor/Loader/Backhoe	40	80
Delivery Truck	40	74
Welders	40	74
<i>dBA = A-weighted sound pressure level in decibel</i> <i>L_{max} = maximum sound level</i> ^a <i>Construction equipment noise levels are based on FHWA RCNM.</i> <i>Source: FHWA Roadway Construction Noise Model User's Guide, Table 1, 2006.</i>		

assumptions included in Appendix 2 of this MND, and given the noise levels at 50 feet from these pieces of construction equipment as identified in Table 14, Project construction noise could reach up to 90 dBA at 50 feet from the noise source for short periods of time which would exceed the 75 dBA at 50 feet from the noise source threshold. However, with implementation of Mitigation Measure NOI-1, a reduction in this noise of 15+ dBA would occur at the existing nearby sensitive receptors which would represent a less than significant impact. This analysis is conservative because it does not account for the noise attenuation that would occur associated with the distance between the construction equipment and the existing nearby sensitive receptors.

Off-Site Construction Traffic

In addition to on-site construction noise, mobile noise from delivery/haul trucks and construction workers requiring access to the Project Site during the Project's construction phase would occur. Delivery and haul trucks would generally access the Project Site via Mulholland Drive, connecting to the regional freeway system (i.e., I-405 Freeway). Noise sensitive uses along the anticipated haul route (Mulholland Drive) include the Bel Air Presbyterian Church and Pre-school (receptor location R3) and the Milken Community Schools (Saperstein Middle School at 15900 Mulholland Drive and Upper

Table 15
Construction Noise Impacts

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Construction Noise Levels by Construction Phases ^b , dBA L _{eq}						Significance Threshold, ^a dBA (L _{eq})	Maximum Noise Exceedance Above the Criteria (L _{eq} (dBA))	Significant Impacts?
		Demo	Grading	Building Foundation	Building Construction	Entrance Pavilion	Finish/ Landscape			
R1	50.0	69.1	67.9	68.4	68.0	51.2	68.7	55.0	14.1	Yes
R2	49.9	48.6	47.0	47.8	47.4	44.8	48.5	54.9	—	No
R3	59.9	67.2	65.7	66.4	66.0	67.9	67.1	64.9	3.0	Yes
R4	49.6	71.7	70.4	71.0	70.6	71.3	71.5	54.6	17.1	Yes
R5	50.3	62.0	60.4	61.2	60.8	57.9	62.0	55.3	6.7	Yes
^a Significance thresholds are equivalent to the lowest measured daytime ambient noise levels (see Table 13) plus 5 dBA for construction activities lasting longer than 10 days in a three-month period. ^b Estimated noise levels include noise shielding provided by intervening buildings and/or land topography for receptors R1 and R2 Source: AES, July 2021.										

School Campus at 15800 Zeldins Way) located along the south side of Mulholland Drive. The peak period of construction traffic would be during the site grading/excavation phase, which would include up to 23 loaded haul trucks and 2 loaded delivery trucks per day (total of 25 incoming trips and 25 outgoing trips per day, or 50 daily truck trips). In addition, there would be approximately 20 worker trips per day during the site grading/excavation phase. The hourly truck trips were calculated based on an six-hour period (assuming hauling would occur between 9 A.M. and 3 P.M. so as to avoid peak hours) and a uniform distribution of trips, which would result in a maximum of eight truck trips (four arriving and four departing) per hour. Noise levels generated by construction-related traffic were calculated using the FHWA TNM version 2.5 noise model. As shown in the Noise Appendix (Appendix 13 of this MND), noise generated by construction trucks and worker vehicles along the roadways leading to the Project Site would be approximately 54.0 dBA (hourly L_{eq}) at the Bel-Air Presbyterian Church and Pre-school and 57.6 dBA (hourly L_{eq}) at the Milken Community Schools, which would be below the existing ambient noise level of 59.9 dBA (L_{eq}), as measured at receptor R3 (e.g., Bel Air Presbyterian Church and Pre-school) along Mulholland Drive. Therefore, the off-site construction traffic (trucks and worker vehicles) would not exceed the significance threshold of 5 dBA increase in ambient noise level. As such, off-site construction traffic noise impacts would be less than significant, and no mitigation measures are required.

Mitigation Measures

As analyzed above, on-site construction activities would have the potential to result in significant noise impacts at the off-site sensitive receptor locations. Therefore, the following mitigation measures are provided to reduce construction-related noise impacts:

Mitigation Measure NOI-1: Temporary noise barriers shall be used around the construction sites to block the line-of-sight between the construction equipment and the adjacent noise sensitive uses, as follows:

- Along the northern and western property lines of the Project Site, the temporary sound barriers shall be designed to provide a minimum 5-dBA noise reduction at receptor location R3 (maximum 6 foot high sound barrier), minimum 18-dBA noise reduction at receptor location R4 (minimum 20 foot high sound barrier), and minimum 7-dBA reduction at receptor location R5 (maximum 8 foot high sound barrier).
- Along the southern property line of the Project Site, the temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at receptor location R1 (maximum 16 foot high sound barrier).

Mitigation Measure NOI-2: Increased Noise Levels (Demolition, Grading, and Construction Activities)

- Demolition, grading, and construction activities are limited to the hours between 7:00 A.M. and 9:00 P.M. on weekdays and between 8:00 A.M. and 6:00 P.M. on Saturdays and national holidays, with no construction permitted on Sundays. Demolition and construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Operation Noise

Noise associated with the Project operation would include: (a) on-site stationary noise sources, including outdoor mechanical equipment (e.g., HVAC equipment) and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources.

On-Site Noise

Mechanical Equipment

The Project would include new air conditioning mechanical equipment (e.g., air ventilation equipment), which would be located at the new building roof level. Project-related outdoor mechanical equipment would be designed so as not to increase the existing ambient noise levels by 5 dBA in accordance with the City's Noise Regulations (Section 112.02 of the LAMC). Table 16 presents the estimated on-site mechanical equipment noise levels associated with this equipment at the off-site receptor locations. As shown on Table 16, the estimated noise levels from the mechanical equipment would range from 15.6 dBA (L_{eq}) at receptor location R2 to 42.3 dBA (L_{eq}) at receptor location R1, which would be well below the existing ambient noise levels. As such, the resulting ambient levels due to the mechanical equipment at all off-site receptor locations would be below the significance threshold of 5 dBA (L_{eq}) above existing ambient. Therefore, noise impacts from the Project mechanical equipment would be less than significant.

Outdoor Spaces

The Project would include new outdoor courtyards and terrace surrounding the Learning Center. Noise levels associated with the outdoor courtyards and terrace would include voices from the students and staff. A reference noise levels of 65 dBA for a male and 62 dBA for a female student speaking in a raised voice were used for analyzing potential noise impacts from the outdoor spaces.¹³³ In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. In addition, the hours of operation for use of the outdoor areas were assumed to be from 8:00 A.M. to 6:00 P.M. Table 17 presents the estimated noise levels at the off-site sensitive receptors, resulting from the use of outdoor areas. As presented in Table 17, the estimated noise levels from the outdoor spaces would range from 16.7 dBA (L_{eq}) at receptor location R2 to 43.4 dBA (L_{eq}) at receptor location R1, which would not result in an exceedance of the significance threshold of 5 dBA over the ambient noise levels. Therefore, noise impacts from the outdoor uses would be less than significant.

Parking

As presented in Section 3.0, Project Description, of this MND, the school currently provides 46 on-site parking spaces, which meets the 44-space parking requirement. Therefore, no additional parking spaces would be required or are proposed. Table 18 presents the estimated noise levels at the off-site sensitive receptors associated with the parking lot operation. As presented in Table 18, the estimated noise levels from the parking lot operation would range from 12.0 dBA (L_{eq}) at receptor location R2 to 38.9 dBA (L_{eq}) at receptor location R4, which would be well below existing ambient levels, and as a

¹³³ Cyril M. Harris, *Handbook of Acoustical Measurements and Noise Control*, Third Edition, 1991, Table 16.1.

Table 16
Mechanical Equipment Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Project Mechanical Equipment, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^a dBA (L _{eq})	Significant Impact?
R1	50.0	42.3	50.7	55.0	No
R2	49.9	15.6	49.9	54.9	No
R3	59.9	31.7	59.9	64.9	No
R4	49.6	31.7	49.7	54.6	No
R5	50.3	26.5	50.3	55.3	No
^a Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptor plus 5 dBA, per City's Noise Regulations. Source: AES, May 2020.					

Table 17
Outdoor Spaces Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L _{eq})	Estimated Noise from Outdoor Spaces, dBA (L _{eq})	Ambient + Project Noise Levels, dBA (L _{eq})	Significance Threshold, ^a dBA (L _{eq})	Significant Impact?
R1	50.0	43.4	50.9	55.0	No
R2	49.9	16.7	49.9	54.9	No
R3	59.9	31.1	59.9	64.9	No
R4	49.6	27.3	49.6	54.6	No
R5	50.3	25.8	50.3	55.3	No
^a Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptors plus 5 dBA, per City's Noise Regulations. Source: AES, May 2020.					

result, would not result in any exceedances of the 5 dBA significance threshold. Therefore, noise impacts from the parking operation would be less than significant.

Off-Site Traffic Noise

The Project is expected to generate a total of 91 net increase of trips during the morning peak hour, 62 net new trips during the school peak afternoon hour, and 26 net new trips during the afternoon commuter peak hour. Project-generated traffic noise impacts were evaluated by comparing the increase in noise levels from the "future without project" condition to the "future with project" condition, with the Project's significance threshold. The cumulative noise impacts due to off-site traffic were analyzed by

Table 18
Parking Lot Noise Levels

Receptor Location	Existing Ambient Noise Levels, dBA (L_{eq})	Estimated Noise from Parking Lot, dBA (L_{eq})	Ambient + Project Noise Levels, dBA (L_{eq})	Significance Threshold,^a dBA (L_{eq})	Significant Impact?
R1	50.0	21.4	50.0	55.0	No
R2	49.9	12.0	49.9	54.9	No
R3	59.9	34.5	59.9	64.9	No
R4	49.6	38.9	50.0	54.6	No
R5	50.3	20.6	50.3	55.3	No
^a Significance thresholds are equivalent to the lowest measured ambient noise levels at the receptors plus 5 dBA, per City's Noise Regulations. Source: AES, May 2020.					

comparing the projected increase in traffic noise levels from “existing” conditions to “future with project” conditions to the Project’s significance criteria. Traffic noise levels at the off-site noise sensitive receptors were calculated using FHWA’s Traffic Noise Model and the Project’s traffic volume data. The traffic noise impact analysis is based on the 24-hour CNEL noise descriptor.

Table 19 provides a summary of the off-site traffic noise analysis. As shown in Table 19, traffic from the Project would result in a maximum noise increase of 0.6 dBA at the Project Main Driveway (from Mulholland Drive into the Project Site), which is considered a negligible increase. In addition, the cumulative traffic volumes would result in a maximum increase of 0.8 dBA CNEL along the Project Main Driveway and 0.7 dBA CNEL along Mulholland Drive (between Skirball Center Drive and Casiano Road). The estimated noise increase along the Project Main Driveway would be well below the 5-dBA significance threshold (applicable to noise levels within the 60 to 70 CNEL (dBA) “conditionally acceptable” land use category for schools,). In addition, the estimated noise increases along Hayvenhurst Avenue would be below the 3-dBA significance threshold under both Project and Cumulative level (applicable to noise levels within the 70 to 75 CNEL (dBA) “normally unacceptable” land use category for residential uses). Therefore, off-site traffic noise impacts associated with the Project would be less than significant.

Composite Noise Levels

An evaluation of composite noise levels, including all Project related noise sources plus the existing ambient level, was conducted to identify the potential maximum Project-related noise level increase that may occur at the nearby noise-sensitive receptor locations. The overall sound environment at the areas surrounding the Project Site would include contributions from each on-site and off-site individual noise source associated with the typical daily operation of the Project. On-site noise sources associated with the Project would include mechanical equipment, outdoor uses, and parking lot. Table 20 presents the estimated noise from Project-related noise sources in terms of CNEL. As indicated in Table 20, the Project would result in a maximum increase of 0.1 dBA CNEL at receptors R2 and R3 to 0.6 dBA CNEL at receptor R4. The increases in noise levels due to the Project at all off-site receptors would be

Table 19
Off-Site Roadway Traffic Noise Impacts

Roadway Segment	Calculated Traffic Noise Levels, ^a CNEL (dBA)			Increase in Noise Levels, CNEL (dBA)		Significant Impact?	
	Existing Without Project (A)	Future Without Project (B)	Future With Project (C)	Project Level (C – B)	Cumulative (C – A)	Project Level	Cumulative
Hayvenhurst Avenue							
– Between Magnolia St. and Ventura Blvd.	72.1	72.4	72.4	0.0	0.3	No	No
– Between Ventura Blvd. and Libbi Ave.	70.8	71.3	71.3	0.0	0.5	No	No
Sepulveda Boulevard							
– Between Greenleaf St. and Valley Vista Blvd.	71.0	71.4	71.4	0.0	0.4	No	No
– Between Valley Vista Blvd. and Fiume Walk	72.0	72.3	72.3	0.0	0.3	No	No
– Between Fiume Walk and Sherman Oaks Ave.	72.3	72.7	72.7	0.0	0.4	No	No
– Between Skirball Center Dr. and Dartford Wy.	72.9	73.3	73.3	0.0	0.4	No	No
Main Driveway							
– From Mulholland Dr. into the Project Site	60.3	60.5	61.1	0.6	0.8	No	No
Mulholland Drive							
– Between Calneva Dr. and Main Driveway	71.6	72.0	72.1	0.1	0.5	No	No
– Between Main Driveway and Walt Disney Dr.	71.9	72.2	72.4	0.2	0.5	No	No
– Between Walt Disney Dr. and Skirball Center Dr.	71.6	72.0	72.1	0.1	0.5	No	No
– Between Skirball Center Dr. and Casiano Rd.	70.7	71.4	71.4	0.0	0.7	No	No
^a Noise levels are calculated at 10 feet from the edge of roadway. Detail calculation worksheets are included in Appendix 13 of this MND. Source: AES, July 2021.							

Table 20
Composite Noise Levels

Receptor Location	Calculated Project-Related Noise Levels, ^a CNEL (dBA)				Project Composite Noise Levels, CNEL (dBA)	Ambient Noise Levels, CNEL (dBA)	Ambient + Project Noise Levels, CNEL (dBA)	Increase in Noise Levels Due to Project, CNEL (dBA)
	Traffic	Mechanical	Outdoor Spaces	Parking Lot				
R1	41.5	41.8	40.4	18.7	46.1	55.3	55.8	0.5
R2	29.6	15.6	14.4	10.8	29.9	57.0	57.1	0.1
R3	50.0	31.2	28.1	31.6	50.1	67.6	67.7	0.1
R4	46.3	31.2	24.4	36.0	46.9	54.6	55.2	0.6
R5	42.7	26.1	22.9	18.0	42.8	55.6	55.9	0.3
^a Detail calculation worksheets are included in Appendix 13 of this MND. Source: AES, May 2020.								

well below the 5 dBA CNEL significance threshold. Therefore, the composite noise level impacts due to Project operation would be less than significant.

Conclusion

Based on the above, the Project would result in less than significant construction noise with mitigation incorporated and less than significant operational noise.

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

Less Than Significant Impact. Heavy construction equipment (e.g., a bulldozer and excavator) would generate a limited amount of ground-borne vibration at short distances away from the source. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in close proximity to the construction site; i.e., within 15 feet as related to building damage and 80 feet as related to human annoyance at residential uses.

Heavy construction equipment (e.g., large bulldozer) would generate vibration level up to 0.089 inch/second Peak Particle Velocity (PPV) at a distance of 50 feet from the equipment.¹³⁴ With respect to potential building damage, FTA provides potential building damage criteria varied from 0.12 PPV (inch/second) for buildings extremely susceptible to vibration to 0.50 PPV (inch/second) for reinforced-concrete, steel or timber buildings. The Project construction activities would be more than 50 feet from any off-site building structures. Therefore, vibration associated with project construction would be well below the most stringent significance threshold. As such, vibration impacts with respect to potential building damage would be less than significant.

¹³⁴ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 12-2.

With respect to potential vibration-related human annoyance associated with on-site construction activities, FTA provides ground-borne vibration impact criteria of 72 VdB and 75 VdB (vibration velocity level in decibel) for residential and institutional uses (such as school and religious uses). The two nearest off-site sensitive uses are the Westland School (receptor R4) and the Berkeley Hall School (receptor R1), which are approximately 175 and 205 feet from the nearest on-site construction site. Heavy construction equipment (e.g., large bulldozer) would generate vibration level up to 87 VdB at a distance of 50 feet from the equipment.¹³⁵ Based on distance attenuation, the vibration levels at Westland School and Berkeley Hall School associated with on-site construction activities are estimated to be up to 62 and 60 VdB, respectively. Vibration levels at further receptors (i.e., R2, R3 and R5) would be lower due to distance attenuation. The estimated vibration levels of 60–62 VdB due to construction equipment would be well below the FTA vibration criteria of 75 VdB applicable to institutional uses such as the Westland School and Berkeley Hall School.¹³⁶ As such, vibration impacts with respect to human annoyance associated with on-site construction activities would be less than significant.

Based on the above, vibration impacts associated with the Project would be less than significant, and no mitigation measures are required.

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

No Impact. The Project Site is not located within the vicinity of a private airstrip or an airport land use plan or within 2 miles of an airport. The closest airport to the Project Site, the Van Nuys Airport, is located approximately 4.6 miles from the Project Site. Given the distance between the Project Site and the Van Nuys Airport, the Project would not expose people working or residing in the Project area to excessive noise levels associated with airport operation.

XIV. POPULATION AND HOUSING

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

¹³⁵ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 12-2.

¹³⁶ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018, Table 8-1.

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

Less Than Significant Impact. The Project would not include the development of new residential units. As such, implementation of the Project would not generate a direct increase in the permanent population of the area or cumulatively exceed official regional or local population projections.

Given the scale of the Project (e.g., a net increase of 22,508 square feet of education- and facility-related floor area), construction of the Project would create a small number of temporary construction-related jobs. Furthermore, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, few if any Project-related construction workers would be expected to relocate their household's place of residence to the local area as a consequence of working on the Project

With regard to Project operation, Mirman School currently operates under a CUP that allows a maximum enrollment of 330 full-time K–8 students. The Project would increase this enrollment to 430 K–8 students (a net increase of 100 students) and would be expected to increase the on-site faculty and staff from 78 to 108 employees (a net increase of 30 employees). However, this would represent an infinitesimal increase in population when compared to the existing population of the Community Plan area and greater City of Los Angeles. Hence, the net increase in the resident and employee populations in the local area as a result of the Project would be expected to be both: (1) well within the existing population projections for the community and region and (2) able to be accommodated by vacancies in the existing housing stock and new residential units currently being developed in the region. Moreover, no extension of new roads to currently un-served areas would occur, and infrastructure would only be expanded to the extent that it is needed to serve the Project Site (e.g., no extension of utilities or infrastructure not already served by such). Thus, the Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). The impact would be less than significant, and no mitigation measures are required.

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

No Impact. As no housing currently exists on the Project Site, the Project would not displace any existing people or housing. No impact would occur, and no mitigation measures are required.

XV. PUBLIC SERVICES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	☐	☒	☐	☐
b. Police protection?	☐	☒	☐	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

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

Less Than Significant With Mitigation. Fire protection and emergency medical services are provided to the Project Site by the Los Angeles Fire Department (LAFD). The Project Site is located within Battalion 10, Division 3 of the LAFD.¹³⁷ The “first-in” LAFD fire station for the Project Site is the Encino Hills Fire Station No. 109, located at 16500 Mulholland Drive, approximately 0.5 mile west of the Project Site. The Project Site is also located within a Very High Fire Hazard Severity Zone, as defined in the City of Los Angeles Municipal Code.¹³⁸

During Project construction, short-term Project construction activities and the staging of construction equipment would primarily occur within the Project Site. Therefore, emergency access to the Project Site during construction would be maintained via Mulholland Drive. Project construction activities would also not impede access to other nearby uses, and Project construction traffic would be limited to a maximum of 46 truck trips (e.g., 23 loaded and 23 empty truck trips) and 55 construction worker vehicle trips per day during the most intensive construction phases.¹³⁹ Furthermore, in accordance with City requirements, the Project would be required to implement a Construction Traffic Management Plan (Mitigation Measure TR-7 in Checklist Section XVII, Transportation, of this MND) that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project vicinity during the construction period. With adherence to these requirements, Project construction activities would not result in a substantial risk of fires, including wildland fires, would not interfere with LAFD emergency access, and would not substantially affect LAFD response times.

¹³⁷ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹³⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹³⁹ The maximum number of truck trips and maximum number of construction worker vehicle trips would not occur during the same construction phase, so there would never be 40 truck trips + 55 construction worker vehicle trips in a single day.

All projects located within a Very High Fire Hazard Severity Zone must comply with the requirements set forth for the Mountain Fire Districts, as outlined in Section 57.25.01 of the LAMC. These requirements include the use of fire resistant plants and construction materials, the regular clearing of brush, and greenbelt standards. Furthermore, the Project would comply with applicable provisions of the City's Fire Code (Chapter V, Article 7 of the LAMC) and Building Code, including the installation of fire sprinklers, water line improvements, and connections in new buildings, as required, as well as the provision of sufficient emergency access and fire lane widths to ensure that fire suppression and access would be adequate to serve the Project. In addition, the Project has been designed to include fire-resistive design and construction features, including the new Learning Center being designed as Type IV Construction featuring fire-resistive Cross Laminated Timber (CLT) beams and columns, and incorporating fire-resistive exterior materials including porcelain ceramic tiles and an aluminum louver system with simulated wood appearance. Additional Project specific requirements, if necessary, would be determined by the LAFD during the building permit plan check process and have been mitigated herein per LAFD recommendations. With adherence to these mitigation measures and requirements, Project operation would not result in a substantial risk of fires, including wildland fires.

The Project would not include a residential component, and thus would not directly increase the demand for fire protection services and facilities from LAFD. The Project would increase school student enrollment from 330 to 430 students (a net increase of 100 students) and would increase school faculty and staff levels from 78 to approximately 108 employees (a net increase of 30 employees). However, based on the nature of school operations, the increase in the daytime population within the Project Site, and the likelihood that only a small fraction of the already small number of associated households would relocate to the service area of Fire Station No. 109, the Project would not substantially affect LAFD's capability to provide adequate fire protection services to the Project Site and to its service area. Furthermore, access to the Project Site is and would continue to be provided from Mulholland Drive, and the LAFD would conduct a review of Project plans prior to approval to ensure that adequate fire safety features are incorporated into the Project. Lastly, as indicated in Checklist Section XVII, Transportation, of this MND, with implementation of mitigation, the Project would result in less than significant traffic impacts. Therefore, existing fire service levels, emergency access and emergency response times in the Project area would not be substantially affected during Project operation.

Water for fire protection would be provided from existing fire hydrants. In addition, the Project would comply with applicable provisions of the City's Fire Code (Chapter V, Article 7 of the LAMC) and Building Code, including the installation of fire sprinklers, water line improvements, and connections in new buildings, as required, as well as the provision of sufficient emergency access and fire road widths to ensure that fire suppression and access would be adequate to serve the Project. Additional Project specific requirements, if required, would be determined by the LAFD during the building permit plan check process. Lastly, per the Information of Fire Flow Availability Request (IFFAR) included as an appendix in the Utilities Report, which is included as Appendix 16 of this MND, adequate fire hydrants and associated fire flow pressures exist adjacent to the Project Site to serve the Project.

Based on the above, the Project would not require new or physically altered LAFD facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. Hence, impacts with respect to fire protection would be less than significant as mitigated herein (see Checklist Section XX, Wildfires, of this MND).

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

Less Than Significant With Mitigation. Police protection services are provided to the Project Site and the surrounding area by the Los Angeles Police Department (LAPD). The Project Site is located in Reporting District 804 within the jurisdiction of the LAPD's West Bureau and is served by the West Los Angeles Community Police Station located at 1663 Butler Avenue, approximately 6.2 miles southeast of the Project Site.¹⁴⁰ This station has a service area encompassing 65.14 square miles with a population of over 228,000 people.¹⁴¹

Short-term Project construction activities and the staging of construction equipment would primarily occur within the Project Site. In addition, Project construction activities would not impede access to other nearby uses, and in accordance with City requirements, the Project would be required to implement a Construction Traffic Management Plan that would include specific measures to be implemented by the contractor to ensure safe and adequate access in the Project Site and adjacent properties. Project construction traffic would be limited to a maximum of 46 truck trips (e.g., 23 loaded and 23 empty truck trips) and 55 construction worker vehicle trips per day during the most intensive construction phases.¹⁴² Therefore, construction activities would not interfere with emergency police access or substantially affect police response times.

As indicated previously, the Project would result in a net increase of 100 students and approximately 30 employees at the Project Site, with only a small fraction of the associated households likely to move to the Project area. The Project would not result in the permanent closure of any local public streets, and access to the Project Site would continue to be provided from Mulholland Drive. Furthermore, as indicated in Checklist Section XVII, Transportation, of this MND, the Project would result in less than significant traffic impacts after mitigation. Lastly, new and renovated school facilities under the Project would include the continuation of existing security features (e.g., fenced/gated campus, security lighting, etc.), the construction of a new security pavilion, and implementation of any additional security features/measures required by the City. Therefore, existing police protection service levels, emergency access and emergency response times in the Project area would not be substantially affected during Project operation.

Based upon a letter received by LAPD dated January 7, 2020, "a project of this size could have a minor impact on police services in the West Los Angeles Community area." As such, mitigation measures are recommended by LAPD as listed below. With the implementation of these mitigation measures Project impacts on police protection services would be less than significant.

¹⁴⁰ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁴¹ Los Angeles Police Department, About West Los Angeles www.lapdonline.org/west_la_community_police_station/content_basic_view/1630, accessed January 2, 2019.

¹⁴² The maximum number of truck trips and maximum number of construction worker vehicle trips would not occur during the same construction phase, so there would never be 40 truck trips + 55 construction worker vehicle trips in a single day.

Mitigation Measure POLICE-1: Prior to Building Permit sign off, the school shall contact Community Outreach and Development Division, Crime Prevention Through Environmental Design Officer (CPTED), James Nichols at e-mail address: cpted@lapd.online. Any recommendations shall be incorporated into the project.

Mitigation Measure POLICE-2: Upon completion of the Project, provide the Commanding Officer of The West Los Angeles Community Police Station with a diagram copy of each portion of the property. The West Los Angeles Community Police Station's Commanding Officer is Captain Jonathan Torn. West Los Angeles is located at 1663 Butler Ave Los Angeles CA 90025 (RD 0853). (Phone: 310-444-0710). The diagram should include access routes and any additional information that might facilitate police response.

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

Less Than Significant Impact. The Project Site is located within the West Local District of the Los Angeles Unified School District (LAUSD). The Project would not result in the development of residential uses and, as such, would not directly generate new students in the LAUSD. Rather, the Project would be expected to continue to reduce the demand for public schools through the expansion of private school facilities within the community. Therefore, the Project would be expected to directly decrease rather than directly increase LAUSD service demand.

As indicated previously, the Project would result in a net increase of 100 students and approximately 30 employees at the Project Site, with only a small fraction of the associated households likely to move to the Project area. Therefore, the Project would not indirectly generate a substantial increase in LAUSD service demand. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to LAUSD prior to the issuance of building permits, and pursuant to Government Code Section 65995, the payment of these fees is considered full mitigation of Project-related school impacts.

Based on the above, the Project would not require new or physically altered LAUSD facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. The Project Site is located within the service area of the City of Los Angeles Department of Recreation and Parks (DRP). According to DRP, there is one City neighborhood park (e.g., Mulholland Site View No. 16) within a 2-mile radius (e.g., the service radius for neighborhood parks) of the Project Site, 11 community parks within a 5-mile radius (the service radius for community

parks), and 23 regional parks within a 10-mile radius (e.g., the service radius for regional parks) of the Project Site.¹⁴³ Also according to DRP, the existing Citywide parkland to population ratio is 0.84 acre of neighborhood or community parkland per 1,000 residents, with the City's General Plan setting a Citywide parkland to population ratio goal of 10 acres per 1,000 residents.¹⁴⁴ Lastly, according to DRP, while data regarding the level of use of the park and recreational facilities that serve the Project Site is not available, parks within the surrounding community are heavily utilized and overburdened, and yet DRP has no current plans for new or expanded City parks and recreational within a 2-mile radius of the Project Site.¹⁴⁵

The Project would not result in the development of residential uses. As such, the Project would not have an impact on existing City parks and recreational facilities according to DRP.¹⁴⁶ In addition, while the Project would result in a net increase of 100 students and approximately 30 employees at the Project Site, these additional students and employees would have access to existing and proposed outdoor open space and school amenities (e.g., play fields/courts, courtyards, the proposed new playground and student seating area, and pedestrian paths). Thus, no new direct demand for DRP parks and recreational facilities would be generated by the Project.

With regard to indirect impacts, any indirect demand for DRP parks and recreational facilities associated with the Project would be expected to be small. This is because of the small number of new students and employees involved, and the even smaller proportion of the associated households that would likely move to the Project area as a result of the Project.

Based on the above, the Project would not require new or physically altered DRP facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts on parks would be less than significant, and no mitigation measures would be necessary.

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

Less Than Significant Impact. Other governmental services that could potentially be impacted include roads and libraries. The Project does not propose the permanent closure of any local public streets, and access to the Project Site would continue to be provided from Mulholland Drive. In addition, as discussed in Checklist Section XVII, Transportation, of this MND: (1) the Project would generate a net increase of 234 daily motor vehicle trips; (2) the additional traffic that would be generated by the Project would result in less than significant impacts in terms of VMT; and (3) the Project would not result in substantial traffic

¹⁴³ City of Los Angeles Department of Recreation and Parks, written correspondence dated July 23, 2020, from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch.

¹⁴⁴ City of Los Angeles Department of Recreation and Parks, written correspondence dated July 23, 2020, from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch.

¹⁴⁵ City of Los Angeles Department of Recreation and Parks, written correspondence dated July 23, 2020, from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch.

¹⁴⁶ City of Los Angeles Department of Recreation and Parks, written correspondence dated July 23, 2020, from Darryl Ford, Acting Superintendent, Planning, Maintenance, and Construction Branch.

congestion (e.g., would not exceed applicable traffic level of service requirements). Therefore, the impact on roads would be less than significant.

Library services within the Project area are provided by the City of Los Angeles Public Library (LAPL). The closest LAPL library to the Project Site is the Sherman Oaks Library located at 14245 Moorpark Street in Sherman Oaks, approximately 4.60 miles northeast of the Project Site. The Project does not propose residential uses, and, therefore, there would be no direct increase in demand for LAPL services associated with the Project. Furthermore, Mirman School currently has a library that is available to students and staff, and both interior renovations and a library expansion are proposed as part of the Project, such that the Project would be expected to adequately meet the needs of the 100-student increase in school enrollment associated with the Project. Lastly, while the households associated with the net increase in students and employees resulting from the Project could potentially generate some demand for LAPL services, for the same reasons discussed previously for parks, any such indirect demand would be expected to be minimal.

Based on the above, the Project would not require new or physically altered roads or LAPL facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives. Impacts on roads and library facilities would be less than significant, and no mitigation measures are required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

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

Less Than Significant Impact. As discussed under Checklist Question XV.d above, the Project would not result in the development of residential uses. As such, no new residential population that would result in a direct increase in the demand for DRP parks and recreational facilities would be generated. In addition, while enrollment would increase at Mirman School from 330 to 430 students, the additional students generated by the Project would have access to the existing and proposed outdoor open space and school amenities at the Project Site (see discussion under Checklist Question XV.d above for listing). Thus, there would be no direct increase in demand for DRP parks and recreational facilities associated with the Project.

As noted under Checklist Question XV.d above, the Project could potentially generate some indirect demand for DRP parks and recreational facilities. However, for the same reasons discussed under Checklist Question XV.d (e.g., there would not be a substantial number of new households moving to the area as a result of the Project), this indirect demand would not be substantial.

Based on the above, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. The impact would be less than significant, and no mitigation measures are required.

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

No Impact. The Project would develop a new playground with shade structure, a new student seating area with shade structure, courtyard, faculty/lounge, landscape areas, and pedestrian connections between these amenities and existing recreational facilities at the school (e.g., the playfields, ball courts, etc.). These improvements would occur within the existing development footprint of the campus. Furthermore, the environmental effects associated with the construction of these improvements are subsumed in the impact analysis for the Project in the other Checklist responses in this MND, and no additional adverse effects on the environment associated with their construction would occur. Therefore, the Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact would occur, and no mitigation measures are required.

XVII. TRANSPORTATION

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

The following analysis is based, in part, on the Transportation Assessment for the Mirman School For Gifted Children (Transportation Assessment) prepared by Gibson Transportation Consulting Inc. dated July 2020 and included as Appendix 14.1 of this MND. The Transportation Assessment was prepared in accordance with the assumptions, methodologies, and procedures outlined in the City of Los Angeles Department of Transportation (LADOT) Transportation Assessment Guidelines (July 2019) and was approved by LADOT in their Transportation Impact Assessment Approval Letter dated August 14, 2020,

included as Appendix 14.2 of this MND. The scope of, and analysis included in, the Transportation Assessment was developed in consultation with LADOT as set forth in a Memorandum of Understanding included as Appendix A of the Transportation Assessment. The analysis is also based, in part, on the following: (1) a Related Projects Technical Memorandum prepared by Gibson Transportation Consulting Inc. dated July 26, 2021, included as Appendix 14.3 of this MND;¹⁴⁷ and (2) an LADOT Revised Transportation Assessment Approval Letter prepared by LADOT dated May 20, 2021, included as Appendix 14.4 of this MND.¹⁴⁸

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

Less Than Significant With Mitigation.

Consistency with Plans and Policies

The Project's consistency with plans and policies guiding development and transportation networks in Los Angeles is analyzed below. The plans and policies identified under Threshold T-1 of LADOT's Transportation Assessment Guidelines (TAG) have been utilized in the following consistency analysis.¹⁴⁹ A project would be considered consistent with a policy if it is generally in conformance and does not obstruct the implementation of that policy or preclude future improvements. If a conflict is identified, mitigation measures would focus on improving access, comfort, and safety for all road users, especially pedestrians, bicyclists, and transit riders.

Table 2.1-1 of the TAG identifies a series of City documents or plans that establish the regulatory framework for development in the City. Table 2.1-2 of the TAG provides a list of questions to help guide whether a project conflicts with the City's plans, programs, ordinances, or policies. Each of the documents listed in Table 2.1-1 of the TAG was reviewed for applicability to the Project, and the relevant transportation-related policies are summarized below, along with the Project's conformance.

Mobility Plan 2035

The Mobility Plan 2035 combines "complete street" principles with the following goals and objectives that define the City's mobility priorities:¹⁵⁰

¹⁴⁷ The Related Projects Technical Memorandum updates the related projects list included in the Transportation Assessment with four additional related projects and contains analysis demonstrating that the conclusions in the Transportation Assessment would not change as a result of the updated related projects list. This updated list and analysis has been incorporated into the analysis in this section of the MND.

¹⁴⁸ The LADOT Revised Transportation Assessment Approval Letter revises the Transportation Assessment's recommendation for a new traffic signal at the Mulholland Drive/West Driveway intersection (i.e., Mirman School's main driveway). Specifically, in lieu of recommending a new signal or any other improvements at this intersection at this time, LADOT will require monitoring of traffic at the intersection over a five-year period to determine whether any operational or safety issues arise, and if they do, LADOT will work with the School to determine what measures may be appropriate to implement. This requirement has been added as a mitigation measure in this section of the MND.

¹⁴⁹ Los Angeles Department of Transportation, Transportation Analysis Guidelines, July 2019.

¹⁵⁰ Los Angeles Department of City Planning, Mobility Plan 2035: An Element of the General Plan, last adopted by City Council on September 7, 2016.

- Safety First: Design: Operate streets in a way that enables safe access for all users, regardless of age, ability, or transportation mode choice.
- World Class Infrastructure: A well-maintained and connected network of streets, paths, bikeways, trails, and more provides Angelenos with the optimum variety of mode choices.
- Access for all Angelenos: A fair and equitable system must be accessible to all and must pay particularly close attention to the most vulnerable users.
- Collaboration, Communication, and Informed Choices: The impact of new technologies on our day-to-day mobility demands will continue to become increasingly important to the future.
- Clean Environments and Healthy Communities: Active transportation modes such as bicycling and walking can significantly improve personal fitness and create new opportunities for social interaction, while lessening impacts on the environment.

The Project would not conflict with these mobility goals. The Project would maintain designated driveway and roadway width requirements as indicated in the Mobility Plan, and existing vehicular, pedestrian, and bicycle traffic patterns would not change.

Although bicycle infrastructure is limited in the vicinity of the Project Site, the Project would encourage additional non-motorized travel to the extent it can be encouraged without designated bike routes along the segment of Mulholland Drive along which the Project Site is located. The Project would accomplish this, through the provision of new short-term and new long-term bicycle parking spaces that would meet LAMC bicycle parking requirements for the Project. As noted above, no changes to existing roadways or driveways are proposed, so existing accessibility to the Project Site would be maintained. Moreover, the Project's increase in daily trips associated with the enrollment and employee increases would be below the City's VMT screening criteria as discussed in Checklist Section XVII.b, Transportation, below, and therefore the increased VMT levels would not meet the significance thresholds. The Project's increased parking demand would also be accommodated by the existing parking supply.

The Project would not hinder other goals and policies identified in the Mobility Plan. Therefore, the Project is consistent with and would not obstruct the implementation of the Mobility Plan.

Plan for a Healthy Los Angeles

Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan introduces guidelines for the City to follow to enhance the City's position as a regional leader in health and equity, encourage healthy design and equitable access, and increase awareness of equity and environmental issues.¹⁵¹

The Project would be consistent with the Plan for a Healthy Los Angeles by continuing to provide for safety and access for all individuals utilizing the site by complying with all ADA requirements and providing distinct pedestrian and vehicular access points. Further, the Project supports healthy lifestyles by providing new short- and long-term bicycle parking spaces in accordance with LAMC requirements to

¹⁵¹ Los Angeles Department of City Planning, Plan for a Health Los Angeles: A Health and Wellness Element of the General Plan, March 2015.

meet anticipated demand, as well as providing ample outdoor recreational spaces for students and staff. Thus, the Project would be consistent with the goals of Plan for a Healthy Los Angeles.

Land Use Element of the General Plan

The City General Plan's Land Use Element contains 35 Community Plans that establish specific goals and strategies for the various neighborhoods across Los Angeles.¹⁵² The Project is located within the Brentwood–Pacific Palisades Community Plan (Community Plan) area. A detailed analysis of the Project's consistency with the Community Plan is provided in Table 11 in Checklist Section XI, Land Use, of this MND. The Project is also consistent with the circulation standards and criteria of the Community Plan as Mulholland Drive, the primary roadway providing access to and from the Project Site, would adequately serve the traffic generated by the Project without major congestion, as demonstrated by the Project's approved Transportation Assessment include as Appendix 14.1 of this MND. Therefore, the Project would be consistent with the Community Plan.

Los Angeles Municipal Code (LAMC)

LAMC Section 12.21.A.16 details the bicycle parking requirements for new developments. For private schools, LAMC Section 12.21 A.16(a)(2) requires four short-term bicycle parking spaces per classroom, and one long-term bicycle parking space per 10 classrooms, to be applied to new construction or additions. Per these requirements, the 10 new classrooms proposed under the Project would require a total of 40 short-term and 4 long-term bicycle parking spaces. Following the completion of the Project, the t, which would add 36 short-term and 4 long-term bicycle parking spaces, the total (existing plus proposed) of 40 short-term and 4 long-term bicycle parking spaces would meet LAMC bicycle parking space requirements for the Project.

LAMC Section 12.26.J is the City's TDM Ordinance, which establishes trip reduction requirements for non-residential projects in excess of 25,000 sf. The Project's proposes 22,508 square feet of new floor area which would not exceed 25,000 sf threshold, and therefore LAMC Section 12.26.J would not apply to the Project. Therefore, the Project would not conflict with the requirements of LAMC Section 12.26J. Nonetheless, the Project would implement measures that could reduce trips such as providing short- and long-term bicycle parking spaces.

LAMC Section 12.37 states that a project must dedicate and improve adjacent streets to half-right-of-way standards consistent with street designations from the Mobility Plan. Adjacent to the Project, Mulholland Drive is adequately dedicated and improved, and no additional dedication or improvement would be required in connection with the Project. According to the Mulholland Scenic Parkway Specific Plan (Specific Plan), Mulholland Drive must provide two travels in each direction with a maximum width of 15 feet, a 5-foot shoulder on at least one side of the street, and a 12-foot left turn lane when approved by the Director. Along the Project Site frontage Mulholland Drive generally provides two 12-foot travel lanes, one in each direction, 5-foot shoulders on both sides of the street, and a previously approved 10-foot-wide left-turn lane. Therefore, the Project would be consistent with LAMC Section 12.37 and the Specific Plan.

¹⁵² Los Angeles Department of City Planning, City of Los Angeles General Plan Framework Element, approved July 27, 1995.

Vision Zero

Vision Zero implements projects that are designed to increase safety on the most vulnerable City streets.¹⁵³ The City has identified a number of streets as part of the High Injury Network where City projects will be targeted. The Project Site is not located adjacent to a street identified as part of the High Injury Network. Moreover, the Project would not include alterations or improvements to the public right of way, and therefore would not preclude future potential Vision Zero safety improvements by the City along Mulholland, should they be deemed necessary. Thus, the Project does not conflict with Vision Zero.

Streetscape Plans

There are no streetscape plans adjacent to the Project Site and, therefore, streetscape plans do not apply to the Project. As set forth in Checklist Section XI, Land Use, of this MND, the Project would comply with the right of way standards and landscaping requirements of the Mulholland Scenic Parkway Specific Plan.

Citywide Design Guidelines for Residential, Commercial, and Industrial Development

The Citywide Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community.¹⁵⁴ The design guidelines are organized around the following approaches:

Pedestrian-First Design

- Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.
- Guideline 3: Design projects to actively engage with streets and public space and maintain human scale.

360-Degree Design

- Guideline 4: Organize and shape projects to recognize and respect surrounding context.
- Guideline 5: Express a clear and coherent architectural idea.
- Guideline 6: Provide amenities that support community building and provide an inviting, comfortable user experience.
- Guideline 7: Carefully arrange design elements and uses to protect site users.

Climate-Adapted Design

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

¹⁵³ City of Los Angeles, Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025, August 2015.

¹⁵⁴ City of Los Angeles Department of City Planning, Urban Design Studio, Citywide Design Guidelines, October 2019.

- Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users
- Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.

The Project would comply with the Specific Plan's standards pertaining to Mulholland Drive, as well as the Specific Plan's extensive development and landscaping requirements, as described in Checklist Section XI, Land Use, of this MND. Therefore, through compliance with these geographically specific design standards and policies, as well as implementation of features designed to keep Site users safe, the Project would align with the Citywide Design Guidelines.

Citywide Design Guidelines

The Citywide Design Guidelines, adopted October 24, 2019, establishes 10 guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. Although each of the Citywide Design Guidelines should be considered in a project, not all will be appropriate in every case. With regard specifically to transportation, the Citywide Design Guidelines include the following guidelines:

- Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all;
- Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience; and
- Guideline 7: Carefully arrange design elements and uses to protect site users

As evaluated under Checklist Question I.c of this MND, the Project would be consistent with these and the balance of the guidelines.

LADOT Transportation Technology Strategy—Urban Mobility in a Digital Age

The LADOT transportation technology strategy, based on Urban Mobility in a Digital Age: A Transportation Technology Strategy for Los Angeles, is designed to ensure the City stays on top of emerging transportation technologies as both a regulator and a transportation service provider.¹⁵⁵ This strategy is focused on City activities, and not individual development projects; notwithstanding, the Project would not interfere with any of the general policy recommendations and/or pilot proposals set forth by this strategy.

Mobility Hub Reader's Guide

Mobility Hubs: A Reader's Guide provides guidance for enhancing transportation connections and multi-modal improvements in proximity to new or existing transit stations. It specifically focuses on enhancing bicycle connections, providing vehicle sharing services, improving bus infrastructure, providing real-time transit and wayfinding information, and enhancing walkability and pedestrian connections.

¹⁵⁵ Los Angeles Department of Transportation, LADOT Manual of Policies and Procedures, December 2008.

While the Project Site is not well-served by existing transit or bicycle infrastructure, the Project would provide new bicycle parking spaces to meet LAMC requirements and anticipated demand that may facilitate and encourage bicycling to and from the Project and would not impede future transportation infrastructure along Mulholland Drive.

LADOT Manual of Policies and Procedures (Design Standards)

LADOT's Manual of Policies and Procedures provides plans and requirements for traffic infrastructure features in the City, including driveway design and placement guidelines in Section 321. The Project's existing driveways are not proposed to change and would remain consistent with this document's driveway location planning guidelines. The Project would not interfere with any of the policies and procedures contained in this document. Additionally, the Project would comply with applicable LADOT design standards.

Conclusion

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

Intersection Level of Service Analysis

As discussed above, in July 2019, LADOT updated the City's TAG to conform to the requirements of SB 743. The TAG replaced the Transportation Impact Study Guidelines (December 2016) and shifted the performance metric for evaluating transportation impacts under CEQA from LOS to VMT. The following intersection LOS analysis from the Transportation Assessment is included for informational purposes.

The Transportation Assessment analyzed the potential Project-generated transportation impacts on the intersections in the vicinity of the Project Site (e.g., the Study Area). Sixteen study intersections (12 signalized and 4 unsignalized) were selected for analysis during the MOU process based on their proximity to the Project Site and their potential to be impacted by Project traffic. The Study Area and the locations of the 16 study intersections are shown in Figure 25, while the study intersections are listed in Table 21. The existing lane configuration and traffic volumes at each of the intersections, and the existing number of lanes, street widths, and City of Los Angeles Mobility Plan 2035 designation of each of the streets leading into the intersections, are identified in the Traffic Assessment. Consistent with LADOT's *Transportation Impact Study Guidelines*, the following traffic scenarios were evaluated:

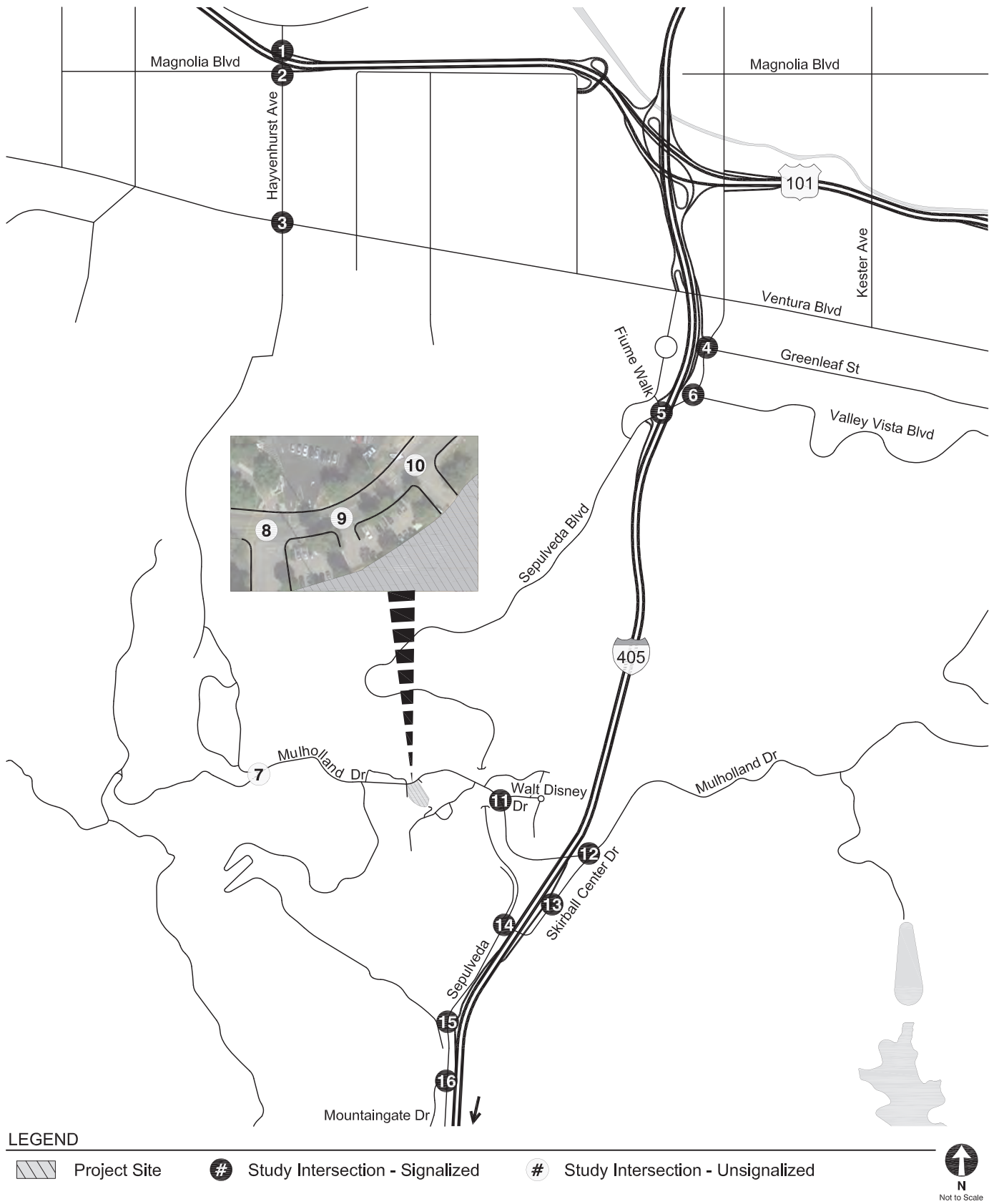


Figure 25
Study Area and Study Intersections

Table 21
Study Intersections

No.	Intersection	Jurisdiction
1	Hayvenhurst Ave. & US-101 Northbound Off-Ramp	City of Los Angeles/Caltrans
2	Hayvenhurst Ave. & Magnolia Blvd./US-101 Southbound On-Ramp	City of Los Angeles/Caltrans
3	Hayvenhurst Ave. & Ventura Blvd.	City of Los Angeles
4	Sepulveda Blvd. & I-405/US-101 Ramps/Greanleaf St.	City of Los Angeles/Caltrans
5	Sepulveda Blvd. & Fiume Walk	City of Los Angeles
6	Sepulveda Blvd. & Valley Vista Blvd.	City of Los Angeles
7 ^a	Calneva Dr. & Mulholland Dr.	City of Los Angeles
8 ^a	Main Driveway & Mulholland Dr.	City of Los Angeles
9 ^a	Driveway 2 & Mulholland Dr.	City of Los Angeles
10 ^a	Driveway 3 & Mulholland Dr.	City of Los Angeles
11	Walt Disney Dr. & Mulholland Dr.	City of Los Angeles
12	Skirball Center Dr. & Mulholland Dr.	City of Los Angeles
13	Skirball Center Dr. & I-405 Northbound Ramps	City of Los Angeles/Caltrans
14	Sepulveda Blvd. & Skirball Center Dr.	City of Los Angeles
15	Sepulveda Blvd. & I-405 Southbound Ramps	City of Los Angeles/Caltrans
16	Sepulveda Blvd. & Mountaingate Dr.	City of Los Angeles
^a <i>Unsignalized intersection.</i> Source: Gibson Transportation Consulting, Inc., <i>Transportation Assessment for the Mirman School for Gifted Children</i> July 2020.		

- Existing Conditions (2019): The analysis of existing traffic conditions provides a basis for the assessment of existing and future traffic conditions.
- Existing Plus Project Conditions (2019): The California Environmental Quality Act (CEQA) and LADOT require an evaluation of project traffic impacts on the existing environment as part of a traffic impact analysis. This analysis evaluates potential Project-related traffic impacts as compared to existing conditions during the analyzed peak periods by adding Project-generated traffic to the existing traffic on area streets.
- Future Without Project Conditions (2025): This analysis projects the future traffic growth and intersection operating conditions during the analyzed peak periods that could be expected as a result of regional growth and related projects in the vicinity of the Project Site when full enrollment associated with the Project is anticipated to occur (e.g., 2025).¹⁵⁶ The Future Without Project (2025) traffic conditions are projected by adding ambient traffic growth (compounded at one percent per year) and traffic from related projects to existing conditions. No future roadway improvements were assumed in the analysis of the Future Without Project or Future Plus Project Conditions to provide a more conservative analysis.

¹⁵⁶ Use of the anticipated full Project enrollment year (2025) rather than the anticipated Project buildout year (2022) provides a conservative analysis as ambient traffic volumes would be greater on the local roadway system in 2025 than in 2022.

- Future Plus Project Conditions (2025): This analysis identifies the potential incremental impacts of the Project at full enrollment on projected future traffic operating conditions during the analyzed peak periods by adding the net Project-generated traffic to the Future Without Project traffic forecasts for the year 2025.

Existing traffic is expected to increase as a result of regional growth and development outside the Study Area. Based on discussions with LADOT through the MOU process, a conservative ambient growth factor of 1 percent per year compounded annually was used to adjust the existing traffic volumes to reflect the effects of the regional growth and development by Year 2025. In addition, the forecasted trip generation from 16 related projects in the Study Area listed in Table 22 was also incorporated into the analysis. This list of related projects was initially generated in consultation with LADOT and the City of Los Angeles Department of City Planning (LADCP) in 2019 and was subsequently updated by LADOT and LADCP in 2021. As part of 2021 update, LADOT and LADCP identified several new related projects and also removed several projects from the initial list. For purposes of conservative analysis, it has been assumed that all 16 related projects that have been identified in 2019 and 2021 remain active projects. Furthermore, while it is uncertain whether all 16 related projects would be completed by the Future Condition (2025), they were all considered to be completed by this year to further provide a conservative analysis. See Figure 5 of the Transportation Assessment for a map identifying the locations of the related projects.

Existing turning movement counts were conducted at the study intersections during the weekday commuter/school morning (7:00 A.M. to 10:00 A.M.), school afternoon (2:00 P.M. to 4:00 P.M.), and commuter afternoon (4:00 P.M. to 6:00 P.M.) peak periods in October 2016 and May/June 2017, when local schools were in session. Based on the project growth rate for this region found in the CMP and coordination with LADOT, a 1 percent per year compounded ambient growth factor was applied to the traffic counts conducted in Year 2016 and Year 2017 to reflect Year 2019 traffic volumes.

Existing without and with Project traffic conditions at the study intersections was compared to future without and with Project traffic conditions at the study intersections, respectively. Potential intersection impacts were evaluated for typical weekday commuter/school morning (7:00 A.M. to 10:00 A.M.), school afternoon (2:00 P.M. to 4:00 P.M.), and commuter afternoon (4:00 P.M. to 6:00 P.M.) peak periods. The school afternoon peak hour is based on the scheduled student dismissal.

Signalized Intersections

Signalized intersection capacity was analyzed using the “Critical Movement Analysis (CMA)—Planning” (*Transportation Research Circular No. 212, Interim Materials on Highway Capacity*, Transportation Research Board, 1980) methodology required by the City. The CMA methodology was implemented using LADOT’s CalcaDB Lite spreadsheet application to analyze intersection operating conditions. The methodology calculates the volume-to-capacity (V/C) ratio, which is used to determine the intersection level of service (LOS) according to the LOS definitions provided in Table 23.

As described further in the Transportation Assessment, each of the signalized study intersections is equipped with both Automated Traffic Surveillance and Control (ATSAC) and Adaptive Traffic Control System (ATCS). In accordance with standard LADOT procedures, a capacity increase of 10 percent (0.10 V/C adjustment) was applied to each of these intersections to reflect the benefits of ATSAC and

**Table 22
Related Projects**

No.	Project	Address	Description
1	Curtis School	15871 W. Mulholland Dr.	TDM program per conditional use permit
2	Woodrise Mixed-Use	16130 Ventura Blvd.	51 apartment units with 19,400 sf retail and 1,063 sf office
3	Hotel	15821 Ventura Blvd.	180-room hotel
4	Tract 62077 Mixed-Use	15222 Ventura Blvd.	52 condo units and 7,460 sf specialty retail
5	Valley Beth Shalom Preschool	15739 Ventura Blvd.	Increase in enrollment from 820 to 1,079 students
6	Bank	15821 Ventura Blvd.	6,115 sf bank
7	Coffee Shop	15315 Dickens St.	10,000 sf coffee shop
8	Convenience Store	15445 Ventura Blvd.	2,770 sf convenience store
9	Mixed-Use	16206 Ventura Blvd.	12,880 sf mixed-use
10	Apartments	16161 Ventura Blvd.	114 apartment units
11	Recreational Park	2301 N. Sepulveda Blvd.	Improvements to 500-acre recreational park
12	Apartments	4741 Libbit Ave.	46 apartment units
13	Stephen Wise middle School Relocation	15,900 Mulholland Dr.	Relocation of middle school
14	Stephen S. Wise Nursery School	15500 Stephen Wise Dr.	240-student nursery school
15	Hotel	15481 Ventura Blvd.	157-room hotel replacing 70-room motel
16	Medical Office	15503 Ventura Blvd.	2,054 sq. ft. use change from general office to medical office
<i>Source: Gibson Transportation Consulting, Inc., Traffic Analysis of Updated Related Projects List for the Mirman School for Gifted Children (i.e., Related Projects Technical Memorandum), July 26, 2021.</i>			

ATCS control. The capacity increases are applied within the CalcaDB Lite software and, therefore, are inherent in the analysis results.

The significance of the potential impacts of Project-generated traffic at the signalized study intersections was determined using criteria identified in *Transportation Impact Study Guidelines*. LADOT guidelines indicate that a project is considered to have a significant transportation impact on a signalized intersection if the increase in the V/C ratio attributable to the project exceeds a specific threshold depending on the final intersection LOS. LADOT has developed a sliding scale methodology in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the V/C ratio of the intersection increases. These standards are presented in Table 24. The relative impact of the added traffic volumes to be generated by the Project was evaluated based on analysis of existing and future operating conditions at the study intersections, with and without the Project.

Existing (2019) Without Project operations at the signalized study intersections, in the form of V/C ratios and corresponding LOS during the weekday morning peak period, the school afternoon peak period, and during the P.M. commuter peak period are summarized in Table 25. As shown therein,

Table 23
Level of Service Definitions for Intersections

Level of Service	Signalized V/C Ratio ^a	Delay ^b	Definition
A	0.000–0.600	0.0–10.0	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601–0.700	10.1–20.0	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701–0.800	20.1–35.0	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801–0.900	35.1–55.0	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901–1.000	55.1–80.0	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	> 80.0	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.
V/C = volume-to-capacity ratio ^a <i>Transportation Research Circulator No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980.</i> ^b <i>Highway Capacity Manual 2010, Transportation Research Board, 2016.</i> Source: Gibson Transportation Consulting, Inc., <i>Transportation Assessment for the Mirman School for Gifted Children</i>, July 2020.			

nine of the 12 signalized study intersections currently operate at LOS D or better during the analyzed peak hours. The remaining three signalized study intersections, including Intersections 14 (Sepulveda Blvd./Skirball Center Dr.), 15 (Sepulveda Blvd./I-405 SB Ramps), and 16 (Sepulveda Blvd./Mountaingate Dr.), currently operate at LOS E or F during at least one of the analyzed peak hours.

Future (2025) Without Project operations at the signalized study intersections during the previously referenced peak hours are also summarized in Table 25. As shown therein, eight of the 12 signalized study intersections are projected to operate at LOS D or better during the analyzed peak, with the remaining four intersections (e.g., Intersections 14–16 as identified above, and Intersection 3 (Hayvenhurst Ave./Magnolia Blvd/US 101 SB On-ramp) projected to operate at LOS E or F during at least one of the analyzed peak hours.

Mirman School currently operates under a CUP that allows a maximum enrollment of 330 full-time students. The school is seeking to increase enrollment to a maximum of 430 students, with the existing number of on-site faculty and staff anticipated to increase from 78 to approximately 108 employees. Student enrollment and employees would be increased over five years, with Project buildout in late 2023

Table 24
LADOT Criteria for Significant Intersection Impacts

Intersection Conditions with Project Traffic		Significant Impact Threshold for Project-Related Increase in V/C Ratio
LOS	V/C	
C	0.701–0.800	Equal to or greater than 0.04
D	> 0.801–0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01
<i>LOS = level of service</i> <i>V/C = volume-to-capacity ratio</i> <i>Source: Gibson Transportation Consulting, Inc., Transportation Assessment for the Mirman School for Gifted Children, July 2020.</i>		

and full enrollment by year 2025. Table 7 in the Transportation Assessment identifies the Project's trip generation. As indicated therein, the Project would generate approximately 234 net new average daily trips (ADT), including 91 net new trips in the morning peak hour (50 inbound and 41 outbound trips), 62 net new trips in the school peak afternoon peak hour (29 inbound and 33 outbound trips), and 26 net new trips in the afternoon commuter peak hour (12 inbound and 14 outbound trips). See Table 7 in the Transportation Assessment for the Project trip generation calculations.

As shown in Table 25, nine of the 12 signalized study intersections would continue to operate at LOS D or better during all analyzed peak hours under Existing (2019) with Project Conditions, while the remaining three signalized study intersections, including Intersections 14 (Sepulveda Blvd./Skirball Center Dr.), 15 (Sepulveda Blvd./I-405 SB Ramps) and 16 (Sepulveda Blvd./Mountaingate Dr.), would continue to operate at LOS E or F during at least one of the analyzed peak hours. Therefore, the Project would result in less than significant operational level of service impacts at the signalized study intersections under Existing (2019) With Project Conditions.

As shown in Table 25, nine of the 12 signalized study intersections are anticipated to continue to operate at LOS D or better during all analyzed peak hours under Future (2025) with Project Conditions. The remaining three intersections, including Intersections 14 (Sepulveda Blvd./Skirball Center Dr.), 15 (Sepulveda Blvd./I-405 SB Ramps) and 16 (Sepulveda Blvd./Mountaingate Dr.), are anticipated to continue to operate at LOS E or F during at least one of the analyzed peak hours. Therefore, the Project would result in less than significant operational level of service impacts at the signalized study intersections under Future (2025) With Project Conditions.

Unsignalized Intersections

Based on LADOT's *Transportation Impact Study Guidelines*, the unsignalized intersections (Intersections 7–10) were evaluated to determine the need for the installation of a traffic signal.¹⁵⁷ The unsignalized

¹⁵⁷ Pursuant to the *Transportation Impact Study Guidelines*, unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device(s), but are not to be included in a project's impact analysis

Table 25
Intersection Levels of Service Analysis—Signalized Intersections

No.	Intersection	Peak Hour ^a	Existing (2019) Without Project		Existing (2019) with Project				Future (2025) Without Project		Future (2025) with Project			
			V/C	LOS	V/C	LOS	Change in V/C	Impact	V/C	LOS	V/C	LOS	Change in V/C	Impact
1 ^b	Hayvenhurst Ave. & US-101 Northbound Off-Ramp	A.M.	0.405	A	0.405	A	0.000	No	0.444	A	0.444	A	0.000	No
		School P.M.	0.250	A	0.250	A	0.000	No	0.276	A	0.276	A	0.000	No
		P.M.	0.517	A	0.517	A	0.000	No	0.561	A	0.561	A	0.000	No
2 ^b	Hayvenhurst Ave. & Magnolia Blvd./US-101 Southbound On-Ramp	A.M.	0.805	D	0.807	D	0.002	No	0.814	D	0.815	D	0.001	No
		School P.M.	0.361	A	0.361	A	0.000	No	0.394	A	0.395	A	0.001	No
		P.M.	0.661	B	0.661	B	0.000	No	0.714	C	0.715	C	0.001	No
3 ^b	Hayvenhurst Ave. & Ventura Blvd.	A.M.	0.843	D	0.847	D	0.004	No	0.889	D	0.891	D	0.002	No
		School P.M.	0.601	B	0.604	B	0.003	No	0.656	B	0.659	B	0.003	No
		P.M.	0.775	C	0.777	C	0.002	No	0.843	D	0.844	D	0.001	No
4	Sepulveda Blvd. & I-405/US-101 Ramps/Greanleaf St.	A.M.	0.736	C	0.737	C	0.001	No	0.744	C	0.744	C	0.000	No
		School P.M.	0.769	C	0.770	C	0.001	No	0.830	D	0.831	D	0.001	No
		P.M.	0.794	C	0.795	C	0.001	No	0.859	D	0.859	D	0.000	No
5	Sepulveda Blvd. & Fiume Walk	A.M.	0.601	B	0.602	B	0.001	No	0.645	B	0.647	B	0.002	No
		School P.M.	0.256	A	0.256	A	0.000	No	0.281	A	0.282	A	0.001	No
		P.M.	0.398	A	0.398	A	0.000	No	0.433	A	0.433	A	0.000	No
6 ^b	Sepulveda Blvd. & Valley Vista Blvd.	A.M.	0.713	C	0.714	C	0.001	No	0.716	C	0.717	C	0.001	No
		School P.M.	0.456	A	0.457	A	0.001	No	0.496	A	0.497	A	0.001	No
		P.M.	0.498	A	0.499	A	0.001	No	0.540	A	0.540	A	0.000	No
11	Walt Disney Dr. & Mulholland Dr.	A.M.	0.459	A	0.471	A	0.012	No	0.464	A	0.476	A	0.012	No
		School P.M.	0.456	A	0.472	A	0.016	No	0.504	A	0.519	A	0.015	No
		P.M.	0.445	A	0.452	A	0.007	No	0.491	A	0.497	A	0.006	No
12	Skirball Center Dr. & Mulholland Dr.	A.M.	0.839	D	0.858	D	0.019	No	0.870	D	0.889	D	0.019	No
		School P.M.	0.517	A	0.527	A	0.010	No	0.613	B	0.624	B	0.011	No
		P.M.	0.351	A	0.355	A	0.004	No	0.437	A	0.441	A	0.004	No
13 ^b	Skirball Center Dr. & I-405 Northbound Ramps	A.M.	0.648	B	0.663	B	0.015	No	0.664	B	0.679	B	0.015	No
		School P.M.	0.438	A	0.447	A	0.009	No	0.494	A	0.502	A	0.008	No
		P.M.	0.693	B	0.698	B	0.005	No	0.767	C	0.772	C	0.005	No
14	Sepulveda Blvd. & Skirball Center Dr.	A.M.	1.109	F	1.115	F	0.006	No	1.116	F	1.123	F	0.007	No
		School P.M.	0.602	B	0.609	B	0.007	No	0.679	B	0.666	B	0.007	No
		P.M.	0.796	C	0.798	C	0.002	No	0.886	D	0.888	D	0.002	No
15 ^b	Sepulveda Blvd. & I-405 Southbound Ramps	A.M.	1.087	F	1.090	F	0.003	No	1.092	F	1.094	F	0.002	No
		School P.M.	0.749	C	0.753	C	0.004	No	0.821	D	0.824	D	0.003	No
		P.M.	0.950	E	0.952	E	0.002	No	1.030	F	1.032	F	0.002	No

Table 25 (Continued)
Intersection Levels of Service Analysis—Signalized Intersections

No.	Intersection	Peak Hour ^a	Existing (2019) Without Project		Existing (2019) with Project				Future (2025) Without Project		Future (2025) with Project			
			V/C	LOS	V/C	LOS	Change in V/C	Impact	V/C	LOS	V/C	LOS	Change in V/C	Impact
16	Sepulveda Blvd. & Mountaingate Dr.	A.M.	0.923	E	0.926	E	0.003	No	0.927	E	0.930	E	0.003	No
		School P.M.	0.399	A	0.401	A	0.002	No	0.435	A	0.437	A	0.002	No
		P.M.	0.797	C	0.798	C	0.001	No	0.857	D	0.858	D	0.001	No

LOS = level of service

V/C = volume-to-capacity ratio

^a The school P.M. peak hour generally occurs between 2:00 and 4:00 P.M. due to the student dismissal schedule. The P.M. peak hour of adjacent streets (i.e., commuter P.M. peak hour) typically occurs between 4:00 and 6:00 P.M.

^b LOS calculated with reduced capacities in CMA worksheets in the A.M. and commuter P.M. peak hour conditions, as the CMA methodology for individual intersections does not in every case account for vehicular queues along corridors, pedestrian conflicts, etc., and thus, the calculated average operating conditions may appear better than is observed.

Source: The No., Intersection, Peak Hour, Existing, and Existing with Project columns are from Gibson Transportation Consulting, Inc., Transportation Assessment for the Mirman School for Gifted Children July 2020. The six Future Without Project and Future with Project columns are from Gibson Transportation Consulting, Inc., Traffic Analysis of Updated Related Projects List for the Mirman School for Gifted Children (i.e., Related Projects Technical Memorandum), July 26, 2021.

intersections were analyzed using Highway Capacity Manual, 6th Edition (Transportation Research Board, 2016) (HCM) methodology to determine the overall intersection delay. The HCM methodology calculates the average delay, in seconds, of a vehicle passing through the intersection in any direction. The average delay is used to determine the intersection LOS according to the LOS definitions provided in Table 23. The LOS calculation worksheets for each scenario are included in Appendix E of the Transportation Assessment.

Pursuant to Transportation Impact Study Guidelines, if, based on the estimated delay, the resultant LOS is E or F in the Future with Project Conditions, the intersection should be evaluated for the potential installation of a new traffic signal through a traffic signal warrant analysis. It should be noted that the determination that an unsignalized intersection meets the criteria of a traffic signal warrant does not in itself require the installation of a signal. Rather, the decision on whether a traffic signal should be installed is made by the governing jurisdictions taking into consideration other factors such as distance to adjacent signalized intersections and interruption to traffic flow along the major street.

As indicated previously, the 16 study intersections include four unsignalized intersections. These four intersections are listed below:

7. Calneva Dr./Mulholland Dr.
8. Main Driveway/Mulholland Dr.
9. Driveway 2/Mulholland Dr.
10. Driveway 3/Mulholland Dr.

The four unsignalized study intersections were analyzed using the HCM methodology to determine the overall intersection delay under both Existing (2019) and Future (2025) Conditions peak hours. Table 26 summarizes the weekday morning and afternoon peak hour delays and corresponding LOS for the four unsignalized study intersections under Existing (2019) and Future (2025) Conditions. As shown therein, all four unsignalized study intersections would operate at LOS E or F during at least one of the analyzed peak hours under Existing (2019), Existing (2019) with Project, Future (2025), and Future (2025) with Project Conditions. Therefore, further traffic signal warrant analysis was conducted using Warrant 3 (see the Transportation Assessment for further discussion of Warrant 3).

Table 26 also summarizes the results of the signal warrant analysis for the four unsignalized study intersections. As indicated therein, signal warrants are/would be met at Intersections 7 and 8 under all four analysis scenarios. However, the satisfaction of the warrant threshold alone does not in itself dictate the requirement of the installation of a traffic control signal. That decision is made by the affected jurisdiction (e.g., LADOT or Caltrans), which would consider additional factors such as spacing with adjacent intersections, interruption of traffic flow on the major streets, etc. Because Intersection 8 (Mulholland Drive/West Driveway) would handle the majority of Project traffic, a traffic signal was recommended at this intersection in the Transportation Assessment. However, on May 20, 2021, LADOT issued a Revised Transportation Assessment Approval Letter, included as Appendix 14.4 of this MND, where it revised this recommendation. Accordingly, the following LADOT-revised mitigation measure is recommended at Intersection 8:

Table 26
Intersection Levels of Service Analysis—Unsignalized Intersections

No.	Intersection	Peak Hour	Existing (2019) Without Project			Existing (2019) With Project			Future (2025) Without Project			Future (2025) with Project		
			Delay	LOS	Meets Warrants	Delay	LOS	Meets Warrants	Delay	LOS	Meets Warrants	Delay	LOS	Meets Warrants
7 ^a	Calneva Dr. & Mulholland Dr.	A.M.	66.3	F	Yes	69.4	F	Yes	116.9	F	Yes	122.5	F	Yes
		School P.M.	18.1	C		18.6	C		20.3	C		21.0	C	
		P.M.	24.2	C		29.0	D		39.3	E		40.4	E	
8	Main Driveway & Mulholland Dr.	A.M.	348.4	F	Yes	362.6	F	Yes	404.0	F	Yes	419.4	F	Yes
		School P.M.	21.7	C		23.0	C		28.1	D		30.1	D	
		P.M.	21.7	C		22.2	C		32.7	D		33.6	D	
9 ^a	Driveway 2 & Mulholland Dr.	A.M.	36.3	E	No	38.6	E	No	43.2	E	No	46.5	E	No
		School P.M.	11.4	B		11.6	B		11.8	B		12.0	B	
		P.M.	9.4	A		9.5	A		9.6	A		9.7	A	
10 ^a	Driveway 3 & Mulholland Dr.	A.M.	41.5	E	No	47.1	E	No	50.1	F	No	58.2	F	No
		School P.M.	14.9	B		14.4	B		15.7	C		15.1	C	
		P.M.	10.2	B		10.3	B		10.5	B		10.7	B	

LOS = level of service

^a Worst-case delay reported at 2-way stop-controlled or uncontrolled location.

Source: Gibson Transportation Consulting, Inc., Transportation Assessment for Mirman School for Gifted Children, July 2020. From City of Los Angeles Department of Transportation.

Mitigation Measure TR-1: Intersection 8 (Mulholland Drive/West Driveway). The applicant has considered the installation of a new traffic signal at the westerly driveway on Mulholland Drive, due to the additional trips generated by the Project. The Applicant will work with LADOT to monitor the location for a period of five years after completion of the Project. Should any operational or safety issues arise, LADOT will work with the school to determine the appropriate measure(s) to address the issue. The determination regarding appropriate measures needed shall be subject to concurrence/approval from the LADOT West Valley District Office. All cost for the design and implementation of improvement measures deemed necessary by LADOT under this condition shall be the responsibility of the Project.

Additionally, LADOT's August 14, 2020, Transportation Assessment Approval Letter, included as Appendix 14.2 of this MND, identifies several transportation-related requirements for the Project, which are incorporated as mitigation measures below.

Mitigation Measure TR-2: Parking Requirements. Parking for vehicles and bicycles will be provided onsite. The applicant should check with the Department of Building and Safety on the number of Code-required parking spaces needed for this project.

Mitigation Measure TR-3: Highway Dedication and Street Widening Requirements. In order to mitigate potential access and circulation impacts, the applicant may be required to make highway dedications and improvements. The applicant shall consult the Bureau of Engineering (BOE) for any highway dedication or street widening requirements. These requirements must be guaranteed before the issuance of any building permit through the B-permit process of the BOE. They must be constructed and completed prior to the issuance of any certificate of occupancy to the satisfaction of DOT and BOE.

Mitigation Measure TR-4: Project Access and Circulation. The proposed site plan is acceptable to DOT; however, review of the study does not constitute approval of the driveway dimensions and internal circulation schemes. Those require separate review and approval and should be coordinated with DOT's West LA/Coastal Development Review Section (7166 W Manchester Ave, @ 213-485-1062). In order to minimize potential building design changes, the applicant should contact DOT for driveway width and internal circulation requirements so that such traffic flow considerations are designed and incorporated early into the building and parking layout plans. All new driveways should be Case 2 driveways and any security gates should be a minimum 20 feet from the property line. All truck loading and unloading should take place on site with no vehicles backing into the project from public streets via any of the project driveways.

Mitigation Measure TR-5: Worksite Traffic Control Requirements. DOT recommends that a construction work site traffic control plan be submitted to DOT's Citywide Temporary Traffic Control Section or Permit Plan Review Section for review and approval prior to the start of any construction work. Refer to <http://ladot.lacity.org/what-we-do/plan-review> to determine which section to coordinate review of the work site traffic control plan. The plan should show the location of any roadway or sidewalk closures, traffic detours, haul routes, hours of operation, protective devices, warning signs and access to abutting properties. DOT also recommends that all construction related truck traffic be restricted to off-peak hours to the extent feasible.

Mitigation Measure TR-6. Development Review Fees: Section 19.15 of the LAMC identifies specific fees for traffic study review, condition clearance, and permit issuance. The applicant shall comply with any applicable fees per this ordinance.

As set forth above and as mitigated herein, the Project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, impacts would be less than significant with mitigation.

Construction Analysis

The following is based on the *Construction Traffic Impact Analysis for the Mirman School for Gifted Children* prepared by Gibson Transportation Consulting Inc., dated June 22, 2020, and included as Appendix 14.1 of this MND. This analysis is provided for information purposes as, per the TAG (Section 3.4, Project Construction), the Project would result in fewer than 250 average daily trips and thus does not require a construction traffic analysis.

TAG Section 3.4.3 asks whether construction of a project would substantially interfere with pedestrian, bicycle, transit, or vehicle circulation and accessibility to adjoining areas. Such interference from construction could potentially occur as a result of the following types of activities:

- Increases in truck traffic associated with export or import of fill materials and delivery of construction materials via trucks.
- Increases in automobile traffic associated with construction workers traveling to and from the Project site.
- Reductions in existing street capacity or on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation, and drainage facilities.
- Blocking of existing vehicle or pedestrian access to other parcels fronting streets.

The potential impact of construction traffic (including haul trucks) would be a lessening of the capacities of access streets and haul routes due to the slower movements and larger turning radii of trucks.

Construction Impacts on Roadway Capacity

The Project is anticipated to be constructed over a period of approximately 14 months, from mid-2022 through late 2023. Peak haul truck activity would occur during excavation and grading, while peak worker activity would occur during building construction and interior finishing. These two construction phases were studied in greater detail. Typical construction activity would primarily occur between 7:00 A.M. and 3:00 P.M. with haul truck activity primarily restricted to between 9:00 A.M. and 3:00 P.M. To the extent feasible, the busiest construction activity would occur during the summer months when on-campus activities are minimal.

Excavation and Grading Phase

The peak period of truck activity during construction would occur during excavation and grading of the Project Site. Haul trucks would travel on approved truck routes designated within the City. Given the

Project Site's proximity to I-405, haul truck traffic would take the most direct route to the appropriate freeway ramps. As indicated in Figure 13 and 14, loaded trucks would travel east along Mulholland Drive to I-405 and then mostly likely either north on I-405 to the Lopez Canyon Landfill or south and then east to the Puente Hills Landfill, with empty trucks traveling in the opposite directions. The haul route would be reviewed and approved by the City.

Approximately 2,200 cubic yards of material would be excavated and removed from the Project Site over an approximately seven-workday period, resulting in up to 46 daily truck trips (23 inbound, 23 outbound) during the excavation and grading period. This translates to approximately eight truck trips per hour (approximately four inbound, approximately four outbound) if occurring uniformly over a typical 6-hour haul period of 9:00 A.M. to 3:00 P.M., outside of the peak hours. Large trucks were converted into a passenger car equivalent (PCE) of one truck is equal to 2.0 commuter vehicles. Assuming a PCE factor of 2.0, the 46 truck trips would be equivalent to 92 daily PCE trips or 16 hourly PCE trips (eight inbound, eight outbound) per hour.

It is also anticipated that approximately 10 construction workers would be on-site per day during the excavation and grading phase, resulting (after assuming minimal carpooling for these workers) in an estimated nine daily construction worker trips arriving and departing the Project Site each day.

With the implementation of the proposed Construction Traffic Management Plan set forth in the mitigation measure below, it is anticipated that haul truck activity to and from the Project Site would occur outside of the morning and afternoon peak hours to the extent feasible. In addition, as discussed in more detail in the following section, worker trips to and from the Project Site would also occur outside of the peak hours. Therefore, no peak hour construction traffic impacts are expected during the excavation and grading phase of construction.

Mitigation Measure TR-7: A detailed Construction Traffic Management Plan will be prepared and submitted to the City for review and approval. The Construction Traffic Management Plan will formalize how construction will be carried out and identify specific actions required to reduce effects on the surrounding community. The Construction Traffic Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site and may include, but not be limited to, the following elements, as appropriate:

- Prohibition of construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside the commuter peak hours with no hauling before 9 A.M. or after 3 P.M.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Installation of truck crossing signs within 300 feet of the exit of the Project Site in each direction.

- Sufficient dampening of the construction area to control dust caused by grading and hauling, and reasonable control of dust caused by wind at all times.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- A minimum of two flag persons are required. One flag person is required at the entrance to the project site and one flag person at the next intersection along the haul route.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

Building and Construction Phase

The traffic impacts associated with construction workers depend on the number of construction workers employed during various phases of construction, as well as the travel mode and travel time of the workers. In general, the hours of construction typically require workers to be on-site before the weekday morning commuter peak period and allow them to leave before the afternoon commuter peak period (i.e., arrive at the site prior to 7:00 A.M. and depart before 3:00 P.M.). Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods and before the school pick-up and drop-off activity periods.

It is estimated that approximately 60 workers would be on the construction site per day during the building construction phase which (after accounting for minimal carpooling) would result in an estimated 53 total construction worker vehicle trips per day arriving and departing the Project Site, or 106 average daily trips. However, nearly all of those trips would occur outside of the commuter peak hours. As such, the building construction phase is not expected to result in a significant traffic impact. During construction, adequate parking for construction workers would be secured on-site or at the adjacent large surface parking lot. Workers would be restricted from parking in the public right-of-way in the vicinity of (or adjacent to) the Project Site as part of the Construction Traffic Management Plan required under Mitigation Measure TR-7.

Construction Impacts on Access, Transit, and Parking

Construction activities are expected to be primarily contained within the Project Site boundaries. Encroachments into the public right-of-way (e.g., sidewalk) adjacent to the Project Site along Mulholland Drive are not anticipated to occur during any phase of construction. Travel lanes would be maintained in each direction on Mulholland Drive throughout the construction period, and emergency access would not be impeded.

No bus stops are located adjacent to the Project Site. Therefore, no bus stop relocation or bus rerouting would be required, and no temporary impacts to transit are expected. Project construction activities are not anticipated to result in any on-street parking removals along Mulholland Drive.

Project construction is not expected to create hazards for drivers, bicyclists, or pedestrians as long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Traffic Management Plan proposed, as mitigated herein. The construction-related impacts associated with access, transit, and parking are anticipated to be less than significant, and the implementation of the Construction Traffic Management Plan would further reduce those impacts.

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

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

Construction

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

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

All construction activities for the Project would be contained within the Project Site and the adjacent parking lot along Mulholland Drive. No traffic lanes, alleys, or streets would require closure during construction of the Project, and there would be no off-site staging of trucks. In addition, no temporary fencing or barricades would be installed along any public roadways. As there are no existing transit stops or bicycle facilities along the segment of Mulholland Drive abutting the Project Site, and as Project

construction activities would not extend into the travel lanes of Mulholland Drive, Project construction activities would also not interfere with transit stops or existing bicycle facilities.

Additionally, pursuant to Mitigation Measure TR-7, prior to issuance of building permits, the Project would prepare a Construction Traffic Management Plan, to be approved by the LADOT, which would detail the designated haul routes and staging areas, traffic control procedures, emergency access provisions, and construction crew parking. LADOT approval would be requested for any temporary changes in traffic control due to construction activities and, the Project would implement appropriate temporary traffic control procedures, as necessary. In addition, the Project's haul route for the export of earth materials would require approval by the Board of Building and Safety Commissioners, after receiving input from LADOT and Bureau of Street Services staff and would be subject to conditions of approval to minimize the potential impact of construction traffic on congested roadways and residential streets.

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

Operation

State of California SB 743 (Steinberg, 2013) (SB 743), made effective in January 2014, required the Governor's Office of Planning and Research to change the CEQA guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay (level of service [LOS]) to vehicle miles traveled (VMT) in order to reduce of greenhouse gas emissions, create multimodal networks, and promote mixed-use developments. To adapt to SB 743, the Los Angeles City Planning Commission, on February 28, 2019, recommended the approval of revised guidelines to include new transportation analysis screening procedures and thresholds, subsequently approved by the Los Angeles City Council on July 30, 2019. LADOT's TAG (July 2019) defines the methodology of analyzing a project's transportation impacts in accordance with SB 743. Per Section 1.3 of the TAG, the City requires the preparation and submission of a transportation impact assessment for development projects that meet the following criteria:

- If the Development Project is estimated to generate a net increase of 250 or more daily vehicle trips and requires discretionary action, a transportation assessment for a Development Project is required.
- If a Transportation Project is likely to either: (1) induce additional vehicle miles traveled by increasing vehicle capacity; or (2) reduce roadway through-lane capacity on a street that exceeds 750 vehicles per hour per lane for at least two (2) consecutive hours in a 24-hour period after the project is completed, a transportation assessment is generally required.
- A transportation assessment is required by City ordinance or regulation.

As detailed in Section 2.2.2 of the TAG, a "no impact" determination for Project VMT impacts can be made if either: (1) the Project would generate less than 250 daily vehicle trips; or (2) the Project would not generate a net increase in daily VMT.

Application of LADOT's VMT Calculator (Version 1.2) to the Project indicates that the addition of 100 students under the Project would add only 234 daily vehicle trips to the street system. Therefore, given this low number of daily trips and associated limited VMT, the Project would not meet LADOT

screening criteria for preparing a Transportation Assessment or performing further analysis regarding VMT. Accordingly, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, no impact would occur, and no mitigation measures are required.

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

Less Than Significant With Mitigation. The Project's design does not include hazardous design features. The winding hillside roadways adjacent to the Project Site are part of the existing urban roadway network. No new driveways or improvements to the existing driveways off of Mulholland Drive would occur. The Project design would also be reviewed by LADBS and the LAFD during the City's plan review process to ensure all applicable requirements are met. Moreover, the Project would not introduce incompatible uses such as farm equipment to the Project Site.

With regard to circulation, as shown in Figure 12 of the Transportation Assessment, all student pick-up and drop-off operations would occur within the existing parking areas, with looping circulation through the adjacent parking lot owned by the Bel Air Presbyterian Church. This circulation pick-up/drop-off scheme would provide approximately 1,300 feet of queuing space that would avoid overflow onto Mulholland Drive.

Given the winding hillside terrain, with mitigation herein, there will be no impacts associated with hazardous design features or incompatible uses. With the implementation of the mitigation measures herein, all impacts are expected to be less than significant.

Mitigation Measure TR-8 (Safety Hazards). Environmental impacts may result from project implementation due to hazards to safety from design features (e.g., sharp curves or dangerous intersections) or incompatible uses. However, the potential impacts can be mitigated to a less than significant level by the following measure.

- The developer shall install appropriate traffic signs around the site to ensure pedestrian, bicycles, and vehicle safety.
- The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents, to the Bureau of Engineering and the Department of Transportation for approval.

Mitigation Measure TR-9 (Pedestrian Safety).

- Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.) from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the project site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

d. Would the project result in inadequate emergency access?

Less Than Significant Impact. The Project Site is located along Mulholland Drive, approximately 0.75 mile west of I-405. During Project construction and operation, primary emergency access would continue to be provided from the three existing driveways into the Project Site from Mulholland Drive, while secondary emergency access would continue to be provided from Berkeley Hall School via an existing fire lane. Additionally, Project construction activities and the staging of construction equipment would primarily occur within the existing Mirman School campus, and a Construction Traffic Management Plan (Mitigation Measure TR-7) would be implemented during construction that would include specific measures to be implemented by the contractor(s) to ensure safe and adequate emergency access to the Project Site and adjacent properties. Furthermore, the driveways from Mulholland Drive into the Project Site would continue to be in accordance with City cross-section and other applicable requirements under the Project, and student pick-up and drop-off operations would continue to occur internally to the Project Site within the existing on-site parking area and existing adjacent church parking lot so as to not interfere with vehicular circulation on Mulholland Drive. Lastly, Project Site evacuation plans and procedures would be provided to the LAFD prior to issuance of building permits and would be maintained during Project operation. Therefore, the Project would not result in inadequate emergency access. The impact would be less than significant, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

The following analysis is based on the Confidential Tribal Cultural Resources Report for the Mirman School Project (TCR Report) dated July 2021 and included as Appendix 15 of this MND and the results of the AB 52 consultation process with the applicable Native American tribes. The specific information on tribal cultural resources in the discussion below is from these unless otherwise indicated. Due to the confidential nature of the TCR Report, it is not attached to this document and/or available for public review.

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

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

Less Than Significant Impact With Mitigation. On September 25, 2014, Governor Brown signed into law AB 52, which amended Public Resources Code Section 5097.94 and added Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to establish that an analysis of a project's impact on cultural resources include whether the project would impact "tribal cultural resources." As set forth in Public Resources Code Section 21074, tribal cultural resources are any of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(a) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(b) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.¹⁵⁸

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1.¹⁵⁹ In applying the criteria set forth in subdivision (c) of Section 5024.1

¹⁵⁸ Per subdivision (k) of Public Resources Code Section 5020.1, "local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

¹⁵⁹ Subdivision (c) of Public Resources Code Section 5024.1 provides the National Register of Historic Places criteria for listing of historical resources in the California Register.

for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

- (a) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.*
- (b) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2,¹⁶⁰ or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2¹⁶¹ may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).*

As set forth in Public Resources Code Section 21080.3.1, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report, the lead agency is required to consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of a proposed project, if: (1) the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area; and (2) the tribe requests consultation, prior to the release of a negative declaration, mitigated negative declaration or environmental impact report for a project.

The Project Site is located in the Santa Monica Mountains within the Brentwood–Pacific Palisades Community Plan area of the City. This area, along with the greater southern California region, has a history of Native American occupation. According to the Confidential TCR Report, the Project Site falls within the ethnographic area of the Gabrielino/Tongva and is just south of the ethnographic area of the Tataviam (see Figure 4 of the TCR Report). According to the ethnographic research conducted as part of the TCR Report, a Siutcabit village, which may represent prehistoric native American village site CA-LAN-43, is located approximately 2.3 miles northwest of the Project Site in Encino. The tribes of this area, which the TCR Report indicates arrived in the greater Los Angeles area and southern Antelope Valley around 500 B.C., have traditionally spoken Takic languages that may be assigned to the larger Uto–Aztecan family (although some scholars suggest that the Tataviam may have spoken a related but separate language (e.g., Tataviam Takic or a language that was uncommonly used in southern California). With regard specifically to the area of the Project Site, the TCR Report indicates that historic maps indicate that the Project Site is also located near historically mapped water sources, including the San Fernando Creek, Pacoima Creek, Little and Big Tujunga Washes, the Los Angeles River, and a few unnamed tributaries to the north, as well as an unnamed tributary located less than 500 feet south of the Project Site that follows the landscape of the Sepulveda Canyon. Additionally, the Project Site is located within foothill area, which may have provided Native Americans with valuable resources in both the prehistoric and protohistoric time period. The TCR Report, however, indicates that while there are some

¹⁶⁰ Per subdivision (g) of Public Resources Code Section 21083.2, a unique archaeological resource means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; or (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

¹⁶¹ Per subdivision (h) of Public Resources Code Section 21083.2, a nonunique archaeological resource means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.

characteristics that would have been of value for prehistoric use of this Project area, there are similar resources available throughout the region.

As previously discussed, the Project improvements are proposed largely within the existing development footprint of the school which has been previously graded and disturbed (such as the existing playfield where the new Learning Center building is proposed, the Library where the expansion of the second floor is proposed, and a portion of the existing parking lot located immediately west of the Project Site where most of the new storage/trash/recycling enclosure is proposed). Furthermore, the Project would require 1.45 acres of soil disturbance (see Figure 5 in the TCR Report, Area of Direct Impact), and the potential for uncovering tribal cultural resources during Project construction may be limited. In addition, fill material ranging between 7 and 34 feet bgs underlies the relatively flat terrace portion of the Project Site where the existing and most of the proposed Project improvements are proposed¹⁶², and this along with the past disturbance of the site lead the TCR Report to conclude that soils with the potential to support the presence of buried tribal cultural resources are unlikely to have persisted. Still, the Project would require grading and excavations of up to approximately 15 feet bgs, and cylindrical drilling for foundation caissons of up to 20 feet bgs, which would create some potential to encounter buried resources if present.¹⁶³

Also, the SCCIC and Native American Heritage Commission (NAHC) Sacred Lands File (SLF) records searches conducted for the Project (included as Appendices A and B, respectively, of the TCR Report) do not indicate the presence of tribal cultural on or within 0.5 mile of the Project Site. However, the NAHC states that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources.

Furthermore, the City of Los Angeles Department of City Planning, as lead agency for the Project, solicited requests for AB 52 consultation from the California Native American tribes that are traditionally or culturally affiliated with the geographic area in which the Project Site is located on October 21, 2019. Two requests for consultation were received by the City, one on November 1, 2019, from the Gabrieleño Band of Mission Indians–Kizh Nation, and one on November 15, 2020, from the Fernandeño Tataviam Band of Mission Indians (both included in Appendix C of the TCR Report). An AB 52 consultation meeting was held with the Fernandeño Tataviam Band of Mission Indians on June 25, 2020, and on February 2, 2021. An AB 52 consultation meeting was held with the Gabrieleño Band of Mission Indians–Kizh Nation on August 12, 2020, and confidential information was provided by the Tribe in an email dated August 24, 2020. To maintain confidentiality, that information is not included as an appendix to this document. At the consultation meetings, each tribe requested mitigations, which are included herein with some modification to the measures requested by the Gabrieleño Band of Mission Indians–Kizh Nation. Two versions of a Tribal Mitigation Measure, one undated and one dated July 2020, was requested by the Gabrieleño Band of Mission Indians–Kizh Nation; the version dated July 2020 has been utilized herein. Consultation was closed on November 9, 2021.

Therefore, given the past history of Native American occupation in the Los Angeles area and greater southern California region, as well as the input from the tribal representatives, it is concluded that Project

¹⁶² Geosyntec Consultants, Geotechnical Investigation for the Proposed Mirman School Learning Center, January 20, 2021. Included as Appendix 7 of this MND.

¹⁶³ Specifically, the Project's maximum excavation depths would be 13 feet bgs for the Learning Center and 15 feet bgs for the stormwater capture tank, with cylindrical drilling for caissons of 20 feet in length.

construction activities could potentially unearth or otherwise disturb buried tribal cultural resources. With mitigation, impacts to tribal cultural resources would be less than significant.

Mitigation Measure TCR-1: Prior to commencing any ground disturbance activities at the Project Site, the Applicant, or its successor, shall retain archeological monitors and tribal monitors that are qualified to identify subsurface tribal cultural resources. Ground-disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the Project Site. Any qualified tribal monitor(s) shall be approved by the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeño Tataviam Band of Mission Indians.

Any qualified archaeological monitor(s) shall be approved by the Department of City Planning, Office of Historic Resources (“OHR”).

The qualified archeological and tribal monitors shall observe all ground disturbance activities on the Project Site at all times the ground disturbance activities are taking place. If ground disturbance activities are simultaneously occurring at multiple locations on the Project Site, an archeological and tribal monitor shall be assigned to each location where the ground disturbance activities are occurring. The on-site monitoring shall end when the ground disturbing activities are completed, or when the archaeological and tribal monitor both indicate that the site has a low potential for impacting tribal cultural resources.

Prior to commencing any ground disturbance activities, the archaeological monitor in consultation with the tribal monitor, shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground disturbance activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground disturbance activities. In addition, workers will be shown examples of the types of resources that would require notification of the archaeological monitor and tribal monitor. The Applicant shall maintain on the Project Site, for City inspection, documentation establishing the training was completed for all members of the construction crew involved in ground disturbance activities.

In the event that any subsurface objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease within the area of discovery, the radius of which shall be determined by a qualified archeologist, in consultation with a qualified tribal monitor, until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

1. Upon a discovery of a potential tribal cultural resource, the Applicant, or its successor, shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and OHR.
2. If OHR determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be a tribal cultural resource in its discretion and supported by substantial evidence, the City shall provide any affected Tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Applicant, or its successor, and the City

regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

3. The Applicant, or its successor, shall implement the Tribe's recommendations if a qualified archaeologist retained by the City and paid for by the Applicant, or its successor, in consultation with the tribal monitor, reasonably conclude that the Tribe's recommendations are reasonable and feasible.
4. In addition to any recommendations from the applicable Tribe(s), a qualified archeologist shall develop a list of actions that shall be taken to avoid or minimize impacts to the identified tribal cultural resources substantially consistent with best practices identified by the Native American Heritage Commission and in compliance with any applicable federal, state or local law, rule or regulation.
5. If the Applicant, or its successor, does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or qualified tribal monitor, the Applicant, or its successor, may request mediation by a mediator agreed to by the Applicant, or its successor, and the City. The mediator must have the requisite professional qualifications and experience to mediate such a dispute. The City shall make the determination as to whether the mediator is at least minimally qualified to mediate the dispute. After making a reasonable effort to mediate this particular dispute, the City may: (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources. The Applicant, or its successor, shall pay all costs and fees associated with the mediation.
6. The Applicant, or its successor, may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
7. The Applicant, or its successor, may recommence ground disturbance activities inside of the specified radius of the discovery site only after it has complied with all of the recommendations developed and approved pursuant to the process set forth in paragraphs 2 through 5 above.
8. Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton and to the Native American Heritage Commission for inclusion in its Sacred Lands File.
9. Notwithstanding paragraph 8 above, any information that the Department of City Planning, in consultation with the City Attorney's Office, determines to be confidential in nature shall be excluded from submission to the SCCIC or provided to the public under the applicable provisions of the California Public Records Act, California Public Resources Code, section 6254(r), and handled in compliance with the City's AB 52 Confidentiality Protocols.

Mitigation Measure TCR-2: Prior to the commencement of any ground disturbing activity at the Project Site, the project applicant shall retain a Native American Monitor approved by the Gabrieleño Band of Mission Indians—Kizh Nation—the Tribe that consulted on this project, pursuant to AB 52 and SB 18 (the “Tribe” or the “Consulting Tribe”). A copy of the executed contract shall be submitted to the Lead Agency prior to the issuance of any permit necessary to commence a ground-disturbing activity. The tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground-disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The tribal monitor will complete daily monitoring logs that will provide descriptions of the day’s activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the tribal representatives and tribal monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting tribal cultural resources. Upon discovery of any tribal cultural resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All tribal cultural resources unearthed by project activities shall be evaluated by the tribal monitor approved by the Consulting Tribe and a qualified archaeologist if one is present. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes. If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue in other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

Mitigation Measure TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary Objects. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC and PRC 5097.98 shall be followed.

Mitigation Measure TCR-4: Resource Assessment and Continuation of Work Protocol. Upon discovery of human remains, the tribal and/or archaeological monitor/

consultant/consultant will immediately divert work at minimum of 100 feet and place an exclusion zone around the discovery location. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are human and subsequently Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

Mitigation Measure TCR-5: Kizh–Gabrieleño Procedures for burials and funerary remains.

If the Gabrieleño Band of Mission Indians–Kizh Nation is designated MLD, the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, tribal traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Mitigation Measure TCR-6: Treatment Measures. Prior to the continuation of ground disturbing activities, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on-site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the Project Site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Mitigation Measure TCR-7: Professional Standards. Native American and Archaeological monitoring during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of TCR's shall be taken. The Native American monitor must be approved by the Gabrieleño Band of Mission Indians–Kizh Nation. Principal personnel for Archaeology must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California.

Mitigation Measure TCR-8: In the event that tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, and a qualified archaeologist meeting Secretary of Interior standards shall assess the find. The applicant or Project manager shall contact the Fernandeano Tataviam Band of Mission Indians (FTBMI) and consulting Tribes under AB 52 to consult if any such find occurs. The archaeologist shall complete all relevant California State Department of Parks and Recreation (DPR) 523 Series forms to document the find and submit this documentation to the applicant, Lead Agency, FTBMI.

Mitigation Measure TCR-9: Should tribal cultural resources be encountered during Project implementation, the Project Applicant shall retain a professional Native American monitor from the Fernandeano Tataviam Band of Mission Indians or consulting Tribes under AB 52 to observe all clearing, grubbing, and grading operations up to 5 feet below the surface of native soil, unless there is evidence to suggest cultural resources extend below the specified depth.

Mitigation Measure TCR-10: The Lead Agency and/or applicant shall, in good faith, consult with Tribes that requested consultation under AB 52 on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities.

Mitigation Measure TCR-11: If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County coroner shall be contacted. If the human remains are determined to be Native American in origin by the County coroner, the applicant shall immediately notify the Lead Agency, the Fernandeano Tataviam Band of Mission Indians, and consulting Tribes.

Mitigation Measure TCR-12: Tribal Cultural Resource Inadvertent Discovery. In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the Project Site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American Tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project, including the Gabrieleño Band of Mission Indians–Kizh Nation and the Fernandeano Tataviam Band of Mission Indians; (2) and the Department of City Planning at (818) 260-8163.
- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City

shall provide any affected Tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Applicant shall implement the Tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the Tribe's recommendations are reasonable and feasible.
- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any affected Tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.
- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.
- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.
- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Mitigation Measure TCR-13: Human Remains Inadvertent Discovery. In the event that human skeletal remains are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5 which requires that no further ground disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to California Public Resources Code Section 5097.98. In the event human skeletal remains are discovered during construction or during any ground disturbance activities, the following procedures shall be followed:

- 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)
If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the Applicant, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the Applicant does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Mitigation Measure TCR-14: Archaeological Resources Inadvertent Discovery. In the event that any subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, pursuant to State Health and Safety Code Section 7050.5, at which time the applicant shall notify the City and consult with a qualified archaeologist who shall evaluate the find in accordance with Federal, State, and local guidelines, including those set forth in the California Public Resources Code Section 21083.2 and shall determine the necessary findings as to the origin and disposition to assess the significance of the find. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

Mitigation Measure TCR-15: Paleontological Resources Inadvertent Discovery. In the event that any prehistoric subsurface cultural resources are encountered at the Project Site during construction or the course of any ground disturbance activities, all such activities shall halt immediately, at which time the applicant shall notify the City and consult with a qualified paleontologist to assess the significance of the find. In the case of discovery of paleontological resources, the assessment shall be done in accordance with the Society of Vertebrate Paleontology standards. If any find is determined to be significant, appropriate avoidance measures recommended by the consultant and approved by the City must be followed unless avoidance is determined to be unnecessary or infeasible by the City. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., data recovery, excavation) shall be instituted.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

The following analysis is based, in part, on the Mirman School for Gifted Children: Utility Technical Report: Water, Wastewater, and Energy (Utility Report) and Water Resources Technical Report (Water Resources Report). These reports, both prepared by KPFF Consulting Engineers, with the Water Resources Report dated July 2021 and the Utility Report also dated July 2021, are included as Appendices 12 and 16, respectively, of this MND. The following information and analysis is based on these reports unless otherwise indicated.

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

Less Than Significant Impact. Water and electrical service to the Project Site is provided by the Los Angeles Department of Water and Power (LADWP), sewer service is provided by LA Sanitation & Environment (LASAN), stormwater drainage is overseen by the LADWP, and natural gas service is provided by SoCalGas. These services are provided by existing water, sewer, electrical, natural gas and telecommunications infrastructure currently extending to the Project Site from existing mains and distribution lines within the Mulholland Drive right-of-way, and by existing on-site storm drainage infrastructure.

Water

As indicated in Table 27, Mirman School currently generates a demand for an estimated 3,515 gallons per day (gpd) of domestic (potable) water and would generate a demand for an estimated 4,415 gpd of domestic water under the Project, for a net increase of 900 gpd. Two LADWP water mains occur in the Mulholland Drive right-of-way adjacent to the Project Site, including a 16-inch main and an 8-inch main. Domestic water for the School is currently provided by LADWP's existing 8-inch water main in Mulholland Drive and an existing 3-inch water service connection from this line to the School's on-site water distribution system.

Under the Project, the existing 3-inch service would continue to be utilized along with: (1) a new 8-inch fire service from the 8-inch Mulholland main that would supply the proposed fire sprinkler suppression system in the proposed Learning Center; and (2) a new 3-inch water service from the 8-inch Mulholland main that would supply domestic water to the Learning Center. Fire flow would be provided by up to six of the existing fire hydrants in the immediate vicinity of the Project Site, including two within the Mulholland Drive right-of-way adjacent to the Project Site, two along the Berkeley Hall School driveway, and two on-site. Improvements required to the on-site distribution system to serve the proposed school facilities would be designed and installed in consultation with LADWP and LADBS and would meet all applicable City requirements.

Construction

During the approximately 14-month Project construction period, water would be required intermittently for dust control, equipment cleaning, and soil grading and preparation during the early construction phases, with this water anticipated to come from the existing public off-site and private on-site fire hydrants and/or the existing on-site domestic water infrastructure. Due to the small scale of construction, the construction activities would be limited with the bulk of the water use occurring during grading.¹⁶⁴ Later phases of construction normally require less water usage. Furthermore, any work that could potentially affect existing water service and infrastructure would be coordinated with LADWP so as to avoid damage to existing infrastructure and interruption of service. Lastly, anticipated water usage during construction would be temporary and would be expected to be less than the amount of domestic water used during Project operation and substantially less than Project fire flow requirements (which would not require major infrastructure upgrades as discussed under "Operation" below). Therefore, Project construction impacts on the local public water system would be less than significant.

As part of the Project, construction of enhancements to the existing on-site water distribution system would be required. This would require on-site trenching and trenching within the existing parking lot located between the Project Site and Mulholland Drive. The environmental effects associated with the construction of this infrastructure and associated trenching would be minimal owing to the minimal amount of new development being proposed. Furthermore, the impacts of the on-site trenching is subsumed in the impact analysis for the Project in other sections of this MND (e.g., Air Quality, Noise, etc.). Also, any potential for impacts to vehicular and pedestrian circulation and access associated with trenching would be mitigated with implementation of the required Construction Traffic Mitigation Plan discussed in Checklist Section XVII, Transportation, of this MND.

¹⁶⁴ The Project would include only 22,508 sf of new floor area 12,600 cy of grading, and 1.45 acres of soil disturbance.

Table 27
Project Operational Water Demand

Use	Size	Water Demand Factor ^{a,b} (gpd/unit)	Average Daily Water Demand (gpd)
Existing			
Students	330 stu	9/stu	2,970
Irrigation	—	—	545 ^c
Total Existing			3,515
Project			
Students	100 stu	9/stu	900
Irrigation	—	—	0 ^d
Total Project (e.g., net increase)			900
Total (Existing + Project)			4,415
gpd = gallons per day sf = square feet stu = students ^a The average daily flow based on 100% of City of Los Angeles (LASAN) sewage generation factors ^b Per LASAN, this sewage generation factor for Elementary/Jr. High School students accounts for associated: classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses, and storage areas, auditoriums and gymnasiums. ^c Landscape water demand was based on the methodology outlined in the State's Model Water Efficiency Landscape ordinance by taking the total square footage of landscape for the Project Site with the assumption of a 0.8 plant factor intended for turf. ^d The Project would result in a small net decrease in landscape area, and new landscaped area would be planted with low water use plants (Plant factor = 4.0) which would require less irrigation than the existing turf. In compliance with City of Los Angeles LID requirements the Project would also implement a Capture and Use system to use captured stormwater for irrigation. Post-construction irrigation water demand is conservatively assumed to be the same the existing landscape irrigation demand. Source: KPFF Consulting Engineers, Mirman School for Gifted Children Utility Technical Report: Water, Wastewater, and Energy, July 2021.			

No upgrades to the off-site water infrastructure are anticipated. Therefore, the environmental effects associated with the construction of the required water infrastructure improvements would be less than significant.

Operation

When analyzing the Project for infrastructure capacity, the projected demands for domestic and fire suppression water are considered. Although domestic water demand is the Project's main contributor to water demand, fire flow demands have a much greater instantaneous impact on infrastructure and therefore are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analyses for domestic and fire suppression water flows have been completed by LADWP in the form of a Service Advisory Request (SAR) and Information of Fire Flow Availability Report (IFFAR). The SAR and IFFAR are include as Exhibits 4 and 1, respectively, of the Utility Report.

As indicated previously, the Project would obtain its operational domestic water supply from the existing LADWP 8-inch water main in Mulholland Drive via the existing 3-inch water service, a proposed new 8-inch fire service, and a proposed new 3-inch water service. These infrastructure improvements would be constructed in coordination with LADBS and LADWP, and in accordance with all City requirements. The approved SAR for the Project indicates that the static pressure of the proposed new 8-inch and 3-inch services combined would be 135 psi, that the maximum combined pressure of these services would be 2,500 gpm at 100 psi, and that adequate capacity exists in the local public water system to serve the Project.

Article 7 Fire Protection and Prevention, Section 57.507 of the LAMC sets the fire flow requirements for the Project which is sourced from the local fire hydrants (as opposed to from the local domestic water system discussed above). These guidelines prescribe the fire flow requirements (pressure and duration) and hydrant spacing requirements for the Project. Based on the fire flow standards set forth in Section 57.507.3 of the LAMC and email correspondence with the Fire Department, the Project falls within the High Density Residential and Neighborhood Commercial category which has a required fire flow of 4,000 gallons per minute (gpm) from four adjacent fire hydrants flowing simultaneously. Additionally, the minimum residual water pressure of 20 pounds per square inch (psi) must remain in the system (while the 4,000 gpm flow is occurring). There are 4 existing hydrants in the Project Site vicinity; two public hydrants along Mulholland Drive (once each supplied by the existing 8-inch and 16-inch water mains in Mulholland) and two on-site private hydrants. An IFFAR was submitted to LADWP to verify available fire hydrant flow compliance. The completed IFFAR, Exhibit 1 of the Utility Report, shows that the two existing public fire hydrants flowing simultaneously have a combined flow of 2,750 gpm at or above 20 psi. Hence, fire flow from the existing two private on-site fire hydrants is required to supplement the flow from the two public fire hydrants to meet the fire flow requirements for the Project. As LADWP only provides information for the public water system, the data from the IFFAR and the SAR was used to generate a fire flow model for the Project. Results from this analysis are found in Exhibit 5 of the Utility Report. The model shows that the existing system of public and private hydrants and fire water mains can supply 4,000 from 4 hydrants while maintaining the required minimum residual water pressure of 20 psi. Therefore, adequate fire flow is available to serve the Project. Furthermore, should an additional hydrant be required as design progresses, the Project team would work with LAFD and LADWP to locate and provide water service to the hydrant. Based on information available in the IFFAR and SAR, it is reasonable to assume that installation of an additional hydrant would result in a less than significant impact to water facilities in Mulholland Drive and less than significant environmental effects.

Based on the above, the existing local public water system has adequate capacity to serve the Project, and no upgrades to public water mains are anticipated. Therefore, Project operational impacts on the local public water system would be less than significant, and no mitigation measures are required.

Wastewater

As indicated in Table 28, Mirman School currently generates an estimated 2,970 gpd of wastewater and would generate an estimated 3,870 gpd of wastewater under the Project, for a net increase of 900 gpd. Sewer service would continue to be provided under the Project by the existing LASAN 8-inch sewer main through private on-site sewers including a collection system made up of 1-inch and 2-inch sewers and a 4-inch lateral that increases to a 6-inch lateral before connecting to the existing

Table 28
Project Operational Wastewater Generation

Use	Size	Wastewater Generation Factor ^{a,b} (gpd/unit)	Average Daily Wastewater Generation (gpd)
Existing			
Students	330 students	9/student	2,970
Total Existing			2,970
Project			
Students	100 students	9/student	900
Total Project			900
Total (Existing + Project)			3,870
<i>gpd = gallons per day</i> <i>sf = square feet</i> ^a <i>The average daily flow based on 100 percent of City of Los Angeles (LASAN) sewage generation factors.</i> ^b <i>Per LASAN, this sewage generation factor for Elementary/Jr. High School students accounts for associated: classrooms, lecture halls, professor's offices, administration offices, laboratories for classes or research, libraries, bookstores, student/professor lounges, school cafeterias, warehouses, and storage areas, auditoriums and gymnasiums.</i> <i>Source: KPFF Consulting Engineers, Mirman School for Gifted Children Utility Technical Report: Water, Wastewater, and Energy, July 2021. Based on LASAN's June 14, 2021, WWSI included as Exhibit 2 of the Utility Report.</i>			

small on-site lift station and then the Mulholland sewer main.¹⁶⁵ Improvements required to the existing on-site collection system to serve the proposed school facilities would be designed and installed in consultation with LASAN and would meet all applicable City requirements.

Construction

During the construction period, wastewater would be generated by Project construction workers. This wastewater generation would be temporarily, lasting only as long as construction activities occur, and would also be very limited owing to the small scale of the Project and required construction activities.¹⁶⁶ In addition, it is anticipated that the majority of the construction workers would be served by portable toilets rather than the school's existing bathroom facilities, and that the wastewater from the portable toilets would be removed by a licensed service rather than require accommodation by the existing local public sewer system. Furthermore, any work that could potentially affect existing sewer service and infrastructure would be coordinated with LASAN so as to avoid damage to existing infrastructure and interruption of service. Lastly, the amount of wastewater associated with the construction workers would be anticipated to be less than that created during operation of the proposed Project (which would not

¹⁶⁵ The small on-site lift station referenced here and in the Utility Report and the on-site sewage holding tanks referenced in the Phase I ESA are one-in-the-same.

¹⁶⁶ The Project would include only 22,508 sf of new floor area and 1.45 acres of soil disturbance.

require major infrastructure upgrades as discussed under “Operation” below). Therefore, Project construction impacts on the local public sewer system would be less than significant.

As part of the proposed development of the Project, construction of enhancements to the existing on-site wastewater collection system would be required. This would require on-site trenching. The environmental effects associated with the construction of this infrastructure and associated trenching would be minimal owing to the minimal amount of new development being proposed. Furthermore, the impacts of much of the on-site trenching is subsumed in the impact analysis for the Project in other sections of this MND (e.g., Air Quality, Noise, etc.). Also, any potential for impacts to vehicular and pedestrian circulation and access associated with trenching would be mitigated with implementation of the required Construction Traffic Mitigation Plan discussed in Checklist Section XVII, Transportation, of this MND. No upgrades to the off-site wastewater infrastructure are anticipated. Therefore, the environmental effects associated with the construction of the required wastewater infrastructure improvements would be less than significant.

Operation

Whether the capacity of the existing 8-inch Mulholland Drive sewer main has adequate capacity to serve the Project was evaluated by comparing the estimated Project wastewater generation with the calculated available capacity of the sewer main. LASAN carried out this analysis through the preparation of a Request for Wastewater Services Information (WWSI) included as Exhibit 2 of the Utility Report. LASAN's approach consisted of the study of a worst-case scenario envisioning peak demand from the relevant facilities occurring simultaneously on the wastewater system. A combination of flow gauging data and computed results from the City's hydrodynamic model were used to project current and future impacts due to additional sewer discharge. The WWSI concludes that adequate capacity is available in the local LASAN sewer system to accommodate a net increase of 900 gpd of wastewater from the Project. As the net increase in wastewater generation under the Project would be 900 gpd, adequate capacity exists in the local public sewer system to serve the Project, and no upgrades to the existing off-site sewer lines are required.

The Project Site is located within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. Wastewater generated by the Project would be conveyed via the Hyperion Sanitary Sewer System for treatment at the Hyperion Water Reclamation Plant. The Hyperion Water Reclamation Plant has a capacity of 450 million gallons per day and current wastewater flow levels are at 275 million gallons per day.¹⁶⁷ Accordingly, the remaining available capacity at the Hyperion Water Reclamation Plant is 175 million gallons per day. Thus, the Project's net increase in average daily wastewater flows of approximately 0.0009 million gallons per day would represent approximately 0.0005 percent of the remaining available capacity of the Hyperion Water Reclamation Plant. Therefore, adequate wastewater treatment capacity is available to serve the Project.

Based on the above, the existing local public sewer and wastewater treatment systems have adequate capacity to serve the Project. Therefore, Project operational impacts on the local public sewer and wastewater treatment systems would be less than significant

¹⁶⁷ LASAN, Hyperion Water Reclamation Plant, www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=grj40dmqj_1780&_afLoop=3950078628628745#!, accessed June 6, 2020.

Stormwater

As previously discussed, the majority of the Project Site would remain as pervious surfaces with implementation of the Project. In addition, the existing drainage pattern would be retained under the Project, with the stormwater from the northern portion of the site continuing to drain to an existing 18-inch City storm drain in Mulholland Drive and stormwater from the southern portion of the site continuing to drain to a 54-inch City storm drain at the low point of the existing on-site fire access lane, and the Project would retain this existing drainage pattern. Furthermore, the Project has been designed to minimize the extent of non-permeable surfaces, including through the development of a two- rather than a one-story Learning Center building development of the Library expansion on the second floor of the Library, development of the proposed storage/trash/recycling enclosure largely within the Westland School/Bel Air Presbyterian Church parking lot, and the proposed new courtyard and landscaped areas. Also, the Project would only expand the existing on-site portion of the drainage infrastructure to serve the proposed improvements—no improvements to the off-site storm drain system would be required. Lastly, while minor on-site trenching would be required for the on-site storm drains, the environmental effects of this trenching (e.g., air quality, noise, etc.) is subsumed in the impact analysis in the balance of this MND. Therefore, the Project would not necessitate the construction of new stormwater drainage facilities or the expansion of existing facilities, the construction or relocation of which could cause significant environmental effects, and impacts would be less than significant. See Checklist Section X, Hydrology and Water Quality, of this MND for further discussion.

Electricity

There are two 4-inch underground LADWP power lines within the Mulholland Drive right-of-way adjacent to the Project Site. There is also a 1,500 kilovolt-amperes (kVA) pad mounted transformer providing 480/277V, 200A, 3-phase service located in the northern portion of the Project Site that recently replaced a smaller 300 kVA transformer at the same location. The transformer connects to one of the two underground Mulholland Drive power lines, and on-site distribution lines between the transformer and the on-site uses.

Electrical power would be consumed during construction of the proposed school facilities, including for construction lighting, equipment, power tools, and construction trailers. The demand would be supplied from existing electrical services within the Project Site and/or construction generators. Additionally, the electrical demand from demolition and construction activities would be expected to be less than what would be consumed when the completed new building and expansion of the existing buildings are occupied discussed below (which can be adequately provided by one of the existing 4-inch underground power line in Mulholland Drive). Lastly, construction electricity use would be temporary. Overall, Project construction activities would not be expected to have any adverse impact on electricity infrastructure, and the impact would be less than significant.

As part of the proposed development, extension of the on-site electricity distribution system would be required which would require some trenching on-site (through existing hardscape areas and utility corridors). No upgrades to the existing off-site electrical infrastructure are anticipated. For the same reasons discussed above for water and wastewater, the environmental effects associated with the construction of this electrical infrastructure would be less than significant.

The Project would generate a net increase in electricity demand of approximately 277 kVA, for a total (existing of 407 kVA plus proposed) of 684 kVA. This electricity infrastructure capacity would be met

through the existing transformer, which the Utility Report concludes has adequate capacity to serve the Project, and the provision of upgraded electrical service. According to the LADWP Will Serve Letter for the Project, included as Exhibit 3 of the Utility Report: (1) electric service is available and would be provided in accordance with LADWP regulations; and (2) the estimated power requirement for this project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the power system. Based on the above, adequate electrical infrastructure capacity is available to serve the Project, and the impact would be less than significant. For a discussion of impacts to electricity supplies, see Checklist Section VI, Energy, of this MND.

Natural Gas

Based on available substructure maps, there are several SoCal-Gas mains located within the Project Site vicinity, including a 8.5-inch gas main within Mulholland Drive 75 feet north of the property line, and two 2-inch gas lines from this gas main servicing the property. Although natural gas is available at the Project Site, natural gas use at the site is restricted to heating of the school buildings, cooking in the cafeteria, and hot water.

The Project would include a 22,508 square foot increase in floor area. However, there would be no net increase in natural gas usage at the School under the Project. Therefore, no impacts associated with natural gas infrastructure would occur.

Telecommunications

The Project would require construction of new on-site telecommunications infrastructure to serve the proposed Learning Center building and potentially modification of some of the existing on-site telecommunication infrastructure. Off-site work would be limited to connecting the infrastructure to the existing telecommunication lines and would be minor—no upgrades to the off-site telecommunications systems are anticipated. For the same reasons discussed under water and wastewater infrastructure, the environmental effects associated with the construction of needed telecommunications infrastructure would be less than significant.

Conclusion

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

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

Less Than Significant Impact. Water is provided to the Project Site by LADWP, with LADWP's primary water sources including the Los Angeles Aqueduct, local groundwater, purchases from the Metropolitan Water District (MWD), and recycled water. LADWP's 2015 Urban Water Management Plan (UWMP)

anticipates adequate water supplies would be available to serve its service area under normal, single-dry, and multi-dry year conditions through 2040.¹⁶⁸ Consistent with LADWP's methodology, the analysis of the Project's impacts relative to water supply is based on a calculation of the Project's water demand by applying the City's LASAN wastewater generation rates to the proposed uses. Accordingly, as shown in Table 27, Mirman school currently generates an average daily water demand of 3,515 gpd and would generate a total average daily water demand under the Project of 4,415 gpd, for a net increase of 900 gpd. This estimate is conservative because it does not take into account required water conservation features/measures required by Title 24 and the City of Los Angeles Green Building Code and Plumbing Code.

The City of Los Angeles' 2015 Urban Water Management Plan (UWMP) estimates a water demand of 475 million gallons per day within the LADWP service area in year 2025 (the year in which full enrollment of the Project's 100 net increase in students is anticipated), which means that the Project would account for less than 0.0002 percent of the total daily LADWP water demand in 2025. Furthermore, according to the LADWP's 2015 UWMP, LADWP would be able to meet the water demand within its service area during average year, single-dry year, and multiple-dry year through the year 2040.¹⁶⁹ Therefore, the Project would not be anticipated to require new or expanded water entitlements, especially as the Project would be consistent with the existing zoning of the Project Site which has been used by LADWP in projecting and planning for future water demand. As such, impacts associated with the availability of local or regional water supplies would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As discussed under Checklist Question XIX.a above, the Hyperion Water Reclamation Plant has a remaining available capacity of 175 million gallons per day. The Project's net increase in average daily wastewater flows of approximately 0.0009 million gallons per day would represent approximately 0.0005 percent of the remaining available capacity of the Hyperion Water Reclamation Plant. Furthermore, the LASAN WWSI confirms that the Hyperion Water Reclamation Plant has sufficient capacity and regulatory allotment for the Project. Therefore, based on the amount of wastewater expected to be generated by the Project and future wastewater treatment capacity, adequate wastewater treatment capacity would be available to serve the Project Site together with projected future demand and existing commitments. As such, impacts on the wastewater treatment provider would be less than significant impact, and no mitigation measures are required.

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

Less Than Significant Impact. While the LASAN generally provides waste collection services to single-family and some small multi-family developments, private haulers permitted by the City provide waste collection services for most multi-family residential, commercial and institutional developments within the City. Solid waste transported by both public and private haulers is either recycled, reused, or

¹⁶⁸ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

¹⁶⁹ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

transformed at a waste-to-energy facility, or disposed of at a landfill. Landfills within the Los Angeles County are categorized as either Class III (e.g., landfills permitted to accept non-hazardous and non-designated solid waste) or inert waste landfills. Non-hazardous municipal solid waste is disposed of in Class III landfills, while inert waste such as construction waste, yard trimmings, and earth-like waste are disposed of in inert waste landfills.¹⁷⁰ Ten Class III landfills and one inert landfill are currently operating within the County.¹⁷¹ In addition, there are two solid waste transformation facilities in the County that convert, combust, or otherwise process solid waste for the purpose of energy recovery. In 2018, the City of Los Angeles disposed of approximately 2.41 million tons of solid waste at the County's Class III landfills and approximately 11,684 tons at transformation facilities.^{172,173} The 2.41 million tons of solid waste accounts for approximately 2.91 percent of the total remaining capacity (82.74 million tons) for the County's Class III landfills open to the City as of December 31, 2017 (the latest date for which information is available).^{174,175} The permitted inert waste landfill serving the County is Azusa Land Reclamation. This facility currently has 55.71 million tons of remaining capacity and an average daily in-County disposal rate of 1,057 tons per day.¹⁷⁶

Los Angeles County continually evaluates landfill disposal needs and capacity through preparation of the Los Angeles County Countywide Integrated Waste Management Plan (ColWMP) Annual Reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. Based on the most recent (e.g., 2018) ColWMP Annual Report (published in December 2019), the most recent report available, the remaining total disposal capacity for the County's Class III landfills is estimated at 167.58 million tons.¹⁷⁷ Based on the 2017 ColWMP Annual Report, the countywide cumulative need for Class III landfill disposal capacity through the year 2032 will not exceed the 2017 remaining permitted Class III landfill capacity of 167.58 million tons (e.g., more than adequate disposal capacity is available through the 15-year planning horizon of the ColWMP 2017 Annual Report).¹⁷⁸

¹⁷⁰ Inert waste is waste which is neither chemically or biologically reactive and will not decompose. Examples of this are sand and concrete.

¹⁷¹ County of Los Angeles, Department of Public Works, Los Angeles County Integrated Waste Management Plan 2017 Annual Report, published April 2019. The 10 Class III landfills within the County include the Antelope Valley Landfill, Burbank Landfill, Calabasas Landfill, Chiquita Canyon Landfill, Lancaster Landfill, Pebbly Beach Landfill, San Clemente Landfill, Savage Canyon Landfill, Scholl Canyon Landfill, and Sunshine Canyon City/County Landfill. Azusa Land Reclamation is the only permitted Inert Waste Landfill in the County that has a full solid waste facility permit.

¹⁷² These numbers represent waste disposal, not generation, and thus do not reflect the amount of solid waste that was diverted via source reduction and recycling programs within the City.

¹⁷³ County of Los Angeles, Department of Public Works, Solid Waste Information System, Detailed Solid Waste Disposal Activity Report By Jurisdictions, City of Los Angeles (Reporting Period: January 2018 through December 2018), <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>, accessed January 2, 2019.

¹⁷⁴ $(2.41 \text{ million tons} \div 82.74 \text{ million tons}) \times 100 = 2.91 \text{ percent}$.

¹⁷⁵ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, published April 2019, Appendix E-2 Table 1.

¹⁷⁶ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, published April 2019, Appendix E-2 Table 1.

¹⁷⁷ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, published April 2019, Appendix E-2 Table 1.

¹⁷⁸ County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2017 Annual Report, published April 2019, page 41.

The City of Los Angeles implements a number of source reduction and recycling programs such as curbside recycling, home composting demonstration programs, and construction and demolition debris recycling. The City is currently diverting 76 percent of its waste from landfills and has adopted the goal of achieving 90 percent diversion by 2025 and zero waste by 2030.¹⁷⁹

The following analysis quantifies the Project's construction and operation solid waste generation and evaluates associated impacts to landfill capacity and consistency with applicable solid waste reduction goals and regulations.

Construction

The Project Site is currently developed with 42,678 square feet of existing educational facility floor area, including, but not limited to, to existing academic buildings with classrooms, art classrooms, a library, offices, a physical education building, and restrooms, along with an outdoor amphitheater, outdoor pedestrian/landscape courtyards, a playfield, 46 surface parking spaces, three driveways off of Mulholland Drive, and a fire road. The proposed LLA also contains a portion of the parking lot owned by the Bel Air Presbyterian Church located west of the Mirman School campus. To provide for the proposed improvements, the Project would demolish the 2,328-square-foot outdoor amphitheater and approximately 18,423 square feet of existing pavement, renovate 2,649 square feet of the existing Library, and construct 22,508 square feet of new floor area.

Pursuant to the requirements of SB 1374,¹⁸⁰ the Project would implement a construction waste management plan to recycle and/or salvage a minimum of 75 percent of non-hazardous demolition and construction debris. Materials that could be recycled or salvaged include asphalt, glass, and concrete. Debris not recycled could be accepted at the inert waste landfill (Azusa Land Reclamation) within Los Angeles County and by the Class III landfills open to the City. As shown in Table 29, after accounting for mandatory recycling, the Project would result in approximately 414 tons of renovation, construction and demolition waste. Given the remaining permitted capacity of the Azusa Land Reclamation facility, which is approximately 55.71 million tons, as well as the remaining 82.74 million tons of capacity at the Class III landfills open to the City, the landfills serving the Project Site would have sufficient capacity to accommodate the Project's construction-related solid waste disposal needs.

¹⁷⁹ LA Sanitation, Recycling, www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=alxbkb91s_4&_afLoop=18850686489149411#!, accessed January 2, 2019.

¹⁸⁰ SB 1374 requires that jurisdictions include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Table 29
Project Construction-Related Solid Waste Generation

Building	Size (sf)	Generation Rate (lbs/sf) ^a	Total	
			(lbs) ^b	(tons) ^b
Construction Waste	22,508	3.89	87,556	44
Renovation Waste	2,649	3.89	10,305	5
Demolition Waste—Pavement	18,423	155.00	2,855,565	1,428
Demolition Waste—Amphitheater	2,328	155.00	360,840	180
Total			3,314,266	1,657
Total After 75-Percent Recycling			828,567	414
<i>lbs = pounds</i> <i>sf = square feet</i> <i>ton = 2,000 lbs.</i> ^a U.S. Environmental Protection Agency, Report No. EPA530-98-010, <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i>, June 1998, Table 4 and Table 6. Generation rates used in this analysis are based on an average of individual rates assigned to specific building types. ^b Numbers have been rounded to the nearest whole number. Source: Eyestone Environmental, August 2021. Based on square feet of proposed construction, renovation and demolition from Johnson Favaro, July 1, 2021.				

Operation

Based on the solid waste generation rates from CalRecycle of 0.007 pound per square foot (psf) per day for school uses and one pound per student per day, Mirman School currently generates approximately 590 pounds (0.30 ton) of solid waste per day when school is in session.^{181,182} As described in Section 3, Project Description, of this MND, the Project would increase floor area and students at the school to 65,186 square feet and 430 students, respectively. Hence, based on the above operational solid waste generation rate, the Project (existing plus proposed) would generate approximately 886 pounds (0.44 ton) of solid waste per day, or a net increase of 258 pounds (0.13 ton) per day. This would represent an increase of approximately 33.8 tons per year.¹⁸³ This, in turn, would represent approximately 0.0014 percent of the City's annual solid waste disposal and approximately 0.00004 percent of the remaining capacity for the County's Class III landfills open to the City of Los Angeles. The Project's estimated solid waste generation would therefore represent a nominal percentage of the remaining daily disposal capacity of the applicable landfills. This analysis is conservative because: (1) it assumes year-round schooling; (2) the waste generation factors used do not account for recycling or other waste diversion measures such as compliance with AB 341, which requires California commercial enterprises

¹⁸¹ CalRecycle. Estimated Solid Waste Generation Rates, www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed January 2, 2019.

¹⁸² As provided in Part 3: Project Description, of this MND, the campus currently includes approximately 42,678 square feet of school building floor area and 330 students.

¹⁸³ Assumes 260 school days per year (i.e., 52 weeks x 5 days per week). This is a conservative estimate since summer classes at Mirman School are attended by a reduced number of students and since it does not subtract out for holidays and the time during the summer when classes are not in session. Hence, the analysis assumes year-round schooling, but not schooling on weekends.

and public entities that generate four cubic yards or more per week of waste, and multi-family housing with five or more units, to adopt recycling practices; and (3) the analysis does not include implementation of the City's upcoming Zero Waste LA franchising system, which is expected to result in a reduction of landfill disposal Citywide with a goal of reaching a Citywide recycling rate of 90 percent by the year 2025.

Based on the above, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, the impact would be less than significant, and no mitigation measures are required.

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

No Impact. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939) which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate areas for the collection and loading of recyclable materials in development projects. Further, AB 341, which became effective on July 1, 2012, requires businesses and public facilities that generate four cubic yards or more of waste per week and multi-family dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce greenhouse gas emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. Additionally, in March 2006, the City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in “zero waste” by 2030. The “blueprint” of the plan builds on the key elements of existing reduction and recycling programs and infrastructure and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste¹⁸⁴ on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate solid waste storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687) through development of the proposed 1,370-square-foot storage/trash/recycling enclosure (or through development of the 245-square-foot storage/trash/recycling enclosure under the Alternative LLA Scenario), which requires that developments include a recycling area or room of specified size on the Project Site.¹⁸⁵ The Project would also promote compliance with AB 939, AB 341, AB 1826 and City waste diversion goals by providing clearly marked,

¹⁸⁴ Organic waste refers to food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

¹⁸⁵ Ordinance No. 171687 adopted by the Los Angeles City Council on August 6, 1997.

source sorted receptacles to facilitate recycling. Finally, Project construction and operation would comply with CALGreen, Los Angeles Green Building Code, and LEED Silver or equivalent green building standards, including provisions for the use of recycled building materials during construction and implementation of waste diversion, reuse and recycling measures during construction and operation. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, no impact would occur.

XX. WILDFIRE

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

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

Less Than Significant Impact. The City of Los Angeles' General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (including fires) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, or disaster routes, along with the location of selected emergency facilities. Exhibit H identifies the I-405 Freeway and Sepulveda Boulevard in the Project Site vicinity as designated evacuation routes, but not Mulholland Drive (Mulholland Drive is identified as a designated evacuation route only east of the I-405 Freeway).¹⁸⁶

¹⁸⁶ City of Los Angeles, Safety Element of the Los Angeles City General Plan, Exhibit H, November 26, 1996, p. 61.

The Project would not alter any designated evacuation routes. Furthermore, the majority of Project construction activities would be confined to the Project Site and would not occur along designated evacuation routes or impede access to other nearby uses. Emergency access to the Project Site during construction would be maintained via Mulholland Drive. Furthermore, the Project would implement a Construction Traffic Management Plan, as mitigated herein, to ensure adequate and safe access along Mulholland Drive, the Project Site, and adjacent properties is maintained during construction. The Project would also be required to comply with all City and state building, fire and safety codes, and with the standards of the City of Los Angeles Fire Department (LAFD) for emergency access. The Project also would not install barriers that would impede access to the Project Site and vicinity and the Project would not result in the temporary or permanent closure of Mulholland Drive or any other streets in the vicinity of the Project Site. Accordingly, the Project would not impair implementation of an adopted emergency response or evacuation plan. The impact would be less than significant, and no mitigation measures are required.

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

Less Than Significant with Mitigation. As indicated previously, the Project Site is located within a City-designated Hillside area, a City-designated Very High Fire Hazard Severity Zone, and the City-designated Mountain Fire District portion of the Selected Wildfire Hazard Area. All projects located within these areas must comply with the requirements for the Mountain Fire District, as outlined in Section 57.25.01 of the LAMC. These requirements include controls on the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. With adherence to these requirements, as well as mitigation measures recommended by LAFD in a letter dated February 26, 2018, which have been formulated to protect development against wildland fires in hillside areas, the Project would not exacerbate wildfire risks. The impact associated with wildland fires would be less than significant with mitigation and conditions pending Project approval.

Mitigation Measure WILDFIRE-1; Mitigation measures shall include, but not be limited to, use of the following as determined by the Los Angeles Fire Department:

- a. Boxed-in eaves.
- b. Single pane, double thickness (minimum 1/8" thickness) or insulated windows.
- c. Non-wood siding.
- d. Exposed wooden members shall be two inches nominal thickness.
- e. Noncombustible finishes.

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

Less Than Significant Impact. The Project Site is already developed with urban uses, and as indicated above in Checklist Section XIX, Utilities and Service Systems, is already served by existing fire hydrants which would be adequate to serve the proposed uses. Hence, an adequate emergency water source is already available. Also, any improvements to or maintenance of infrastructure required as part of the Project would occur largely within the existing school campus. Furthermore, the Project would comply with all applicable requirements, conditions of approval (pending approval by the appropriate decision

maker), and mitigation measures recommended herein, including City requirements related to developing within a City-designated Hillside Area, Very High Fire Hazard Severity Zone, and the Mountain Fire District, and these requirements have been formulated to avoid exacerbation of fire risks associated with development in these areas.

Based on the above, the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing wildland fire impacts to the environment. Hence, the impact would be less than significant, and no mitigation measures are required.

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

Less Than Significant Impact. As indicated previously, the Project Site is located within a City-designated Hillside area, a City-designated Very High Fire Hazard Severity Zone, and the City-designated Mountain Fire District portion of the Selected Wildfire Hazard Area. Existing slopes in the southeastern and eastern portions of the Project Site could be subject to fire-related de-vegetation which could potentially result in downslope flooding and slope instability during heavy rain events until the vegetation grows back.

However, the Project improvements would be located largely on the flat terrace within the existing development footprint of the school rather than on the hillsides, such that the topography of the site would not be substantially altered and the stability of the surrounding hillsides would not be compromised. A portion of the Project Site's slopes are located within a City-designated "Landslide Area" and a City-designated "Earthquake-Induced Landslide Area," as well as a State-designated "Zone of Required Investigation" for landslides.^{187,188,189} However: (1) these slopes are located approximately 300 feet east from the Project's proposed improvements; (2) retaining walls exist at the foot of slope of much of the slopes surrounding the terrace; (3) previous stability analysis of the slope reported safety factors in excess of 1.5 for static and 1.0 for pseudo static conditions, indicating the risk of seismically induced landslides to be low; (4) elements indicating potential slope instability were not observed surrounding the Project Site during a field survey conducted as part of the Geotechnical Investigation; and (5) the existing school facilities have been located at their current location for decades without any landslide-related damage. Furthermore, as set forth in the Addendum to the Geotechnical Investigation prepared for the Project, and as requested by LADBS, extensive slope stability analyses have been prepared for the Project, in compliance with all City and State-required criteria for assessing the potential for landsliding. As shown by the LADBS Preliminary Geotechnical Investigation Approval Letter included as Appendix 7.3 of this MND, LADBS concurs with the provided slope stability analyses and has determined that the construction of the Project would not be subject to hazards pertaining to seismically induced landslides.

¹⁸⁷ Los Angeles General Plan Safety Element, November 1996, Exhibit C, Landslide Inventory & Hillside Areas, adopted April, 1996.

¹⁸⁸ City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Reports for APNs 44990-001-006 and -016, and 4490-003-001, -002, -003 and -004, <http://ZIMAS.lacity.org/>, accessed January 2, 2019.

¹⁸⁹ State of California, California Geological Survey, Seismic Hazard Zones. Van Nuys Quadrangle, February 1, 1998.

For all these reasons, the potential for landslides affecting the Project is negligible.¹⁹⁰ Furthermore, all projects located within City-designated Hillside area, Very High Fire Hazard Severity Zone, and Mountain Fire District portion of the Selected Wildfire Hazard Area must comply with the requirements for the Mountain Fire District as outlined in Section 57.25.01 of the LAMC. These requirements include controls on the use and placement of construction materials, greenbelt requirements, the use of fire-resistant plants and materials, and the regular clearing of brush. Lastly, the Project would follow all LAMC and LADBS hillside development requirements. Therefore, with adherence to the above requirements which have been formulated to protect development against landslides, flooding, and wildland fires and their aftermath in hillside areas, and as mitigated elsewhere herein, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

¹⁹⁰ Geosyntec Consultants, Preliminary Geotechnical Investigation for the Proposed Mirman School Learning Center, January 20, 2021. Included as Appendix 7 of this MND.

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

Less Than Significant Impact. As analyzed above, the Project would not result in any significant, unmitigable environmental impacts that have the potential to substantially degrade the quality of environment, substantially reduce the habitat of a fish or wildlife species, etc., with implementation of the prescribed mitigation measures. For example, see Checklist Sections III, Air Quality; IV, Biological Resources; V, Cultural Resources; and XVIII, Tribal Cultural Resources. With implementation of the prescribed mitigation measures, all Project impacts would be reduced to less than significant levels.

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

Less Than Significant Impact. CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as “two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts.”¹⁹¹ This analysis of cumulative impacts need not be as in-depth as what is performed relative to the Project, but instead is to “be guided by the standards of practicality and reasonableness.”¹⁹²

As listed previously in Table 22, 16 related projects are identified within an approximately 2-mile radius of the Project Site. A map showing the locations of the related projects relative to the Project Site is included as Figure 1 of the Related Projects Technical Memorandum included in Appendix 14.3 of this MND. As shown therein, Related Project 1, the Curtis School located approximately 0.35 mile to the east of the Project Site on Mulholland Drive, is the nearest related project to the Project Site. Furthermore, a Prominent Ridge and the Milken Community Middle School are located between the Project Site and Related Project 1 such that direct line-of-sight between the two schools is unavailable. As the following analysis indicates, due to the distance of most of the related projects from the Project Site and physical conditions in the vicinity of the Project Site, the Project would not have impacts that are individually limited but cumulatively considerable with implementation of the mitigation measures previously identified for the Project in this MND. Therefore, cumulative impacts would be less than significant.

Aesthetics—Due to the presence of ridgelines in the southern and eastern portions of the Project Site, visibility of the Project Site from off-site public areas is limited. Additionally, the majority of the proposed Project improvements would be well set back from the property line and behind the existing school buildings as viewed from Mulholland Drive to the north Westland School to the west, and the residential subdivision even further to the west (across a parking lot and vacant lot). Even those proposed uses (e.g., entry pavilion and new playground with 6-foot-tall wall and 15-foot-tall shade structure) that would not be developed behind the existing school buildings would be partially shielded from view along Mulholland Drive by existing trees. Furthermore, as indicated in the related projects map (Figure 1 of the

¹⁹¹ State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.

¹⁹² Ibid, § 15355.

Related Projects Technical Memorandum included as Appendix 14.3 of this MND), none of the related projects are located in the immediate vicinity of the Project Site, nor do any of the related projects share direct line-of-site with the Project. As mitigated herein, the aesthetics impacts of the Project would not have the potential to combine with the aesthetics impacts of the related projects to result in cumulative aesthetics impacts. Moreover, like the Project, the related projects would be reviewed on a case-by-case basis by the City to comply with LAMC requirements regarding, building heights, setbacks, massing and lighting or, for those projects that require discretionary actions, to undergo site-specific review regarding building density, design, and light and glare effects. Lastly, with mitigation, the Project would result in less than significant aesthetics impacts, and thus would not contribute considerably to cumulative aesthetics impacts. For all these reasons, cumulative aesthetics impacts would be less than significant as mitigated herein.

Agriculture and Forestry Resources—As indicated in Checklist Section II, Agricultural and Forestry Resources, of this MND, the Project Site is developed with educational uses and no agricultural or forest uses exist within the Project Site or vicinity such that the Project would not convert agricultural or forestry resources to other uses. In addition, the Project Site and adjacent properties are not designated or zoned for agricultural or forestry use, nor are the Project Site and adjacent parcels subject to Williamson Act contracts. Furthermore, most if not all of the related projects do not propose converting agricultural or forestry resources to other uses. Therefore, the Project would not contribute considerably to cumulative agriculture and forestry resources impacts, and cumulative agriculture and forestry resources impacts would be less than significant.

Air Quality—According to SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (i.e., if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts, then the project would also result in a cumulatively considerable net increase). As indicated in Checklist Section III, Air Quality, of this MND, Project construction- and operations-related air quality impacts would be less than significant. Therefore, the Project would not contribute considerably to cumulative air quality impacts, and cumulative air quality impacts would be less than significant.

Biological Resources—Due to their site-specific nature, impacts on biological resources are typically assessed on a project-by-project basis. As indicated in Checklist Section IV, Biological Resources, of this MND, no special-status wildlife or fish species are considered to have a moderate or high potential for occurrence in the Project area. The Arborist Report (see Appendix 4) identifies one non-protected shamel ash tree that may be removed from the public right-of-way. As mitigated herein, the removal and replacement of any street trees are subject to review and approval by the Department of Urban Forestry, Board of Public Works. According to the Arborist Report, the proposed project will encroach upon nine of the 25 California sycamores planted in 2015-2016 subject to the review of Urban Forestry and the Board of Public Works as mitigated herein. Furthermore, tree protection measures for the eight protected trees on-site/adjacent to the Project site are recommended in the Arborist Report and are mitigated herein. The tree protection measures are subject to Urban Forestry and Board of Public Works review. The Project is also mitigated herein for the replacement of non-protected trees.

The Project would not conflict with the provisions of an HCP, Natural Community Conservation Plan or other such plan. Also, while there is the potential that migratory birds could nest in the on-site trees that would be removed under the Project, and while the Project would potentially remove one street tree, potentially impact roosting bats if present in the existing on-site buildings to be modified by the Project, and potentially indirectly impact any mountain lions that may transit the hillside portions of the Project Site

during nighttime hours, the Project would be subject to the requirements of the City's Protected Tree Ordinance, street tree regulations, the Migratory Bird Treaty Act, and other applicable biological resources regulations. Also, mitigation is identified in Checklist Section IV to reduce these potential impacts to less than significant levels. In addition, as with the Project, the related projects would be required to comply with the City's Protected Tree Ordinance, street tree regulations, the Migratory Bird Treaty Act, and other applicable biological resources regulations, as well as with CEQA for those projects subject to CEQA review. Thus, as the Project would not result in significant impacts to biological resources with mitigation incorporated, the Project would not contribute considerably to cumulative biological resources impacts. Furthermore, to the extent that the related projects would result in significant impacts to biological resources, they would also be required to implement mitigation to reduce/avoid the impacts. As such, cumulative biological resources impacts would be less than significant.

Cultural Resources—Cumulative impacts to historical resources would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As indicated in Checklist Section V, Cultural Resources, of this MND, the SCCIC records search conducted for the Project indicates that there are no listed historical resources or HCMs on or within the immediate vicinity of the Project Site. In addition, ZIMAS indicates that the Project Site is not located within a historic district. Furthermore, while the Project would expand the existing library, the library was constructed in 1981 and subsequently expanded in 2008, and the proposed construction of the new Learning Center building, security pavilion, storage/trash/recycling enclosure, playground, etc., would not involve the demolition or alteration of any existing campus buildings. Lastly, none of the Project Site buildings have been identified as potential historic resources on SurveyLA, the Citywide historic resources survey performed by the City's Office of Historic Resources. As such, the Project would not impact historical resources. Therefore, while one or more of the related projects could potentially affect historical resources, the Project would not contribute considerably to any such impacts. As such, cumulative historical resources impacts would be less than significant.

With regard to archaeological resources and human remains, the Project Site is located within a semi-urbanized area that has been disturbed and developed over time. As indicated in Checklist Section V, Cultural Resources, of this MND, the Project improvements would be developed largely within the existing development footprint of the school which has already been graded/disturbed and which is underlain by fill material such that the potential to encounter intact buried archaeological resources or human remains is low. Furthermore, the SCCIC records search conducted for the Project indicates that archaeological resources and human remains have not been previously documented on or within a 0.5-mile radius of the Project Site. Still, because of the history of Native American occupation of the greater Los Angeles area, and because the Project would include 1.45 acres of soil disturbance, 12,600 cy of grading, excavations up to 15 feet bgs, and cylindrical drilling of up to 20 feet bgs for caissons required for the Learning Center foundation, the Project analysis concludes that Project construction activities would nevertheless have some potential to encounter buried archaeological resources and/or human remains. However, with compliance with the City's standard Conditions of Approval regarding archaeological resources and human remains, which require consistency with CEQA Guidelines Section 15064.5, PRC Sections 5097.9 and 21083.2, and Health and Safety Code Section 7050.5, and as mitigated elsewhere herein (see Checklist Section XVIII, Tribal Cultural Impacts), Project impacts to archaeological resources and human remains would be less than significant. The related projects would similarly be subject to these conditions of approval. Therefore, the Project would not contribute considerably to cumulative impacts on archaeological resources and humane remains, and cumulative impacts to such resources would be less than significant.

Energy—As indicated in Checklist Section VI, Energy, of this MND, the Project would result in a less than significant impact on energy resources given its minimal size, the fact that it would adhere to all applicable energy conservation requirements (e.g., City's Green Building Ordinance, Title 24 energy efficiency standards, etc.), and because of the proposed sustainability features which include, but are not limited to: design and operation to meet LEED Silver or equivalent green building standards; use of Energy Star appliances; heat island reduction; optimized energy performance; retention of the 13 EVSE and three EV parking places; and provision of 36 additional short-term and four new long-term bicycle parking spaces. As with the Project, the related projects would be expected to implement energy conservation features to minimize the inefficient use of energy in accordance with applicable regulations, including the City's Green Building Ordinance and Title 24 energy efficiency standards. Therefore, the Project and the related projects would not result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Because of this, and because the Project would not contribute considerably to cumulative energy impacts, cumulative energy impacts would be less than significant.

Geology and Soils—Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis or for a particular localized area. Therefore, as with the Project, the related projects would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. Cumulative development would expose a greater number of people to seismic hazards. However, as with the Project, the related projects would be subject to local, State, and federal regulations and standards for seismic safety. Lastly, as indicated in Checklist Section VII, Geology and Soils, of this MND, the Project would result in less than significant geology and soils impacts (including impacts to paleontological resources) with mitigation incorporated. Therefore, the Project would not contribute considerably to cumulative geology and soils impacts, and cumulative geology and soils impacts would be less than significant.

Greenhouse Gas Emissions—The analysis of a project's GHG emissions is inherently a cumulative impacts analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the Project-level analysis in Checklist Section VIII, Greenhouse Gas Emission, of this MND took into account the potential for the Project to contribute to the cumulative impact of global climate change. As analyzed above, the Project's impacts regarding GHG emissions would be less than significant. As such, the Project would not contribute considerably to cumulative GHG impacts, and cumulative GHG impacts would be less than significant.

Hazards and Hazardous Materials—As with the Project, all related development located within the vicinity of the Project Site would be subject to local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Furthermore, none of the related projects are located closer than 0.35 mile from the Project Site such that it is not anticipated that any hazards and hazardous materials impacts associated with the related projects would combine with any such impacts of the Project to result in cumulative hazards and hazardous materials impacts. Lastly, as indicated in Checklist Section IX, Hazards and Hazardous Materials, of this MND, the Project would result in less than significant hazards and hazardous materials impacts with mitigation incorporated. Hence, the Project would not contribute considerably to cumulative hazards and hazardous materials impacts, and cumulative hazards and hazardous materials impacts would be less than significant.

Hydrology and Water Quality—The related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies and groundwater. However, as with the Project, the related projects would be subject to NPDES permit

requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre and compliance with local requirements pertaining to hydrology and surface water quality. It is anticipated that the related projects would be evaluated on an individual basis by the City during both site plan review and CEQA review (if applicable) to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Lastly, as indicated in Checklist Section X, Hydrology and Water Quality, of this MND, the Project would result in less than significant hydrology and water quality impacts owing to its minimal size, minimal net increase in peak hour stormwater runoff, proposed project design features, and because the Project would include the expansion of existing school uses rather than use types that could result in substantial polluted runoff (e.g., landfills, refineries, industrial uses, large parking lots, etc.). As also indicated in Checklist Section X, the Project is not proposed in a floodplain, would not impede/redirect flood flows, and would not be subject inundation by 100-year flood flows, seiches or tsunamis. Therefore, the Project would not contribute considerably to cumulative hydrology and water quality impacts, and cumulative hydrology and water quality impacts would be less than significant.

Land Use and Planning—The Project would be substantially consistent with applicable land use plans, policies and regulations (e.g., the General Plan Framework Element, Brentwood-Pacific Palisades Community Plan, LAMC, Mulholland Scenic Parkway Specific Plan, and SCAG's 2020–2045 RTP/SCS), and would result in less than significant land use and planning impacts. Specifically, the Project would not physically divide an established community, and would not cause a significant environmental impact due to a conflict with a land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect with approval of the requested land use entitlements. As with the Project, the related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Thus, cumulative land use impacts would be less than significant.

Mineral Resources—As indicated in Checklist Section XII, Mineral Resources, of this MND, the Project Site is not located within a City-designated Mineral Resource Zone or a mineral producing area as classified by the California Geological Survey such that the Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project vicinity. Therefore, the Project would not contribute considerably to cumulative mineral resources impacts, and cumulative mineral resources impacts would be less than significant.

Noise—As indicated in Checklist Section XIII, Noise, of this MND, Project construction-related noise impacts would be less than significant with mitigation, while Project operations-related noise impacts would be less than significant. Also, the closest related project is located approximately 0.35 mile from the Project Site such that Project construction and operations-related stationary source and activity-related noise would not combine with noise from the related projects to result in cumulative noise. Furthermore, while Project construction- and operations-related traffic noise would have the potential to add to similar such noise generated by the related projects, the Project's contribution would be minimal given the small size and small trip generation associated with the Project and would not result in significant construction- or operations-related traffic noise. Therefore, the Project would not contribute considerably to cumulative noise impacts, and cumulative noise impacts would be less than significant.

Population and Housing—As indicated in Checklist Section XIV, Population and Housing, of this MND, the Project would not construct or displace residential units such that there would be no direct impacts to

population and housing. While the Project would minimally increase on-site employment (i.e., 30 employees) and students (i.e., 100 students), these increases would not be expected to cause a substantial number of new households to move to the Brentwood–Pacific Palisades Community Plan area or generate a demand for substantial new housing. Furthermore, the Project Site is already developed with urban (i.e., school) uses, and the Project would not extend infrastructure to currently unserved areas and would not induce substantial population growth. Thus, as indicated in Checklist Section XIV, Project population and housing impacts would be less than significant. The Project would contribute little if any to additional population growth in the area. Thus, the Project would not contribute considerably to cumulative population and housing impacts, and cumulative population and housing impacts would be less than significant.

Public Services—As indicated in Checklist Section XV, Public Services, of this MND, while the Project Site is located within a Very High Fire Hazard Severity Zone, it must comply with the requirements set forth for the Mountain Fire District as outlined in Section 57.25.01 which have been formulated to be protective of development within this zone. Also as discussed in Checklist Section XV, the Project would meet City fire flow and emergency access requirements and City Building Code requirements related to fire protection, would implement a Construction Traffic Management Plan as required by mitigation herein to ensure adequate emergency access during construction, would not result in a substantial increase in demand for LAFD facilities and services, and would not result in substantial traffic congestion which could slow emergency response. Therefore, Project impacts to fire protection would be less than significant. As such, the Project would not contribute considerably to cumulative fire protection impacts, and cumulative fire protection impacts would be less than significant.

Regarding police protection, as indicated in Checklist Section XV the Project would not introduce a direct residential population typically associated with an increased demand for such services. In addition, any indirect increase in the local residential population within the Brentwood–Pacific Palisades Community Plan Area associated with the Project would be inconsequential. Moreover, the Project would include the implementation of security features such as fencing, controlled access to the campus, and security lighting which would be consistent with that currently occurring on-site and would not result in substantial traffic congestion which could slow emergency response. As recommended by LAPD and as mitigated herein, the Project would not contribute considerably to any cumulative police protection impacts, and cumulative police protection impacts would be less than significant.

As analyzed previously, the Project would not generate a direct residential population that could increase the demand for schools and libraries. In addition, any indirect increase in the local residential population associated with the Project would be inconsequential. Furthermore, the Project proposes expansion of existing private school facilities that would allow for increased student enrollment, and thus would be expected to reduce rather than increase the demand on public schools. The Project would result in less than significant impacts to schools and libraries. Therefore, the Project would not contribute considerably to any cumulative impacts to schools and libraries, and cumulative schools and libraries impacts would be less than significant.

Regarding parks and recreational facilities, the cumulative impact would be less than significant (see Parks and Recreation below).

Parks and Recreation—The Project does not include residential development, which typically creates a direct demand on park services. In addition, any indirect increase in the local residential population

associated with the Project would be inconsequential. Furthermore, the Project proposes several open space improvements for the use of school students and employees, including a new playground, seating area for students, courtyard, pedestrian paths, and additional landscaped areas. Thus, as indicated in Checklist Section XVI, Recreation, of this MND, the Project would meet its on-site demand for park and recreational facilities, and no substantial new demand for parks and recreational facilities would occur. In all, the Project's park and recreation impacts would be less than significant. Moreover, those related projects requiring discretionary approvals would be subject to CEQA review by the City which would address, in part, parks and recreational facilities service demand, and the related projects. Thus, the Project would not contribute considerably to cumulative parks and recreation impacts, and cumulative parks and recreation impacts would be less than significant.

Transportation—As discussed in Checklist Section XVII, Transportation, and in the Transportation Assessment and Related Projects Technical Memorandum included as Appendices 14.1 and 14.3, respectively, of this MND, the Project would: (1) be consistent with existing applicable transportation plans after mitigation, (2) result in less than significant traffic intersection level of service, VMT, and emergency access impacts; and (3) result in less than significant hazards due to geometric design features or incompatible uses after mitigation. In particular, the Project would not contribute to significant cumulative traffic congestion at area intersections or reduce the City's per capita VMT. Therefore, as mitigated herein, the Project would not contribute considerably to cumulative transportation impacts, and cumulative transportation impacts would be less than significant.

Tribal Cultural Resources—As discussed in Checklist Section XVIII, Tribal Cultural Resources, of this MND, the SCCIC records search conducted for the Project indicates that no tribal cultural resources have been documented on within a 0.5-mile radius of the Project Site. In addition, in the event that tribal cultural resources are uncovered, the Project and each related project would be required to comply with applicable regulatory requirements through compliance with the City's standard Conditions of Approval for archaeological resources and humane remains which have been formulated to avoid significant impacts to tribal cultural resources. Furthermore, the majority of the Mirman School Campus and the sites of the proposed improvements are underlain by fill material which has a low potential to contain tribal cultural resources. Nevertheless, the Project Site is located in an area historically occupied by Native American peoples, and during the AB 52 consultation process two local tribes requested the specific mitigation measures identified by the tribes be included in the MND to address the potential for the inadvertent discovery of tribal cultural resources during Project construction. With this mitigation, which would avoid significant Project impacts to tribal cultural resources, the Project would not contribute considerably to cumulative tribal cultural resources impacts, and cumulative tribal cultural resources impacts would be less than significant.

Utilities and Service Systems—Due to shared urban infrastructure, the Project and related projects would cumulatively increase water demand, wastewater generation, stormwater discharges, and energy and telecommunication service demand on the local water, sewer, stormwater drainage, and energy infrastructure. However, as discussed in Checklist Section XIX, Utilities and Service Systems, of this MND, adequate water, sewer, wastewater treatment, storm drainage, energy and telecommunication service infrastructure capacity exists to serve the Project, as does existing water supply, without the need for improvements to this infrastructure, such that Project utility and service system impacts in terms of these issues would be less than significant. In addition, the City continues to monitor wastewater flows and update infrastructure, as necessary, to accommodate the growth within the City (for example, through preparation of the One Water LA 2040 Plan which identifies programs and policies that will ensure sustainable, resilient, and long-term water supplies for Los Angeles). Furthermore, as with the Project,

new development projects occurring in the Project vicinity, including the related projects, would be required to coordinate with the City of Los Angeles LASAN via a sewer capacity availability request to determine adequate sewer capacity, and would be subject to LAMC Sections 64.11 and 64.12, which require approval of a sewer permit prior to connection to the sewer system. Lastly, both LADWP's 2015 UWMP and the City's One Water LA 2040 Plan indicate that the City has adequate water supplies to serve projected growth through at least 2040. Based on the above, the Project would not contribute considerably to cumulative impacts on utility and service systems, and cumulative utility and service systems impacts would be less than significant.

With regard to solid waste, the Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, unclassified landfills in the County do not generally have capacity concerns, and inert landfills serving the Project and the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regards to operational solid waste disposal needs, the minimal increase in solid waste generated by the Project would be well within the capacity of existing landfills as indicated in Checklist Section XIX of this MND. In addition, with the implementation of solid waste policies and objectives intended to help achieve the requirements of AB 939 and the City's 90 percent diversion goal, it is expected that the Project and related projects would not substantially reduce the projected timeline for landfills within the region to reach capacity. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Project would not contribute considerably to cumulative solid waste impacts, and cumulative solid waste impacts would be less than significant.

Wildfire—As discussed in Checklist Section XX, Wildfire, of this MND, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan as Mulholland Drive is not a designated emergency evacuation route and as the Project would not include alterations to off-site roads or to the school driveways off of Mulholland Drive. Also as discussed in Checklist Section XX, with mitigation as recommended herein, the Project would not exacerbate the wildlife risk. While the Project Site is located within a Very High Fire Hazard Severity Zone, the proposed uses would be constructed largely within the existing development footprint of the school and would comply with the requirements for the Mountain Fire District as outlined in Section 57.25.01 of the LAMC which have been formulated to mitigate the wildfire risk on development. Furthermore, as discussed in Checklist Section XX, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, after a fire, because: (1) the proposed improvements would occur largely within the existing development footprint of the school rather than in undeveloped hillside area; (2) retaining walls exist at the foot of most of the surrounding slopes; (3) previous stability analysis indicate pseudo static conditions; (4) the slopes which the Los Angeles General Plan Safety Element indicates have some potential for slope instability are located over 300 feet from the proposed improvements; and (5) Project Development would comply with the requirements for the Mountain Fire District as outlined in Section 57.25.01 of the LAMC, as well as with City hillside requirements which have been formulated to mitigate such risks. Thus, the Project would not contribute considerably to cumulative wildfire impacts, and cumulative wildfire impacts would be less than significant.

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

Less Than Significant Impact. Based on the analysis presented in this MND, implementation of the mitigation measures identified in this MND would reduce all the environmental impacts of the Project to

less than significant levels. Therefore, the Project would not have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly, and the impacts would be less than significant.