Draft Environmental Impact Report

Westside YMCA Facility at University High School

SCH# 2011031083

Prepared for:

Los Angeles Unified School District
Office of Environmental Health and Safety
1055 West 7th Street, 9th Floor
Los Angeles, CA 90017
Contact: Bill Piazza, CEQA Project Manager

Prepared by:

David Evans and Associates, Inc.
4200 Concours, Suite 200
Ontario, CA 91764

Hele Pacific Group

4849 Ronson Court
Suite 110
San Diego, CA 92111

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ES.1 INTRODUCTION

In March 2008, the Los Angeles Unified School District (LAUSD) and YMCA of Metropolitan Los Angeles (YMCA) entered into a development agreement to create a joint-use recreational facility and parking structure on the University High School campus. Use of the YMCA facility by LAUSD would be for the primary benefit of the students, faculty and staff of University High School as well as surrounding LAUSD-administered schools including, but not limited to, Webster Middle School, Emerson Middle School, Brentwood Science Magnet School, Richland Elementary School, and Brockton Elementary School. Under the joint-use development agreement, LAUSD students, staff, faculty, and guests would be allowed use of the gymnasium and recreation and multipurpose center. YMCA staff and members would be allowed limited use of facilities on the University High School campus including the track, recreational field and vehicle parking areas. Access to LAUSD classrooms or interior spaces by the YMCA would be restricted. The proposed facility would be constructed, operated, and maintained by the YMCA so as not to interfere with daily operation of University High School or LAUSD property.

ES.2 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The primary purpose of the California Environmental Quality Act (CEQA) is to inform the public and decision makers of the potential impacts and to allow an opportunity for public input to ensure informed decision making. CEQA requires all state and local government agencies to consider the environmental effects of projects over which they have discretionary authority. CEQA also requires each public agency to mitigate or avoid the significant environmental impacts resulting from Proposed Projects, when feasible, and to identify a range of feasible alternatives to the Proposed Project that could reduce or avoid those environmental effects.

Under CEQA, a project Environmental Impact Report (EIR) analyzes the impacts of an individual activity or specific project and focuses primarily on changes in the environment that would result from the activity or project. The EIR must include the contents required by CEQA and the *CEQA Guidelines* and must examine all phases of the project, including planning, construction, operation, and any reasonably foreseeable future phases.

ES.3 USE OF THE PROGRAM EIR

In response to state and local legislation and the need to provide additional school facilities throughout LAUSD, the Los Angeles Board of Education (Board) adopted goals and guidelines that provide a policy framework addressed in the Facilities Master Plan (updated June 2000). The New School Construction Program is a multi-phased effort to provide additional classroom seats by constructing new schools and/or expanding existing school campuses pursuant to the Facilities Master Plan. The Board has adopted the Program EIR (PEIR) that identifies the objectives for the New School Construction Program and includes a general discussion of anticipated impacts (LAUSAD, June 2004).

The PEIR provides environmental review of the New School Construction Program in accordance with the requirements of CEQA. The Final PEIR was certified by the Board on June 8, 2004. The PEIR provides general analysis of program-related impacts with later CEQA documents required for specific individual projects through a process known as *tiering.* This document incorporates the Program EIR by reference. This document also applies the thresholds of significance recommended in the Program EIR to determine the significance of environmental effects.

The PEIR includes standard mitigation measures and related performance standards that the LAUSD applies to future projects. In site-specific review, LAUSD applies the performance standards set forth in the PEIR to confirm that one or more mitigation measures will effectively avoid or reduce particular environmental impacts.

ES.4 PROJECT OBJECTIVES

The Proposed Project is intended to fulfill the terms of the joint-use agreement between LAUSD and the YMCA. Implementation of the Proposed Project is intended to meet the following objectives:

1.) Establish a joint-use community facility and public school that provides mutually beneficial amenities to the students, teachers and communities served by LAUSD and YMCA;

2.) Provide programming and services that complement the academic and physical fitness programs of both the LAUSD and YMCA;

3.) Maximize the utilization of real estate assets to demonstrate efficient use of limited land and public resources; and

4.) Promote schools that serve as centers of the community.

ES.5 PROJECT LOCATION AND SETTING

The Proposed Project site is located in Local District 3, in the City of Los Angeles, California, in the southwest portion of the existing University High School campus located at 11800 Texas Avenue, Los Angeles, California 90025. The Proposed Project would be bound by South Westgate Avenue to the west and Ohio Avenue to the south. The Proposed Project would be constructed adjacent to the University High School gymnasium, on Assessor Parcel Number (APN): 4263-021-904, and on a portion of APN: 4263-022-901. The project area is located approximately 200 feet north of Santa Monica Boulevard and 0.75-mile west of Interstate 405 (I-405)

The Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts and four bungalow buildings used as portable classrooms and a locker room/restroom. Asphalt surface parking and basketball courts are currently located along Ohio Avenue in the southern portion of the project site. The Proposed Project site and vicinity are located in the central portion of the City of Los Angeles at the northern limits of the West Los Angeles Community Planning Area. The area immediately east and west of University High School is intensely urbanized and characterized by a mix of medium- and high-density residential development. Commercial uses are located immediately south of the Proposed Project site along Santa Monica Boulevard.

The Proposed Project site is located in the West Los Angeles Community Planning Area. The current General Plan designation and zoning of the existing school site is Public Facilities (PF). The Proposed Project is also located within the limits of the West Los Angeles Transportation Improvement and Mitigation Specific Plan area.

ES.6 PROJECT DESCRIPTION

YMCA Facility and Parking Structure

The Proposed Project would construct a 62,500 square-foot YMCA facility within the University High School campus. The new YMCA facility would include a pool room, weight and fitness center with accompanying locker rooms; multipurpose room/indoor court, lobby area with a community room; classroom and testing/examination areas; lounge, and sections for child watch and school-age child care. A portion of the YMCA facility would be one-story; a second story mezzanine level would be located above the pool room. The YMCA facility would have a barrel roof and be approximately 40-feet in height. This facility would be located adjacent to and west of a University High School gymnasium that was recently constructed.

The Proposed Project also includes construction of a four-level (45-foot tall) parking structure capable of accommodating 181 motor vehicle spaces. The proposed parking structure would be perpendicular to and adjoin the YMCA

facility. Direct access from the parking structure to the YMCA facility would be provided. The parking structure would be located adjacent to South Westgate Avenue (see Figure 2-4. Site Plan, and Figure 2-5. Profile Plan).

As noted, the Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts, and four bungalow buildings which are used as portable classrooms and a locker room/restroom. Asphalt surface parking and basketball courts are currently located along Ohio Avenue in the southern portion of the project site. Uses currently occupying the project site would be demolished to accommodate the Proposed Project. The bungalow buildings are no longer used by University High School; thus, no related improvements on campus would be required to accommodate classroom and related uses. The YMCA facility would replace recreational amenities demolished for construction. Construction would begin in fall, 2012 and be completed in late 2013 or early 2014.

Alley and Roadway Vacation

The YMCA is proposing to vacate public right-of-way easement located on the University High School campus. The area proposed to be vacated includes the following: (1) a segment of Granville Avenue, approximately 150 feet in length and 60 feet wide, which continues northwest from the intersection with Ohio Avenue and dead ends within the campus; and (2) the 15-foot wide alley which runs southwest between the terminus of Granville Avenue and South Westgate Avenue. The area to be vacated is depicted on Figure 2-6. Proposed Vacation of Public Right-of-Way. The total area to be vacated is 9,500 square feet. The City of Los Angeles requires vacations 10,000 square feet and greater to undergo discretionary review. Because this action is less than 10,000 square feet it does meet discretionary review thresholds; however, potential environmental effects are evaluated herein as part of the overall Proposed Project action.

ES.7 PROPOSED PROJECT IMPACTS

This EIR is focused only on those environmental impact categories identified by LAUSD as having *potentially significant* impacts during the notice of preparation, scoping process, and public review period for the Initial Study. Other environmental concerns that were found to have no impact or a less-than-significant impact are, therefore, not discussed in this document. Environmental factors are listed by the level of significance of their impacts below in Table ES-1 as determined in the Initial Study (Appendix A).

Table ES-1. Significance of Environmental Parameters

No Impact	Less than Significant Impact	Potentially Significant Impact
Agricultural Resources	Aesthetics	Air Quality
Mineral Resources	Biological Resources	Cultural Resources
Recreation and Parks	Geology and Soils	Energy
Land Use and Planning	Hydrology and Water Quality	Noise
	Population and Housing	Public Services
	Utilities and Service Systems	Transportation/Traffic
		Greenhouse Gases

ES.7.1 Unavoidable Adverse Impacts

The potentially adverse effects of the Proposed Project are discussed in Chapter 3 of the EIR. Project design features and mitigation measures have been identified to reduce all significant impacts to less than significant levels. Therefore, no unavoidable adverse impacts would result from the Proposed Project.

ES.7.2 Cumulative Impacts

Cumulative impacts could occur as a result of past, present, and reasonably foreseeable future projects. The Proposed Project would contribute to cumulative effects when the Proposed Project is combined with other projects in the vicinity. Cumulative impacts have been determined to be less than significant with implementation of standard conditions and mitigation where identified for air quality, noise and cultural resources.

ES.7.3 Growth-Inducing Impacts

Direct Growth-Inducing Impacts in the Surrounding Environment

A project would directly induce growth if it would remove barriers to population growth. This would include amendments to a General Plan and Zoning Ordinance allowing new residential development. The Proposed Project would develop a new YMCA facility on an existing school site. The Proposed Project would serve residents within the general study area and students, faculty and staff of University High School and surrounding schools as discussed in Section 2.0. Project Description. The Proposed Project would serve an existing population. It would not induce growth or otherwise contribute to an increase in population within proximity to the YMCA facility.

Indirect Growth-Inducing Impacts in the Surrounding Environment

A project would indirectly induce growth if it would increase the capacity of infrastructure in an area in which the public service currently meets demand. Examples would be increasing the capacity of a sewer treatment plant or a roadway beyond that needed to meet existing demand. The Proposed Project would use existing utility infrastructure and public services. No upgrades or expansion to existing utilities or Los Angeles Fire Department resources would be required to serve the Proposed Project.

ES.7.4 Mitigation Measures

A summary of the impacts, mitigation measures, and residual impacts for the Proposed Project and alternatives is provided in Table ES-2.

Table ES-2. Summary of Mitigation Measures

Impact	Significance	Mitigation Measures	Level of Significance After Mitigation
Air Quality			
Impact A-1: (Would the project) violate any air quality standard or contribute substantially to an existing or projected air quality violation.	Less than significant	Implementation of BMPs would reduce temporary air quality impacts due to construction. No mitigation is required.	Less than significant
Impact A-2: (Would the project) create or contribute to a non-stationary source "hotspot" (primarily carbon monoxide).	Less than significant	No mitigation is required.	Less than significant
Impact A-3: (Would the project) expose sensitive receptors to substantial pollutant concentrations.	Less than significant	Implementation of BMPs would reduce temporary air quality impacts due to construction. No mitigation is required.	Less than significant
Cultural Resources			
Impact B-1: (Would the project) cause a substantial adverse change in the significance of a historical resources as defined in §15064.5.	Less than significant	No mitigation is required.	Less than significant
Impact B-2: (Would the project) directly or indirectly destroy a unique paleontological resource or site.	Less than significant with mitigation	LAUSD shall implement the following measures to prevent the direct or indirect destruction of a unique paleontological resource or site: **3B.1** Prior to initiation of ground-disturbing activities, qualified archaeologists shall conduct a short awareness training session for all construction workers and supervisory personnel. The course will explain the importance of and legal basis for	Less than significant

Impact	Significance	Mitigation Measures	Level of Significance After Mitigation
		the protection of significant archaeological resources. Each worker will also learn the proper procedures to follow in the event cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of their supervisor and the archaeological monitor. This worker education session shall include visuals of artifacts (prehistoric and historic) that might be found in the project vicinity, and that it take place on-site immediately prior to the start of ground disturbance. The approximately 30- to 45-minute training session may be conducted on site by video, PowerPoint presentation, or related media.	
		3B.2 Given the high likelihood that project construction could encounter archeological resources, Native American and archeological monitoring shall commence during all grading and excavation associated with the project. Monitoring shall consist of directly watching the excavation and earth-moving activities for the entirety of each work day. If cultural resources are observed during monitoring, the archaeological monitor shall alert the construction supervisor that work needs to be temporarily halted or excavation equipment diverted to examine the find. If the monitors suspect that significant cultural remains have been encountered, the piece of equipment that encounters the find shall be stopped or diverted to another work area, and the excavated area inspected by the monitoring archaeologist/Native American. If potentially significant deposits are found, the principal	

Impact	Significance	Mitigation Measures		Level of Significance After Mitigation
			investigator shall inspect the deposits and develop recommendations for identification, testing, evaluation, preservation, or mitigation, as appropriate. If the principal investigator determines that the suspected remains are non-significant or non-cultural in origin, work shall recommence immediately following basic documentation. If further study is determined to be warranted, the find(s) shall be mapped, recorded, and bagged with the proper provenience and the item(s) collected by the archaeological monitor.	
Impact 3B-3: Would the Project result in a cumulatively considerable impact with respect to paleontological resources.	Less than significant with mitigation	**3B.3**	All project-related ground disturbances greater than 6 feet that could potentially impact paleontologically sensitive Quaternary older alluvium will be monitored by a qualified paleontological monitor on a full-time basis, as this geologic unit is considered to have a high paleontological sensitivity. Any substantial excavations that occur in surficial younger (Holocene age) Quaternary alluvial and fluvial deposits and/or topsoil (estimated to occur at less than 6 feet in depth) will be monitored on a part-time basis to ensure that underlying paleontologically sensitive sediments are not being impacted.	Less than significant
		3B.4	A Qualified Paleontologist will be retained to supervise monitoring of construction excavations greater than 6 feet and to produce a Paleontological Monitoring and Mitigation Plan for the Proposed Project.	

Impact	Significance	Mitigation Measures	Level of Significance After Mitigation
		3B.5 At each fossil locality, field data forms will be used to record pertinent geologic data, stratigraphic sections will be measured, and appropriate sediment samples will be collected and submitted for analysis. **3B.6** Recovered fossils will be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited in a designated paleontological curation facility. The most likely repository is the Natural History Museum of Los Angeles County (LACM). **3B.7** The Qualified Paleontologist will prepare a final monitoring and mitigation report to be filed with the client, the lead agency, and the repository.	
Noise			
Impact D-1: (Would the project result in) exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less than significant	Implementation of BMPs would reduce temporary noise impacts due to construction. No mitigation is required.	Less than significant
Impact D-2: (Would the project result in) exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.	Less than significant	Implementation of BMPs would reduce temporary noise impacts due to construction. No mitigation is required.	Less than significant
Impact D-3: (Would the project result in) a	Less than	Implementation of BMPs would reduce temporary noise	Less than

Impact	Significance	Mitigation Measures	Level of Significance After Mitigation
substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.	significant	impacts due to construction. No mitigation is required.	significant
Impact D-4: (Would the project result in) a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	Less than Significant with Mitigation.	Implementation of BMPs would reduce temporary noise impacts due to construction. No mitigation is required.	Less than significant.
Public Services			
Impact E-1: (Would the project) result in unacceptable service ratios, response times or other performance objectives for fire protection services.	Less than significant	No mitigation is required.	Less than significant
Traffic and Circulation			
Impact F-1: (Would the project) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	Less than significant	No mitigation is required.	Less than significant
Impact F-2: (Would the project) conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency	Less than significant	No mitigation is required.	Less than significant

Impact	Significance	Mitigation Measures	Level of Significance After Mitigation
for designated roads or highways.			
Energy			
Impact G-1: (Would the project) Result in a conflict with an energy conservation plan?	Less than significant	No mitigation is required.	Less than significant
Impact G-2: (Would the project) result in the use of nonrenewable resources in a wasteful and inefficient manner.	Less than significant	No mitigation is required.	Less than significant
Impact G-3: (Would the project) Result in a significant demand on regional energy supply or require substantial alterations to existing power or natural gas systems.	Less than significant	No mitigation is required.	Less than significant

Table ES-3. Summary of Best Management Practices

Impact	*Best Management Practices (BMPs)*
3A. AIR QUALITY	
Impact A-1: (Would the project) violate any air quality standard or contribute substantially to an existing or projected air quality violation. **Impact A-2:** (Would the project) create or contribute to a non-stationary source "hotspot" (primarily carbon monoxide). **Impact A-3:** (Would the project) expose sensitive receptors to substantial pollutant concentrations.	LAUSD shall require its construction contractor to comply with all applicable SCAQMD rules and regulations in carrying out its program. To reduce the potential for significant hazardous emissions during a removal action, LAUSD or its construction contractor shall: ▪ Maintain slow speeds with all vehicles; ▪ Load impacted soil directly into transportation trucks to minimize soil handling; ▪ During dumping, minimize soil drop height into transportation trucks or stockpiles; ▪ During transport, cover or enclose trucks transporting soils, increase freeboard requirements, and repair trucks exhibiting spillage due to leaks; or ▪ Place stockpiled soil in areas shielded from prevailing winds.
3D. NOISE	
Impact D-1: (Would the project result in) exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **Impact D-2:** (Would the project result in) exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. **Impact D-3:** (Would the project result in) a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. **Impact D-4:** (Would the project result in) a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	▪ LAUSD shall require its construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. ▪ LAUSD shall require its construction contractor to provide advance notice of the start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area and include specifically where and when construction activities will occur and provide contact information for filing noise complaints. ▪ During construction activities, the construction contractor shall, to the extent feasible, locate portable equipment and shall store and maintain equipment away from the adjacent residents. ▪ LAUSD shall require its construction contractor to comply with all applicable noise ordinances of the affected jurisdiction.
3F. TRANSPORTATION AND TRAFFIC	
Impact F-1: (Would the project) conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.	▪ LAUSD shall require its contractors to submit a construction worksite traffic control plan to the County for review prior to construction. The plan shall show the location of haul routes, construction hours, protective devices, warning signs, and access to abutting properties. ▪ LAUSD shall encourage its contractors to limit construction-related trucks to off-peak commute periods. ▪ As required by Caltrans, applicable transportation related safety measures shall be implemented during construction.

Impact	*Best Management Practices (BMPs)*
Impact F-2: (Would the project) conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	

Table ES-4 . Summary of Design Criteria

Impact	*Design Criteria*
Impact G-1: (Would the project) Result in a conflict with an energy conservation plan? **Impact G-2:** (Would the project) result in the use of nonrenewable resources in a wasteful and inefficient manner. **Impact G-3:** (Would the project) Result in a significant demand on regional energy supply or require substantial alterations to existing power or natural gas systems.	LAUSD requires all new buildings to be designed and constructed consistent with the standards contained in Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards, of the California Code of Regulations (CCR).

ES.8 ALTERNATIVES TO THE PROPOSED PROJECT

The Draft EIR identifies several alternatives to the Proposed Project that represent a reasonable range pursuant to the CEQA Guidelines. Some alternatives were evaluated in the Draft EIR, and eliminated from further consideration because they did not meet a majority of the project objectives.

ES.8.1 Alternatives Evaluated in the EIR

The following alternatives are described and evaluated in Chapter 4 of the Draft EIR.

No-Project Alternative

CEQA Guidelines Section 15126.6(e) requires the analysis of a no-project alternative. This analysis must discuss the existing condition, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved based on current plans, site zoning, and consistency with available infrastructure and community services.

If the project is a development project on an identifiable property, the no-project alternative is defined as the circumstance under which the project would not proceed. The discussion compares the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project were approved.

If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of another project, the no-project consequence should be discussed. In certain instances, the no-project alternative means "no build," wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the no-project analysis should identify the practical result of the project's non-approval—that is what reasonably foreseeable development would result—and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. As discussed, the Reasonably Foreseeable On-site Development Alternative was considered and rejected from further consideration because determining potential future on-site development would be speculative, as described under Section 4.3 above.

Under the No-Project Alternative, the proposed YMCA at University High School would not be constructed. The terms of the March 2008 joint-use agreement between LAUSD and the YMCA would not be fulfilled. Surrounding LAUSD-administered schools including but not limited to Webster Middle School, Emerson Middle School, Brentwood Science Magnet School, Richland Elementary School, and Brockton Elementary School, would not have access to the proposed joint-use facility at University High School. The current site would remain in its present condition into the foreseeable future.

Reduced Project Size Alternative

The Reduced Project Size Alternative involves the development of the Proposed Project with a twenty-five percent reduction in the size and scale. The reduction in project size would result in fewer and/or smaller recreational and educational amenities (pool room, weight and fitness center, classroom and test/examination rooms.

As proposed, the current project design calls for a two-level 62,500 square-foot facility and accompanying four-level parking structure capable of accommodating 181 motor vehicle parking spaces. The reduction in project size would result in a proportional reduction in the size of the parking structure from four to three levels and from 181 parking spaces to 136 spaces. The YMCA facility would be reduced to approximately 46,875 square feet.

On-site Alternative – Underground Parking and Surface Parking Lot adjacent to Barrington Avenue

During planning for the Proposed Project, an alternative configuration for the parking element was considered but rejected. This alternative would develop the proposed YMCA facility with 1 ½ levels of underground parking, and approximately 52,000 square feet of paved surface parking including 41,000 square feet of paved surface parking adjacent to South Barrington Avenue. This

alternative was added to the alternatives impact analysis and evaluated in Section 4.5.3.

ES.8.2 Alternatives Eliminated from Further Consideration

In addition to the alternatives analyzed above, other alternatives were initially identified and then eliminated from further consideration. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered. Several alternatives were considered by the YMCA and LAUSD during the site selection process for the proposed facility. This section identifies alternatives considered by the lead agency but rejected as infeasible and provides a brief explanation of the reasons for their exclusion.

Reasonably Foreseeable On-site Development Alternative

This alternative considers a reasonably foreseeable future use of the site if the Proposed Project is not constructed. If the Proposed Project were not developed, existing land uses would remain in place for the foreseeable future. The Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts, and four bungalow buildings owned by LAUSD. These buildings are used as portable classrooms and a locker/restroom. Existing land uses that occupy the site are consistent with the general plan and zoning for the site; therefore, it would be remote and speculative to discern any other potential on-site development. Thus, this alternative was dropped from further consideration within this EIR.

Alternative School Site – Webster Middle School

When the YMCA and LAUSD began discussions regarding developing a joint use project, Webster Middle School, located at 11330 Graham Place, was initially identified as a feasible location for the Proposed Project. Webster Middle School is on a large 22 acre site and has sufficient excess acreage to accommodate the Proposed Project. This school is also located in proximity to those anticipated to use the YMCA facility. However, this site was eliminated because of the potential conflict between the adult programs offered by the YMCA and the age of Webster Middle School's student population. This site also does not have outdoor athletic facilities (tracks and fields) that would be available for joint-use.

On-site Alternative – Off-site Parking

During planning for the Proposed Project, an alternative configuration on the University High School site was considered but rejected. This alternative would develop a proposed joint-use facility on-site with vehicle parking at an off-site location instead of development of a parking lot adjacent to Barrington Avenue. This alternative was considered during the planning phase to minimize the project footprint on the existing campus. Further, this alternative would be less

costly than constructing underground parking or a parking structure. However, this alternative was ultimately rejected because no feasible off-site parking could be identified.

ES.8.3 Environmentally Superior Alternative

The findings of the alternatives impact analysis discussed above are summarized in Table 4-1. Of the alternatives analyzed in this document, the No-Project Alternative is considered the environmentally superior alternative, as it would avoid all impacts related to the Proposed Project. However, the No-Project Alternative would not meet the objectives of the Proposed Project, as it would not implement the joint-use agreement or provide programming for additional academic and physical fitness programs. The No-Project Alterative would also not maximize the utilization of LAUSD real estate assets.

The CEQA Guidelines (Section 15126.6) require that, if the No-Project Alternative is determined to be the environmentally superior alternative, an environmentally superior alternative must also be identified among the remaining alternatives. As such, the Reduced Project Size Alternative would be the environmentally superior alternative, as it would reduce potential impacts during construction and require less energy to operate. However, reducing the facility size would not achieve the following project objectives, to the extent that the Proposed Project would:

- Maximize the utilization of real estate assets to demonstrate efficient use of limited land and public resources.

The Reduced Project Size Alternative would not sufficiently achieve project objectives; and therefore, has been eliminated from consideration.

Chapter 1. Introduction

1.1 PURPOSE AND OVERVIEW OF THE EIR PROCESS

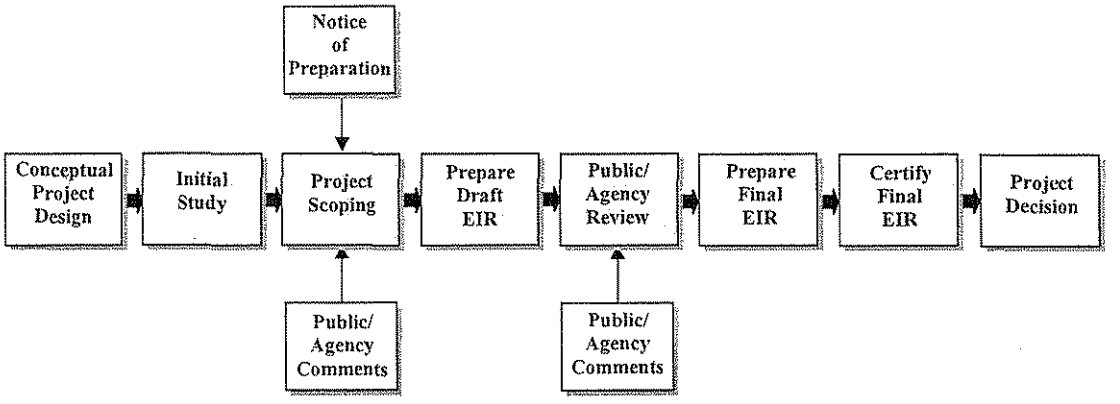
The Westside YMCA (YMCA), in collaboration with the Los Angeles Unified School District (LAUSD, or the District), is proposing to construct a joint-use facility and parking structure within the University High School campus in the City of Los Angeles, California. All projects within the State of California are required to undergo environmental review to determine potential impacts associated with implementation of the project in accordance with the California Environmental Quality Act (CEQA).

CEQA was enacted in 1970 by the California legislature to disclose to decision makers and the public, significant environmental effects of proposed activities and methods to avoid or reduce the environmental effects by implementing feasible alternatives or mitigation measures. CEQA applies to all California governmental agencies at all levels, including local, regional and state agencies; boards, commissions, and special districts (such as LAUSD). LAUSD is the lead agency for the proposed Westside YMCA at University High School Project (Proposed Project) and as such is required to conduct an environmental review to analyze the potential environmental effects associated with the Proposed Project.

An Initial Study (IS) was prepared for this Proposed Project in early 2011 and is incorporated herein by reference (see Appendix A of this Draft Environmental Impact Report [DEIR or Draft EIR]). The findings of the IS process determined that preparation of an EIR for the Proposed Project was warranted. The findings and input gathered during the public review period (see Section 1.3) were used in preparing this Draft EIR, which is now being circulated to the public and affected agencies for review and comment.

One of the primary objectives of CEQA is to enhance public participation in the planning process. Public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request notification regarding meetings and release of documents; monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity offered by the lead agency. The environmental review process provides many opportunities for the public to participate through scoping, public review of CEQA documents, and public hearings (see Figure 1-1).

Figure 1-1. The Environmental Review Process



1.2 USE OF THE NEW SCHOOL CONSTRUCTION PROGRAM EIR

LAUSD prepared a Program EIR (PEIR) which provides environmental review for the New School Construction Program (Program) in accordance with the requirements of CEQA. The Program is a multi-phased effort to provide additional classroom seats and other school amenities by constructing new schools and/or expanding existing school campuses pursuant to the Facilities Master Plan. The LAUSD Board of Education (Board) certified the PEIR on June 8, 2004. The PEIR provides general analysis and guidance on the Program, while subsequent CEQA documents provide project-specific analysis through a process known as *tiering*. This project-specific document incorporates the PEIR by reference and concentrates on site-specific issues related to the Proposed Project. The PEIR is available for review at the LAUSD Facilities Services Division web site (www.laschools.org/documents).

In addition to providing an analysis of potential environmental impacts, the PEIR includes standard mitigation measures and performance standards (best management practices [BMPs]) that LAUSD applies to specific projects as appropriate to reduce, minimize or avoid or reduce environmental impacts.

1.3 SCOPE OF THE EIR

This section provides a summary of the issues addressed in this project-specific Draft EIR. This Draft EIR was prepared following input from the public, responsible agencies, affected agencies, and other interested parties through the EIR scoping process, which included the following:

- In accordance with the CEQA Guidelines, an IS and Notice of Preparation (NOP) were prepared and distributed on March 24, 2011. The NOP was distributed to responsible agencies, affected agencies, interested parties, and the California Office of Planning and Research to officially solicit participation in determining the scope and content of the EIR. The NOP review/comment

period extended for 30 days after receipt of the NOP and ended on April 22, 2011;

- The NOP was posted in the Los Angeles County Clerk's office for the full 30 day NOP review/comment period; and
- Information provided during the 30-day public review period regarding the contents of the IS/NOP and the scope of the EIR was incorporated in this draft EIR.

The content of the Draft EIR was established based on the findings in the IS and as a result of public and agency input. Under CEQA Guidelines, the analysis in the Draft EIR is focused on issues determined in the IS to be potentially significant, whereas issues that were found to have less-than-significant impacts or no impact within the IS do not require further evaluation. Based on the analysis provided in the IS, this Draft EIR evaluates project-related impacts to the following environmental issues:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Noise
- Public Services (Fire Services)
- Transportation and Traffic, and
- Energy

1.4 EIR ORGANIZATION

The Draft EIR is organized into the following chapters so the reader can easily obtain information about the Proposed Project and its specific issues.

- **"Executive Summary"** presents a summary of the Proposed Project and considered alternatives, potential impacts and mitigation measures, and analysis and conclusions pertaining to potential growth inducement and cumulative impacts.
- **"Chapter 1. Introduction"** describes the purpose and use of the EIR, provides a brief overview of the Proposed Project, and outlines the organization of the EIR.
- **"Chapter 2. Project Description and Environmental Setting"** describes the project location, project details, baseline environmental setting and existing physical conditions, and the LAUSD's overall objectives for the Proposed Project.
- **"Chapter 3. Environmental Analysis"** describes the existing conditions, or setting, before project implementation; methods and assumptions used in impact analysis; thresholds of significance; impacts that would result from the

Proposed Project; and applicable mitigation measures that would eliminate or reduce significant impacts for each environmental issue.

- **"Chapter 4. Alternatives Analysis"** evaluates the environmental effects of project alternatives, including the No-Project Alternative and Environmentally Superior Project Alternative, and compares these impacts with those associated with the Proposed Project.
- **"Chapter 5. Other CEQA Considerations"** includes a discussion of issues required by CEQA that are not covered in other chapters. This includes unavoidable adverse impacts, impacts found not to be significant, irreversible environmental changes, and growth-inducing impacts.
- **"Chapter 6. Acronyms and Abbreviations"** presents a list of the acronyms and abbreviations.
- **"Chapter 7. References"** identifies the documents and individuals consulted in preparing this Draft EIR.
- **"Chapter 8. Report Preparation"** lists the individuals involved in preparing this Draft EIR and organizations and persons consulted.
- **Appendices** present data supporting the analysis or contents of this Draft EIR. The appendices include the following:
    - Appendix A: Notice of Preparation, Initial Study, Technical Appendices, and Comments on Initial Study;
    - Appendix B: Air Quality and Greenhouse Gas Emissions Technical Report;
    - Appendix C: Cultural Resources Technical Report;
    - Appendix D: Noise Impact Study;
    - Appendix E: Traffic Impact Study; and
    - Appendix F: Draft EIR Public Agencies Distribution List.

Additional documents referenced in this Draft EIR and not included in the appendices are available at LAUSD's Office of Environmental Health and Safety located at 333 South Beaudry Avenue, 27th Floor, Los Angeles, California 90017.

1.5 AVAILABILITY OF THE DRAFT EIR

The Draft EIR for the Proposed Project is being distributed directly to numerous agencies, organizations, and interested groups and persons for comment during the formal review period. The Draft EIR is also available for review at the following locations:

- LAUSD Office of Environmental Health and Safety, 333 South Beaudry Avenue, 27th Floor, Los Angeles, CA 90017
- LAUSD Local District 3 Office, 11380 West Graham Place, Los Angeles, CA 90064
- Brentwood Branch Library, 11820 San Vicente Boulevard, Los Angeles, CA 90049
- West Los Angeles Regional Branch Library, 11360 Santa Monica Boulevard, Los Angeles, CA 90025
- Webster Middle School, 11330 West Graham Place, Los Angeles, CA 90064
- Emerson Middle School, 1650 Selby Ave, Los Angeles, CA 90024
- Brentwood Science Magnet School, 740 Gretna Green Way, Los Angeles, CA 90049

In addition, the Draft EIR is available online at the LAUSD Facilities Services Division web site (www.laschools.org/find-a-school).

LAUSD will receive public input on the Proposed Project and the Draft EIR at a meeting to be held on MONTH DAY, 2012, at 6:00 p.m. at University High School located at 11800 Texas Avenue, Los Angeles, California 90025, before making a recommendation to the Board. Comments from the community and interested parties are encouraged at all public hearings before the LAUSD Facilities Committee and the Board. Information concerning the public review schedule for the Draft EIR and public meetings can be obtained by contacting Bill Piazza, CEQA Project Manager, at (213) 241-3926 or by accessing the LAUSD Facilities Services Division web site (www.laschools.org). Upon completion of the formal public review period, written responses to all comments on environmental issues discussed in the Draft EIR will be prepared and incorporated into the Final EIR.

1.6 AGENCY COMMENTS

If this document includes information necessary for an agency to meet any statutory responsibilities related to the Proposed Project, LAUSD requests comments on the scope and content of the environmental information provided herein. LAUSD assumes the agency will need to use the environmental documents prepared by LAUSD when considering any permits or other approvals necessary to implement the Proposed Project. The environmental topics studied by LAUSD are provided in Chapter 3 of this EIR and in the Initial Study (see Appendix A).

The project description, location, and the environmental issues potentially affected by the Proposed Project are contained in this Draft EIR. Due to the time limits mandated by state law CEQA Guidelines Section 15205(d), your comments must be sent to LAUSD within the 45-day comment period or no later than MONTH DAY, 2012. Please send your response to:

Bill Piazza, CEQA Project Manager
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 27th Floor
Los Angeles, CA 90017

Comments may also be sent by FAX to (213) 241-6816 or by email to bill.piazza@lausd.net. Agency responses to the Draft Environmental Impact Report should include the name of a contact person within the commenting agency. Upon completion of the formal public review period, written responses to all comments on environmental issues discussed in the Draft EIR will be prepared and incorporated into the Final EIR.

Chapter 2. Project Description and Environmental Setting

2.1 PROJECT BACKGROUND

In March 2008, the LAUSD and YMCA entered into a development agreement to create a joint-use recreational facility on the University High School campus. Under the terms of the agreement, the property on which the improvements would be constructed would be leased from LAUSD for a 40 year period. The 40 year lease provides for two 20 year extensions with LAUSD Board of Education approval, allowing for a combined lease period of 80 years. The YMCA would develop the Proposed Project and own the improvements. The property would remain under LAUSD ownership. Upon expiration or termination of the joint-use development agreement, ownership of the YMCA facility and related improvements would revert to LAUSD.

The development agreement calls for the creation of a "Joint-Use Committee", which would be responsible for establishing specific procedures and operating parameters for joint-use of the facility. Use of the YMCA facility by LAUSD would be for the primary benefit of the students, faculty and staff of University High School as well as surrounding LAUSD-administered schools including, but not limited to, Webster Middle School, Emerson Middle School, Brentwood Science Magnet School, Richland Elementary School, and Brockton Elementary School. Under the joint-use development agreement, LAUSD students, staff, faculty, and guests would be allowed use of the gymnasium and recreation and multipurpose center. YMCA staff and members would be allowed limited use of facilities on the University High School campus including the track, recreational field and vehicle parking areas. Access to LAUSD classrooms or interior spaces by the YMCA would be restricted. The proposed facility would be constructed, operated, and maintained by the YMCA so as not to interfere with daily operation of University High School or LAUSD property.

2.2 PROJECT OBJECTIVES

The Proposed Project is intended to fulfill the terms of the joint-use agreement between LAUSD and the YMCA. Implementation of the Proposed Project is intended to meet the following objectives:

1.) Establish a joint-use community facility and public school that provides mutually beneficial amenities to the students, teachers and communities served by LAUSD and YMCA;

2.) Provide programming and services that complement the academic and physical fitness programs of both the LAUSD and YMCA;

3.) Maximize the utilization of real estate assets to demonstrate efficient use of limited land and public resources; and

4.) Promote schools that serve as centers of the community.

2.3 PROJECT LOCATION AND SITE CHARACTERISTICS

2.3.1 Location

The Proposed Project site is located in Local District 3, in the City of Los Angeles, California, in the southwest portion of the existing University High School campus. The address of University High School is 11800 Texas Avenue, Los Angeles, California 90025. The Proposed Project would be bound by South Westgate Avenue to the west and Ohio Avenue to the south. The Proposed Project would be constructed adjacent to the University High School gymnasium, on Assessor Parcel Number (APN): 4263-021-904, and on a portion of APN: 4263-022-901. The project area is located approximately 200 feet north of Santa Monica Boulevard and 0.75-mile west of Interstate 405 (I-405) (See Figure 2-1. Regional Location Map, and Figure 2-2. Vicinity Location Map).

2.3.2 Physical Environmental Setting

Existing Land Uses

The Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts and four bungalow buildings used as portable classrooms and a locker room/restroom. Asphalt surface parking and basketball courts are currently located along Ohio Avenue in the southern portion of the project site (Figure 2-3. Aerial Photo).

Surrounding Land Uses

The Proposed Project site and vicinity are located in the central portion of the City of Los Angeles at the northern limits of the West Los Angeles Community Planning Area. The area immediately east and west of University High School is intensely urbanized and characterized by a mix of medium- and high-density residential development. Commercial uses are located immediately south of the Proposed Project site, along Ohio Avenue/Santa Monica Boulevard. Surrounding properties include residential and commercial uses including apartment buildings, an automotive repair center, cleaning and laundry facility, smog-check station, towing company (and EZ Lube facility), sports apparel outfitter, and a thrift store.

General Plan Designation and Zoning

The Proposed Project site is located in the West Los Angeles Community Planning Area. The current General Plan designation and zoning of the existing school site is Public Facilities (PF). The Proposed Project is also located within the limits of the West Los Angeles Transportation Improvement and Mitigation Specific Plan area (ZIMAS, 2010).

Figure 2-1. Regional Location Map

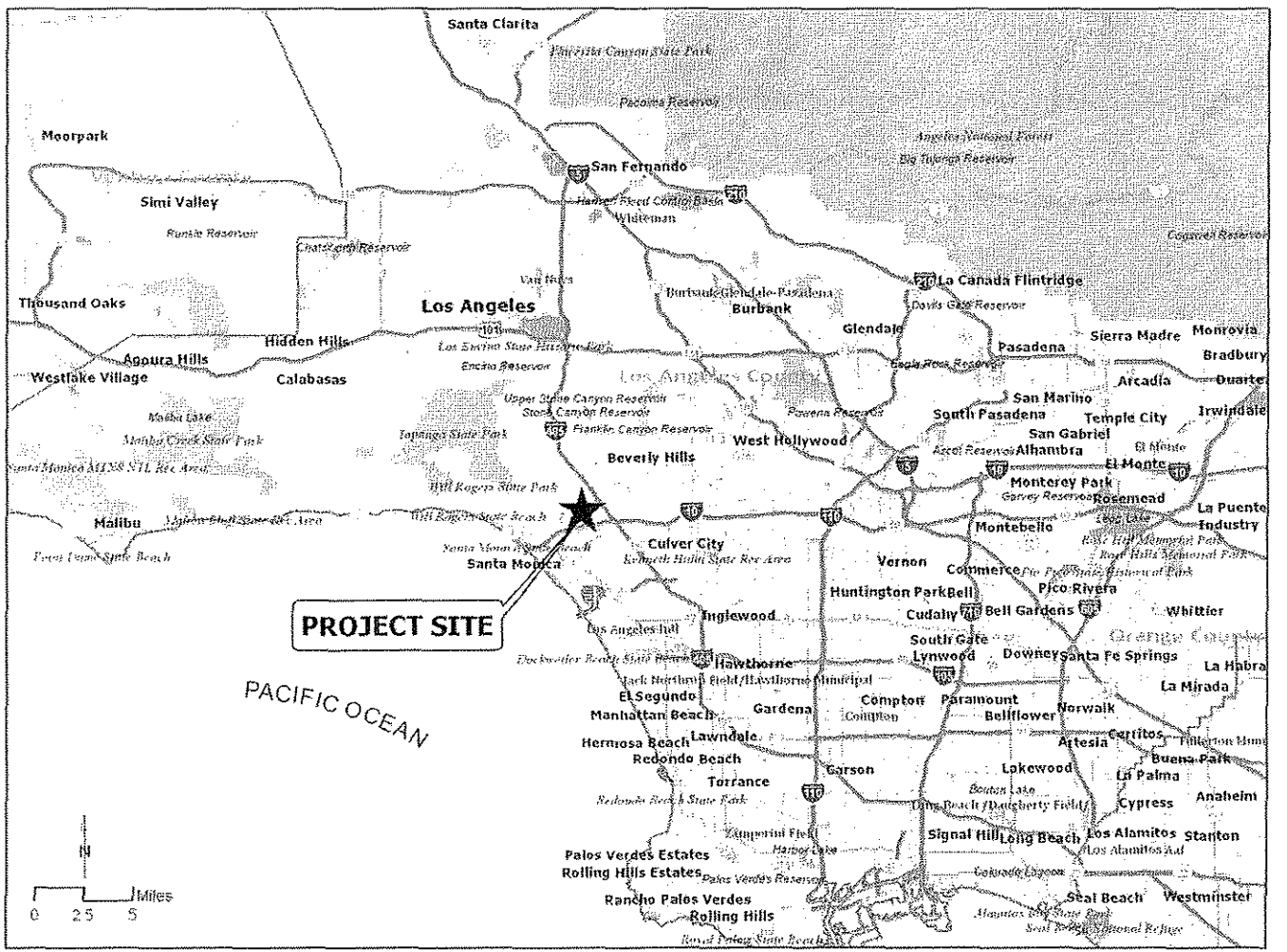
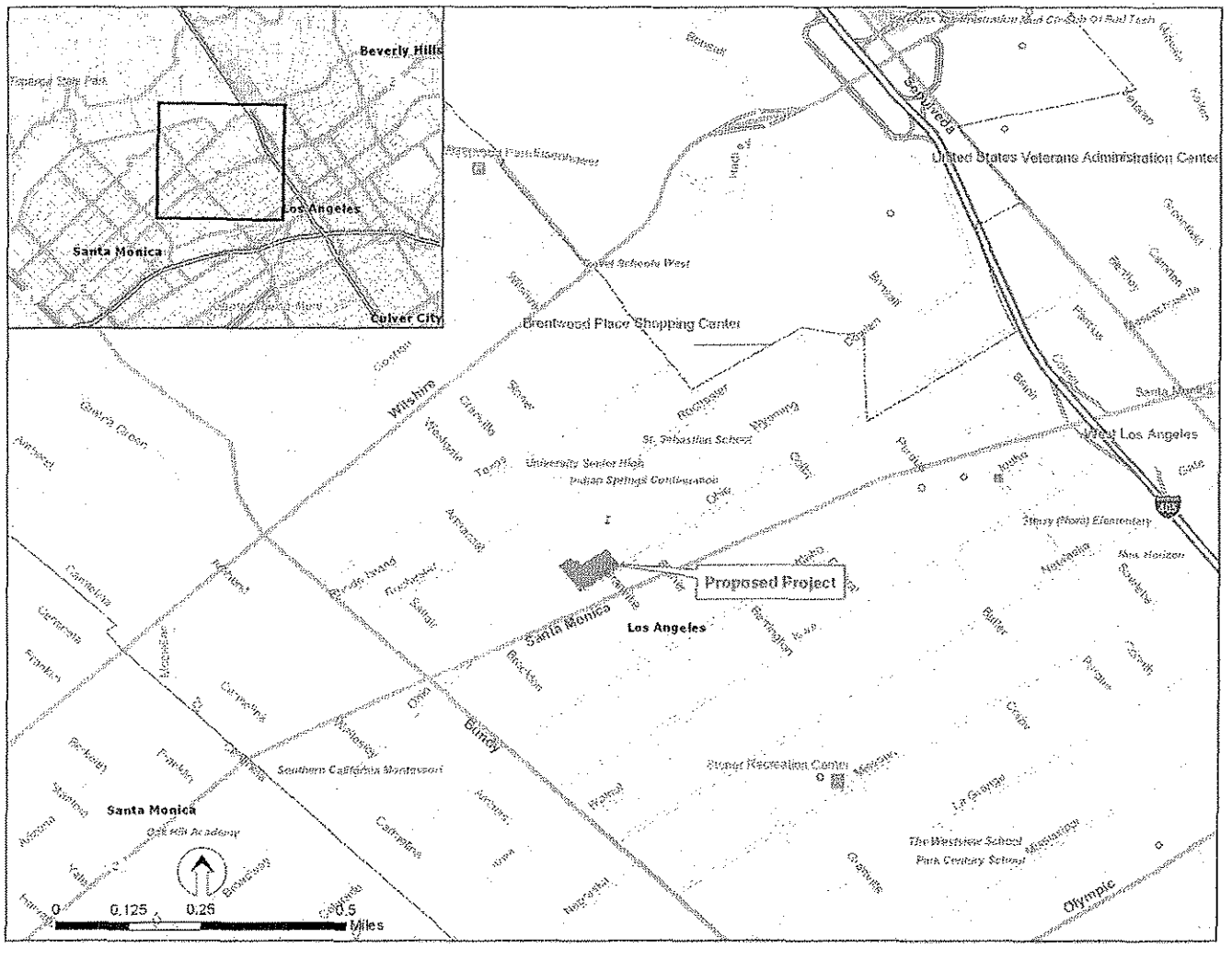


Figure 2-2. Vicinity Location Map



2.4 PROJECT DESCRIPTION

2.4.1 Operational Phase

YMCA Facility and Parking Structure

The Proposed Project would construct a 62,500 square-foot YMCA facility within the University High School campus. The new YMCA facility would include a pool room, weight and fitness center with accompanying locker rooms; multipurpose room/indoor court, lobby area with a community room; classroom and testing/examination areas; lounge, and sections for child watch and school-age child care. A portion of the YMCA facility would be one-story; a second story mezzanine level would be located above the pool room. The YMCA facility would have a barrel roof and be approximately 40-feet in height. This facility would be located adjacent to and west of a University High School gymnasium that was recently constructed.

The Proposed Project also includes construction of a four-level (45-foot tall) parking structure capable of accommodating 181 motor vehicle spaces. The proposed parking structure would be perpendicular to and adjoin the YMCA facility. Direct access from the parking structure to the YMCA facility would be provided. The parking structure would be located adjacent to South Westgate Avenue (see Figure 2-4. Site Plan, and Figure 2-5. Profile Plan).

As noted, the Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts, and four bungalow buildings which are used as portable classrooms and a locker room/restroom. Asphalt surface parking and basketball courts are currently located along Ohio Avenue in the southern portion of the project site. Uses currently occupying the project site would be demolished to accommodate the Proposed Project. The bungalow buildings are no longer used by University High School; thus, no related improvements on campus would be required to accommodate classroom and related uses. The YMCA facility would replace recreational amenities demolished for construction.

Alley and Roadway Vacation

The YMCA is proposing to vacate public right-of-way easement located on the University High School campus. The area proposed to be vacated includes the following: (1) a segment of Granville Avenue, approximately 150 feet in length and 60 feet wide, which continues northwest from the intersection with Ohio Avenue and dead ends within the campus; and (2) the 15-foot wide alley which runs southwest between the terminus of Granville Avenue and South Westgate Avenue. The area to be vacated is depicted on Figure 2-6. Proposed Vacation of Public Right-of-Way. The total area to be vacated is 9,500 square feet. Per the City of Los Angeles Street Vacation Application Requirements, street vacations

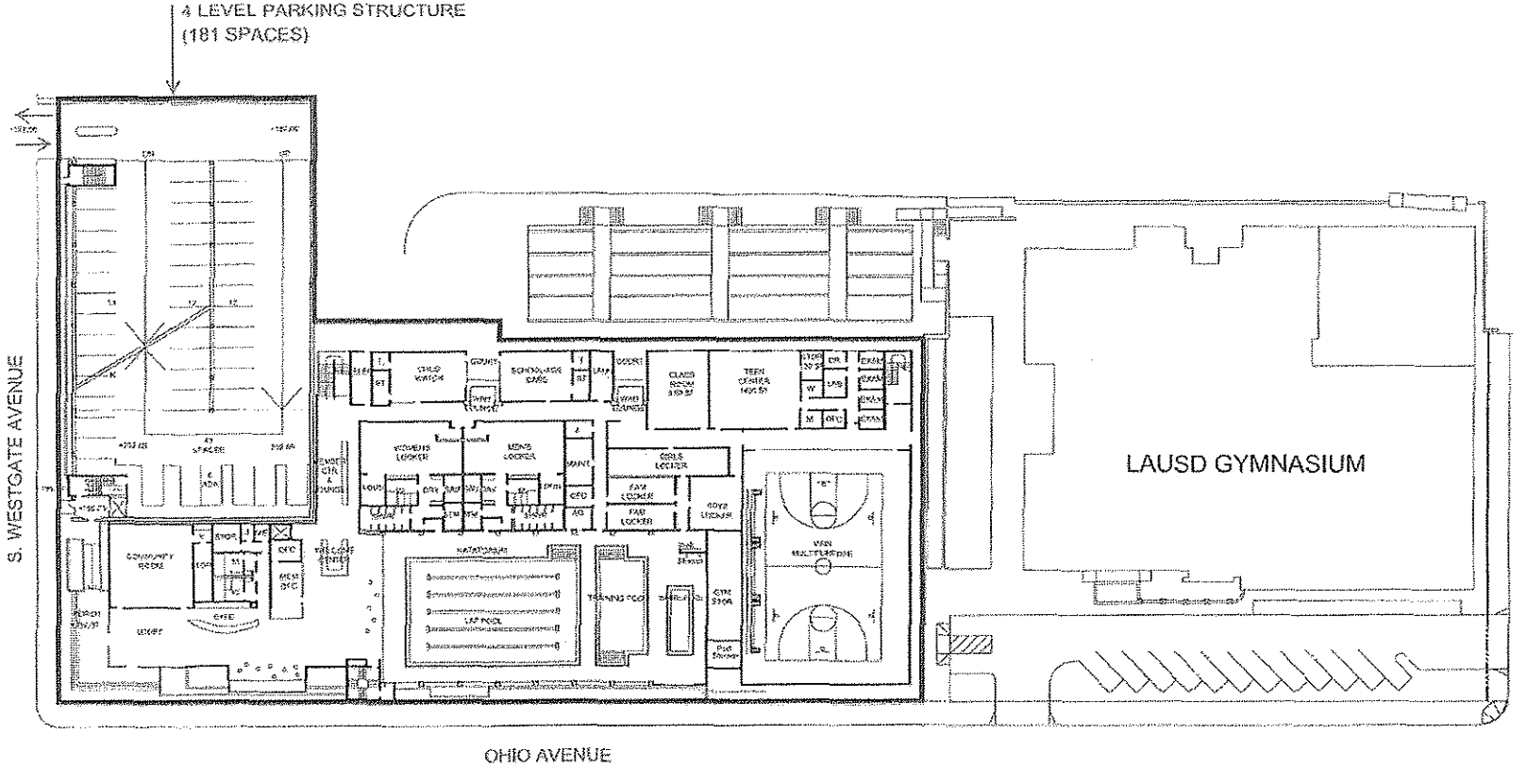
10,000 square feet and less are categorically exempt from CEQA. For the purpose of this evaluation, it is presumed the City of Los Angeles would consider this EIR as appropriate CEQA documentation for the proposed street vacation or file a separate Categorical Exemption for the street vacation element of the Proposed Project. In either case, potential environmental effects are evaluated herein as part of the overall Proposed Project action.

Access and Parking

Pedestrian access to the proposed YMCA facility would be located on South Westgate Avenue and Ohio Avenue. Vehicles would access the proposed parking structure from South Westgate Avenue, north of the pedestrian entrance (see Figure 2-4. Site Plan).

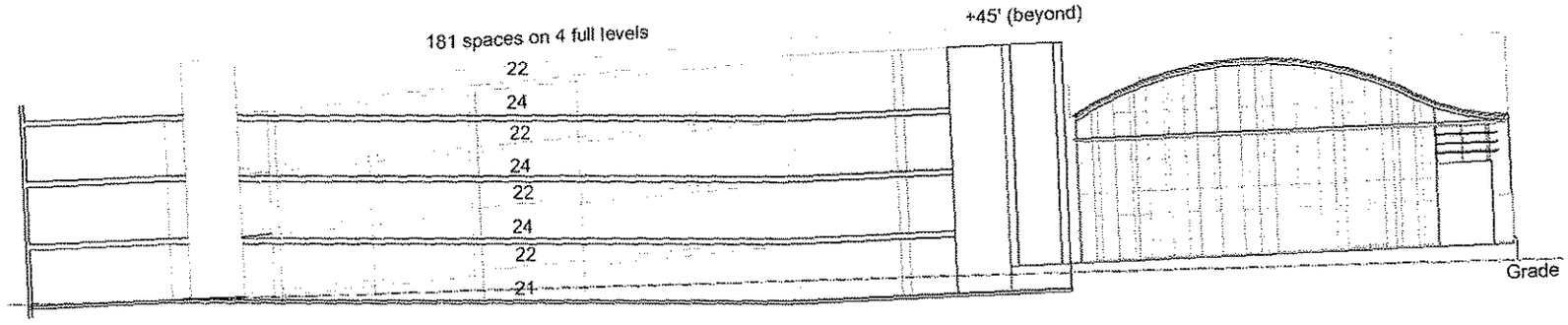
Figure 2-3. Aerial Photo

Figure 2-4. Site Plan



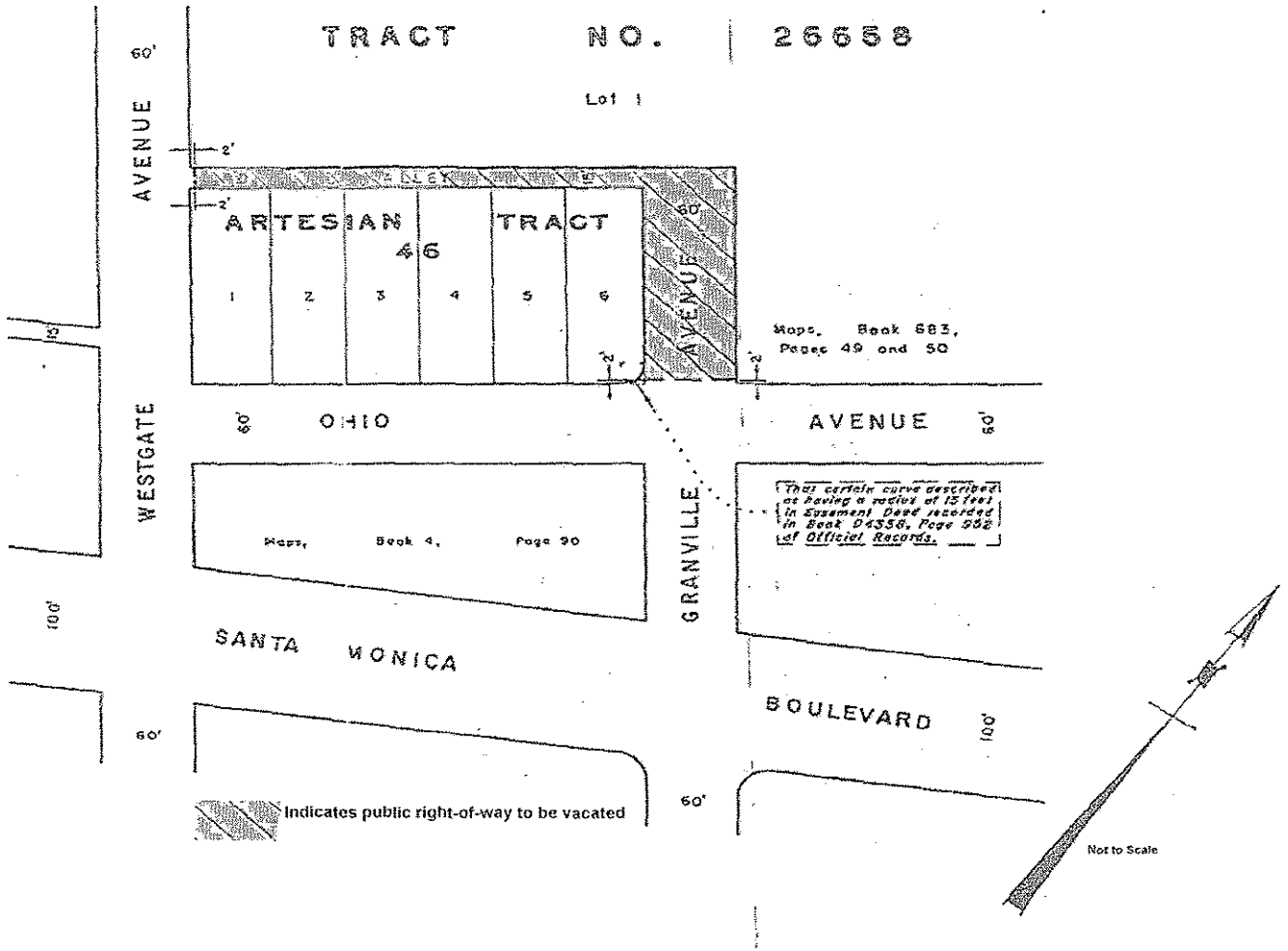
Source: YMCA

Figure 2-5. Profile Plan



Source: YMCA

Figure 2-6. Vacation of Public Right-of-Way



2.4.2 Construction Phase

Construction Phase

Site preparation and demolition for the Proposed Project is anticipated to begin in fall, 2012, and would take approximately 1 month to complete. Construction of the parking garage would occur first to accommodate parking needs. The YMCA facility would then be constructed. Construction of the above-grade parking structure is anticipated to begin in late fall 2012. Completion of the Proposed Project will take approximately 18 months. The Proposed Project is scheduled to open in late winter/spring 2013/2014.

Prior to demolition, buildings proposed for demolition would be tested for asbestos containing material (ACM) and lead-based paint (LBP) to determine the need for special disposal requirements. If ACM or LBP is found, materials would be abated in accordance with Rule 1403 of the South Coast Air Quality Management District (SCAQMD). Uncontaminated materials would be recycled, to the extent feasible, and remaining debris disposed of at an approved landfill.

The construction site and staging areas would be clearly marked and barriers installed to prevent disturbance. It is anticipated that staging of construction equipment and materials storage would occur on the site or immediately adjacent to the site on the school campus. Following testing and abatement activities (if required), existing structures would be demolished. Soil remediation, if necessary, would be completed during this phase in accordance with the California Education Code, and LAUSD Construction Specification 01440 (or a similar protocol for soils testing), and under oversight of the State of California Department of Toxic Substances Control (DTSC), as determined applicable.

Construction would commence with grading and compaction of the site followed by any necessary trenching for utility connections. The footings, buildings, and utilities would then be constructed. It is anticipated that construction of the parking structure would begin first followed by construction of the YMCA facility. The area surrounding the new buildings will be covered with concrete and asphalt and a new curb cut and driveway (parking structure entrance) would be added along South Westgate Avenue. Finally, landscaping, site fencing, and any finishing work would be completed. Construction of the Proposed Project would be phased to minimize disruption to school operations and the community and to accommodate construction staging.

2.4.3 LAUSD Construction Best Management Practices

In accordance with LAUSD Construction Best Management Practices (BMPs), the YMCA shall require its construction contractor to comply with all applicable rules and regulations in carrying out the construction of the Proposed Project. The proposed project will also comply with the following LAUSD Construction BMPs, which are established and refined as part of LAUSD's current construction program:

Water Quality and Hydrology. The YMCA shall require its construction contractor to obtain a National Pollution Discharge Elimination System (NPDES) permit from the Los Angeles Regional Water Quality Control Board (RWQCB) with requirements for discharge, BMPs and Stormwater Pollution Prevention Program (SWPPP). In addition, projects that disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation.

Construction Traffic. The YMCA shall require its construction contractors to submit a construction worksite traffic control plan. The plan shall show the location of any haul routes, hours of operation, protective devices, warning signs, and access to abutting properties.

Construction Air Emissions. The YMCA shall require its construction contractors to comply with all applicable South Coast Air Quality Management District (SCAQMD) rules and regulations in carrying out its project. To reduce the potential for significant hazardous emissions during a removal action, YMCA or its construction contractor shall maintain slow speeds with all vehicles, load impacted soil directly into transportation trucks, minimize soil drop height during dumping activities, cover or further enclose soils on haul trucks, and/or shield exposed soil piles from prevailing winds and rain.

Construction Noise. YMCA shall require the construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction. YMCA shall require its construction contractor to provide advance notice of the start of construction to all noise-sensitive receptors, businesses, and residences adjacent to the project area and include specifically where and when construction activities will occur and provide contact information for filing noise complaints. During construction activities, the construction contractor shall locate portable equipment and shall store and maintain equipment as far as possible from the adjacent residents as feasible.

The YMCA shall require its construction contractors to comply with all applicable noise ordinances of the affected jurisdiction. YMCA shall include the City of Los Angeles noise ordinance in all construction contracts (see Section 3D – Noise).

Hazardous Materials. The YMCA shall require its construction contractor to assess and remediate hazardous materials at the project site. The YMCA shall require its construction contractor to comply with: a) SCAQMD Rule 1166 (Volatile Organic Compounds Emissions (VOC) from Decontamination of Soil) for the removal of VOC-contaminated soils and b) SCAQMD Rule 1403 (Asbestos Removal) for removal of asbestos-containing materials and lead-based paint prior to demolition. If the contractor will be using any hazardous materials such as paints, solvents, adhesives, degreasers, removers, aerosols, gases (e.g. propane, oxygen, acetylene), the YMCA shall also require the construction contractor to properly secure, mark, and store these hazardous materials used on-site and appropriately manage any hazardous wastes generated.

Fire Protection. YMCA shall reduce impacts to fire protection services in connection with new construction projects, by requiring local fire jurisdictions to review and approve site plans.

Sewer Services. The YMCA or its construction contractor shall coordinate with the City of Los Angeles or other appropriate jurisdictions and departments prior to the relocation or upgrade of any sewer facilities, to reduce the potential for disruptions in service.

Waste Management. To ensure optimal diversion of solid resources generated by a project, the YMCA shall require its construction contractors to reuse, recycle, salvage, or dispose of nonhazardous waste materials generated during demolition and/or new construction, as appropriate and feasible, to foster material recovery and reuse and to minimize disposal in landfills.

2.5 REQUIRED PERMITS AND APPROVALS

As required by State CEQA Guidelines, this section provides, to the extent the information is known to LAUSD, a list of the agencies that are expected to use this EIR in their decision-making process and a list of permits and other approvals required to implement the Proposed Project.

2.5.1 Lead Agency Approval

The Final EIR must be certified by LAUSD Board of Education (Board) as to its adequacy in complying with the requirements of CEQA before taking any action on the Proposed Project. The Board will consider the information contained in the EIR in making a decision to approve or deny the project. The analysis in the EIR is intended to provide environmental review for the whole of the Proposed Project, including the planning of the project, demolition, site clearance, excavation and grading of the site, construction of proposed buildings and

appurtenant facilities, and ongoing operation of the school site in accordance with CEQA requirements. As noted, the street vacation may qualify as a Categorical Exemption; however, potential impacts are evaluated as part of the overall project.

2.5.2 Other Required Permits and Approvals

A public agency, other than the lead agency, that has discretionary approval power over a project is referred to as a "Responsible Agency," as defined by CEQA Guidelines. The Responsible Agencies and their corresponding approvals for this project include:

State of California

- Department of General Services, Division of State Architect (DSA): Approval of Site Construction Drawings.

Special Districts

- LAUSD (the Lead Agency): CEQA Review and Approval.

Regional Agencies

- Los Angeles Regional Water Quality Control Board: Issuance of National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit; and issuance of waste discharge requirements (as required).

- Department of Water Resources: General Construction Permit.

City of Los Angeles

- Department of Public Works: Coordination for new sewer connections as required and approval of B permit requests;

- Department of Public Works Bureau of Engineering: Vacation of Public Right-of-Way for a portion of Granville Avenue and 15-foot alley;

- Department of Water and Power (LADWP): Coordination for the extension of service or application for new water and power service;

- Department of Transportation (LADOT): Coordination and approval for off-site improvements or proposed site access changes (such as curb cuts off of South Westgate Avenue); and

- Fire Department (LAFD): Review and approval of site plan for emergency services accessibility and fire flow requirements.

2.5.3 Reviewing Agencies

Reviewing agencies include those agencies that do not have discretionary powers, but that may review the Draft EIR for adequacy and accuracy (Section 15086(a)(3) of the CEQA Guidelines). Potential reviewing agencies include the following:

State of California

- Office of Historic Preservation
- Department of Transportation
- Department of Water Resources
- Department of Conservation
- Department of Fish and Game
- Department of Parks and Recreation
- Native American Heritage Commission
- State Lands Commission
- California Highway Patrol

City of Los Angeles

- Department of City Planning
- Urban Forestry Division
- Police Department
- Bureau of Sanitation
- Waste Water Engineering Services Division
- Department of Water and Power
- Department of Recreation and Parks
- Department of Environmental Affairs

Regional Agencies

- Los Angeles County Metropolitan Transportation Authority
- South Coast Air Quality Management District
- Southern California Association of Governments

2.6 CUMULATIVE SCENARIO

Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. Both CEQA and the CEQA Guidelines require that cumulative impacts be analyzed in an EIR. As set forth in the CEQA Guidelines, the discussion of cumulative

impacts must reflect the severity of the impacts as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, "a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable" (PRC 21083(b)).

According to the CEQA Guidelines:

> Cumulative impacts refer to two or more individual effects that when considered together, are considerable and compound or increase other environmental impacts.
>
> (a) The individual effects may be changes resulting from a single project or a number of separate projects.
>
> (b) The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (Section 15355).

In addition, as stated in CEQA Guidelines, it should be noted that:

> The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable (Section 15064(i)(5)).

Cumulative impact discussions for each issue area are provided in the technical analyses contained within Chapter 3, Environmental Analysis.

As previously stated, and as set forth in the CEQA Guidelines, related projects consist of "closely related past, present, and reasonable foreseeable probable future projects that would likely result in similar impacts and be located in the same geographic area" (Section 15355). Projects that are proposed or under development were identified through research and discussion with the City of Los Angeles and City of Santa Monica Planning Departments.

In general, the study area within which cumulative projects were identified incorporates the area in which the Proposed Project might substantially affect traffic conditions. As shown in Tables 2-1 and 2-2, the development of 64 cumulative projects is anticipated within a 2-mile radius of the Proposed Project site. Tables 2-1 and 2-2 summarize the location, land use, and approximate size of each cumulative project. Figures 2-7 and 2-8 illustrate their approximate location.

Table 2-1. Cumulative Projects in City of Los Angeles

Size		Description	Address/Location
2,800	sf	24-hour Convenience Market	900 Gayley Avenue
7,000	sf	Specialty Retail	1130 Gayley Avenue
48	du	Apartment	
62	du	Apartment	11771 Montana Avenue
30,000	sf	Retail	11711 Gorham Avenue
3,900	sf	Sit-Down Restaurant	11906-11920 San Vicente Boulevard
58,500	sf	Retail	11975 San Vicente Boulevard
10,500	sf	Restaurant	
8,000	sf	Office	
60	du	Condominium	10777 Wilshire Boulevard
250	rm	Hotel	10955 Wilshire Boulevard
6,510	sf	Specialty Retail	10955 Wilshire Boulevard
120,900	sf	Medical Office	11600-11620 Wilshire Boulevard
120,200	sf	Office	
49	du	Condominium	11669-77 Wilshire Boulevard
41,000	sf	Office	11669-77 Wilshire Boulevard
8,000	sf	Retail	11669-77 Wilshire Boulevard
45	du	Condominium	1777 Westwood Boulevard
9,000	sf	Retail	
35,000	sf	Office	10700 Santa Monica Boulevard
9,000	sf	Retail	

Notes:

sf = Square Feet
du = Dwelling Units
rm = Rooms
vfp = Vehicle Fueling Positions
stu = Students

Source: Crain & Associates, 2012.

Table 2-1. Cumulative Projects in City of Los Angeles (continued)

Size		Description	Address/Location
47	du	Condominium	10857 Santa Monica Boulevard
16,500	sf	Retail	
68	du	Condominium	11567 Santa Monica Boulevard
10,000	sf	Retail	
53,200	sf	Supermarket	11660 Santa Monica Boulevard
28	du	Condominium	11857-11859 Santa Monica Boulevard
4,700	sf	Retail	
93	du	Condominium	11900 Santa Monica Boulevard
26,000	sf	Retail	
3	du	Condominium	1929 Beloit Avenue
7,600	sf	Office	2142 Pontius Avenue
84,735	sf	Medical Office	12333 W. Olympic Boulevard
8,817	sf	Retail	12333 W. Olympic Boulevard
1,021	sf	Supermarket	12333 W. Olympic Boulevard
177	du	Condominiums	12333 W. Olympic Boulevard
208	du	Senior Residential Units	12333 W. Olympic Boulevard
538	du	Apartment	11122 W. Pico Boulevard
266,000	sf	Retail	
95	du	Condominium	12301 W. Pico Boulevard
48	du	Apartment	2900 S. Sepulveda Boulevard
1,500	sf	Office	
120	stu	Private School	2920 S. Sepulveda Boulevard

Notes:

sf = Square Feet
du = Dwelling Units
rm = Rooms
vfp = Vehicle Fueling Positions
stu = Students

Source: Crain & Associates, 2012

Table 2-2. Cumulative Projects in City of Santa Monica

Size		Description	Address/Location
6	du	Condominium	1434 14th St.
5,776	sf	Media Production Office Space	1551 14th St.
30	du	Apartment	1511 15th St.
45,000	sf	Outpatient Surgery Center	1217-1231 16th St.
10	du	Condominium	1803-07 16th St.
5	du	Condominium	919 17th St.
7	du	Condominium	1807 17th St.
6	du	Condominium	1949 17th St.
18	odu	Senior Apartment	1753 18th St.
5	du	Condominium	811 19th St.
8	du	Condominium	917 19th St.
5	du	Condominium	1119 20th St.
5	du	Condominium	1818 20th St.
6	du	Condominium	853 21st St.
19	du	Condominium	2002 21st St.
470,000	sf	Hospital	1328 22nd St.
600,000	sf	Creative/Media Production	1681 26th St.
350	du	Condominium	
80,000	sf	Specialty Retail	
8	du	Condominium	2323 28th St.

Notes:

sf = Square Feet
du = Dwelling Units
rm = Rooms
vfp = Vehicle Fueling Positions
stu = Students

Source: Crain & Associates, 2012

Table 2-2. Cumulative Projects in City of Santa Monica (continued)

Size		Description	Address/Location
6	du	Condominium	2401 28th St.
32	du	Condominium	1502 Broadway
33	du	Apartment	2602 Broadway
16	du	Condominium	1940 Cloverfield Bl.
94,500	sf	Creative/Media Production	2834 Colorado Ave.
75,500	sf	Administrative Office	2834 Colorado Ave.
9,000	sf	Community-Serving Specialty Retail	2834 Colorado Ave.
153,000	sf	Entertainment/Post Production Facility	2834 Colorado Ave.
300,000	sf	Post Production	2848 Colorado Ave.
170	du	Multifamily housing	
227	du	Condominium	2930 Colorado Ave.
166	du	Apartment	
105,000	sf	Post Production	
12,000	sf	Retail	
6	du	Condominium	1171 Franklin St.
45	du	Condominium	1943-59 High Pl.
65,000	sf	Elementary School	2425 Kansas Ave.
6	du	Condominium	1920 Montana Ave.
545	du	Residential	3025 Olympic Bl.
75,000	sf	Post Production	
5,000	sf	Retail	
320	stu	Private High School	3131 Olympic Bl.
180	stu	Private Middle School	3131 Olympic Bl.
135	stu	Private Elementary School	3131 Olympic Bl.
70	stu	Preschool	3131 Olympic Bl.

Notes:

sf = Square Feet
du = Dwelling Units
rm = Rooms
vfp = Vehicle Fueling Positions
stu = Students

Source: Crain & Associates, 2012

Table 2-2. Cumulative Projects in City of Santa Monica (continued)

Size		Description	Address/Location
6,000	sf	Educational Partners Office Space	3131 Olympic Bl.
350	st	Performing Arts Theater	3131 Olympic Bl.
6,755	sf	Gymnasium	3131 Olympic Bl.
2,396	sf	Dance/Yoga Classrooms	3131 Olympic Bl.
33	du	Affordable Housing	2802 Pico Bl.
2,399	sf	Retail	
600	sf	Retail	
700	sf	Retail	3205 Pico Bl.
1	du	Residential	
32	du	Apartment	1802 Santa Monica Bl.
9,400	sf	Commercial	
9,400	sf	Office	1630 Stewart St.
22	du	Residential	
28,422	sf	Corporate Headquarters	1800 Stewart St.
75,847	sf	Research and Development	1800 Stewart St.
49,386	sf	Manufacturing	1800 Stewart St.
47	du	Apartment	2345-49 Virginia Ave. & 1942-54 High Pl.
30	du	Condominium	2300 Wilshire Bl.
25,000	sf	Retail	
11,595	sf	Supermarket	2919-23 Wilshire Bl.
26	du	Apartment	2919-23 Wilshire Bl.
6	du	Condominium	1319 Yale St.

Notes:

sf = Square Feet
du = Dwelling Units
rm = Rooms
vfp = Vehicle Fueling Positions
stu = Students

Source: Crain & Associates, 2012

Figure 2-7. Cumulative Projects in City of Los Angeles

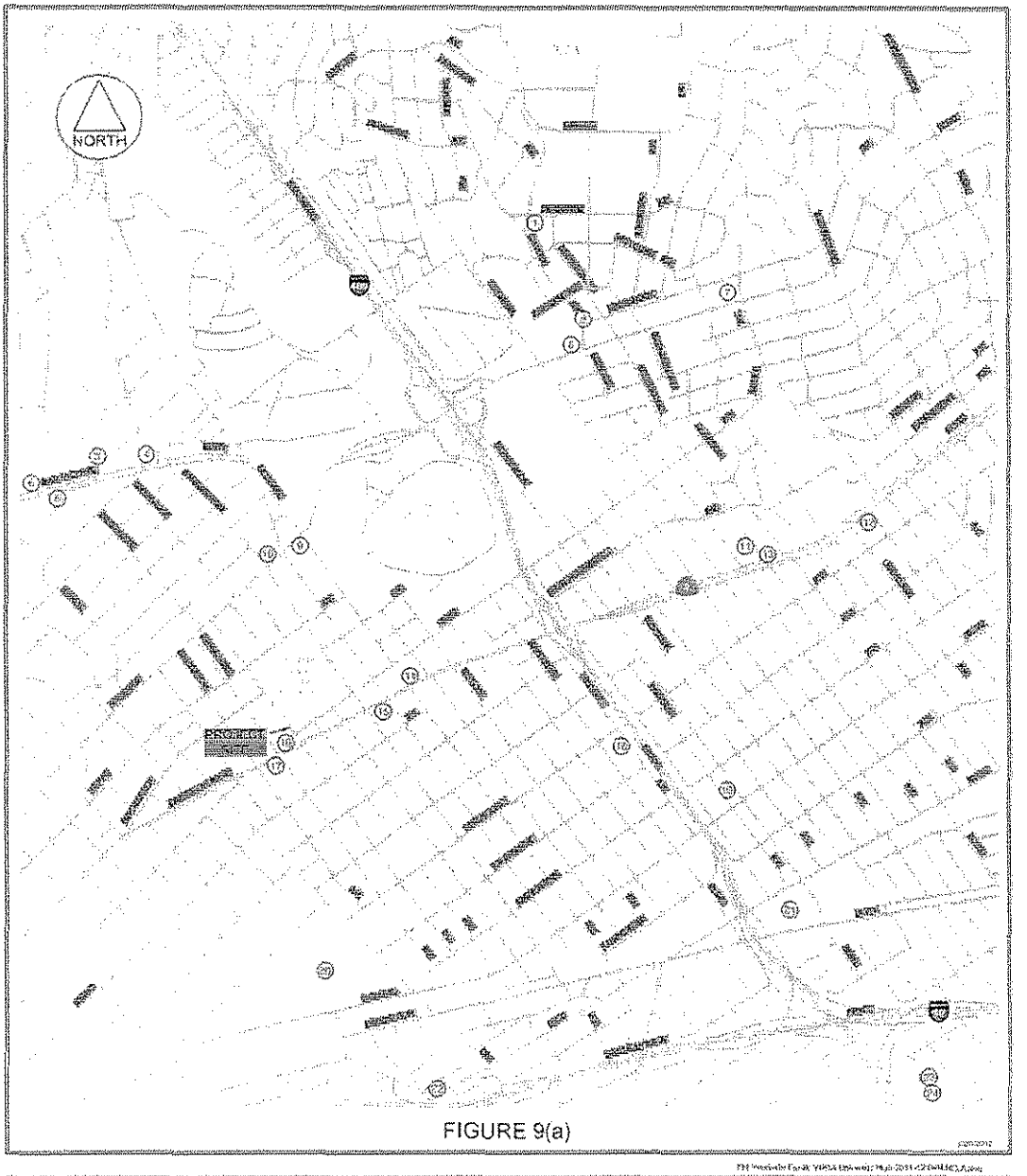


Figure 2-8. Cumulative Projects in City of Santa Monica

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It is noted that cumulative impacts analyzed in this EIR likely represent a "worst-case" scenario for the following reasons:

- Not all of the related projects will be approved and/or built;
- Impact projections for related projects would likely be, or have been, subject to unspecified mitigation measures, which would reduce potential impacts; and
- Many related projects are expressed in terms of gross square footage or are conceptual plans such as master plans that assume complete development; in reality, such projects may be smaller (i.e., net new development) because of the demolition or removal of existing land uses resulting from development of the related project.

2.7 AREAS OF CONTROVERSY

Section 15123 (b)(2) of the CEQA Guidelines requires that an EIR contain a discussion of the areas of controversy known to the lead agency, including issues raised by agencies and the public. Public comments were solicited from agencies and individuals during the 30-day scoping process, which began on March 24, 2011, and ended on April 22, 2011.

Comment letters were received from two agencies during the public review period; the South Coast Air Quality Management District (SCAQMD), and the Native American Heritage Commission. A third comment letter from the County of Los Angeles Fire Department was received shortly following the review period. The following summarizes the comments received and the potential areas of controversy:

- Air quality impacts from construction and operation of the new facility (SCAQMD);
- Cultural resource impacts to subsurface artifacts (Native American Heritage Commission); and
- Availability of water supplies for fire fighting, local/regional access, fire code and ordinances, and other environmental concerns (County of Los Angeles Fire Department).

Chapter 3. Environmental Analysis

3.1 ENVIRONMENTAL ISSUES ADDRESSED

An Initial Study was prepared for the Proposed Project and made available for public review and comment on March 24, 2011 (see Appendix A). Using the findings of the IS, LAUSD determined that an EIR would be required for the Proposed Project. LAUSD used the IS, as well as agency and public input received during the required 30-day comment period, to determine the scope of the evaluation for this EIR, which addresses the following environmental issues:

- Section 3A: Air Quality
- Section 3B: Cultural Resources
- Section 3C: Greenhouse Gas Emissions
- Section 3D: Noise
- Section 3E: Public Services
- Section 3F: Transportation and Traffic
- Section 3G: Energy

Sections 3A through 3G provide a detailed discussion of the environmental setting, applicable project design features, potential impacts associated with the Proposed Project, cumulative impacts, and mitigation measures designed to avoid, minimize or reduce significant impacts.

3.2 ORGANIZATION OF ENVIRONMENTAL ANALYSIS

To assist the reader in comparing information about the various environmental issues, each chapter contains the following information:

- Introduction,
- Environmental Setting,
- Applicable Regulations,
- Environmental Impacts and Mitigation
    - Methodology

- Criteria for Determining Significance
- Project Impacts
  - Mitigation Measures
  - Residual Impacts
- Cumulative Impacts
  - Mitigation Measures
  - Residual Impacts.

3.3 TERMINOLOGY USED IN THIS ANALYSIS

For each threshold listed in the EIR, a level of significance determination for each impact is provided. Impacts are categorized in the following manner:

- A designation of *no impact* is assigned when no adverse changes in the environment would occur;
- A *less-than-significant impact* would cause no substantial adverse change in the environment;
- A *less-than-significant impact with mitigation incorporated* is one that would have a substantial adverse impact on the environment but could be reduced to a less-than-significant level with incorporation of mitigation measure(s); and
- A *potentially significant impact* would cause a substantial adverse impact on the environment, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level.

Section 3A. Air Quality

3A.1 INTRODUCTION

This air quality section addresses the impacts of the Proposed Project on ambient air quality and the exposure of people, especially individuals sensitive to air pollution, to unhealthful air pollutant concentrations. Air pollutants of concern include the ozone (O_3) precursor emissions reactive organic compounds (ROC) and oxides of nitrogen (NO_X); carbon monoxide (CO) and particulate matter ($PM_{2.5}$ and PM_{10}). This section analyzes the type and quantity of emissions that would be generated by the construction and operation of the Proposed Project and proposes mitigation measures to reduce environmental impacts determined to be significant. An *Air Quality Technical Memorandum* was prepared for the Proposed Project by Air & Noise Logic (2012) and is attached to this report as Appendix B.

3A.2 ENVIRONMENTAL SETTING

3A.2.1 Regional Climate

Air quality is affected by both the amount and location of pollutant emissions and by meteorological conditions that influence movement and dispersal of pollutants. Atmospheric conditions such as wind speed, wind direction, and air temperature gradients, along with local topography, provide the link between air pollutant emissions and air quality.

The Proposed Project lies within the South Coast Air Basin (SCAB). The SCAB incorporates approximately 12,000 square miles within four counties – all of Orange County, and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties -- including some portions of what was previously known as the Southeast Desert Air Basin. The distinctive climate of the SCAB is determined by its terrain and geographic location. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the southwest and high mountains around its remaining perimeter. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds.

The vertical dispersion of air pollutants in the SCAB is hampered by the presence of persistent temperature inversions. High-pressure systems, such as the semi-

permanent high-pressure zone in which the SCAB is located, are characterized by an upper layer of dry air that warms as it descends. This upper layer restricts the mobility of cooler marine-influenced air near the ground surface, and results in the formation of subsidence inversions. Such inversions restrict the vertical dispersion of air pollutants released into the marine layer and, together with strong sunlight, can produce worst-case conditions for the formation of photochemical smog.

According to the South Coast Air Quality Management District, the atmospheric pollution potential of an area is largely dependent on winds, atmospheric stability, solar radiation, and terrain. The combination of low wind speeds and low inversions produces the greatest concentration of air pollutants. On days without inversions or days of winds averaging over 15 mph, smog potential is greatly reduced.

3A.2.2 Local Climate

Los Angeles has a semi-arid Mediterranean climate with mild winters and hot, dry summers. The average annual precipitation is 14.8 inches per year with most occurring between November and April. Temperatures range from a low of 40 F to a high of 110 F. The average daily temperatures range from 54 F to 73 F. The prevailing wind is generally from west to east.

3A.2.4 Existing Local Air Quality

The South Coast Air Quality Management District (SCAQMD) monitors air quality throughout the SCAB at various monitoring stations. The Proposed Project site is located within Source Receptor Area (SRA) Number 2. The most recent published data for SRA 2 is presented in Table 3A-1. This data indicates that the baseline air quality conditions in the project area include occasional events of very unhealthful air. However, the frequency of smog alerts has dropped significantly in the last decade. Atmospheric concentrations of ozone and particulate matter are the two most significant air quality concerns in the project area. Ozone levels have also decreased in the last few years. There are approximately one-fifth the number of ozone violations currently than there were in 2000.

Table 3A-1. Source Receptor Area (SRA) 2, Air Quality Monitoring Summary – 2009 (Source: Air & Noise Logic, 2012)

	Pollutant/Standard Source: SCAQMD	2009
No. Days Exceeded	**Ozone:**	
	Health Advisory - 0.15 ppm	0
	California Standard:	
	1-Hour - 0.09 ppm	6
	8-Hour - 0.070 ppm [a]	5
	Federal Primary Standards:	
	1-Hour - 0.12 ppm	1
	8-Hour - 0.08 ppm (0.075 ppm)[a]	3
	Max 1-Hour Conc. (ppm)	0.131
	Max 8-Hour Conc. (ppm)	0.094
No. Days Exceeded	**Carbon Monoxide:**	
	California Standard:	
	1-Hour - 20 ppm	0
	8-Hour - 9.0 ppm	0
	Federal Primary Standards:	
	1-Hour - 35 ppm	0
	8-Hour - 9.0 ppm	0
	Max 1-Hour Conc. (ppm)	2
	Max 8-Hour Conc. (ppm)	1.5
No. Days Exceeded	**Nitrogen Dioxide:**	
	California Standard:	
	1-Hour - 0.18 ppm	0
	Federal Standard:	
	Annual Arithmetic Mean (ppm) [b]	0.017
	Max. 1-Hour Conc. (ppm)	0.08
No. Days Exceeded	**Sulfur Dioxide:**	
	California Standards:	
	1-Hour – 0.25 ppm	0
	24-Hour – 0.04 ppm	0
	Federal Primary Standards:	
	24-Hour – 0.14 ppm	0
	Annual Standard – 0.03 ppm [c]	No
	Max. 1-Hour Conc. (ppm)	0.002*
	Max. 24-Hour Conc. (ppm)	0.006*
No. Days Exceeded	**Suspended Particulates (PM10):**	
	California Standards:	
	24-Hour - 50 $\mu g/m^3$	1*
	Federal Primary Standards:	
	24-Hour – 150 $\mu g/m^3$	0*
	Annual Arithmetic Mean ($\mu g/m^3$) [d]	25.4*
	Max. 24-Hour Conc. ($\mu g/m^3$)	52*
No. Days Exceeded	**Suspended Particulates (PM2.5):**	
	California & Federal Primary Standards:	
	24-Hour – 65 $\mu g/m^3$ (35$\mu g/m^3$) [e]	6**
	Annual Arithmetic Mean ($\mu g/m^3$) [f]	13.0**
	Max. 24-Hour Conc. ($\mu g/m^3$)	63.0**

Note: -- No data available. * indicating that data was obtained from the Southwest Coastal Los Angeles County monitoring station. ** indicating that data was obtained from the South Coastal LA County 1
2004 is first year of SCAQMD records for state 8-hour Ozone standard. Federal 8-hour ozone standard 0.075 ppm effective May 27, 2008.

3A.2.5 Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others based on the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardio-respiratory diseases.

Residential areas are also considered to be sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, as the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the public.

There are four areas surrounding the Proposed Project site that represent the closest existing sensitive receptors that could be affected by construction activity:

- Site 1 – Residential uses (multi-family) along South Westgate Avenue;
- Site 2 – Commercial uses along Ohio Avenue;
- Site 3 – University High School On-site Classroom (400 feet northwest of the Project site); and
- Site 4 – University High School On-site Classroom (600 feet northeast of the Project site).

3A.3 APPLICABLE REGULATIONS

The federal Clean Air Act (CAA) was passed in 1963 by the U.S. Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including non-attainment requirements for areas not meeting national ambient air quality standards (NAAQS) and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the U.S.

In 1988, the state legislature passed the California Clean Air Act (CCAA), which established California's air quality goals, planning mechanisms, regulatory

strategies, and standards of progress for the first time. The CCAA provides the state with a comprehensive framework for air quality planning regulation. The CCAA requires attainment of state ambient air quality standards by the earliest practicable date. Attainment plans are required for air basins in violation of the state ozone, carbon monoxide, sulfur dioxide, or nitrogen dioxide standards. Preparation of and adherence to attainment plans are the responsibility of the local air pollution districts or air quality management districts.

The state and federal air quality standards are listed in Table 3A-1. As indicated, the averaging times for the various air quality standards (the duration over which they are measured) range from 1 hour to an annual basis. The standards are read as a concentration, in parts per million (ppm), or as a weighted mass of material per a volume of air, in milligrams or micrograms of pollutant per cubic meter of air (mg/m^3 and $\mu g/m^3$, respectively).

In general, an area is designated as attainment for a specific pollutant if the concentrations of that air contaminant do not exceed the standard. Likewise, an area is designated as non-attainment for an air contaminant if that standard is violated. Where not enough ambient data are available to support designation as either attainment or non-attainment, the area would be designated as unclassified. Unclassified areas are normally treated the same as attainment areas for regulatory purposes. An area can be attainment for one air contaminant while non-attainment for another, or attainment for the federal standard and non-attainment for the state standard for the same pollutant. The entire area within the boundaries of an air district or air basin is usually evaluated to determine the air district's attainment status. The boundaries of the Proposed Project are wholly within the SCAB. Table 3A-2 shows the area designation status of the SCAB for each criteria pollutant for both the federal and state ambient air quality standards.

Table 3A-2. Attainment Status for Los Angeles County Portion of SCAB

Pollutants	Federal Classification	State Classification
1-Hour Ozone	—	Non-Attainment
8-Hour Ozone	Non-Attainment	Non-Attainment
PM_{10}	Non-Attainment	Non-Attainment
$PM_{2.5}$	Non-Attainment	Non-Attainment
CO	Attainment	Attainment
NO_2	Attainment	Non-Attainment
SO_2	Attainment	Attainment

Note: CO = carbon monoxide; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter less than 10 micrograms in diameter; $PM_{2.5}$ = particulate matter less than 2.5 micrograms in diameter.

Source: Air & Noise Logic, 2012

The portion of the SCAB within which the Proposed Project is located is designated as a non-attainment area for NO_2 under state standards, and as a non-attainment area for ozone, PM-10, and PM-2.5 under both state and federal standards. Concentrations of attainment pollutants within the SCAB are expected to continue to decrease from current concentration levels as control measures and strategies to improve air quality are developed and implemented.

The SCAQMD and the Southern California Association of Governments (SCAG) have responsibility for preparing the Air Quality Management Plan (AQMP), which addresses federal and state CAA requirements. The AQMP details goals, policies, and programs for improving air quality and establishes thresholds for daily operation emissions. Environmental review of individual projects within the region must demonstrate whether daily construction and operational emissions thresholds established by the SCAQMD would be exceeded, and the number or severity of existing air quality violations that would be increased.

The most recent AQMP (2007) addresses CCAA requirements that are intended to bring the SCAQMD into compliance with state air quality standards. The AQMP focuses on the reduction of O_3 precursors and particulate (PM_{10} and $PM_{2.5}$) emissions through public education, vehicle and fuels management, transportation controls, indirect source controls, and stationary source controls programs.

Emissions that would result from the Proposed Project are subject to the rules and regulations of the SCAQMD. Rules and regulations of this agency are designed to achieve defined air quality standards that are protective of public health. To that purpose, they limit the emissions and the permissible impacts of emissions from projects, and specify emission controls and control technologies for each type of emitting source to ultimately achieve the air quality standards. There are a number of SCAQMD rules and regulations that apply to the

construction and operation of the Proposed Project. SCAQMD Rule 403 (Fugitive Dust) applies to any activity or man-made condition capable of generating fugitive dust emissions. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites.

3A.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3A.4.1 Methodology

Air pollutant emissions from construction and operational activities were calculated using the most current emission factors and methods and compared to significance thresholds. The analysis of construction impacts assumed an 18-month construction schedule, which includes demolition and removal of four bungalow buildings, site grading, construction and application of architectural coating. The CalEEMod version 2011.1.1 computer program was used to perform the construction and operational emission calculations.

CalEEMod version 2011.1.1 uses construction information regarding demolition quantities, grading and construction scheduling to calculate pollutant concentrations. The model assumes a mix of construction equipment based on the project size. The thresholds summarized in Table 3A-3 and Table 3A-4 were used to determine construction and project level operational impacts of the Proposed Project. The criteria are based on the SCAQMD CEQA Air Quality Handbook.

Table 3A-3. Air Quality Significance Thresholds

	SCAQMD Mass Daily Thresholds	
Pollutant	**Construction**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day

Source: Air & Noise Logic, 2012

Table 3A-4. Ambient Air Quality Thresholds:

NO_2	Project is significant if it causes or contributes to an exceedance of the following attainment standards:
1-hour average	0.17 ppm (state)
annual average	*0.03 ppm (state)*
PM_{10}	
24-hour average	10.4 µg/m^3 (construction) –&– 2.5 µg/m3 (operation)
annual average	*1.0 µg/m^3*
$PM_{2.5}$	
24-hour average	10.4 µg/m^3 (construction) –&– 2.5 µg/m3 (operation)
CO	
1-hour average	20 ppm (state)
8-hour average	9.0 ppm (state/federal)

Source: Air & Noise Logic, 2012; Thresholds also shown in Table 3A-1 above.

Construction and operational impacts would occur if predicted air quality emissions exceed the levels in Table 3A-4. An operational impact might also occur if an intersection within one-quarter mile of the project exceeds the following:

- The state 1-hour CO threshold of 20 ppm or the 8-hour CO threshold of 9.0 ppm or,
- The incremental increase due to the Proposed Project is equal to or greater than 1.0 ppm (1,150 µg/m^3) for the state 1-hour CO standard or 0.45 ppm (518 µg/m^3) for the 8-hour CO standard.

The intersection of Wilshire Boulevard and Barrington Avenue was used for the CO hot spot analysis screening performed for the Proposed Project. This intersection is representative of the worst case intersection in the study area because it has the worst Level of Service (LOS) during simulated 2011 and 2014 with Project conditions. LOS describes the quality of traffic flow. Therefore, if the intersection with the highest worst traffic conditions (i.e., congestion) does not exceed the threshold criteria, intersections with lower volumes or better operating conditions, would in-turn not violate the standard.

Lastly, an analysis of localized mass emissions for NO_X, CO, PM_{10} and $PM_{2.5}$ was conducted for the Proposed Project to determine potential construction related impacts. Construction related impacts were evaluated based on South Coast Air Quality Management District's Localized Significance Threshold (LST) Methodology. The LST thresholds are estimated for each SRA using the maximum daily disturbed area (in acres) and the distance of the Proposed Project to the nearest sensitive receptors (in meters). The closest receptor distance on the LST look-up tables is 25 meters. According to the LST Methodology, projects with boundaries closer than 25 meters to the nearest receptor should use LST's for receptors located at 25 meters. Site 1 – Residential (multi-family) apartments along South Westgate Avenue are located within 25 meters (82 feet west) of the project site. Therefore a receptor distance of 25 meters was used in the LST evaluation. Locally significant impacts would occur for localized project emissions if construction and operational emissions would exceed LSTs. The LSTs for Source Receptor Area 2 are summarized below in Table 3A-6.

Table 3A-5. Localized Significance Thresholds

Pollutant	Construction					Operational				
	82ft (25m)	164ft (50m)	328ft (100m)	656ft (200m)	1640ft (500m)	82ft (25m)	164ft (50m)	328ft (100m)	656ft (200m)	1640ft (500m)
NOx	147	143	156	186	262	147	143	156	186	262
CO	827	1213	1695	2961	8446	827	1213	1695	2961	8446
PM10	6	19	34	64	154	2	5	9	16	37
PM2.5	4	5	10	21	82	1	2	3	6	20

Notes:
Based on SRA 2 and a 2-acre site
Source: Air & Noise Logic, 2012

3A.4.2 Criteria for Determining Significance

The criteria used to determine the significance of Proposed Project impacts on air quality are based on the model Initial Study checklist in Appendix G of the CEQA Guidelines and thresholds shown in Tables 3A-3 to 3A-5. In the IS/NOP, it

was determined that the Proposed Project may result in potentially significant impacts relating to air quality if it would:

- violate any air quality standard or contribute substantially to an existing or projected air quality violation,
- result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors),
- create or contribute to a non-stationary source "hotspot" (primarily carbon monoxide), or
- expose sensitive receptors to substantial pollutant concentrations.

3A.4.3 Project Impacts

The environmental impact analysis presented below is based on determinations made in the IS/NOP for issues found to be potentially significant or identified by reviewing agencies, organizations, or individuals commenting on the Initial Study that made a reasonable argument that the issue was potentially significant (see Responses to NOP/Initial Study, Appendix A).

Impact A-1: Violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Less than significant impact.

Table 3A-6 summarizes the daily emissions associated with the construction of the Proposed Project. A comparison of the daily emissions to the air quality standards in Table 3A-3 indicate that construction and operation of the Proposed Project would emit VOC/ROG levels from 3 to 7 pounds per day, CO levels from 14 to 32 pounds per day, NO_X levels from 25 to 51 pounds per day, SO_X levels from 0 to 0.5 pounds per day, PM_{10} levels from 2 to 7 pounds per day, and $PM_{2.5}$ from 2 to 5 pounds per day. A comparison to the significance thresholds indicates that construction emissions are below the SCAQMD significance thresholds.

Table 3A-6. Summary of Construction Activity

Construction Project/Activity	EMISSIONS (POUNDS PER DAY)					
	VOC	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Summary of Construction Activity						
Demolition	6.85	50.58	31.09	0.05	3.76	3.31
Site Preparation	2.94	24.06	13.47	0.02	6.57	4.09
Site Grading	3.54	28.32	16.27	0.03	6.29	3.94
Building Construction	5.32	27.60	18.66	0.03	1.94	1.94
Architectural Coating	3.87	24.11	16.34	0.03	2.00	2.00
Daily Threshold for Construction Emissions	75	100	550	150	150	55
Maximum Emissions*	6.85	50.58	31.09	0.05	6.57	4.09
Significant Impact?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
*Maximum emissions is the greatest of all activities expected to occur.
Source: Air & Noise Logic, 2013., CalEEMod, unmitigated output

Table 3A-7 summarizes the daily emissions associated with the operation of the Proposed Project. Operational emissions were calculated for both summer and winter. Operational emissions are approximately 11 pounds per day for VOC/ROG, 67 pounds per day for CO, 19 pounds per day for NO_X, less than one pound per day for SO_X, 13 pounds per day for PM_{10} and 1 pound per day for $PM_{2.5}$. A comparison of the emissions to the operational thresholds indicates that emissions would be below the threshold.

Table 3A-7. Daily Project Operation Emissions

	Peak Daily Project Operation Emissions (lbs/day)					
	VOC	**NOx**	**CO**	**SO2**	**PM-10**	**PM-2.5**
SCAQMD Daily Thresholds	55	55	550	150	150	55
Total	10.87	18.83	66.88	0.11	12.97	0.85
Exceeds Threshold?	**No**	**No**	**N\o**	**No**	**No**	**No**

Notes:
Table depicts Winter emissions (worst-case) as calculated by CalEEMod.

Source: Air & Noise Logic, 2012

Localized emissions for CO, NO_X, PM_{10} and $PM_{2.5}$ were evaluated for construction of the Proposed Project. The results of the analysis are included in Table 3A-8. The results of the calculated mass emissions were compared to the LSTs in Table 3A-6. Based on the comparison, the Proposed Project would not exceed the LSTs for criteria pollutants.

Table 3A-8. Summary of Localized Significance

Construction Activity	**NOx**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Demolition	50.58	31.09	3.51	3.31
Site Preparation	24.06	13.47	3.61	3.31
Grading	28.32	16.27	3.64	2.58
Building Construction	27.60	18.66	1.94	1.94
Architectural Coating and Paving	24.11	16.34	2.00	2.00
Localized Significance Threshold for 2 acre site	147	827	6	4
Exceed Significance?	**No**	**No**	**No**	**No**

Notes:
Emissions for CO, NO_X, PM_{10}, and $PM_{2.5}$ given in pounds per day.
Source: Air & Noise Logic, 2012

According to the LST methodology, LST's would only apply to the operational phase if the project included stationary sources or attracted mobile sources that that may spend long periods of time idling at the site (i.e., warehouse/transfer facilities). The Proposed Project does not include such uses; thus, no long-term LST analysis was performed for operation of the Proposed Project (Air & Noise Logic, 2012).

Mitigation Measures

Mitigation measures are not required to reduce impacts to less than significant levels. With implementation of standard provisions for dust control (fugitive dust), required per SCAQMD Rule 403, impacts would be less than significant.

Residual Impacts

No residual impacts would occur.

Impact A-2: Create or contribute to a non-stationary source "hotspot" (primarily carbon monoxide).

Less than significant impact.

CO exceedances are caused by vehicular emissions, primarily while idling at intersections. Vehicle emissions standards have become increasingly stringent over the last several decades. In the 1950's, vehicles were typically emitting about 87 grams of CO per mile. Since the first regulation of CO emissions from vehicles in California, emissions standards for CO applicable to light duty vehicles, have decreased by 96% for automobiles, and new cold weather CO standards have been implemented, effective beginning with the 1996 model year. Currently, the CO standard in California is a maximum of 3.4 grams/mile for passenger cars (with provisions for certain cars to emit even less). With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the SCAQMD have steadily declined.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the SCAB and more specifically with the Proposed Project. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the CO plan, peak carbon monoxide concentrations in the SCAB are the result of unusual meteorological and topographical conditions rather than the impact of particular intersection operation. Considering the region's unique meteorological conditions and the

increasingly stringent CO emissions standards, CO model was performed as part of the 1992 CO Plan and subsequent plan updates and air quality management plans.

In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: Long Beach Boulevard. and Imperial Highway (Lynwood); Wilshire Boulevard. and Veteran Avenue (Westwood); Sunset Boulevard. and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not show a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue. The Los Angeles County Metropolitan Transportation Authority evaluated the LOS (level of service) in the vicinity of this intersection and found it to be E at peak morning traffic and F at peak afternoon traffic.

At build-out of the Proposed Project, the lowest LOS would be F at Wilshire Boulevard and Barrington Avenue (Crain and Associates 2012); the same LOS studied by SCAQMD. Additionally, as detailed in the traffic report (Table 8, Critical Movement Analysis (CMA) & Level of Service (LOS) Summary, Existing (2011) and Future (2014) Traffic Conditions) future delay at each of the eight intersections in the project area demonstrated an improved LOS and reduction in delay when compared to existing conditions. This improvement in LOS and reduction in delay if modeled for CO in detail would result in a reduction in CO emissions when compared to existing conditions in the project area. Additionally, there is no other reason unique to the local meteorology to conclude that this intersection would yield higher CO concentrations if modeled in detail. Therefore, neither the 1-hour nor 8-hour projected CO levels would exceed the ambient air quality standards. The incremental increase is not greater than 1.0 for the 1-hour CO standard or 0.45 for the 8-hour standard. Potential impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

No mitigation is required. Based on the information presented above, a CO "hot spots" would not occur at Project area intersections. The Proposed Project would not have the potential to cause an exceedance of the CAAQS or NAAQS. The results of the traffic analysis demonstrate an improved LOS and a reduction in delay at the intersections in the project area. Consequently, background CO levels would not increase significantly enough to exceed a state or federal threshold.

Residual Impacts

Impacts would be less than significant.

Impact A-3: Expose sensitive receptors to substantial pollutant concentrations.

Less than significant impact.

As discussed, emissions thresholds for the criteria pollutants would not be exceeded with the addition of construction or operational emission from the Proposed Project. LSTs would also not be exceeded. Therefore, exposure of sensitive receptors to substantial pollutant concentrations would not occur.

Mitigation Measures

No mitigation measures are required. Implementation of best management practices for controlling fugitive dust per SCAQMD Rule 403 (i.e., watering the site at least 2 times daily) would reduce temporary air quality impacts during construction, to levels of less than significant.

Residual Impacts

Impacts would not be significant.

3A.5 CUMULATIVE IMPACTS

Impact A-5: 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 (including releasing emissions that exceed quantitative thresholds for ozone precursors).

Less than significant impact.

The CEQA Guidelines Section 15130 requires that projects be evaluated with respect to their contribution to cumulative effects resulting from past, present, and probable future projects. This contribution with respect to air emissions would include both construction and operational emissions. Cumulative contributions for this project encompass 64 related projects in the Cities of Los Angeles and Santa Monica (as discussed in Section 2.6 of this EIR).

SCAQMD determines cumulative impacts based on whether an individual project will exceed SCAQMD thresholds for operational or construction impacts. Therefore, the Proposed Project's air emissions would not result in a cumulatively considerable net impact in the Proposed Project's region.

As shown therein, potential impacts would be less than significant and no mitigation measures are required.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

Section 3B. Cultural Resources

3B.1 INTRODUCTION

The impact analysis for the Proposed Project is based on a historical and archaeological resources assessment prepared by SWCA Environmental Consultants. Revisions to the Proposed Project were made after completion of the *Cultural Resources Assessment for the Westside Family YMCA Project* (SWCA, July 2010). Therefore, the *Addendum to the Cultural Resources Assessment for the Westside Family YMCA Project* (SWCA, June 2011) was prepared to further evaluate the potential for cultural resource impacts resulting from the Proposed Project. Cultural Resource Assessments are contained in Appendix C of this document. The Natural History Museum of Los Angeles County (NHMLA) prepared a sensitivity assessment of the underlying geologic units within the project area based on the known potential to produce scientifically significant fossils (2011).

This section summarizes the results of historical, archaeological and paleontology resources investigations, analyzes the Proposed Project's potential impacts on these resources, and identifies mitigation measures to address potentially significant impacts. The contextual background information on historical resources in the project area, including the area's prehistoric, ethnographic, and historical settings, is provided in Appendix C of this document. The Paleontological Sensitivity Memorandum is also provided in Appendix C of this document.

3B.2 ENVIRONMENTAL SETTING

3B.2.1 Proposed Project Study Area

The project area is situated in the western portion of the Los Angeles basin, a sedimentary basin, approximately 0.75 mile southeast of the Santa Monica Mountains. Rivers and drainages in the highlands to the north and east transported and deposited huge volumes of coarse-grained sandstone and sandy cobble-boulder conglomerate into the basin. Surface deposits in the project area consist entirely of younger Quarternary Alluvium, derived primarily as fan deposits from the Santa Monica Mountains to the north. The project area is at an elevation of approximately 202 to 206 feet above mean sea level (amsl). The school campus contains a known Native American archaeological site, CA-LAN-382, which includes freshwater springs referred to as Kuruvungna Springs or Serra Springs.

3B.2.2 Prehistoric/Ethnographic Setting

The prehistoric inhabitation of Southern California can be summarized within four periods which include the Early Man, Milling Stone, Intermediate, and Late Prehistoric Periods. The Early Man Period ranges from circa 10,000 to 6,000 B.C. The Milling Stone Period took place from circa 6,000 to 3,000/1,000 B.C. The Intermediate Period occurred from circa 3,000/1,000 B.C. to A.D. 500/650. The Late Prehistoric Period ranged from circa A.D. 500/650 to A.D. 1769, where 1769 is the year European contact occurred and the historical record began. The project site is located within the historical tribal boundaries of the Gabrielino/Tongva people.

3B.2.3 Historic Setting

The City of Los Angeles, along with the Proposed Project site, is located within the former San Vicente and Santa Monica land grant, a 33,000-acre Spanish land grant made in 1839. The vicinity of University High School and the surrounding land to the east and south was known as the rural community of Sawtelle. The area was predominantly used for livestock grazing and agricultural production of beans and wheat. When the parcel was eventually consolidated and purchased by the Board of Education ca. 1900, the lower level was planted with walnut trees, and with plum trees on the higher ground north and east of the athletic field. The region was served by the Santa Monica horse-car line that eventually became electric in 1909, connecting the area with downtown Los Angeles. In 1918 the Sawtelle voters decided to merge with the City of Los Angeles, although this did not become official until 1922.

3B.2.4 Research Methodology

Cultural resources were investigated and identified using the following methods:

- A search of the California Historic Resources Information System (CHRIS) was conducted;
- A literature and archival records search at the South Central Coastal Information Center (SCCIC), located at California State University-Fullerton, for previously recorded cultural resources and investigations within the project area and a half-mile radius;
- Reviews of the National Register of Historic Places (NRHP), the California Register of Historic Resources (CRHR), the California Points of Historical Interest (CPHI) list, the California Historical Landmarks (CHL) list, and the Archaeological Determinations of Eligibility (ADOE) were conducted;
- Review of the City of Los Angeles Historic–Cultural Monuments list;

- Pertinent portions of the USGS Santa Monica 15-minute quadrangle (1902) and U.S. Army Corp of Engineers (USACE) quadrangle (1921) were reviewed;
- Sanborn maps available in the Phase I Environmental Assessment were reviewed;
- Previously conducted cultural resources studies within one-half mile of the project area were reviewed;
- The Native American Heritage Commission (NAHC) was contacted to request a review of the Sacred Lands File (SLF) and to obtain a list of Native American groups or individuals listed for Los Angeles County;
- Correspondence with the NAHC listed contacts;
- A reconnaissance-level archaeological survey of the project area and Serra Springs was conducted on May 5, 2010;
- A reconnaissance-level built environment field survey was conducted on May 5, 2010 simultaneously with the archaeological survey; and
- A paleontological collections records search was conducted by the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (NHMLA).

According to the records search, twenty-two prior cultural resources studies have been conducted within one-half mile of the project area, including two archaeological monitoring studies conducted on portions of the University High School campus. Neither of the monitoring efforts resulted in the discovery of intact or significant prehistoric or historic deposits. The records search identified two previously recorded cultural resources on the University High School campus. The first is a water spring, a place important to living Native Americans. The site is referenced as P-19-000382/CA-LAN-382 in CHRIS and is commonly referred to as Serra Springs, or Kuruvungna Springs. Kuruvungna Springs is listed as California Historic Landmark 522 because of its association with the Gaspar de Portolà expedition of 1769, one of the first European forays into the Los Angeles area. Although its boundaries have not been adequately defined, this resource is generally located in the southeast portion of the campus, adjacent to the Continuation High School. No recorded vertebrate fossils have been found within the project area, but at least two scientifically significant fossil localities have been documented in the vicinity of the project site.

3B.2.6 Historic Resources

A "historic resource" is defined in the California Public Resources Code Section 21084.1 as: a resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources. Historic resources included in a local

register of historical resources..., or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, [is]...presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

To be considered eligible for listing in the California Register, a property must be found by the State Historical Resources Commission to be significant under at least one of the following four criteria:

- It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- It is associated with the lives of persons important in our past;
- It 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; and/or
- It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to the above-listed criteria, resources must retain enough of their historic character or appearance to be recognizable as historic resources and to convey the reasons for their significance.

Previously Recorded Historic Sites

In addition to Serra Springs, or Kuruvungna Springs (P-19-000382/CA-LAN-382), a second source identified by the records search is the main University High School building, which was determined eligible for the National Register in 1994. The main building at University High School was constructed in 1924. Alterations in 1935 were designed by noted Southern California architect Claud Beelman.

Neither of the above sites are located within the boundaries of the project area. Two other built environment resources, the Los Angeles Veterans Administration Medical Center, and Holderman Hall USAR Center, are outside the University High School campus. No listed properties in the CPHI, ADOE, or HRI are within the boundaries of the project area.

Built Environment Survey Results

The built environment field survey identified four buildings and tennis and handball courts in the area to be disturbed by the Proposed Project. None of these buildings are considered "historical resources" under CEQA. According to a historical map and photograph review, the project area was developed with family residences as early as 1912. By the 1950s most of the single family

dwellings had been demolished and larger multi-family apartments had been constructed. During this time, Granville Avenue continued north and dead-ended just south of the school's track; an unnamed alley connected Granville and South Westgate Avenues. Sometime between 1976 and 1989, the apartment buildings were demolished, and Granville Avenue and the unnamed alley were subsumed into the school property. A storage room and locker room buildings were constructed circa 1956, but these buildings were removed by 1989 and replaced by classroom bungalow buildings and another locker room in the late 1990s.

3B.2.6 Archaeological Resources

If an archaeological resource does not fall within the definition of a historical resource but does meet the definition of a "unique archaeological resource" (Pub Res Code 21083.2), then the site must be treated in accordance with the special provisions for such resources. An archaeological resource is unique if it:

- is associated with an event or person of recognized significance in California or American history or recognized scientific importance in prehistory;
- can provide information that is of demonstrable public interest and is useful in addressing scientifically consequential and reasonable research questions;
- has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind;
- is at least 100 years old and possesses substantial stratigraphic integrity; or
- involves important research questions that historical research has shown can be answered only with archaeological methods.

Previously Recorded Sites

Site 19-000382 (CA-LAN-382) is a multi-component site that includes a prehistoric archeological site, a reported campsite of early Spanish explorers, and a place currently held as important by Native Americans. The freshwater springs have been given many names over the years, including San Vicente Spring, San Roger's Spring, Wounded Deer Springs, Fr. Junipero Serra Springs (Serra Springs), Gabrielino/Tongva Springs, Tongva Sacred Springs, and Kuruvungna Springs. The archaeological site is also known as the "UNIHI site". The resource is collectively referred to as Serra/Kuruvungna Springs, combining the two names most often used today. Serra Springs has been documented over a large portion of the University High School campus. The most visible spring today is located at the base of a hill approximately 500 feet northeast of the Proposed Project. The water flows into a series of concrete-lined pools. This site is outside the area that would be disturbed by the Proposed Project.

Native American Consultation

Native American consultation for the Proposed Project was initiated on April 12, 2010. The Native American Heritage Commission (NAHC) was contacted to request a review of the Sacred Lands File (SLF) and obtain a list of Native American groups or individuals listed by the NAHC for Los Angeles County who may have knowledge of cultural resources in or near the project area. On April 15, 2010, the NAHC responded, indicating that the search did indicate the presence of Native American sacred lands or traditional cultural properties in the immediate area of the project. *Prior to completion and circulation of the Notice of Preparation and Initial Study, the Proposed Project was revised to eliminate the surface parking lot adjacent to Barrington Avenue. As a result of the redesign, the NAHC performed a second SLF and found no sites within the Proposed Project area (NAHC Letter dated April 7, 2011; a copy the NAHC Letter is provided in Appendix A).*

Archaeological Reconnaissance Survey Results

A reconnaissance-level archaeological survey of the Proposed Project site was conducted on May 5, 2010. The survey consisted of a comprehensive site visit, inspection of on-site soils for the presence of surface archaeological deposits where ground visibility and access were possible, and development of a photographic record. The presence of buildings, pavement, and/or landscaping resulted in poor ground visibility throughout the area surveyed, and no ground visibility at some properties. No archaeological resources were observed during the reconnaissance-level survey.

3B.2.8 Paleontological Resources

Paleontologically sensitive sedimentary units are those units with a high potential for containing significant paleontological resources (i.e., rock units within which vertebrate fossils or significant invertebrate fossils have been determined by previous studies to be present or likely to be present). These units include, but are not limited to, sedimentary formations that contain significant paleontological resources anywhere within their geographical extent as well as sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Thus, a determination of paleontologic sensitivity must consider not only the potential for yielding abundant vertebrate fossils but also the potential for production of a few significant fossils, large or small, vertebrate or invertebrate, which may provide new and significant data on fossils types, species changes over time, or geologic strata. Areas that may contain datable organic remains older than the recent era and areas that may contain unique new vertebrate deposits, traces, and/or trackways must also be considered paleontologically sensitive.

Fossils can be considered to be of significant scientific interest if one or more of the following criteria apply.

- The fossils provide data on the evolutionary relationships and developmental trends among organisms, both living and extinct.
- The fossils provide data useful in determining the age(s) of the rock unit(s) or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein.
- The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas.
- The fossils demonstrate unusual or spectacular circumstances in the history of life.
- The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation and are not found in other geographic locations.

Paleontology Records Search

A paleontological collections records search was conducted by the Vertebrate Paleontology Section of the Natural History Museum of Los Angeles County (Appendix C) to assess the sensitivity of underlying rock units based on known potential to produce scientifically significant fossils elsewhere within the same geologic unit. No recorded vertebrate fossil localities were found within the boundaries of the project area. However, at least two scientifically significant fossil localities have been documented in the vicinity of the Proposed Project site, and in the same sedimentary deposits as those that occur within the project area.

The project area is underlain by younger Quaternary alluvial deposits of Holocene age (10,000 years before present to recent). Surficial deposits of these sediments generally consist of unconsolidated gravel, sand, silt, and clay deposited in modern stream channels and fluvial slope wash. These deposits are partly derived from the Santa Monica Mountains to the north. The younger Quaternary sediments are underlain by older Quarternary deposits. Younger alluvium deposits typically do not contain significant vertebrate fossils, at least in the uppermost layers, but at varying depths they are underlain by older Quaternary alluvium deposits known to contain fossils.

According to the NHMLA, older alluvium deposits in the vicinity of the project area have yielded significant vertebrate remains of medium to large terrestrial mammals in at least two localities during excavations as shallow as 6 feet below ground surface. Therefore, Quaternary older alluvium is considered to have a high paleontological sensitivity. No fossil localities were discovered within the younger Quaternary alluvium within the project area. Thus, surficial deposits are considered to have low paleontological sensitivity. The sensitivity of younger alluvium does; however, increase with depth, as it overlies the highly sensitive older alluvium (NHMLA, 2011).

3B.3 APPLICABLE REGULATIONS

This regulatory framework sets the context for the range of issues related to historical resources that the LAUSD will consider in the evaluation of the potential for the Proposed Project to have a significant effect on cultural (historic) resources.

3B.3.1 Federal

National Historical Preservation Act of 1966

The National Historic Preservation Act of 1966 established the NRHP as the official federal list of cultural resources that have been nominated by state offices for their historical significance at the local, state, or national level (CFR § 60.2). Properties listed in the NRHP, or determined eligible for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Significance is determined by four aspects of American history or prehistory recognized by the NRHP Criteria, which are listed in this section under the heading "Definitions of Historical Resources."

3B.3.2 State

California Register of Historical Resources

State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in Section 15064.5 (a) of the CEQA Guidelines. The CRHR criteria are nearly identical to those for the NRHP, which are listed in this section under the heading "Definitions of Historical Resources." The State Historical Resources Commission maintains the CRHR. Properties listed, or formally designated eligible for listing, in the NRHP are automatically listed in the CRHR.

California Administrative Code, Title 14, Section 4307

This code states, "No person shall remove, injure, disfigure, deface, or destroy any object of paleontological, archaeological, or historical interest or value."

California Public Resources Code

Section 5097.5 (Stats. 1965, C. 11362792)

Public Resource Code Section 5097.5 defines as a misdemeanor, the unauthorized disturbance or removal of archaeological, historical, or paleontology resources located on public lands. It prohibits the knowing destruction of objects

of antiquity without a permit (expressed permission) on public lands, and provides for criminal sanctions. This statute was amended in 1987 to require consultation with the California Native American Heritage Commission whenever Native American graves are found. Violations for taking or possessing remains or artifacts are felonies.

Chapter 1332, Section 5097.9

This section establishes the California Native American Heritage Commission to make recommendations to encourage private property owners to protect and preserve sacred places in a natural state and to allow appropriate access to Native Americans for ceremonial or spiritual activities. The Commission is authorized to assist Native Americans in obtaining appropriate access to sacred places on public lands and to aid state agencies in any negotiations with federal agencies for the protection of Native American sacred places on federally administered lands in California.

Section 5097.98-99 (Stats. 1982, C. 1492. Amended 1987)

This section of the Public Resources Code requires that the California Native American Heritage Commission be consulted whenever Native American graves are found. It makes it illegal to take or possess remains or artifacts taken from Native American graves but does not apply to materials taken before 1984.

3B.3.3 Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG), which is the designated Metropolitan Planning Organization for six Southern California counties (Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles), is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG has prepared the Regional Comprehensive Planning Guide (RCPG, 1996) in conjunction with its constituent members and other regional planning agencies. The specific growth management policy of the RCPG that relates to the Proposed Project is as follows:

> ***Policy 3.21.*** *Encourage the implementation of measures aimed at the preservation and protection of the recorded and unrecorded cultural resources and archaeological sites.*

3B.3.4 Local

Los Angeles Municipal Code

Standard Specifications for Public Works Construction, Section 6-3.2 Requires that grading, excavation, or other ground disturbing activities for a public project be halted in the area of a paleontological or archaeological find, until such time as a resource expert can review the find, determine its significance, and if required, determine appropriate mitigation measures.

3B.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3B.4.1 Methodology

The analysis contained within this EIR is focused on the Area of Potential Effect (APE) and based on the historical and archaeological resources report prepared by SWCA (2011), as well as a paleontology records check prepared by the Natural History Museum of Los Angeles County. The APE in this case is defined as the area that would be directly impacts by Proposed Project construction. The information contained in these reports is analyzed using the criteria for determining significance under the CEQA Guidelines and the LAUSD PEIR, presented below.

3B.4.2 Criteria for Determining Significance

CEQA Guidelines Section 15064.5 requires that public or private projects financed or approved by public agencies must assess the effects of the project on archaeological and historical resources. The criteria used to determine the significance of an impact are based on the Initial Study Checklist in Appendix G of the CEQA Guidelines and LAUSD Cultural Resources Assessment Procedures. The Proposed Project would result in significant impacts related to cultural resources if it would result in:

- A substantial adverse change in a historical resource through:
    - demolition or destruction of a historical resource;
    - relocation, conversion, rehabilitation, or alteration of a historical resource that materially impairs the significance of the resource within the meaning of CEQA Guidelines §15064.5(b)(2); or,
    - alteration to the immediate surroundings of a historical resource that materially impairs the significance of the resource within the meaning of CEQA Guidelines §15064.5(b)(2).
- Damage to a unique archaeological resource as defined in Public Resources Code §21083.2(g) that materially impairs the significance of the resource.

- The destruction of a unique paleontology resource.

When determining impacts to historical or archaeological resources under CEQA, the following portions of Section 15064.5 of the CEQA Guidelines shall be considered:

- *(b)(1)Substantial adverse change* in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surrounding such that the significance of a historical resource would be materially impaired.

- (b)(2)(A-C) The significance of a historical resource would be materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that convey its historic significance and that qualify as a historical resource for the purpose of CEQA according to Section 15064.5(a).

- (c)(1-2) When a project will impact an archaeological site, the site must first be determined to be a historical resource pursuant to Section 15064.5(a), and if it is a historical resource, impacts shall be determined according to the criteria in Section 15064.5(b), and it shall not be subject to the provisions for unique archaeological resources.

- (d)(3-4) If an archaeological site is not a historical resource, the provisions of Public Resources Code Section 21083.2 will be applied to determine if the site meets the definition and treatment for a unique archaeological resource.

CEQA requires that if a project would result in an impact that may cause a substantial adverse change in the significance of a historical resource, then alternative plans or mitigation measures must be considered; however, only significant historical resources need to be addressed. Therefore, before the development of mitigation measures, the significance of cultural resources must first be determined.

3B.4.3 Project Impacts

The environmental impact analysis presented below is based on determinations made in the IS/NOP for issues found to be potentially significant or issues identified by reviewing agencies, organizations, or individuals commenting in the IS that made a reasonable argument that the issue was potentially significant (see IS/NOP, Appendix A).

Impact B-1: Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.

Less than significant impact

Under the Proposed Project, all existing uses within the proposed site would be removed, and a new YMCA facility and parking structure would be constructed. No structures or buildings within the site are considered historical resources, and the demolition of ball courts and bungalow buildings would not represent a significant effect. The results of the built environment resources review determined that no qualifying "historic resources" were identified in the Proposed Project area. The main University High School building, which was previously determined eligible for the National Register, is outside of the project area that would be disturbed by the Proposed Project. Serra/Kuruvungna Springs is located approximately 300 feet east of the APE; and thus, would not be affected by the Proposed Project.

Mitigation Measures

No mitigation is required.

Residual Impacts

There would be no residual impacts.

Impact B-2: Cause a substantial adverse change in the significance of a archeological resource pursuant to §15064.5.

Less than significant impact with mitigation incorporated

No archaeological resources within the direct APE were identified in the records search or encountered during the field survey. The project area was previously disturbed during construction of the high school campus. However, site CA-LAN-382 has been documented over a large portion of the campus and is related to Serra/Kuruvungna Springs. The results of the study indicate that the Proposed Project area has a high sensitivity for encountering below-ground archaeological resources.

Because of the high sensitivity for encountering Native American-affiliated archaeological resources on campus, full-time monitoring by a qualified archaeologist and a Native American is recommended as mitigation (see Mitigation Measures 3B.1 and 3B.2) during all grading and excavation activities associated with the Proposed Project. Impacts to cultural resources would be

less than significant with mitigation incorporated. These recommendations are clarified in Mitigation Measures 3B.1 and 3B.2 below.

Mitigation Measures

3B.1 Prior to initiation of ground-disturbing activities, qualified archaeologists shall conduct a short awareness training session for all construction workers and supervisory personnel. The course will explain the importance of and legal basis for the protection of significant archaeological resources. Each worker will also learn the proper procedures to follow in the event cultural resources or human remains/burials are uncovered during ground-disturbing activities. These procedures include work curtailment or redirection and the immediate contact of their supervisor and the archaeological monitor. This worker education session shall include visuals of artifacts (prehistoric and historic) that might be found in the project vicinity, and that it take place on-site immediately prior to the start of ground disturbance. The approximately 30- to 45-minute training session may be conducted on site by video, PowerPoint presentation, or related media.

3B.2 Given the high likelihood that project construction could encounter archeological resources, Native American and archeological monitoring shall commence during all grading and excavation associated with the project. Monitoring shall consist of directly watching the excavation and earth-moving activities for the entirety of each work day. If cultural resources are observed during monitoring, the archaeological monitor shall alert the construction supervisor that work needs to be temporarily halted or excavation equipment diverted to examine the find. If the monitors suspect that significant cultural remains have been encountered, the piece of equipment that encounters the find shall be stopped or diverted to another work area, and the excavated area inspected by the monitoring archaeologist/Native American. If potentially significant deposits are found, the principal investigator shall inspect the deposits and develop recommendations for identification, testing, evaluation, preservation, or mitigation, as appropriate. If the principal investigator determines that the suspected remains are non-significant or non-cultural in origin, work shall recommence immediately following basic documentation. If further study is determined to be warranted, the find(s) shall be mapped, recorded, and bagged with the proper provenience and the item(s) collected by the archaeological monitor.

Residual Impacts

There would be no residual impacts.

Impact B-3: Directly or indirectly destroy a unique paleontological resource or site.

Less than significant impact with mitigation incorporated

According to the NHMLA, surface grading or very shallow excavation in the Proposed Project area is unlikely to uncover significant fossil vertebrates. Deeper excavations that extend down into older Quaternary deposits in excess of 6 feet in depth, however, may encounter significant fossil vertebrate remains. Impacts to paleontological resources would be less than significant with mitigation incorporated. These recommendations are identified as Mitigation Measures 3B.3 through 3B.7 below.

Mitigation Measures

3B.3 All project-related ground disturbances greater than 6 feet that could potentially impact paleontologically sensitive Quaternary older alluvium will be monitored by a qualified paleontological monitor on a full-time basis, as this geologic unit is considered to have a high paleontological sensitivity. Any substantial excavations that occur in surficial younger (Holocene age) Quaternary alluvial and fluvial deposits and/or topsoil (estimated to occur at less than 6 feet in depth) will be monitored on a part-time basis to ensure that underlying paleontologically sensitive sediments are not being impacted.

3B.4 A Qualified Paleontologist will be retained to supervise monitoring of construction excavations greater than 6 feet and to produce a Paleontological Monitoring and Mitigation Plan for the Proposed Project.

3B.5 At each fossil locality, field data forms will be used to record pertinent geologic data, stratigraphic sections will be measured, and appropriate sediment samples will be collected and submitted for analysis.

3B.6 Recovered fossils will be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and reposited in a designated paleontological curation facility. The most likely repository is the NHMLA.

3B.7 The Qualified Paleontologist will prepare a final monitoring and mitigation report to be filed with the client, the lead agency, and the repository.

Residual Impacts

Impacts would be less than significant.

Impact B-4: Disturb any human remains, including those interred outside of formal cemeteries.

Less than significant impact with mitigation incorporated

Remnants of a Native American village and burial site were discovered during construction of the school around 1925. Given the sensitivity of the University High School for buried cultural resource, the discovery of human remains is always a possibility during ground disturbances. Therefore, impacts to human remains, including those interred outside of formal cemeteries, would be less than significant with mitigation incorporated. These recommendations are clarified in Mitigation Measure 3B.8 below.

Mitigation Measures

3B.8 If human remains are encountered during excavation, State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify the Most Likely Descendent (MLD). With permission of the landowner of his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Residual Impacts

Impacts would be less than significant.

3B.5 CUMULATIVE IMPACTS

Impact B-5: Result in cumulatively considerable impact with respect to cultural resources.

Less than significant impact with mitigation incorporated

No on-site historical structures were identified within the Proposed Project site. The main University High School building is historical resource, but the historic value of this resource would not be impaired by the Proposed Project. Therefore,

there would be no direct or cumulative impacts to historical resources associated with construction of the Proposed Project.

The Proposed Project was evaluated for its potential sensitivity to contain significant archaeological resources. As discussed above, the Proposed Project has the potential to adversely affect known cultural resources. However, implementation of Mitigation Measures 3B.1 and 3B.2 would reduce potential impacts to less than significant. Cumulative projects could impact buried cultural resources. Impacts related to cultural resources are typically addressed and mitigated to acceptable levels for each project on a case-by-case basis. Implementation of mitigation measures specified for each of the cumulative projects and implementation of mitigation measures 3B.1 through 3B.2 would reduce any potential cumulative effects on cultural resources caused by Proposed Project implementation. This would minimize any cumulatively considerable contribution to cultural resources impacts.

As discussed, the Proposed Project site was evaluated for the potential to contain significant paleontological resources. The Proposed Project could potentially affect paleontological resources. Mitigation was identified for the project to minimize potential significant impacts (Mitigation Measures 3B.3 through 3B.8). Projects on the cumulative list could also impact paleontological resources. Implementation of project specific mitigation measures would reduce any potential cumulative effects on paleontological resources from the Proposed Project. Cumulative impacts to cultural and/or paleontological resources would be less than significant with mitigation incorporated.

Mitigation Measures

Implementation of Mitigation Measures 3B.1 through 3B.8 above and implementation of project specific mitigation measures for projects on the cumulative list would reduce potential cumulative impacts to less than significant levels.

Residual Impacts

Impacts would not be cumulatively considerable with implementation of the project-related mitigation measure and design features.

Section 3C. GREENHOUSE GAS EMISSIONS

3C.1 INTRODUCTION

This section describes the science and regulatory framework associated with global climate change and considers the potential for greenhouse gas (GHG) emissions created by the Proposed Project that may significantly impact the environment. The analysis also addresses the potential for conflict with GHG emissions reduction programs described herein. Information in this section is summarized based on data in the *Air Quality Technical Memorandum* prepared by Air and Noise Logic (2012) (see Appendix B) to this EIR.

3C.2 GLOBAL CLIMATE CHANGE BACKGROUND

GHGs are those compounds in the atmosphere that play a critical role in determining the Earth's surface temperature. Specifically, these gasses allow high-frequency solar radiation to enter the atmosphere, but retain the low-frequency energy that is radiated back to space which can contribute to a warming of the atmosphere. This phenomenon is referred to as the greenhouse effect. Increased concentrations of GHGs in the atmosphere are thought to be linked to global climate change which can result in rising surface temperatures, higher sea level, and the increasing frequency and magnitude of severe weather. In Los Angeles, climate change can mean more heat wave days per year, increased percentage of days with poor air quality leading to increased health risks, changes in rainfall patterns, and impacts to drinking water supplies from reductions in snowmelt levels and increases in salt-water intrusion from sea-level rise (CAT, 2010).

GHGs include carbon dioxide (CO_2), methane (CH_4), O_3, water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Carbon dioxide is the most abundant GHG. Other GHGs are less abundant but have higher Global Warming Potential (GWP) than CO_2. Global Warming Potential is the measurement used to compare the ability of each GHG to trap heat in the atmosphere. Because CO_2 is the most abundant GHG, it serves as the reference gas for GWP. Emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2E. Thus, CO_2 has a GWP of 1, and is expressed as CO_2E. CO_2 emissions account for approximately 85 percent of the CO_2E emissions in the United States. Methane and nitrous oxide are the most common GHGs after CO_2 and comprise approximately 8 percent and 5 percent of total CO_2E emissions in the United States, respectively. The GWP for methane is 21, while nitrous oxide has a GWP of 310.

GHGs are the result of natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. Fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. Industrial and commercial sources are the second largest contributors of GHG emissions with about one-fourth of total emissions (CAPCOA, 2008).

3C.3 ENVIRONMENTAL SETTING

According to the California Air Resources Board (CARB), California is the 15th largest emitter of GHGs in the world producing about two percent of worldwide GHG emissions (Climate Change Scoping Plan, 2008). Based on CARB's Greenhouse Gas Inventory, between 2002 and 2004, California produced an annual average of approximately 469 million metric tons of CO_2E. The transportation sector is the largest contributor generating 38 percent of the state's total GHG emissions. The electricity and commercial/residential energy sector is the next largest contributor generating over 30 percent of the statewide GHG emissions.

3C.3 APPLICABLE REGULATIONS

Reducing the severity of global climate change has prompted action to control GHG emissions at the international, federal, state, and local agency levels.

3C.3.1 Federal

The United States participates with several other counties in the United Nations Framework Convention on Climate Change (UNFCCC). The objective of the UNFCC is to stabilize GHG emissions concentrations in the atmosphere at a level that would prevent and reduce dangerous human-induced interference with the climate system. Rather than set absolute caps on GHG emissions, the federal government has established voluntary and incentive-based programs to reduce emissions and developed programs to promote climate technology and science. In 2007, the federal government passed the Energy Independence and Security Act which would help to reduce GHG emissions by establishing a fuel economy standard of 35 miles per gallon by 2020, improve energy efficiency in lighting and major appliances, and increase renewable energy use (U.S. House, 110th Congress, 2007).

Despite participation in the UNFCC and the passage of the Energy Independence and Security Act, there is no overarching Federal law or policy governing the regulation of GHGs. However the U.S. Environmental Protection Agency (EPA) is positioned to create climate change regulations. In March 2009, the EPA proposed a rule that requires mandatory reporting of emissions of GHGs from large sources within the United States. The rule would require facilities that

emit over 25,000 metric tons or more per year of GHG emissions to report annual emissions to the EPA. The rule was approved in September 2009 and went into effect January 1, 2010. Later that year, EPA issued a proposed Finding of Endangerment and Cause or Contribution Finding for Greenhouse Gases under the Clean Air Act, marking an important step toward the establishment of federal GHG regulations under the Clean Air Act.

3C.3.2 California

California has passed several bills and various executive orders have been signed to address greenhouse gases. The Governor's Office of Planning and Research (OPR) is in the process of developing CEQA significance thresholds for GHG emissions but thresholds have yet to be established. GHG statues and executive orders (EO) of note include Assembly Bill (AB) 32, AB 1493, Senate Bill (SB) 97, SB 375, EO S-03-05, and EO S-01-07.

AB 1493

Assembly Bill 1493 directed the Air Resources Board (ARB) to adopt regulations to achieve the maximum feasible and cost effective reduction of greenhouse gas emissions from motor vehicles. The so-called "Clean Car regulations", were approved by the Board in 2004. Setting emission standards on automobiles is the responsibility of the federal EPA but the CAA Clean Air Act (CAA) allows states to set state-specific emission standards on automobiles if they first obtain a waiver from the EPA. The Air Resources Board submitted a request to the United States Environmental Protection Agency to implement the regulations in December 2005. After several years of requests to the federal government, and accompanying litigation, this waiver request was granted on June 30, 2009. It is expected that these regulations will reduce GHG's from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs (CAT, 2010).

EO S-3-05

Executive Order S-3-05 (June 2005) established GHG emission targets for the state: year 2000 emission levels by 2010; 1990 levels by 2020; and 80 percent below 1990 levels by 2050. It also directed the Secretary of the California Environmental Protection Agency to coordinate efforts to meet the targets with the heads of other state agencies. This group became the Climate Action Team (CAT).

AB 32

The California Global Warming Solutions Act of 2006, best known by its bill number AB 32, created a first-in-the country comprehensive program to achieve real, quantifiable and cost-effective GHG emission reductions. The law set an economy-wide cap on California GHG's emissions to 1990 levels by the year

2020 and directed the ARB to prepare, approve, and implement a Scoping Plan for achieving the maximum technologically feasible and cost-effective reductions in GHG emissions (CAT, 2010). A unique aspect of AB 32, beyond its broad and wide-ranging mandatory provisions and dramatic GHG reductions are the short time frames within which it must be implemented. Major components of the AB 32 include:

- Require the monitoring and reporting of GHG emissions beginning with sources or categories of sources that contribute the most to statewide emissions;
- Requires immediate "early action" control programs on the most readily controlled GHG sources;
- Mandates that by 2020, California's GHG emissions be reduced to 1990 levels, and that by 2050, GHG emission levels are reduced to 80 percent below 1990 levels;
- Forces an overall reduction of GHG emissions in California by 25-40%, from business as usual, over the next 13 years (by 2020); and
- Must complement efforts to achieve and maintain federal and state ambient air quality standards and to reduce toxic air contaminants.

Reducing passenger vehicle emissions is central to reducing GHG emissions statewide and California is implementing the world's first Low Carbon Fuel Standard for transportation fuels, pursuant to both EO S-01-07, signed January 2007, and AB 32 (CAT, 2010). The standard requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020 (CAT, 2010). Additional approaches for reducing GHG emissions to 1990 levels by 2020 include: expanding and strengthening existing energy efficiency programs and building standards; achieving a statewide renewable electricity standard of 33 percent; and developing a California cap-and-trade program that links with other climate change partner programs to create a regional market system (CAT, 2010).

SB 375

In addition to vehicle emissions regulations and the low carbon fuel standard, the third effort reducing greenhouse gas emissions from transportation, is the reduction in the demand for personal vehicle travel (i.e., vehicle miles traveled or VMT). This measure was addressed in September 2008 through the Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375. The enactment of Senate Bill 375 initiated an important new regional land use planning process to mitigate greenhouse gas emissions by integrating and aligning planning for housing, land use, and transportation for California's 18 Metropolitan Planning Organizations, such as SCAG.

SB 97

SB 97, codified in 2008, provides direction to the OPR to develop GHG emissions criteria to be used in determining project impacts under CEQA. These criteria were developed in 2009 and went into effect in 2010 (CAT, 2010).

California Attorney General's Office Strategies

The California Attorney General's Office has been a partner in the state's efforts to fight global warming and promote a clean energy economy (CAT, 2010). Per direction from AB 32, the General's Office developed a set of strategies and mitigation measures with the intent of reducing global warming related impacts at the individual project level.

State Green Building Standards Code (CALGreen)

On January 12, 2010, the California Building Standards Commission adopted a statewide green building standards code known as "CalGreen". CalGreen supplements the California Building Standards Code (Title 24, Part 6) and went into effect on January 1, 2011. CalGreen requires new buildings to demonstrate a 20 percent reduction in water usage, divert 50 percent of construction waste from landfills, install low-pollutant emitting interior finishes such as paints, carpets, and flooring, and upgrade irrigation (landscape) devices for non-residential buildings.

3C.3.2 Regional

South Coast Air Quality Management District

The Proposed Project falls within the South Coast Air Basin; and therefore, is under the jurisdiction of the SCAQMD. On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO_2 equivalent/year. As part of the Interim GHG Significance Threshold development

process for industrial projects, the SCAQMD established a working group of stakeholders that also considered thresholds for commercial projects. As discussed in the Interim GHG Significance Threshold guidance document, the focus for commercial projects is on performance standards and a screening level threshold. At a stakeholder meeting on development of a GHG Significance Threshold (November 19, 2009), SCAQMD staff presented two options for GHG emissions screening values. Option 1 proposes a threshold of 3,000 $MTCO_2E$/year for all residential and commercial projects; Option 2 proposes a threshold value by land use type where the numeric threshold is 3,500 $MTCO_2E$/year for residential projects; 1,400 $MTCO_2E$/year for commercial projects; and 3,000 $MTCO_2E$/year for mixed use projects. Although both options are recommended, a Lead Agency is advised to use only one consistently. Option 2, the combined threshold of 3,000 MT of CO_2E is the screening threshold used in this analysis.

Southern California Association of Governments

As required by SB 375, the Southern California Association of Governments (SCAG) is including a Sustainable Communities Strategy (SCS) in the 2012 Regional Transportation Plan (RTP). This element will demonstrate how transportation, land use, and housing planning can be integrated to achieve the state-determined regional GHG emission reduction target from cars and light trucks. SCAG is currently holding public workshops and other sessions designed to seek commitment on specific strategy elements to be included in the Draft 2012 RTP/SCS (Approach to Implementing SB 375, 2011).

Los Angeles Unified School District

The LAUSD through the Office of Environmental Health and Safety has established waste reduction programs to reduce the amount of GHGs emitted by the district. From 2004 to 2008, the District eliminated over 400,000 $MTCO_2E$ that would otherwise have been emitted into the atmosphere. This reduction was achieved using enhanced waste prevention, composting, and recycling activities (LAUSD, Office of Environmental Health and Safety Webpage, 2008).

3C.3.2 Local Regulations and Policies

City of Los Angeles

The City of Los Angeles released its climate action plan, Green LA: An Action Plan to Lead the Nation in Fighting Global Warming, in May 2007. The Plan sets forth a goal of reducing the City's greenhouse gas emissions to 35% below 1990 levels by the year 2030 (2008). This plan identifies over 50 action items, grouped into focus areas, to reduce emissions. While the emphasis is first on municipal facilities and operations, several measures address programs to reduce emissions in the community (City of Los Angeles, EnvironmentLA, 2007). Action

items range include, harnessing renewable energy production, retrofitting municipal buildings with energy efficiency upgrades, converting the City's fleet vehicles to cleaner and more efficient models, reducing water consumption, and providing rebates for the purchase of energy-efficient appliances. A major component of the climate action plan is the implementation of a comprehensive set of green building policies, otherwise referred to as Los Angeles' Green Building Code, to guide sustainable development in the private sector. Article 9, Chapter IX of the Green Building Code adopts by reference the CALGreen Code with amendments and applies mandatory energy and water efficiency requirements to new buildings generally of 50,000 square feet or more and specifically for "every building alteration with a building permit valuation of over $200,000" (LAMC, 2011).

3C.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3C.4.1 Methodology

GHG emissions from the proposed construction and operational activities were calculated using the SCAQMD's CalEEMod version 2011.1.1 computer program. These project-related GHG emissions were then combined and compared to the CEQA significance threshold.

3C.4.2 Criteria for Determining Significance

The criteria used to determine the significance of Proposed Project impacts on GHG emissions are based on the model Initial Study checklist in Appendix G of the CEQA Guidelines. In the IS/NOP, it was determined that the Proposed Project may result in potentially significant impacts relating to greenhouse gas emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

There is no specific GHG emissions threshold by which community recreation facilities such as the Proposed Project are evaluated against. In the absence of these specific criteria, the SCAQMD's suggested combined threshold of 3,000 $MTCO_2E$ for mixed-use projects is the significance threshold used in this analysis.

3C.4.3 Project Impacts

The environmental impact analysis presented below is based in part on comments made in response to the IS/NOP that included a reasonable argument

that GHG impacts could be potentially significant (see Responses to NOP/Initial Study, Appendix A).

Impact C-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

Less than significant impact

The Proposed Project would result in construction-related GHG emissions. The CalEEMod model calculates GHG emissions from project-related fuel usage by construction equipment and construction-related activities including construction worker trips. Table 3C-1 summarizes the estimated GHG emissions that would be emitted with construction of the Proposed Project. The analysis of construction impacts assumes an 18-month construction schedule, which includes demolition and removal of four bungalow buildings, site grading, parking structure and building construction, and application of architectural coatings.

Table 3C-1. Project Construction Equipment GHG Emissions

Year	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_20	Total CO_2E
2012	283.57	0.04	0.00	284.32
2013	427.87	0.05	0.00	428.93
Total	711.44	0.09	0.00	731.25
			Amortized Total	23.78

Source: Air & Noise Logic, 2012

As shown, construction could generate 1,161.59 $MTCO_2E$. The draft SCAQMD GHG threshold Guidance document (October 2008) recommends that construction emissions be amortized for a project lifetime of 30 years to ensure that GHG reduction measures address construction GHG emissions as part of the operational reduction strategies. Therefore, the Proposed Project's total construction emissions were divided over 30 years to yield an average of 23.78 $MTCO_2E$ per year.

CalEEMod estimates the GHG emissions associated with building electricity and natural gas usage (non-hearth) for each land use type. Electricity and natural gas used in buildings is typically generated at an off-site power plant which indirectly generates GHG emissions. The default values used in CalEEMod modeling software are based on the California Energy Commission's sponsored California Commercial End Use Survey and Residential Appliance Saturation Survey

studies, and reflect current 2008 Title 24 improvements. Table 3C-2 summarizes operational GHG emissions associated with the Proposed Project.

Table 3C-2. Annual Project Energy-Related GHG Emissions

Source	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_20	Total CO_2E
Electricity	423.09	0.01	0.00	424.47
Natural Gas	62.74	0.00	0.00	63.12
Project Total	485.83	0.01	0.00	487.59

Source: Air & Noise Logic, 2012

As shown in Table 3C-2, the Proposed Project could generate an estimated 487.52 $MTCO_2E$ per year from consumption of electricity and natural gas with the majority of this share resulting from electricity consumption. It should be noted that the existing Westside Family YMCA facility located at 11311 La Grange Avenue would no longer operate when the proposed facility is open. Thus, GHG emissions associated with the existing site would be removed from the regional inventory However, no emissions credit has been applied for the removal of this existing use to provide a more conservative analysis.

CalEEMod default values were used to estimate annual mobile source GHG emissions. CalEEMod estimated average daily trip rates for a typical Weekday, Saturday, and Sunday. These values are noted in Table 3C-3. The CalEEMod default values are comparable to the Proposed Project's trip generation. As discussed in Section 3F of this EIR, the proposed YMCA facility is anticipated to generate a total of 1,204 trips per day. Annual mobile source emissions were derived using an average daily trip rate of 1,430 during the weekday, 906.25 on Saturday, and 1,160.63 on Sunday. In addition to total trips per day, mobile source emissions are a function of trip lengths. Using trip type data based on land use, the Proposed Project is estimated to create 3,388,664 annual vehicle miles traveled (VMT). As shown in Table 3C-3, project-related GHG emissions from mobile sources are estimated to be approximately 1,690.07 $MTCO_2E$ annually.

Table 3C-3. Annual Project Mobile Source GHG Emissions

Source	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_20	Total CO_2E
Mobile[1]	1,688.60	0.07	0.00	1,690.07

Notes:
[1] based on CalEEMod assumed Weekday, Saturday, and Sunday ADT of 1,430, 906.25, and 1160.63, respectively.

Source: Air & Noise Logic, 2012

GHG emissions associated with the disposal of solid waste into landfills were also calculated for the Proposed Project. Total waste-related GHG emissions are based on default data for waste disposal rates, composition, and the characteristics of landfills. The default value is based on an average generation rate for landfills reporting throughout the state of California. GHG emissions resulting from solid waste disposal would total 162.06 $MTCO_2E$ annually, as depicted in Table 3C-4.

Table 3C-4. Annual Project Waste-Related GHG Emissions

Source	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_20	Total CO_2E
Solid Waste	72.32	4.27	0.00	162.06

Source: Air & Noise Logic, 2012

Electricity is also indirectly used in water supply, treatment, and distribution, as well as wastewater treatment and plays a role in GHG production. There are three processes necessary to supply potable water to urban users (i.e. residential, commercial, and industrial): (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, the wastewater is treated and either reused as reclaimed/recycled water or returned to the environment. CalEEMod calculates the GHG emissions from these processes based on default emissions factors and water/wastewater generation rates for a project's location. Default values were used for electricity intensity factor associated with the supply and conveyance of water from its source. The CalEEMod default electricity intensity factor for the supply and conveyance of water in southern California assumes that the water is being imported from northern California.

As shown in Table 3C-5, GHG emissions resulting from water-related energy usage would total 44.59 $MTCO_2E$ annually.

Table 3C-5. Annual Project Water-Related GHG Emissions

Phase	Metric Tons per year (MT/yr)			
	CO_2	CH_4	N_20	Total CO_2E
Water	41.22	0.11	0.00	44.59

Source: Air & Noise Logic, 2012

Combining project-related GHG emissions, the total GHG emissions generated from the Proposed Project is estimated to be 2,344.97 $MTCO_2E$ per year. The total estimated project-related GHG emissions are below the SCAQMD's significance threshold of 3,000 $MTCO_2E$ per year. As is typical of GHG emissions, the majority of emissions result from project-related vehicle use. In this case, 70 percent of project related GHG emissions result from mobile sources. A total of 20 percent of project-related GHG emissions result from natural gas and electricity consumption. Nonetheless, project-related emissions are considered less than significant in light of interim thresholds for GHG emissions.

The Proposed Project would also be compliant with CalGreen, which requires mandatory reductions in energy and water consumption, as well as solid-waste generation. Overall, significant impacts related to GHG emissions would not occur as a result of the Proposed Project.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Impact C-2: Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Less than significant impact

The applicable plan relative to GHG emissions is AB 32 and a variety of GHG control legislation summarized herein. A project that would inhibit AB 32 compliance could have a potentially significant impact. AB 32 requires a 28 percent reduction in "business as usual" practices for individual GHG generators to achieve the specified goal. A substantial percentage of that reduction will derive from national or state GHG reduction programs. The CARB has implemented programs and is developing regulatory action such as the low-

carbon fuel standard as well as passenger vehicle efficiency measures for on-road passenger/light truck transportation. Because the utilization of the Proposed Project would be subject to requirements developed in response to AB 32, the Proposed Project would be consistent with the goals of AB 32. Thus, no GHG emissions impacts relative to conflicts with applicable plans or policies designated to reduce GHG emissions would occur.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

3C.5 CUMULATIVE IMPACTS

Less than significant impact

The Proposed Project will not generate enough GHG emissions to influence global climate change on its own. Rather, it is the accumulation of greenhouse gases from all sources world-wide that may result in the effects of global warming. The Proposed Project would participate in this potential impact by its incremental contribution combined with the cumulative increase of all other sources of GHG. As indicated, the Proposed Project is consistent with adopted GHG reduction strategies including CAT recommended strategies and ARB early action strategies. For these reasons, the Proposed Project's cumulative impact to global climate change would be reduced to less than significant through compliance with state mandated measures to reduce GHG emissions. The Proposed Project would also be located in a dense urban setting that that is currently served by public transportation. The Proposed Project impact on global climate change would be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

Section 3D. Noise

3D.1 INTRODUCTION

This section addresses noise impacts associated with the Proposed Project. It analyzes potential noise impacts caused by both construction and operation of the project on nearby sensitive uses. A *Noise Technical Memorandum* was prepared for the Proposed Project by Air & Noise Logic (March, 2012) and is provided for reference as Appendix D to this EIR.

Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. *Noise* is commonly defined as unwanted sound and sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing background) sound level. Because of the wide range of sound energy that is audible to humans, sound levels are defined using a logarithmic decibel (dB) scale. Thus, a doubling of the energy of a noise source, such as doubling traffic volumes, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease. A 10 dB increase represents a 10-fold (doubling) increase in sound intensity; a 20 dB change is a 100-fold difference; 30 dB is a 1,000-fold increase in perceived loudness.

The human ear is not equally sensitive to all frequencies within the entire spectrum; thus, noise levels are weighted within those frequencies of maximum human sensitivity using a process called "*A-weighting*". Sound levels that have been A weighted are referred to as dBA. Several metrics are used to characterize the time-varying nature of sound. These metrics include the equivalent continuous sound level (L_{eq}), the minimum and maximum sound levels (L_{min} and L_{max}), percentile-exceeded sound levels (L_n), the day-night level (L_{dn}), and the community noise equivalent level (CNEL). The following are brief definitions of these metrics and other terminology used in this section.

- **Sound**. A vibratory disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB)**. A measure of sound on a logarithmic scale, which indicates the squared ratio of sound pressure amplitude to reference sound pressure amplitude. The reference pressure is 20 micro-pascals.

- **A-Weighted Decibel (dBA)**. An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Maximum Sound Level (L_{max})**. The maximum sound level measured during the measurement period of interest.
- **Minimum Sound Level (L_{min})**. The minimum sound level measured during the measurement period of interest.
- **Equivalent Sound Level (L_{eq})**. The equivalent steady-state sound level that in a stated period would contain the same acoustical energy.
- **Percentile-Exceeded Sound Level (L_n).** The sound level exceeded "n" percent of a specific period. For example, L_{10} is the sound level exceeded 10 percent of the time.
- **Day-Night Level (L_{dn})**. The energy average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the A-weighted sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.
- **Community Noise Equivalent Level (CNEL)**. The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added to the A-weighted sound levels occurring during the period from 7:00 p.m. to 10:00 p.m. and 10 dB added to the A-weighted sound levels occurring during the period from 10:00 p.m. to 7:00 a.m.

Table 3D-1 lists typical sound levels measured in the environment and the subjective human response to the various intensities of noise.

Table 3D-1: Typical Sound Levels

Noise Level (dBA)	Common Indoor Noise Levels	Common Outdoor Noise Levels
110	Rock Band	
100	Inside subway train	Jet flyover @1,000 feet Gas lawnmower @ 3 feet
90	Food blender @ 3 feet	Diesel truck @ 3 feet Noisy urban daytime
80	Garbage disposal @ 3 feet Shouting @ 3 feet	
70	Vacuum cleaner @ 10 feet	Gas lawnmower @ 100 feet Commercial area
60	Normal speech @ 3 feet Large business office	Heavy traffic @ 300 feet
50	Dishwasher in next room	Quiet urban daytime
40	Small theatre/conference room	Quiet urban daytime Quiet urban nighttime
30	Library Bedroom at night	
20	Concert hall background Recording studio	Quiet rural nighttime
10		
0	Threshold of hearing	

Source: Air & Noise Logic, 2012

3D.2 EXISTING SETTING

3D.2.1 Noise-Sensitive Land Uses

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically include residences, hospitals, schools, guest lodging, libraries, and certain types of passive recreational uses. Sensitive land uses include the single and multi-family residences located to the east and west of the University High School campus and on-campus classrooms.

The primary source of noise under existing and Proposed Project conditions is traffic operating on the adjacent streets. The site is bordered by Ohio Avenue to the south, South Westgate Avenue to the west and South Barrington Avenue to the east. Traffic on Santa Monica Boulevard, which is located two blocks south of the site, also contributes to the ambient noise environment within the project area. Project-related activities would occur primarily along Ohio Avenue and South Westgate Avenue. Existing uses in the area include commercial uses to the south; multi-family residential uses to the east and west and University High School classrooms to the north. Because the proposed site is located on an existing high school campus and YMCA activities would largely be confined to indoor spaces, traffic operating on adjacent streets would remain the primary

source of noise after construction. Thus, the difference between existing volumes and those that would occur during operation would determine whether the Proposed Project would cause a noise impact. Roadway segments corresponding to the nearest sensitive land use categories were evaluated to establish baseline (existing) noise conditions within the study area. Modeled baseline conditions are shown in Table 3D-2.

Existing noise levels for the Proposed Project area were modeled based on traffic projections and are summarized in Table 3D.2. Predicted noise levels for existing land uses range from 57 dBA to 65 dBA Leq and from 53 dBA to 64 dBA CNEL.

Table 3D-2. Existing Traffic Noise Levels

Roadway Segment	Peak Hour dB(A) Leq	24-Hour dB(A) CNEL
EB Ohio Ave	57	53
WB Ohio Ave	57	56
NB Westgate Ave	64	63
SB Westgate	65	64
NB Barrington Ave	62	61
SB Barrington Ave	62	61

Source: Air & Noise Logic, 2012

3D.3 APPLICABLE REGULATIONS

3D.3.1 Federal Standards

There are no federal noise standards for the construction or operation of a project of this type. However, the U.S. Environmental Protection Agency (EPA) has developed guidelines on recommended maximum noise levels to protect the public health and welfare. Table 3D-3 provides examples of protective noise levels recommended by EPA. The Occupational Safety and Health Administration (OSHA) regulations protect the hearing of workers exposed to occupational noise. (Refer to 29 Code of Federal Regulations [CFR] Section 1910.95 for a listing of permissible noise exposures.)

Table 3D-3. Summary of Noise Levels Identified as Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety

Effect	Level	Area
Hearing Loss	L_{eq} (24) < 70 dB	All areas.
Outdoor Activity Interference and Annoyance	L_{dn} < 55 dB	Outdoor residential areas and farms as well as areas where people spend widely varying amounts of time and other places where quiet is a basis for use.
	L_{dn} (24) < 55 dB	Outdoor areas where people spend limited amounts of time, such as school yards, playgrounds, etc.
Indoor Activity Interference and Annoyance	L_{dn} < 45 dB	Indoor residential areas.
	L_{eq} (24) < 45 dB	Other indoor areas with human activities, such as schools, etc.

Note: L_{eq} (24) represents the sound energy averaged over a 24-hour period.

Source: Air & Noise Logic, 2012

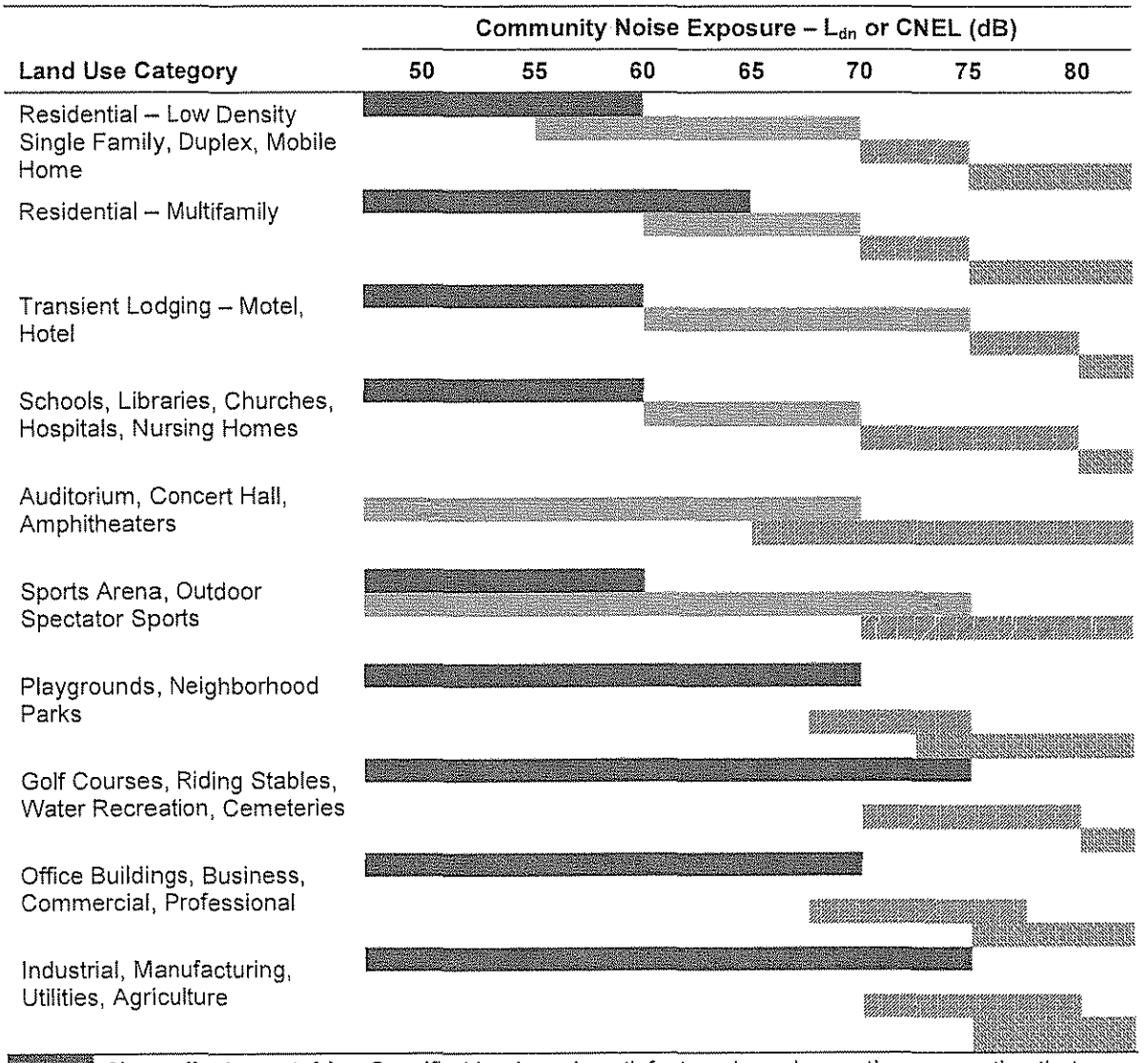
3D.3.2 State Regulations

The state of California Office of Planning and Research requires each local government entity to perform noise studies and implement a noise element as part of its general plan. State land use guidelines for evaluating the compatibility of various land uses as a function of community noise exposure are listed in Table 3D-4.

3D.3.3 California Department of Education Regulations

The California Department of Education (CDE) recognizes that unwanted sound can be distracting and present an obstacle to learning. CDE regulations require school districts assess noise impacts when considering approval of a project. CDE recommends that new projects assess noise from major roadways and railroads (LAUSD PEIR, pg 3.3-6). For projects located near a freeway or other source of noise, CDE recommends hiring an acoustical engineer to determine the level of sound to which the location is subject to and assist in the design as needed to reduce unwanted noise. As discussed, the Proposed Project is not located near a railroad. I-405 is located approximately ¾ of a mile east of the site. Traffic noise on I-405 is not audible from the school campus. Thus, this study focuses on changes in noise levels at sensitive receivers caused by project-related traffic volumes on adjacent streets.

Table 3D-4. State Land Use Compatibility Standards for Community Noise Environment
(Source: LAUSD PEIR)



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

Conditionally Acceptable New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design.

Normally Unacceptable New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirement must be made and needed noise insulation features included in the design.

Clearly Unacceptable New construction or development generally should not be undertaken.

3D.3.4 Local Regulations and Standards

The Proposed Project lies within the jurisdiction of the City of Los Angeles. The City has established policies and regulations concerning the generation and control of noise that could adversely affect its citizens and noise-sensitive land uses.

Los Angeles General Plan Noise Element

Adopted guidelines are included in the *City of Los Angeles General Plan Noise Element*. These guidelines are mainly advisory. If noise levels are estimated to exceed these guidelines, noise mitigation must be evaluated and implemented, where feasible. Noise compatibility guidelines are shown in Table 3D-5.

Table 3D-5. City of Los Angeles Guidelines for Noise Compatible Land Uses

	Day-Night Average Exterior Sound Level (CNEL dB)						
Land Use Category	**50**	**55**	**60**	**65**	**70**	**75**	**80**
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	U	U
Auditorium, Concert Hall, Amphitheatre	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	C	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

Notes:

A = Normally acceptable. Specified land use is satisfactory, based upon assumption buildings involved are conventional construction, Without any special noise insulation.

C = Conditionally acceptable. New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning normally will suffice.

N = Normally unacceptable. New construction or development generally should be discouraged. A detailed analysis of noise insulation features included in the design of a project.

U = Clearly unacceptable. New construction or development generally should not be undertaken.

Source: Air & Noise Logic, 2012

Based on these guidelines, exterior noise impacts upon residential multi-family uses are normally acceptable up to 55 dBA Ldn/CNEL; conditionally acceptable up to 65 dBA Ldn/CNEL. Office and commercial buildings are normally acceptable up to 60 dBA and conditionally acceptable up to 75 dBA Ldn/CNEL.

School buildings are normally acceptable up to 55 dBA and conditionally acceptable up to 65 dBALdn/CNEL. Residential land uses are normally acceptable up to 50 dBA Ldn/CNEL; conditionally acceptable up to 65 dBA Ldn/CNEL. In this regard, the phrase "normally acceptable" is defined by the City as, "specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements." Likewise, the phrase "conditionally acceptable" is defined as "new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements are made, and needed noise insulation features included in the design.

CEQA sets forth guidelines for operational noise. The CEQA Threshold guideline determines that a project would normally have a significant impact on noise levels from project operation if the project causes the ambient noise level measured at the property line of an affected use to increase by 3 dB(A) or more in community noise equivalency level (CNEL). Additionally, there would be an impact if operation noise falls within the "normally unacceptable" or "clearly unacceptable" category of the Land Use Compatibility for Community Noise Exposure guidelines or any 5 dB (A) or greater noise increase.

LAUSD Noise Standards

LAUSD has established maximum allowable noise levels, expressed in terms of L_{eq} or $L_{10,}$ to protect students and staff from noise impacts generated by traffic. The district's noise standards are presented in Table 3D-6 below:

Table 3D-6. Acceptable Operational Vehicular Noise Levels Established by LAUSD

Location	L_{10} Noise Level	L_{eq} Noise Level
Exterior	70 dBA	67 dBA
Interior	55 dBA	45 dBA
Source: LAUSD PEIR, pg 3.3-7		

3D.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3D.4.1 Criteria for Determining Significance

The criteria used to determine the significance of an impact related to noise are based on the model initial study checklist in Appendix G of the CEQA Guidelines and LAUSD standards. In the IS/NOP, it was determined that the Proposed Project may result in potentially significant impacts relating to noise if it would:

- expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies;

- expose persons to or generate excessive levels of ground-borne vibration or ground-borne noise;
- cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or
- cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

3D.4.2 Environmental Impact Analysis

The environmental impact analysis presented below is based on the determinations made in the initial study for issues found to be potentially significant (see NOP/Initial Study, Appendix A).

Impact D-1: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Less than significant impact

Construction Noise

Construction noise impacts are considered significant if they cause a violation of any adopted standards. Time constraints on construction involving heavy equipment use are established by the City of Los Angeles Municipal Code Section. Compliance with these limits will reduce temporary noise impacts during Project construction. The City of Los Angeles Ordinance Section 12.08.440 is summarized in Table 3D-7, Maximum Noise Levels for Mobile Equipment, and in Table 3D-8, Maximum Noise Levels for Stationary Equipment.

Table 3D-7. Maximum Noise Levels for Mobile Equipment

	Single-family Residential	Multi-family Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	65 dBA	70 dBA

Source: Air & Noise Logic, 2012

Table 3D-8. Maximum Noise Levels for Stationary Equipment

	Single-family Residential	Multi-family Residential	Semi-residential/ Commercial
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA

Source: Air & Noise Logic, 2012

Construction of the Proposed Project would take approximately 18 months to complete and would include demolition of existing on-site structures, grading and preparation of the site, construction of the new on-site structure, and finishing.

Construction-related noise levels produced from within a construction site vary according to the size of the site, the amount and type of site preparation required, and the types of equipment used. Project construction will involve multiple phases employing differing types and quantities of mechanical equipment; each will produce varying levels of noise at varying distances from within the active maintenance/construction area. Project related construction noise impacts were evaluated using the U.S. Department of Transportation Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM). The RCNM is the FHWA national model used for the prediction of construction-related noise and to determine compliance with noise limits for a variety of types of construction projects of varying complexity. The RCNM includes an extensive compilation of built-in reference noise levels for dozens of types of construction-related equipment based on manufacturer and actual monitored sources.

There are four areas surrounding the Proposed Project site that represent the closest existing sensitive receptors that could be affected by construction activity:

- Site 1 – Residential uses (multi-family) along South Westgate Avenue;
- Site 2 – Commercial uses along Ohio Avenue;
- Site 3 – University High School On-site Classroom (400 feet northwest of the Project site); and
- Site 4 – University High School On-site Classroom (600 feet northeast of the Project site).

Construction-related noise levels assumes each construction phase occurs independently and the equipment for each phase is running simultaneously and

at the closest point of anticipated construction activity to the four closest sensitive land uses detailed above. The Project area is expected to be constructed in four phases; demolition, grading, construction and finishing. Construction impacts are summarized below for each of the four sites. Assumptions regarding equipment used in each phase and the resulting noise level are provided in Tables 7 through 10 in the Noise Technical Memorandum (see Appendix D).

SITE 1 – Multi-Family Residential along South Westgate Avenue

Site 1 represents the multi-family residential units located approximately 75 feet west of the Project site along South Westgate Avenue. The four construction phases for the Project were evaluated and compared to the 80 dBA construction noise limit for multi-family residential land uses. Based on the results of the RCNM calculations, construction noise would not exceed the maximum noise limits. The evaluation assumed the use of standard equipment such as tractors, bull dozers and dump trucks. Use of construction equipment with an L_{max} of 89 dBA or higher could result in an exceedance of the maximum noise limit. From a distance to receiver of 75 feet, grading and construction equipment (grader and tractor) could result in noise levels of 81.5 dBA (Table 7 in Appendix D). Use of construction equipment would occur in accordance with LAUSD Best Management Practices (BMPs) (discussed in detail below). The BMPs require operational construction equipment to use properly functioning mufflers. According to the City of Los Angeles CEQA Thresholds Guide, equipment with properly functioning mufflers results in a 2 dBA decrease in noise levels at a distance of 50 feet. As the separation distance increases between the source and receiver, noise levels would be reduced even further. Properly functioning equipment with mufflers would reduce potential noise impacts at multi-family residences along South Westgate Avenue. Therefore, use of LAUSD BMPs would reduce potential construction noise impacts to below regulated noise limits and no mitigation is required.

Site 2 – Commercial Uses along Ohio Avenue

Site 2 represents the commercial uses located approximately 50 feet south of the Project site. The four construction phases for the Project were evaluated and compared to the 85 dBA construction noise limit for commercial land uses. Based on the results of the RCNM calculations, construction activities would not exceed the maximum noise limits.

Site 3 – University High School Northwest On-site Classroom

Site 3 represents the classroom units located approximately 400 feet northwest of the Project site. The four construction phases for the Project were evaluated and compared to the 75 dBA construction noise limit for single-family residential (the lowest construction noise threshold) land uses. Demolition activities would create the loudest noise events associated with the project at 71.5 dBA (Table 9 in Appendix D). These levels are within allowable noise standards. Based on the

results of the RCNM calculations demolition, grading, construction and finishing activity would not exceed the maximum noise limits.

Site 4 – University High School Northeast On-site Classroom
Site 4 represents the classroom units located approximately 600 feet northeast of the Project site. The four construction phases for the Project were evaluated and compared to the 75 dBA construction noise limit for single-family residential (the lowest construction noise threshold) land uses. Based on the results of the RCNM calculations demolition, grading, construction and finishing activity would not exceed the maximum noise limits.

To reduce construction noise levels, LAUSD would require its construction contractors to implement LAUSD BMPs. These BMPs may include the following:

- The LAUSD shall require the construction contractor to keep properly functioning mufflers on all internal combustion and vehicle engines used in construction.
- The LAUSD shall require its construction contractor to provide advance notice of the start of construction to all noise sensitive receptors, businesses, and residences adjacent to the project area. The announcement shall state specifically where and when construction activities will occur, and provide contact information for filing noise complaints.
- During construction activities, LAUSD's construction contractor shall serve as the contact person in the event that noise levels become disruptive to local residents.
- During construction activities, the construction contractor shall locate portable equipment and shall store and maintain equipment as far as possible from the adjacent residents.
- The LAUSD shall require the construction contractor to comply with all applicable noise ordinances of the City of Los Angeles. In the event of complaints by nearby residents or receptors, the LAUSD shall monitor noise from the construction activity to ensure that construction noise does not exceed limits specified in the noise ordinance.
- LAUSD shall include the applicable City of Los Angeles requirements in all construction contracts.

Implementation of these BMPs would reduce short-term construction noise to below a level of significance.

Operational Noise

Future predicted traffic noise levels were compared to predicted existing noise levels (see Table 3D-2) to determine if project related traffic noise would cause a

5 dBA increase in CNEL noise levels and whether predicted noise levels are projected to be above the *conditionally acceptable* level detailed in the Land Use Compatibility guidelines (see Table 3D-5).

As detailed in Table 3D-9 below, predicted project traffic noise levels will range from 55.8 dBA to 61.3 dBA. The largest increase in noise levels would occur along northbound South Westgate Avenue with a forecast increase of 0.7 dBA CNEL over predicted (2011) noise conditions. A +/- 3 dBA change is perceptible by the human ear. Changes less than that are inaudible. The predicted noise levels would not exceed the *conditionally acceptable* noise level of 65 dBA CNEL prescribed in the Land Use Compatibility Guidelines and the increase over existing traffic noise levels would not exceed the 3 dBA CNEL CEQA threshold.

Table 3D-9. AM Peak-Hour Traffic Noise Levels Existing (2011) + Project

Roadway Segment	Sensitive Land Use at 50 feet	Predicted	Predicted + Project	Increase Over Predicted
		CNEL	CNEL	
EB Ohio Ave	Commercial	55.7	55.8	0.1
WB Ohio Ave	Commercial	59.0	56.5	-2.5*
NB Westgate Ave	Multi-Family Residential	54.5	55.2	0.7
SB Westgate Ave	Multi-Family Residential	55.8	56.1	0.3
NB Barrington Ave	Classroom	61.4	61.3	-0.1*
SB Barrington Ave	Classroom	61.1	61.0	-0.1*

*Traffic volumes included congestion-related adjustments that decreased traffic volumes on various roadways segments. This adjustment resulted in a decrease in noise levels (Traffic Impact Study for the Proposed Westside Family YMCA Facility Located on the University High School Campus, Crain & Associates, January 2012)

Source: Air & Noise Logic, 2012

As detailed in Table 3D-10 below, predicted existing plus project traffic noise levels will range from 55.8 dBA to 61.8 dBA. The largest increase in noise levels would occur along northbound South Westgate Avenue with a forecast increase of 1.3 dBA CNEL over future (2014) noise conditions. The predicted noise levels do not exceed the *conditionally acceptable* noise level of 65 dBA CNEL prescribed in the Land Use Compatibility Guidelines and the increase over existing traffic noise levels do not exceed the 3 dBA CNEL CEQA threshold.

Table 3D-10. AM Peak-Hour Traffic Noise Levels Future (2014) + Project

Roadway Segment	Sensitive Land Use at 50 feet	Predicted	Predicted + Project Only	Increase Over Predicted
		CNEL	CNEL	
EB Ohio Ave	Commercial	55.7	56.1	0.4
WB Ohio Ave	Commercial	59.0	57.0	-2.0*
NB Westgate Ave	Multi-Family Residential	54.5	55.8	1.3
SB Westgate Ave	Multi-Family Residential	55.8	56.6	0.8
NB Barrington Ave	Classroom	61.4	61.8	0.4
SB Barrington Ave	Classroom	61.1	61.4	0.3

*Traffic volumes included congestion-related adjustments that decreased traffic volumes on various roadways segments. This adjustment resulted in a decrease in noise levels (Traffic Impact Study for the Proposed Westside Family YMCA Facility Located on the University High School Campus, Crain & Associates, January 2012)

Source: Air & Noise Logic

Mitigation Measures

No mitigation measures would be required to reduce, minimize or reduce construction or operational noise associated with the Proposed Project.

Residual Impacts

Compliance with LAUSD's BMPs would comprise all feasible mitigation intended to reduce construction noise levels at nearby residential receptors. Compliance with the City's noise ordinance would also ensure noise from construction activities is limited to the least noise-sensitive portions of the day to further reduce noise. With implementation of these measures, construction noise would be reduced to below a level of significance.

Impact D-2: Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise.

Less than significant impact

Both construction and operation of land development projects can generate groundborne vibration. In general, demolition of structures, concrete and pavement generates the highest vibrations. Vibratory compactors or rollers, pile drivers, and pavement breakers can generate perceptible vibration as can heavy trucks depending on vehicle type, weight, and pavement conditions. The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations; thus, these criteria are widely used to evaluate potential vibration impacts associated with construction activities. The Peak Particle Velocity (PPV) for various pieces of construction equipment are listed in Table 3D-11. A damage and annoyance calculation for operation of a

large dozer (representative of worst case) was performed to determine potential vibration impacts to surrounding land uses from construction activities associated with the Proposed Project. The results are shown in Table 3D-11:

Table 3D-11. Vibration Levels of Construction Equipment

Site	Description	Distance (feet)	PPV[a] at 100 ft (in/sec)	Vibration Decibels (VdB)
Site 1	Residential (multi-family) along Westgate Avenue	75	0.0171	74.7
Site 2	Commercial uses along Ohio Avenue	50	0.0315	79.9
Site 3	On-site Classroom (400 feet NW of the Project site)	400	0.0014	52.9
Site 4	On-site Classroom (600 feet NE of the Project site)	600	0.0007	47.6

Source: Air & Noise Logic, 2012

As shown, the vibration level of construction equipment at the nearest sensitive receptors identified in Site 1, Site 2, Site 3 and Site 4, would be less than the FTA damage threshold of 0.12 inch per second PPV for fragile historic buildings and would not exceed the FTA threshold for human annoyance of 80 VdB (FTA, Transit Noise and Vibration Impact Assessment, Ch. 8, Vibration Impact Criteria). Thus, construction of the Proposed Project would not generate groundborne vibration impacts.

Operation of the YMCA facility and parking structure would not involve sources of groundborne vibration or groundborne noise. Thus, operation of the Proposed Project would result in no impact.

Mitigation Measures

No mitigation measures would be required to reduce, minimize or reduce groundborne vibration associated construction or operation of the Proposed Project.

Residual Impacts

Impacts would be less than significant.

Impact D-3: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Less than significant impact

Construction of the Proposed Project would generate short-term intermittent increases in noise associated with construction activities. However, this increase would not be permanent and would end when construction is complete.

As detailed in Table 3D-9, predicted existing (2011) plus project traffic noise levels will range from 55.8 dBA to 61.3 dBA. The predicted noise levels do not exceed the *conditionally acceptable* noise level of 65 dBA CNEL prescribed in the Land Use Compatibility Guidelines and the increase over existing traffic noise levels do not exceed the 3 dBA CNEL CEQA threshold.

As detailed in Table 3D-10, predicted future (2014) plus project traffic noise levels will range from 55.8 dBA to 61.3 dBA. The predicted noise levels do not exceed the *conditionally acceptable* noise level of 65 dBA CNEL prescribed in the Land Use Compatibility Guidelines and the increase over existing traffic noise levels do not exceed the 3 dBA CNEL CEQA threshold.

Future project-related traffic noise would be similar to conditions without the Proposed Project and inaudible over background noise. Overall project related traffic would generate less than a 5 dB(A) increase. Further, the Proposed Project would not cause a 3 dB(A) increase in CNEL levels in the project area and impacts would be less than significant in accordance with CEQA criteria. No substantial permanent increase in ambient noise levels related to project traffic noise would occur.

Mitigation Measures

No mitigation would be required.

Residual Impacts

Impacts would be less than significant.

Impact D-4: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Less than significant impact

As discussed, operation of the project would not create an increase in ambient noise levels above existing levels.

Construction of the Proposed Project would generate short-term intermittent increases in noise associated with construction activities. Construction of the

Proposed Project may generate noise levels audible at adjacent properties; however, noise levels would not exceed the thresholds defined within the City of Los Angeles Ordinance Section 12.08.440.

The Proposed Project site may be used for periodic community events during off-hours. Such events would not be expected to increase ambient sound levels beyond significance thresholds as each would be evaluated and approved by LAUSD and YMCA officials prior to approval of the activity. Thus, noise levels associated with the operation of the school and school functions, including community events scheduled at the school, would not create a substantial periodic increase in ambient noise levels in the project vicinity above levels existing without the Proposed Project. Impacts under this threshold would be less than significant

Mitigation Measures

No mitigation measures would be required to reduce, minimize or reduce construction noise associated with the Proposed Project.

Residual Impacts

Impacts would be significant and unavoidable.

3D.5 CUMULATIVE NOISE IMPACTS

Less than significant impact

Cumulative noise impacts could occur from the development of other projects within the area. Approximately five projects in the general vicinity (within a 0.5-mile radius) could generate noise impacts similar to those of the Proposed Project. The project area along with the surrounding vicinity is essentially built out and any development is replacing existing structures, as is the case with the YMCA project. The projects proposed for the area include new commercial and residential uses, which are in character with the largely residential and commercial nature of the area. These uses are not expected to incorporate stationary or other noise sources to change the noise signature within the immediate area surrounding the project site. Such projects could represent a more intensive use of existing residential and commercial lands, and provide an associated incremental rise in traffic levels and traffic noise. Such increases would be consistent with expected future growth within the area. The construction of each project would implement recommended conditions and mitigation measures to adhere to the City of Los Angeles noise ordinance and the California Health and Safety Code. Thus, cumulative noise impacts would not be significant.

Mitigation Measures

No mitigation would be required.

Residual Impacts

Impacts would not be cumulatively considerable.

Section 3E. Public Services – Fire Protection and Emergency Medical Services

3E.1 INTRODUCTION

This section focuses on the impact that the Proposed Project may have specifically on fire and emergency medical services provided by the City of Los Angeles Fire Department (LAFD) and County of Los Angeles Fire Department. As described in the Initial Study, Section 5.15 (see Appendix A), project-related impacts to police protection, school facilities, parks, and other public services were found to be less than significant and do not require further analysis within this EIR.

3E.2 EXISTING ENVIRONMENTAL SETTING

The primary responder to the proposed site is the Fire Station 59, located at 11505 Olympic Boulevard, approximately 1.5 miles southeast of the Proposed Project site (ZIMAS, 2011). Secondary fire protection services could be provided by Fire Station 19, located at 12229 West Sunset Boulevard, approximately 1.8 miles northwest of the project site, or Fire Station 37, located at 1090 Veteran Avenue, approximately 1.7 miles northeast of the project site (LAFD, 2011).

The adequacy of fire protection services is based on required fire flow, the response distance from existing stations, population density, and the LAFD's judgment for needs in the area. Required fire flow, (water pressure and quantity of water necessary for fire protection), varies with the type of development, life hazard, occupancy type, and the degree of fire hazard. The adequacy of fire suppression also depends on the ability of the Fire Department to successfully access the project site and surrounding streets, and strategically place on-site fire suppression systems.

3E.3 APPLICABLE REGULATIONS

Chapter 5 Article 7 (Fire Code) of the Los Angeles Municipal Code addresses fire protection and prevention in the City of Los Angeles. Section 57.01.02 describes the Fire Code as prescribing laws for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises; and to prescribe such other laws as it may be the duty of the Fire Department to enforce. Section 57.01.07 asserts the Fire Code applies to all buildings, structures, or premises located within the City including the buildings, structures, or premises owned or directly controlled by the City of Los Angeles, or any County or other municipal or quasi-municipal corporation or government or any department, commission, board of office thereof (LAMC). The City of Los Angeles Fire Department maintains a set of regulations to identify and eliminate hazardous conditions which pose a threat

to life, the environment and property. These regulations address items such as fire sprinkler systems, fire lanes, visibility of building addresses, and public safety in general (LA Fire Code).

3E.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3E.4.1 Methodology

The Traffic Impact Study (March, 2012) prepared for the Proposed Project evaluated project-related traffic volumes and related impacts to the operation of intersections surrounding the project site. Level of service can affect fire department response times; thus, whether an impact to fire and emergency services would occur is in part based on whether response times would be affected by project-related traffic.

3E.4.2 Criteria for Determining Significance

In addition to potential traffic-related response time delays, criteria used to determine the significance of the Proposed Project's impacts on public services are also based on the thresholds of significance found within Appendix G of the CEQA Guidelines. In the IS/NOP, it was determined that the Proposed Project may result in potentially significant impacts related to public services if it would:

- Result in substantial adverse physical impacts creating the need for new or physically altered fire protection facilities to maintain acceptable service ratios, response times or other performance objectives.

3E.4.3 Project Impacts

The environmental impact analysis presented herein is based on determinations made as a result of the IS/NOP review process. Comments were received that indicated LAFD response times and/or other factors related to providing fire and emergency medical services may be adversely affected by the Proposed Project.

Impact E-1: Result in unacceptable service ratios, response times or other performance objectives for fire protection services?

Less than significant impact

Impacts to fire service providers can occur as a result of a population increase within the geographic area served; the number and types of service calls received; physical development constraints; or a conflict with any applicable plan, policy, or regulation of an agency responsible for providing fire services (PEIR, p. 3.15-15 and 3.15-16.). The construction of the Proposed Project is intended to establish a joint community facility that would provide programming and services complementing the academic and physical fitness programs of both the LAUSD and YMCA. The new joint-use facility would not induce population growth but rather accommodate recreational needs of people already living in the area and

existing University High School students, faculty and staff. Thus, no new LAFD facilities would be needed to improve response times or otherwise serve the Proposed Project.

The IS/NOP for the Proposed Project raised the issue that service ratios, response times or other performance objectives may be affected if significant traffic impacts result from the Proposed Project. As indicated in Section 3F, Transportation and Traffic of this EIR, traffic generated by the Proposed Project would not cause a decrease in Level of Service at any of the intersections studied or otherwise cause traffic impacts. Thus, there would be no indirect impact to the provision of fire and emergency medical services as a result of the Proposed Project.

Construction of the Proposed Project would comply with applicable state and local fire codes (Uniform Fire Code), ordinances, and plans. The Proposed Project is not anticipated to impact LAFD's ability to maintain adequate fire protection service to the area as the Proposed Project would not disrupt existing fire protection response times or access to the project site as noted above. Further, the Proposed Project would comply with applicable fire protection requirements. Thus, it would not result in the need for new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Project impacts on fire protection services would be less than significant.

3E.5 CUMULATIVE IMPACTS

Less than significant impact

This analysis is based on the list of related projects provided in Tables 2-1 and 2-2. The listed projects include other projects currently under construction, approved but not built, or proposed for development and that may substantially affect traffic conditions. Those projects identified in Tables 2-1 and 2-2 could cumulatively impact fire service if they would result in an overall increase in population and structures requiring fire protection service. Many of the cumulative projects identified within the City of Los Angeles are replacing existing structures; thus, overall, those projects would not increase or induce population growth or create new facilities requiring fire protection. Cumulative projects within the City of Santa Monica would be addressed by the local fire department. As described herein, the Proposed Project would not result in direct project-related impacts to the LAFD Fire Station 59 or any other fire station serving the University High School campus. Therefore, while cumulative growth in the area

may require new and expanded fire protection facilities, the Proposed Project's cumulative contribution to fire protection impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Section 3F. Traffic and Circulation

3F.1 INTRODUCTION

This section discusses potential impacts to transportation facilities, parking, and related issues regarding site ingress and egress resulting from the Proposed Project. This discussion is based on the results of the Traffic Impact Study for the *Proposed Westside Family YMCA Facility Located on the University High School Campus* conducted by Crain & Associates, for the Proposed Project (March, 2012). The complete Traffic Impact Study is provided as Appendix E of this EIR.

3F.2 EXISTING ENVIRONMENTAL SETTING

3F.2.1 Regional Highway Network

The Proposed Project is located in the City of Los Angeles, within Los Angeles County. The vicinity of the project site includes the San Diego Freeway and Santa Monica Freeway which is further described as follows:

- The San Diego Freeway (I-405) is approximately three-quarters of one mile east of the project site, extending from the northern part of the San Fernando Valley, through Los Angeles County, and into Orange County. It generally provides four lanes in each direction, along with high-occupancy vehicle (HOV) lanes along much of its route. In the study area, the San Diego Freeway runs north-south, interchanges with the Santa Monica Freeway, and has full or partial ramp connections at Wilshire Boulevard, Santa Monica Boulevard, and Olympic/Pico Boulevards. Based on the most recent available data provided by the State of California Department of Transportation (Caltrans), the San Diego Freeway carried approximately 287,000 vehicles per day, between Santa Monica Boulevard and Wilshire Boulevard in 2010.

- The Santa Monica Freeway (I-10), approximately one mile to the south, extends easterly from the City of Santa Monica, through Downtown Los Angeles, and continues easterly as the San Bernardino Freeway. The Santa Monica Freeway generally has four lanes per direction (no HOV lanes) in the study area. It interchanges with the San Diego Freeway, and has full or partial ramp connections at Centinela Avenue and Bundy Drive. In 2010, the Santa Monica Freeway carried approximately 192,000 vehicles per day, between Centinela Avenue and Bundy Drive.

3F.2.2 Local Roadway Network

The local roadway network surrounding the Proposed Project consists of a grid of major arterial and local roadways oriented in north–south and east–west directions. North-south arterials providing primary project site access include Bundy Drive and South

Barrington Avenue. Wilshire Boulevard and Santa Monica Boulevard are the east-west arterials providing primary site access. The following describes each of the key roadways in the area of the Proposed Project.

- Santa Monica Boulevard (SR-2), an east-west arterial one block south of the site, is designated a Major Highway Class II in the project vicinity. The roadway extends from the City of Santa Monica to the Silver Lake community. Through the study area, Santa Monica Boulevard provides two travel lanes in each direction, with left-turn channelization and on-street parking. The number of travel lanes increases to three in each direction when parking is prohibited during the weekday peak periods of 7:00 to 9:00 AM and 4:00 to 6:00 PM. East of the project site, full ramp access is provided with the San Diego Freeway.

- Wilshire Boulevard is another vital transportation facility in the area, providing an east-west connection between the City of Santa Monica and Downtown Los Angeles. Between the Santa Monica/Los Angeles City limit and Federal Avenue, this roadway is designated a Major Highway Class II. In the study area, Wilshire Boulevard provides two travel lanes in each direction, with left-turn channelization at key intersections and on street parking. The number of travel lanes increases to three in each direction when parking is prohibited during the weekday peak periods of 7:00 to 9:00 AM and 4:00 to 7:00 PM. East of the project site, full ramp access is provided with the San Diego Freeway.

- Ohio Avenue forms the southern boundary of the project site. This roadway is designated a Local Street, between the Santa Monica/Los Angeles City limit and South Barrington Avenue, and a Collector Street, from South Barrington Avenue to east of the San Diego Freeway. Within the City of Los Angeles, Ohio Avenue extends discontinuously from Centinela Avenue to Thayer Avenue. In the study area, Ohio Avenue provides one travel lane in each direction, with left-turn channelization at key intersections (such as with South Barrington Avenue). Near the project site, on-street parking is allowed on both sides between South Westgate Avenue and Stoner Avenue, with various restrictions. East of Stoner Avenue, no parking is allowed on the north side of the street while parking is allowed on the south side of the street.

- Bundy Drive, a north-south arterial a few blocks west of the site. The roadway extends from north of San Vicente Boulevard southerly to National Boulevard, where it becomes Centinela Avenue. Between San Vicente Boulevard and Wilshire Boulevard, Bundy Drive is designated a Collector Street and provides one travel lane in each direction with limited on-street parking. Between Wilshire Boulevard and Pico Boulevard, Bundy Drive is designated a Secondary Highway and provides two travel lanes per direction, with left-turn channelization at key intersections and limited on-street parking in some areas.

- Brockton Avenue is a north-south Local Street located two blocks west of the project site. In the study area, Brockton Avenue provides one travel lane in each direction,

with on-street parking provided. South Westgate Avenue is a north-south oriented facility that forms the western boundary of the project site. This facility provides discontinuous service from just north of Sunset Boulevard to Clarkson Road. South Westgate Avenue is designated a Collector Street, between Wilshire Boulevard and La Grange Avenue, but is otherwise designated a Local Street. In the study area, the roadway provides one travel lane in each direction, with on-street parking.

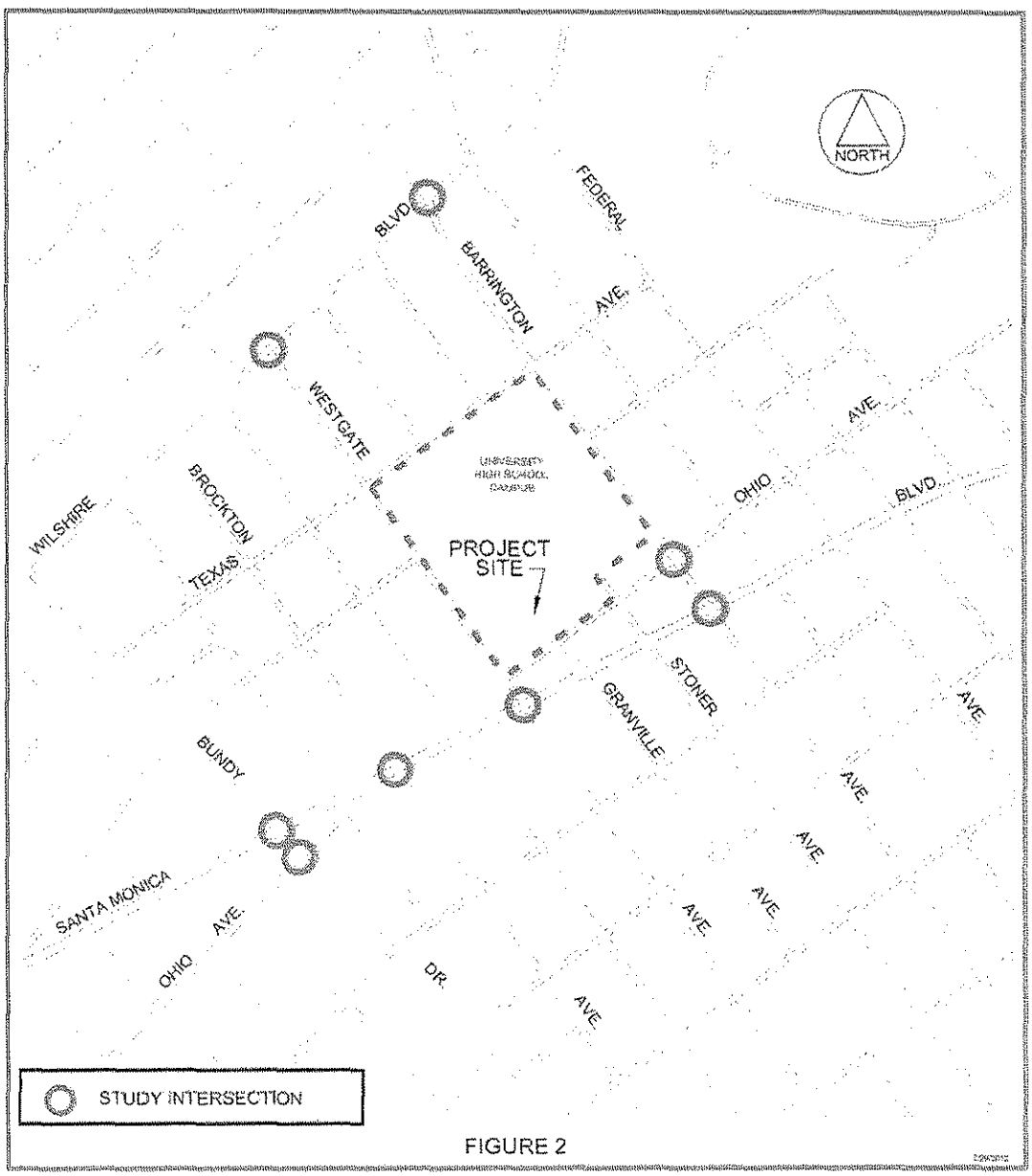
- South Barrington Avenue is a north-south Secondary Highway in the study area and provides service from north of Sunset Boulevard to south of National Boulevard, where it becomes McLaughlin Avenue. South Barrington Avenue generally provides one travel lane per direction, except at Wilshire Boulevard and to the south of Olympic Boulevard where it widens to provide two lanes per direction. Full left-turn channelization is provided at the intersections with Wilshire Boulevard, Ohio Avenue, and Santa Monica Boulevard. On-street parking is generally permitted, except on the west side of this facility adjacent to the University High School campus where parking is not allowed from 7:00 AM to 5:00 PM on school days (school buses exempted).

The eight study intersections listed below were analyzed to determine existing traffic conditions and comprise the scope of intersections evaluated as part of the Traffic Impact Study. Study intersections were selected in consultation with the City of Los Angeles Department of Transportation (LADOT). Per current LADOT policy, only signalized locations should be included in traffic impact analyses for development projects. The eight intersections listed below are currently signalized. Unsignalized intersections are evaluated to determine the need for installation of a traffic signal or other traffic control device to achieve acceptable operation.

Figure 3F-1 shows the location of the project study area and location of the following study intersections:

- Wilshire Boulevard and South Westgate Avenue;
- Wilshire Boulevard and South Barrington Avenue;
- Ohio Avenue and South Barrington Avenue;
- Santa Monica Boulevard and Bundy Drive;
- Santa Monica Boulevard and Brockton Avenue;
- Santa Monica Boulevard and South Westgate Avenue;
- Santa Monica Boulevard and South Barrington Avenue; and
- Ohio Avenue and Bundy Drive.

Figure 3F-1. Study Intersection Locations



The project site falls within the ordinance area of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). The surrounding neighborhood area is currently developed primarily with multi-family residential uses, public facilities (e.g., University High School), and commercial uses along the Santa Monica Boulevard and Wilshire Boulevard corridors.

The area is served by a well-developed local and regional transportation system. Two freeways (i.e., I-10 and I-405) are located within approximately one mile of the project site. In addition to the regional freeway facilities, several major and secondary highways serve the project vicinity, along with a well-developed local street grid.

3F.2.3 Existing Transit Operations

The project area is served by bus lines operated by the Los Angeles County Metropolitan Transit Authority (Metro) and the Santa Monica Big Blue Bus (SMBBB). These bus lines are located within convenient walking distance (one-quarter mile) of the project area and offer multiple connection opportunities to regional transit services offered by Metro, SMBBB, and other transit providers.

Metro Local Line 4 provides local service between downtown Santa Monica and downtown Los Angeles. Line 4 travels primarily along Santa Monica Boulevard and then on Sunset Boulevard further east approaching downtown Los Angeles. In the immediate project vicinity, Line 4 provides a bus stop at the intersection of Santa Monica Boulevard and South Westgate Avenue. West of I-405, Line 4 provides only late night/owl service with bus routes running generally between 7:00 PM and 7:00 AM on weekdays, between 6:30 PM and 7:30 AM on Saturdays, and between 6:30 PM and 8:00 AM on Sundays and holidays.

Metro Rapid Line 704 provides rapid bus service between downtown Santa Monica and downtown Los Angeles. Line 704 follows a route similar to Metro Local Line 4 but makes fewer stops. In the immediate project vicinity, Line 704 provides a bus stop at the intersection of Santa Monica Boulevard and South Barrington Avenue. Buses are provided generally between 5:30 AM and 9:00 PM on weekdays, between 6:00 AM and 8:30 PM on Saturdays, and between 7:00 AM and 8:30 PM on Sundays and holidays.

SMBBB Line 1 provides service between the community of Venice and the University of California, Los Angeles (UCLA). SMBBB Line 1 also serves the City of Santa Monica and West Los Angeles, following a route generally along Main Street, Ocean Avenue, Broadway, Santa Monica Boulevard, and Westwood Boulevard. In the immediate project vicinity, Line 1 provides a bus stop at the intersection of Santa Monica Boulevard and Westgate Avenue. Buses are generally provided between 5:30 AM and 12:30 AM on weekdays, between 5:30 AM and 12:30 AM on Saturdays, and between 6:00 AM and 12:30 AM on Sundays and holidays.

SMBBB Line 11 provides service between the Santa Monica College main campus and UCLA. SMBBB Line 11 also serves the City of Santa Monica and West Los Angeles,

following a route generally along Pico Boulevard, 20th Street, Santa Monica Boulevard, Westwood Boulevard, and Hilgard Avenue. In the immediate project vicinity, Line 11 provides a bus stop at the intersection of Santa Monica Boulevard and South Westgate Avenue. Buses generally operate between 7:30 AM and 2:00 PM on weekdays, with no service provided on Saturdays, Sundays, or holidays.

3F.2.4 Existing Area Intersection Traffic Conditions

The LADOT traffic study guidelines require the use of the Critical Movement Analysis (CMA) methodology to analyze signalized intersections. Using the CMA procedures, a determination can be made of the operating characteristics of an intersection based on Level of Service for different traffic volumes and other variables including critical signal phases and the number and type of traffic lanes.

The term "Level of Service" (LOS) describes the quality of traffic flow. LOS A to C is indicative of excellent to good traffic flow conditions. LOS D corresponds to fair conditions that may experience substantial delay during portions of the peak hours, but without excessive backups. LOS E represents poor conditions, with volumes at or near capacity of the intersection and long lines of vehicles that may have to wait through several signal cycles. LOS F is characteristic of failure (i.e., the intersection is overloaded, vehicular movements may be restricted or prevented, and delays and queue lengths become increasingly longer).

A determination of the LOS at an intersection can be obtained through a summation of the critical movement volumes on a per lane basis at that intersection. Critical movement volumes are the highest total conflicting traffic for each signal phase. Once the sum of the critical movement volumes has been obtained, the values in Table 3F-1 can be used to determine the applicable LOS.

Table 3F-1. Critical Movement Volume Ranges* For Determining Levels of Service (LOS)

	Maximum Sum of Critical Volumes (Vehicles/Hour)		
LOS	**Two Phases**	**Three Phases**	**Four or More Phases**
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA

Source: Crain & Associates, 2012

Capacity is the total maximum hourly volume of vehicles in the intersection critical lanes that has a reasonable expectation of passing through the intersection under the prevailing roadway and traffic conditions. For planning purposes, the capacity for

signalized intersections equates to the maximum critical movement value at LOS E, as indicated in Table 3F-1.

The CMA values used in this study were calculated by dividing the sum of the critical movement volumes by the appropriate capacity value for signal control present or proposed at the subject intersection. A description of the different LOS and their corresponding CMA values is shown in Table 3F-2.

Table 3F-2. Level of Service (LOS) As a Function of CMA Values

LOS	Range of CMA Values
A	0.000 - 0.600
B	0.601 - 0.700
C	0.701 - 0.800
D	0.801 - 0.900
E	0.901 - 1.000
F	≥ 1.001

Source: Crain & Associates, 2012

Applying this analysis procedure, the CMA value and corresponding LOS are calculated for each study intersection. The standard CMA calculations are also adjusted to account for signal enhancements not considered in the CMA methodology.

All of the study intersections within the study area are operating under the City's Automated Traffic Surveillance and Control (ATSAC) system and are tentatively scheduled to be further upgraded to the Adaptive Traffic Control System (ATCS) in the latter part of FY 2011-2012. ATSAC/ATCS is a computerized system that continually monitors traffic demand at signalized intersections within the system and modifies signal timing in real time to maximize capacity and decrease overall delay. The ATSAC system has been recognized to increase intersection capacity by approximately seven percent. The upgrade to ATCS is able to increase capacity by an additional three percent, resulting in a total 10 percent increase in intersection capacity. Therefore, per LADOT policy, the standard CMA values at the City of Los Angeles study intersections were decreased by 0.070 where only ATSAC is in effect and by 0.100 where ATSAC/ATCS is in effect.

In consultation with LADOT staff, further adjustments to the standard CMA methodology were utilized to account for the increased eastbound congestion currently experienced along the east-west corridors of Wilshire Boulevard, Ohio Avenue, and Santa Monica Boulevard due to the I-405 Sepulveda Pass Improvements Project. In conjunction with the construction of the I-405 Sepulveda Pass Improvements Project, traffic operations have temporarily deteriorated at interchange intersections accessing I-405. Subsequently, the resulting congestion from these intersections has affected upstream intersections along east-west corridors, including some within this traffic study area.

Based on observations in the field during the collection of the traffic count data (and verified by a review of those data and historical count data), the eastbound congestion and vehicle queuing limited the traffic volume throughput at several study intersections during the AM and PM peak hours. The following intersections (and peak hours) were affected:

- Wilshire Boulevard and South Westgate Avenue (AM and PM peak hours);
- Wilshire Boulevard and South Barrington Avenue (AM and PM peak hours);
- Ohio Avenue and South Barrington Avenue (PM peak hour);
- Santa Monica Boulevard and Brockton Avenue (PM peak hour);
- Santa Monica Boulevard and South Westgate Avenue (PM peak hour); and
- Santa Monica Boulevard and South Barrington Avenue (PM peak hour).

To appropriately evaluate traffic conditions at these affected locations, the following adjusted CMA methodology was developed in coordination with LADOT staff:

- Intersection traffic counts conducted prior to the freeway improvement project (in 2006 and 2008 (shown in Appendix A of the Traffic Impact Study) when traffic volume throughput was not limited, were used to establish baseline existing intersection traffic volumes. These 2006 and 2008 traffic volumes were increased to 2011 conditions by way of a 1.0 percent ambient traffic growth factor. These adjusted 2011 traffic volumes represent the theoretical demands that exist at these intersections but are unable to be processed due to the downstream congestion. Additionally, the lane capacities for eastbound turning movements and those movements feeding into the eastbound traffic stream (i.e., northbound right-turns and southbound left-turns) were reduced to 60 percent of their standard volumes. Finally, because the congestion associated with the freeway improvement project affects the ability of the ATSAC system to progress traffic along the street system, no credit for ATSAC-related capacity increases was applied to any of the study intersections (including those intersections not directly affected by the congestion).

This adjusted CMA methodology was applied to the affected intersections under Existing (2011) Traffic Conditions. Existing (2011) peak-hour traffic volumes, with the aforementioned congestion-related adjustments, are shown on Figures 3F-2 and 3F-3. The analysis of Existing (2011) AM and PM peak-hour conditions at the study intersections is summarized in Table 3F-3 (CMA calculation worksheets are contained in Appendix E of the Traffic Impact Study).

As shown in Table 3F-3, five of the study intersections are currently operating at LOS C or better during both peak hours, one is operating at LOS D or better during both peak hours, and two are operating at LOS E or F during one or both peak hours.

Table 3F-3. Critical Movement Analysis (CMA) & Level of Service (LOS) Summary
Existing (2011) Traffic Conditions

No.	Intersection	Peak Hour	CMA	LOS
1	Wilshire Boulevard and	AM	0.702	C
	Westgate Avenue	PM	0.675	B
2	Wilshire Boulevard and	AM	1.033	F
	Barrington Avenue	PM	0.923	E
3	Ohio Avenue and	AM	0.693	B
	Barrington Avenue	PM	0.833	D
4	Santa Monica Boulevard and	AM	0.693	B
	Bundy Drive	PM	0.769	C
5	Santa Monica Boulevard and	AM	0.433	A
	Brockton Avenue	PM	0.646	B
6	Santa Monica Boulevard and	AM	0.455	A
	Westgate Avenue	PM	0.786	C
7	Santa Monica Boulevard and	AM	0.735	C
	Barrington Avenue	PM	0.974	E
8	Ohio Avenue and	AM	0.653	B
	Bundy Drive	PM	0.633	B

Source: Crain & Associates, 2012

Figure 3F-2. Existing 2011 AM Traffic Volumes

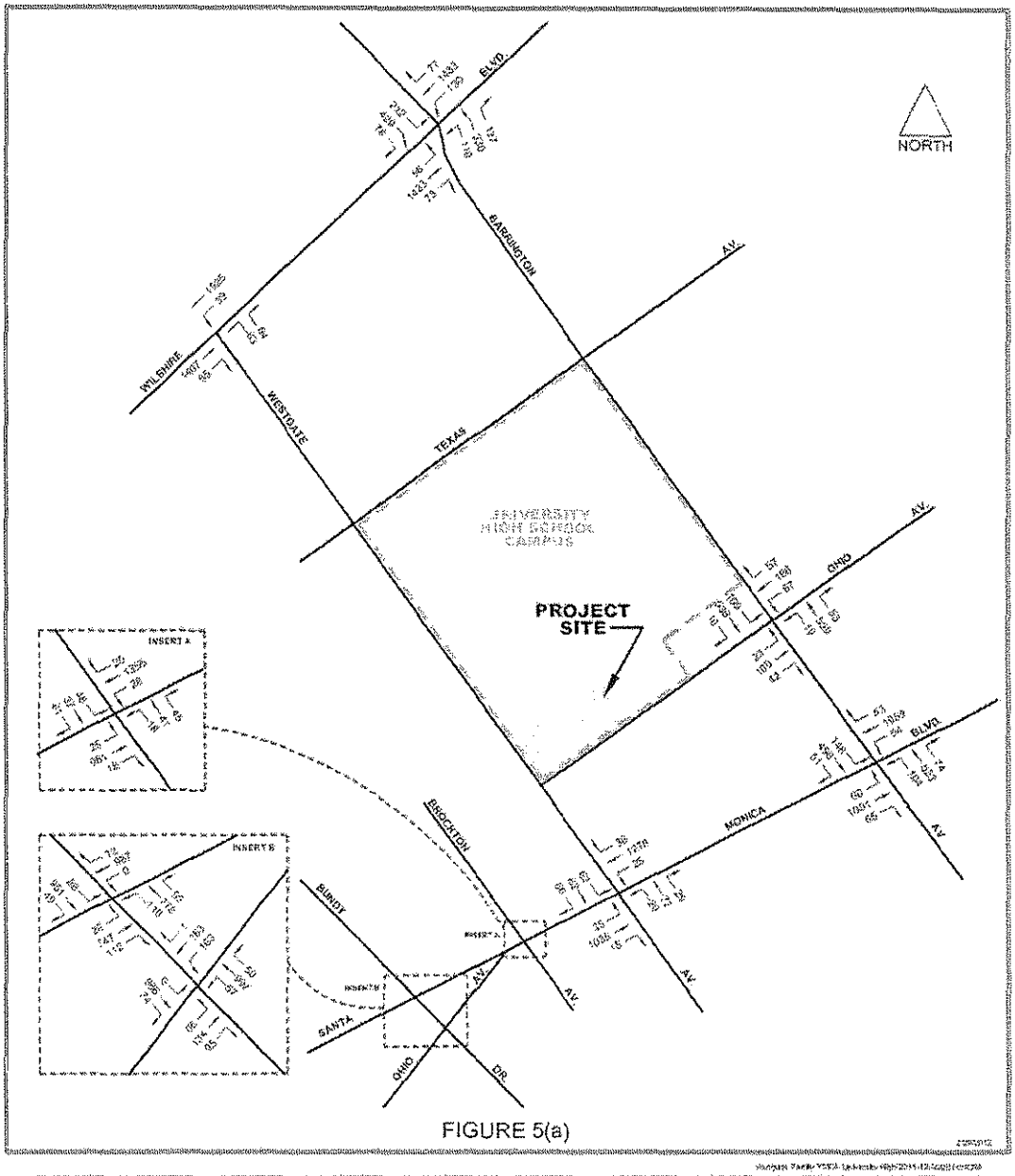
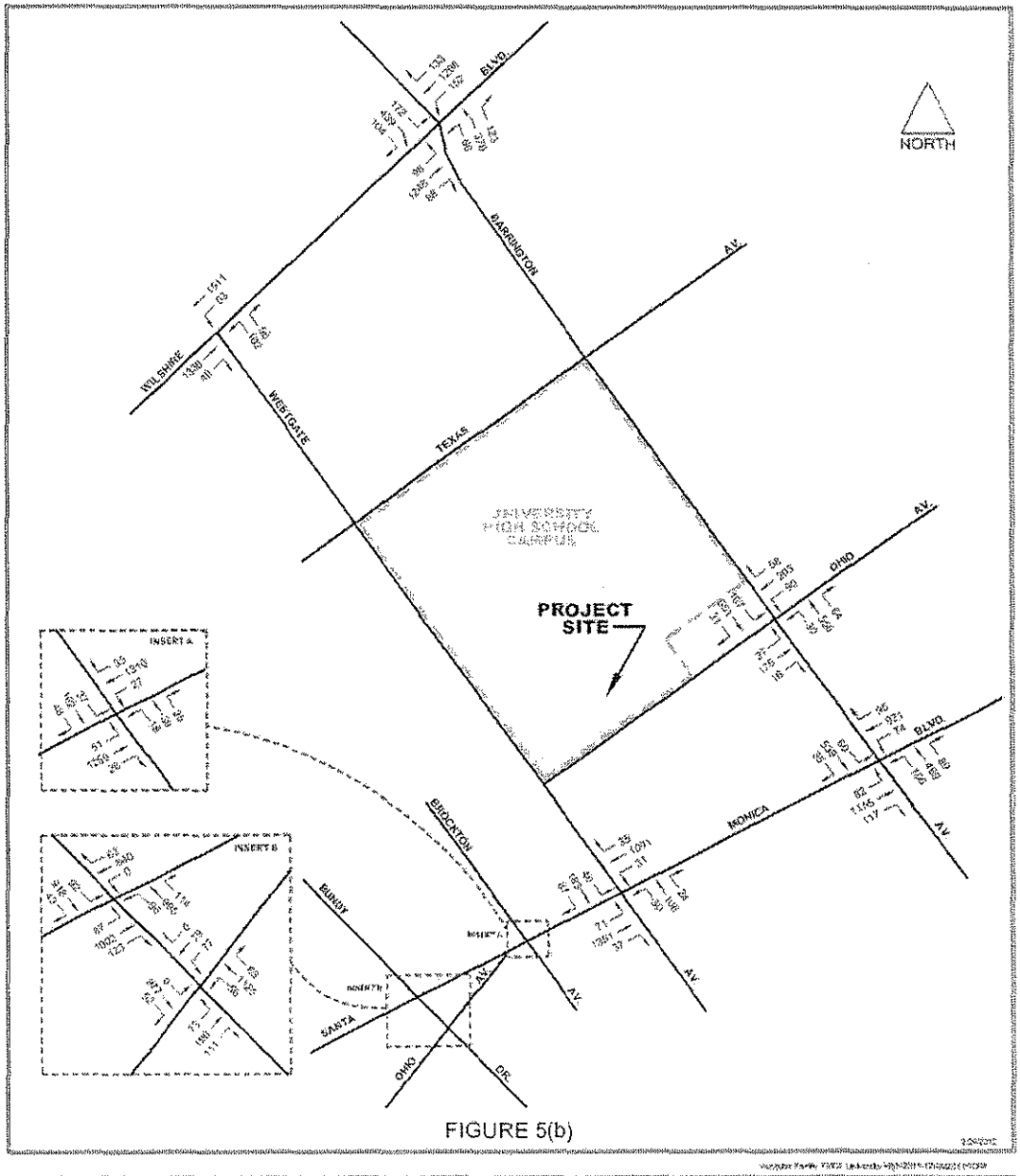


FIGURE 5(a)

EXISTING (2011) TRAFFIC VOLUMES
AM PEAK HOUR
WITH CONGESTION-RELATED ADJUSTMENTS

CRAIN & ASSOCIATES
Transportation Planning
Traffic Engineering

Figure 3F-3. Existing 2011 PM Traffic Volumes



3F.2.5 Existing Area Parking Supply

Parking for the Proposed Project would be provided in accordance with YMCA program requirements and will be reviewed by Division of the State Architect (DSA) prior to approval of construction drawings. The Proposed Project would provide parking via a 186-space, multi-level parking structure. If necessary, an additional 145 parking spaces would be available for use by YMCA staff and guests in various University High School campus parking lots per the joint use agreement between the YMCA and LAUSD.

3F.3 APPLICABLE REGULATIONS

3F.3.1 California Department of Transportation

The California Vehicle Code establishes height, weight, length, and width restrictions for vehicles and their loads. Vehicles or loads that exceed these limitations are considered oversize and require a special permit to operate on the state highway system. The code authorizes the California Department of Transportation (Caltrans) to issue special permits for the movement of these oversize vehicles along specified routes on the state highway system. The code authorizes county and city governments, such as Los Angeles, to issue special permits for movement of oversize vehicles through their jurisdictions (California DMV, 2008).

3F.3.2 City of Los Angeles

The City of Los Angeles Department of Transportation (LADOT) is responsible for transportation planning and engineering within the city limits. As noted, the project area falls within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). This traffic analysis was prepared in coordination with LADOT and pursuant to the assumptions, methodologies and procedures outlined in the LADOT *Traffic Study Policies and Procedures* (December 2010), as well as in accordance with the WLA TIMP. The analysis herein is also consistent with the guidelines in the Los Angeles County Congestion Management Program (CMP).

3F.3.3 County of Los Angeles

New projects within the city must comply with the Congestion Management Program (CMP) for Los Angeles County. The CMP involves monitoring traffic conditions on the designated transportation network, performance measures, analysis of the impact of land use decisions, and mitigation to reduce impacts. The LOS at each CMP monitoring station is supervised by local jurisdictions in order to implement the statutory requirements of the CMP. If Level of Service deteriorates, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined in the countywide plan.

The CMP guidelines require analysis at monitored street intersections and segments, including freeway on- or off-ramp intersections, at which a project is expected to add 50

or more peak-hour vehicle trips, and mainline freeway or ramp monitoring locations where the project will add 150 or more peak-hour trips. If a project does not add but merely shifts the trips at a given monitoring location, the CMP analysis is not required.

3F.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3F.4.1 Methodology

As noted, this traffic analysis summarizes the results of the Traffic Impact Study (Appendix E), which was prepared in coordination with LADOT and pursuant to the assumptions, methodologies and procedures outlined in the LADOT *Traffic Study Policies and Procedures* (December 2010), as well as in accordance with the WLA TIMP.

LADOT defines a significant intersection traffic impact attributable to a project based on a "stepped scale", with intersections experiencing high CMA values being more sensitive to additional traffic than those operating with more available capacity. According to LADOT policy, a significant impact is identified as an increase in the CMA value resulting from project-related traffic of 0.010 or more when the final (with project) LOS is E or F; a CMA increase of 0.020 or more when the final LOS is D; or an increase of 0.040 or more when the final LOS is C. These criteria are summarized in Table 3F-4.

Table 3F-4. LADOT Criteria for Significant Intersection Traffic Impacts

LOS	Final CMA Value	Project-Related Increase in CMA Value
C	> 0.700 - 0.800	equal to or greater than 0.040
D	> 0.800 - 0.900	equal to or greater than 0.020
E, F	> 0.900	equal to or greater than 0.010

Source: Crain & Associates

Data Collection and Field Surveys

Traffic volumes for existing conditions were obtained from manual traffic counts conducted at the eight study intersections in April, May, and June 2011. In accordance with the current LADOT guidelines, the intersection traffic counts for this study were completed on a typical weekday during the morning and afternoon peak commute periods, which range from 7:00 to 10:00 AM and 3:00 to 6:00 PM, respectively (intersection count data sheets are provided in Appendix A of the Traffic Impact Study). Information pertaining to intersection characteristics, such as geometrics, traffic signal operations, and on-street parking restrictions were obtained from field checks and City engineering plans (the existing lane configurations and traffic control conditions for the study intersections are illustrated in Appendix B of the Traffic Impact Study).

Trip Generation

Estimated trip generation is based on the Institute of Transportation Engineers (ITE) Trip Generation (8th Edition, 2008) manual and the WLA TIMP. For this project, the trip generation rates for a "Recreation Community Center" (ITE Land Use Code 495) were used to generate the peak-hour and daily traffic volumes. ITE trip generation rates do not account for trip-reducing factors germane to the Proposed Project such as internally captured trips, significant transit usage, and/or walk-in potential.

Given that the Proposed Project would be located on the University High School campus, it is expected that there would be "internal" or "multi-purpose" trip interactions between the YMCA facility and the school. As part of the project, direct pedestrian access between the YMCA facility and the school would be provided, allowing an internal linkage between the two uses. It is anticipated that LAUSD faculty, staff, and students would patronize the proposed YMCA facility thereby reducing some of the trips that the Proposed Project would otherwise generate. As noted, the site is well served by various transit operators which provide both local and regional routes that would be readily accessible to project patrons and employees. Therefore, adjustments were made to the trip generation to account for transit use. Walk trips to and from the project are also expected. Given that the YMCA facility would serve primarily the local Westside community, it is expected that people working and living in the area would consider walking to and from the proposed facility. This walk-in patronage would reduce the number of vehicle trips generated.

The transit/walk credit for the Proposed Project was determined based on the guidelines provided in the LADOT *Traffic Study Policies & Procedures* (December 2010). Given that the proposed YMCA facility is located within a one-quarter mile walking distance of a Metro Rapid bus stop, the Proposed Project qualifies for a combined transit/walk trip reduction of up to 15 percent. To provide a conservative estimate of project-related vehicle trips, a transit/walk credit of 10 percent was assumed. This transit/walk percentage has been approved by LADOT staff.

Based on trip generation rates and aforementioned trip reduction factors, projections of the amount of new traffic to be generated by the project were derived. No trip credit was applied for the removal of the existing YMCA facility located at 11311 La Grange Avenue to provide a conservative analysis of potential traffic impacts. Table 3F-4 summarizes the trip generation for the Proposed Project. As shown in Table 3F-5, once completed and occupied, the proposed YMCA facility is anticipated to generate a total of 1,204 trips per day, with 85 trips during the AM peak hour and 73 trips during the PM peak hour. These peak-hour trips were used to analyze project impacts at all of the study intersections.

Table 3F-5. Project Trip Generation

Proposed Use and Size	Daily	AM Peak Hour I/B	AM Peak Hour O/B	AM Peak Hour Total	PM Peak Hour I/B	PM Peak Hour O/B	PM Peak Hour Total
65,000 Square-Foot YMCA Facility	1,487	64	41	105	33	57	90
Less 10% Internal Trips	(149)	(6)	(4)	(10)	(3)	(6)	(9)
Less 10% Transit/Walk Trips	(134)	(6)	(4)	(10)	(3)	(5)	(8)
Net Vehicle Trips:	**1,204**	**52**	**33**	**85**	**27**	**46**	**73**

Source: Crain & Associates, 2012

Trip Distribution and Assignment

Estimation of the geographic distribution of project trips was considered in the evaluation of potential traffic impacts. The primary factor affecting the trip distribution pattern is the relative distribution of population from which patrons and employees of the proposed YMCA facility would be drawn. Trip-making patterns and land use in the project area were analyzed, and directional trip distribution percentages were developed as shown in Table 3F-6. LADOT approved these trip distribution assumptions. Trip distribution was then disaggregated and assigned to specific routes and intersections expected to be used by vehicles accessing the new facility as illustrated on Figure 3F-4. Applying these inbound and outbound percentages to the project trip generation, the traffic volumes for the Proposed Project were determined for the study intersections. Proposed Project only AM and PM peak-hour traffic volumes are depicted on Figures 3F-5 and 3F-6.

Table 3F-6. Directional Trip Distribution Percentages

Direction	Project Percentage
North	15%
South	25%
East	30%
West	30%

Source: Crain & Associates, 2012

3F-4. Trip Distribution Percentages

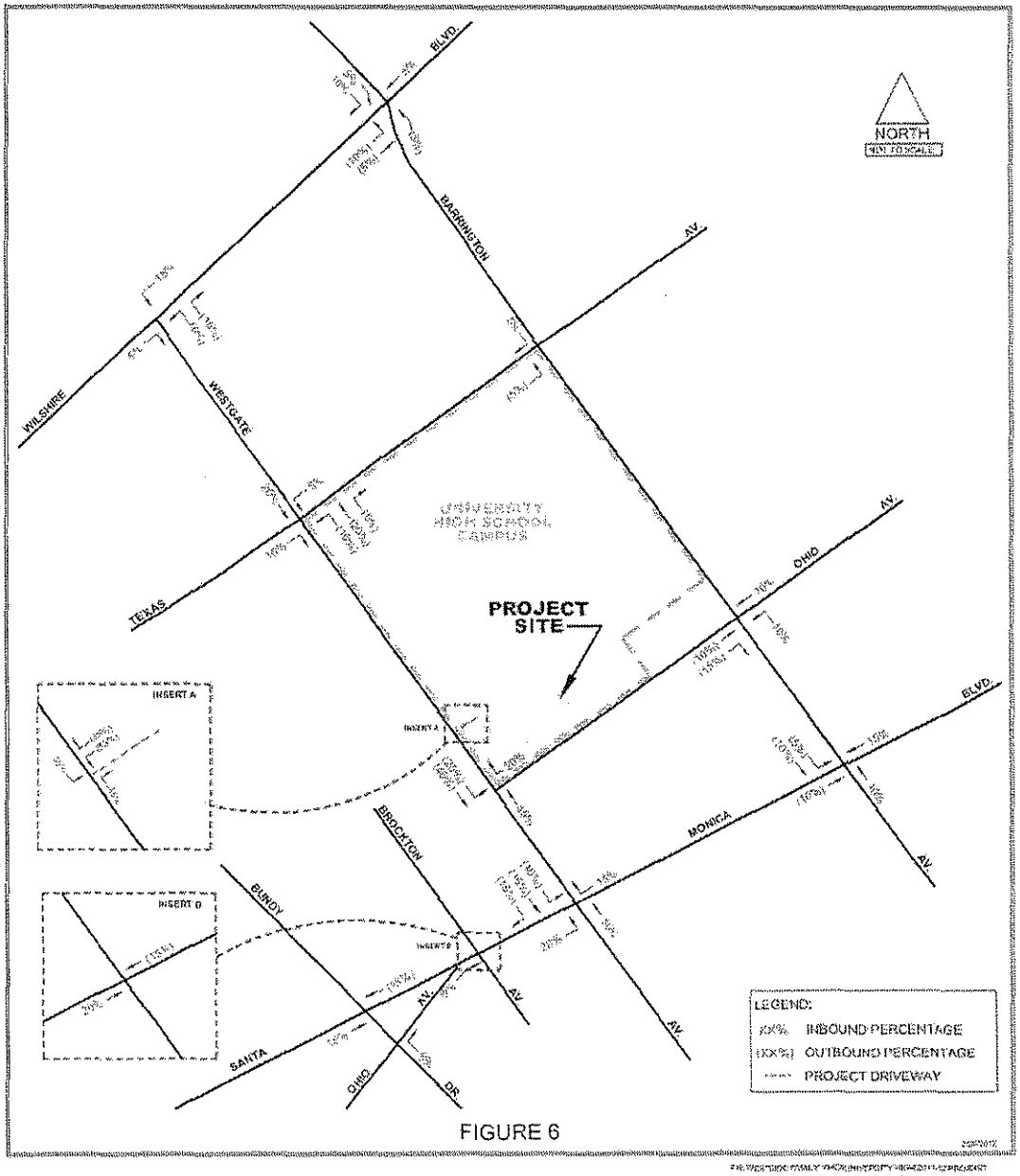


FIGURE 6

PROJECT TRIP DISTRIBUTION PERCENTAGES

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3F-5. Project Only Traffic Volumes AM Peak

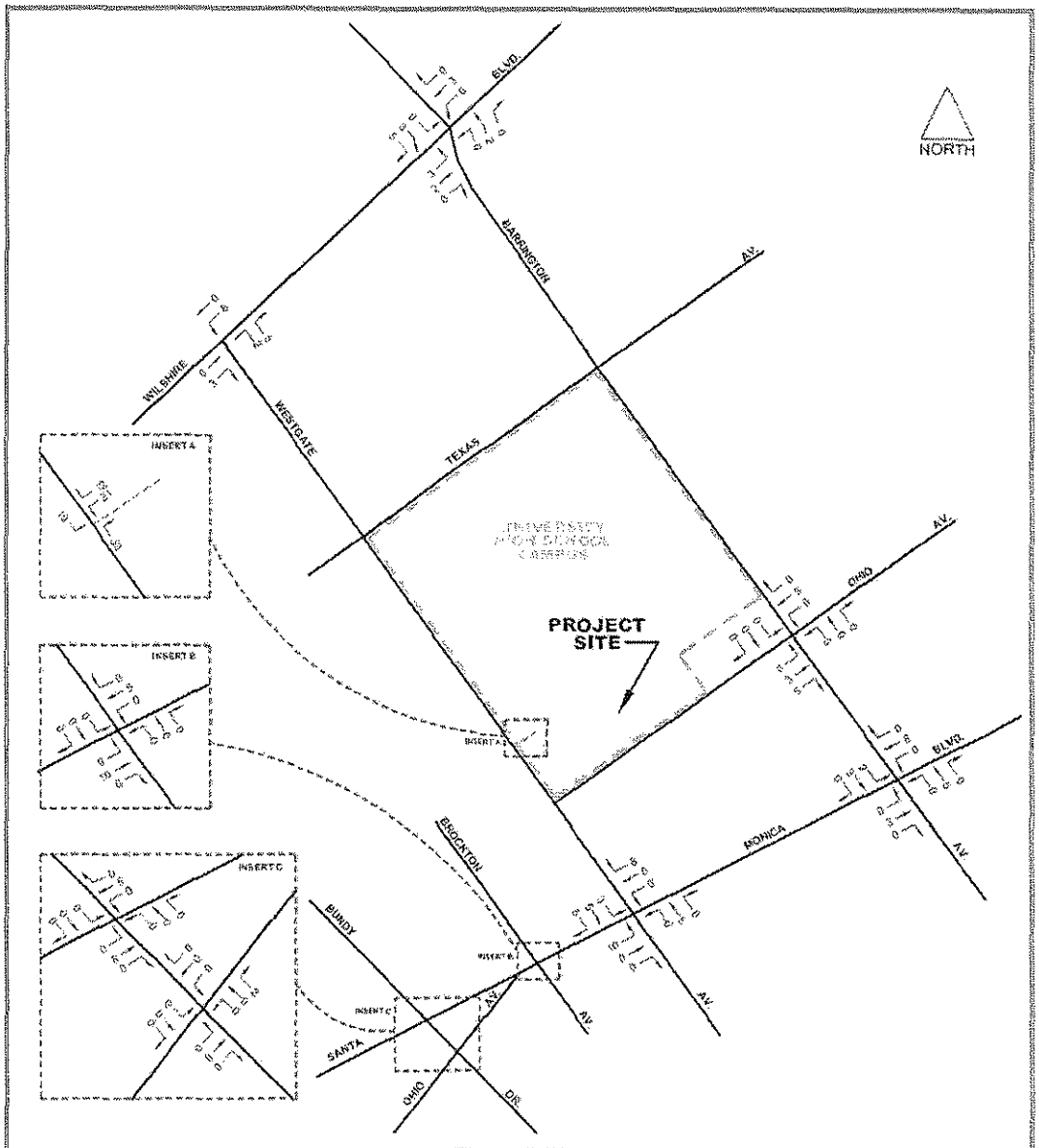

FIGURE 7(a)

PROJECT ONLY TRAFFIC VOLUMES
AM PEAK HOUR

CRAIN & ASSOCIATES

3F-6. Project Only Traffic Volumes PM Peak

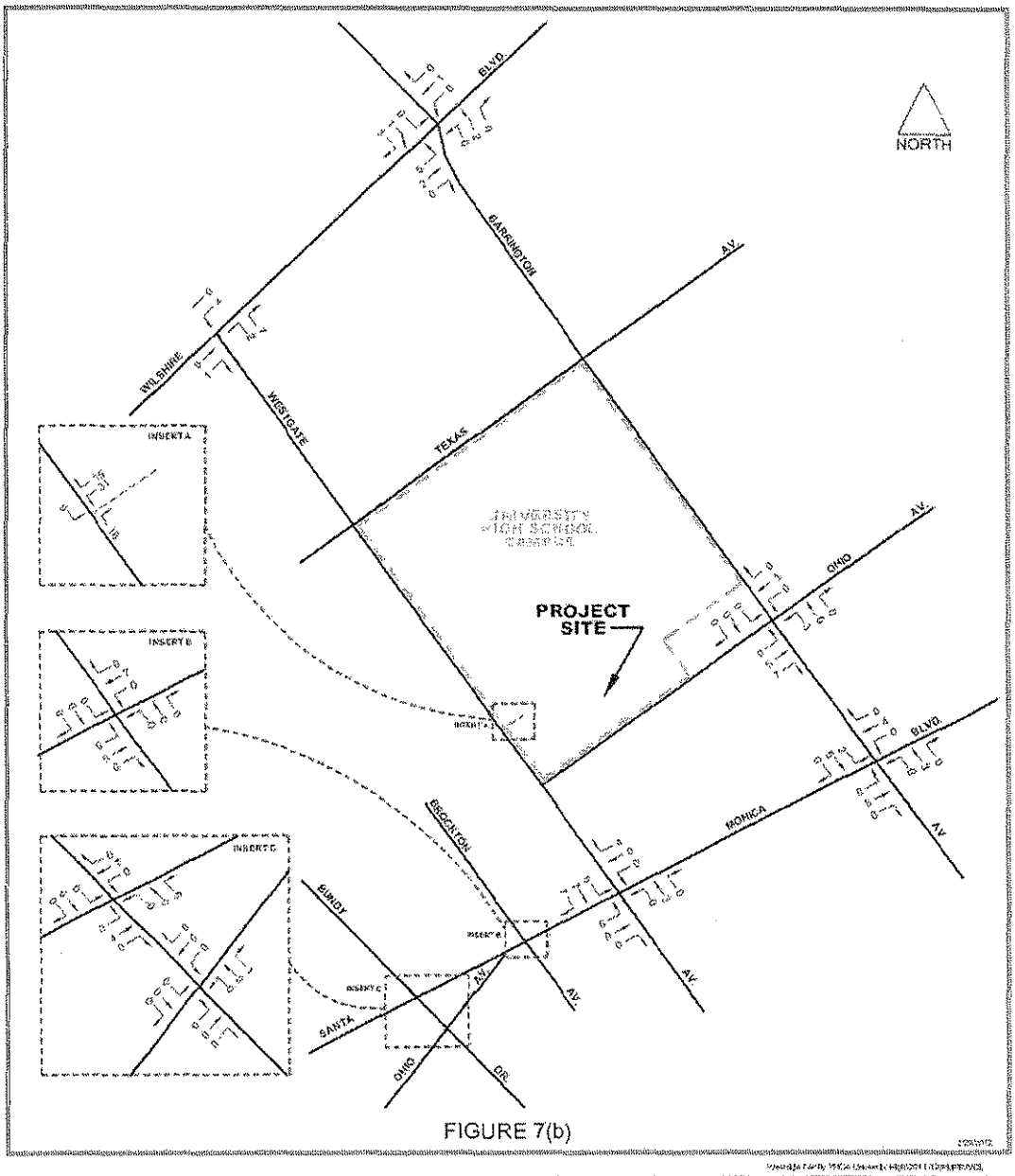

FIGURE 7(b)

PROJECT ONLY TRAFFIC VOLUMES
PM PEAK HOUR

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Existing Plus Traffic Project Conditions

Based on the December 16, 2010, decision of the California Sixth District Court of Appeal in the *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* case, an additional traffic impact analysis has been performed for the Proposed Project. In the *Sunnyvale* case, the Court of Appeal found, based on the facts of that case, the impacts of the project must be compared "against current, existing physical conditions." While the facts of the *Sunnyvale* case may be distinguishable from this case, in the interest of full disclosure an analysis of Existing (2011) Plus Project AM and PM peak-hour conditions was performed.

Future Traffic Conditions

There are a number of other projects either under construction or planned for development in the surrounding area that may contribute future traffic to the study area. For this reason, the analysis of future traffic conditions was expanded to include potential traffic volume increases expected to be generated by those projects. For the analysis of future conditions, an ambient traffic growth factor of 1.0 percent per year, compounded annually, was applied to the Existing (2011) traffic volumes at the eight study intersections to develop future year (2014) baseline traffic volumes. The Proposed Project is tentatively scheduled to be completed in the earlier part of 2014; therefore, 2014 was selected as the future study year.

The inclusion of the annual growth factor generally accounts for area-wide traffic increases. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by "related projects" in the study area was also added to the future baseline traffic volumes. Listings of potential projects located in the surrounding area that might be developed or under construction within the study time frame were obtained from the LADOT, City of Los Angeles Planning Department, and City of Santa Monica Planning Department. Recently published traffic studies and environmental reports for development projects in the area were also reviewed. Related projects from these sources and within an approximate 2.0-mile radius of the project site were included. Refinement of the information resulted in a total of 64 related projects in the surrounding area that could add traffic to the study intersections.

The total future volumes, including those due to related projects, formed the basis for the Future (2014) Without Project condition. Finally, the traffic expected to be generated by the Proposed Project was analyzed as an incremental addition to the Future (2014) Without Project condition, resulting in the Future (2014) With Project condition.

Highway System Improvements

A review of the current City of Los Angeles Capital Improvement Program (CIP) and Bureau of Engineering Street Improvement Master Schedule did not reveal any improvement projects that would significantly affect the study locations, other than the ATCS upgrade to the eight study intersection traffic signals tentatively scheduled for the latter part of FY 2011-2012.

One future roadway improvement identified in the CIP and Street Improvement Master Schedule involves the widening of Bundy Drive, between Wilshire Boulevard and Santa Monica Boulevard, to Modified Secondary Highway standards. This widening would be accomplished by eliminating the existing 'jut-outs" on both sides of the roadway to provide two through travel lanes with left-turn pockets and parking in each direction. The roadway improvement would not add additional through lanes to this portion of Bundy Drive. This project is estimated to be in the pre-construction, right-of-way acquisition stage at the start of 2014. It was assumed that this future improvement would not affect traffic conditions in the study area under the future (2014) traffic conditions analyzed for the Proposed Project.

The aforementioned I-405 Sepulveda Pass Improvements Project is a planned improvement in the general vicinity of the proposed project. Recently, a high-occupancy vehicle (HOV) lane was added to the southbound I-405 Freeway, completing the continuous HOV lane extending from the US-101 Freeway to the I-5 Freeway in Orange County. Construction is now underway to add a northbound HOV lane and widen existing northbound lanes from National Boulevard to just south of the US-101 interchange, thereby providing a continuous northbound HOV lane between the I-5 Freeway in Orange County and the US-101 Freeway. This improvement project is expected to be completed by mid-2013. Therefore, as noted previously, the analysis of future (2014) traffic conditions does not include the lane capacity and ATSAC-related adjustments assumed under the existing (2011) conditions analysis.

According to LADOT, the upgrade of the eight study area traffic signals to the combined ATSAC/ATCS is tentatively scheduled for the latter part of FY 2011-2012. However, given that the funding for these improvements has not been entirely secured, these improvements have not been assumed under the analysis of the future (2014) traffic conditions. The absence of the ATCS traffic signal upgrades in the future (2014) traffic conditions analysis provides a more conservative analysis framework for estimating project-related traffic impacts.

3F.4.2 Criteria for Determining Significance

The criteria used to determine the significance of the Proposed Project's impacts on traffic and transportation are based on the Initial Study checklist in Appendix G of the CEQA Guidelines. In the IS/NOP, it was determined that the Proposed Project may result in potentially significant impacts relating to traffic and transportation if it would:

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

- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

3F.4.3 Environmental Impact Analysis

The environmental impact analyses presented below is based on the determinations made in the IS/NOP for issues that were determined to be potentially significant or issues identified by reviewing agencies, organizations, or individuals commenting in the IS that made a reasonable argument that the issue was potentially significant (see IS/NOP).

Impact F-1: Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

Less than significant impact

Future (2014) baseline traffic volumes for the Without Project condition were determined by superimposing area-wide ambient traffic growth and the total related projects traffic volumes onto the existing (2011) traffic volumes. As noted, the proposed YMCA facility is anticipated to generate a total of 1,204 trips per day, with 85 trips during the AM peak hour and 73 trips during the PM peak hour. These peak-hour trips were used to analyze project impacts at all of the study intersections under future conditions. The results of the analysis of existing and future traffic conditions at the study intersections are summarized in Table 3F-7. As shown in Table 3F-7, the addition of project-related traffic to existing traffic conditions would not deteriorate the LOS at any study intersections.

Under Existing (2011) Plus Project conditions (Sunnyvale), five of the study intersections would continue to operate at LOS C or better during both peak hours, one would operate at LOS D or better during both peak hours, and two would operate at LOS E or F during one or both peak hours.

Under Future (2014) Without Project and Future (2014) With Project conditions, traffic operations are expected to improve over existing conditions following the completion of the I-405 Sepulveda Pass Improvements Project. Under both future conditions, six of the study intersections would operate at LOS C or better during both peak hours, while two intersections would operate at LOS D or better during both peak hours. The addition of project-related traffic would not deteriorate the LOS at any of the study intersections during either peak hour.

Table 3F-7. Critical Movement Analysis (CMA) & Level of Service (LOS) Summary Existing (2011) and Future (2014) Traffic Conditions

			Existing (2011) Conditions						Future (2014) Conditions					
			Existing		Plus Project				Without Project		With Project			
No.	Intersection	Peak Hour	CMA	LOS	CMA	LOS	Impact	Sig.?	CMA	LOS	CMA	LOS	Impact	Sig.?
1	Wilshire Blvd. &	AM	0.702	C	0.715	C	0.013	No	0.421	A	0.432	A	0.011	No
	Westgate Ave.	PM	0.675	B	0.688	B	0.013	No	0.439	A	0.449	A	0.010	No
2	Wilshire Blvd. &	AM	1.033	F	1.034	F	0.001	No	0.665	B	0.665	B	0.000	No
	Barrington Ave.	PM	0.923	E	0.925	E	0.002	No	0.667	B	0.669	B	0.002	No
3	Ohio Ave. &	AM	0.693	B	0.698	B	0.005	No	0.683	B	0.689	B	0.006	No
	Barrington Ave.	PM	0.833	D	0.847	D	0.014	No	0.687	B	0.695	B	0.008	No
4	Santa Monica Blvd. &	AM	0.693	B	0.696	B	0.003	No	0.737	C	0.740	C	0.003	No
	Bundy Dr.	PM	0.769	C	0.770	C	0.001	No	0.873	D	0.875	D	0.002	No
5	Santa Monica Blvd. &	AM	0.433	A	0.434	A	0.001	No	0.425	A	0.426	A	0.001	No
	Brockton Ave.	PM	0.646	B	0.648	B	0.002	No	0.455	A	0.456	A	0.001	No
6	Santa Monica Blvd. &	AM	0.455	A	0.473	A	0.018	No	0.461	A	0.479	A	0.018	No
	Westgate Ave.	PM	0.786	C	0.801	D	0.015	No	0.573	A	0.585	A	0.012	No
7	Santa Monica Blvd. &	AM	0.735	C	0.741	C	0.006	No	0.759	C	0.765	C	0.006	No
	Barrington Ave.	PM	0.974	E	0.979	E	0.005	No	0.847	D	0.852	D	0.005	No
8	Ohio Ave. &	AM	0.653	B	0.653	B	0.000	No	0.704	C	0.704	C	0.000	No
	Bundy Dr.	PM	0.633	B	0.633	B	0.000	No	0.707	C	0.707	C	0.000	No

Source: Crain & Associates, 2012

According to LADOT policy, a significant impact is identified as an increase in the CMA value resulting from project-related traffic of 0.010 or more when the final (with project) LOS is E or F; a CMA increase of 0.020 or more when the final LOS is D; or an increase of 0.040 or more when the final LOS is C. No significant impacts are identified at LOS A or B. Based on these criteria, the Proposed Project is not expected to significantly impact any of the study intersections during either AM or PM peak hour. Future (2014) With Project Traffic Volumes during the AM and PM Peak Hour are depicted in Figures 3F-7 and 3F-8, respectively.

Figure 3F-7. Future With Project AM Peak

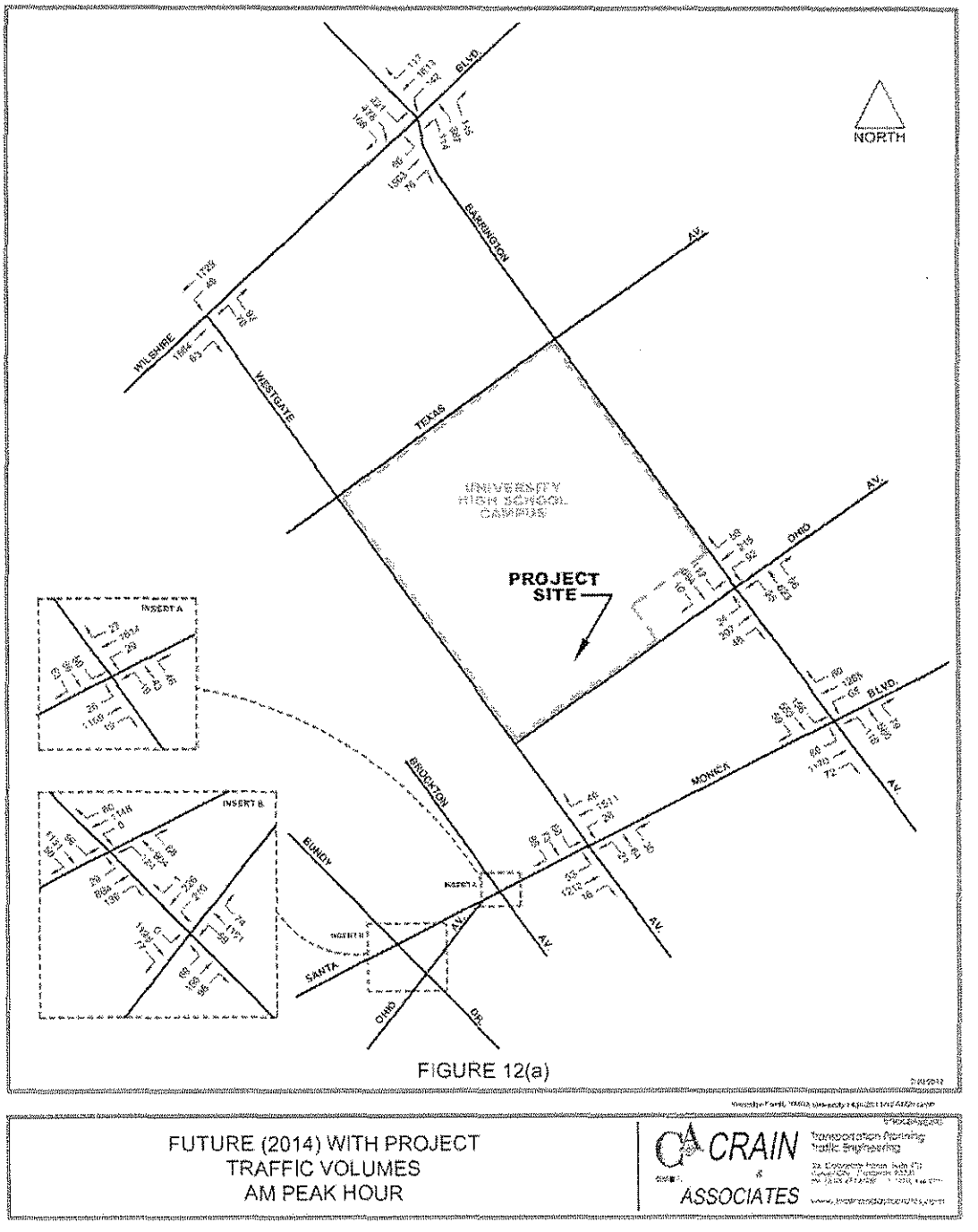
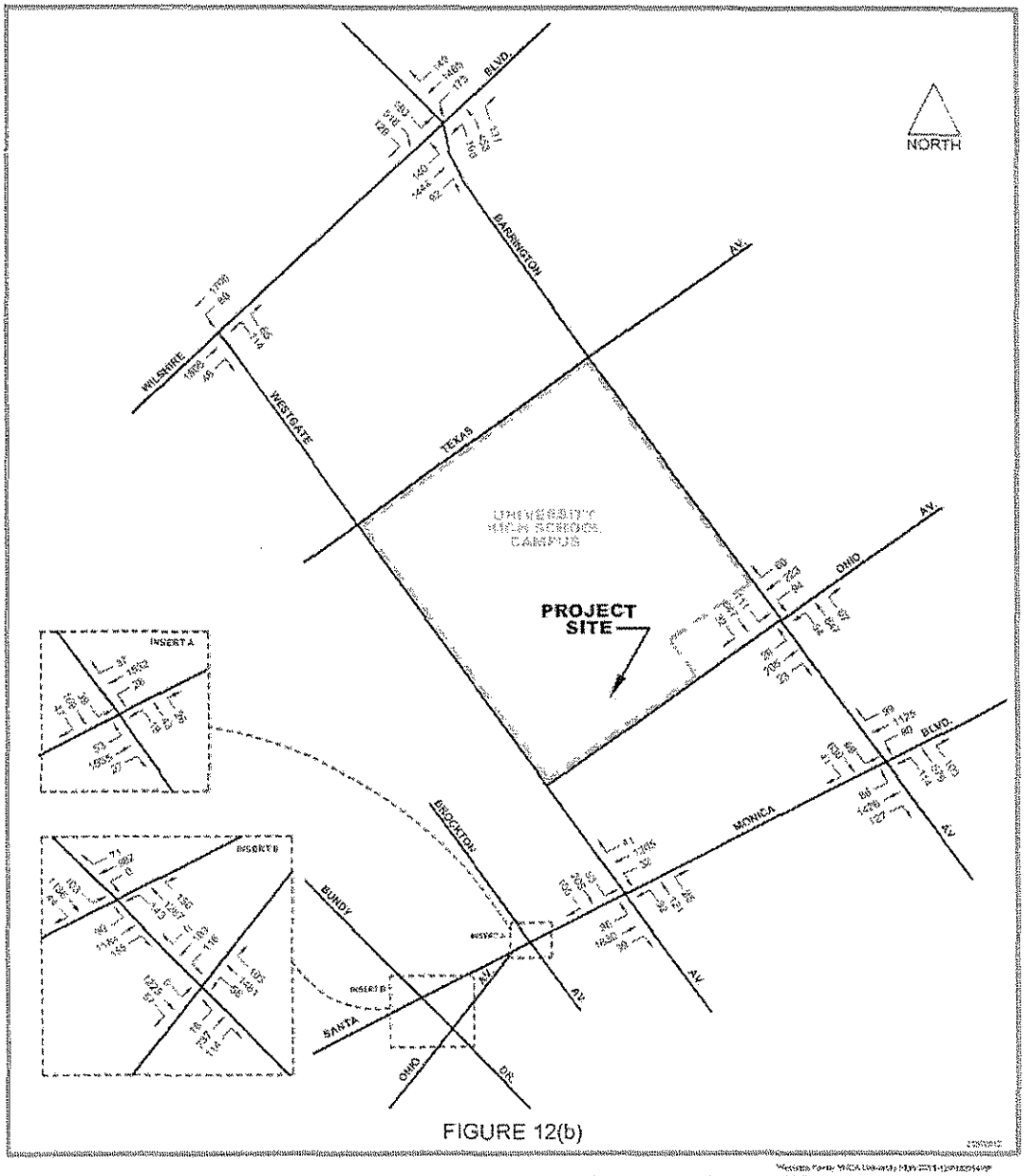


Figure 3F-8. Future With Project PM Peak



Mitigation Measures

As indicated in the preceding discussion, , the Proposed Project would not result in significant impacts at any of the study area intersections during adjusted 2011 or 2014 conditions. Therefore, the Proposed Project would be incompliance with applicable plans ordinances and policies governing the effectiveness and performance of the entire circulation system. No traffic mitigation measures are required to reduce a potentially significant effect.

Residual Impacts

No residual impacts would occur as a result of implementation of the Proposed Project.

Impact F-2: Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

Less than significant impact

The local CMP requires that a traffic impact analysis be performed for all CMP monitoring intersections where a project would likely add 50 or more peak-hour trips. The nearest such monitoring location is the intersection of Santa Monica Boulevard and Bundy Drive, which is a study intersection evaluated herein and was included in the CMA analysis.

A review of the Proposed Project trip generation and trip distribution pattern indicated the project would not add 50 or more trips to any CMP intersections during either the AM or PM peak hour. The largest addition of project traffic at the intersection of Santa Monica Boulevard and Bundy Drive would be 13 trips during the PM peak hour. These trips would not result in a significant project impact, as determined in the detailed CMA analysis.

In addition, a traffic impact analysis is to be conducted for any CMP freeway monitoring segment where a project is expected to add 150 or more peak-hour trips in either direction. As discussed, the Proposed Project would generate 85 or fewer trips during both peak hours. These traffic generation levels are lower than the freeway threshold of 150 directional trips. Therefore, no significant project impacts to CMP freeway monitoring locations are forecast and no additional freeway analysis is necessary.

Residual Impacts

Impacts would be less than significant.

3F.5 CUMULATIVE IMPACTS

Less than significant impact

Cumulative growth in the project area is accommodated by applying an ambient traffic growth factor of 1.0 percent per year, compounded annually, to existing traffic counts to estimate future traffic conditions. To ensure a conservative estimate of cumulative traffic conditions, the traffic generated by 64 related projects in the study area was added to the future baseline traffic volumes. As discussed above, potential traffic impacts would not occur under future conditions. Therefore, cumulative impacts associated with the Proposed Project would not occur. Impacts would be less than significant.

Mitigation Measures

No mitigation measures are required to reduce significant impacts as no impacts would potentially occur. Project related impacts are less than significant.

Residual Impacts

Impacts would be less than significant.

Section 3G. Energy

3G.1 INTRODUCTION

This section evaluates energy impacts associated with the development of the Proposed Project. To ensure that energy impacts are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. The analysis in this section considers the expected energy use of the Proposed Project, as well as measures that will help to reduce energy consumption (CEQA Guidelines, Appendix F).

3G.2 EXISTING ENVIRONMENTAL SETTING

The Southern California Gas Company (SoCalGas) provides natural gas services to the University High School campus. Natural gas service to the campus is provided through a SoCalGas pipeline located beneath Ohio Avenue.

The Los Angeles Department of Water and Power (LADWP) provides electricity services to the University High School campus. The overhead electric distribution system serves the campus and the project site.

3G.3 APPLICABLE REGULATIONS

3G.3.1 Federal

The Federal Energy Regulatory Commission regulates the transmission and sale of electricity and interstate commerce, licensing of hydroelectric projects, and oversight of related environmental matters.

3G.3.2 State

The California Public Utilities Commission (CPUC) sets forth specific rules that relate to the design, installation, and management of California's public utilities, including electric, natural gas, water and transportation, and telecommunications.

California Environmental Quality Act (CEQA)

Appendix F of the CEQA Guidelines describes the energy conservation information and analyses that should be included in an EIR. Energy conservation is defined in terms of decreased reliance on natural gas and oil, decreased per capita energy consumption and increased reliance on renewable energy sources. An EIR must include a discussion of potentially significant energy impacts of the proposed project, with emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.

State of California Energy Plan

The California Energy Commission (CEC) identifies emerging trends in energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy in the State Energy Plan. The plan calls upon the state to reduce congestion and increase the efficient use of fuel supplies. The plan also encourages urban designs that reduce vehicle miles traveled and accommodate pedestrian and bicycle access (SCAG).

State of California, Flex Your Power Campaign

The State's intent to reduce energy consumption is also reflected in the established Flex Your Power Campaign. Flex Your Power aims to partner with California residents across the state to maximize energy conservation and efficiency. The goal is to get local governments and elected officials to implement innovative energy conservation and efficiency measures in facilities throughout communities. Flex Your Power distributes information packets with the latest initiatives (from targeted rebate programs to community assistance planning) and an initial Local Area Workplan to educate the community on how to get their local government involved and encourage their government to take advantage of these programs.

Flex Your Power collaborates with local businesses and community groups to get local business leaders and building owners to sign an Energy Conservation Declaration Action, thereby committing to follow measures that will help "achieve collectively an overall 20 percent reduction in energy use as compared to the same period last summer." Some of the activities outlined in the declaration include setting building temperatures no cooler than 78 degrees during the months of May through October, reducing lighting levels by 25 percent, closing blinds and shades where windows contribute to indoor temperature increases, and turning off and unplugging all appliances in commercial and residential buildings. Businesses can also benchmark buildings using the Energy Star rating system, which calculates energy use in a building or a group of buildings, providing a tool with which to measure the impact of energy efficiency improvements. This can provide a way to compare energy use in buildings of similar size, shape, location, and operating characteristics. The results (a number on a scale of 1 to 100) determine which buildings will benefit most from energy efficiency upgrades. By increasing energy efficiency in buildings, local governments can save energy immediately.

Title 20 and Title 24, California Code of Regulations

New buildings constructed in California must comply with the standards contained in Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards, of the California Code of Regulations (CCR). Title 20 contains standards ranging from power plant procedures and siting to energy

efficiency standards for appliances to ensuring reliable energy sources are provided and diversified through energy efficiency and renewable energy resources. Title 24 contains energy efficiency standards for residential and nonresidential buildings based on a state mandate to reduce California's energy demand. Specifically, Title 24 addresses a number of energy efficiency measures that impact energy used for lighting, water heating, heating, and air conditioning, including the energy impact of the building envelope such as windows, doors, skylights, wall/floor/ceiling assemblies, attics, and roofs. The Energy Commission adopted the 2005 changes to the Building and Energy Efficiency Standards to address California's energy crisis and reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. The current standards went into effect on October 1, 2005.

State Green Building Standards Code (CALGreen)

On January 12, 2010, the California Building Standards Commission adopted a statewide green building standards code known as "CalGreen". CalGreen supplements the California Building Standards Code and went into effect on January 1, 2011. CalGreen requires new buildings to demonstrate a 20 percent reduction in water usage, divert 50 percent of construction waste from landfills, install low-pollutant emitting interior finishes such as paints, carpets, and flooring, and upgrade irrigation (landscape) devices for non-residential buildings.

3G.3.3 Local

Green LA Program

As the provider of electricity and water to the City of Los Angeles, LADWP offers its customers a number of ways to reduce their energy consumption including cash rebates for more efficient appliances, and exchange programs for inefficient appliances. LADWP has also launched an aggressive initiative to integrate more renewable energy into its power supply. In 2005, 3% of LADWP's power supply consisted of energy from renewable sources. As of July 1, 2008, 8.5% of LADWP's energy portfolio was renewable. LADWP's goal is to have 20% of its power supply come from renewable sources by 2020.

3G.4 ENVIRONMENTAL IMPACTS AND MITIGATION

3G.4.1 Methodology

This section includes an analysis of operational demands on electricity and natural gas supply resulting from the Proposed Project. This section also includes an assessment of energy consumption resulting from gasoline use associated with vehicle trips and corresponding trip lengths generated by the Proposed Project. To determine whether implementation of the Proposed Project

would impact electricity and natural gas, the projected increase in energy demand for each utility was analyzed and calculated using a per-square foot consumption rate as provided by the LAUSD OEHS. Generation factors provided by LAUSD were derived as part of a 2007 GHG Emissions Inventory and are considered applicable to the Proposed Project. Generation factors apply to conditioned space and are typical for high schools in the LAUSD. Vehicle Miles Traveled (VMT) was used to calculate project demand on gasoline resources. Total power consumption was calculated for the Proposed Project along with existing onsite uses that would be removed as part of the Proposed Project. The net difference between existing and proposed uses after project implementation would represent the total energy demand created by the Proposed Project.

3G.4.2 Criteria for Determining Significance

Based on the CEQA Guidelines, Appendix F, energy impacts would be considered significant if implementation of the proposed project would result in:

- Conflict with adopted energy conservation plans;
- Use non-renewable resources in a wasteful and inefficient manner; or
- Result in a significant demand on regional energy supply or require substantial alterations to existing power or natural gas systems.

3G.4.3 Project Impacts

Impact G-1: Result in Conflict with adopted energy conservation plans?

Less than significant impact

The Proposed Project would not conflict with adopted energy conservation plans, including those at the federal, state, and local levels. The Proposed Project would be designed to meet or exceed the requirements of Title 24 and use solar energy features where installation would be cost effective. The Proposed Project would also be designed with cost and energy saving features such as the use of: natural lighting and/or lighting types that are more efficient than incandescent lighting; light sensors that automatically switch off; lighting switches and thermostats equipped with multi-switch provisions; a well sealed building envelope to prevent outside air from infiltrating and increasing interior space conditioning loads; and solar water heating for swimming pools.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Project impacts on adopted energy conservation plans would be less than significant.

Impact G-2: Result in use of non-renewable resources in a wasteful and inefficient manner?

No impact

The Proposed Project would be designed with cost and energy saving building elements. Use of non-renewable resources would not occur in a wasteful or inefficient manner.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Proposed Project impacts resulting from the use of non-renewable resources in a wasteful and inefficient manner would not occur.

Impact G-3: Result in a significant demand on regional energy supply or require substantial alterations to existing power or natural gas systems.

Less than significant impact

The Proposed Project would create a direct demand for electricity, natural gas, and gasoline; however, demand would not be significant relative to the regional energy supply or require substantial alterations to existing power or natural gas systems. The Proposed Project would be located in an area currently served by utility providers and replace existing modular buildings that use/used electricity. Utility connection upgrades would be requested to serve the Proposed Project in accordance with utility company specifications. The following section addresses total estimated energy consumption created by the Proposed Project.

Electricity

Implementation of the Proposed Project would create a direct demand for electrical power. Energy demand varies between types of appliances and machinery/equipment. To provide an accurate estimate of electrical power that would be demanded by the Proposed Project, a factor of 133.6 Kilowatt-hours per square-foot annually (kWhr/ft^2/year) was utilized. Using this factor as provided by LAUSD OEHS, the Proposed Project would require an estimated 8.28 million kWh annually.

Natural Gas

Implementation of the Proposed Project would create a direct demand for natural gas. Estimated natural gas consumption was derived using a demand factor of 34 cubic feet per square-feet annually (CF/ ft2/year). Using this demand factor as directed by LAUSD, the Proposed Project would demand an estimated 2.1 million CF of natural gas per year.

Gasoline Consumption

Once completed and occupied, the proposed YMCA facility is anticipated to generate a total of 1,204 vehicle trips per day. Based on the location of the Proposed Project and assumptions about user driving habits, it is estimated that each trip would cover 9.3 miles. Therefore, total VMT for the Proposed Project would be 11,198 daily or 4.08 VMT annually. Vehicle trips to and from the proposed YMCA facility would consume 204,035 gallons annually.

The project's estimated electricity, natural gas, and gasoline consumption, are shown in Table 3G-1.

Table 3G-1. Estimated Power Consumption – Proposed Project

Energy Type	Usage/Unit	YMCA Build-out	Annual Energy Use
Electricity	133.6 kWhr/ft^2/year	62,500 ft^2	8.28 million kWh
Natural Gas	34 CF/ ft2/year	62,500 ft^2	2.125 million CF
Gasoline	0.05 Gal/mile	11,198 VMT	204,035 gallons

Notes: The average vehicle trip length is estimated to be approximately 9.3 miles based on SCAQMD vehicle estimates for Los Angeles County (2009), Table A9-14-A. Gasoline usage is based on an estimated 20 miles per gallon (mpg) fuel economy. VMT = per day.

kWhr = Kilowatt-hour
ft^2 = Square feet
CF = Cubic feet
Gal = Gallon
Source: LAUSD OEHS GHG Emissions Inventory (2007) and SCAQMD

Existing Onsite Uses

The Proposed Project would require removal of existing facilities that create a demand on energy resources. These facilities include two portable high school double classrooms and a locker room. Removal of these uses as part of the Proposed Project would eliminate their demand for electricity, natural gas, and gasoline. It should be noted that the existing Westside Family YMCA facility located at 11311 La Grange Avenue would cease operation in conjunction with the Proposed Project. Given that the existing site would no longer operate in its current capacity, energy consumption associated with the facility would be reduced. The Proposed Project would be more energy efficient than the existing facility because it would be constructed to higher energy efficiency standards. Nevertheless, no energy credit has been applied for the existing YMCA facility to

provide a more conservative analysis of project-related energy demand. Power consumption from existing onsite uses are estimated in Table 3G-2. The net energy demand created by the Proposed Project is shown in Table 3G-3.

Table 3G-2. Estimated Power Consumption – Onsite Uses

Energy Type	Usage/Unit	Proposed for Removal	Annual Energy Use
		2 Double Classrooms (60 students)	
Electricity	133.6 kWhr/ft^2/year	4,275 ft^2	571,140 kWhr
Natural Gas	34 CF/ ft2/year	4,275 ft^2	145,350 CF
Gasoline	0.05 Gal/mile	904 VMT	16,498 gallons
		Locker Room	
Electricity	133.6 kWhr/ft^2/year	800 ft^2	106,880 kWhr
Natural Gas	34 CF/ ft2/year	800 ft^2	27,200 CF
Gasoline	0.05 Gal/mile	102 VMT	1,862 gallons

Notes: The average vehicle trip length is estimated to be approximately 9.3 miles based on SCAQMD vehicle estimates for Los Angeles County (2009), Table A9-14-A. Gasoline usage is based on an estimated 20 miles per gallon (mpg) fuel economy. ITE 8th Edition Trip Generation Rates for Middle School/Junior High School: 13.78 trips per 1000 ft^2 or 1.62 trips per student. VMT = per day.

kWhr = Kilowatt-hour
ft^2 = Square feet
CF = Cubic feet
Gal = Gallon

Source: LAUSD OEHS GHG Emissions Inventory (2007), SCAQMD, and ITE 8th Edition Land Use Code (522) Middle School/Junior High School Trip Estimates

Table 3G-3. Net Estimated Energy Consumption

Land Use	Electricity (kWh)	Natural Gas (CF)	Gasoline (gal)
62,500 ft^2 YMCA	8.28 million	2.125 million	204,035
	-	-	-
2 Double Classrooms	571,140	145,350	16,498
Locker room	106,880	27,200	1,862
Net Total	7.6 million	1.952 million	185,675

Overall, the Proposed Project would create a net increase in demand for energy. As shown in Table 3G-3, this demand would consist of 7.6 million kWh of electricity, 1.952 million cubic feet of natural gas, and 185,675 gallons of gasoline. These projections are conservative and not significant when compared to the regional supply and demand. Moreover, it is likely that gasoline consumption would be reduced as a result of an increased reliance on public transportation to access the site. As discussed in Section 3F, the project area is well served by bus lines operated by the Los Angeles County Metropolitan Transit Authority (Metro) and the Santa Monica Big Blue Bus (SMBBB). These

bus lines are located within convenient walking distance (one-quarter mile) of the project area and offer multiple connection opportunities to regional transit services offered by Metro, SMBBB, and other transit providers. Energy consumption could also be reduced through the use of other cost and energy saving measures considered as technology develops. Therefore, associated impacts are considered less than significant.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Project impacts on fire protection services would be less than significant.

3G.5 CUMULATIVE IMPACTS

Less than significant impact

This analysis is based on the list of related projects provided in Table 2-1. The listed projects include other projects that are currently under construction, approved but not built, or proposed for development and that may substantially increase energy consumption. Those projects identified in Table 2-1 would have a significant cumulative impact on energy demand if they would result in an overall increase in population and structures. The cumulative projects would, in many cases, replace existing structures with new development designed and constructed to current codes and standards. Thus, cumulatively, projects would increase energy consumption during construction but over time, reduce energy consumption relative to those facilities that operate or are approved for operation on the various development sites.

Mitigation Measures

No mitigation measures are required.

Residual Impacts

Impacts would be less than significant.

Chapter 4. Alternatives Analysis

4.1 INTRODUCTION AND OVERVIEW

Section 15126.6 of the CEQA Guidelines requires that an EIR describe a range of reasonable alternatives to the project, or to the location of the project that could feasibly avoid or lessen any significant environmental impacts while substantially attaining the basic objectives of the project. An EIR should also evaluate the comparative merits of the alternatives. This chapter sets forth potential alternatives to the Proposed Project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines (Section 15126.6) pertaining to the alternatives analysis are summarized below.

- The discussion of alternatives will focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.
- The No-Project Alternative will be evaluated along with its impact. The no-project analysis will discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis will discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason"; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives will be limited to ones that would avoid or substantially lessen any of the significant effects of the Proposed Project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the Proposed Project need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision making. Among the factors that may be taken into account when addressing the feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of

infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site.

4.2 PROJECT OBJECTIVES

As discussed in Chapter 2, Project Description and Environmental Setting, the Proposed Project is intended to implement terms of the March 2008 joint-use agreement between LAUSD and the YMCA. It is intended to fulfill the following major objectives with the construction of a new community facility and parking structure:

- Establish a joint community facility and public school that provides mutually beneficial amenities to the students, teachers and communities served by LAUSD and YMCA;
- Provide programming and services that complement the academic and physical fitness programs of LAUSD and YMCA;
- Maximize the utilization of real estate assets that reflect the wise and efficient use of limited land and public resources; and
- Promote schools that serve as centers of the community.

4.3 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible; and therefore, merit in-depth consideration, and which are infeasible and can be dismissed. Alternatives considered by LAUSD include a range of potential projects to meet the terms of the joint-use agreement, needs of the local district, and evaluation of existing facilities.

Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered. Alternatives were considered by LAUSD during its scoping process for the Proposed Project. This chapter identifies alternatives considered by the lead agency, but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion.

4.3.1 Reasonably Foreseeable On-site Development Alternative

This alternative considers a reasonably foreseeable future use of the site if the Proposed Project is not constructed. If the Proposed Project were not developed, existing land uses would remain in place for the foreseeable future. The Proposed Project site is currently occupied by two tennis courts, five hand-ball (i.e., wall-ball) courts, and four bungalow buildings owned by LAUSD. These buildings are used as portable classrooms and a locker/restroom. Existing land uses that occupy the site are consistent with the general plan and zoning for the

site; therefore, it would be remote and speculative to discern any other potential on-site development. Thus, this alternative was dropped from further consideration within this EIR.

4.3.2 Alternative School Site – Webster Middle School

When the YMCA and LAUSD began discussions regarding developing a joint use project, Webster Middle School, located at 11330 Graham Place, was initially identified as a feasible location for the Proposed Project. Webster Middle School is on a large 22 acre site and has sufficient excess acreage to accommodate the Proposed Project. This school is also located in proximity to those anticipated to use the YMCA facility. However, this site was eliminated because of the potential conflict between the adult programs offered by the YMCA and the age of Webster Middle School's student population. This site also does not have outdoor athletic facilities (tracks and fields) that would be available for joint-use.

4.3.3 On-site Alternative – Off-site Parking

During planning for the Proposed Project, an alternative configuration on the University High School site was considered but rejected. This alternative would develop a proposed joint-use facility on-site with vehicle parking at an off-site location. This alternative was considered during the planning phase to minimize the project footprint on the existing campus. Further, this alternative would be less costly than constructing underground parking or a parking structure. However, this alternative was ultimately rejected because no feasible off-site parking could be identified.

4.4 ALTERNATIVES TO THE PROPOSED PROJECT CONSIDERED

The alternatives identified below, with the exception of the mandatory No-Project Alternative, were selected because of their potential to attain basic project objectives and reduce, minimize or avoid significant environmental effects that could result from implementation of the Proposed Project.

4.4.1 No-Project Alternative

CEQA Guidelines Section 15126.6 requires the analysis of a no-project alternative. This analysis must discuss the existing condition, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved based on current plans, site zoning, and consistency with available infrastructure and community services.

If the project is a development project on an identifiable property, the no-project alternative is defined as the circumstance under which the project would not proceed. The discussion compares the environmental effects of the property remaining in its existing state against the environmental effects that would occur if the project were approved.

If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of another project, the no-project consequence should be discussed. In certain instances, the no-project alternative means "no build," wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the no-project analysis should identify the practical result of the project's non-approval—that is what reasonably foreseeable development would result—and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. As discussed, the Reasonably Foreseeable On-site Development Alternative was considered and rejected from further consideration because determining potential future on-site development would be speculative, as described under Section 4.3 above.

Under the No-Project Alternative, the proposed YMCA at University High School would not be constructed. The terms of the March 2008 joint-use agreement between LAUSD and the YMCA would not be fulfilled. Surrounding LAUSD-administered schools including but not limited to Webster Middle School, Emerson Middle School, Brentwood Science Magnet School, Richland Elementary School, and Brockton Elementary School, would not have access to the proposed joint-use facility at University High School. The current site would remain in its present condition into the foreseeable future.

4.4.2 Reduced Project Size Alternative

The Reduced Project Size Alternative involves the development of the Proposed Project with a twenty-five percent reduction in the size and scale. The reduction in project size would result in fewer and/or smaller recreational and educational amenities (pool room, weight and fitness center, classroom and test/examination rooms.

As proposed, the current project design calls for a two-level 62,500 square-foot facility and accompanying four-level parking structure capable of accommodating 181 motor vehicle parking spaces. The reduction in project size would result in a proportional reduction in the size of the parking structure from four to three levels and from 181 parking spaces to 136 spaces. The YMCA facility would be reduced to approximately 46,875 square feet.

4.4.3 On-site Alternative – Underground Parking and Surface Parking Lot adjacent to Barrington Avenue

During planning for the Proposed Project, an alternative configuration for the parking element was considered but rejected. This alternative would develop the proposed YMCA facility with 1 ½ levels of underground parking, and approximately 52,000 square feet of paved surface parking including 41,000 square feet of paved surface parking adjacent to South Barrington Avenue. This

alternative was added to the alternatives impact analysis and evaluated in Section 4.5.3.

4.5 ALTERNATIVES IMPACT ANALYSIS

This section presents an analysis of alternatives to the Proposed Project and consists of the following:

- No-Project Alternative;
- Reduced Project Size Alternative; and
- On-site Alternative – Underground Parking and Surface Parking Lot adjacent to Barrington Avenue.

This section also provides a comparison of the impacts between these alternatives and the Proposed Project for those environmental issues addressed in this document. In all cases, the comparison of impacts assumes that all feasible mitigation measures as identified in this document have been implemented for the impacts resulting from the Proposed Project. Similarly, in all cases where feasible mitigation measures for impacts caused by the alternative are identified, it is assumed that those mitigation measures would be implemented. In accordance with CEQA Guidelines Section 15126.6, the discussion of the environmental effects associated with the alternatives may be less than that associated with the Proposed Project.

4.5.1 No-Project Alternative

Description and Analysis

The No-Project Alternative involves no construction. The two tennis courts, five hand-ball (i.e., wall-ball) courts and four bungalow buildings would remain as would the asphalt surface parking lot and basketball courts located along Ohio Avenue in the southern portion of the project site. None of the project objectives identified in Section 2.2 of this document would be met.

Air Quality

No air quality impact would occur under this alternative. This alternative would not generate air emissions associated with Proposed Project construction and would not change traffic-related air emissions associated with operation of the Proposed Project. Therefore, the No-Project Alternative is considered environmentally superior to the Proposed Project regarding air quality.

Cultural Resources

Under the No-Project Alternative, the likelihood of disturbing historical, archeological, or paleontological resources would be less than the Proposed

Project. No ground disturbing activities from construction would occur, and all existing building structures and related uses would remain. While mitigation measures would avoid potentially significant impacts to known cultural resources located in proximity to the site and those discovered during excavation, this alternative would avoid all potential impacts. Therefore, the No-Project Alternative may result in fewer cultural resources impacts than the Proposed Project and is considered environmentally superior to the Proposed Project.

Greenhouse Gas Emissions

No greenhouse gas emissions would be generated under this alternative as no air emissions associated with Proposed Project construction and operation would occur. Therefore, the No-Project Alternative is considered environmentally superior to the Proposed Project with regard to greenhouse gas emissions.

Noise

The No-Project Alternative would not involve construction of a new YMCA facility and parking structure or generate increased traffic. Construction related noise would be avoided. No change in the existing noise environment would occur. The No-Project Alternative is considered environmentally superior to the Proposed Project regarding temporary construction noise and similar for operational noise.

Public Services

Under the No-Project Alternative, no impacts would occur to emergency fire response to the site as no new growth would occur within the general area surrounding the site and traffic volumes would not be affected. However, the Proposed Project would have a less than significant impact on the provision of fire and emergency services. Thus, impacts associated with the No-Project Alternative would be similar to the Proposed Project.

Traffic and Circulation

No construction or operational traffic would occur under the No-Project Alternative. However, while the Proposed Project would generate new trips, it would not adversely affect operation of the intersections evaluated as part of the Traffic Impact Study. Therefore, the No-Project Alternative is considered similar to the Proposed Project regarding traffic and circulation.

Energy

Under the No Project Alternative, the existing structures and related uses would remain on-site. No demolition or construction would occur. Energy consumption associated with existing uses would remain the same as current conditions. The No Project Alternative would avoid energy consumption associated with

construction and operation of the new YMCA facility and parking structure. Thus, it would be considered environmentally superior to the Proposed Project.

Conclusion and Relationship to Project Objectives

The No-Project Alternative would result in a continuation of existing conditions at the project site. No new environmental impacts in the environmental areas of air quality, cultural resources, noise, public services, traffic and circulation and energy would occur. By the same accord, this alternative would achieve none of the project objectives outlined in Section 2.2 above. Thus, while the No Project alternative may avoid temporary construction impacts, it has been rejected from further consideration.

4.5.2 Reduced Project Size Alternative

Description and Analysis

The Reduced Project Size Alternative would result in a proportional reduction in the size of the parking structure from four to three levels and from 181 parking spaces to 136 spaces. The YMCA facility would be reduced from 62,500 square feet to approximately 46,875 square feet.

Air Quality

Air quality emissions from this alternative would be less than those generated by the Proposed Project. Construction emissions generated by the Proposed Project would be below local significance thresholds. Construction-related air quality emissions under the Reduced Project Size Alternative would be less when compared to the Proposed Project because the magnitude of construction activity would be less. During the operational phase, this alternative would result in fewer vehicle trips based on the trip generation methodology presented in the Traffic Impact Study (see Appendix E). Thus, vehicle emissions associated with the Reduced Project Size Alternative would be less than the Proposed Project. Operational emissions would not be significant with the Proposed Project. This alternative would not result in any appreciable difference in overall operational emissions; however, because construction emissions would be less than the Proposed Project, the Reduced Project Size Alternative would be superior.

Cultural Resources

This alternative would require the same basic site preparation and excavation work as the Proposed Project. While no significant historic structures or known resource occur on-site, there remains the potential for archeological or paleontological resources to be discovered during construction. Thus, while a reduced footprint would accommodate this alternative, impacts associated with would be similar when compared to the Proposed Project. With mitigation, impacts to cultural resources from the Proposed Project would be less than

significant. The same mitigation would be required under this alternative; thus, potential impacts would be similar to the Proposed Project.

Greenhouse Gas Emissions

Greenhouse gas emissions would be generated under this alternative during construction and operation. The scope and duration of construction would be less than the Proposed Project; thus, greenhouse gas emissions would be less. Operational emissions would be similar to those estimated for the Proposed Project. Therefore, from a construction perspective, the Reduced Project Size alternative would be environmentally superior to the Proposed Project for greenhouse gas emissions.

Noise

The primary source of project-related noise that could affect neighboring uses would be generated during demolition and grading. These activities would be the same as described for the Proposed Project. Operational impacts would also be similar to those of the Proposed Project. Marginally fewer vehicle trips associated with this alternative would not cause a perceptible reduction in noise levels. Implementation of BMPs for noise would be required to reduce, minimize or avoid noise impacts during demolition and grading. Thus, noise impacts associated with the Reduced Project Size Alternative would be similar to the Proposed Project.

Public Services

Under the Reduced Project Size Alternative, impacts to public services would be similar to those expected for the Proposed Project. This alternative would reduce local traffic volumes; however, the Proposed Project is not projected to have an adverse effect on traffic circulation. As discussed, local circulation is a primary factor in determining whether LAFD response times would be affected. Nonetheless, the Reduced Project Size Alternative is considered similar to the Proposed Project with regard to public services.

Traffic and Circulation

Under the Reduced Project Size Alternative, trip generation would be less than that of the Proposed Project. The Proposed Project is expected to generate approximately 1,204 daily vehicle trips. Reducing the footprint by 25% would lower the overall trip volume to 903 daily trips. As discussed, the Proposed Project would not adversely affect traffic circulation; thus, this alternative would not avoid, minimize or reduce an impact. Nevertheless, considering the reduction in the amount of daily traffic generated by the Reduced Project Size Alternative, this alternative is considered environmentally superior to the Proposed Project regarding traffic and circulation.

Energy

Under this alternative, the existing structures and related uses would be demolished and project construction would occur at a scale similar to the Proposed Project. However, construction would require less energy because the overall project would be smaller than the Proposed Project. Further, less energy would be required to operate the smaller YMCA facility. Because less energy would be required to construct and operate the facility under the Reduced Project Size Alternative, it would be considered environmentally superior to the Proposed Project.

Conclusion and Relationship to Project Objectives

The Reduced Project Size Alternative would result in less impact to air quality, greenhouse gas emissions, traffic and circulation and energy as compared to the Proposed Project. This alternative would generally meet the project objectives but not to the desired level. Further, it would not allow the most efficient use of the project site nor would it reduce, minimize or avoid any significant adverse environmental impacts that would occur with the Proposed Project. Thus, while this alternative may reduce the degree of environmental affect associated with energy consumption, trip generation, and air emissions, it has been rejected because it does not best utilize the project site and completely meet the project objectives.

4.5.3 On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue

Description and Analysis

This alternative would develop the proposed YMCA facility with 1 ½ levels of underground parking and approximately 52,000 square feet of paved surface in the same basic configuration as the Proposed Project. This alternative would also include 41,000 square feet of paved surface parking adjacent to South Barrington Avenue. The potential location would be an expansion of the existing parking lot located north of the apartment building and east of the athletic track. This site would require modifications to the vehicle entrance off South Barrington Avenue, and on-campus pedestrian circulation improvements connecting the parking lot with the YMCA facility. Further, construction of this alternative may impact resources found to not be significantly affected by the Proposed Project during the IS/NOP process. Specifically, biological resources may be affected if the removal of mature trees would be required to accommodate the proposed parking lot. This alternative was added to the alternatives impact analysis and evaluated in Section 4.5.3.

Air Quality

Air emissions from this alternative would be similar to those generated by the Proposed Project. Construction emissions generated by the Proposed Project would be below local significance thresholds. This alternative would require construction to clear and prepare the parking lot site. Thus, construction-related air emissions under the Reduced Project Size Alternative would be higher when compared to the Proposed Project because the magnitude of construction activity would be greater. During operation, this alternative would result in similar vehicle trips based on the trip generation methodology presented in the Traffic Impact Study (see Appendix E). Thus, vehicle emissions associated with the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue, be similar to the Proposed Project. Operational emissions associated with the Proposed Project would not be significant. This alternative would not result in any appreciable difference in overall emissions; however, because construction emissions would be greater than the Proposed Project, the On-site Alternative would have a greater impact.

Cultural Resources

This alternative would require the same basic site preparation and excavation work for the Proposed Project site; however, construction would also be necessary east of the proposed site footprint for the parking lot. This parking lot site would be located closer to the Serra/Kuruvungna Springs site than the Proposed Project. This alternative has a greater potential for significant impact to Serra/Kuruvungna Springs. It would alter the setting of Serra/Kuruvungna Springs rather than protect or retain the open park-like character adequately to conform to Standards for Rehabilitation (SWCA, 2011). This alternative would have a larger footprint; therefore, as the disturbance footprint expands, the potential to alter the setting of Kuruvungna Springs and for unearthing subsurface resources during excavation increases. Thus, the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue alternative would have a greater potential impact to cultural resources than the Proposed Project.

Greenhouse Gas Emissions

Greenhouse gas emissions would be generated under this alternative during construction and operation. The scope and duration of construction would be greater than the Proposed Project; thus, greenhouse gas emissions would also be greater. Operational emissions would be similar to those estimated for the Proposed Project. Therefore, from a construction perspective, the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue alternative would have a greater environmental impact than the Proposed Project for greenhouse gas emissions.

Noise

The primary source of noise that could affect neighboring uses would occur during demolition and grading. These activities would be the same as described for the Proposed Project; however, construction of the parking lot would occur closer to sensitive properties located east of South Barrington Avenue and the classrooms located north of the parking lot site. Operational impacts would be similar to those of the Proposed Project. Vehicle trips would be the same (i.e., 1,204 daily trips); and thus, would not cause a perceptible change in noise levels. BMPs would be required to reduce, minimize or avoid noise impacts during demolition and grading. Temporary construction noise impacts would affect a greater number of sensitive receptors relative to the Proposed Project. Operational impacts would be the same as the Proposed Project.

Public Services

Under this alternative, impacts to public services would be similar to those expected for the Proposed Project. This alternative would not induce growth. Traffic volumes would not adversely impact circulation on the surrounding street network. Thus, the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue Alternative is considered similar to the Proposed Project with regard to public services.

Traffic and Circulation

Under the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue Alternative, overall trips would be the same as the Proposed Project. However, some traffic would be shifted to South Barrington Avenue to access the parking lot. As discussed, the Proposed Project would not adversely affect traffic circulation. Thus, this alternative would not avoid, minimize or reduce an impact; and therefore, would be similar to the Proposed Project regarding traffic and circulation.

Energy

Under this alternative, the existing structures and related uses would be demolished and project construction would occur at a scale similar to the Proposed Project. While the parking garage vertical footprint would be smaller, this alternative would require a new parking lot to meet requirements. Overall, energy consumption may be less under this alternative because construction of a parking lot is less energy intensive than a parking garage to accommodate the same number of vehicles. Operational energy requirements associated with YMCA facility and exterior lighting for the parking garage and lot would be similar to the Proposed Project. Energy consumption for the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue Alternative would be similar to the Proposed Project.

Conclusion and Relationship to Project Objectives

The On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue alternative has been identified by LAUSD as meeting the project objectives. However, while it would meet objectives, the potential environmental impacts to air quality, greenhouse gas emissions, and noise during construction could be greater than the Proposed Project. Moreover, impacts to Serra/Kuruvungna Springs could be significant since this alternative would alter the setting of Serra/Kuruvungna Springs rather than protect or retain is open park-like character adequately to conform to Standards for Rehabilitation (SWCA, 2011). Thus, the On-Site Alternative – Underground Parking and Surface Parking Lot Adjacent to South Barrington Avenue alternative is considered environmentally inferior to the Proposed Project.

4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The findings of the alternatives impact analysis discussed above are summarized in Table 4-1. Of the alternatives analyzed in this document, the No-Project Alternative is considered the environmentally superior alternative, as it would avoid all impacts related to the Proposed Project. However, the No-Project Alternative would not meet the objectives of the Proposed Project, as it would not implement the joint-use agreement or provide programming for additional academic and physical fitness programs. The No-Project Alterative would also fail to maximize the utilization of LAUSD real estate assets.

The CEQA Guidelines (Section 15126.6) require that, if the No-Project Alternative is determined to be the environmentally superior, an environmentally superior alternative must also be identified among the remaining alternatives. As such, the Reduced Project Size Alternative would be the environmentally superior alternative, as it would reduce potential impacts during construction and require less energy to operate. However, reducing the facility size would not achieve the following project objectives, to the extent that the Proposed Project would:

- Maximize the utilization of real estate assets to demonstrate efficient use of limited land and public resources.

The Reduced Project Size Alternative would not sufficiently achieve project objectives; and therefore, has been eliminated from consideration.

Table 4-1. Comparison of Alternatives to the Proposed Project

Environmental Issue Area	*Proposed Project (After Mitigation)*	*No-Project Alternative*	*Reduced Project Size Alternative*	*On-site Alternative*
I. AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or pollution control district may be relied upon to make the following determinations. Would the project:				
a. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less Than Significant	Less	Less	Similar
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 (including releasing emission which exceed quantitative thresholds for ozone precursors)?	Less Than Significant	Less	Less	Similar
c. Create or contribute to a non-stationary source "hotspot" (primarily carbon monoxide)?	Less Than Significant	Less	Less	Similar
d. Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant	Less	Less	Greater
II. CULTURAL RESOURCES – Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Less Than Significant	Less	Similar	Greater
b. Cause a substantial adverse change in the significance of a archeological resource pursuant to Section 15064.5?	Less Than Significant	Less	Similar	Greater
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	Less	Similar	Similar
d. Disturb any human remains, including those interred outside of formal cemeteries?	Less Than Significant	Less	Similar	Similar
III. GREENHOUSE GAS EMISSIONS - Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant	Less	Similar	Similar

Environmental Issue Area	*Proposed Project (After Mitigation)*	*No-Project Alternative*	*Reduced Project Size Alternative*	*On-site Alternative*
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less Than Significant	Less	Similar	Similar
IV. NOISE – Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less Than Significant	Less	Similar	Similar
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Less Than Significant	Less	Similar	Similar
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant	Less	Similar	Similar
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Less Than Significant	Less	Similar	Greater
V. PUBLIC SERVICES				
a. Result in unacceptable service ratios, response times or other performance objectives for fire protection and emergency medical services?	Less Than Significant	Less	Similar	Similar
VI. TRANSPORTATION/TRAFFIC – Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Less Than Significant	Less	Less	Similar
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Less Than Significant	Less	Similar	Similar
VII. ENERGY – Would the project:				

Environmental Issue Area	*Proposed Project (After Mitigation)*	*No-Project Alternative*	*Reduced Project Size Alternative*	*On-site Alternative*
a. Conflict with an adopted energy conservation plan, use non-renewable resources in a wasteful and inefficient manner, or require substantial alterations to existing power or natural gas systems?	Less Than Significant	Less	Less	More

Chapter 5. Other CEQA Considerations

This chapter presents the discussion related environmental issues required by CEQA that are not covered within the other chapters of this EIR. The other CEQA considerations include environmental effects found not to be significant, growth-inducing impacts, and significant and unavoidable adverse impacts.

5.1 ENVIRONMENTAL EFFECTS FOUND TO BE NOT SIGNIFICANT

The Initial Study prepared for the Project and included herein as Appendix A, determined that the Proposed Project would result in either no impact or a less–than-significant impact to 10 environmental issue areas. Therefore, these issue areas are not discussed in the EIR. The issue areas determined to have no impact or a less-than-significant impact consist of the following:

- Aesthetics;
- Agricultural Resources;
- Biological Resources;
- Geology and Soils;
- Hydrology and Water Quality;
- Land Use and Planning;
- Mineral Resources;
- Population and Housing;
- Recreation and Parks; and
- Utilities and Service Systems.

After a more detailed evaluation of the environmental issues associated with the Proposed Project, the EIR determined that impacts to the following environmental issues would be less than significant:

- Air Quality;
- Energy;
- Greenhouse Gas Emissions;

- Noise;
- Public Services; and
- Traffic and Circulation.

The environmental analysis in the EIR determined that impacts to the following environmental issues would be less than significant with incorporation of project design features and mitigation measures:

- Cultural Resources

5.2 IRREVERSIBLE ENVIRONMENTAL CHANGES

According to CEQA Guidelines (Section 15126), "[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely." Primary impacts and, particularly, secondary impacts (such as highway improvement which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources are evaluated to ensure that such current consumption is justified. Therefore, the purpose of this analysis is to identify any significant irreversible environmental effects associated with implementation of the Proposed Project that cannot be avoided.

Both construction and operation of the Proposed Project would lead to the consumption of limited, slowly renewable, and nonrenewable resources, committing such resources to uses that future generations would be unable to reverse. New development would require the commitment of resources that include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the project site.

Construction of the Proposed Project would consume certain types of lumber and other forest products, raw materials in steel, metals such as copper and lead, aggregate materials used in concrete and asphalt such as sand and stone, water, petrochemical construction materials such as plastic, petroleum based construction materials, and other similar slowly renewable or nonrenewable resources. Additionally, fossil fuels for construction vehicles and equipment would also be consumed. In terms of project operations, the following slowly renewable and nonrenewable resources would be required: natural gas, electricity, petroleum based fuels, fossil fuels, and water. Title 24 of the California Administrative Code regulates the amount of energy consumed by new development for heating, cooling, ventilation, and lighting purposes. Nevertheless, the consumption of such resources would represent a long-term commitment of those resources.

The commitment of resources required for the construction and operation of the project would limit the availability of such resources for future generations or for other uses during the life of the project. However, continued use of such resources is consistent with the anticipated growth and planned changes on the project site and within general vicinity. Furthermore, impacts to the energy supply would be less than significant given the existing level of development within the central region of Los Angeles.

The Proposed Project would result in commitment of already developed land to recreational uses, eliminating other options for its use. Along with the long-term commitment of land uses is an increased commitment of certain public services to the proposed land uses. This includes the provision of police, fire, and emergency medical services; water supply services; wastewater treatment services; and solid waste disposal. However, as indicated in the Initial Study and respective sections of the EIR, there would be either no impact or a less than significant impact to public services.

5.3 GROWTH-INDUCING IMPACTS

Pursuant to the CEQA Guidelines (Section 15126(d)), an EIR must address whether a project will directly or indirectly foster growth as follows:

> *[An EIR shall] discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of wastewater treatment plant, might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also discuss the characteristic of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

As discussed in this section, this analysis evaluates whether the Proposed Project would directly or indirectly induce economic, population, or housing growth in the surrounding environment.

Direct Growth-Inducing Impacts in the Surrounding Environment

A project would directly induce growth if it would remove barriers to population growth. This would include amendments to a General Plan and Zoning Ordinance allowing new residential development. The Proposed Project would develop a new YMCA facility on an existing school site. The Proposed Project would serve residents within the general study area and students, faculty and

staff of University High School and surrounding schools as discussed in Section 2.0, Project Description. The Proposed Project would serve an existing population. It would not induce growth or otherwise contribute to an increase in population within proximity to the YMCA facility.

Indirect Growth-Inducing Impacts in the Surrounding Environment

A project would indirectly induce growth if it would increase the capacity of infrastructure in an area in which the public service currently meets demand. Examples would be increasing the capacity of a sewer treatment plant or a roadway beyond that needed to meet existing demand. The Proposed Project would use existing utility infrastructure and public services. No upgrades or expansion to existing utilities or LAFD resources would be required to serve the Proposed Project.

5.4 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL IMPACTS

The potentially adverse effects of the Proposed Project are discussed in Chapter 3 of the EIR. The evaluation of environmental impacts concludes that the Proposed Project would not result in significant adverse impacts. Implementation of standard conditions and mitigation measures would reduce project impacts to less than significant levels.

Chapter 6. Acronyms and Abbreviations

AB	Assembly Bill
ACM	asbestos containing material
ADT	Average Daily Traffic
amsl	above mean sea level
ANSI	American National Standards Institute
APE	Area of Potential Effects
AQMP	Air Quality Management Plan
ASHRAE	American Society of Heating, Refrigeration, and Air-Conditioning Engineers
ATCM	Airborne Toxic Control Measure
BMPs	best management practices
Board	LAUSD Board of Education
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAPCOA	California Air Pollution Control Officers Association
CAT	Climate Action Team
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CH_4	methane
CHRIS	California Historic Resources Information System (CHRIS)
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO	carbon monoxide

CO_2	carbon dioxide
CRH	California Register of Historical Resources
dB	decibel
dBA	A-Weighted Decibel
DOT	U.S. Department of Transportation
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
ESA	environmental site assessment
FCC	Federal Communications Commission
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHGs	Greenhouse gasses
H_2S	hydrogen sulfide
HCM2000	2000 Highway Capacity Manual
HCS	OSHA Hazard Communication Standard
HFCs	hydrofluorocarbons
HRA	health risk assessment
HSC	California Health and Safety Code
HUD	U.S. Department of Housing and Urban Development
HVAC	heating, ventilation, and air-conditioning
I-405	Interstate 405
I-10	Interstate 10
ICU	Intersection Capacity Utilization
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ITE	Institute of Traffic Engineers
LA Green Plan	Green LA, An Action Plan to Lead the Nation in Fighting Global Warming
LACDPW	Los Angeles County Department of Public Works
LADOT	Los Angeles Department of Transportation
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAUSD or District	Los Angeles Unified School District
LBP	lead-based paint

L_{dn}	Day-Night Level
L_{eq}	Equivalent Sound Level
L_{max}	Maximum Sound Level
L_{min}	Minimum Sound Level
L_n	Percentile-Exceeded Sound Level
LOS	level of service
LSTs	localized significance thresholds
Metro	Los Angeles County Metropolitan Transportation Authority
mg/m^3 and $\mu g/m^3$	milligrams and micrograms of pollutant per cubic meter of air
MOU	memorandum of understanding
mph	Miles per hour
MSDS	Material Safety Data Sheet
MUTCD	Manual of Uniform Traffic Control Devices
N_2O	nitrous oxide
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NHMLA	Natural History Museum of Los Angeles County
NO_2	nitrogen dioxide
NOP	notice of preparation
NO_x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OEHS	LAUSD Office of Environmental Health and Safety
OSHA	Occupational Safety and Health Administration
PEIR	program EIR
PFCs	perfluorocarbons
$PM_{2.5}$ and	fine particulate matter, 2.5 microns or less
PM_{10}	respirable particulate matter, 10 microns or less
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
Proposed Project	Westside YMCA Facility
PUC	California Public Utilities Commission
QAH	Qualified Architectural Historian

RCPG	Regional Comprehensive Planning Guide
ROC	reactive organic compounds
RMS	root mean square
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SCAQMD	South Coast Air Quality Management District
SF_6	sulfur hexafluoride
SLF	Sacred Lands File
SO_2	Sulfur Dioxide
SO_4	Sulfates
SO_X	Sulfur Oxides
SRA	source receptor area
SWPPP	Stormwater Pollution Prevention Program
TACs	toxic air contaminants
TIA	Transportation Impact Assessment
TNM®	Traffic Noise Model
V/C	volume-to-capacity
ZIMAS	Zone Information and Map Access System
VMT	vehicle miles traveled
VOC	volatile organic compounds

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Chapter 8 Report Preparation

8.1 REPORT PREPARERS

Name	*Project Role*
Lead Agency / Reviewers	
Bill Piazza	LAUSD CEQA Manager
John Anderson	LAUSD CEQA Senior Project Manager/Consultant
CEQA Consultant: David Evans and Associates, Inc./Hele Pacific Group	
Jeff Rupp, P.E. / Kim Rhodes, LA	Project Oversight
Ryan Birdseye	Principal-in-Charge
Michael D'Alessandro, AICP	Project Manager/Analyst
EIR Subconsultants	
Air & Noise Logic, Inc. (Air Quality and Noise Impact Analysis)	Makeba Pease
Crain & Associates, Inc. (Traffic and Circulation)	Ryan Kelly, P.E.
SWCA (Cultural Resources)	Francesca G. Smith, Senior Architectural Historian/Kevin Hunt, Archaeologist